**Delivered by Mail and Posted Online (to Environmental Registry Ontario)**

28 February 2019

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| Charles O'Hara  Ontario Growth Secretariat Ministry of Municipal Affairs and Housing  777 Bay Street  c/o Business Management Division, 17th floor  Toronto, ON M5G 2E5 |  |

Dear Mr. O’Hara:

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| Re: | Proposed Amendment 1 to the *Growth Plan for the Greater Golden Horseshoe, 2017* (ERO # 013-4506) Proposed Modifications to O. Reg. 311/06 (Transitional Matters - Growth Plans) (ERO # 013-4505) Submissions by Mondelez Canada Inc. |

Mondelez Canada Inc. (“Mondelez Canada”) is the second largest snacking company in Canada manufacturing and marketing some of Canada’s best loved food brands, including Cadbury, Dad’s Cookies and Oreo.

Mondelez Canada is a major employer, employing over 1000 people in the City of Toronto (“City”). Mondelez Canada has invested more than $250million into its urban-based factories in the last few years alone – improving productivity and competitiveness, and helping to retain jobs in the City. Our manufacturing facilities include:

* East York Bakery located 1200 O’Connor Drive / 5 Bermondsey Road;
* Bertrand Plant located at 40 Bertrand Avenue;
* Scarborough Bakery located at 370 Progress Avenue; and
* Gladstone Facility located at 277 Gladstone Avenue.

We have reviewed the Province’s proposal noted above and submit the comments below for the Minister’s consideration. Mondelez Canada would welcome an opportunity to discuss these comments with the Minister’s office, and would be pleased to provide additional information related to the Mondelez Canada facilities if it would assist in considering the requests made in this submission.

**Summary**

Preserving employment areas is of critical importance if the City and the Province are to remain economically vital and competitive. Employment areas and uses need to be protected from the intrusion of sensitive and incompatible land uses, such a residential uses, which can affect the continued ability of employment uses to operate.

Mondelez Canada applauds the Province’s proposal to protect employment areas through the identification of Provincially Significant Employment Zones (“PSEZ”), and asks that its East York Bakery, Bertrand Plant and Scarborough Bakery be identified as PSEZs.

Mondelez Canada also asks that the Province add City of Toronto Official Plan Amendment N. 231 (“OPA 231”) to the transition Regulation 311/06.

**The Mondelez Canada Facilities**

A detailed description of each of the East York Bakery, the Bertrand Plant and the Scarborough Bakery is set out below.

East York Bakery

The East York Bakery is a food processing (cookies and biscuits) plant which makes cookies and crackers under brand names including Oreo, Mr.. Christie, Premium Plus and Peek Freans, employs approximately 600 people and is part of the Provincial agri-food network. Mondelez Canada recently invested over $130m into new state-of-the-art manufacturing lines at our East York bakery, expanding and modernising production, creating more highly-skilled jobs and retaining existing jobs at the site.

Mondelez Canada’s East York Bakery is designated *Employment Area* on the Urban Structure Plan and *Core Employment Area* on the Land Use Plan in the City of Toronto Official Plan (“OP”). The East York Bakery is located within a larger Employment Area.

It is located near the Don Valley Parkway, a *Major Goods Movement Corridor* within the meaning of the *Growth Plan*. The East York Bakery is facing pressure as a result of encroachment of sensitive land uses, including new residential development at 1165 O’Connor Drive and 1401 O’Connor Drive.

Bertrand Plant

The Bertrand Plant manufactures our Halls products for Canada, and to export to the US. The site employees over 150 people and we have invested over $6.3US into the site in recent years, helping to retain jobs in the area.

The Bertrand Plant is designated *Employment Area* on the Urban Structure Plan and *Core Employment Area* on the Land Use Plan in the OP. The Bertrand Plant is located within a larger Employment Area.

The Bertrand Plant is located near both Highway 401 and Highway 404, both of which are *Major Goods Movement Corridors* and is part of the Provincial agri-food network. The Bertrand Plant is located near the study area for the proposed Golden Mile Secondary Plan and is subject to significant pressure arising from nearby residential development proposals, including at 1996-2050 Eglinton Avenue East and 2200-2206 Eglinton Avenue East.

Scarborough Bakery

The Scarborough Bakery is our cookies and biscuit plant which employs nearly 250 people, including the recent addition of 50 new employees as production at the site increases.

The Scarborough Bakery is designated *Mixed-Use Area* in the OP and so technically does not meet the requirements for a PSEZ since it does not have an employment designation. However, it is directly adjacent to an industrial *Employment* *Area* to the west and is located within the Scarborough Centre Secondary Plan Area which contains policies recognizing and protecting existing industrial uses.

The Scarborough Bakery is located less than 500 metres from the Brimley Road and Highway 401 interchange and is part of the Provincial agri-food network. It has been subject to significant pressure over the years as a result of the encroachment of residential development, facilitated by policies in the Secondary Plan which permit sensitive uses in the vicinity.

**Proposed Amendment 1 to the *Growth Plan for the Greater Golden Horseshoe, 2017***

As noted above, Mondelez Canada supports the proposed identification of PSEZs, and asks to that its East York Bakery, Bertrand Plant and Scarborough Bakery be identified as PSEZs.

This identification is important in order to protect these facilities, and the employment areas in which they are located, from encroachment by incompatible uses. With the exception of the Scarborough Bakery with its Mixed Use Area designation, all of these facilities meet the criteria for inclusion in a PSEZ. The identification of these areas as PSEZs is necessary to protect the significant investment that Mondelez Canada has made in its facilities, to support the ongoing operation and retention of jobs at these facilities and to create a climate in which future investment is possible. We note that in a Staff Report dated February 25, 2019, the City’s Chief Planner identified the employment areas in which the East York Bakery and Bertrand Plant are located as areas that should be identified as PSEZs.

**Proposed Modifications to O. Reg. 311/06 (Transitional Matters - Growth Plans)**

We appreciate the Province’s request for feedback as to whether there are any specific planning matters in process that should be addressed through the transition regulation - the example given being official plan amendments that have been adopted and are currently under appeal.

Mondelez Canada asks that the Province modify Regulation 311/06 to identify OPA 231 as a matter in process that was adopted under the previous *Growth Plan* but continues to be partially under appeal at the Local Planning Appeal Tribunal (“LPAT”). As one of the parties to the OPA 231 appeals at the LPAT, Mondelez Canada wishes to ensure that the significant policy effort represented by OPA 231 is not rendered moot by changes to the *Growth Plan*. Instead, the outstanding appeals of OPA 231 should continue under the policy regime that applied at the time of its adoption by City Council and approval by the Minister.

We thank you in advance for your consideration of these matters, and reiterate our interest in meeting with the Minister’s office to discuss these matters further.

Yours very truly,



**Gemma Pryor**

**Associate Director, Corporate and Government Affairs**

**Mondelez Canada Inc.**