



Canadian Fuels
ASSOCIATION
canadienne des carburants

1000-275 Slater St.
Ottawa, Ontario
Canada K1P 5H9
t. 613.232.3709
canadianfuels.ca

August 4, 2023

Hon. Steve Clark
Minister of Municipal Affairs and Housing
College Park 17th Floor - 777 Bay St.
Toronto, ON
M7A 2J3

Hon. Nina Tangri
Associate Minister of Housing
College Park 17th Floor - 777 Bay St.
Toronto, ON
M7A 2J3

RE: ERO 019-6813, Review of proposed policies adapted from A Place to Grow and Provincial Policy Statement to form a new provincial planning policy instrument

Dear Minister Clark and Minister Tangri,

Thank you for the opportunity to provide the following comments as part of ERO 019-6813, Review of proposed policies adapted from A Place to Grow and Provincial Policy Statement to form a new provincial planning policy instrument.

The Canadian Fuels Association (CFA) represents the producers¹, distributors and marketers of transportation fuels including gasoline, ethanol, bio-based diesel, jet fuel, as well as, specialty fuels and lubricants. Our sector represents 111,000 workers operating 15 refineries, including 5 refineries right here in Ontario, 75 fuel distribution terminals and approximately 12,000 retail and commercial sites from coast to coast to coast. Our members supply 95 percent of Canadians' transportation fuel, or 110 billion litres/year, and over 50% of biofuels production capacity in Canada.

CFA members are committed to a future where Canadians achieve significant transportation GHG emissions reductions without compromising the ability to move people and goods. Our [Driving to 2050 Vision](#) highlights how Canada's transportation fuel sector is innovating and investing in the development of clean transportation energy choices which include reliable, affordable low-carbon liquid fuels.

CFA would like to convey its support for the government's initiative to build 1.5 million homes over the next ten years. The housing supply shortage affects all Ontarians: rural, urban and suburban. Our

¹ Canadian Fuels members: Federated Co-operatives Limited, Greenenergy International, Greenfield Global, Imperial Oil Limited, Irving Oil, North Atlantic, North West Redwater Partnership, Parkland Corporation, Petro-Canada Lubricants Inc., Shell Canada Limited, Suncor Energy Products Partnership, Tidewater Midstream and Infrastructure Ltd. and Valero Energy Inc.

member companies and the families they support want livable communities, a thriving economy, a clean and healthy environment and social equity, improving everyone's quality of life.

While CFA and our members support efforts to create much needed housing throughout the province of Ontario, any action to streamline development must be balanced by a robust policy framework to protect employment lands and provide recourse for employers when legitimate requests to densify areas threaten continued business operations. The protection of critical energy infrastructure from the encroachment of sensitive land uses is vital to support growth and development.

CFA continues to be concerned with the erosion of employment lands within municipalities resulting from the conversion to sensitive uses such as residential, day cares, places of worship, etc., and the lack of stringent enforcement of buffer zone regulations and guidelines. Not enforcing buffer zone regulations and guidelines enables incompatible, and potentially unsafe, land uses to be approved within close proximity of existing industrial facilities. Safe industrial operations are incompatible with adjacent residential or other sensitive land uses. The existence of noise, odour, truck or rail traffic has, and will be, a health and safety issue for sensitive land use residents adjacent to such operations.

CFA members provide approximately 95% of the liquid transportation fuels (gasoline/diesel), heating and other fuels used by businesses, governments, public transit and private motorists, serving the 8 million people within the GTA and beyond. In the City of Toronto - Shell Canada Products ("Shell"), Imperial Oil ("Imperial Oil") and Suncor Energy Inc. ("Suncor") - own and operate Canada's largest complex of fuel storage and distribution terminals, located in the north east quadrant of Keele Street and Finch Avenue West. These critical pieces of energy infrastructure have been in operation in their present location since the 1950s. Increased development pressure has recently given rise to applications for residential and other sensitive uses in close proximity to this critical infrastructure operated by CFA members. The fuel terminals and the fuel supply network which services them are fixed assets and cannot be moved. The encroachment of sensitive uses poses a threat to the fuel terminals' stable operating environment, leading to possible supply chain interruptions with consequences for the broader provincial economy. We all have a shared interest in ensuring that local land use planning decisions do not compromise public safety or efficient operations of key infrastructure. The stable supply of these fuels is critical to support essential services including Toronto Pearson International Airport operations and the broader Ontario economy.

In the interests of balancing the intention of the proposed changes and the need for our members to continue operating critical energy infrastructure in the province, we strongly recommend that the government consider:

1. Municipalities should not have the authority to rezone industrial employment lands to residential, mixed use residential, or other non-compatible sensitive uses, where the rezoning places people in too close proximity to industry. We base this on the Ministry's Environmental Land Use Planning Guide, Section D-6: "Compatibility between Industrial Facilities" as the instructional reference tool for planning decisions by municipalities.²
2. For potential emergency situations, sensitive land uses should be kept at a safe distance from industrial employment uses. The "Major Industrial Accidents Council of Canada / Conseil canadien des

² <https://www.ontario.ca/page/d-6-compatibility-between-industrial-facilities>
<https://dr6j45jk9xcmk.cloudfront.net/documents/3048/d-6-3-separation-distances.pdf>

accidents industriels majeurs” has established safe distance guidelines as per the following document:
[Risk-Based Land Use Planning Guidelines](#)

3. Ensure that buffer zone regulations and guidelines are enforced province-wide at both the municipal level and any provincial appeal bodies.

4. Allow for the inclusion of *transportation, industrial and heating fuels* in Section 3.8.1 of the Proposed Provincial Planning Statement ensuring that energy supply planning is not limited to electricity.

Thank you again for the opportunity to provide input on this critical process. Should you have any questions or require any additional information regarding the above, please don't hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read 'L. Tresise', with a stylized flourish at the end.

Landon Tresise
Director, Government and Stakeholder Relations
Canadian Fuels Association
LandonTresise@CanadianFuels.ca