**ACO COMMENTS ON THE PROPOSED REBUILDING ONTARIO PLACE ACT, 2023**

**SCHEDULE 8 OF BILL 5**

**PROTECT ONTARIO BY UNLEASHING OUR ECONOMY ACT, 2025**

**ENVIRONMENTAL REGISTRY NOTICE 025-0416**

**16 May 2025**

Architectural Conservancy Ontario is the largest heritage advocacy organization in Ontario, a registered charity and network of volunteers connected through a small Architectural Conservancy Ontario (ACO) is the largest heritage advocacy organization in Ontario with 17 branches across the province. Our objective is to promote the identification, conservation and reuse of buildings, structures, districts, and landscapes of cultural heritage significance. Under our Keep, Fix and Reuse slogan, we advocate for socially and environmentally sustainable solutions for Ontario’s older building stock.

We value the opportunity to comment on this proposal.

ACO has serious concerns.

Since 2019, Architectural Conservancy Ontario has actively worked to ensure that Ontario Place will be a safe and welcoming place for all Ontarians, and visitors from abroad, to enjoy.

It is important that Ontarians know what is happening to this internationally recognized landmark, a site which a former Minister of Heritage, Tourism, Cultural Industries called the "Crown Jewel of Ontario.” Posting proposals on the Environmental Registry of Ontario is an important way to help protect this treasure.

The proposal to exempt activities at Ontario Place from the public notice provisions of the Environmental Bill of Rights has the potential to seriously threaten the health of both short-term visitors and long-term workers at Ontario Place. It removes the requirement for Ontario Place to inform the public about the environmental, including human, impact of any activities connected to the redevelopment of Ontario Place. Currently, changes to water works, sewage works, roadways, parking areas, land, buildings, structures, or fixtures require public notification.

Transparency will vanish if this amendment is approved.

ACO is deeply concerned about the health and safety of all humans, wildlife, and plants at Ontario Place, and worried about possible future lawsuits from visitors whose health was not adequately protected due to the negligence of the province, namely the lack of proper investigation and disclosure of risks.

ACO is alarmed at this reworking of the Rebuilding Ontario Place Act, 2023 knowing that it comes on the heels of a controversial, much-protested and ultimately withdrawn plan to locate a sewer outflow in the West Channel, on the western side of Ontario Place. Thousands of comments about the plan on the Environmental Registry expressed concern that sewage would pollute the channel, as well as public swimming and rowing areas further west at Sunnyside Beach.

ACO does not feel that ignorance is bliss and calls upon the government to continue to ensure that the redevelopment of Ontario Place takes place under the umbrella of the Environmental Bill of Rights. ACO therefore recommends that Schedule 8 of Bill 5 be removed.