



November 13, 2025

The Hon. Rob Flack
Minister of Municipal Affairs and Housing
17th Floor, 777 Bay Street
Toronto, Ontario M7A 2J3

SUBMISSION RE: Environmental Registry of Ontario Number 025-1108

Dear Minister Flack,

The Toronto Region Board of Trade (the Board), representing businesses in Canada's largest regional economy is responding to ERO 025-1108 in support of a Minister's Zoning Order (MZO) under the *Planning Act* relating to the restriction of building heights at 1875 Steeles Avenue West, adjacent to Sanofi Pasteur Limited's manufacturing facilities and headquarters. Ensuring a long-term supply of protected employment lands including is critical to enabling businesses to locate, grow, expand and continue to invest in the Region.

The recommendations from our [*Race for Space report: Securing the Future of Ontario's Employment Lands*](#), released by the Board in November 2023 remain even more relevant today. While increasing housing supply remains paramount, maintaining and protecting employment lands is equally vital to our economic competitiveness, investment attraction, and business growth.

To date, Ontario has lacked a strategic approach to protecting and unlocking the value of employment lands, resulting in adverse impacts on domestic and foreign investment. Industrial and manufacturing operations like Sanofi's depend on long-term certainty, thoughtful land-use planning and protection of these lands, with formalized buffers and transition zones to reduce land use conflicts and encourage ongoing investment with clear criteria.

The protection and strategic use of employment lands that sustain existing industries and attract new investment are critical, safeguarding these lands ensures that Toronto remains a global centre for innovation, advanced manufacturing and economic growth.

Roselle Martino
Executive Vice President, Policy and Strategic Affairs
Toronto Region Board of Trade