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Provincial Land Use Policy Branch
13th flr, 777 Bay St
Toronto, ON
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Via email: parkwaybeltwestplan@ontario.ca

Re: ERO 026-0229 2026 Proposal to revoke the Parkway Belt West Plan, 1978

On behalf of Canadian Fuels Association (CFA) and our member companies[1], we thank you for the opportunity to provide feedback on the proposal to revoke the Parkway Belt West Plan.

CFA represents producers, distributors, and marketers of Canada's transportation fuels, including gasoline, diesel, ethanol, bio-based diesel, jet fuel, specialty fuels, and lubricants. The sector employs approximately 115,000 Canadians, producing about 110 billion litres of refined petroleum products and more than 5 billion litres of biofuels each year. It also operates around 80 distribution terminals and supplies over 11,500 retail and commercial sites nationwide. CFA members account for virtually all petroleum products and nearly 80% of biofuels produced in Canada, operating 16 refineries and 13 facilities that produce biofuels from coast to coast. Ontario is home to five refineries located in Southwest Ontario where we underpin Ontario's petro-chemical cluster, and eight clean fuel production facilities.

Ontario's energy infrastructure includes everything from electricity wires and pipelines, to refineries and fuel terminals and the fuels sector accounts for 40% of Ontario's end-use energy consumption. CFA appreciates attempts made in the proposed Provincial Planning Statement (PPS) to account for the protection of critical energy infrastructure from unsafe encroachment through rezoning and development.

As Ontario continues to pursue ambitious growth and housing targets, it is essential that land use planning frameworks maintain a balanced approach—one that enables development while also protecting critical energy infrastructure that underpins economic activity and public safety.

[1] Canadian Fuels members: Braya Renewable Fuels, Cenovus Energy, Federated Co-operatives Limited, Greenergy, Greenfield Global, Imperial Oil Limited, Irving Oil, Norcan Petroleum Products GP, North Atlantic, North West Redwater Partnership, Petro-Canada Lubricants Inc., Shell Canada Limited, Suncor Energy Products Partnership, Sunoco LP, Tidewater Midstream and Infrastructure Ltd. and Valero Energy Inc.

CFA is concerned that the proposed Provincial Planning Statement (PPS) places a strong emphasis on enabling development—particularly housing and energy supply expansion—without providing equally clear and enforceable direction on the **protection of existing energy infrastructure**.

The draft policy states:

"Planning authorities should provide opportunities for the development of energy supply…"

While CFA supports enabling new energy development, the policy language presents two critical issues:

1. **Absence of explicit protection requirements:**
   The PPS describes the need for development, but does not establish clear direction to **protect existing infrastructure** from incompatible land uses or encroachment.

2. **Use of permissive language ("should") rather than mandatory language ("shall"):**
   Policies framed as "should" provide flexibility, but do not create enforceable obligations. In practice, this has repeatedly resulted in inconsistent application across municipalities and insufficient consideration of infrastructure protection.

As noted in our previous submission regarding Bill 185, inadequate protection in land use planning has already led to significant challenges for fuel infrastructure operators.

CFA members have experienced increasing encroachment from residential and mixed-use development near critical fuel terminals in the Greater Toronto Area. These terminals operate continuously to supply the majority of fuels to the region, and their safe operation depends on maintaining appropriate buffers and compatible surrounding land uses.

Where municipal planning frameworks lack clear and mandatory direction, developments are often approved in close proximity to these facilities—introducing safety risks, operational constraints, and potential long-term supply disruptions.

This pattern reinforces that **without explicit and enforceable protections, general policy intent is insufficient**.

The removal or weakening of corridor protections—absent strengthened PPS direction—will further exacerbate these risks.

Energy corridors and protected planning frameworks serve a critical function, preserving space for existing and future infrastructure. Without these safeguards, infrastructure owners face increased risk of encroachment that compromises safe operations, reducing the ability to maintain or expand infrastructure to meet future demand. This is particularly concerning as Ontario advances fuel transition projects and invests in new energy systems, which will rely on both existing and new infrastructure coexisting within increasingly constrained land bases.

Recommendation: Maintain Corridor Protections Until the PPS Is Strengthened

Given the current imbalance in the PPS, **CFA recommends that** e**xisting corridor protections remain in place until the Provincial Planning Statement includes clear, enforceable policies requiring the protection of critical energy infrastructure.**

To address the identified gaps, CFA recommends the following changes to the PPS:

1. Introduce Explicit Protection Policies

The PPS should include clear direction that planning authorities must protect existing and planned energy infrastructure, including: refineries, pipelines and transmission systems, fuel terminals and storage facilities and distribution infrastructure

2. Use Mandatory Language (“shall”)

Where protection of infrastructure is required, policies should use “shall” rather than “should” to ensure consistent and enforceable application across all municipalities.

3. Require Compatibility and Buffers

Planning authorities should be required to prevent incompatible land uses near critical infrastructure, and maintain appropriate setbacks and buffers.

4. Recognize Energy Infrastructure as Critical Provincial Interest

Energy infrastructure should be explicitly identified as a matter of provincial interest requiring protection alongside housing and economic development objectives.

Conclusion

Ontario's economic growth and quality of life depend on reliable, safe, and resilient energy systems. While enabling development is an important objective, it must not come at the expense of infrastructure that supports that very growth.

Current PPS language does not provide adequate assurance that critical energy infrastructure will be protected. Until that gap is resolved through clear and mandatory policy direction, corridor protections remain an essential safeguard.

CFA appreciates the opportunity to provide input and would welcome further engagement to support balanced, effective land use planning in Ontario.

Sincerely,

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