



environmental
defence

May 19, 2026

Ontario Legislative Assembly Standing Committee on the Interior
Whitney Block, Room 1405
99 Wellesley Street W Toronto, ON M7A 1A2

Via Email: sci@ola.org

Attention Clerk Khan, Chair Babikian, Vice Chairs Mamakwa and Tsao, and Committee members,

Re: *Bill 110, “Building Billy Bishop Airport Act, 2026”.*

These are the brief, supplementary written submissions from Environmental Defence regarding the proposed Bill 110, which the government has entitled the “*Building Billy Bishop Airport Act, 2026*”. While Environmental Defence has strong substantive objections to this legislation and its impacts upon the public interest, those objections are addressed in the oral testimony of Norman Di Pasquale, Chair of NoJetsTO, presented to you in person on May 19th.

Not Limited to the Airport

Contrary to the way it has been presented to the public, and contrary to the impression given by its title, the *Building Billy Bishop Airport Act, 2026* is not in fact drafted specifically building, expanding or modify the Billy Bishop Airport. If you allow it to become law, this Bill would authorize one provincial cabinet Minister, Minister Sarkaria, to seize (among other lands) as much of the Toronto Island Park and Little Norway Park, and Eireann Quay as he chooses *for any purpose whatsoever*, regardless of whether the federal government actually decides to expand the airport.

The text of this new legislation simply empowers the Minister to “prescrib[e]” what parts of these lands will be “vested in the Crown ...and...under the Minister’s control” (s. 2(1)) and thereby seize “all interests in the land”, “all buildings and structures”, all “fixtures” and as well as “all additions, alterations and improvements” to any part of Toronto Island Park, Little Norway Park, and Eirann Quay.

While subsection 2(4), which establishes the geographic scope of this power, is described as pertaining to “Billy Bishop Toronto City Airport land”, neither that section nor any other part of the Act would limit the Minister’s power to seize lands to land actually *required* or in anyway useful for the purposes of expanding an airport.

The proposed language of this power to take land is so broad that it would let the Minister:

- seize Centre Island and Centreville, including any and all City owned rides and animal enclosures and gardens, and sell them to a private company

- seize and shut down Hanlan's Point Beach, or
- Privatize Wards Island Beach

If this Bill were really specifically about facilitating expansion of the airport, the government would not be introducing it now - when there's no reason to expect that an airport will be proposed, approved, or built. It would be waiting for the *federal* government, which controls the Billy Bishop Toronto City Airport, to decide whether it even wants to propose any such expansion. It would be waiting to see whether the federal government actually lifts the ban on jets. It would be waiting to see whether, and in what specific form, any airport expansion can be authorized in compliance with federal health, environmental and safety regulations. It would be introduced only *after* all those processes had been completely, and strictly limit any takings of land to those which the process identified as necessary for the specific work approved.

Sincerely,

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

Phil Pothen, J.D., M.L.A.
Counsel, Ontario Environment Program Manager,
and Land Use and Land Development Program Manager
Environmental Defence