

Corporate Services Committee

Report

1st Meeting of the Corporate Services Committee
November 28, 2022

PRESENT: Councillors S. Lewis (Chair), H. McAlister, S. Stevenson, S. Trosow, D. Ferreira, Mayor J. Morgan

ALSO PRESENT: Councillor J. Pribil; A. Job, K. Mason, K. Scherr, B. Westlake-Power

Remote Attendance: L. Livingstone, L. Amaral, A. Barbon, B. Card, I. Collins, S. Corman, J. Dann, M. Goldrup, A. Hagan, A. Hovius, P. Kokkoros, S. Mathers, C. McCreery, M. McErlain, K. Murray, J. Senese, S. Swance, S. Tatavarti, B. Warner, K. Wilding, J. Wills, P. Yeoman

The meeting is called to order at 12:00 PM.

1. Call to Order

1.1 Disclosures of Pecuniary Interest

That it BE NOTED that no pecuniary interests were disclosed.

1.2 Election of Vice Chair

Moved by: H. McAlister

Seconded by: D. Ferreira

That Councillor S. Trosow BE APPOINTED Vice Chair for the term ending November 14, 2023.

Yeas: (6): S. Lewis, H. McAlister, S. Stevenson, S. Trosow, D. Ferreira, and Mayor J. Morgan

Motion Passed (6 to 0)

2. Consent

Moved by: H. McAlister

Seconded by: S. Trosow

That consent items 2.1 to 2.8, BE APPROVED.

Yeas: (6): S. Lewis, H. McAlister, S. Stevenson, S. Trosow, D. Ferreira, and Mayor J. Morgan

Motion Passed (6 to 0)

2.1 Authorization for Temporary Borrowing

Moved by: H. McAlister

Seconded by: S. Trosow

That, on the recommendation of the Deputy City Manager, Finance Supports, the proposed by-law as appended to the staff report dated November 28, 2022 as Appendix "A" BE INTRODUCED at the Municipal Council meeting on December 13, 2022, to authorize the temporary borrowing of certain sums to meet current expenditures of The Corporation of the City of London for the year 2023.

Motion Passed

2.2 Amendments to the Travel and Business Expenses Council Policy

Moved by: H. McAlister

Seconded by: S. Trosow

That, on the recommendation of the Deputy City Manager, Finance Supports, the proposed by-law as appended to the staff report dated November 28, 2022 as Appendix “A” BE INTRODUCED at the Municipal Council meeting to be held on December 13, 2022 to amend By-law No. CPOL.-227-479 being “A by-law to revoke and repeal Council policy related to Travel & Business Expenses and replace it with a new Council policy entitled Travel & Business Expenses” to repeal and replace Schedule “A” to the by-law.

Motion Passed

2.3 2021 Annual Reporting of Lease Financing Agreements

Moved by: H. McAlister

Seconded by: S. Trosow

That, on the recommendation of the Deputy City Manager, Finance Supports, the 2021 Annual Reporting of Lease Financing Agreements report BE RECEIVED for information.

Motion Passed

2.4 Expropriation of Lands - Wellington Gateway Project Phase 1

Moved by: H. McAlister

Seconded by: S. Trosow

That, on the recommendation of the Deputy City Manager, Environment and Infrastructure, with the concurrence of the Director, Construction and Infrastructure Services, and on the advice of the Director, Realty Services, approval be given to the expropriation of land as may be required for the Wellington Gateway Project, and that the following actions be taken in connection therewith:

a) application be made by The Corporation of the City of London as Expropriating Authority to the Council of The Corporation of the City of London as approving authority, for the approval to expropriate the land required for the Wellington Gateway project;

b) The Corporation of the City of London serve and publish notice of the above application in accordance with the terms of the *Expropriations Act*;

c) The Corporation of the City of London forward to the Chief Inquiry Officer any requests for a hearing that may be received and report such to the Council of The Corporation of the City of London for its information; and,

d) the proposed by-law as appended to the staff report dated November 28, 2022 as Schedule “B” BE INTRODUCED at the Council meeting on December 13, 2022 to authorize the foregoing and direct the Civic Administration to carry out all necessary administrative actions.

Motion Passed

2.5 Declare Surplus - City-Owned Property - Part of Emerson Avenue at Baseline Road East

Moved by: H. McAlister

Seconded by: S. Trosow

That, on the recommendation of the Deputy City Manager, Finance Supports, on the advice of the Director, Realty Services, with respect to City-owned property described as a portion of the cul-de-sac at the south end of Emerson Avenue at Baseline Road East, described as the cul-de-sac fronting on 229, 230, 233 and 238 Emerson Avenue, Plan 914 London / Westminster, more particularly described as Parts 1 and 2, Plan 33R-21319, in the City of London (the "Subject Property"), the following actions be taken:

- a) the subject property BE DECLARED SURPLUS; and,
- b) the subject property BE TRANSFERRED to the abutting property owner, London Youth for Christ, in accordance with the City's Sale and Other Disposition of Land Policy.

Motion Passed

2.6 Declare Surplus - City-Owned Property - Part of 181 Hamilton Road

Moved by: H. McAlister

Seconded by: S. Trosow

That, on the recommendation of the Deputy City Manager, Finance Supports, on the advice of the Director, Realty Services, with respect to City-owned property legally described as Part Lot 28, S Hamilton Road, N/E Grey Street, Plan 176 (E), in the City of London, County of Middlesex, being part of PIN # 08313-0062, municipally known as 181 Hamilton Road adjacent 580 Grey Street, the following actions be taken:

- a) the subject property BE DECLARED SURPLUS; and,
- b) the subject property ("Surplus Lands") BE TRANSFERRED to the abutting property owner in accordance with the City's Sale and Other Disposition of Land Policy.

Motion Passed

2.7 Declare Surplus - City-Owned Property - Part of 108 Clarke Road

Moved by: H. McAlister

Seconded by: S. Trosow

That, on the recommendation of the Deputy City Manager, Finance Supports, on the advice of the Director, Realty Services, with respect to City-owned property legally described as Part Lot 17, Plan 761 designated as Parts 1, 2, 5 and 6, Plan 33R-11453, S/T Ease over Parts 1 and 2, Plan 33R-11453 as in LT361005; London Township and Part Lot 18, Plan 761 designated as Parts 9 and 10, Plan 33R-11453 London Township, known municipally as 108 Clark Road, the following actions be taken:

- a) the subject property BE DECLARED SURPLUS; and,
- b) the subject property ("Surplus Lands") BE TRANSFERRED to the abutting property owner in accordance with the City's Sale and Other Disposition of Land Policy in exchange for lands required for road widening along Clarke Road.

Motion Passed

2.8 Human Resources Information System (HRIS) Implementation Partner
Successful Proponent – RFP 2022-080

Moved by: H. McAlister

Seconded by: S. Trosow

That, on the recommendation of the Deputy City Manager, Enterprise Supports, with the concurrence of representatives from Information Technology Services and Finance Supports, the following actions be taken with respect to the SAP SuccessFactors, Human Resources Information Systems (HRIS) Implementation:

a) the proposal for implementation partnership, submitted by Price Waterhouse Coopers LLP (PWC), 99 Bank Street, Suite 710, Ottawa, Ontario, K1P 1E4 BE ACCEPTED in accordance with the Procurement of Goods and Services Policy;

b) the financing for this project BE APPROVED as set out in the Sources of Financing Report as appended to the staff report dated November 28, 2022 as Appendix "A";

c) the Civic Administration BE AUTHORIZED to undertake all administrative acts that are necessary in connection with this purchase; and,

d) the approval hereby given BE CONDITIONAL upon the City of London (The Corporation) entering a formal contract, agreement or having a purchase order relating to the subject matter of this approval.

Motion Passed

3. Scheduled Items

None.

4. Items for Direction

4.1 Not to be heard before 12:05 PM - Tribunal - Development Charge Appeal

Moved by: S. Trosow

Seconded by: S. Stevenson

That, after convening as a tribunal under section 26 of By-law C.P.-1551-337 to hear a complaint under section 20 of the Development Charges Act 1997, S.O. 1997, c. 27, by Neil M. Smiley, Fasken Martineau DuMoulin LLP of the property located at 2365 Innovation Drive, regarding the development charges being appealed, as the amount should be adjusted to reflect the Industrial Development Charge rate and not Commercial on the subject property, as detailed in the attached Record of Proceeding, on the recommendation of the Tribunal, the complaint BE DISMISSED on the basis that the Tribunal finds that the amount of the development charge being applied were correctly determined and no error occurred in the application of the Development Charges By-law.

Yeas: (6): S. Lewis, H. McAlister, S. Stevenson, S. Trosow, D. Ferreira, and Mayor J. Morgan

Motion Passed (6 to 0)

Moved by: S. Stevenson

Seconded by: S. Trosow

That the Corporate Services Committee now convene as a tribunal under section 26 of By-law C.P.-1551-337 to hear a complaint under section 20 of the *Development Charges Act, 1997* and provide the complainant an opportunity to make representations.

Yeas: (6): S. Lewis, H. McAlister, S. Stevenson, S. Trosow, D. Ferreira, and Mayor J. Morgan

Motion Passed (6 to 0)

Moved by: D. Ferreira

Seconded by: S. Stevenson

That the meeting of the Tribunal, under Section 26 of By-law C.P.-1551-337 BE ADJOURNED and the meeting of the Corporate Services Committee BE RESUMED.

Yeas: (6): S. Lewis, H. McAlister, S. Stevenson, S. Trosow, D. Ferreira, and Mayor J. Morgan

Motion Passed (6 to 0)

5. Deferred Matters/Additional Business

None.

6. Confidential (Enclosed for Members only.)

Moved by: S. Stevenson

Seconded by: D. Ferreira

That the Corporate Services Committee convenes in Closed Session to consider the following:

6.1. Labour Relations/Employee Negotiations

A matter pertaining to reports, advice and recommendations of officers and employees of the Corporation concerning labour relations and employee negotiations in regard to one of the Corporation's unions including communications necessary for that purpose and for the purpose of providing instructions and direction to officers and employees of the Corporation.

6.2. Land Disposition / Solicitor-Client Privileged Advice / Position, Plan, Procedure, Criteria or Instruction to be Applied to Any Negotiations

A matter pertaining to the proposed or pending disposition of land by the municipality, including communications necessary for that purpose; advice that is subject to solicitor-client privilege; commercial and financial information, that belongs to the municipality and has monetary value or potential monetary value and a position, plan, procedure, criteria or instruction to be applied to any negotiations carried on or to be carried on by or on behalf of the municipality.

6.3. Land Acquisition / Solicitor-Client Privileged Advice / Position, Plan, Procedure, Criteria or Instruction to be Applied to Any Negotiations

A matter pertaining to the proposed or pending acquisition of land by the municipality, including communications necessary for that purpose; advice that is subject to solicitor-client privilege; commercial and financial information, that belongs to the municipality and has monetary value or potential monetary value and a position, plan, procedure, criteria or instruction to be applied to any negotiations carried on or to be carried on by or on behalf of the municipality.

6.4. Land Acquisition / Solicitor-Client Privileged Advice / Position, Plan, Procedure, Criteria or Instruction to be Applied to Any Negotiations

A matter pertaining to the proposed or pending acquisition of land by the municipality, including communications necessary for that purpose; advice that is subject to solicitor-client privilege; commercial and financial information, that belongs to the municipality and has monetary value or potential monetary value and a position, plan, procedure, criteria or instruction to be applied to any negotiations carried on or to be carried on by or on behalf of the municipality.

6.5 Land Acquisition/Disposition / Solicitor-Client Privileged Advice / Position, Plan, Procedure, Criteria or Instruction to be Applied to Any Negotiations

A matter pertaining to the proposed or pending lease of City-owned land by a third party, including communications necessary for that purpose; advice that is subject to solicitor-client privilege; commercial and financial information, that belongs to the municipality and has monetary value or potential monetary value and a position, plan, procedure, criteria or instruction to be applied to any negotiations carried on or to be carried on by or on behalf of the municipality.

Yeas: (6): S. Lewis, H. McAlister, S. Stevenson, S. Trosow, D. Ferreira, and Mayor J. Morgan

Motion Passed (6 to 0)

The Corporate Services Committee convenes in Closed Session from 1:07 PM to 1:39 PM.

7. Adjournment

Moved by: D. Ferreira

Seconded by: S. Stevenson

That the meeting BE ADJOURNED.

Motion Passed

The meeting adjourned at 1:42 PM.

RECORD OF PROCEEDING

CORPORATE SERVICES COMMITTEE

convening as a Tribunal under section 26 of By-law C.P.-1551-227 to hear a complaint under section 20 of the *Development Charges Act*, 1997, S.O. 1997, c.27 by Neil M. Smiley, Fasken Martineau DuMoulin LLP, regarding the development charges imposed by The Corporation of the City of London in connection with development on the land known as 2365 Innovation Drive.

November 28, 2022 – 12:05 PM
Council Chambers
London City Hall

PRESENT

Councillor S. Lewis, Chair
Councillor H. McAlister Tribunal Member
Councillor S. Stevenson, Tribunal Member
Councillor S. Trosow, Tribunal Member
Councillor D. Ferreira, Tribunal Member
B. Westlake-Power, Registrar
P. Kokkoros, Director, Building and Chief Building Official
K. Wilding, Manager, Plans Examination
A. Hovius, Solicitor II
N. M. Smiley, Fasken Martineau DuMoulin LLP, Complainant
W. Shaffer, EEC Environmental
K. Wagner, UniFirst Canada Ltd.

CALL TO ORDER

The Chair called the Tribunal to order at 12:21 PM on November 28, 2022.

DECLARATIONS OF PECUNIARY INTEREST

None.

HEARING

Hearing before the Corporate Services Committee (CSC), convening as a Tribunal under section 20 of the *Development Charges Act*, 1997, S.O. 1997, c. 27, with respect to the development charge imposed by The Corporation of the City of London in connection with development on the land known as 2365 Innovation Drive.

1. Preliminary and Interlocutory Matters:

The Chair provided a brief overview and explanation of the Hearing process.

P. Kokkoros, Director, Building and Chief Building Official, K. Wilding, Manager, Plans Examination and A. Hovius, Solicitor were in attendance on behalf of the City of London.

Neil M. Smiley, Fasken Martineau DuMoulin LLP, W. Shaffer, EED Environmental and K. Wagner, UniFirst Canada Ltd. were in attendance on behalf of the Complainant.

2. Summary of the Evidence Received by the Tribunal:

The following attached documents were submitted as Exhibits at the Hearing:

Exhibit #1: Notice of Hearing dated November 14, 2022;

Exhibit #2: Written complaint from Neil M. Smiley, Fasken Martineau DuMoulin LLP, emailed on September 16, 2022;

Exhibit #3: Staff report dated November 28, 2022 from the Deputy City Manager, Planning and Economic Development;

Exhibit #4: Presentation dated November 28, 2022 from Neil M. Smiley, Fasken Martineau DuMoulin LLP, included on the Added Agenda.

Mr. Smiley presented information to the Tribunal demonstrating that the operations being undertaken by UniFirst at the location are in fact industrial uses, not commercial. This information is outlined in Exhibits #2 and #4.

It was noted by the Complainant that the application of the commercial rate for the application was incorrectly applied; that the Development Charge should have been calculated on the industrial rate, in accordance with the production/work on the site as well as the property zoning.

There were questions from the Committee for the complainant, primarily related to the intended use of the property. W. Shaffer and K. Wagner assist with the responses.

Mr. Kokkoros provided introductory remarks on behalf of the City of London, including an acknowledgement of the significance of the development.

Mr. Wilding provided background with respect to the criteria used for the development charge calculation associated with the application for 2365 Innovation Drive. Noting the definitions of “industrial” in the Development Charges By-law do not apply to UniFirst and recommending dismissal of the complaint.

There were no questions from the Committee for the Civic Administration.

The Chair asked the Complainant whether there was any new information to present, based on the submissions and presentation of the Civic Administration. Mr. Smiley reiterates the position of UniFirst and indicates the definition for “industrial” is broader than what staff have provided. UniFirst is certainly producing goods with the work that they conduct.

The Chair asked the Tribunal Members if there was a need to go in closed session to receive legal advice regarding the matter. There was no request from the Tribunal Members to convene in closed session.

The following recommendation is passed.

RECOMMENDATION:

That, convening as a tribunal under section 27 of Part IV of By-law C.P.-1496-244 to hear a complaint under section 20 of the *Development Charges Act 1997*, S.O. 1997, c. 27, by Neil M. Smiley, Fasken Martineau DuMoulin LLP, the property located at 2365 Innovation Drive, regarding the development charges being appealed, for 2365 Innovation Drive on the subject property, as detailed in this Record of Proceeding, on the recommendation of the Tribunal, the complaint BE DISMISSED on the basis that the Tribunal finds that the amount of the development charge being applied were correctly determined and no error occurred in the application of the Development Charges By-law.

ADJOURNMENT

The Tribunal adjourned at 1:15 PM.



300 Dufferin Avenue
P.O. Box 5035
London, ON
N6A 4L9

London
CANADA

November 14, 2022

UniFirst Canada Ltd.
c/o Frasken Martineau DeMoulin LLP
333 Bay Street, Suite 2400
P.O. Box 2400
Toronto, Ontario M5H 2T6

Attn: Neil M. Smiley (nsmiley@fasken.com)

Dear Mr. Smiley,

Re: Development Charges Appeal – UniFirst Canada Ltd.

Notice is hereby given that the development charges complaint, with respect to the calculation of development charges and the application of the development charge by-law for the UniFirst Building Permit 21-030285, will be heard by the Corporate Services Committee on Monday, November 28, 2022, not before 12:05 PM.

This meeting will be held in the Council Chambers, City Hall, 300 Dufferin Avenue, London, but will also be hosted virtually. Please confirm with the undersigned how you would like to participate in the meeting.

You will be given the opportunity to make representations, either in person, or virtually, to the Corporate Services Committee at this meeting about the complaint. A copy of the staff report associated with this matter will be provided under separate cover and be included on the Committee Agenda of November 28, 2022.

If you have any questions regarding this hearing, please contact Barb Westlake-Power at 519 661-2489, Ext. 5391.

Barb Westlake-Power
Deputy City Clerk

- c. R. Montgomery, UniFirst Corporation (by email)
B. Card
A. Anderson
S. Mathers
P. Kokkoros
Chair and Members, Corporate Services Committee

Fasken Martineau DuMoulin LLP
Barristers and Solicitors
Patent and Trade-mark Agents

333 Bay Street, Suite 2400
P.O. Box 20
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+1 800 268 8424
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fasken.com

September 16, 2022
File No.: 218183.00967/11889

Neil M. Smiley
Direct +1 416 865 5122
nsmiley@fasken.com

By Email

City of London
300 Dufferin Avenue
P.O. Box 5035
London, Ontario
N6A 4L9

Attention: Corporate Services Committee c/o Najah Kishawi-Support Clerk nkishawi@london.ca

Dear Sirs/Madams:

Re: Letter of Complaint/Protest in respect of the Development Charges (City Services) being required by the City of London to be paid in connection with the issuance of Building Permit 21-030285 concerning the development of property owned by UniFirst Canada Ltd. located at 2365 Innovation Drive, City of London (the “Property”)

We act on behalf of Unifirst Canada Ltd. (“**UniFirst**”) in connection with its development of an industrial laundering and cleaning facility at the above-noted Property (the “**Project**”). Under a Customer Invoice dated Friday September 9, 2022, a copy of which is attached as Schedule A (the “**Customer Invoice**”), the City of London has invoiced UniFirst’s contractor, Arco/Murray International Construction Company, ULC, for payments, including Development Charges, that it requires be paid prior to the issuance of a building permit arising from Building Permit Application No 21-030285 for the Project.

UniFirst does not agree with, and this letter shall serve as notice of Unifirst’s complaint and protest (“**Notice of Complaint**”) in respect of the imposition for the Project of a Development Charges Rates applicable to “Commercial Development” as defined under City of London By-law No. C.P. 1551-227 (the “**DC By-Law**”). It is UniFirst’s respectful submission that its use of the Property should attract/invoke the Development Charges Rate for “Industrial Development” as provided for in the DC By-law. Accordingly, in accordance with Section 20 of the Development Charges Act, 1997 and Section 26 of the City of London’s DC By-law, we hereby file, on behalf of UniFirst as “Complainant”, the within Notice of Complaint to the City of London under Part IV of the DC By-law.

1. The Complainant: UniFirst Canada, Ltd.
2. Address of Service for Complainant: 3067 E. Commerce, San Antonio, TX 78220
Attention: Rick Montgomery Email: RMontgomery@unifirst.com
3. Grounds for Complaint: The amount of the development charge was incorrectly determined; and or there was an error in the application of the DC By-law as summarized below:

(i) UniFirst operates as an industrial launderer, whereby it will use the premises primarily for receiving from an industrial depot, bulk soiled uniforms and other industrial wear, which it industrially launders and has delivered for re-use to the industrial user. Other industrial processing occurs such as labelling and dyeing.

(ii) The building use proposed for the Project does NOT conform to the definition of a “Commercial Development” as set out in the DC By-law since it is not one of the listed uses in paragraph (a) of the definition of Commercial Development. The building will in no way be used for “retail purposes including.....articles or things for sale or rental directly to the public...” as provided for in paragraph (b) of the said definition. There are absolutely no sales at retail of any product or service to the public and no transactions of any sort will be occurring in the premises of a nature contemplated by paragraph (a) or (b) of the definition of “Commercial Development”. Moreover, there will be no delivery to the general public from the facility.

(iii) While “laundries” is a listed purpose in paragraph (b) of the definition of “Commercial Development”, it needs to be read in the context of the paragraph it resides in, such that the retail purpose is “for sale or rental directly to the public”. The word “laundries” is intended to mean public-facing laundromats or similar operations serving the public, not industrial laundering facilities. UniFirst processed a Minor Zoning Variance for this Project to make this distinction of its use within its Light Industrial zoning designation.

(iv) Pursuant to the definition in the DC By-law of “Industrial Development”, paragraph (b): (a) UniFirst will receive raw materials and semi-processed goods (garments, mats, etc. manufactured by UniFirst and others) to the Property and process (wash, dye, label, etc.) and package these materials and goods to provide to industry (not the general public); and (b) UniFirst will also store and distribute such goods and materials which includes “operation of a truck terminal, warehouse”. Again, this does not include retail sale of goods to the public.

(v) UniFirst is classified as an “Industrial Launderer” under NAICS Code 812332 and SIC Code 7218. These are industrial classifications, not commercial.

(vi) The Property is zoned for “Industrial” uses not retail/commercial uses and the Building Occupancy classification of Group F, Division 2 is “Medium Hazard Industrial Occupancies” (per Building Code §9.10.2).

(vii) With no retail activity by way of sale or rental to the public intended to take place at the Property, it is discriminatory and prejudicial to impose, for the purposes of development charges payable under the DC-Law, a classification of “Commercial Development” in respect of the Project which will have the effect of increasing the applicable development charges by \$544,671, being the difference between the rate applicable to “Industrial Development” of \$1,352,366 and the rate applicable to “Commercial Development” of \$1,897,037.

Conclusion:

In light of the grounds cited above and such further grounds that may be asserted on the hearing of the complaint before the City of London’s Corporate Services Committee, City Council or on a further appeal, we respectfully submit that: (i) the amount of the Development Charge for the Project was incorrectly determined; and/or (ii) there was an error in the application of the DC By-law as set out in Section 20 of the Development Charges Act, 1997 and Section 27(1) and 27(2) in the DC By-law. The proposed use for an industrial laundering facility, not offering for sale or

rental directly to the public, is not properly characterized as a Commercial Development but more appropriately, should be classified as an Industrial Development for the purposes of calculating the applicable development charge under the DC By-law.

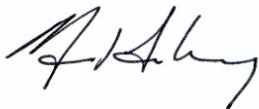
In order to continue with the Project and not cause any further delays, our client requires to urgently procure its building permit. Accordingly, it is contemporaneously paying under protest the amount of \$1,897,037 identified in its Customer Invoice in respect of Development Charges for the Project as it is of the view the applicable development charge amount should be \$1,352,366, being the development charge applicable to "Industrial Development". In dispute under this Notice of Complaint and being protested is the payment of the amount of \$544,671 under the Customer Invoice, which amount Unifirst requests be refunded as part of the determination of its complaint, together with interest as contemplated by Section 25 of the Development Charges Act, 1997.

In accordance with Section 20 of the Development Charges Act, 1997 and Section 30 of the DC By-law, we request that the City and/or its Corporate Services Committee hold a hearing into the within complaint, provide Unifirst (and the undersigned) notice of the hearing and an opportunity to make representations.

Please provide UniFirst and the undersigned with notice of any future proceedings in connection with this complaint.

Yours truly,

FASKEN MARTINEAU DuMOULIN LLP



Neil M. Smiley

NMS/kh

cc. Peter Kokkoros, Director, Building and Chief Building Official Building Division, Planning and Economic Development, City of London – pkokkoro@london.ca

Rick Montgomery, UniFirst Corporation – Rick_Montgomery@unifirst.com

Will Shaffer, EEC Environmental – WShaffer@eecenvironmental.com

SCHEDULE A
CUSTOMER INVOICE



300 Dufferin Avenue
P.O. Box 5035
LONDON, ON
N6A 4L9

Customer Invoice

Friday, September 9, 2022

RE: Permit Application 21-030285 2365 Innovation Drive Dry Cleaning and Laundry Depot Erect

STEVE LANE
ARCOMURRAY INTERNATIONAL CONSTRUCTION COMPANY, ULC
3110 WOODCREEK DR DOWNERS GROVE IL 60515 USA

The review of your permit is now complete. The table below itemizes applicable fees that must be paid in full before the permit can be issued. Fees included in Sub-total 1 must be paid within five (5) business days from the date of this notice. Failure to do so will result in cancellation of the permit application, in accordance with the provisions of the Building By-law. The development charges amount shown below is subject to adjustment based on the rates in effect the day the permit is being issued (See Note below).

Payment can be made by cheque or online using your financial institution's banking service. Payments by cheque can be mailed or delivered to the City Hall Building Division.

If you are submitting payment using an online banking service, please follow the steps below:

- 1) Check box to indicate payment option selected (Fee Subtotal 1 or Total Fees) and save this document.
- 2) Using your email program, click "Reply to All", attach the saved document and click "Send".

Permit Fee	
Construction Water Fee	\$987.94
Water Meter Fee (Remote)	

Fees Sub-total 1:	\$987.94
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☐ PAID

Development Charges (City Services)	\$1,897,037.50
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Fees Sub-total 2:	\$1,897,037.50
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Total Fees:	\$1,898,025.44
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☐ PAID

Note: Per section 4 of the Development Charges By-law: "...For all development types, unless application is made under a Site Plan or a Zoning By-law Amendment, a Development Charge under section 2 shall be calculated on the date a building permit is issued under the *Building Code Act*...", the fees provided above, unless the application is made under a Site Plan or a Zoning By-law Amendment, must be paid prior to January 1st. Fees paid after January 1st would be reassessed and adjusted based on the Development charge rates in effect after January 1st.

Please disregard this notice if payment has already been made

Miguel Mendoza, Plan Examiner
(519) 661-2489 Ext 5079

The Corporation of the City of London
Building Division, Room 708
300 Dufferin Ave. London ON N6A 4L9
Office: 519-661-4555

www.london.ca

Report to Planning & Environment Committee

To: Chair and Members
Corporate Services Committee
From: Scott Mathers, MPA, P. Eng
Deputy City Manager, Planning and Economic Development
Subject: Development Charge Complaint
2365 Innovation Drive
Date: November 28, 2022

Recommendation

That, on the recommendation of the Director, Building and Chief Building Official, the Development Charges complaint submitted by Mr. Neil M. Smiley of Fasken Martineau DuMoulin LLP, related to development at the property situated at 2365 Innovation Drive, **BE DISMISSED.**

Executive Summary

A building permit application was received on November 3, 2021, for the erection of a new laundry facility. A foundation permit was issued on September 22, 2022. A complaint letter from Mr. Neil M. Smiley of Fasken Martineau DuMoulin LLP with respect to Development Charges paid (hereinafter referred to as the 'Complaint'), was received on September 14, 2022, and is included in Appendix 'A' of this report.

The Development Charges were assessed by staff using the Commercial rate.

The aforementioned letter makes mention of various reasons as to why the requested Development Charges amount should be adjusted to reflect the Industrial Development Charge rate and not Commercial.

Linkage to the Corporate Strategic Plan

Growing our Economy

- London is a leader in Ontario for attracting new jobs and investments.

Leading in Public Service

- The City of London is trusted, open, and accountable in service of our community.
- Improve public accountability and transparency in decision making.

Analysis

1.0 Background Information

A complaint letter from Mr. Neil M. Smiley of Fasken Martineau DuMoulin LLP, on behalf of UniFirst Canada Ltd. (the "Complainant"), with respect to Development Charges paid for the erection of a new building was received on September 14, 2022, and is included in Appendix 'A' of this report.

The letter makes mention of various reasons as to why the requested Development Charges amount should be adjusted to reflect the Industrial Development Charge rate and not Commercial. In summary, the following reasons have been listed:

1. UniFirst operates as an Industrial launderer.
2. The building does not conform to the definition of 'Commercial Development'.
3. A Minor Variance was processed to conform to 'Light Industrial' zoning designation.
4. UniFirst provides services to industry and not the general public.

5. UniFirst is classified as an 'Industrial Launderer' under NAICS Code 812332 and SIC Code 7218.
6. The property is zoned for Industrial Uses and the Ontario Building Code classifies the building as 'Industrial'.
7. No retail activities by way of sale or rental to the public at the property.

A site plan depicting the proposed development is provided in Appendix 'B'.

The proposed building has a gross floor area of 5,875 sq.m and the development charges were calculated by staff at the Commercial development charge rate of \$322.19 per sq.m. The total development charge amount due was calculated at \$1,897,037.50.

2.0 Discussion and Considerations

Building Uses per the Development Charges By-law

In determining the appropriate development charge, it is important to determine the building's use. Part I, section 1 of the Development Charges By-law C.P.-1551-227 (the "DC By-law") provides the definitions of various building uses which are then used to determine the appropriate development charge rate for the proposed building. Industrial development is defined as:

"Industrial Development" is a building used for:

a) manufacturing, producing, fabricating, assembling, compounding or processing of raw materials, goods, component parts or ingredients where the physical condition of such materials, goods, parts or components is altered to produce a finished or semi-finished tangible product, or the packaging, crating, bottling, of semi-processed goods or materials, but not including any of these activities where they primarily serve retail purposes to the general public;

b) storing or distributing something derived from the activities mentioned in a) above and for greater certainty, shall include the operation of a truck terminal, warehouse or depot and does not include self-storage warehousing for use by the general public or retail sales associated with the goods stored or distributed, or accessory storage of a Commercial Development;

c) research or development in connection with activities mentioned in (a) above;

d) retail sales of goods produced by activities mentioned in section a) at the site where the manufacturing, producing or processing from raw materials or semi-processed goods takes place and for greater certainty, includes the sale of goods or commodities to the general public where such sales are accessory or secondary to the Industrial use, and does not include the sale of goods or commodities to the general public through a warehouse club;

e) office or administrative purposes, if they are carried out:

i) with respect to the activity mentioned in section (a), and

ii) in or attached to the building or structure used for activities mentioned in section a) and

iii) for greater certainty, shall include an office building located on the same property as, and used solely to support, the activities mentioned in section a);

f) a business that stores and processes data for retrieval, license or sale to end users and are on lands zoned for Industrial uses; or

g) businesses that develop computer software or hardware for license or sale to end users that are on lands zoned for Industrial uses; and

h) Industrial Use shall have the corresponding meaning;

Part I, section 1 of the DC By-law describes commercial development, in part, as:

“Commercial Development” is a building used for:

*b) Retail purposes including activities of offering foods, wares, merchandise, substances, articles or things for sale or rental directly to the public and includes offices and storage within the same building, which support, are in connection with, related or ancillary to such uses, or activities providing entertainment and recreation. **Retail purposes shall include but not be limited to:** conventional restaurants; fast food restaurants; night clubs, concert halls, theatres, cinemas, movie houses, and other entertainment related businesses; automotive fuel stations with or without service facilities; special automotive shops/vehicle repairs/collision services/car or truck washes; vehicle dealerships; commercial truck service establishments, regional shopping centres; community shopping centres; neighbourhood shopping centres, including more than two stores attached and under one ownership; department/discount stores; banks and similar financial institutions, including credit unions (excluding freestanding bank kiosks), money handling and cheque cashing facilities; warehouse clubs or retail warehouses; food stores, pharmacies, clothing stores, furniture stores, department stores, sporting goods stores, appliance stores, garden centres (but not a garden centre defined as exempt under section 35 of this By-law), government owned retail facilities, private daycare, private schools, private lodging and retirement homes, private recreational facilities, sports clubs, golf courses, skiing facilities, race tracks, gambling operations, funeral homes, motels, hotels, restaurants, theatres, facilities for motion picture, audio and video production and distribution, sound recording services, passenger stations and depots, dry cleaning establishments, **laundries**, establishments for commercial self-service uses, automotive recycling/wrecking yards, kennels. (emphasis added)*

The proposed building is to be used to launder materials that were not manufactured in the building. The definition of “Commercial Development” per the DC By-law includes laundries as part of the definition for commercial development. On this fact alone the “Commercial Development” definition is satisfied, and the commercial development charge rate would be applied.

Calculation of Development Charges: Other Considerations

Even if the laundries were not specifically listed, the definition of Commercial Development provides examples of uses and does not limit the types of uses included in that definition. This is reflected in the commercial development definition:

(b) “Retail purposes shall include but not be limited to:”

The definition does not provide all possible commercial development scenarios, but rather provides examples of uses.

Conversely, the definition for ‘Industrial Development’ is restrictive. This definition lists specific uses and does not provide for a “catch all” to reflect similar uses. It is restricted to only those uses listed.

Staff are of the opinion that the proposed use at 2365 Innovation Drive does not conform to the definition of ‘Industrial Development’ for the following reasons:

1. To be considered as an industrial development, the definition outlines that the physical condition of materials, goods, parts or components are altered to produce a finished or semi-finished tangible product.
2. There are no processes whereby raw materials will be physically altered to produce a finished or semi-finished tangible product.
3. The services provided are done so with respect to cleaning/processing items previously manufactured and as such, align with the use of a laundry as provided in the definition of Commercial development.

The proposed building is to be used to launder materials that were not manufactured in the building. There is no new product being manufactured or produced; therefore the industrial development definition is not satisfied.

The Development Charges By-law's Relationship to Other Legislation

It should be noted that the DC By-law is independent of any other legislation, other than the *Development Charges Act, 1997*, S.O. 1997, c. 27 (the "Act"). Unlike the O. Reg. 332/12 under the *Building Code Act, 1992*, S.O. 1992, c. 23 (the "Building Code") that references other 'applicable law', the DC By-law is not bound by any other by-laws or regulations.

The City of London's Zoning By-law may classify a property whereby industrial uses are permitted. However, under the 'Light Industrial' zone (section 40 of the Zoning By-law), as an example, the following uses are permitted:

3) **LI3** *The following are permitted uses in the LI3 Zone variation: a) Assembly halls; b) Commercial recreation establishments; c) Day care centres; d) Private clubs; e) Private parks.*

4) **LI4** *The following are permitted uses in the LI4 Zone variation: a) Any use permitted in the LI1 Zone variation; b) Automotive uses, restricted; c) Clinics; d) Convenience service establishments; e) Convenience stores; f) Day care centres; g) Financial institutions; h) Medical/dental offices; i) Personal service establishments; j) Restaurants.*

5) **LI5** *The following are permitted uses in the LI5 Zone variation: a) Hotels; b) Motels.*

The fact that the above uses are permitted in the light industrial zone, does not constitute their use to be classified as 'Industrial' under the DC By-law. For example, a restaurant or a daycare centre, as permitted above, are not Industrial uses under the DC By-law.

While it is appreciated that other regulations (not associated with the DC By-law) may classify the proposed building as an Industrial Laundry facility, it is the DC By-law alone that applies to calculating the charge. As previously stated, laundries fall under the Commercial Development definition and the applicable commercial rate was used to calculate the charge.

Development Charges By-law and Grounds for Complaints

Part IV, s.27 of the DC By-law provides the following grounds for a complaint:

7. Grounds of Complaint

An Owner may complain in writing to the Corporate Services Committee (with a copy provided to the Chief Building Official) upon such grounds as are established by and in accordance with the Development Charges Act in respect of the Development Charge imposed by the City:

1. *that the amount of the Development Charge was incorrectly determined;*
2. *whether a credit is available to be used against the Development Charge, or the amount of the credit or the service with respect to which the credit was given, was incorrectly determined; or*
3. *that there was an error in the application of this By-law.*

In reviewing the three grounds above, it is staff's position that the amount of the development charge was correctly determined. Regarding item 1 noted above, the development charge rate used was that in effect at the time the permit was ready to be issued and was calculated in accordance with section 4 of the DC By-law and the Act. Regarding item 2, there was no credit due against the development charges. Staff are also of the opinion that there was no error in the application of the DC By-law itself addressing item 3.

Staff maintain that the development charge amount was properly determined under the DC By-law in force and effect at the time when the building permit was ready to be issued and therefore recommends dismissal of the complaint.

Conclusion

The letter submitted by the Complainant suggests that the development charge amount should be based on the Industrial use as opposed to the Commercial use of the new building to be erected at 2365 Innovation Drive.

The proposed use does not conform to the definition of Industrial development as per the DC By-law.

It is the Chief Building Official's opinion that the Development Charges were correctly determined, and that the Complaint should be dismissed.

The assistance provided by Aynsley Anderson, Solicitor II and Kyle Wilding, Manager Plans Examination, is acknowledged.

Prepared by: **Peter Kokkoros, P.Eng**
 Director, Building and Chief Building Official
 Planning and Economic Development

Submitted &
Recommended by: **Scott Mathers, MPA, P.Eng**
 Deputy City Manager, Planning and Economic Development

APPENDIX “A”

Fasken Martineau DuMoulin LLP
Barristers and Solicitors
Patent and Trade-mark Agents

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fasken.com

September 16, 2022
File No.: 218183.00967/11889

Neil M. Smiley
Direct +1 416 865 5122
nsmiley@fasken.com

By Email

City of London
300 Dufferin Avenue
P.O. Box 5035
London, Ontario
N6A 4L9

Attention: Corporate Services Committee c/o Najah Kishawi-Support Clerk nkishawi@london.ca

Dear Sirs/Madams:

Re: Letter of Complaint/Protest in respect of the Development Charges (City Services) being required by the City of London to be paid in connection with the issuance of Building Permit 21-030285 concerning the development of property owned by UniFirst Canada Ltd. located at 2365 Innovation Drive, City of London (the “Property”)

We act on behalf of Unifirst Canada Ltd. (“UniFirst”) in connection with its development of an industrial laundering and cleaning facility at the above-noted Property (the “Project”). Under a Customer Invoice dated Friday September 9, 2022, a copy of which is attached as Schedule A (the “Customer Invoice”), the City of London has invoiced UniFirst’s contractor, Arco/Murray International Construction Company, ULC, for payments, including Development Charges, that it requires be paid prior to the issuance of a building permit arising from Building Permit Application No 21-030285 for the Project.

UniFirst does not agree with, and this letter shall serve as notice of Unifirst’s complaint and protest (“Notice of Complaint”) in respect of the imposition for the Project of a Development Charges Rates applicable to “Commercial Development” as defined under City of London By-law No. C.P. 1551-227 (the “DC By-Law”). It is UniFirst’s respectful submission that its use of the Property should attract/invoke the Development Charges Rate for “Industrial Development” as provided for in the DC By-law. Accordingly, in accordance with Section 20 of the Development Charges Act, 1997 and Section 26 of the City of London’s DC By-law, we hereby file, on behalf of UniFirst as “Complainant”, the within Notice of Complaint to the City of London under Part IV of the DC By-law.

1. The Complainant: UniFirst Canada, Ltd.
2. Address of Service for Complainant: 3067 E. Commerce, San Antonio, TX 78220
Attention: Rick Montgomery Email: RMontgomery@unifirst.com
3. Grounds for Complaint: The amount of the development charge was incorrectly determined; and or there was an error in the application of the DC By-law as summarized below:

(i) UniFirst operates as an industrial launderer, whereby it will use the premises primarily for receiving from an industrial depot, bulk soiled uniforms and other industrial wear, which it industrially launders and has delivered for re-use to the industrial user. Other industrial processing occurs such as labelling and dyeing.

(ii) The building use proposed for the Project does NOT conform to the definition of a "Commercial Development" as set out in the DC By-law since it is not one of the listed uses in paragraph (a) of the definition of Commercial Development. The building will in no way be used for "retail purposes including.....articles or things for sale or rental directly to the public..." as provided for in paragraph (b) of the said definition. There are absolutely no sales at retail of any product or service to the public and no transactions of any sort will be occurring in the premises of a nature contemplated by paragraph (a) or (b) of the definition of "Commercial Development". Moreover, there will be no delivery to the general public from the facility.

(iii) While "laundries" is a listed purpose in paragraph (b) of the definition of "Commercial Development", it needs to be read in the context of the paragraph it resides in, such that the retail purpose is "for sale or rental directly to the public". The word "laundries" is intended to mean public-facing laundromats or similar operations serving the public, not industrial laundering facilities. UniFirst processed a Minor Zoning Variance for this Project to make this distinction of its use within its Light Industrial zoning designation.

(iv) Pursuant to the definition in the DC By-law of "Industrial Development", paragraph (b): (a) UniFirst will receive raw materials and semi-processed goods (garments, mats, etc. manufactured by UniFirst and others) to the Property and process (wash, dye, label, etc.) and package these materials and goods to provide to industry (not the general public); and (b) UniFirst will also store and distribute such goods and materials which includes "operation of a truck terminal, warehouse". Again, this does not include retail sale of goods to the public.

(v) UniFirst is classified as an "Industrial Launderer" under NAICS Code 812332 and SIC Code 7218. These are industrial classifications, not commercial.

(vi) The Property is zoned for "Industrial" uses not retail/commercial uses and the Building Occupancy classification of Group F, Division 2 is "Medium Hazard Industrial Occupancies" (per Building Code §9.10.2).

(vii) With no retail activity by way of sale or rental to the public intended to take place at the Property, it is discriminatory and prejudicial to impose, for the purposes of development charges payable under the DC-Law, a classification of "Commercial Development" in respect of the Project which will have the effect of increasing the applicable development charges by \$544,671, being the difference between the rate applicable to "Industrial Development" of \$1,352,366 and the rate applicable to "Commercial Development" of \$1,897,037.

Conclusion:

In light of the grounds cited above and such further grounds that may be asserted on the hearing of the complaint before the City of London's Corporate Services Committee, City Council or on a further appeal, we respectfully submit that: (i) the amount of the Development Charge for the Project was incorrectly determined; and/or (ii) there was an error in the application of the DC By-law as set out in Section 20 of the Development Charges Act, 1997 and Section 27(1) and 27(2) in the DC By-law. The proposed use for an industrial laundering facility, not offering for sale or

rental directly to the public, is not properly characterized as a Commercial Development but more appropriately, should be classified as an Industrial Development for the purposes of calculating the applicable development charge under the DC By-law.

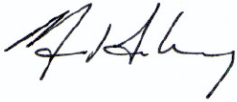
In order to continue with the Project and not cause any further delays, our client requires to urgently procure its building permit. Accordingly, it is contemporaneously paying under protest the amount of \$1,897,037 identified in its Customer Invoice in respect of Development Charges for the Project as it is of the view the applicable development charge amount should be \$1,352,366, being the development charge applicable to "Industrial Development". In dispute under this Notice of Complaint and being protested is the payment of the amount of \$544,671 under the Customer Invoice, which amount Unifirst requests be refunded as part of the determination of its complaint, together with interest as contemplated by Section 25 of the Development Charges Act, 1997.

In accordance with Section 20 of the Development Charges Act, 1997 and Section 30 of the DC By-law, we request that the City and/or its Corporate Services Committee hold a hearing into the within complaint, provide Unifirst (and the undersigned) notice of the hearing and an opportunity to make representations.

Please provide UniFirst and the undersigned with notice of any future proceedings in connection with this complaint.

Yours truly,

FASKEN MARTINEAU DuMOULIN LLP

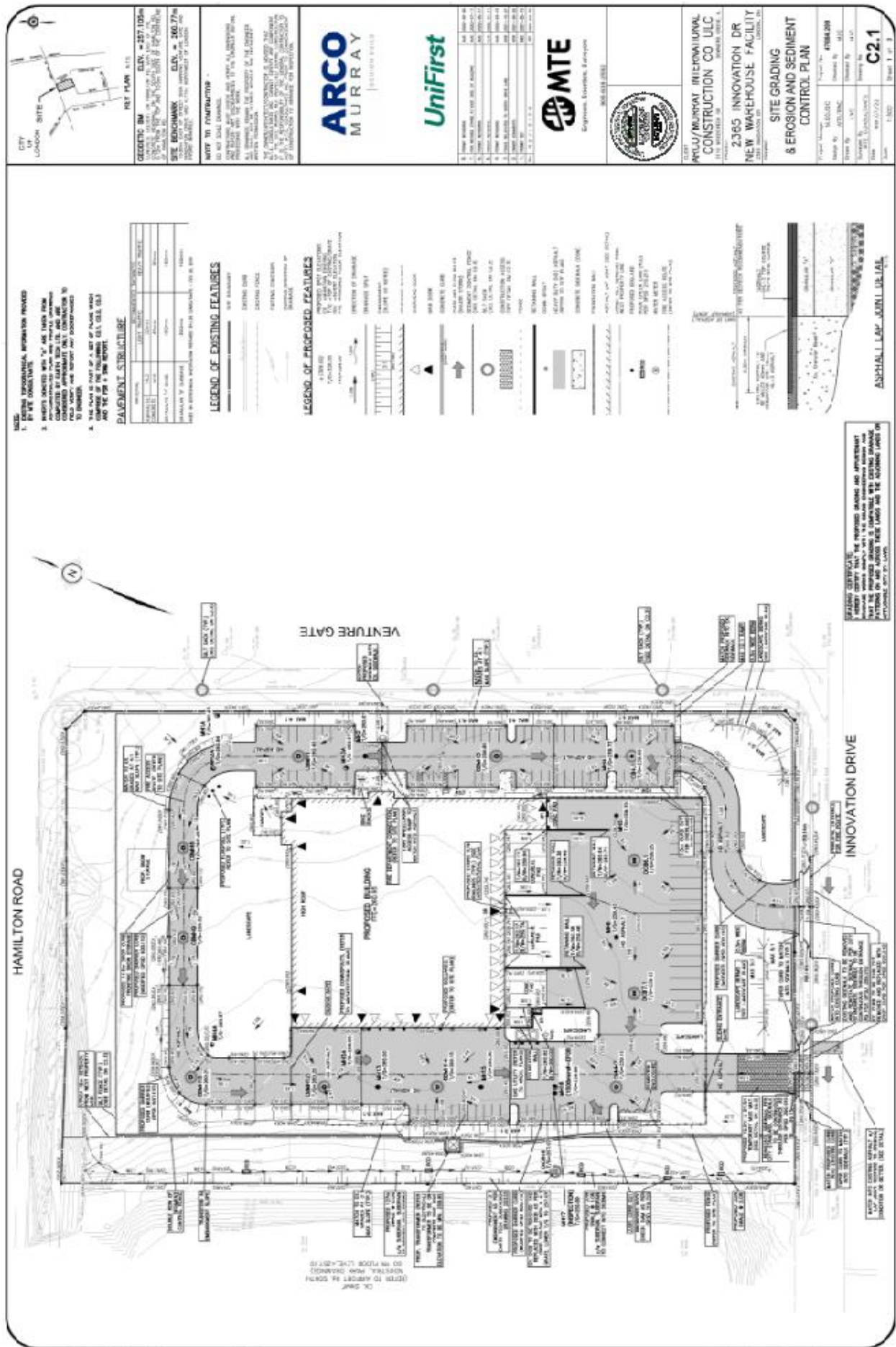


Neil M. Smiley

NMS/kh

cc. Peter Kokkoros, Director, Building and Chief Building Official Building Division, Planning and Economic Development, City of London – pkokkoro@london.ca
Rick Montgomery, UniFirst Corporation – Rick_Montgomery@unifirst.com
Will Shaffer, EEC Environmental – WShaffer@eecenvironmental.com

APPENDIX 'B'



UniFirst Canada Ltd. Development Charges Appeal

2365 Innovation Drive, London

November 28, 2022

Presented by: Neil M. Smiley, Fasken, Counsel for UniFirst Canada Ltd.

“Commercial Development” is a building used for:

Exhibit '4'

a) Office or administrative uses, including the practice of a profession, or the carrying on of a business or occupation or where most of the activities in the building provide support functions to an enterprise in the nature of trade, and for greater certainty shall include, but not be limited to, the office of a physician, lawyer, dentist, architect, engineer, accountant, real estate or insurance agency, veterinarian, surveyor, appraiser, contractor, builder, land Owner, employment agency, security broker, mortgage company, medical clinic; or

b) **Retail purposes** including activities of offering foods, wares, merchandise, substances, articles or things for **sale or rental directly to the public** and includes offices and storage within the same building, which support, are in connection with, related or ancillary to such uses, or activities providing entertainment and recreation. Retail purposes shall include but not be limited to: conventional restaurants; fast food restaurants; night clubs, concert halls, theatres, cinemas, movie houses, and other entertainment related businesses; automotive fuel stations with or without service facilities; special automotive shops/vehicle repairs/collision services/car or truck washes; vehicle dealerships; commercial truck service establishments, regional shopping centres; community shopping centres; neighbourhood shopping centres, including more than two stores attached and under one ownership; department/discount stores; banks and similar financial institutions, including credit unions (excluding freestanding bank kiosks), money handling and cheque cashing facilities; warehouse clubs or retail warehouses; food stores, pharmacies, clothing stores, furniture stores, department stores, sporting goods stores, appliance stores, garden centres (but not a garden centre defined as exempt under section 35 of this By-law), government owned retail facilities, private daycare, private schools, private lodging and retirement homes, private recreational facilities, sports clubs, golf courses, skiing facilities, race tracks, gambling operations, funeral homes, motels, hotels, restaurants, theatres, facilities for motion picture, audio and video production and distribution, sound recording services, passenger stations and depots, dry cleaning establishments, laundries, establishments for commercial self-service uses, automotive recycling/wrecking yards, kennels; *[Emphasis added]*

“Industrial Development” is a building used for:

Exhibit '4'

a) manufacturing, producing, fabricating, assembling, compounding or processing of raw materials, goods, component parts or ingredients where the physical condition of such materials, goods, parts or components is altered to produce a finished or semi-finished tangible product, or the packaging, crating, bottling, of semi-processed goods or materials, but not including any of these activities where they primarily serve retail purposes to the general public;

b) storing or distributing something derived from the activities mentioned in a) above and for greater certainty, shall include the operation of a truck terminal, warehouse or depot and does not include self-storage warehousing for use by the general public or retail sales associated with the goods stored or distributed, or accessory storage of a Commercial Development; [...] [*Emphasis added*]

*from [Development Charges By-law - C.P.-1551-227](#)

What UniFirst Does and Why it Should be Classified as an “Industrial Development”♦:

- *Hygienic laundering and finishing
- Regularly scheduled uniform deliveries and product replenishment
- Inspection of all work clothing for rips, flaws, missing buttons, etc.
- Automatic garment repairs
- Automatic replacement of overly worn or damaged garments
- Dyeing and labelling/adding logo to product

* Hygienically clean processing includes textiles laundered and finished with appropriate "green" detergents and high temperatures to a point where biological contaminants (bioburden) have been removed to an acceptable level so they can be used without fear or risk of being a source of contamination.

Source: UniFirst Canada Ltd. [website](#)

♦ 2022 CanLII 73904 (ON LT); 2019 CarswellOnt 19974

City of London – Commercial vs. Industrial Development Charges (DC) Rates

Exhibit '4'

	Service Component:	Commercial (per sq. m. of gross floor area)	Industrial (per sq. m. of gross floor area)
City Services	Fire	\$ 0.58	\$ 0.06
	Police	\$ 3.69	\$ 0.35
	Library	\$ -	\$ -
	Parks & Recreation	\$ 0.25	\$ 0.11
	Transit	\$ 1.51	\$ 0.27
	Waste Diversion	\$ -	\$ -
	Roads & Related Services	\$ 190.66	\$ 83.47
	Wastewater	\$ 29.93	\$ 49.96
	Stormwater	\$ 75.93	\$ 74.21
	Water Distribution	\$ 20.35	\$ 21.76
Total Rate	TOTAL RATE - City Services and Urban Works (applied within the Urban Growth Area)	\$ 322.90	\$ 230.19
DC CHARGE *for 5,875 sq. m.		\$1,897,037.50 COMMERCIAL - PAID UNDER PROTEST	\$1,352,366.25 INDUSTRIAL - ALLOW PAYMENT REFUND OF: \$544,671.25

* Source: Extracted from City of London's Development Charges By-law - C.P.-1551-22 (2022) (Subject to rounding)

SIC Code 7218 - Industrial Launderers

Description

Hierarchy

Industry Examples

Companies

Extend

Industry Sector
ServicesTotal Companies
312Est. Employment
12,021

Use Data For:

- ✓ Direct Mailing
- ✓ Calling
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Includes Free Sample & Industry Report

BUY BUSINESS LIST
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Description

Establishments primarily engaged in supplying laundered or drycleaned industrial work uniforms and related work clothing, such as protective apparel (flame and heat resistant) and clean room apparel; laundered mats and rugs; dust control items, such as treated mops, rugs, mats, dust tool covers, and cloths; laundered wiping towels; and other selected items to industrial, commercial, and government users. These items may belong to the industrial launderer and be supplied to users on a rental basis, or they may be the customers' own goods. Establishments included in this industry may or may not operate their own laundry or drycleaning facilities.

Snapshot

SIC Code 7218 - Industrial Launderers is a final level code of the "Services" Division. There are 312 companies classified in this industry in the USA with an estimated employment of 12,021 people.


[NAICS/SIC SEARCH](#)
[DATA ENRICHMENT](#)
[BUSINESS LISTS](#)
[MARKET SIZING](#)
[COMPANY LOOKUP](#)


NAICS CODE DESCRIPTION

[Return to Lookup Tools](#)



812332 - Industrial Launderers

Top Businesses by Annual Sales for 812332 – Click for Complete Profiles:

Unifirst Corporation	Cintas Corporation No 3
Aramark Unf & Career AP LLC	Showa Best Glove Inc
Gea North America Inc	Image Frst Hlthcare Ldry Spcls
Mission Linen Supply	Hospital Central Svcs Coop Inc
Prudential Overall Supply	Van Dyne-Crotty Co

This U.S. industry comprises establishments primarily engaged in supplying, on a rental or contract basis, laundered industrial work uniforms and related work clothing, such as protective apparel (flame and heat resistant) and clean room apparel; dust control items, such as treated mops, rugs, mats, dust tool covers, cloths, and shop or wiping towels.

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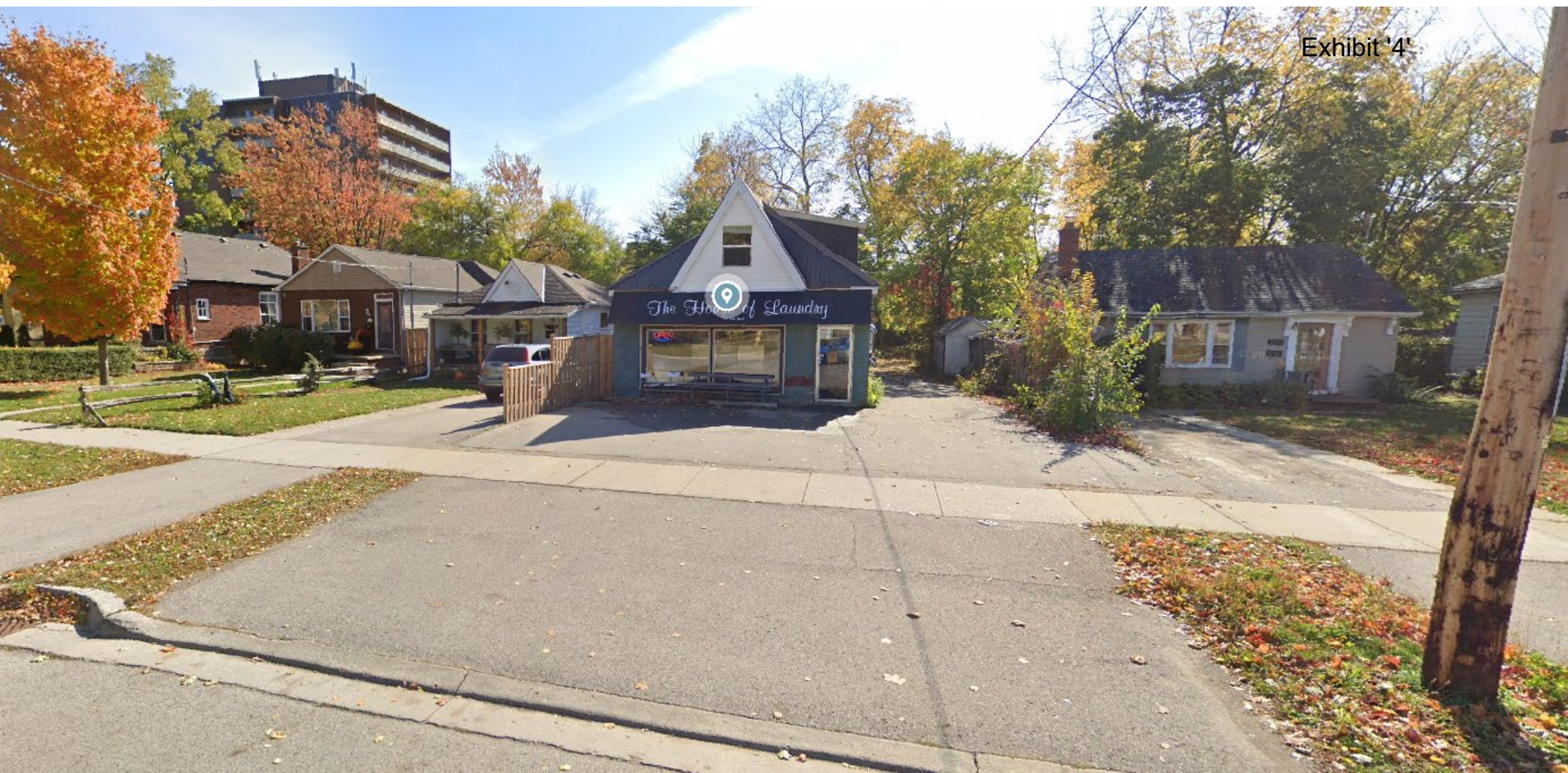
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[Data Append API](#)

NAICS Resources

[High Risk NAICS Codes](#)
[NAICS & SIC Search](#)
[NAICS & SIC Crosswalk](#)
[NAICS Code List](#)
[SIC Code List](#)
[NAICS Lookup Help](#)
[Frequently Asked Q's](#)
[History of NAICS & SIC](#)



Belmont Coin Laundry, 99 Belmont Dr., London (Google Maps)



The House of Laundry, 507 Pall Mall St., London (Google Maps)



PJ's Launderette, 41 Adelaide St. N. Unit 51, London (Google Maps)

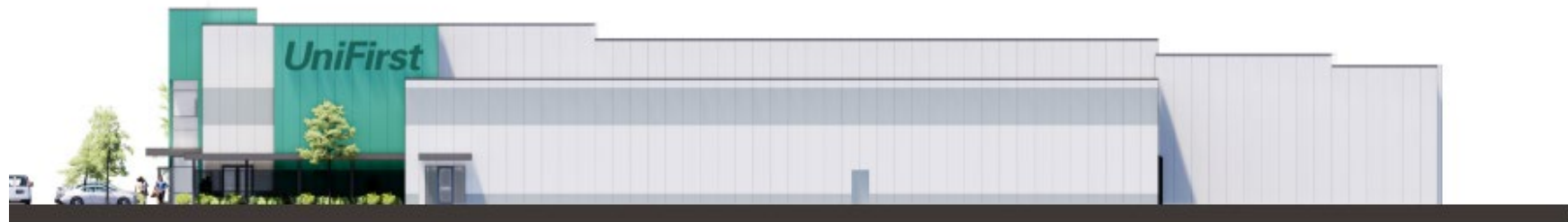




EXTERIOR ELEVATION NORTH



EXTERIOR ELEVATION EAST



EXTERIOR ELEVATION WEST







UniFirst

200 Terence Matthews Crescent, Kanata Location (Google Maps)



UniFirst

2290 Dunwin Drive, Mississauga Location (Google Maps)

