

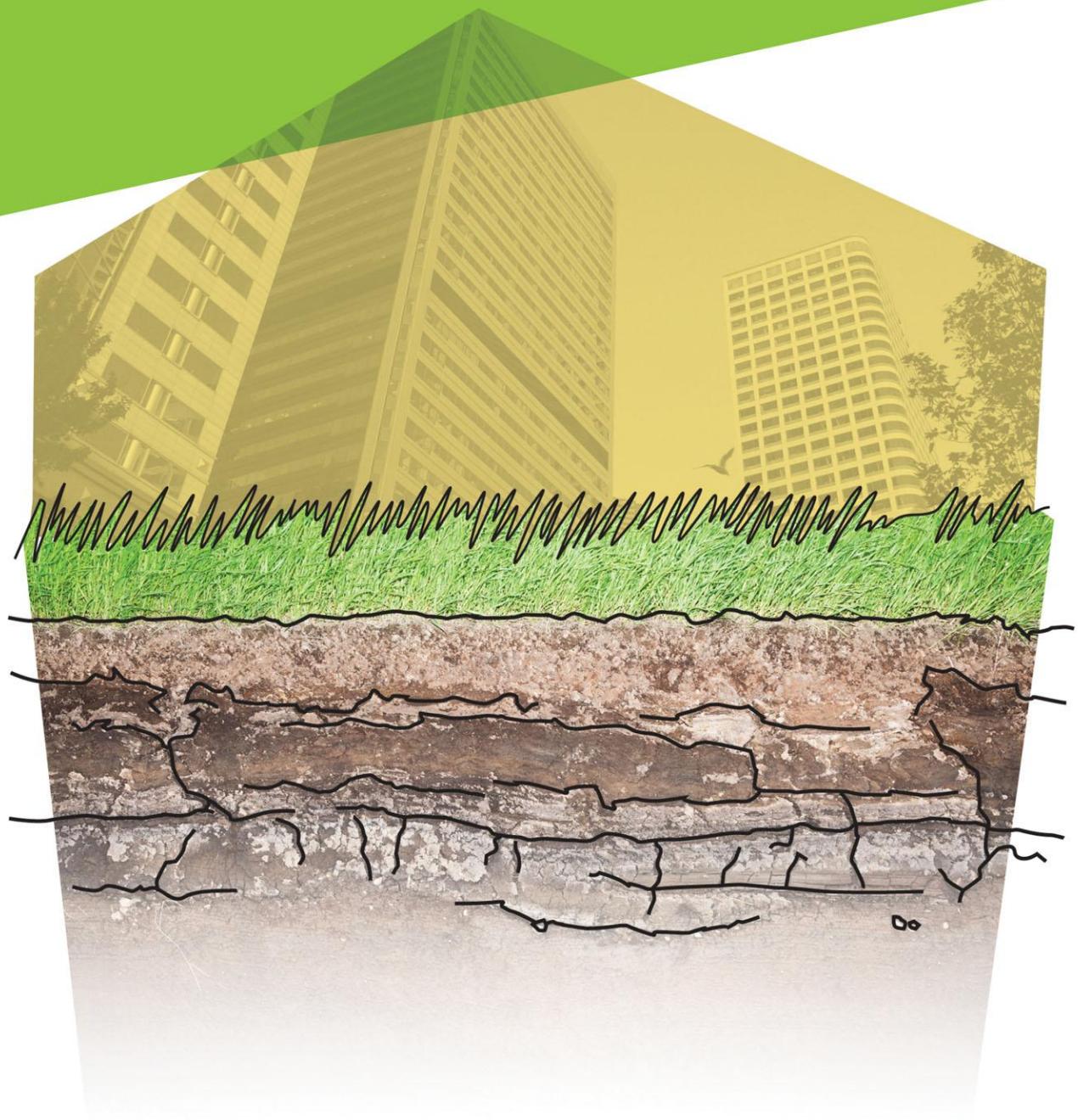


FEDERATION
OF CANADIAN
MUNICIPALITIES

FÉDÉRATION
CANADIENNE DES
MUNICIPALITÉS

GREEN MUNICIPAL FUND

Ontario Brownfield Roadmap 2014



INTRODUCTION

The Federation of Canadian Municipalities' (FCM) Green Municipal Fund™ (GMF) has produced this series of Brownfield Roadmaps to help municipalities and their private-sector partners better understand how to redevelop brownfields in their communities. The roadmaps provide a high-level overview of the brownfield redevelopment process in each province and territory, and link each process step to relevant legislative requirements and potential sources of funding.

Developed in close consultation with provincial and territorial governments, each roadmap features an easy-to-follow path through:

- The generic brownfield redevelopment process — a description of the steps that are typically followed when redeveloping a brownfield site in Canada
- Provincial requirements — an overview of provincial legislation and policy requirements associated with each step in the process
- Funding and incentive programs — a list of relevant resources, such as GMF, that are available to support municipalities and their partners as they undertake brownfield redevelopment.

The roadmaps feature a flowchart that summarizes the main activities and milestones, illustrate where the steps are connected, and link to further details in the document.

Visit [Revitalize Your Brownfields](#) for additional tools, guidance and resources related to brownfield redevelopment.

The information presented is current to the publication date and may not capture all relevant programs. Please contact the responsible organizations to verify up-to-date information.

NOTE: This document summarizes current provincial legislation and must not be regarded as a formal legal interpretation. Please refer to the identified legislation for complete details on legislative requirements, and seek legal advice if necessary.

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This publication is available on the FCM Green Municipal Fund website at www.fcm.ca/gmf under "Resources."

Federation of Canadian Municipalities
24 Clarence Street
Ottawa, Ontario K1N 5P3

Tel.: 877-997-9926

www.fcm.ca/gmf

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Generic Brownfield Redevelopment Process

- Conduct community-wide brownfield planning and engagement activities
- Standardize and streamline approval processes for redevelopment proposals
- Consider interim land use planning
- Compile inventory of brownfield sites; track and showcase redevelopment progress

- Develop sustainable remediation/redevelopment plan
- Complete Environmental Site Assessments
- Complete risk assessment (if required)
- Determine remedial objective
- Conduct remediation/risk management studies/optimization
- Develop remedial/risk management action plan that includes sustainable approaches where possible

- Complete building demolition and recycle soil and waste where possible
- Remediate site or implement risk management strategies using sustainable approaches where possible
- Receive confirmation of compliance/contaminated site closure

- Perform ongoing risk management and monitoring as required
- Design and construct site infrastructure

Provincial Requirements

- Consider developing a Community Improvement Plan for the area that includes the site (per *Planning Act*)
- Identify contaminated sites in the community as per Public Sector Accounting Board standard PS 3260
- Refer to the Environmental Site Registry to review Records of Site Condition for sites within the municipality (established by the *Environmental Protection Act (EPA)*)

- Complete Phase I Environmental Site Assessment (as per *Ontario Regulation (O.Reg. 153/040)*)
- If required, conduct a Phase II Environmental Site Assessment (ESA) (as per *O.Reg. 153/04*)
- As part of the Phase II ESA, compare contaminant levels with generic standards (as per EPA)
- Determine whether Tier 1 generic standards should be used or, if based on a risk assessment, Tier 2 or Tier 3 site-specific standards should be developed (as per *EPA, O.Rea. 153/04* and standards)

- Remediate Site as per remedial action plan and manage excess soil
- Receive Certificate of Property Use issued by province, if required, for sites undergoing risk management activities (as per *O.Reg. 153/04, EPA*)
- Submit Record of Site Condition (as per EPA)

- Perform ongoing site management and monitoring if required
- Meet local government permitting requirements

Funding and Incentive Programs

Green Municipal Fund (GMF) grants are available for sustainable neighbourhood action plans or a community brownfield action plans (50 per cent of eligible costs, grant maximum of \$175,000)
 Other programs:
Planning Act Municipal Financial Incentives

GMF grants are available for feasibility studies and field tests (50 per cent of eligible costs, grant maximum of \$175,000)
 Other programs:
Planning Act Municipal Financial Incentives
 Sustainable Development Technology Canada offers innovative technology development funding (soil and water treatment, technology development and demonstration)

GMF loans are available for brownfield capital projects (up to 80 per cent of eligible costs)
 Other programs:
Planning Act Municipal Financial Incentives
 Brownfield Financial Tax Incentive Program

GMF loans and grants are available for capital projects in the energy, transportation, waste, and water sectors (up to 80 per cent of eligible costs)
 Other programs:
Planning Act Municipal Financial Incentives
 Also, consider obtaining private funding from financial institutions, developers

Generic Brownfield Redevelopment Process

This section outlines the steps that are typically undertaken in planning, assessing, remediating and redeveloping brownfield sites. Not all of the steps may be required for every project. Some steps are suggested best practices and some steps can be performed concurrently. The process is described using universal site remediation terminology.



Plan

Community-wide brownfield planning activities

This step includes planning activities associated with brownfield redevelopment, such as sustainable community plans, community improvement plans (CIPs), neighbourhood plans, brownfield redevelopment strategies, and stakeholder and community engagement. **Parties typically involved:** municipal planning department, planning consultants.

Standardize and streamline approval processes for brownfield redevelopment proposals

Municipalities should standardize and streamline approval processes to ensure that brownfield redevelopment proposals are treated in an efficient, consistent and timely manner. Long approval processes can have a significant impact on a project's bottom line and jeopardize its financial viability. The streamlining process should include consultations with stakeholders, such as the public and developers. **Parties typically involved:** municipal planning department, consultants.

Interim land use planning

Municipalities may consider undertaking interim land uses for sites that cannot be redeveloped immediately — for financial or other reasons. In this case, rather than leaving sites vacant, temporary or interim uses (such as parking lots, community gardens, or temporary commercial/industrial uses) could be more economically and socially beneficial to the community. However, the interim land use should not increase risks to human health and the environment, nor should it impede future

redevelopment to a desirable end use. **Parties typically involved:** municipal planning department, planning consultants.

Identification and inventories of brownfield sites

In some provinces and territories, information related to brownfields or contaminated sites is compiled into databases or site registries. These inventories may be made available to the public. Municipalities can reference this information to identify contaminated sites and create a municipal brownfield inventory. Municipalities can also use this information to showcase progress on brownfield redevelopment in their community.

Municipalities should also note that the standard on [Liability for Contaminated Sites, Section PS 3260](#), contained in the [Public Sector Accounting Handbook](#) of Chartered Professional Accountants Canada, comes into effect for fiscal periods commencing on or after April 1, 2014. Section PS 3260 contains standards for municipalities on how to account for and report a liability associated with the remediation of contaminated sites for which they are responsible. Specifically, it establishes when to recognize and how to measure a liability for remediation. To properly estimate and track the associated liabilities, municipalities may need to develop an inventory of contaminated or potentially contaminated sites. Careful consideration should be given to the scope of Section PS 3260. A liability generally results from contamination at sites that are no longer in productive use or contamination arising from an unexpected event, such as a natural disaster. The standard does not apply to liabilities associated with retiring long-lived tangible capital assets in productive use (e.g. operation of a solid waste landfill site). For more information, contact [CPA Canada](#). **Parties typically involved:** municipal treasury, property, planning, and engineering and works departments, auditors and provincial officials.



Study

Sustainable remediation and redevelopment

Sustainable remediation considers the full picture when making decisions about brownfield remediation and redevelopment projects. It ensures that all aspects of the project — from assessment to redevelopment — are managed in a way that optimizes and balances environmental, social and economic benefits. A range of remediation and risk management techniques may be considered, such as administrative controls (e.g. zoning and land use restrictions); physical barriers or ground covers (e.g. asphalt); in-situ techniques, which are applied in the ground or in water; and ex-situ techniques, which involve excavating contaminated soil or pumping out groundwater.

Environmental site assessments

Known or suspected contaminated sites must be assessed to determine the type, concentration, location and extent of contamination. This information is gathered by using specific contaminated site assessment approaches, usually performed in phases and with more detailed information collected in each phase. The phases are typically defined as follows:

- **Phase I Environmental Site Assessment:** a preliminary assessment to characterize a site by evaluating current and historical land uses or activities, potential areas of contamination, and surrounding land uses or activities.
- **Phase II Environmental Site Assessment:** a preliminary assessment during which field samples are analyzed to determine contaminant types and concentrations.
- **Detailed or Delineation Environmental Site Assessment:** in some cases, a more detailed assessment is performed to confirm contaminant types and concentrations, and to delineate contaminated areas.

Following the site assessment, the generic provincial remedial objectives (i.e. the concentrations of contaminants allowed in the soil or groundwater based on the

specific land use) should be reviewed to determine the feasibility of meeting these objectives. In some provinces, remedial objectives are called remedial or remediation standards or criteria. **Parties typically involved:** municipal engineers and planners, environmental consultants.

Risk assessment

If, based on the site assessment results, it is not feasible to meet the generic provincial remedial objectives, there is an option in most provinces to perform a detailed risk assessment to develop site-specific or risk-based remediation objectives. The risk assessment must demonstrate that the site-specific objectives will protect both the environment and human health to the same extent as the generic objectives, if those objectives could have been met. **Parties typically involved:** municipal engineers and planners, environmental consultants, risk assessors.

Remedial objective determination

The final remedial objectives for the site are determined in this step. These could be either generic remedial objectives set by the province or territory, or the equally protective site-specific or risk-based remedial objectives. **Parties typically involved:** municipal engineers and planners, environmental consultants.

Remediation/risk management feasibility studies/optimization

In this step, remediation or risk management options for the site are evaluated. This could entail a study evaluating the feasibility of various options, based on available literature or based on past experience. It could also include an in-depth bench- or field-scale analysis to support the selection of a specific technology or method, or to optimize the operating parameters for a specific technology or method. **Parties typically involved:** municipal engineers and planners, environmental consultants, remediation contractors.

Remedial/risk management action planning

Based on the review of the remediation and risk management options applicable to and viable for the site, the final options are selected and a remedial action plan is developed to outline how these options will be implemented. Where possible, this plan should include the use of [sustainable approaches](#). **Parties typically involved:** municipal engineers and planners, environmental consultants, remediation contractors.



Remediate

Building demolition and soil and waste recycling

This step involves building and infrastructure demolition and soil and waste removal (e.g., utilities, roads, above-ground or underground storage tanks). Where possible, soil and waste should be recycled on-site or reused for other purposes. **Parties typically involved:** municipal engineers and planners, environmental consultants, remediation contractors, waste management contractors.

Remediation/risk management implementation

In this step, the site remediation, risk management actions, or both, are carried out as described in the remedial action plan. Where possible, [sustainable remediation or risk management approaches](#) should be used. These activities are performed until the contamination is removed, altered, contained or destroyed to meet the provincial remedial objectives or the site-specific, risk-based objectives. **Parties typically involved:** municipal engineers and planners, environmental consultants, remediation contractors.

Confirmation of compliance/contaminated site closure

This step results in official verification that the site has met the established remediation or risk management objectives. The regulatory documentation required at this stage typically states:

- whether the site meets the regulatory requirements
- whether ongoing monitoring is required
- whether continued risk management is required

At this stage, typically, the results of the remediation or risk management actions and the next steps for redevelopment are communicated to stakeholders and the community. **Parties typically involved:** municipal engineers and planners, environmental consultants, provincial officials.



Redevelop

Ongoing risk management and monitoring

Once remediation is complete or risk management activities have been implemented, long-term monitoring or risk management may be required, depending on the restrictions placed on the site. This could involve periodic sampling of soil or groundwater, or other restrictions placed on the site (e.g., limitations on excavation or on land use, or access controls). **Parties typically involved:** municipal engineers and planners, environmental and planning consultants, developers, construction contractors.

Design and construction of infrastructure

This step involves redevelopment activities, including the design and construction of infrastructure on the site. **Parties typically involved:** municipal engineers and planners, environmental and planning consultants, developers, construction contractors.

Provincial Requirements

This section outlines the key pieces of Ontario's brownfields legislation and policy positions related to each generic step.

Key legislation and sources of information¹

[Planning Act, R.S.O. 1990, Chapter P.13](#). Section 28 of the *Planning Act* outlines the requirements for the development of Community Improvement Plans (CIPs).

[Environmental Protection Act, R.S.O. 1990, Chapter E.19](#). Part XV.1 of the *Environmental Protection Act*, Record of Site Condition, deals with the management of brownfield sites and contains sections related to:

- Environmental Site Registry (s. 168.3)
- Records of Site Condition (s. 168.4 & s. 168.7)
- Director's Response to Risk Assessment (s. 168.5)
- Certificate of Property Use (s. 168.6)

[Records of Site Condition – Ontario Regulation 153/04](#). Under the *Environmental Protection Act*, the main regulation related to brownfield sites is the *Records of Site Condition Regulation* (O.Reg 153/04).

Other documents related to contaminated site legislation in Ontario are available online at the Ontario Ministry of the Environment, [Brownfields](#).

[A Practical Guide to Brownfield Redevelopment in Ontario](#), published by the Ministry of Municipal Affairs and Housing, offers additional information on brownfields legislation.

¹ NOTE: This document summarizes current provincial legislation and must not be regarded as a formal legal interpretation. Please refer to the identified legislation for complete details on legislative requirements, and seek legal advice if necessary.



Plan

Community Improvement Plan

Section 28 of the *Planning Act* outlines the requirements for the development of CIPs, which allow municipalities to set out the municipal policy framework and incentives for the rehabilitation of brownfield sites. For more information:

- [Planning Act](#)
- [A Practical Guide to Brownfield Redevelopment in Ontario](#)
- [Municipal Financial Incentives for Brownfield Redevelopment](#)

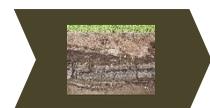
Identify contaminated sites within the community

As a result of the [Standard on Liability for Contaminated Sites, Section PS 3260](#), municipalities may need to develop an inventory of contaminated or potentially contaminated sites in order to estimate and track the liabilities associated with them. In developing the inventory, careful consideration should be given to the scope of Section PS 3260. Guidance and additional information on the application of PS3260 in Ontario can be found on the [Municipal Financial Officers' Association of Ontario website](#).

Understanding the extent of contaminated or potentially contaminated land within their community will also help municipalities to plan for brownfield redevelopment. Section 168 of the *Environmental Protection Act* and the *Records of Site Condition Regulation* contain provisions related to the [Environmental Site Registry](#), Records of Site Condition and Certificates of Property Use. When planning for brownfield redevelopment, municipalities should consult the Registry and review existing Records of Site Condition and associated Certificates of Property Use for information on properties in their communities.

For more information:

- [Environmental Protection Act](#)
- [Records of Site Condition Regulation](#) (O.Reg 153/04)
- [Ministry of Environment guidance documents](#)



Study

Phase I Environmental Site Assessment

A preliminary brownfield site characterization should be performed by completing a Phase I Environmental Site Assessment (ESA) as per Section 168.4 of the *Environmental Protection Act* and Part VII and Schedule D of the *Records of Site Condition Regulation*. This assessment is required should the property owner or responsible party wish to submit a Record of Site Condition for filing with the Province (see below) and must be completed by a Qualified Person as defined in Section 5 of the Regulation. The Ontario MOE Guide for Completing Phase One Environmental Site Assessments under Ontario Regulation 153/04 provides practical guidance for the completion of a Phase I ESA and describes and comments on certain environmental site assessment requirements in Ontario.

For more information:

- [Environmental Protection Act](#)
- [Records of Site Condition Regulation](#) (O.Reg 153/04)
- [Guide for Completing Phase One Environmental Site Assessments under Ontario Regulation 153/04](#)

Phase II Environmental Site Assessment

If required, a Phase II ESA should be completed to further characterize a brownfield site and delineate the contamination as per Part VIII and Schedule E of the *Records of Site Condition Regulation*. This assessment is required should the property owner or responsible party wish to submit a Record of Site Condition for filing with the Province (see below) and must be completed by a Qualified Person as defined by Section 5 of the Regulation. The Ontario MOE Guide for Completing Phase Two

Environmental Site Assessments under Ontario Regulation 153/04 provides practical guidance for completing a Phase II ESA and describes and comments on certain environmental site assessment requirements in Ontario.

For more information:

- [Environmental Protection Act](#)
- [Records of Site Condition Regulation \(O.Reg 153/04\)](#)
- [Guide for Completing Phase Two Environmental Site Assessments under Ontario Regulation 153/04](#)

Remedial standards determination/Risk assessment

Based on the site assessment results, the contaminant concentrations should be compared to the generic Ontario soil, groundwater and sediment standards that have been established under the *Environmental Protection Act* for various site conditions and land uses. This evaluation will help determine whether Tier 1 generic standards should be used as the remedial objectives for the site, or whether Tier 2 (use of the Modified Generic Risk Assessment (MGRA) model that is posted on the Ministry of the Environment's website to generate site-specific standards) or Tier 3 site-specific standards should be developed, based on a risk assessment performed as per Section 168.5 of the *Environmental Protection Act* and Part IX of the *Records of Site Condition Regulation*. This risk assessment must be performed by a Qualified Person as defined by Section 6 of the Regulation.

For more information:

- [Soil, Ground Water and Sediment Standards for Use under Part XV.1 of the Environmental Protection Act](#)
- [Environmental Protection Act](#)
- [Records of Site Condition Regulation](#) (O.Reg 153/04)
- [Ministry of Environment](#) guidance documents (for the *Environmental Protection Act*, the *Records of Site Condition Regulation* and Remedial Standards including Tier 2 and Tier 3 guidance and a MGRA spreadsheet to assist in developing Tier 2 site-specific standards).



Redevelop

Remediate site per remedial action plan and manage excess soil

Perform remediation or risk management activities per the remedial action plan. As part of these activities, look for opportunities to reuse or recycle excavated soil as outlined in the Ontario Ministry of Environment guideline [Management of Excess Soil – A Guide for Best Management Practices](#).

Record of Site Condition

Once the planned remediation, risk management activities or both have been undertaken, confirmatory sampling is performed to determine whether the applicable site condition standards or property-specific standards specified in a risk assessment for the site have been met. This information will be used to develop a Record of Site Condition by a Qualified Person, as defined by Section 5 of the *Records of Site Condition Regulation*. The record is submitted to the Province for filing on the Environmental Site Registry.

For more information:

- [Environmental Protection Act](#)
- [Records of Site Condition Regulation](#) (O.Reg 153/04)
- [Ministry of Environment](#) guidance documents

Certificate of Property Use

If the site is being managed under a risk assessment accepted by the Province, the Province may issue a Certificate of Property Use, Section 50 and 51 of the *Records of Site Condition Regulation*, stipulating land use and/or building restrictions or other actions that the property owner must undertake.

For more information:

- [Environmental Protection Act](#)
- [Records of Site Condition Regulation](#) (O.Reg 153/04)
- [Ministry of Environment](#) guidance documents



Remediate

Ongoing site management and monitoring

If required through a Certificate of Property Use, ongoing risk management, monitoring activities or both must be performed.

Meeting local government building permitting requirements

Please refer to local municipal building and other permitting requirements.

Funding and Incentive Programs

This section details funding and incentive programs shown in the flowchart on page 1:

- FCM's Green Municipal Fund™ (GMF) brownfield funding opportunities
- Federal programs that fund some aspect of brownfield redevelopment
- Ontario provincial programs that fund some aspect of brownfield redevelopment



Plan

GMF grants for plans

Through GMF, FCM provides grants for plans, including community brownfield action plans (e.g. community brownfield strategies, community improvement plans or revitalization plans). FCM will provide up to 50 per cent of eligible project costs to a maximum of \$175,000. In most cases, GMF funding can be combined with federal and provincial funding.

Status: Currently accepting applications.

Contact:

Federation of Canadian Municipalities

Green Municipal Fund

1-877-997-9926 • gmf@fcm.ca

For more information: [FCM's Green Municipal Fund](#)

Planning Act – Municipal Financial Incentives

Under Section 28 of the Planning Act, through the development of a CIP, municipalities can provide financial incentives in the form of grants, loans or tax assistance to support remediation and redevelopment activities within the CIP area. For example, municipalities can provide Tax Increment Grants to property owners who undertake brownfield remediation projects with the intention of repaying the funding through subsequent municipal tax increases once the property is redeveloped. The municipal portion of property taxes may also be matched, if the Minister of Finance approves, on a proportional basis with the education portion under the provincial Brownfields Financial Tax Incentive Program.

Status: Ongoing

Contact:

Ontario Municipal Affairs and Housing

Brownfieldsontario@ontario.ca

For more information:

- [Planning Act](#)
- [A Practical Guide to Brownfield Redevelopment in Ontario](#)
- [Municipal Financial Incentives for Brownfield Redevelopment](#)



Study

GMF grants for feasibility studies and field tests

Through GMF, FCM provides grants for feasibility studies (including Phase II environmental site assessments and remedial action planning) and field tests for remediation techniques. FCM will provide up to 50 per cent of eligible project costs to a maximum of \$175,000. In most cases, GMF funding can be combined with federal and provincial funding.

Status: Currently accepting applications.

Contact:

Federation of Canadian Municipalities

Green Municipal Fund

1-877-997-9926 • gmf@fcm.ca

For more information: [FCM's Green Municipal Fund](#)

Sustainable Development Technology Canada — Innovative Technology Development Funding

Sustainable Development Technology Canada (SDTC) is a federally funded, not-for-profit foundation. SDTC finances and supports the development and demonstration of clean technologies that provide solutions to issues of climate change, clean air, water quality and soil, and deliver economic, environmental and health benefits to Canadians. On average, SDTC funds 33–50 per cent of eligible project costs.

Status: Currently accepting applications.

Contact:

Sustainable Development Technology Canada
Screening and Evaluations Manager
613-234-6313

For more information: [Sustainable Development Technology Canada](#)

Planning Act – Municipal Financial Incentives

Municipalities can provide Tax Increment Grants to property owners who undertake brownfield remediation work (including site assessment and remedial planning work) with the intention of repaying the funding through subsequent municipal tax increases once the property is redeveloped.

Status: Ongoing

Contact:

Ontario Municipal Affairs and Housing
Brownfieldsonario@ontario.ca

For more information:

[Planning Act](#)

[A Practical Guide to Brownfield Redevelopment in Ontario
Municipal Financial Incentives for Brownfield Redevelopment](#)



Remediate

GMF loans for brownfield capital projects

Through GMF, FCM provides loans for remediation and risk management activities at a brownfield site. Up to 80 per cent of eligible project costs are covered. In most cases, GMF funding can be combined with federal and provincial funding.

Status: Currently accepting applications.

Contact:

Federation of Canadian Municipalities
Green Municipal Fund
1-877-997-9926 • gmf@fcm.ca

For more information: [FCM's Green Municipal Fund — brownfields capital projects](#)

Planning Act – Municipal financial incentives

Under the Act, municipalities can provide Tax Increment Equivalent Grants to property owners who undertake brownfield remediation work (including remediation and risk management activities) with the intention to repay the funding through subsequent municipal tax increases once the property is redeveloped.

Status: Ongoing

Contact:

Ontario Municipal Affairs and Housing
Brownfieldsonario@ontario.ca

For more information:

[Planning Act](#)

[A Practical Guide to Brownfield Redevelopment in Ontario
Municipal Financial Incentives for Brownfield Redevelopment](#)



Redevelop

GMF loans and grants for redevelopment capital projects

Through GMF, FCM provides loans and grants for redevelopment activities related to energy, water, waste and transportation. Funding is provided for up to 80 per cent of eligible project costs. The loan maximum is \$10 million, and the grant amount is set at up to 20 per cent of the loan to a maximum of \$1 million. In most cases, GMF funding can be combined with federal and provincial funding.

Status: Currently accepting applications.

Contact:

Federation of Canadian Municipalities

Green Municipal Fund

1-877-997-9926 • gmf@fcm.ca

For more information: [FCM's Green Municipal Fund](#)

Planning Act – Municipal financial incentives

Municipalities can provide Tax Increment Grants to property owners who undertake brownfield remediation work (including redevelopment work) with the intention to repay the funding through subsequent municipal tax increases once the property is redeveloped.

Status: Ongoing

Contact:

Ontario Municipal Affairs and Housing

Brownfieldsontario@ontario.ca

For more information:

[Planning Act](#)

[A Practical Guide to Brownfield Redevelopment in Ontario](#)

[Municipal Financial Incentives for Brownfield Redevelopment](#)

Infrastructure Ontario's Loan Program

Infrastructure Ontario's Loan Program provides long-term financing to eligible public sector clients (including municipalities) to help renew infrastructure. With respect to the redevelopment of brownfield sites, the types of projects eligible for loans include facility and infrastructure construction and renovation and energy efficiency projects.

Status: Ongoing

Contact:

Infrastructure Ontario

General Inquiry: 416-212-7289

Information Hotline: 1-800-230-0937

Email: loans@infrastructureontario.ca

For more information: [Infrastructure Ontario, Loans](#)

Private funding from financial institutions, developers

Municipalities should also seek information on private funding sources to assist with brownfield redevelopment activities.