

May 17, 2025

Minister Vic Fedeli  
Ministry of Economic Development, Job Creation and Trade  
18th Floor, 777 Bay Street  
Toronto, ON  
M7A 1S5

Dear Minister Fedeli

***Re: Feedback on Special Economic Zones Act, 2025 (ERO 025-0391)***

On behalf of the Ontario Professional Planners Institute (OPPI), we are pleased to provide feedback on the Ministry of Economic Development, Job Creation and Trade's request for comments on the creation of Special Economic Zones as part of ERO 025-0391.

OPPI is the recognized voice of Ontario's planning profession. With over 5,000 members, it serves as both the Professional Institute and regulator of Registered Professional Planners (RPP) in the province. Our members work across the planning spectrum, for consulting firms, provincial and municipal approval bodies, private developers, community agencies and academic institutions. They work across a geographically diverse cross-section of Ontario – from small towns to big cities, from northern Ontario to the Greater Toronto Area.

**While OPPI supports the government's commitment to speeding up the development of major infrastructure and natural resource projects, we are concerned that exempting proponents from existing laws and regulations may have the unintended consequence of slowing the development of infrastructure and resource projects.** We are also concerned that these changes will compromise the Planning Act and the Provincial Planning Statement, both of which are integral components of the planning process.

Public consultation, the constitutional duty to consult with Indigenous Nations, archeological assessments and environmental assessments are important aspects of the planning process that help to understand the public and ecological impact, while ensuring the successful completion of development projects. Such steps allow planners to understand the local context for planned developments and ensure that developments are compatible with their surroundings. The OPPI is concerned that this Act creates the risk that such broad powers could be used to circumvent necessary assessment activities and is counter to principles outlined in the Planning Act and the Provincial Planning Statement. If this were to happen, it could create a two-tiered planning system, which can lead to issues with public buy-in, consensus, and inequities.



**Upfront assessments and consultations are not red tape, but a crucial step in ensuring business and community confidence.** They help to ensure there are no unintended consequences that cause costly challenges or delays. These processes also work to ensure that Indigenous rights and perspectives are understood and respected, and that projects do not unintentionally impact important ecological zones, such as prime agricultural farmlands.

Stalled resource projects across Canada demonstrate that when the public and Indigenous Nations do not support development projects, they are less likely to advance in a timely manner and can be subject to further delays such as court challenges. This risk is well known to developers and investors alike, and a lack of public and Indigenous consultation decreases business confidence in important projects. If investors do not have certainty that local communities will support their development, this will decrease investment appetite.

We are also concerned that there is a lack of clarity and certainty with multiple terms outlined in the Act, which creates the risk that the Act will be misinterpreted once it is passed.

OPPI supports the Act's focus on faster permitting and creating a one-window access to government services. To help the government with improving the Act to achieve its economic goals, OPPI respectfully recommends the following amendments:

- Special Economic Zones should only be established and used for urgent economic development projects.
- Special Economic Zones should not allow any decision-maker to bypass the province's constitutional duty to consult with Indigenous Nations.
- Rather than allowing Special Economic Zones to bypass important requirements or regulations, the province should focus its efforts on expediting the planning process in a manner that safeguards the integrity of the environmental assessment process.
- Clearer definitions and a comprehensive set of criteria for designating Special Economic Zones should be included in the Act to increase clarity and certainty, as opposed to outlining those details in regulation. This criterion should include the requirement for proponents to develop a justification report that addresses the potential environmental losses with an explanation as to why normal requirements and timelines cannot be met, alongside which mitigation activities will be executed in the process.

As the regulator for Registered Professional Planners in Ontario, we would be pleased to meet with you to refine the items mentioned above so that the proposed Legislation can proceed to meet your stated intent.

Thank you for the opportunity to provide feedback as the Ministry of Economic Development, Job Creation and Trade considers the *Special Economic Zones Act, 2025*. If you have any questions or would like to setup a meeting to further discuss our submission, please contact OPPI's Executive Director Susan Wiggins at (647) 326-2328 or by email at [s.wiggins@ontarioplanners.ca](mailto:s.wiggins@ontarioplanners.ca).

Sincerely,



Claire Basinski, MCIP, RPP, CP3  
Chair



Susan Wiggins, CAE, Hon IDC  
Executive Director

c.c. Heather Potter, Chief of Staff  
Nuri Kim, Director of Policy