

November 16, 2025

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

Re: OPPI Feedback on ERO 025-1077: Consultation on Proposed Special Economic Zones Criteria

On behalf of the Ontario Professional Planners Institute (OPPI), we are pleased to provide input on the Ministry of Economic Development, Job Creation and Trade (MEDJCT)'s consultation on proposed Special Economic Zones (SEZ) criteria, intended to establish the framework for designating zones, projects and proponents to enable SEZs to achieve their goal of advancing important economic priorities while meeting high standards for operation, safety and the environment.

OPPI is the recognized voice of the planning profession in Ontario. With more than 5,000 members, OPPI serves as both the Professional Institute and regulator of Registered Professional Planners (RPP) in the province. Our members work across the planning spectrum for developers, consulting firms, municipal governments and within the Ontario Public Services, other community agencies, and academic institutions. They work across a geographically diverse cross-section of Ontario in communities of all size, in areas including environmental, policy, economic development, and much more.

OPPI is supportive of the government's overarching goal to attract investment and strengthen economic resilience. In recognition of this important priority, OPPI offers the following considerations.

Project Criteria

- **What criteria could be considered to ensure designation is only used in the most appropriate cases?**
 - SEZ designation should be based on clear, transparent criteria aligned with Ontario's existing land use planning system. Alignment with the *Planning Act*, the *Provincial Planning Statement*, and municipal official plans would ensure zones support orderly growth and long-term sustainability. SEZs should also be consistent with provincial growth management objectives and supported by existing infrastructure capacity to ensure they are used only where they can be effectively implemented.
- **The importance of a zone or project is not always measured only in size or dollar value. How else should the impact of a zone or project be considered?**
 - Impact should also be assessed based on a project's alignment with municipal priorities, its potential to advance sustainable development, and its contribution to

local and regional planning goals. Projects that support brownfield redevelopment, optimize existing infrastructure, or meaningfully contribute to long-term community well-being may be highly valuable even without large size or cost.

- **Which should be weighted more heavily when considering benefits – the benefit to the province as a whole or the benefit to local communities? Or should they be treated as equally important?**
 - Provincial and local benefits should be treated as equally essential. SEZs may support province-wide economic resilience, but they must also respect local context, including community character, local needs, and municipal planning priorities. Ensuring compatibility with existing and planned uses provides an appropriate balance between provincial objectives and local autonomy.
- **Designating a zone, project, and proponent requires specific new regulations... What else could be considered to provide greater transparency?**
 - Transparency would be strengthened through clear designation criteria, publicly accessible rationales for decisions, and regular data reporting on SEZ outcomes. Predictable processes for exemptions or regulatory modifications, implemented without undermining existing planning frameworks, would further reinforce public and professional confidence in the SEZ system.
- **Are any criteria missing? Should any be added, removed or modified?**
 - Additional clarity is needed on how SEZs will interact with official plans, zoning, and provincial land use planning policies. Any exemptions should be clearly defined to avoid undermining established planning frameworks. Requiring planning justification reports would help ensure SEZ proposals demonstrate compatibility with local and regional planning objectives.

Proponent Criteria

- **Are any criteria missing? Should any be added, removed or modified?**
 - Proponent-related decision-making should be supported by clear, consistent criteria and subject to regular review for continued compliance. Proponents should demonstrate alignment with existing legislation and planning objectives and provide transparent documentation that supports their capacity to operate effectively within Ontario's regulatory and planning environment.

Zone Criteria


- **Are any criteria missing? Should any be added, removed or modified?**
 - Zone criteria should incorporate meaningful engagement with municipalities, the public, and local First Nations and Métis communities to ensure SEZs reflect local context and needs. Zones should also align with Ontario's growth management objectives and existing infrastructure capacity. Opportunities such

as brownfield redevelopment are especially appropriate where they support sustainable, well-planned growth.

Thank you for the opportunity to provide our feedback on ERO 025-1077. We would be delighted to meet with you to discuss our recommendations in more detail, and how these would be useful to the government in meeting their overarching objective to advance important economic priorities in the face of uncertainty, while simultaneously protecting health, safety and the environment.

If you have any questions or wish to schedule a meeting, please do not hesitate to contact us at (416)-483-1873 x2313 or by email at s.wiggins@ontarioplanners.ca.

Yours Sincerely,



Andria Leigh, MCIP, RPP, Dipl.M.M.
Chair, OPPI



Susan Wiggins, CAE, Hon. IDC
Executive Director, OPPI