

## ERO 025-1077 Consultation on Proposed Ontario SEZ Criteria 2025

Dear Ministers,

While I understand the intent to drive innovation and investment, the proposal draft regulation under the *Special Economic Zones Act, 2025* needs better alignment with Ontario's and Canada's climate and environmental commitments. Without firm guardrails, the SEZ framework risks becoming a tool that prioritizes project speed over accountability, transparency, and environmental protection.

I urge the Ministry to include explicit legal protection for the Greenbelt, Oak Ridges Moraine, and Niagara Escarpment within the SEZ regulation. Any regulation that permits SEZs to bypass or weaken these protections would contradict the *Greenbelt Statute Law Amendment Act (2023)* and undermine public trust. The SEZ framework must also uphold the constitutionally protected rights of Indigenous Peoples and respect the principles of free, prior, and informed consent under the *United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP)*.

To ensure fairness and accountability, I recommend:

- Full environmental, health, and climate impact assessments before SEZ designation.
- Cumulative impact reviews and public reporting.
- Indigenous co-governance and transparent disclosure of consultation outcomes.
- Prohibition of SEZs in sensitive ecosystems and alignment with net-zero by 2050 goals.

Ontario's economic growth must go hand-in-hand with environmental stewardship, Indigenous rights, and climate responsibility.

Sincerely,