

May 14, 2025

Ministry of Economic Development, Job Creation and Trade
College Park
777 Bay Street, 18th floor
Toronto, Ontario
M5G 2N4

Submitted via email to SpecialEconomicZones@Ontario.ca and submitted online via the Environmental Registry of Ontario.

Dear Special Economic Zones Team,

Re: ERO # 025-0391: *Special Economic Zones Act, 2025*

On behalf of the Ontario Federation of Agriculture (OFA), thank you for the opportunity to participate in the consultation process for ERO # 025-0391: *Special Economic Zones Act, 2025*. OFA's feedback is summarized as follows:

- The proposed *Special Economic Zones Act* (SEZA) should be amended to protect Ontario agriculture and rural communities and be limited in scope to natural resources and nation-building projects;
- Ontarians will be looking to the province for stability; it is important that SEZA be used as a tool that respects existing rural economies while advancing nation-building projects;
- Ontario's agricultural sector is an economic powerhouse, and it is critical that farmland preservation be a provincial priority;
- *Special economic zones* must be designated strategically to avoid negative impacts on agricultural land and systems (especially *prime agricultural areas*), SEZA should make use of the *agricultural impact assessments guidelines* to guide these protections;
- *Trusted proponents* should be removed from the Act; and
- A statutory requirement for public consultation on the designation of areas, persons, and projects under the Act should be added to SEZA.

The Ontario Federation of Agriculture is the largest general farm organization in Ontario, proudly representing more than 38,000 farm family members. OFA has a strong voice for our members and the agri-food industry on issues, legislation and regulations administered by all levels of government. We are dedicated to ensuring that the agri-food sector and rural communities are considered and consulted with for any new or changing legislation that would impact the sustainability and growth of our farm businesses.

OFA appreciates this opportunity to provide input on the consultation on ERO # 025-0391: *Special Economic Zones Act, 2025*. OFA understands the proposed *Special Economic Zones Act (2025)* would exempt "*trusted proponent[s]* or *designated project[s]* from [other] requirements," such as Ontario legislation, policy, and local regulatory by-laws and official plans. The proposed *Special*

Economic Zones Act (2025) includes broad powers. OFA requests safeguards be added to protect *agricultural systems* and areas from developments and the environmental effects thereof.

In a world of increasing uncertainty, Ontarians will be looking to the province for stability. A cornerstone of Ontario's stability is its agricultural sector. Accordingly, as a part of unleashing Ontario's economy, Ontario must act responsibly by respecting *agricultural systems*, protecting agricultural lands (especially *prime agricultural areas*), and promoting the agricultural sector's economic output. Ontario's agricultural and food sectors contribute \$50 billion to the provincial economy every year and employ 10% of the province's workforce—more than 750,000 people. Farms contribute significantly to local tax revenue while having negligible impacts on most municipal service expenses and augmenting other services, such as drainage. In short, keeping farmland in agricultural use helps:

- To deliver safe, nutritious, affordable, and reliably available food to millions of Ontarians;
- To balance municipal budgets and deliver services at affordable rates;
- To mitigate the effects of climate change by buffering weather events and absorbing carbon emissions from the atmosphere; and
- To provide exceptional quality food, fiber, fuels, and flowers to Canada and the world.

OFA understands and appreciates that this Act is intended to expedite large and intensive projects, including but not limited to the "Ring of Fire" mining project, the 401 tunnel, and oil and gas pipelines. However, as proposed, SEZA has no limits on what areas or projects may be designated. SEZA should be amended to limit its scope to critical natural resources and nation-building projects.

Ontario has lost over 2.1 million acres of farmland since 1996 in the pursuit of urbanized *settlement and employment areas*. Without the proper planning tools in place SEZA has the potential to accelerate this already unsustainable trend of farmland loss. If SEZA is used to expedite *settlement or employment area* developments, that purpose should be limited to existing urbanized areas and prioritize the efficient use of land, rather than enable urban sprawl. It is imperative that SEZA respect *minimum distance separation* between livestock facilities and residential uses (and other sensitive land uses). SEZA must also not be used to override the *right to farm* under the *Farming and Food Production Protection Act* (1998), which protects farmers from complaints about *normal farm practices*.

Ontario's farmers and rural residents deserve to have their livelihoods protected and their quality of life sustained. OFA recommends the Act be amended by prohibiting the creation of *special economic zones* that would have negative impacts on the *agricultural system*. Farmers depend on long-term certainty in order to plan not just what crops to grow, but how their farm businesses should grow for decades to come. The Ontario Ministry of Agriculture, Food and Agri-Business (OMAFRA) is in the process of creating an *agricultural impact assessments guideline* that would require the strategic placement of non-agricultural developments, and the mitigation or minimization of negative effects on the *agricultural system*. Ontario should take advantage of the work being done by OMAFRA and require *special economic zones* that affect *agricultural systems* (especially *prime agricultural areas*) to conform to an *agricultural impact assessment*.

Unleashing Ontario's economy must involve supporting Ontario farmers. OFA continues to advocate for economic development and investment opportunities that the agricultural sector can

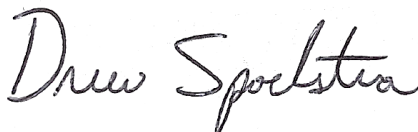
provide through an urgent need for processing and distribution plants. A significant portion of Ontario's crops and livestock products are processed in the United States, then shipped overseas or returned to Canada—something that could be more efficient if done domestically in Ontario. Our agricultural sector is waiting for the opportunity to access new markets, both domestic and international and by protecting the land that sustains us, building or expanding processing facilities and distribution facilities we can continue to Grow Ontario and be the leading economic drive that Ontario should be proud of, producing \$50 billion of agriculture-related products and services.

OFA is opposed the notion that the government should bestow *trusted* status on a person. The idea of a *trusted proponent* status goes against the concept that the government treats all residents equally before the law. The term *trusted proponent* should be removed from the SEZA framework. Ontario residents are treated equally before the law and must apply for exemptions to specific provisions or policies. In order for the public to continue trusting the legal system in Ontario, it is imperative that Ontario continue to treat all residents as equals and the statutory requirement to conduct public consultation regarding any proposed *designation* or *regulation* under the Act should be included in SEZA in order to ensure that the principles of transparency and accountability are upheld.

In closing, OFA thanks the Special Economic Zones Team for the opportunity to provide our feedback and perspectives on ERO 025-0391: *Special Economic Zones Act, 2025*. We live in unprecedented times that have underscored the importance of doing things right and supporting our fellow Canadians. Our province delivers safe, affordable, and reliably available food, fiber, fuels, and flowers for Ontario, Canada, and the world. We can continue to do this if we protect our *agricultural systems* and lands, build developments strategically, and provide Ontarians the certainty they need to invest, build, farm, and thrive.

We look forward to working with the provincial government and our municipal counterparts to ensure fair, transparent, and accountable legislative and planning systems for the benefit and protection of all Ontario's farm families, rural residents, and communities.

Sincerely,



Drew Spoelstra
President

cc: Hon. Stephen Lecce, Minister of Energy and Mines
Hon. Victor Fedeli, Chair of Cabinet and Minister of Economic Development, Job Creation and Trade
Hon. Lisa M. Thompson, Minister of Rural Affairs
Hon. Trevor Jones, Minister of Agriculture, Food and Agribusiness
Hon. Rob Flack, Minister of Municipal Affairs and Housing
OFA Board of Directors

This submission has been approved by OFA Board of Directors and will be posted to OFA's website: <https://ofa.on.ca/resources>.