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APPRO

ASSOCIATION OF
POWER PRODUCERS
OF ONTARIO

Ministry of Economic Development, Job Creation and Trade
College Park 18th Flr,
777 Bay St, Toronto, ON
M7A 1S5
Attn: SpecialEconomicZones@Ontario.ca

May 15, 2025

Via email

RE: (ERO 025-0391) *Special Economic Zones Act, 2025*

This submission is made by the Association of Power Producers of Ontario (APPRO) in response to a request for comments posted on the Environmental Registry of Ontario website on April 17, 2025, in relation to the above-referenced topic.

APPRO appreciates the opportunity to provide such feedback.

Best Regards,

A handwritten signature in blue ink, appearing to read 'Colin Anderson', written over a horizontal line.

Colin Anderson
President and CEO, APPRO

cc. APPRO Board of Directors

(ERO 025-0391) *Special Economic Zones Act, 2025*

Submission of the Association of Power Producers of Ontario (APPrO)

INTRODUCTION

APPrO represents generators operating in the province of Ontario, and a variety of organizations and individuals concerned with generation. APPrO members include developers, suppliers and consultants to power enterprises, both public and private, with an emphasis on implementing responsible and sustainable energy systems in Canada and around the world.

The Ministry of Economic Development, Job Creation and Trade is proposing a new law called the *Special Economic Zones Act, 2025*. If it gets approved, the Ontario government will be able to designate special areas that are critical to Ontario's economy and security, where selected projects could move faster as a result of simplified rules, faster approvals, and one-window access to services. This submission is in response to that request for public comments, as posted on the Environmental Registry of Ontario website.

APPrO's members are committed to a reliable, affordable and sustainable energy supply in the province of Ontario, which is why APPrO has an interest in this matter.

APPrO appreciates the opportunity to provide feedback.

DETAILED COMMENTS

The *Special Economic Zones Act, 2025* is meant to quickly advance strategically important economic activity and priority projects within designated zones. By building faster and more strategically, Ontario can protect its industries, mitigate the impact of trade disruptions, and ensure the long-term prosperity

and security of the economy. APPrO and its members believe that the proposed changes can help develop efficiencies within the existing permitting framework while maintaining the same level of oversight as the existing process.

In general, APPrO is supportive of measures that are taken to advance the ability of qualified proponents to accelerate project execution in Ontario. The provisions of this new legislation would apply to projects in the zone with reliable proponents that meet high standards for operation, safety, and the environment that can benefit from faster permitting, the streamlining of some permits and approvals, simplified requirements, and priority access to one-window services.

APPrO understands that this legislation will still require appropriate approvals and permitting to take place - it will just provide for an expedited, coordinated process and simpler administration. All required stakeholdering will still take place, including Indigenous consultation. Further, while APPrO supports such process streamlining, it maintains that the ultimate objective is more timely project completion and asset building. The streamlined process is merely a means to the end of, in APPrO's case, a more robust electricity sector.