**Comment for ERO 025-0391**

**Subject:** Opposition to Bill 5 and the Special Economic Zones Act, 2025.

**Inconsistent with Ontario’s Legal and Policy Commitments to Indigenous Peoples**

I am writing to express strong opposition to Bill 5, the *Protect Ontario by Unleashing Our Economy Act, 2025,* and the embedded *Special Economic Zones Act, 2025*. This legislation is inconsistent with Ontario’s legal obligations and alignment with commitments to Indigenous peoples, environmental stewardship, and democratic accountability.

**Legal & Policy Obligations for Indigenous Consultation in Ontario**

The Government of Ontario is bound by multiple frameworks that require meaningful consultation with Indigenous communities. This includes, but is not limited to:

* *Constitution Act, 1982 – Section 35*
	+ Recognizes and affirms existing Aboriginal and treaty rights.
	+ Establishes the duty to consult and accommodate when government decisions may affect those rights.
* *Environmental Assessment Act, R.S.O. 1990, c. E.18*
	+ Requires consultation with Indigenous communities when projects may impact their lands, rights, or interests.
	+ Applies to public and private sector undertakings that may have environmental effects.
	 Read on Ontario.ca: <https://www.ontario.ca/laws/statute/90e18>
* *Environmental Bill of Rights, 1993, S.O. 1993, c. 28*
	+ Establishes the Statement of Environmental Values (SEV), which ministries must consider when making environmentally significant decisions.

 Read on Ontario.ca: <https://www.ontario.ca/laws/statute/93e28>

* + All ministries listed on the Environmental Registry of Ontario's SEV page include commitments to Indigenous consultation, consideration, and/or incorporation of Indigenous peoples and their intentions. This demonstrates a province-wide policy framework that Bill 5 and the *Special Economic Zones Act, 2025,* directly violate or neglect.

 Read on Ontario.ca: <https://ero.ontario.ca/page/sevs>

**Specific Concerns with the Special Economic Zones Act, 2025**

The *Special Economic Zones Act, 2025,* grants Cabinet the power to exempt projects from these obligations, allowing development to proceed without full environmental assessments or Indigenous consent. This is especially concerning in regions like the Ring of Fire, where [First Nations such as Neskantaga, Marten Falls, and Webequie](https://www.cbc.ca/news/canada/toronto/ont-ring-of-fire-1.6991468) have expressed both interest and deep concern about the impacts of development on their lands, waters, and rights.

By bypassing consultation and environmental oversight, this bill perpetuates a colonial pattern of land appropriation and exclusion. It contradicts Ontario’s legal responsibilities and undermines trust with Indigenous nations. It also directly violates the province’s own stated goals of reconciliation, partnership, and inclusive economic development.

**Call to Action**

I urge the Government of Ontario to:

1. Withdraw or significantly amend Bill 5 to ensure full compliance with constitutional and environmental law.
2. Guarantee that no Special Economic Zone can be designated without the free, prior, and informed consent of affected Indigenous communities.
3. Restore robust environmental protections, including the *Endangered Species Act* *(2007)* and full environmental assessments.

Ontario’s economic goals must not come at the expense of Indigenous rights, ecological integrity, and the province’s own commitments to reconciliation.

Sincerely,

[Your Name]
[Your Location, if desired]