

**Date:** May 16, 2025

**To:** The Environmental Registry of Ontario

**Topic:** Proposed new *Special Economic Zones Act, 2025* (ERO number 25-0391)

## **Position Statement**

I urgently request that the Government of Ontario not enact the Bill 5 Schedule, *Special Economic Zones Act, 2025*.

## **Discussion:**

While all ten of the Bill 5 schedules are concerning, I am particularly concerned about the environmental implications of the *Special Economic Zones Act, 2025*. This legislation would enable the province to make regulations delineating zones in which “trusted proponents” or designated projects may not have to comply with existing legal requirements enacted by the Ontario Legislature (and by-laws made by municipalities) and as such, is a direct assault on the rule of law.

I believe—fear—that such discretionary dispensations or exemptions from protective legislation could result in the creation of contentious “zones in which environmental features, functions, and values will not be protected.

The apparent rationale for these and other changes in Bill 5 is that Ontario’s environmental laws must be amended in order to facilitate economic development and mitigate current tariff battles. To my knowledge, these claims are not credible and have not been substantiated by the Ontario government.

The “jobs vs the environment” argument behind this approach is not substantiated. At this point in human history, facing the existential crisis of climate change, good government must be based on environment and economy.

In its 2019 newsletter, *Why a Healthy Plants and a Healthy Economy Go Hand-in-Hand*, the *World Economic Forum* stated, “It is not ‘saving the planet’ that will kill growth. Rather, the accelerating destruction of nature will undermine not only the global economy, but it could eventually threaten many life-forms on earth, including our own species.” It laid out three pathways for action:

- 1) Developing more holistic indicators that better account for economic growth along with broader metrics of human and environmental well-being.
- 2) Incentivizing all actors in the economy to change current innovation pathways and mainstream the necessary environmental transitions for their core business models.
- 3) Wise leadership that can both chart a new vision for living in harmony with nature and inspire shared commitment in achieving it.

As a concerned citizen, I urge the Government of Ontario to not enact Bill 5, *Special Economic Zones Act, 2025* but rather address the need for more housing and improved

infrastructure through ways that protect the environment and natural systems, elements that will provide a strong foundation for our economy, now and into the future.