



Ministry of Economic Development, Job Creation and Trade  
Email: [SpecialEconomicZones@Ontario.ca](mailto:SpecialEconomicZones@Ontario.ca)

**RE: ERO Number 025-0391 – Proposed Special Economic Zones Act, 2025**

The Township of Puslinch Council at its meeting held on May 7, 2025, directed Township staff to submit comments with respect to the proposed Special Economic Zones Act, 2025. While the Township understands the Province's interest in streamlining economic development particularly in addressing broader geopolitical and supply chain concerns, we have serious reservations about the implications of this proposed legislation, especially at the municipal level and respectfully submits the following concerns and objections to the proposed act:

**Lack of Criteria for Designation and Proponent Selection**

The legislation fails to clearly define:

- What constitutes a “special economic project”;
- What criteria will be used to designate projects or proponents as eligible; and
- How a “trusted proponent” will be determined.

The Township stresses the importance of having transparent, evidence-based criteria for designating projects and proponents. Any project designated under this Act must be backed by sound, current data and technical reports, and proponents must undergo a thorough background review demonstrating no recent environmental or regulatory infractions. Puslinch Council cannot support legislation that could empower back actors to undertake development within the Township through a vague or permissive framework.

**Disregard for Municipal Planning Authority**

The proposed Act grossly overlooks and undermines the established role of municipalities in land use planning. Municipalities are not simply stakeholders but are the frontline authorities in determining the suitability and sustainability of development within their jurisdictions. Any process that bypasses municipal by-laws, Official Plans, or public consultation with local councils and communities is unacceptable and deeply undemocratic.



### **Failure to Address Existing Oversight Shortcomings**

Before assuming additional oversight powers through the creation of Special Economic Zones, the Province must address the serious concerns raised by the Auditor General in:

The 2023 report on the aggregate industry, which cited lack of enforcement, inspections and various oversight gaps; and

The 2025 report on the safety of non-municipal drinking water systems, which mirrored similar governance failures.

These reports clearly demonstrate that the Province is already struggling to manage the responsibilities it currently holds. Expanding exclusive jurisdiction under this new Act, especially in ways that override municipal control, without first addressing these systemic weaknesses is irresponsible.

### **Single Aggregate Sites Must Not Qualify**

We are also concerned about the potential for single aggregate pits or similar operations to be declared “special economic projects.” Clear language must be included in the legislation to explicitly exclude these types of operations from qualifying.

Aggregates may be a component of economic development, but an individual pit does not constitute a project of provincial strategic importance and must remain subject to local planning controls.

### **Opposition to Inclusion in Economic Zones**

Finally, the Township of Puslinch does not support being identified as part of a Special Economic Zone under this legislation. The Township opposes any process that imposes provincial designations on municipalities without direct consultation, agreement, and evidence of local benefit.

In summary, while the Township acknowledges the Province’s intent to bolster economic resilience, this must not come at the expense of local governance, environmental stewardship, and public trust. The Township urges the Province to withdraw this proposal or, at a minimum, undertake meaningful consultation with municipalities, conservation authorities, and the public before proceeding.

Sincerely,



Justine Brotherston,  
Interim Municipal Clerk  
Township of Puslinch