



May 17, 2025

Via Email: specialeconomiczones@ontario.ca

Re: Conservation Ontario's comments on the "Special Economic Zones Act, 2025" (ERO#025-0391)

Bill 5, the *Protect Ontario by Unleashing our Economy Act, 2025* proposes to amend existing and enact new legislation, including the *Special Economic Zones Act, 2025*. Upon proclamation, the *Special Economic Zones Act* will provide regulation-making authorities to the Lieutenant Governor in Council (LGIC) and applicable Minister to make criteria for and to designate "special economic zones", "trusted proponents", and "designated projects".

Once established, designated projects undertaken by trusted proponents in special economic zones may receive exemptions or modifications to specified legislative or regulatory permitting, approvals, or other similar requirements. The proposed legislation may apply in any area of Ontario, and to any provincial Act, regulation or instrument, including municipal by-laws.

Conservation Ontario and the 36 Conservation Authorities (CAs) share the government's commitment to identify process improvements and provide timely approvals to support development priorities. We are committed to supporting a strong provincial economy, safe housing and critical infrastructure development, and safeguarding sources of municipal drinking water. CAs are dedicated to providing client service excellence for all development proponents.

Providing strong protections for people and property from risks related to natural hazards and existing and future sources of municipal drinking water are essential to support economic development and safe and prosperous communities. Conservation Ontario recommends that natural hazard permitting requirements under the *Conservation Authorities Act* and policies set out in the source protection plan under the *Clean Water Act* continue to apply in any designated special economic zones. The continued application of these regulations and policies will balance potential risks and further support safe and healthy communities.

Ontario's natural hazard regulatory framework is essential to protect housing, critical infrastructure, and the public from natural hazard impacts, including flooding and erosion. The success of Ontario's hazard management framework and the Conservation Authority

model is recognized for minimizing flood hazard risks to housing compared to other provinces, resulting in considerably lower insurable losses. This coordinated and hazard/risk-based framework is strongly supported by Ontario's Special Advisor on Flooding in their report "*An Independent Review of the 2019 Flood Events in Ontario*".

Conservation Authorities play a critical role in the protection of sources of municipal drinking water as Source Protection Authorities (SPAs) under the *Clean Water Act*. Lead SPAs are responsible for developing, updating and assisting in the coordination and implementation of the source protection plan(s) to protect existing and future sources of drinking water. All Source Protection Plans are approved by the Minister of Environment, Conservation and Parks.

The *Clean Water Act* appropriately establishes a high standard for the protection of drinking water quality and quantity and requires that in case of conflict between a provision of that Act and another Act or regulation, that the provision that provides the greatest protection to the quality and quantity of the water prevails. Maintaining this requirement under the *Clean Water Act* is necessary to ensure the strongest available legislative and regulatory protection is applied to safeguard drinking water quantity and quality. This multi-barrier approach to ensuring the safety of Ontario's drinking water was strongly supported by Commissioner O'Connor in the 2002 "*Report of the Walkerton Inquiry*".

Conservation Authority staff bring decades of specialized expertise balancing development pressures and finding local solutions to complex matters. Both Conservation Ontario and Ontario's 36 CAs welcome opportunities to strategically collaborate with provincial and municipal governments to ensure provincial development priorities are planned and implemented safely, supporting long-term economic prosperity and a healthy environment.

Thank you for the opportunity to review and provide comments on the "Special Economic Zones Act, 2025" (ERO#025-0391). We would be pleased to further discuss these comments at your convenience.

Sincerely,

Dave Barton

Dave Barton
Chair, Conservation Ontario

Angela Coleman

Angela Coleman
Chief Administrative Officer / General
Manager, Conservation Ontario

c.c. All CA CAOs/GMs