

Ontario BIA Association
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Monday October 20, 2025

The Honourable Victor Fedeli
Minister of Economic Development, Job Creation and Trade
Ministry of Economic Development, Job Creation and Trade
777 Bay Street, 21st Floor
Toronto, ON M7A 1S5

Re: Ontario's Draft Criteria for Special Economic Zones (ERO 025-1077)

Dear Minister Fedeli,

On behalf of the Ontario Business Improvement Area Association (OBIAA), we would like to commend the Government of Ontario for its continued efforts to strengthen Ontario's economic competitiveness and investment climate through initiatives such as the proposed Special Economic Zones (SEZs). The intent to accelerate job creation, attract strategic industries, and streamline key projects demonstrates a strong commitment to building Ontario's prosperity.

As the provincial association representing over 300 Business Improvement Areas (BIAs) across Ontario, supporting tens of thousands of small businesses located on main streets in communities of all sizes, we respectfully submit the following considerations to ensure that the SEZ framework strengthens rather than inadvertently harms Ontario's local economies.

Protecting and Empowering Small Businesses

While OBIAA recognizes the value of enabling strategic investment, we encourage the Province to ensure that SEZ designations:

- **Do not displace or disadvantage small businesses** within or adjacent to proposed SEZ boundaries. Large projects and regulatory exemptions can unintentionally drive-up commercial rents, increase land speculation, and place pressure on existing small enterprises.
- **Maintain local planning input**, ensuring that municipal bylaws and community design guidelines; particularly those protecting heritage, accessibility, and pedestrian-friendly main streets; remain respected wherever possible.
- **Incorporate local supply-chain participation requirements**, encouraging designated proponents to procure goods and services from Ontario-based small businesses and local contractors.

- **Include community-benefit commitments** that specifically reference small business inclusion, workforce development, and main street revitalization as measurable outcomes.

Collaboration and Awareness

OBIAA and Ontario's BIAs are uniquely positioned to help the Province raise awareness among local business communities about SEZ opportunities and to support engagement between municipalities, small businesses, and "trusted proponents." BIAs have deep, established networks in every region of Ontario and are trusted conveners at the local level.

We therefore respectfully request that OBIAA and BIAs be included in provincial consultations, working groups, or stakeholder discussions related to the SEZ designation process, particularly in communities where proposed zones may intersect with existing commercial districts or main streets. Early inclusion will ensure that SEZs achieve balanced economic outcomes that benefit both large investors and the small business ecosystem that underpins Ontario's economy.

We would welcome the opportunity to meet with your team to share insights from Ontario's 300+ BIAs and explore how SEZ implementation can align with local economic-development goals.

Thank you for your leadership in advancing Ontario's prosperity and for considering the vital role that small businesses and BIAs play in building vibrant, resilient communities.

Sincerely,



Rachel Braithwaite

Executive Director

Ontario Business Improvement Area Association (OBIAA)

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cc.

- Ministry of Municipal Affairs and Housing
- Ministry of Small Business Services