

November 16, 2025

Attention: Ontario Ministry of Economic Development, Job Creation and Trade

RE: Proposed Special Economic Zones Criteria

The Hamilton-Oshawa Port Authority (HOPA Ports) is grateful for the opportunity to provide comments on the provinces proposed criteria for designating Special Economic Zones (SEZs) under the *Special Economic Zones Act, 2025*.

HOPA Ports is a self-sustaining integrated port network that manages port and marine assets across 1,400 acres in Ontario in Hamilton, Niagara and Oshawa. In 2024 alone, our port network handled approximately 10.7 million MT of cargo worth \$4.5 billion, making up 31% of all cargo that moves through the Great Lakes – St. Lawrence Seaway System and connecting to over 40,000 jobs.

As a major operator of a multimodal-industrial employment lands in Ontario, we would like to offer the province the following recommendations for consideration.

Recognition of Marine Port Lands and Dock Facilities as Special Economic Zones

HOPA recommends that the province recognizes all Ontario Marine Ports and dock facilities as SEZs. This includes land owned and controlled by Port Authorities, Municipalities, and private operators.

Marine assets are vital trade and manufacturing-enabling infrastructure that directly benefit local industries and the supply chain more broadly. These lands are the basis of industrial activities that support Ontario's key sectors. Marine lands are supported by multimodal transportation, including marine, rail, and truck. This optionality enables the most efficient movement of goods depending on origin, destination, and industry needs.

The Great Lakes–Seaway System is a critical economic engine for Ontario, connecting local suppliers to domestic and international markets. As hubs for manufacturing, logistics, and distribution, the industries that operate along the Seaway are vital for enabling key economic activity and job creation. The recognition of Marine Port Lands and Dock Facilities as SEZs would champion them as the strategically critical locations that they are.

Enabling Access and Egress of Land

Access points must be at the forefront of planning for SEZs. Industrial activity relies on the uninterrupted movement of raw materials to continue operations, including the construction of facilities. When these access points are weak, challenges can emerge that will interrupt the flow of goods. Roads that are not designated to handle industrial traffic can become overwhelmed, congesting traffic, disrupting the movement of goods, and impacting adjacent communities.

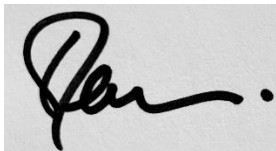
Other Considerations for SEZs

To better reflect industry needs, we would also recommend the following considerations for the province to pursue in establishing SEZs:

- Protecting SEZs and adjacent strategic land against residential encroachment
- Mapping of “buffer zones” to minimize conflict between industrial and residential areas
- Implementing design solutions to minimize conflict in use

HOPA Ports would like to thank you once again for an opportunity to provide our input. We would be happy to continue discussions on this topic.

Sincerely,



Larissa Fenn
Vice President Corporate Affairs
HOPA Ports