

P.O. Box 756
Toronto, ON
M5C 2K1



APPrO
ASSOCIATION OF
POWER PRODUCERS
OF ONTARIO

Ministry of Economic Development, Job Creation and Trade
College Park 18th Flr,
777 Bay St, Toronto, ON
M7A 1S5
Attn: SpecialEconomicZones@Ontario.ca

November 13, 2025

Via email

**RE: (ERO 025-1077) Consultation on Proposed Special Economic Zones
Criteria**

This submission is made by the Association of Power Producers of Ontario (APPrO) in response to a request for comments posted on the Environmental Registry of Ontario website on October 2, 2025, in relation to the above-referenced topic.

APPrO appreciates the opportunity to provide such feedback.

Best Regards,

A handwritten signature in blue ink, appearing to read 'Colin Anderson', with a stylized flourish at the end.

Colin Anderson
President and CEO, APPrO

cc. APPrO Board of Directors

(ERO 025-1077) Consultation on Proposed Special Economic Zones Criteria
Submission of the Association of Power Producers of Ontario (APPrO)

INTRODUCTION

APPrO represents generators operating in the province of Ontario, and a variety of organizations and individuals concerned with generation. APPrO members include developers, suppliers and consultants to power enterprises, both public and private, with an emphasis on implementing responsible and sustainable energy systems in Canada and around the world.

The Ministry of Economic Development, Job Creation and Trade is seeking to consult the public on the regulatory framework under the *Special Economic Zones Act, 2025* for the criteria to designate zones, projects, and proponents. The criteria being proposed as part of this consultation must be established through an LGIC regulation. The regulation would, if made, aim to support economic development while helping to ensure safeguards are in place to protect the environment and health in a manner that is consistent with the protection of the rights of Indigenous Peoples. This submission is in response to that request for public comments, as posted on the Environmental Registry of Ontario website.

APPrO's members are committed to a reliable, affordable and sustainable energy supply in the province of Ontario, which is why APPrO has an interest in this matter.

APPrO appreciates the opportunity to provide feedback.

GENERAL COMMENTS

The *Special Economic Zones Act, 2025* is meant to quickly advance strategically important economic activity and priority projects within designated zones. By building faster and more strategically, Ontario can protect its industries, mitigate the impact of trade disruptions, and ensure the long-term prosperity and security of the economy. APPrO and its members believe that the proposed changes can help develop efficiencies within the existing permitting framework while maintaining the same level of oversight as the existing process.

In general, APPrO is supportive of measures that are taken to advance the ability of qualified proponents to accelerate project execution in Ontario. The provisions of this new legislation would apply to projects in the zone with reliable proponents that meet high standards for operation, safety, and the environment that can benefit from faster permitting, the streamlining of some permits and approvals, simplified requirements, and priority access to one-window services.

APPrO understands that this legislation will still require appropriate approvals and permitting to take place - it will just provide for an expedited, coordinated process and simpler administration. All required stakeholdering will still take place, including Indigenous consultation. Further, while APPrO supports such process streamlining, it maintains that the ultimate objective is more timely project completion and asset building. The streamlined process is merely a means to the end of, in APPrO's case, a more robust electricity sector.

COMMENTS SPECIFIC TO PROJECT, PROPONENT AND ZONE CRITERIA

Using the Supporting Materials attached to the ERO Posting, APPrO provides the following specific comments for consideration. In general, the criteria shown in each category in the supporting document entitled "*Draft Policy Intent for SEZ*

Criteria and Guiding Questions” are reasonable. The following comments relate to clarifications of those criteria, or additions to the criteria:

1. Project Criteria:

- Both the provincial and local economies should be considered when evaluating projects. Ultimately, if two projects are assessed as identical regarding the sum of their provincial and local economic benefit, and only one can be considered qualifies for SEZ inclusion, the one with the higher benefit to the province should prevail.
- Regarding “moon-shot” projects, there needs to be an assessment of both *probability of success* and *potential beneficial impact*. If the combination of both of those dimensions is sufficiently high, then the project should be included. For example, if both probability of success and potential beneficial impact are graded on a scale of 1-10, one could take the product of the two numbers (resulting in a score between 1-100) and use that as a comparator against other projects under consideration.

2. Proponent Criteria:

- As per the policy intent document, APPrO agrees with the compliance categories of Health and Safety, Environmental, Financial, Employment and Regulatory. APPrO takes no position regarding appropriate sources for evidence.
- APPrO suggests that some process needs to be included whereby companies from other jurisdictions can be designated as trusted, in addition to Canadian companies. Exclusive preference for Canadian proponents is potentially problematic from the perspective of international trade treaties. Further, notwithstanding events of the last 10 months, for decades Ontario has benefitted from foreign investment and participation in its energy sector. Completely curtailing that cannot

be good for ratepayers nor for competition generally. It would be unfortunate for a well-intentioned “elbows up” approach to be responsible for a more expensive, less reliable energy sector.

3. Zone Criteria:

- None.

As always, APPrO appreciates the opportunity to provide such feedback and looks forward to participating in the Ministry’s ongoing discussions.