



November 16, 2025

Submission to ERO: Comments on ERO - 1077, Consultation on Proposed Special Economic Zones Criteria

Gravel Watch Ontario (GWO) is a province-wide coalition of citizen groups and individuals that acts in the interests of residents and communities to protect the health, safety, quality of life of Ontarians and the natural environment in matters that relate to aggregate resources. Formed in 2003 we have over 20 years of experience assisting both communities and government agencies in matters related to aggregate.

GWO does not agree with the government that Ontarians will benefit from the creation of Special Economic Zones (SEZ) that are not subject to the province's existing regulations protecting our health and safety, and our environment. The proposed criteria for SEZ projects focus on economic benefits alone to the detriment of equally important outcomes such as environmental protections, Indigenous Rights, and labour standards. The Act should be repealed by the government, and the proposed regulation should not be passed. We are also aware of and support the submissions made by the Canadian Environmental Law Association (CELA), The Wilderness Committee, Reform Gravel Mining and Legal Advocates for Nature's Defense.

We outline our detailed comments below:

1. Designation of SEZs

The government has broad power to select SEZs without considering input from the public, municipalities, or Indigenous communities. The Minister makes the decision. The proposed regulatory standards do not provide a clear explanation of how the government will choose SEZs or determine which "trusted proponents" can develop them.

We agree with CELA that any determination of special economic zones, trusted proponents or designated projects must consider social and cultural impacts, cumulative impacts, resource revenue sharing and/or community benefit agreements, and the international records of proponents or proposed contractors on environmental, health and safety standards, and in working with Indigenous communities. Designations should not occur in areas that are environmentally or culturally sensitive.

2. Regulations Within the SEZ Eliminated

The government would have the power to eliminate legal regulations that protect the environment and our health and safety, all in the name of economic growth. Potentially a “trusted proponent” specifically chosen by the government could ignore environment and labour laws to the detriment of the community. Any proposed SEZ designation should be judged considering our current laws. Specific regulations could be removed only after public and Indigenous feedback has been carefully considered.

3. Duty to Consult Indigenous Peoples

The proposed legislation would allow the Minister to decide the SEZ or “trusted proponent” without any requirement for Indigenous consultation despite the constitutional requirement and Indigenous call for amendment of the legislation and proposed regulation. The province has a responsibility for effective stewardship of crown lands and any proposed changes must avoid infringement of Aboriginal and Treaty Rights through meaningful consultation and respect for the United Nations Declaration of Indigenous Rights.

4. Public Consultation

There is no mandatory requirement for public notice and consultation for any decisions made under the Special Economic Zones Act or regulations. The regulation must contain this requirement. Unfortunately, this regulation gives the public no opportunity for review or deliberation yet the public bears the consequences of any negative impact that may occur within the SEZ or the surrounding areas in the long term.

If this regulation does move forward, achievement of Ontario’s growth would be at the risk and expense of our health, safety and the environment. Gravel Watch Ontario suggests it is important to accurately assess the social, economic, and environmental needs in depth with the affected communities and the Indigenous rights holders before creating SEZs.

Regards,

Gravel Watch Ontario