
November 15, 2025

Special Economic Zones Team
Ministry of Economic Development, Job Creation and Trade

Submitted online via email to SpecialEconomicZones@Ontario.ca

To the Special Economic Zones Team,

Re: [ERO # 025-1077](#), Consultation on Proposed Special Economic Zones Criteria

On behalf of the Ontario Federation of Agriculture (OFA), thank you for the opportunity to participate in the consultation process for ERO # 025-1077: Consultation on Proposed Special Economic Zones Criteria. OFA appreciates this opportunity to provide input on the consultation on the advancement of Ontario's economic activities. Our feedback is summarized as follows:

- To support transparency, the regulatory framework should include a requirement to disclose publicly what documentation is used for making designation under SEZA;
- Similarly, the MEDJCT should clarify how SEZA proposals will be initiated and processed;
- To support our province's economic security, the regulatory framework should require the use of agricultural impact assessments to protect the agri-food sector, which annually contributes more than \$51.4 billion in economic activity;
- In an abundance of caution, the inclusion of a power to issue stop-work orders might be useful in emergency situations within special economic zones; and
- The regulatory criteria may benefit from specific targets and thresholds in order to ensure consistency between MEDJCT staff and Ministers.

The Ontario Federation of Agriculture is the largest general farm organization in Ontario, proudly representing more than 38,000 farm family members. OFA has a strong voice for our members and the agri-food industry on issues, legislation and regulations administered by all levels of government. We are dedicated to ensuring that the agri-food sector and rural communities are considered and consulted with for any new or changing legislation that would impact the sustainability and growth of our farm businesses.

Ontario has many strategic sectors—autos, steel, aluminum, and critical minerals and we urge you to place agriculture and food processing alongside them. Canada's agri-food system contributes roughly \$149 billion to GDP and supports 2.3 million jobs nationwide. Within that, food and beverage manufacturing contributes \$35.8 billion in GDP and 318,400 direct jobs making it the largest manufacturing industry in Canada by both economic output and employment. Ontario leads the way with over \$51 billion contributed

to GDP. We must lean into our natural competitive advantage in primary agriculture and food processing, and keep it central to nation-building, trade-infrastructure, innovation, and procurement decisions.

The Ministry of Economic Development, Job Creation and Trade (MEDJCT) has proposed regulatory criteria for the *Special Economic Zones Act* (SEZA, 2025) to advance transparency and consistency in the designation of special economic zones, trusted proponents, and designated projects. OFA supports transparency and consistency in government decision-making. Towards these ends, the regulatory framework could be improved by including mechanisms that require the public disclosure of documents used by the Minister and Lieutenant Governor when considering a designation. By publishing what materials are used to make an informed decision, the province would promote public confidence in the Act by demonstrating how the Minister and Lieutenant Governor arrived at their opinion that designation criteria were met.

OFA has also observed that the proposed framework does not describe the intake and processing of SEZA proposals. Clarification of whether the province will use a “bid and tender” system, if private entities will be allowed to propose *special economic zones*, or if another system will be used in processing SEZA proposals, would also encourage transparency in the system.

The MEDJCT has stated that the framework will “ensure the necessary safeguards are in place to protect health, safety, and the environment.” OFA supports the use of legislative and policy safeguards and is appreciative that the MEDJCT has made these reassurances. OFA encourages the Minister to include the completion of an agricultural impact assessment (AIA) as a criterion of designated projects and special economic zones. Large projects have the potential to disrupt the agricultural system, and in part may limit the expansion of nearby farm operations, particularly if they are exempted from *minimum distance separation formulae* (MDS). The Ontario Ministry of Agriculture, Food and Agribusiness (OMAFRA) has been developing a modern guideline for AIA; this tool should be applied to special economic zones to protect Ontario’s agricultural systems from the potential effects of large projects. AIAs are required of non-agricultural developments inside prime agricultural areas and by provincial plans, such as the *Greenbelt Plan*.

Ontario protects our agricultural systems with good reason: The agri-food sector is a cornerstone of the provincial economy, contributing more than \$51.4 billion in annual economic activity, \$26.2 billion in agri-food exports, and employing 11% of Ontario’s workforce by supporting more than 867,000 jobs. SEZA was created to ensure the long-term economic prosperity, security, and competitiveness of the province, and as such should be used only to advance projects that do not negatively impact our agri-food sector.

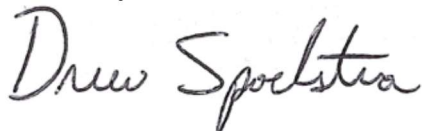
It was also observed that neither SEZA nor the proposed regulatory framework grants the Minister with the power to freeze active operations within special economic zones. In an abundance of caution, it may be advisable to grant the Minister the power to issue stop-

work orders, considering that the normal legislative framework may be altered by SEZA. There may be circumstances where Minister may wish to halt operations without revoking an enabling regulation under the Act.

Lastly, it is noted that the regulatory framework is thorough in the list of topics that the Minister and the Lieutenant Governor must consider when weighing a decision to designate projects, proponents, and zones. In this framework, the Minister and, in specific sections, the Lieutenant Governor have sole discretion whether each criterion has been met. Towards the goal of ensuring the Act is applied and interpreted consistently by MEDJCT staff and future Ministers, more specific criteria regarding what constitutes a “good record” or “significant long-term economic benefits” may be beneficial.

OFA appreciates the opportunity to provide our feedback and perspectives on the regulatory framework for the *Special Economic Zones Act (2025)*. We look forward to working with the provincial government to find policy solutions that support the agri-food sector.

Sincerely,



Drew Spoelstra
President

cc: Hon. Rob Flack, Minister of Municipal Affairs and Housing
Hon. Trevor Jones, Minister of Agriculture, Food and Agribusiness
Hon. Lisa M. Thompson, Minister of Rural Affairs
OFA Board of Directors

This submission has been approved by OFA Board of Directors and will be posted to OFA’s website: <https://ofa.on.ca/resources>.