

November 14, 2025

Hon. Victor Fedeli  
Minister of Economic Development, Job Creation and Trade  
777 Bay Street, 18<sup>th</sup> Floor  
Toronto, ON M7A 1S5

Minister Fedeli

**Re. County of Dufferin Response to the Ministry of Economic Development, Job Creation and Trade Proposed Special Economic Zones Criteria.**

On behalf of the County of Dufferin, staff is pleased to provide written comments pertaining to the proposed special economic zones criteria that were prepared by the Ministry of Economic Development, Job Creation and Trade ('MEDJCT'). It is our belief that the following comments will assist the MEDJCT in strengthening the currently proposed criteria to ensure that Ontario remains a prosperous province both in the short-and-long-term.

The County of Dufferin understands the challenging circumstances our economy is facing as a direct result of U.S. implemented tariffs, and, as such, Dufferin County wants to extend our appreciation to the Province of Ontario for taking affirmative action to assist in mitigating these challenges. In the face of these unprecedented times, Dufferin County recognizes and values the steps being taken by the Province to grow and expand the economy.

Through the County of Dufferin's review of the proposed special economic zones criteria, the following comments, questions, and suggestions are provided. Each point provided falls under one of the three categories – Designated Projects, Trusted Proponents, Special Economic Zones.

Special Economic Zones

- There are no criteria provided in this designation that speaks to Indigenous engagement and the Duty to Consult. It is recommended that criteria be added to this designation that require, at a minimum, the Duty to Consult with the appropriate Indigenous organizations.
- There are no criteria provided in this designation that discuss engaging with the respective municipal agencies, such as Counties, Region's with planning responsibilities, and local municipalities. It seems critical that prior to the identification and establishment of a special economic zone, the Province should engage with the appropriate municipal agencies to determine feasibility, constraints, and opportunities. It is suggested that specific criteria be

added that requires the Province to undertake a certain level of engagement with the appropriate municipal agencies.

- Section Two (2) speaks to activities that are *economically significant* or *strategically important* to the Ontario economy. This terminology is notably broad and, as such, it is suggested that examples of *economically significant* or *strategically important* activities be provided to assist in clarifying what those activities might be.

#### Trusted Proponents

- In section three (3), which offers a list of criteria for all entity's not described in subparagraph 1(i), it is recommended that an additional subsection be added that speaks to open engagement with the appropriate municipal agencies. While the County understands that the purpose of the *Special Economic Zones Act, 2025* is to expedite the approvals process, it is our opinion that continued engagement, outside that of municipal applications, is critical to the success of economically focused projects.
- Subsections i) and ii) of section three (3) highlight the requirement for trusted proponents, as well as associated consultants and contractors, to have good records relating to legal requirements, such as health and safety, environmental protection, and financial matters. It is our belief that transparency on those minimum standards is paramount to ensuring all projects are prepared by upstanding proponents. Based on that, the County of Dufferin recommends that a condition be added to subsections i) and ii) specifically outlining the materials to be requested by the Minister for their review and, in addition to that, the requirement for those materials to be made public and circulated to the respective municipal agencies for their review.
- Subsection iii) of section three (3) states "if the person will need to engage with Indigenous communities...". In our opinion, engagement with Indigenous communities should not be optional, and, instead, this wording should be revised in a way that mandates engagement with Indigenous communities.
- For subsection iii) of section three (3), it is recommended that a condition be added to subparagraph A) that requires the respective Indigenous community to be accepting of the proponents plan for engagement. In addition, it is also suggested that a condition be added that the appropriate Indigenous community is accepting of the previous work with Indigenous communities that has been undertaken by the proponent.



A community that grows together

Designated Projects

- In sections two (2), three (3), and four (4) there are subsections that state “such other factors as the Minister considers appropriate”. It is our belief that, at a minimum, examples of those factors that the Minister would deem appropriate should be identified. The inclusion of this clause, in our opinion, provides too broad of a scope and should be more greatly refined.
- Section three (3) centres largely around perceived benefits to communities; however, the term ‘benefits’ is rather vague. The County of Dufferin suggests that examples of expected benefits be provided, specifically under subsections i) and iii).

The County of Dufferin appreciates the opportunity to provide comments on the proposed special economic zones criteria. We also want to reiterate our appreciation to the Province of Ontario, but specifically the MEDJCT in their work advancing and growing the economy in Ontario. It is our hope that the comments provided above will assist the MEDJCT in refining the proposed criteria for special economic zones in Ontario.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'LM'.

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