

In this time of critical economy restructuring and rebuilding, it is important that the seeds of future tensions are not inadvertently sown in our haste to designate Special Economic Zones: creating dependencies on unsustainable, profit-focused, and extractive industries; investments in benefits and harms that are unequally distributed across space and time; and the consolidation of land use decision-making power, which has led to democratic backsliding around the world.

We cannot possibly create just, stable, and prosperous outcomes, without just, stable, and prosperous processes. What is justified away as a “short-term harm” or bullet to bite to counter US trade wars will inevitably be normalized until it becomes long-term reality.

Thus, the designation of Special Economic Zones must reflect a better future. A better future does not involve disproportionate burdens placed on local communities, nor does it involve increased unilateral decision making that consistently prioritizes the national over the local. A better future takes note of global challenges with Special Economic Zones – foreign investments that degrade the quality of life for locals, increased kidnapping and homicide rates of women and girls, the growth of illicit economies, reliance on wealthy, bad-faith actors – and implements guardrails against them.

### **Project Criteria**

*Guiding question: Which should be weighted more heavily when considering benefits – the benefit to the province as a whole or the benefit to local communities? Or should they be treated as equally important and essential?*

Our province is built up of local communities: no Ontarians can be left behind. A provincial benefit is a marginal one for communities that will face the main brunt of infrastructure projects. If national interests supersede the local, development will be unfair and inequalities will deepen. Already marginalized communities rarely see the economic benefits of things like mining because workers are brought in from other parts of the province (which is also correlated with increased rates of MMIWG2+), there is no plan for when the industry dies (eg. mining in Bancroft), and access to goods is limited by infrastructural problems that are not fixed by introducing new industries (eg. reducing the cost of groceries across the province does not really help northern Ontario communities whose grocery prices are primarily determined by environmental factors).

In order for Ontarians to tangibly see benefits, the local must be prioritized. This can be done through the already proposed community benefit plans, which prioritizes the creation of local jobs, and the improvement of quality of life in tangible ways, and it creates long term plans for the community.

In all, benefits to local communities should be weighted more heavily, or at the very least, attempts must be made to guarantee that the provincial benefit will be directly seen by the community through community benefit plans.

*Guiding question: Creating a new Special Economic Zone is meant to be used only for a narrow set of circumstances when it is of the utmost importance to Ontario's economy and/or security. What criteria could be considered to ensure designation is only used in the most appropriate cases?*

First, I want to affirm the importance of the impact assessments that should be considered in the creation of these zones, which has been brought up in feedback already. Ontario, and Canada as a whole, consistently prides itself on our ability to conserve social, cultural, and environmental resources. We won't know what we've lost – natural heritage that drives a lot of tourism, Ontario's and Canada's improving relationships with FNMI communities, thriving neighbourhoods – until it is all irreparably damaged.

Second, throughout the policy documents, the cost of creating special economic zones is rarely discussed. Even the most basic economics class teaches the cost-benefit analysis, and its importance in decision making! Short termism creates a wobbly foundation that will inevitably collapse. I also want to point out that in the name of security and resilience, it is critical to ensure that new dependencies and unjust systems are not created. For example, when only considering benefits for the siting of a new mine and not the cumulative impacts, you lose perspective on how local economies become solely reliant on mining companies and mines. What happens when this inevitably becomes a race to the bottom, and the sector collapses?

I want to propose the necessity for a framework that also evaluates the cost of these zones and who bears those harms. Environmental justice literature points to a framework of distributive (who is receiving benefits and facing costs), processional (who makes decisions and oversees process), and restorative/retributive (access to correct a wrong and to fair punishment) justice. These should be outlined in any proposal to establish a zone, in order to mitigate the worst costs of a streamlined impact assessment process.

### **Proponent Criteria**

*Guiding question: What should be used to determine whether compliance standards are met? Which compliance records from Ontario, Canada, or internationally should be provided as evidence? Over what time period? What other requirements should there be for proponents?* Global performance of companies – in the form of lawsuit history, international complaints (like to the International Rights of Nature Tribunal or international courts) and protests against the company around the world – should be considered. By comparison, other countries and provinces have much less strict regulations, so it becomes crucial to examine how companies behave when the rules are looser. As an example: Canadian mining companies are notorious around the world for destroying local communities by polluting water, soil, and air, thereby worsening health outcomes. They create local dependencies on the jobs they provide and become difficult to remove, even as they literally kill people. Less stringent requirements for companies like this are an invitation to wreak havoc on the province.

Second, I urge there to be explicit metrics for the quality of Indigenous engagement plans. This includes regularity in meetings and engagement, and acknowledgement of terms in treaties (Section 35). Some form of accountability for the execution of these plans should be

implemented as well – perhaps the already-proposed advisory board could play a role here. Without enforcement, this requirement is useless. Moreover, the criteria of evidence of “working successfully with Indigenous communities” must be specified, as it otherwise leaves ambiguity for what “success” means and for whom. Indigenous communities that have previously worked with the company should have to vouch for the degree to which the working relationship was successful. This will incentivize continuous good behaviour from these proponents without being overly burdensome on regulatory bodies.

*Guiding question: What, if any, special considerations should be given to whether companies from other jurisdictions can be designated as trusted?*

In line with previous comments, foreign companies should be held to a much higher standard of how long they can stay, ownership transfers after projects are completed, and their engagement with local communities. If the whole point is to create independence for Ontario and Canada from the US, as implied in the policy intent, we should not be creating new dependencies on foreign companies, and allowing them to profit off of our resources while potentially harming our people.

### **Zone Criteria**

*Guiding question: Are any criteria missing? Should any be added, removed or modified?*

I want to affirm the importance of the already-proposed advisory committees/boards, and stress the importance of democratic decision making. The value of a project to Ontario’s economy should be, at least in part, determined by the people who feel the effects of an unstable and insecure economy: the people. Consensus building and democratic processes are what make up the fabric of this country, they are valuable for the policy intent and should not be stripped away. Elected representatives should have far greater say in this process (as opposed to one or two decision makers), as should Indigenous leaders who have rights to the management of their land.