

Bill 5 “Special Economic Zones Act, 2025” (ERO#025-0391)

Purpose of Submission: Standing Committee Written Submission

Organization Name: Conservation Ontario

Presenter’s Name and Title: Angela M. Coleman,

Conservation Ontario, Chief Administrative Officer

Date: Monday May 26th, 2025

Address: 120 Bayview Parkway, Newmarket, ON, L3Y 3W3

Email Address: acoleman@conservationontario.ca

Phone Number: 289-763-4807

May 26th, 2025

Honourable Aris Babikian, MPP
Chair, Standing Committee on the Interior
Whitney Block, Room 1405
Toronto, ON
M7A 2J3

RE: Conservation Ontario Comments – Bill 5, *Protect Ontario by Unleashing our Economy Act. 2025*

Dear Chair Babikian and Honorable Members of the Standing Committee,

Verbal Presentation to Standing Committee:

My name is Angela Coleman and I am the Chief Administrative Officer of Conservation Ontario. Conservation Ontario is the member service organization for Ontario's 36 Conservation Authorities, located across the Province, on a watershed basis.

I deeply respect and acknowledge the submissions of my co-presenters, on this panel. I am honored to share this space with you and recognize the significance of your comments as rights holders while my comments are from a stakeholder perspective.

Conservation Authorities work directly with the Province, Member Municipalities, partners and communities, to protect people and property from: natural hazards [such as: flooding, erosion, and landslides]; maintain flood and erosion control infrastructure; maintain sensitive lands and Conservation Areas for public benefit; protect municipal drinking water; and offer watershed enhancement, protection, and restoration projects (including agricultural and business stewardship projects, wetland projects, grassland and tree planting projects, and land securement).

Opportunity to review Conservation Authority Individual Submissions

Many Conservation Authorities have made individual submissions on this Bill. Members, if you review these submissions, you will gain perspectives from individual Conservation Authorities: many provide more detailed comments than my time permits today – so I invite you to review those.

Government Proposal

The Ministry of Economic Development, Job Creation and Trade Environmental Registry of Ontario (ERO) posting, Bill 5, the Protect Ontario by *Unleashing our Economy Act*, 2025, proposes to amend existing and enact new legislation, including the *Special Economic Zones Act*. Upon proclamation, the *Special Economic Zones Act* will provide regulation-making authorities to the Lieutenant Governor in Council (LGIC) and applicable Minister to make criteria for and to designate “*special economic zones*”, “*trusted proponents*”, and “*designated projects*”. Specific definitions of these terms have not been provided with the proposed Bill.

Once established, *designated projects* undertaken by *trusted proponents* in *special economic zones* may receive exemptions or modifications to specified legislative or regulatory permitting, approvals, or other similar requirements. The proposed legislation may apply in any area of Ontario, and to any provincial Act, regulation or instrument, including municipal by-laws.

Conservation Ontario reviewed and received many comments and concerns on the proposed legislation; however, today, with limited time, I will focus comments directly on our specific legislative frameworks under the *Conservation Authorities Act* and *Clean Water Act*.

General Comments

1. Protecting Public Health and Safety Supports Economic Prosperity: Providing strong protections for people and property from risks related to natural hazards and existing and future sources of municipal drinking water are essential to support economic development and safe and prosperous communities. Conservation Ontario recommends that natural hazard permitting requirements under the *Conservation Authorities Act* and policies set out in the source protection plan under the *Clean Water Act* continue to apply in any designated special economic zones. The continued application of these regulations and policies will balance potential risks and further support safe and healthy communities.
2. Support for improved processes: Conservation Ontario and the 36 Conservation Authorities (CAs) share the government's commitment to identify process improvements and provide timely approvals to support development priorities. We are committed to supporting a strong provincial economy, safe housing and critical infrastructure development, and safeguarding sources of municipal drinking water. We believe that efficient permitting can be achieved while maintaining these important shared priorities.

Recommendations

1. Natural Hazards Protection: Ontario's natural hazard regulatory framework protects housing, critical infrastructure, and the public from natural hazard impacts, including flooding and erosion. The success of Ontario's hazard management framework and the Conservation Authority model is recognized for minimizing flood hazard risks to housing compared to other provinces in Canada, [even though we have the most housing starts in Ontario], resulting in considerably lower insurable losses. This coordinated, hazard, risk-

based framework is supported by Ontario’s Special Advisor on Flooding in their report “An Independent Review of the 2019 Flood Events in Ontario”.

2. Municipal Drinking Water Protection: Conservation Authorities support protecting sources of municipal drinking water as Source Protection Authorities (SPAs) under the *Clean Water Act*. Protecting drinking water sources from Ontario’s lakes, rivers, streams, and underground aquifers is critical to economic prosperity. All Source Protection Plans are approved by the Minister of Environment, Conservation and Parks.

Maintaining high protections established under the *Clean Water Act* ensure strong legislative and regulatory protections apply to safeguard drinking water quantity and quality. Ontario’s multi-barrier approach to ensuring the safety of drinking water is strongly supported by Justice O’Connor in the 2002 *Report of the Walkerton Inquiry*.

3. Applying Protection Provisions in Special Economic Zones: Given the risk to public health and safety from natural hazards and extreme weather events we recommend: the Provincial Planning Statement natural hazard policies; *Conservation Authorities Act* permitting requirements; and source protection plans under the *Clean Water Act* apply in any potential *Special Economic Zone*.
4. Technical Expertise and Experience: Conservation Authority staff bring decades of specialized expertise balancing development pressures and finding local solutions to complex matters. Both Conservation Ontario and Ontario’s 36 Conservation Authorities welcome opportunities to ensure provincial development priorities are planned and implemented safely, supporting long-term economic prosperity and a healthy environment.

Thank you for the opportunity to review and provide comments on the “Special Economic Zones Act, 2025” (ERO#025-0391). I am pleased to respond to any questions you have at this time.

Sincerely,

Angela M. Coleman,

Chief Administrative Officer, Conservation Ontario