



**CHRISTIAN FARMERS
FEDERATION OF ONTARIO**
ACCREDITED FARM ORGANIZATION

May 16, 2025

Attention: Special Economic Zones
Ministry of Economic Development, Job Creation and Trade
College Park, 18th Floor
777 Bay St.
Toronto, ON
M7A 1S5

RE: ERO 025-0391 Special Economic Zones Act, 2025.

Dear Ministry,

The Christian Farmers Federation of Ontario (CFFO) is an Accredited Farm Organization representing the interests of over 4,000 farm families in Ontario who are called to the vocation of farming. CFFO policy promotes economically, socially, and environmentally sustainable farming, advocating that farmers receive fair return for their production and stewardship efforts.

The CFFO is concerned about the proposals in the *Special Economic Zones Act, 2025*, which would permit the government to establish criteria to designate special economic zones, designate such zones, and determine which laws, regulations, permits and approval processes would and would not apply within these zones. The Act further proposes to include “trusted proponents,” which could be similarly exempted or have altered requirements for laws, regulations, permits and approval processes.

The powers proposed in the *Special Economic Zones Act, 2025* are an unnecessary transgression of the public good and this Act should not be passed.

The powers outlined in this proposed Act undermine the fundamental principle that laws are intended to protect the public interest and therefore should not need to be exempted or altered in order to achieve a goal in the name of the same public interest. Duty to consult, environmental assessment and protections, and proper approvals are all put in place to ensure fair treatment and protection of human rights, natural resources, and the environment. For projects that may have implications for decades to come, taking the time to appropriately plan and balance the needs of development with the needs of consultation, conservation, and fair treatment is a prudent and measured approach, using knowledge and experience.

The proposed Act does not specify what criteria would be met to determine the necessity of implementing these powers. The powers outlined in the Act could be used in any number of situations to allow exemption from or curtailment of laws, regulations and approvals.

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The *Special Economic Zones Act* could impact farmers and farm businesses directly and indirectly. Should a farm property fall within a designated zone, or within the region impacted by the project, these powers could be used to override protections that are in place to ensure that environmental damage is not caused, or that those directly impacted, such as by expropriation, are treated fairly. It could also be used to remove by-laws already passed by local municipalities and remove requirements for consultation with local communities and stakeholders.

We recognize the government's goals to speed up or streamline permitting and simplify requirements to ensure important projects can move ahead. We support efforts to reduce burden for proponents, such as through One Window services, and ensure timely approvals.

Rather than simply exempt projects or proponents from requirements, greater effort should be made to ensure that the necessary expertise and resources are in place to facilitate proper completion of all legal and regulatory requirements in a timely manner.

The powers proposed in the *Special Economic Zones Act, 2025* are an unnecessary transgression of the public good and this Act should not be passed.

We appreciate your consideration of our concerns and recommendations.

Sincerely,



Henk Vaarkamp, President
Christian Farmers Federation of Ontario

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