

November 11, 2025

Ministry of Economic Development, Job Creation and Trade
18th Floor, 777 Bay Street, Toronto, ON M5G 2N4

Re: Consultation ERO 025-1077 – Proposed Special Economic Zones (SEZ) Criteria

On behalf of the Federation of Ontario Cottagers' Associations (FOCA), directly representing the voice of 50,000 families and hundreds of community associations across rural and waterfront Ontario, we appreciate the opportunity to comment on the proposed criteria for designating Special Economic Zones (SEZ) under the *Special Economic Zones Act, 2025*.

FOCA's vision is to sustain and enhance the cottage experience for generations. Our constituents represent a powerful economic force, owning over \$75 billion in real estate and spending \$8 billion annually on goods and services beyond their properties.

FOCA recognizes the importance of supporting economic development in Ontario. However, we remain concerned that the SEZ framework—introduced through Bill 5 and now operationalized through this regulatory proposal—risks prioritizing short-term economic benefits at the expense of long-term environmental protection, community interests, and transparent decision-making.

Our core concerns include:

1. Environmental Risk in Rural and Waterfront Areas

Many potential SEZ-designated lands are located in ecologically sensitive rural and waterfront regions. Establishing broad, province-wide eligibility criteria, without clear safeguards specific to these landscapes, could result in accelerated development that threatens lake health, biodiversity, and drinking water sources relied upon by communities and seasonal residents.

2. Insufficient Guardrails for Responsible Growth

The SEZ approach emphasizes making development “faster,” yet does not ensure that development will be *better*. Criteria should include explicit protections for natural heritage, water quality, climate resilience, and cumulative environmental impacts. Strong environmental oversight must be foundational—not discretionary.

3. Impacts on Public Consultation and Local Governance

FOCA is concerned about reduced opportunities for meaningful public consultation, erosion of local land-use planning authority, and diminished transparency. Waterfront communities have a direct stake in decisions that shape land use, infrastructure, and environmental quality. Accelerated processes must not exclude those most affected.

4. Long-Term Stewardship Must Be Embedded

Waterfront and rural environments are economic assets for Ontario—driving tourism, recreation, property values, and quality of life. Long-term prosperity requires responsible land-use planning and sustained ecosystem protection. The SEZ criteria should integrate mandatory environmental due diligence, Indigenous partnership requirements, and community consultation obligations.

Recommendations

FOCA recommends that the SEZ regulation include:

- Criteria requiring environmental impact assessment and cumulative impact review
- Explicit safeguards or exclusions for sensitive watersheds, shorelines, and headwaters
- Mandatory public consultation before designation
- Transparency in site selection and decision-making
- Mechanisms to ensure development within SEZs adheres to provincial environmental, climate, and water-protection objectives

Ontario's economy and environment are interdependent. Decisions made today must protect the natural resources and healthy communities that underpin long-term economic success.

We urge the Ministry to adopt SEZ criteria that support responsible development, uphold environmental stewardship, and respect the voices of local communities.

Thank you for considering these comments. FOCA remains committed to supporting policies that balance economic opportunity with sustainable ecosystem protection.

Sincerely,



Deborah Martin-Downs
Board Chair, Federation of Ontario Cottagers' Associations
president@foca.on.ca 705-749-3622



Lesley Lavender
Chief Executive Officer, FOCA
lesley@foca.on.ca 705-749-3622

FOCA is the Federation of Ontario Cottagers' Associations, the only go-to provincial advocacy organization committed to sustaining and enhancing the Ontario cottage experience. We work collaboratively to identify and address key issues by providing credible expertise, environmental stewardship, targeted programs and services, and a robust network of strategic partners.

Since 1963, FOCA has united Ontario's waterfront community. We are a non-profit membership organization representing over 550 lake, road, cottage, camp, and rural waterfront associations—together, 250,000 families and voters who steward 15,000 km of shoreline and 50 hectares of privately owned waterfront land from Kenora to Kingston, Lake Erie to north of Temagami. Our [2022 Economic Impact Study](#) confirmed that every 100 waterfront properties generate 63 jobs in Ontario, with 54 of those jobs in the community itself.

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