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May 26, 2025

Aris Babikian, MPP, Chair, Standing Committee on the Interior
Tanzima Khan, Clerk
Whitney Block, Room 1405
Toronto, ON M7A 1A2

Re: Bill 5, Protect Ontario by Unleashing our Economy Act, 2025

Dear Chair,

The Greenbelt Foundation appreciates the opportunity to provide a submission to the Committee as it deliberates on Bill 5.

The Greenbelt is the cornerstone of the Greater Golden Horseshoe (GGH) region's growth management and resource protection framework and delivers essential services benefiting everyone in Ontario including clean water, flood protection, food production, green space, and climate resilience. The Greenbelt supports significant agricultural and tourism economies and jobs critically important to Ontario's long-term economic resilience and competitiveness.

Our comments are largely focused on understanding the potential implications of the proposed changes to the provincial Species at Risk protection regime and potential impacts of Special Economic Zones Act (SEZA) on the Greenbelt. However, we are also concerned with other aspects of Bill 5 that risk infringement of Indigenous Rights, and impact cultural heritage and broader agricultural and natural systems, while removing environmental assessment requirements for major projects. We would highlight that our comments are made in the context of previous provincial commitments to protect the Greenbelt in its entirety.

We note that the legislation would enable the government to exempt trusted proponents or designated projects from having to adhere to provincial and municipal laws within designated Special Economic Zones. Details regarding criteria for designating trusted proponents or projects will be determined in future regulations. Additionally, the proposed SEZA provides no limits on the areas in the province it applies, or the types and size of projects it is intended to advance. Among other matters, we are concerned about potential suspension of established policies and legal frameworks that safeguard agricultural, water and natural systems in the Greenbelt and across Ontario.

We also have serious concerns about the impact of this legislation on Species At Risk (SAR) and the resulting implications for the government's ability to maintain the essential link between healthy environments, strong economies, and resilient communities, which directly rely on healthy natural systems and critical ecosystem services. Compared to the existing policy and legislative regime,

the proposed changes narrow the definition of habitat, remove the purpose of protection and recovery of SAR, move away from science-based decisions about species' listing, and replace the permitting system with voluntary registration for activities that would harm a SAR or its habitat. These changes represent a major departure from existing policy and therefore require greater discussion of alternative solutions.

We recognize and support the government's objectives to protect and strengthen Ontario's key industries, mitigate the impact of trade disruptions, and ensure the province's long-term prosperity and economic security. However, these goals can and should be pursued in a way that safeguards species and their habitats as well as larger natural heritage and water resource systems. We urge the government to recognize that key sectors of Ontario's economy, including agriculture and agri-food and outdoor recreation, fundamentally depend on the health and integrity of such systems. While trying to create favourable economic conditions, we must avoid unintended consequences on the Greenbelt, and the interconnected natural heritage, water resources, and economic systems.

We remain committed to working collaboratively with the Province to enhance the Greenbelt as a critical asset that enables population and economic growth and welcome opportunities to grow agricultural, tourism and other economies within the Greenbelt and beyond – for the benefit of all Ontarians.

In this regard, we provide the following recommendations to ensure Ontario's economic goals are advanced in the public's interest:

1. **The rights of Indigenous Peoples should be substantively upheld in all policy decisions proposed and supported by the government.** This includes respecting Duty to Consult and obtaining consent, in accordance with domestic and international obligations. It also includes the need for archaeological assessment to protect cultural heritage sites.
2. **Special Economic Zones should not be established within, or directly adjacent to, the Greenbelt, or within broader agricultural and natural systems in Ontario.** Protecting the ecological integrity and agricultural viability of the Greenbelt must remain a priority to continue to enable growth in the GGH and advance critical needs such as food sovereignty and water security. These considerations and benefits should guide the protection of agricultural and natural systems across Ontario.
3. **Provincial planning policies and municipal by-laws must continue to apply.** Any new development must adhere to the interconnected and well considered planning regime that is established in the Greenbelt and the province to support investments, coordinate activities, and retain checks and balances and public oversight.

4. **The proposed legislation should be amended to maintain the applicability of key statutes** – including the *Planning Act*, *Environmental Assessment Act*, and *Greenbelt Act* – to all Special Economic Zones, their designated proponents, and associated projects.
5. **Any planning decisions affecting the Greenbelt should follow** existing provincial and regional policies, plans, processes, and key protections provided through the Growth Plan (2020) for the GGH.
6. **The Province should actively invest in the economic growth of existing Greenbelt economies including agriculture and tourism** to drive a strong and secure economic future for Ontario.
7. **The Province should provide assurance that Greenbelt policies for protecting SAR and their habitats will be upheld and maintained.** Greenbelt Foundation research indicates that the number of SAR in the Greenbelt has doubled since 2005 suggesting its importance as a refuge in the region.
8. **The Province should engage in meaningful discussions about improving SAR legislation.** Further discussions should focus on the following considerations:
 - I. **Maintaining the spirit and intent of the current *Endangered Species Act, 2007***, for species protection, recovery, and permitting. This is essential to ensure Ontario continues to support a high level of biodiversity which underpins the quality of life of all Ontarians.
 - II. **Maintaining the same definition of ‘habitat’** as outlined in the *Endangered Species Act, 2007*. Should the ministry consider a revised definition, we strongly encourage that it be grounded in science.
 - III. **Maintaining evidence-based decisions about species listings** that are guided by the advice of a diverse group of experts.
 - IV. **Improving the existing *Endangered Species Act, 2007* permitting system** to streamline and simplify the approvals process while maintaining protections for biodiversity. We caution that changes to the permitting system could create uncertainty and confusion that may erode public trust in good stewards, such as farmers.

We understand the need for the province to act to protect Ontario’s economic future. We urge the Province to pause advancement of this bill to allow for meaningful consultations with Indigenous Rights holders, engagement with the public and development of alternative policy solutions that will benefit species, ecosystems, communities, and the economy.

We look forward to continuing to work with the province to protect the Greenbelt as a critical asset that enables prosperity in Ontario.

Sincerely,



Edward McDonnell, Chief Executive Officer