November 24, 2025

Expanding Protected Areas Project
Conservation Policy Section, Ministry of Environment, Conservation and Parks
40 St. Clair Avenue West, 14th Floor
Toronto, Ontario
M4V 1M2

Re: Expanding Protected Areas in Ontario – Additional Sites Proposed to be Regulated under the Provincial Parks and Conservation Reserves Act, 2006 (ERO-019-9306)

We, the *75* undersigned organizations, are writing to express our support for the proposal to expand Ontario's protected area system. We offer the following comments to urge the province to commit to further expanding Ontario's protected areas. Protected areas offer a practical and effective approach to conserving biodiversity and ecosystems that sustain us, while enhancing our resilience. Protected areas provide jobs and recreational opportunities for residents and are a fundamental component of our national identity.

Protected Areas in Ontario
We note that the sites in this proposal amount to an expansion of 12,600 hectares of protected areas across the province. With only approximately 11% of the province's land and waters protected, Ontario has become a laggard among its peers when it comes to nature protection. For comparison, approximately 20% of British Columbia, 17% of Quebec, and 16% of Alberta is considered protected. However, Ontario has an opportunity to become a leader within Canada.

Commit to International Targets and pan-Canadian Cooperation
We urge the Government of Ontario to commit to the Kunming-Montreal Global Biodiversity Framework as adopted during the 15th meeting of the Conference of the Parties. Specifically, we ask that the Government of Ontario formally commit to target 3 of conserving 30% of lands and waters by 2030.

Without commitments and implementation support from the province, including the formal adoption of the Ontario Biodiversity Strategy, it will be nearly impossible for Canada to meet conservation targets. We urge the Government of Ontario to align its efforts on biodiversity conservation with the 2030 federal Nature Strategy, and for the province to support pan-national efforts to halt and reverse biodiversity decline.

Commit to the Recommendations from Ontario's Protected Areas Working Group

Echoing the points made from our previous comments on last year's expansion of protected areas, the province should commit to the actions outlined in the Protected Areas Working Group's report and adopt a provincial biodiversity strategy. The province should refer to our previous comments and take the appropriate actions to:

- acknowledge that an overwhelming number of Ontario residents support the creation of parks and protected areas (86% support). This has since been supported by 2025 Abascus Data, which found that 91% of Canadians overwhelmingly agree that nature is one of the country's most valuable economic assets such that:

    - 90% [of Canadians] think that nature is critical for a sustainable economy;
    - 87% think it promotes long term resilience; and,
    - 87% think pursuing nature-based solutions is important to Canada's national strategy
- amend provincial legislation and policies to ensure the effective and permanent protection of the various types of protected area opportunities identified in the working group report;
- encourage municipalities, conservation authorities, land trusts, and industry to assess their lands to ensure effective conservation policy protections;
- advance already identified opportunities, in close collaboration with Indigenous communities and commit to nation-to-nation dialogue to advance Indigenous Protected and Conserved Areas:
    - There are numerous opportunities for protection featured on Ontario Nature's Protected Places Story Map, with 4.8 million hectares of potential protected area identified by Ontario Nature and its partners; and,
- adopt a comprehensive protected and conserved areas strategy with a clear timeline that aligns with national and international commitments to conservation.

Proposed Site Comments

We support the 43 proposed sites put forth by the province for protection and commend its efforts in advancing nature protection. We understand the proposed deregulations in three provincial parks and conservation reserves are offset by proposed additions.

Site Specific Recommendations to Further Expand Protected Areas
In addition to the opportunities arising from the Protected Areas Working Group recommendations, we offer these additional site-specific recommendations for protected areas, organized by administrative zones.

Algonquin Zone

- Highlands Corridor (includes lands in Southeast Zone as well) – a corridor connecting three provincial parks to enhance climate resilience, protect critical habitat for species at risk, and maintain natural connectivity. The Haliburton Highlands Land Trust has been advocating for the corridor's protection since 2004. The corridor consists of approximately 60,000 ha of unceded Crown Land opportunities (out of a total corridor area of approximately 100,000 ha).
    - Protecting Crown Land parcels between Kawartha Highlands Provincial Park and Wolf Island Provincial Park, including parcels immediately north and east of Wolf Island Provincial Park;
    - Connecting Queen Elizabeth II Wildlands Provincial Park to Balsam Lake and Indian Point Provincial Parks;
    - Creating a wildlife corridor between Queen Elizabeth II Wildlands Provincial Park and Kawartha Highlands Provincial Park; and,
    - Note: that there is significant private landowner interest in conservation opportunities
- Catchacoma Forest – includes 662 ha of old growth eastern hemlock forest located to the northwest of Kawartha Highlands Provincial Park. Ontario Nature, along with other local and provincial non-government organizations, have been advocating for its protection for several years and have been in dialogue with the sustainable forest license holder to seek protection through their Forest Stewardship Council certification.

Northeast Zone

- Wolf Lake – old growth red pine forest, identified as a forest reserve with a government commitment to protect it following the lapse of mining claims in the Ontario's Living Legacy Land Use Strategy. Wahnapitae First Nation is currently working with local advocacy groups, including the Save Wolf Lake Coalition, to create an Indigenous Protected and Conserved Area. Approximately 1,600 ha. The Save Wolf Lake Coalition has been advocating for the protection of Wolf Lake for decades and consists of over 15 organizations. We encourage the government to continue to respect the priorities of Wahnapitae First Nation and to adhere to the intention of the OLL-LUS by not renewing mining permits within the forest reserve.

Northwest Zone

- Farabout Peninsula – a roadless wilderness area with extensive shoreline wetlands on Eagle Lake that was originally identified for as a candidate for protected area during the Lands for Life land use planning process. Local stakeholders, in cooperation with Eagle Lake First Nation, have been advocating for its protection since 2008. The islands surrounding the peninsula have been protected as a Conservation Reserve. Approximately 1,084 ha in size. The Farabout Peninsula also notably has no mining claims present within its area, freeing it from industrial demand. We encourage the government to formally protect this area and withdraw it from mining and forestry activity.
- Black Bay Peninsula – a large contiguous roadless area (50,000 hectares) south of the trans Canada highway that is home to coastal dunes, black spruce forests and wetlands. More of the peninsula should be protected by the province. There have been significant issues with the management of the Black Bay Peninsula, most notably with the expansion of winter roads through the peninsula which goes against the management agreement of the area. Local naturalist groups have long been advocating for the permanent protection of the peninsula and the province's involvement in the sustainable management of the property.

Southeast Zone

- Kennebec Wetlands – is one of the largest wetland complexes in southern Ontario and warrants protection as a conservation reserve, at a minimum, for any Crown land portions. The province should work with any private landowners to ensure the long-term protection of this 2,500 ha area. Since 2006, the Land Between organization has been advocating for the protection of the Kennebec Wetlands.

Summary of Recommendations

To summarize our collective recommendations on this proposal, we ask that the province:

- commit to the recommended actions outlined in the Protected Areas Working Group report;
- adopt a biodiversity strategy based on national and international commitments for biodiversity conservation; and,
- include the recommended areas suggested above that represent decades long grassroots support and the priorities of the public.

We, the undersigned organizations, support the province's ongoing efforts to expand our protected areas network. An even more ambitious acceleration of protected areas would align Ontario with national efforts and make it a leader among its peers, safeguarding the future of its residents. Ontario Nature and

all the signatories below, would be pleased to work with the province to promote effective collaboration with Indigenous partners and other parties to advance future conservation efforts.

Sincerely,

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