

Subject: Opposition to **ERO 025-0694** – Proposed Removal of Protections from Wasaga Beach Provincial Park and Transfer of Crown Land

Dear Ministry of Natural Resources and Forestry,

Climate Action Newmarket Aurora expresses firm opposition to the proposed amendments under ERO 025-0694, which seek to remove lands from Wasaga Beach Provincial Park, transfer the administration of Nancy Island, and sell Crown-owned lands to the Town of Wasaga Beach.

These proposals, if enacted, would represent a dangerous precedent of declassification, fragmentation, and privatization of protected public lands, lands that currently serve as vital ecological corridors, carbon sinks, and habitats for species at risk. No part of this proposal should proceed:

1. Removal of Nancy Island from the PPCRA and Transfer to the Ministry of Tourism, Culture and Gaming

The proposed transfer of Nancy Island from the protection of the Provincial Parks and Conservation Reserves Act (PPCRA) to management under the Heritage Places Act (HPA) weakens the legal safeguards currently protecting this ecologically and culturally sensitive area.

Protected under the PPCRA, Nancy Island is part of a larger network of dunes, wetlands, and shorelines that contribute to biodiversity, provide flood mitigation, and store carbon. Its removal from the Act severs it from this ecological continuum. Transferring it for tourism-focused redevelopment even with heritage intentions opens the door to greater anthropogenic stress at a time when Ontario's ecosystems are already under immense pressure.

Moreover, this transfer disregards the duty to meaningfully consult with First Nations, who have long-standing relationships with the lands and waters of Georgian Bay. Crown land is not simply an administrative asset to be transferred or sold. It exists within a constitutional framework that affirms Indigenous rights and responsibilities.

2. Proposed Removal of Beach Areas 1, 2, New Wasaga and Allenwood Beach from Wasaga Beach Provincial Park

The proposed removal of large sections of Wasaga Beach Provincial Park, including Beach Areas 1, 2, New Wasaga and Allenwood Beach, is deeply troubling.

While the Endangered Species Act is significantly weakened by amendments from 'Bill 5', Protecting Ontario By Unleashing Its Economy Act', it is still in place and federal legislation also needs to be considered. These areas contain critically important habitats for species listed as endangered or threatened under Ontario's Endangered Species Act, such as the piping plover, Blanding's turtle, red-headed woodpecker, and red-sided dace. These animals rely on intact,

undisturbed ecosystems to survive which are already hanging on by a thread. These same lands also contain significant wetlands and coastal dune systems that serve as natural carbon sinks, filter pollutants, and absorb floodwaters, all of which are essential as climate change intensifies. Over 70% of wetlands in southern Ontario have already been lost. The removal of protections from these remaining coastal wetlands undermines Ontario's climate commitments and will contribute to long-term environmental and economic instability.

Simply put, removing these lands from park status in the name of tourism undermines the public interest. These are not vacant parcels of land; they are living ecosystems.

3. Sale of Crown-Owned Lands to the Town of Wasaga Beach

The proposed sale of Crown-owned land within the affected beach areas ignores the fundamental principle that Crown land is not simply property for municipal expansion. It is held in trust for the public and for future generations.

Such a sale requires more than municipal interest. The lands in question fall within the traditional territories of Indigenous Nations including Beausoleil First Nation and the Métis Nation of Ontario, whose rights and responsibilities under Treaty 16 and Section 35 of the *Constitution Act, 1982* must be upheld. Any proposed transfer, declassification, or sale of Crown land must not proceed without full, free, prior, and informed consent from the Indigenous Nations whose territories, stewardship obligations, and cultural heritage are directly affected. There is no evidence in the proposal that this consent has been sought or obtained.

Transferring Crown land for the purpose of intensifying tourism development along one of Ontario's most ecologically fragile shorelines is short-sighted. The proposal implies that cultural and natural heritage can be "protected" while simultaneously decoupling these lands from conservation legislation. This is both legally and ecologically incoherent.

4. Retention of Lake and Riverbed Ownership

While the decision to retain Crown ownership of the lake and riverbed portions is noted, this alone does not mitigate the wider ecological damage that will result from fragmentation and development of surrounding uplands. Healthy aquatic ecosystems depend on intact shorelines and the quality of the adjacent lands. Removing protections from the terrestrial parts of the park puts the aquatic ecosystems at risk.

Conclusion

This proposal is fundamentally incompatible with the Province's stated goals of environmental protection, reconciliation, and climate leadership. It sets a dangerous precedent for removing lands from protected status and prioritizing private or municipal development over ecological integrity and public accountability.

We strongly urge the Ministry to withdraw this proposal in its entirety. Ontario cannot afford to lose more wetlands, endangered species habitat, or carbon sinks, and it must not violate its duty to seek consent from Indigenous peoples in the management and disposition of Crown lands.

References

1. **Ontario Parks – Wasaga Beach Provincial Park**

<https://www.ontarioparks.com/park/wasagabeach>

Outlines ecological features, recreational uses, and significance of the park.

2. **Species at Risk Ontario**

<https://www.ontario.ca/page/species-risk>

Lists and describes the endangered and threatened species found in Ontario ecosystems.

3. **Wetland Loss in Southern Ontario – Nature Conservancy Canada**

<https://www.natureconservancy.ca/en/where-we-work/ontario/featured-projects/ontario-wetlands.html>

Explains the extent and impacts of wetland loss, and the role wetlands play in climate regulation.

4. **Duty to Consult – Government of Canada**

<https://www.rcaanc-cirnac.gc.ca/eng/1100100010002/1539609209333>

Clarifies the legal obligations of governments to consult Indigenous peoples on decisions involving Crown lands.

5. **Bill 5: Protecting Ontario by Unleashing Its Economy Act**

<https://www.ontario.ca/laws/statute/s23005>

Outlines legislative amendments that have reduced environmental protections across Ontario.