



20 November 2025

Expanding Protected Areas Project  
Conservation Policy Section  
40 St. Clair Avenue West, 14<sup>th</sup> Floor  
Toronto, ON  
M4V 1M2

By Email: [Protected.Areas@Ontario.ca](mailto:Protected.Areas@Ontario.ca)

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

Dear Sirs:

The Ontario Rivers Alliance (ORA) is a not-for-profit grassroots organization with a mission to protect, conserve, and restore riverine ecosystems across the province. The ORA advocates for effective policy and legislation to ensure that development affecting Ontario rivers is environmentally and socially sustainable.

Ontario's proposal to regulate 43 new or expanded protected areas under the Provincial Parks and Conservation Reserves Act, 2006 (PPCRA) is a step in the right direction — but it is far too small, lacks strategic intent, and falls well short of what biodiversity and climate science require. Ontario protects less than 11% of its land base, despite Canada's binding commitment to protect **30% of terrestrial and inland waters by 2030**. This proposal represents incrementalism dressed up as conservation progress. Without a serious, science-based, Indigenous-led strategy — and without committing to 30x30 — Ontario will continue to fall behind while biodiversity collapses and climate impacts intensify.

## 1. The Scale of Expansion Is Not Credible in the Context of 30x30

Ontario proposes ~12,600 ha across 43 sites, on top of the earlier 10,324 ha under ERO 019-8618 — together still representing a negligible fraction of what is required.<sup>1</sup> Ontario currently protects under 11% of its land; meeting 30x30 would require **over 20 million hectares** of new protected areas — the equivalent of 26 Algonquin Provincial Parks.<sup>2</sup>

Global biodiversity science is unequivocal: protecting **at least 30%** of lands and freshwater by 2030 is the minimum threshold to avoid irreversible ecosystem decline.<sup>3</sup> These fragmented additions do not reflect the scale or urgency of the crisis.

### **Recommendation:**

Ontario must adopt and legislate a **30% by 2030** land and freshwater protection target, aligned with Canada's 2030 Nature Strategy.



## 2. Opportunistic Parcels, Not a Science-Based Protected Areas Network

These additions are framed as completing “remaining” Ontario’s Living Legacy (OLL) sites and formalizing previously acquired parcels — not as a strategic plan to protect climate corridors, water security, or biodiversity hotspots.<sup>4</sup>

Small, scattered parcels cannot achieve ecological integrity without:

- connectivity,
- watershed-scale planning,
- representation of under-protected ecosystems, and
- identification of climate refugia and Key Biodiversity Areas.

Canada’s leading protected areas and climate adaptation science stresses that protection must focus on **the right areas, not just the available areas**.<sup>5</sup>

### Recommendations:

1. Publish a **provincial protected areas strategy** identifying priority landscapes for biodiversity, freshwater protection, and climate resilience.
2. For each site, provide:
  - Ecosystem types and condition;
  - Species at risk;
  - Watershed functions;
  - Climate-corridor and connectivity value.

## 3. Weak Indigenous Rights Commitments & No Support for Indigenous-Led Conservation

The notice states that Indigenous rights will “continue to be exercisable,” but provides no commitment to co-governance, shared decision-making, or recognition of Indigenous Protected and Conserved Areas (IPCAs).<sup>6</sup>

Across Canada, IPCAs are delivering some of the **largest, most ecologically intact protected areas** and represent the most credible path to meeting 30x30.<sup>7</sup> Ontario is ignoring IPCA proposals already declared by First Nations and recommendations from national IPCA working groups.<sup>8</sup>

### Recommendations:

1. Require **free, prior, and informed consent (FPIC)** of affected Indigenous Nations for all new designations.
2. Create and fund a **province-wide IPCA program** in partnership with Indigenous governments.
3. Provide site-specific clarity on territorial overlap, stewardship roles, and Nation-requested governance structures.

## 4. Deregulation Swaps Are Ecologically Risky and Lack Transparency



Ontario proposes to *remove* lands from three existing protected areas and “replace” them with larger additions to maintain total area.<sup>9</sup> Area is not the correct metric; ecological integrity is. Removing a rare fen or intact corridor and replacing it with degraded, fragmented forest is not “no net loss.” No ecological assessment is provided to justify these swaps.

### **Recommendations:**

1. Place a moratorium on any park boundary reductions unless there is clear evidence that the lands to be removed are of demonstrably lower ecological and cultural value.
2. Publish ecological assessments for each proposed removal, including climate, hydrologic, and connectivity impacts.

## **5. Emphasis on Hunting Expansions and “No New Costs” Undermines Ecological Integrity**

The proposal promotes expanded hunting in multiple sites — including an existing park where hunting is currently prohibited.<sup>10</sup> It also claims “no new costs” to regulated entities — implying conservation will not receive meaningful investment.

Effective protected areas require:

- adequate staffing,
- Indigenous guardianship programs,
- restoration efforts,
- enforcement capacity, and
- climate adaptation planning.

Ecological integrity — the first priority of the PPCRA — cannot be delivered at **zero cost**.

### **Recommendations:**

1. Restrict hunting in high-use public recreation areas and require population-based ecological rationale for all hunting allowances.
2. Replace “no new costs” language with a realistic **funding and staffing plan** for new and expanded protected areas.

## **6. No Climate-Resilience or Watershed-Function Analysis**

Protected areas are critical climate-resilience infrastructure: they store carbon, stabilize hydrology, maintain baseflows, protect wetlands, and safeguard coldwater refugia. The notice barely mentions climate change, despite the PPCRA’s requirement to manage for long-term ecological integrity.

Canada’s 2030 Nature Strategy explicitly ties expanded protected areas to climate adaptation.<sup>11</sup> Ontario’s proposal includes none of the necessary climate analysis.

### **Recommendations:**

1. Conduct a **climate-resilience and watershed-function assessment** for each proposed site, including:
  - Flood attenuation and drought buffering;



- Wetland and headwater protection;
  - Carbon storage and sequestration;
  - Coldwater habitat significance; and
  - Climate corridor functions.
2. Prioritize protection of intact rivers, wetlands, peatlands, and headwaters.

## 7. Consultation Process Is Too Thin for Decisions Intended to Be Permanent

A 45-day comment window for 43 dispersed sites is inadequate and inaccessible to communities, conservation groups, and many Indigenous Nations. The PPCRA envisions permanent protection — not quick, under-informed regulatory changes.

### Recommendations:

1. Extend the consultation period and provide **site-specific information packages**.
2. Adopt a multi-stage engagement process (concept → draft → final), not a single ERO posting.

### Conclusion

Formalizing these 43 areas is preferable to leaving them in limbo — but it is not credible conservation leadership. Ontario must move from opportunistic, piecemeal additions to a **strategic, Indigenous-led, science-based protected areas network** that protects freshwater systems, climate corridors, biodiversity hotspots, and intact landscapes at the scale the crisis requires.

Ontario has the capacity and public support to meet, and exceed, 30×30. What is missing is the political commitment to prioritize ecological integrity over convenience, deregulation, and short-term development interests. **These 43 sites should be the starting point, not the ceiling**, of Ontario's protected areas expansion.

Respectfully,

Linda Heron  
Chair, Ontario Rivers Alliance  
(705) 866-1677

### Endnotes

<sup>1</sup> Ontario Ministry of the Environment, Conservation and Parks. ERO 019-9306 – Proposal to Expand Protected Areas in Ontario (2025).

<sup>2</sup> Ontario Nature. "How Far Is Ontario From 30 by 30?" (2023). <https://ontarionature.org/30-by-30-progress-report/>

<sup>3</sup> Secretariat of the Convention on Biological Diversity. Kunming–Montreal Global Biodiversity Framework (2022). <https://www.cbd.int/gbf/>

<sup>4</sup> MECP. Ontario's Living Legacy – Land Use Strategy Review.



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<sup>5</sup> *Environment and Climate Change Canada*. Synthesis of Freshwater Science in Canada. <https://www.canada.ca/en/environment-climate-change/services/water-overview/protecting-freshwater/national-freshwater-science-agenda/synthesis-freshwater-science-overview/synthesis.html>

<sup>6</sup> *ERO 019-9306, Indigenous Engagement Section*.

<sup>7</sup> *Indigenous Circle of Experts (ICE)*. We Rise Together (2018). <https://www.conservation2020canada.ca>

<sup>8</sup> *Assembly of First Nations*. Supporting Indigenous Protected and Conserved Areas (2023).

<sup>9</sup> *ERO 019-9306, Proposed Redesignations / Deregulations*.

<sup>10</sup> *Ibid.*, *Hunting and Recreational Use Provisions*.

<sup>11</sup> *Government of Canada*. 2030 Nature Strategy (2023).

<https://www.canada.ca/en/services/environment/conservation/nature-2030.html>