



Nov. 24, 2025

To: Review team for the proposed Expanded Protected Areas in Ontario, Protected.Areas@Ontario.ca

Re: Biigtigong Nishnaabeg Comments on the Additional Sites Proposed to be Regulated under the Provincial Parks and Conservation Reserves Act, 2006.

Please accept this letter as the formal response of Biigtigong Nishnaabeg (formerly the Ojibways of Pic River First Nation) to the Environmental Registry of Ontario (ERO) posting concerning the proposed expanded protected areas in Ontario under the *Provincial Parks and Conservation Reserves Act* (PPCRA).

Biigtigong Nishnaabeg is not a signatory to the Robinson Superior Treaty of 1850 and has filed a claim for Aboriginal title in the Ontario Superior Court of Justice (court file no. CV-07-018). Biigtigong Nishnaabeg is currently in settlement negotiations with both Canada and Ontario regarding this claim. By asserting Aboriginal title, Biigtigong Nishnaabeg has given notice to the Crown that it has never ceded its lands, or agreed to share its lands, through the signing of a treaty.

Biigtigong Nishnaabeg has reviewed the proposed additional sites and has determined that none of the sites fall within Biigtigong Nishnaabeg's exclusive Aboriginal title area. That said, Biigtigong Nishnaabeg strongly advises Ontario that future expansion of protected and conserved areas should be implemented through the creation and recognition of Indigenous Protected and Conserved Areas (IPCAs). The "Crown" lands that Ontario is designating as parks and protected areas are in fact treaty lands and, in some cases, unceded Aboriginal title lands. Therefore, these lands should only be designated for protection under the sovereign authority and laws of the local First Nation in whose territory these lands reside. IPCAs are recognized by Canada and by international actors including the International Union for the Conservation of Nature (IUCN) as one of the most effective means of protecting against biodiversity and habitat loss. IPCAs elevate this effort by also incorporating the importance of culture, language, socio-economic factors and traditional land use as part of conservation efforts.

To-date, Ontario has refused to recognize IPCAs. Such an action can only be interpreted as ignorance towards the efficacy of IPCAs, and also a willful refusal to acknowledge the inherent rights and jurisdiction of First Nations over the lands where they have existed since time immemorial. Ontario must move to recognize, promote and protect IPCAs.

With Respect,

Juanita Starr, Director, Sustainable Development, Biigtigong Nishnaabeg

Cc: David Carruthers, PlanLab, david@planlab.ca
Tracy Zanini, Sociality Consulting Inc., tracy.zanini@sociality.ca