

October 23, 2026

Conservation Policy Section,
Ministry of Environment, Conservation and Parks
4th Floor, 300 Water Street
Peterborough, Ontario
K9J 3C7

Re: Proposed Regulatory Amendments under the *Provincial Parks and Conservation Reserves Act, 2006* to Expand Ontario's Protected Areas Network ([ERO-026-0904](#))

Ontario Nature, alongside our Nature Network of over 160 community-based groups and provincial partners, collectively strive to protect and restore nature for all species and future generations. Within Ontario, we represent over 130,000 members and supporters.

In its 95-year history, Ontario Nature has played a key role in the creation and expansion of Ontario's protected areas network. As such, the 56 undersigned organizations, support this proposal to expand Ontario's protected areas network. 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.

Increasing the Protected Areas Network

We note that the sites in this proposal amount to an expansion of approximately 2,300 hectares through the creation of five new protected areas and adding land to 12 existing protected areas. We applaud the province for these and other recent protected areas additions over the last couple of years and urge the province to accelerate efforts to expand the protected areas network. There are significant opportunities across Ontario to increase the amount of land and water area protected to meet national and international targets while closing the gap with other large provinces. Ontario is currently at just over 11% of its total land and water area protected. This is compared to Quebec at 17%, British Columbia at 20% and Alberta at just over 15%.

As noted in previous submissions, the expansion of protected areas is supported by a majority of Ontarians and groups across the province have been advocating for the protection of areas not noted in this proposal. For further information, refer to the following submissions:

[Protected Area Expansions for Missinaibi Provincial Park and Woodland Caribou Provincial Park \(ERO: 019-8972\)](#)

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

[Expanding Protected Areas in Ontario – Site Proposed to be Regulated Under the Provincial Parks and Conservation Reserves Act, 2006 \(ERO: 019-8618\)](#)

These submissions identify additional opportunities across many zones in Ontario that have yet to be regulated under the *Provincial Parks and Conservation Reserves Act, 2006*.

Proposal Specific Comments

The proposal includes the deregulation of approximately 16 hectares across five protected areas, two of which are specific to facilitating work along Highway 17, while the other three are to correct mapping errors. For Lake Superior Provincial Park and Rainbow Falls Provincial Park, 5.25 hectares is proposed for deregulation in each park. Similar to comments made regarding removal of lands from [French River and Grundy Lake Provincial Parks in 2025](#), this proposal does not contain information on the quality or sensitivity of lands proposed for deregulation or the expected environmental impacts of highway work. The proposal does not identify how the Ministry of Environment, Conservation and Parks (MECP) will work with the Ministry of Transportation (MTO) to identify opportunities to improve wildlife crossings in these areas. For Rainbow Falls Provincial Park it does not identify a timeline for potential return of those lands to the park or the level of restoration that would be required.

The proposal also identifies additions to 12 provincial parks and conservation reserves across the Algonquin, northeast, northwest, southeast and southwest zones. For McCrae Lake, the proposal includes an addition and a redesignation from conservation reserve to natural environment class provincial park. We support the redesignation as long as ecological integrity continues to be the primary factor for management decisions.

The proposal also identifies five new provincial parks and conservation reserves, four of which are in the southeast zone. The creation of Groveton Bog Provincial Park (419 ha) and Merrickville Provincial Park (316 ha) represent important strides in protecting these vital and sensitive habitats in a region that continues to lose wetlands. The addition to Ojibway Prairie Provincial Park (126 ha) is also notable given the unique and urban nature of these habitats. We urge MECP to continue to work with private landowners and the land trust community to expand habitat protections in the southwest and southeast zones given the overall lower number of protected lands and waters in southern Ontario, prevalence of private land, and the unique and significant ecosystems and biodiversity in these regions.

Summary of Recommendations

To summarize our collective recommendations on this proposal, we respectfully ask that MECP:

- review past submissions to clarify if previously identified sites are under consideration for protection;
- provide clarity on the expected environmental impacts of the deregulations noted in the proposal, whether additional lands have been identified to be added to these parks to offset these losses, a timeline for potential restoration or return of lands in the case of Rainbow Falls Provincial Park and what work is being undertaken with MTO to improve wildlife crossings;
- work with private landowners and the land trust community on a coordinated strategy to increase habitat protections throughout southern Ontario to increase connectivity and ecosystem representation for the new provincial parks and conservation reserves noted in this proposal; and,
- work with Ontario Nature and its partners to expand the protected areas network across the province by reviewing and advancing the 4.8 million hectares of potential protected areas identified in Ontario Nature's [Protected Places StoryMap](#), if consented to by Indigenous Nations.

Collectively, we support the province's ongoing efforts to expand our protected areas network. More ambitious expansion of protected areas would align Ontario with national efforts and make it a leader among its peers, safeguarding the future of its residents. Protecting Ontario requires protecting the

natural ecosystems and species that sustain us. Ontario Nature and all the signatories below, would be pleased to work with the province to promote effective collaboration with Indigenous Nations and other parties to advance future conservation efforts. To discuss our recommendations in this and previous submissions, or to meet to discuss the opportunities across the province, please contact Tony Morris, Conservation Policy and Campaigns Director at tonym@ontarionature.org or 416-444-8419 ext. 239.

Sincerely,

Tony Morris

*Conservation Policy and
Campaigns Director
Ontario Nature*

Zoe Green

*Co-Founder
Action 13*

Peter Quinby

*Chair and Chief Scientist
Ancient Forest Exploration and
Research*

Elizabeth White

*Founding Director
Animal Alliance of Canada*

Liz Benneian

*Chair
Biodiversity and Climate Action
Niagara*

Amy Schnurr

*Executive Director
BurlingtonGreen Environmental
Association*

Peter McLarty

*Vice-Chair
Clean North*

Michael Douglas

*Chair
Concerned Citizens of Ramara*

Ann Flynn

*Executive Director
Durham Region Field Naturalists*

Barbara Steinhoff

*Executive Director
Earthroots Fund*

Tim Gray

*Executive Director
Environmental Defence Canada*

Jarvis Strong

*Executive Director
Escarpment Corridor Alliance*

Aileen Petrozzi

*President
Essex County Naturalists Club*

Catalina Anghel

*Secretary
Four Seasons Conservancy*

Susan Moore

*President
Friends of Salmon River*

Janet Stavinga

*President and Co-Founder
Friends of Stittsville Wetlands*

Lorraine Green

*Co-Chair
Grandmothers Act to Save the
Planet (GASP)*

Richard Witham

*Chair
Greater Sudbury Watershed
Alliance*

Margaret Beaudette

*President
Halton North Peel Naturalist
Club*

Sharon Lovett

*Co-Chair
High Park Nature*

Richard Heron

*President
Huntsville Nature Club*

Peter Krats

*Co-President
Ingersoll District Nature Club*

Miranda Virtanen

*Executive Director
Junction Creek Stewardship
Committee*

Stephanie Blackmore

*Program Coordinator
Kawartha Field Naturalists*

Pat Morden
Chair
Lakeshore Eco-Network

Josh Suppan
President
National Farmers Union –
Ontario

Bernie Solymar
President
Norfolk Field Naturalists

Andrew McCammon
Executive Director
Ontario Headwaters Institute

Denis Paccagnella
President
Orillia Naturalists' Club

Linda Sunderland
President
Peterborough Field Naturalists

Ron Prickett
President
Sault Ste. Marie Naturalists of
Michigan and Ontario

Jeff Kaiser
President
South Peel Naturalists' Club

Otto Peter
President
Thickson's Woods Land Trust

Amelia Rose Khan
Volunteer
Toronto350

Phyllis Cacciotti
President
Manitoulin Nature Club

Douglas Lynch
President
Nature League

James Kamstra
Vice President
North Durham Nature

Dr. Erica Shelley
Executive Director
Ontario Organic

Kenneth Westcar
Secretary/Treasurer
Oxford County Trails Council

Gerry Jenkison
President
Prince Edward County Field
Naturalists

Jane Garthson
Co-Chair
Seniors for Climate Action Now!

Michael Appleby
President
Stephens Bay Association

Barbara Yurkoski
Advocacy Lead
Thunder Bay Field Naturalists

Emily Wright
Advocacy Coordinator
Turtles Kingston

Jamie Kneen
National Program Co-Lead
MiningWatch Canada

Dorothy Wilson
*Communications Working
Group*
Nith Valley EcoBoosters

Martin Straathof
Executive Director
Ontario Farmland Trust

Liz Benneian
Executive Director
Ontariogreen Conservation
Association

Bob Highcock
President
Peninsula Field Naturalists

Stephanie Sobek-Swant
Executive Director
rare Charitable Research
Reserve

Wendy Nicholson
President
South Bracebridge
Environmental Protection
Group

Helen Brenner
Co-Lead
Stop Sprawl Durham

Lynn Miller
President
Toronto Field Naturalists

Matt Mair
President
Willow Beach Field Naturalists

Gloria Marsh
Executive Director
York Region Environmental
Alliance

Sylvia Bowman
Conservation Director
York Simcoe Nature Club

cc.

Kirsten Service, Director, Conservation Branch – Kirsten.service@ontario.ca

Greg Malczewski, Director, Ontario Parks Growth and Partnerships – greg.malczewski@ontario.ca

Debbie Scanlon, Manager, Conservation Policy Section – Debbie.scanlon@ontario.ca

Laura Bjorgan, Manager, Protected Areas Section – laura.bjorgan@ontario.ca