

Hello Peter,

I hope you are doing well! It's been some time since we last connected.

NOTO has been actively engaged in reviewing the various proposals posted by MNR to the ERO. The discussion paper included in one of the postings touched on Boat Caches. I wanted to follow up and share the feedback we have received from NOTO members regarding the long-standing boat cache program in Northwestern Ontario.

Our outreach to members was prompted by discussions with staff in MNR's Regional Operations Division, who approached NOTO seeking early input on the potential cancellation or significant reform of the boat cache program. The document attached to this e-mail has already been shared directly with ROD staff.

To be clear, **NOTO strongly supports the recreational and commercial boat cache program in Northwestern Ontario.** We would strongly oppose any cancellation of the program or changes that would compromise our members' commercial interests on affected lakes, or compromise the quality and sustainability of the world-class fisheries in Northwestern Ontario that NOTO members and MNR have worked collaboratively to protect over many decades.

As NOTO will outline in its submissions to the ERO under the MNR's Regulatory and Permit Reform Initiative, we are open and willing to work with MNR and other stakeholders to improve administrative efficiency and to streamline program delivery.

We are very concerned with any proposal that would eliminate the program entirely or replace it with a new occupational authority model that may be subject to consultation and lead to significant negative outcomes or losses for our members, and have a significant impact on the fisheries.

As you know, the Boat Cache Program was explicitly preserved through its inclusion in Ontario Regulation 161/17 under the Public Lands Act. We have been advised that one driver for potential changes or elimination of the program is an interpretation that the Public Lands Act may not be an appropriate tool to support fisheries protection. The evidence below does not support this view. The PLA has long been used across Ontario to advance a range of resource management objectives, including fisheries protection:

- Section 12 enables Crown land use planning decisions that limit access and dispositions to protect remote tourism and angling opportunities;
- Section 13 supports Restricted Area Orders, including those protecting lake trout habitat on Lake of the Woods and elsewhere;
- Section 14, together with R.R.O. 1990, Reg. 975 (Work Permits), is routinely applied to protect fisheries values associated with shorelands; and
- Section 28(2) is commonly used to post access restrictions that protect fisheries resources and associated commercial tourism investments.

From a policy perspective, MNR's PLA-enabled PL 4.02.01 Application Review and Land Disposition Process Policy explicitly recognizes the importance of protecting Ontario's lake trout populations. MNR fisheries management documents such as the Fisheries Management Plan for Zone 5 have

long acknowledged the value of the boat cache program.

NOTO is very interested in continuing to work collaboratively with MNR on potential administrative or regulatory streamlining of the current program. We hope that any future proposed changes would maintain the program's intent, support compliance objectives, and protect NOTO members' interests and the world-class fisheries of Northwestern Ontario.

I would welcome the opportunity to meet with you and your colleagues in January 2026 to discuss the importance of the boat cache program and explore how MNR and NOTO can continue to work together on this important file.

Take care,

**Laurie Marcil**

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# **Summary of Member Feedback on the Boat Cache Program**

Members across Northwestern Ontario expressed strong support for the Boat Cache Program, recognizing its role in protecting fisheries and maintaining accountability for both commercial and recreational users. Most operators who provided feedback do not support the elimination of the Boat Cache Program without seeing an equally enforceable, transparent and balanced framework that would ensure protections for the operators, the fisheries in NW Ontario, and hold recreational boaters accountable.

## **Key Themes from Feedback:**

### **1. Value of the Boat Cache Program**

- Provides oversight, enforcement, and accountability by providing the Ministry with a way of limiting the number of boats on any one lake, and by providing them with a way to track and identifying boats and their owners (both commercial and recreational users).
- Discourages abandonment of boats and equipment in remote areas.
- Helps sustain the fisheries by controlling access and reducing fishing pressure.

### **2. Concerns with Proposed Transition to LUPs**

- Fear that duty to consult and limited oversight for recreational users will reduce protections for operators.
- Worries that unregulated recreational access will erode the exclusivity and value of businesses built around remote, sustainable fisheries.
- Some operators doubt LUPs will provide equal protections, enforcement or transparency.
- Fear that the public will find ways to access commercial LUPs that used to be boat caches and use them causing overcrowding, increased safety risks to guests and staff, uncontrolled access and equipment misuse.
  - Also fears that public will use commercial infrastructure including dollies, ramps, trailers, boats and motorized vehicles illegally.

### **3. Environmental and Fishery Protections**

- Operators stressed that small lakes cannot withstand increased fishing pressure.
- Many outfitters already implement conservation measures above and beyond MNR standards and fear that decades of work to ensure pristine fishing experiences will be undone.
- Ministry would need to add more restrictions on access, slot sizes, and limits to ensure long-term sustainability.

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## **4. Oversight, Accountability & Enforcement**

- Loss of the program increases the risk of boat abandonment, misuse, and lack of clear enforcement mechanisms.
- Ministry would need to ensure that there will be oversight and enforcement measures in place to prevent individuals from abandoning boats in the woods and creating roads, trails, portages, etc. to access remote lakes where access is currently restricted by the boat cache program.
- Loss of a way to track and identify boats and their owners (both commercial and recreational users).

## **5. Exclusivity & Tourism Value**

- Clients value exclusive, low-traffic, high quality fishing experiences.
- Loss of exclusivity would undermine decades of work and investment.
- Increased pressure on lakes could harm both fish populations and the quality of the guest experience.
- The loss of remoteness decreases the value of the overall experience.
  - Many individuals have purchased their businesses specifically with the intent to operate as an exclusive destination with pristine fishing and those businesses are at risk losing significant value if there is a sudden high influx of resident fisherman.

## **6. Need for a Replacement System**

- If the current system needs to be refined to ease administration and compliance, members strongly advocate for a replacement process that preserves protections.
- Many want to be “grandfathered in” for whatever process the Ministry chooses moving forward and hope not to be subjected to broad public consultation processes.
- Some are open to transitioning to LUPs if existing protections for their boat caches remain intact.
- Some are very weary that the change will not provide enough protections and in areas with easier access, it could be a major problem and decimate the fisheries.