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SUBJECT: ERO Policy Proposal 025-1078 - *Natural Resources Regulatory and Permit Reform Initiative: Proposing Changes to Streamline Certain Approvals under the Public Lands Act*

On behalf of Nature & Outdoor Tourism Ontario (NOTO), thank you for the opportunity to provide comments on the Ministry's proposal to establish a new online registry regulatory regime under the Public Lands Act (PLA) for low-risk activities and occupations of Crown land.

NOTO members and the broader Resource-Based Tourism (RBT) sector rely heavily on access to Crown Lands and waters to operate their businesses and to deliver significant economic benefits to Northern Ontario. RBT operators work closely with the Ministry of Natural Resources and other ministries to responsibly manage and sustain the lands, waters, fisheries, and wildlife on Crown Lands.

Many interactions between operators and MNR involves hundreds of applications and approvals each year for activities that are typically long-term, low-risk, and environmentally benign. These include applications for various permits, leases, renewals, and other occupational authorities that often carry the same approval process and compliance conditions year after year. This represents a significant administrative burden for both the Ministry and the RBT sector which is dominated by small, family-run businesses.

For these reasons, NOTO welcomes the Ministry's proposal to establish a registry-based system for low-risk activities and occupations of Crown land. While the initial focus of the registry appears to be on energy-related testing and similar activities, NOTO strongly encourages the Ministry to consider how approvals commonly used by the RBT sector could also be incorporated into a registry model, supported by clear and appropriate standard conditions.

There are several PLA approvals that, with pre-engagement with NOTO and the sector, could be well suited to a registry approach, including:

- Approval of Type B outpost camps, as defined in PLA policy PL 4.06.01 – *Commercial Outpost Camps*
- Renewal or re-issuance of recurring land use permits for RBT operators, which represent the most common form of occupational authority
- Many shorelands-related activities and occupations critical to the sector, such as docks and boat storage
- Alternative administrative approaches to maintaining the recreational and commercial boat cache program in Northwestern Ontario, which is essential to both the commercial viability of operators and the protection of fisheries resources. To be clear, NOTO does not support any cancellation of this important program.

NOTO would welcome the opportunity to meet with the Ministry in early 2026 to review the range of PLA approvals currently issued to RBT operators and to discuss which activities may be appropriate candidates for a registry model and what standard conditions could apply.

We see a clear opportunity for a “win-win” outcome. Regulatory streamlining would allow the Ministry to focus resources on higher-risk activities, while operators would benefit from reduced costs, reduced administrative burdens, improved predictability, and greater investment certainty.

Thank you for the opportunity to provide these comments. NOTO looks forward to continued engagement with the Ministry as this initiative moves forward. We hope to work collaboratively to expand the use of this new regulatory model where it makes sense for both government and the outdoor tourism sector.

Sincerely,



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ABOUT NOTO:

Founded in 1929, NOTO is dedicated to proactive planning, development and promotion of a strong nature and outdoor tourism industry in Ontario. We support the resource-based tourism (RBT) sector through advocacy, information sharing, and business support, and we work with government to help guide regulations and policies that support a strong, sustainable, and competitive outdoor tourism industry in Ontario.