



August 24th, 2026

Amy MacFarlane
Ministry of Natural Resources
Strategic and Indigenous Policy Branch
300 Water Street, 3rd Floor South
Peterborough, ON
K9J 3C7

SUBJECT: Proposing a Project Evaluation Policy to replace the Class Environmental Assessment for MNR Resource Stewardship and Facility Development Projects (ERO Policy Proposal 026-0089)

Ms. MacFarlane:

On behalf of the Northern Ontario Tourist Outfitters Association (NOTO), thank you for the opportunity to provide comments on the Ministry's proposed new Project Evaluation Policy (PEP).

The PEP would use a risk-based approach, focusing on projects with greater potential for impacts, improving efficiency, reducing duplication with other regulatory processes, and supporting meaningful engagement with Indigenous communities, stakeholders and the public as detailed in ERO policy posting 026-0089 <https://ero.ontario.ca/notice/026-0089>

Founded in 1929, NOTO is dedicated to proactive planning, development and promotion of a strong nature and outdoor tourism industry in Ontario. NOTO supports the resource-based tourism (RBT) industry through advocacy, information services and business support. We are pleased to work with Government on policies that will support a strong and vibrant outdoor tourism industry in Ontario.

NOTO members and the broader RBT sector rely heavily upon access to Ontario Crown land and waters to deliver important economic benefits to the economy of northern Ontario. In doing so, the RBT sector works closely with MNR and other ministries to help manage and sustain the lands, waters, fisheries and wildlife on Crown lands. For these reasons, we have a keen interest in all matters related to the management of Ontario's Crown lands.

General Comments

We have reviewed the MECP proposal to revoke the RSFD Class EA and the accompanying MNR policy proposal to establish a *Project Evaluation Project* framework in its place and after careful consideration, we wish to advise that we are generally in support of the MNR policy proposal.



We are pleased to see multiple direct reference to resource-based tourism as a key land use consideration that needs to be considered when proposed projects are subjected to the PEP assessment and decision whether a full project assessment is required.

Over the years and despite a solid working relationship with MNR field offices, it has been NOTO's experience that the RSFD Class EA has sometimes been a regulatory burden or impediment for the RBT sector. For this reason, we support the Ministry's policy goal as stated in the ERO posting,

... to reduce delays for routine, lower-impact projects while maintaining oversight for projects that have a greater likelihood of affecting the environment, natural resource management and Indigenous values.

Given the importance of the proposal, we look forward to working closely with MNR and its proposed establishment of the PEP framework to ensure that the land use, occupational authority and permitting needs of the RBT sector are best considered and addressed through the future PEP framework.

Specific Recommendations

NOTO is in support of key elements of the proposed PEP including:

- the proposed guiding principles for developing the PEP and
- the general framework of the proposed PEP including the approach to assessing whether the PEP applies, as well as recognition of certain exclusions including emergency projects (including wildlife disease break out), projects covered by another similar process, federally regulated projects and certain projects listed in Appendix 2 that present lower potential for impacts.

NOTO has reviewed the proposed Appendix 2 list of projects to which the PEP would not apply and we are in support of same including for purposes of greater clarity:

- **Fish and Wildlife:** fish habitat enhancement, ongoing fish stocking conducted in accordance with an approved fisheries management plan or established management direction; physical control of nuisance animals (e.g., caging and removing a skunk), preventing and controlling invasive species and non-emergency wildlife disease management (e.g., rabies control activities)
- **Lands and Resource Use:** installing signage, sale of parcels of public lands 0.5 hectares or less in size to authorize existing uses, sale of public shoreline reserves or road allowances less than 1.0 hectare in size to the upland property owner, water-related excavation, dredging and filling where undertaken in previously disturbed areas, operation, regular maintenance, repairs, upgrades or like-for-like replacement of docks, boathouses and boat launches provided the facility continues to serve the same purpose and function and the project remains within the existing footprint of the structures
- **Forestry:** personal use harvesting and permits to remove trees
- **Minor/Administrative Authorizations:** Crown land camping permits, transfer of tenure documents, post disposition activities (e.g. consents to mortgage, sublet), travel permits, hunting and fishing licences, trapping licences and Type B land use permits (RLUPs)



Specific to Appendix 2 however, we recommend that:

- work be undertaken to migrate approval for Type B land use permits to the new *Public Lands Act* online registration system for low-risk activities and occupations of public lands and
- that the list of minor/administrative authorizations be expanded to specifically include: (1) the transition of resource-based tourism land use permits to Crown leases where the land use permits is associated with an existing occupation and use of Crown land in good standing and (2) the disposition of “shelf RBT outpost camp locations” where the site was previously used for such use and the site has either been temporarily surrendered or retired.

Next Steps

In closing, NOTO appreciates the opportunity to provide comments on this policy proposal.

Given the importance of this policy proposal to NOTO, its members and the broader RBT sector, we would very much appreciate the opportunity to e-meet with Ministry staff to review our comments and to discuss how best the needs of the sector can be addressed by MNR in the proposed PEP framework.

Please contact myself at your convenience to arrange such a meeting.

Sincerely,

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c.c. Gwen Young, Director, MNR Strategic and Indigenous Policy Branch
Kathleen O'Neill, Director, MECP Environmental Assessment Branch