



September 18th, 2026

Public Input Coordinator
MNR -CFLPB - Crown Lands Policy Section
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RE: **Proposed regulation on travel on closed public-land roads** ([ERO #026-0676](#))

Dear Public Input Coordinator:

On behalf of the Northern Ontario Tourist Outfitters Association (NOTO), thank you for the opportunity to comment on the Ministry's proposal to allow travel on closed roads on public lands, outlined in [ERO policy posting 026-0676](#). NOTO and its resource-based tourism members have significant concerns and do not support the proposal as presented.

Our concerns are organized by theme.

THE VALUE OF TOURISM:

Tourism is one of Ontario's largest economic sectors, contributing **approximately \$30.9 billion to provincial GDP, supporting approximately 312,000 jobs and generating approximately \$12.1 billion in government tax revenues**. Destination Northern Ontario has reported that Northern Ontario's **resource-based tourism sector contributes more than \$400 million in GDP**, retained in the region during a four- to five-month operating season.

These benefits extend across Northern Ontario to pilots, mechanics, fuel suppliers, restaurants, grocery stores, guides, outfitters, contractors and other local businesses.

Remoteness Is a Core Tourism Asset:

Northern Ontario's pristine wilderness is central to its tourism appeal. Approximately 296 fly-in lodges depend on remote lakes and forests. Guests often pay upwards of \$3,000 per person for access to untouched landscapes and lightly pressured fisheries.

Remoteness is the product these businesses sell. Once road access changes an area's character, genuine remoteness is difficult—if not impossible—to restore.

Road closures help preserve wilderness values and sustain remote tourism; that protection should not be weakened.



TRAVEL PERMITS HAVE VALUE:

In a NOTO survey earlier this year, operators who regularly apply for travel permits described the process as straightforward, timely and generally not subject to a duty to consult.

When supported by enforcement, travel permits protect remote tourism businesses by managing access. They also help MNR track where, why and how often closed roads are used.

Like boat-cache controls, travel permits help protect remote fisheries. Limited access reduces angling pressure and sustains some of Northern Ontario's most valuable tourism assets.

NOTO is not seeking to exclude other users; we seek to preserve remoteness by managing how these lakes are accessed, with limited exceptions.

INCONSISTENCIES BETWEEN DISTRICTS:

Member consultations identified inconsistent permitting across districts, with similar consequences across Northern Ontario: new trails, motorized access to designated remote-tourism lakes, and private camp owners transporting guests and equipment by road where resource-based tourism operators must remain fly-in only. Some private camps on closed roads are also marketed as short-term rentals (AirBnBs) without equivalent operating conditions, creating a commercial and competitive imbalance.

Inconsistent permitting has already altered the character of some high-value remote destinations.

If implemented inconsistently, the proposal could undermine protections negotiated through forest management planning, including Resource Stewardship Agreements.

CONCERNS SURROUNDING ENFORCEMENT:

We value the hard work of Conservation Officers. However, MNR does not currently appear to have sufficient staffing or resources to enforce the proposed change effectively.

Removing permits for the identified groups would make it difficult to monitor closed-road use, verify eligibility and destinations, track Crown land activities, and prevent travel beyond authorized locations.

Greater access—authorized or not—could increase pressure on fisheries and wildlife, recreational conflict, noise, illegal dumping and the spread of invasive species through inadequately cleaned vehicles, trailers, boats and equipment.

The proposed changes would therefore require substantially more oversight, funding and enforcement capacity.



RECOMMENDATIONS:

As MNR modernizes permitting and related policies, NOTO recommends that it:

- Conduct a comprehensive land-use planning review to identify and protect high-value remote areas where restricted access supports conservation and tourism, while designating appropriate areas for road-based recreation.
- Strengthen and standardize travel-permit policies across districts so closed-road access remains consistent with each property's original access conditions. Prohibit recreational motorized use where needed to preserve remote character and reduce conflict.
 - Apply equivalent access rules to comparable commercial operations; for example, if tourism operators must fly in guests and equipment, private camp operators should meet the same requirement.
 - When issuing travel permits ensure that their use will not erode protections offered to tourism operators through Resource Stewardship Agreements as part of the forest management process.
- Increase enforcement in high-traffic closed-road areas where unauthorized access or commercial activity, including short-term rentals, is suspected.

CONCLUSION:

Ministry staff have advised that travel permits are relatively simple to administer, and many operators consider them essential to managing access and protecting remote tourism assets and areas.

NOTO opposes the proposal as presented. We urge the Ministry to continue using travel permits as a tool but revise it to ensure consistent application across districts and continued protection for remote wilderness destinations where road access would fundamentally diminish the area's value and character.

Take care,

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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. NOTO supports the resource-based tourism (RBT) industry through advocacy, information services and business support. We work with Government on policies that will support a strong and vibrant outdoor tourism industry in Ontario.