



The Voice of Ontario's Nature & Outdoor Tourism Industry Since 1929.

September 17, 2026

Ms. Jennifer McKay
Manager, Crown Land Policy Section
MNR Crown Forests and Lands Policy
Branch 300 Water Street, 5th Floor, North
Tower Peterborough, ON
K9J 3C7

RE: **ERO Policy Proposal 026-0693 Changes to Streamline Natural Resource Permits: Changes to Streamline Approvals under the PLA and Modernize Compliance Provisions**

Dear Ms. McKay:

On behalf of the Northern Ontario Tourist Outfitters Association (NOTO), thank you for the opportunity to provide comments on the Ministry's proposal to amend the *Public Lands Act* to provide regulation making authority to allow travel on closed roads for specific people or in specific situations and update enforcement tools and processes to ensure public lands are safe, protected, used responsibly, and are available for authorized uses, as detailed in [ERO policy posting 026-0693](#).

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.

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.

We have reviewed this proposal and wish to advise that while the details of many of the aspects of the **enforcement compliance provisions** are general and not described in detail, we are in support of the proposal subject to follow-up engagement with NOTO.

The proposed amendments include changes to:

- clarify it is an offence to occupy or take possession of public land without authority
- make it an offence to block access to public land, or a road on public land, and enable MNR to restore access and charge the owner of a vehicle used to block access
- enable MNR to issue orders to comply with the PLA, its regulations and instruments, and make it an offence to fail to comply with such an order



- add seizure and forfeiture provisions where an offence has occurred
- extend the statutory limitation period from two years to five years after the date MNR is aware of an offence
- enable administrative monetary penalties to be set out in a regulation and update existing general penalties under the Act
- enable MNR to seek investigative warrants to enable surveying related to investigations, as well as production orders to compel an entity to produce information or records related to an investigation and
- authorize the making of regulations to implement the enforcement and compliance provisions.

The proposed enforcement and compliance modernization changes would enable MNR to:

- address unauthorized occupations of public land more efficiently
- restore access quickly when blockages prevent access to public land
- support fairness for those who use and occupy public land in compliance with the Act
- provide sufficient time to address offences, including carrying out investigations
- better deter the unauthorized use or occupation of public land if administrative monetary penalties are enabled and maximum fines for general penalties are amended so they are proportional to the scale of an infraction and
- provide compliance tools and options during investigations to ensure public lands are available for all authorized users.

We also encourage the Government to enhance MNR's enforcement budget to ensure there is enough staff on the ground to enforce the proposed and new regulatory and permit reforms.

Specific to the proposal to amend the PLA to provide regulation making authority to allow travel on closed roads, NOTO will separately offer comments on MNR ERO proposal 026-0676.

In closing, NOTO appreciates the opportunity to provide comments on this policy proposal. As one of the key commercial users of and tenants on Crown lands and waters in Ontario, the details of the proposed enforcement and compliance provisions are of keen interest to sector and we would be pleased to offer additional advice as the enforcement provisions are developed. NOTO welcomes outreach from MNR to further discuss these provisions prior to their approval and implementation.

Please do not hesitate to contact myself to further engagement on this important topic. We look forward to continuing to work with MNR as the policy and permitting review process continues.

Take care,

Laurie Marcil
Executive Director
laurie@noto.net
705-499-7556

c.c. Spooner Collins, Director, MNR Crown Forests and Lands Policy Branch
Rick Watchorn, Director, MNR Enforcement Branch