

Chapter 1

Section 1.25

Ministry of the Environment, Conservation and Parks

Ministry of Natural Resources and Forestry

Follow-Up on 2020 Value-for-Money Audit:

Conserving the Natural Environment with Protected Areas

RECOMMENDATION STATUS OVERVIEW

	# of Actions Recommended	Status of Actions Recommended				
		Fully Implemented	In the Process of Being Implemented	Little or No Progress	Will Not Be Implemented	No Longer Applicable
Recommendation 1	3				3	
Recommendation 2	2				2	
Recommendation 3	2	2				
Recommendation 4	3		3			
Recommendation 5	3		1	2		
Recommendation 6	3				3	
Recommendation 7	1	1				
Recommendation 8	2				2	
Recommendation 9	2			2		
Recommendation 10	4			4		
Recommendation 11	2			2		
Recommendation 12	1			1		
Recommendation 13	1			1		
Recommendation 14	1		1			
Recommendation 15	2			2		
Recommendation 16	2	1			1	
Recommendation 17	2	1	1			
Total	36	5	6	14	11	0
%	100	14	17	39	31	0

Note: Recommendations 1, 2, 4-6, 8-13 and 16 were made to the Ministry of the Environment, Conservation and Parks. Recommendations 3, 7, 14, 15 and 17 were made to the Ministry of Natural Resources and Forestry.

Overall Conclusion

The Ministry of the Environment, Conservation and Parks (Environment Ministry) and the Ministry of Natural Resources and Forestry (Natural Resources Ministry), as of October 1, 2023, have fully implemented only 14% of actions we recommended in our *2020 Annual Report*. The ministries had made progress in implementing an additional 17% of the recommendations.

The Environment Ministry has fully implemented the recommended action to screen submissions for sites to be reported as protected areas within a defined and reasonable period of time. The Natural Resources Ministry has fully implemented the recommended action to centrally track its decisions on external requests for land-use amendments to create recommended provincial parks and conservation reserves.

However, the ministries have made little or no progress on 39% of the recommended actions. In our follow-up, we found that the Environment Ministry has not established a long-term area-based target for expanding its protected areas with associated timelines. The Environment Ministry also has not developed a long-term strategy that outlines specific actions to permanently protect a network of provincial parks and conservation reserves. We also found that the Natural Resources Ministry has not sought direction on the Province's position to support the creation of Indigenous Protected and Conserved Areas.

The ministries will not be implementing 31% of the recommended actions. The Environment Ministry will not be reviewing the impact of the current level of commercial logging in Algonquin Provincial Park in order to treat more lands within the park as a protected area (in which commercial logging would not be allowed). The Environment Ministry will also not be allocating the necessary science and planning staff so that it can meet its legislative responsibility under the *Provincial Parks and Conservation Reserves Act, 2006* to maintain, and restore when possible, the ecological integrity of provincial parks and conservation reserves.

The status of actions taken on each of our recommendations is described in this report.

Background

Protected areas are places where nature is allowed to function relatively unaffected by human activities. These areas are an effective way to conserve species and habitats by acting as safe havens from the harmful impacts of activities like logging, mining, urban development and agriculture. They also serve people and communities through essential services such as water filtration, flood control, crop pollination and climate regulation. Nature provides sources of food, clean air and water, as well as places for enjoyment and recreation.

In addition to conserving biological diversity—which is known as biodiversity—protected areas contribute directly to the economy. A 2011 study for the Canadian Parks Council, a group made up of representatives from federal, provincial and territorial parks agencies, estimated that provincial and federal protected areas in Ontario supported more than 6,400 full-time jobs, created \$305 million in labour income, generated \$48 million in tax revenue for governments, and contributed more than \$466 million to the province's gross domestic product. Such economic benefits are at risk as the World Economic Forum ranked biodiversity loss as a top-five risk globally over the next decade.

The Environment Ministry and the Natural Resources Ministry share the primary responsibilities for creating and managing protected areas in Ontario.

At the time of our audit in 2020, protected areas covered 10.7% of Ontario. While the Environment and Natural Resources ministries manage the majority of these protected areas, entities such as the federal government, First Nations communities and conservation groups manage other types of protected areas, including national parks and privately owned conservation sites.

Our audit examined whether the Environment Ministry and the Natural Resources Ministry are permanently protecting a network of provincial parks, conservation reserves and other protected areas that conserves biodiversity and that, in totality, represents Ontario's natural regions. We looked at the two ministries' processes for identifying and creating new

protected areas, as well as their management of existing protected areas.

Our audit findings included the following:

- The Environment Ministry and Natural Resources Ministry did not have sufficient science and planning staff to manage existing protected areas or expand the province’s protected areas network.
- The Environment Ministry did not collect sufficient and necessary information about species at risk, invasive species that harm biodiversity, or whether activities like hunting, fishing and trapping are ecologically sustainable in individual provincial parks and conservation reserves.
- Two-thirds of Algonquin Provincial Park does not meet criteria for a protected area because of commercial logging. Commercial logging—an activity that is incompatible with biodiversity conservation—is permitted in the park’s “recreation/ utilization” zone, which covers 498,785 hectares. Algonquin Provincial Park has been logged since before it was established in 1893. If all of Algonquin Provincial Park met the criteria for protected areas, it would increase the total provincial protected area coverage by about 0.5%. Commercial forestry is prohibited in all other provincial parks.
- The Province was not identifying lands and establishing new provincial parks and conservation reserves in fulfillment of its legislative responsibilities under the *Provincial Parks and Conservation Reserves Act, 2006*. The law requires the Environment Ministry to permanently protect a network of provincial parks and conservation reserves that includes the best examples of Ontario’s ecosystems, serving to protect provincially significant elements of Ontario’s natural heritage and maintain biodiversity.

We made 17 recommendations, consisting of 36 action items, to address our audit findings.

Status of Actions Taken on Recommendations

We conducted assurance work between January 2022 and September 2023. We obtained written representation from both ministries that effective October 30, 2023, they had provided us with a complete update of the status of the recommendations we made in the original audit in November 2020.

Insufficient Staff for Science-Related Activities Hampers Ontario’s Ability to Meet Legal Obligation to Conserve Biodiversity

Recommendation 1

So that the Ministry of the Environment, Conservation and Parks (Ministry) can meet its legislative responsibility under the Provincial Parks and Conservation Reserves Act, 2006 to maintain, and restore when possible, ecological integrity in provincial parks and conservation reserves, we recommend that the Ministry:

- *review its staffing mix to determine the appropriate level of science staff at the park, regional or zone, and head office levels to undertake science activities;*
- *determine the appropriate level of park planners necessary to develop, review and update management plans; and*
- *allocate the necessary staff based on the results of this review.*

Status: Will not be implemented.

The Office of the Auditor General of Ontario continues to support the implementation of this recommendation.

Details

In our 2020 audit, we found that only seven of the 254 staff members at Ontario Parks, a branch within the Environment Ministry, were ecologists responsible for leading science-related activities to understand impacts on biodiversity. Ecologists are responsible

for gathering and analyzing scientific information to, for example, determine what actions are needed to recover particular species at risk or manage invasive species. One ecologist is assigned to each of the five regions across Ontario, which cover between 45 and 291 provincial parks and conservation reserves. Additionally, there were two ecologists in the Ontario Parks head office.

In our 2020 audit, we also found that only 12 staff members at Ontario Parks were park planners responsible for developing, reviewing and updating the management plans for the 630 provincial parks and conservation reserves. Depending on the region, each park planner was responsible for maintaining the management plans for between 19 and 97 provincial parks and conservation reserves. Each park planner had between four and 29 outdated or deficient plans that needed to be replaced.

In our follow-up, we found that Ontario Parks will not be assessing the appropriate numbers of science staff and park planners to meet its legislative responsibilities under the *Provincial Parks and Conservation Reserves Act, 2006*, now and into the future. Instead, the Environment Ministry informed our Office that it had provided the levels of science and planning staff at the park, region or zone, and head office it can within budgetary and staffing limitations, and has allocated available resources accordingly.

In 2021/22, Ontario Parks had 10 permanent, full-time science staff. However, no new science positions have been created since our 2020 audit, as the three additional science positions already existed (previously considered as operations staff) but are now counted as science positions. Additionally, Ontario Parks had 12 park planners. Accordingly, the number of science and planning staff remains unchanged since our 2020 audit. The Environment Ministry informed our Office that it will allocate science and planning resources each fiscal year, based on ongoing priorities and within budgetary and staffing limitations, but it will not review its staffing mix or the appropriate levels of science staff needed.

Recommendation 2

So that the Ministry of the Environment, Conservation and Parks (Environment Ministry) can fulfill its responsibilities under the Provincial Parks and Conservation Reserves Act, 2006, by planning a network of protected areas that maintains Ontario's biodiversity, we recommend that the Environment Ministry:

- *assess the human resources needed to expand protected areas; and*
- *allocate such resources.*

Status: Will not be implemented.

The Office of the Auditor General of Ontario continues to support the implementation of this recommendation.

Details

In our 2020 audit, we found that no branch or staff in the Environment Ministry were specifically tasked with expanding the province's protected area network as directed by the *Provincial Parks and Conservation Reserves Act, 2006*. As a result, identifying sites for protection and completing the process to create protected areas was not prioritized. In contrast, we found that Parks Canada has a dedicated branch with staff who are responsible and accountable for creating new protected areas.

We found that, in 2019, the Environment Ministry proposed protecting 197,835 hectares of Crown land as new provincial parks and conservation reserves, or additions to existing ones. However, the Ministry did not proceed with protecting these sites because it lacked the necessary staff and funding. The Ministry estimated that it would need a team of up to 23 full-time-equivalent staff per year over a four-year period to complete the process of formally protecting these lands.

In our follow-up, we found that Ontario Parks will not be assessing the appropriate numbers of staff to meet its legislative responsibilities under the *Provincial Parks and Conservation Reserves Act, 2006*, now and into the future, to expand Ontario's network of protected areas. We found that Ontario Parks has identified the

need to create 10 new positions to expand or establish some new protected areas. However, the positions have not been created and filled, and a budget has not been allocated. The Environment Ministry informed our Office that it assesses human resource needs and allocates staff each fiscal year—in alignment with government priorities—to expand protected areas based on ongoing priorities and resource limitations. However, the Ministry will not determine the appropriate level of staff needed to expand protected areas.

Ontario Does Not Know Whether It Is Meeting Legal Obligation to Conserve Nature in Protected Areas

Recommendation 3

So that the Ministry of Natural Resources and Forestry (Natural Resources Ministry) is compliant with the Far North Act, 2010, we recommend that the Natural Resources Ministry:

- *assess the human resources needed to complete the community-based land-use plans; and*
- *allocate such resources.*

Status: Fully implemented.

Details

In our 2020 audit, we found that no branch or staff in the Natural Resources Ministry was specifically tasked with expanding the province's protected area network. As a result, identifying sites for protection and completing the process to create protected areas were not prioritized. Moreover, we found that the number of full-time-equivalent staff assigned to work on land-use planning in the Far North region, which involves the creation of protected areas, decreased from 22 in 2018 to 10 at the time of our audit. At the time of our audit, we found that only four land-use plans had been approved under the *Far North Act, 2010*, covering a total of three million hectares, or 6.7%, of this region. Ten other community-based land-use plans were in various stages of development

In our follow-up, we found that there are now eight full-time staff working on land-use planning in the Far North. We found that the Natural Resources Ministry had assessed the numbers of staff to complete community-based land-use planning in the Far North that is currently under way. The Ministry informed our Office that staffing is a moving target and it will continue to routinely assess human resource requirements needed to meet planning demands.

Recommendation 4

So that the Ministry of the Environment, Conservation and Parks (Environment Ministry) can meet its legislative responsibility under the Provincial Parks and Conservation Reserves Act, 2006 to maintain viable and healthy populations of native species, including species at risk, we recommend that the Environment Ministry:

- *develop a monitoring program to regularly collect information about the types and populations of species at risk and their habitat in each provincial park and conservation reserve;*
- *implement the monitoring program;*

Status: In the process of being implemented by March 2025.

Details

In our 2020 audit, we found that the Environment Ministry does not centrally collect information on how many and what kinds of species at risk are found in each provincial park or conservation reserve—or the state of their habitats. The *Provincial Parks and Conservation Reserves Act, 2006* requires the Environment Ministry to maintain healthy and viable populations of at-risk species and their habitat within provincial parks and conservation reserves. The Act also directs that these protected areas are to provide points of reference to support monitoring of ecological change on the broader landscape. We found that there are at least 181 types of species at risk in provincial parks and conservation reserves.

In our follow-up, we found that the Environment Ministry prepared an Ontario Parks Science Strategy in

February 2023 to guide how Ontario Parks generates, acquires, manages, and uses science, knowledge, data and information. This includes identifying and implementing opportunities to use consistent monitoring, inventory, and data management protocols where feasible. In response to priority actions in the strategy, the Ministry has initiated a project to evaluate all inventory and monitoring activities conducted by Ontario Parks, including for species at risk, to identify opportunities for adopting standard protocols. The Ministry expects this work to be completed by March 2025, with additional work required to develop or adopt standard protocols for identified priorities. Inventory and monitoring programs are ongoing within provincial parks, especially in southern and central Ontario where species at risk are more prevalent, there is higher visitor use and more staff are present. The Ministry told us that it is in the process of introducing a range of measures (including a new data-collection application and a species occurrence database) to improve species inventorying and monitoring throughout the province, including species at risk. Collectively, these measures are intended to improve species data collection and better inform management decisions.

In 2021, the Ministry estimated that 4,539 days in staff time were spent on species at risk activities, with estimated spending of \$1.32 million for species at risk management. The Ministry informed our Office that Ontario Parks dedicated \$1.4 million of its operating budget in 2022/23 to maintaining and improving ecological integrity throughout Ontario's provincial parks and conservation reserves system, including enhancing the protection and restoration of species at risk populations.

- *publicly report, as part of the State of Ontario's Protected Areas Report, on the status of species at risk and their habitats in provincial parks and conservation reserves based on the results of its monitoring program.*

Status: In the process of being implemented by 2031/32.

Details

The *Provincial Parks and Conservation Reserves Act, 2006* requires the Environment Ministry to report on the state of the province's protected areas every 10 years. In February 2022, the Environment Ministry released its 2021 State of Ontario's Protected Areas Report, publishing 16 indicator reports by theme using available scientific data, including a report on species at risk in provincial parks and conservation reserves. In our follow-up, the Ministry informed our Office that it will rely on its forthcoming Ontario Parks Science Strategy to implement improved data collection and management processes and better inform update reports by 2031/32, in accordance with its legislative obligation. The Act directs that the next State of Ontario's Protected Areas Report will be released by 2032.

Recommendation 5

So that the Ministry of the Environment, Conservation and Parks (Environment Ministry) can meet its legislative responsibility under the Provincial Parks and Conservation Reserves Act, 2006 to maintain viable and healthy populations of native species in provincial parks and conservation reserves, we recommend that the Environment Ministry:

- *collect information about the extent and type of invasive species by provincial park and conservation reserve;*

Status: In the process of being implemented by March 2025.

Details

In our 2020 audit, we found that the Environment Ministry does not systematically monitor the presence or abundance of invasive species in provincial parks and conservation reserves. Invasive species are plants and animals that enter a new environment where they are not native, and have significant negative impacts on native species and habitats. We found in our review of the management plans for a sample of provincial parks

and conservation reserves across the province that one-third of the plans did not outline actions to identify, prevent and manage invasive species. We also visited a sample of 27 provincial parks and found, through our own observations, research, and discussions with park staff, that invasive species were present in 25 of them.

In our follow-up, we found that the Environment Ministry developed an Ontario Parks Science Strategy in February 2023 to identify and implement opportunities to use consistent monitoring, inventory, and data management protocols where feasible, including for invasive species. In response to goals and priorities identified in the strategy, the Ministry has initiated a project to evaluate all inventory and monitoring activities conducted by Ontario Parks, including for invasive species, to identify opportunities for adopting standard protocols. The Ministry expects this work to be completed by March 2025, with additional work required to develop or adopt standard protocols for identified priorities.

The Ministry informed our Office that, given the general increase in new species invasions in recent years, it has increased the quantity of staff time and expenditures spent addressing invasive species in provincial parks and conservation reserves. In 2021, the Ministry estimated that 1,465 days in staff time were spent monitoring and mitigating invasive species, with estimated spending of \$387,000.

The Ministry is piloting a data collection application in Ontario Parks' southern zones to help identify and track occurrences of invasive species and management actions undertaken within provincial parks and conservation reserves. The Ministry is exploring the development of a database to house invasive species data captured through iNaturalist (a mobile app that helps users identify and report plants and animals) and to promote the use of iNaturalist more broadly by provincial park and conservation reserve visitors. These measures are intended to improve invasive species data collection and monitoring on a park-by-park basis in

order to better inform management decisions. Timelines for completion of this project are to be determined.

- *assess the impacts of invasive species in individual provincial parks and conservation reserves;*
- *take the necessary actions, where feasible, to reduce or eliminate invasive species and their negative impacts in provincial parks and conservation reserves.*

Status: Little or no progress.

Details

In our 2020 audit, we also found that the Environment Ministry does not systematically monitor the impacts of invasive species on native species in provincial parks and conservation reserves. We found in our review of the management plans for a sample of provincial parks and conservation reserves across the province that one-third of the plans did not outline actions to identify, prevent and manage invasive species.

In our follow-up, we found that the Ministry has not assessed the impacts of invasive species in each provincial park and conservation reserve and has no plans to do so, given resource constraints. Using its existing resources, the Ministry takes a risk-based approach to assessing and mitigating the impacts of invasive species within provincial parks and conservation reserves by focusing on protected areas vulnerable to invasive species habitation and spread. For example, the Ministry generally focuses on protected areas in southern zones, along invasive species pathways, with higher levels of public use. The Environment Ministry informed our Office that it expects that new tools and measures, such as those under the Ontario Parks Science Strategy and data collection via iNaturalist, will help assess and mitigate invasive species in provincial parks and conservation reserves throughout the protected areas system.

Recommendation 6

So that hunting, fishing, trapping and other activities in provincial parks and conservation reserves are ecologically sustainable, we recommend that the Ministry of the Environment, Conservation and Parks:

- *work with the Ministry of Natural Resources and Forestry to gather information about the extent of hunting, fishing and trapping activities in each provincial park and conservation reserve;*
- *assess the ecological impacts of such activities in provincial parks and conservation reserves; and*
- *take necessary actions to mitigate any negative ecological impacts of the activities.*

Status: Will not be implemented.

The Office of the Auditor General of Ontario continues to support the implementation of this recommendation.

Details

In our 2020 audit, we found that the Environment Ministry does not assess whether hunting, fishing and trapping activities in provincial parks and conservation reserves are ecologically sustainable. These activities can negatively impact species and how effectively these sites function as protected areas. The *Provincial Parks and Conservation Reserves Act, 2006* requires that these activities, which are allowed in most of Ontario's 630 provincial parks and conservation reserves, be carried out in a manner that will maintain healthy and viable populations of native species.

In our follow-up, we found that the Environment Ministry has not gathered information about the extent of hunting, fishing and trapping in each provincial park and conservation reserve. Additionally, the Environment Ministry has not assessed the ecological impacts of hunting, fishing and trapping in provincial parks and conservation reserves. Further, the Environment Ministry will not be implementing these recommended actions.

The Environment Ministry informed our Office that it is the responsibility of the Natural Resources Ministry to administer and monitor impacts and set policies for hunting, fishing and trapping in Ontario. Given

the expansive distribution and species range of game animals, the Natural Resources Ministry conducts these activities on the basis of broad landscape units (which are generally much larger in scale than most provincial parks and conservation reserves). The Environment Ministry noted that it will continue to support the Natural Resources Ministry's efforts to gather and utilize information collected regarding wildlife harvesting in provincial parks and conservation reserves. Where appropriate, the Environment Ministry will use these data to inform park management decisions and mitigate negative ecological impacts.

The Environment Ministry informed our Office that information on ecological impacts is gathered during life science inventories and other investigations. These efforts may reflect the negative ecological impacts associated with hunting, fishing and trapping in provincial parks and conservation reserves. For example, the Natural Resources Ministry's Broad-Scale (Fisheries) Monitoring Program assesses fish populations in a sample of lakes across Ontario including in provincial parks and conservation reserves. Both ministries work together to conduct recreational fishing surveys, and periodically conduct angler surveys on fish harvests in larger parks such as Algonquin and Quetico Provincial Parks.

Recommendation 7

So that the wilderness areas in Ontario are maintained in their natural state as required under the Wilderness Areas Act, and so that activities that are not permitted do not occur, we recommend that the Ministry of Natural Resources and Forestry improve its processes for managing wilderness areas.

Status: Fully implemented.

Details

In our 2020 audit, we found three of Ontario's 11 wilderness areas that remain on Crown land outside of other protected areas were open to logging or mining activities. This is inconsistent with the requirements of the *Wilderness Areas Act* that wilderness areas be protected in their natural state. We found that the surface and mining rights for Sankey Township Nature Reserve Wilderness

Area were not withdrawn from prospecting, mining claim registration, sale and lease. Additionally, we found that Derby Lake and Eighteen Mile Island Wilderness Area were open to commercial logging.

We also found that the Natural Resources Ministry does not have any policy requiring staff to monitor wilderness areas. In addition, a 2016 report by the Natural Resources Ministry noted that six of Ontario's 11 wilderness areas had been variously impacted between 1960 and 1997 by one or a combination of logging, logging roads or gravel pits. These past activities indicate that these areas have historically not been protected by the Natural Resources Ministry as required by law. For example, Eighteen Mile Island Wilderness Area, which was in "pristine condition" when it was created in 1960, was then logged from 1960 to 1970, yet Ministry staff have stated that "no effort has been expended to ensure the integrity of the area."

In our follow-up, we found that in April 2022, the surface and mining rights for Sankey Township Nature Reserve Wilderness Area were withdrawn from prospecting, mining claim registration, sale and lease. In June 2022, the policy reports for Derby Lake and Eighteen Mile Island Wilderness Areas were amended to confirm that commercial logging is not permitted. Further, the policy reports for all the wilderness areas in question, which are available to the public, were also amended to provide clarity and transparency on the listed prohibited activities and land uses within *Wilderness Areas Act* sites. In addition, in 2023, a memo was sent to various parts of the Ministry that are responsible for approvals and compliance/enforcement activities to ensure staff awareness of the prohibitions within wilderness areas.

While the Natural Resources Ministry has not developed a policy requiring staff to monitor or inspect wilderness areas, monitoring and inspection of wilderness areas will be carried out on a case-by-case basis where there is an identified need. The Natural Resources Ministry noted that forestry, aggregate extraction, and other intrusive activities on Ontario's public lands are regulated by the Ministry under various frameworks, and staff actively monitor these industries,

including to ensure they are not encroaching into restricted areas, like wilderness areas. Further, the Ministry noted that mineral exploration and development is regulated by the Ministry of Mines under the *Mining Act*, and that no wilderness areas are open to staking under the Act and there are no active claims in these areas. Monitoring and inspecting wilderness areas, some with a history of prohibited activities, is important to prevent prohibited activities from occurring.

Recommendation 8

To enhance ecological integrity in Algonquin Provincial Park by treating more of it as a protected area, we recommend that the Ministry of the Environment, Conservation and Parks in consultation with the Ministry of Natural Resources and Forestry:

- *review the impact of the current level of commercial logging in Algonquin Provincial Park on the ecological integrity of the Park; and*
- *amend the Algonquin Park Management Plan to implement the results of this review.*

Status: Will not be implemented.

The Office of the Auditor General of Ontario continues to support the implementation of this recommendation.

Details

In our 2020 audit, we found that although Algonquin Provincial Park, at 763,000 hectares, is one of the largest provincial parks in Ontario, only one-third of the park is reported as a protected area by the Environment Ministry. This is because commercial logging is permitted in the park's "recreation/utilization" zone, which covers 498,785 hectares, or two-thirds of the park. National criteria do not allow an area to be reported as a protected area if activities that are incompatible with the conservation of biodiversity—like commercial logging—are allowed to occur. We found that, if all of Algonquin Provincial Park met the criteria for protected areas, it would increase the percentage of Ontario's total protected areas by about 0.5%. Algonquin is the only provincial park in

Ontario where commercial logging is still permitted. Public debate about whether Algonquin Provincial Park should be open to commercial logging has been ongoing for decades.

In our follow-up, we found that the Environment Ministry has not reviewed the impact of the current level of commercial logging in Algonquin Provincial Park in order to treat more lands within the park as a protected area (in which commercial logging would not be allowed) and does not intend to implement this recommendation. The Environment Ministry informed our Office that it has no plans to update the commercial forest management policies in the Algonquin Park Management Plan—which governs how the lands in the park are managed—and a date for a full examination of the park’s management plan had not been set. In 2021, with the Environment Ministry’s endorsement, the Natural Resources Ministry approved the 2021–2031 Algonquin Park Forest Management Plan, directing how commercial logging will be undertaken in the “recreation/utilization” zone of the park. The Environment Ministry informed our Office that, throughout the forest management planning process, it prioritized the protection of park values, particularly ecological integrity. The Environment Ministry has stated that it is satisfied that key ecological and heritage values throughout the park—such as brook trout habitat, species at risk habitat, and unique and sensitive ecological communities—are protected from negative impacts associated with logging through various tools included within the forest management plan.

Outdated and Lack of Management Plans Impede Ministry’s Legal Duty to Conserve Biodiversity

Recommendation 9

So that the Ministry of the Environment, Conservation and Parks (Environment Ministry) complies with its legislative responsibility under the Provincial Parks and

Conservation Reserves Act, 2006 we recommend that the Environment Ministry:

- *develop a strategy to have up-to-date management plans in place for regulated provincial parks and conservation reserves; and*
- *implement the strategy.*

Status: Little or no progress.

Details

In our 2020 audit, we found that the Environment Ministry has not replaced 78, or 86%, of the 91 management plans that it had determined needed to be replaced within the required time frame. Once the Ministry determines that a plan needs to be replaced, its guidelines state that replacement plans should be approved within three to five years, depending on their complexity. By not replacing these plans in a timely manner, provincial parks and conservation reserves may not be effectively addressing threats to the natural features of the parks or reflect the objective of making ecological integrity the top priority.

Our Office also found that the Environment Ministry has not examined the plans for 17 provincial parks that have been in place for over 20 years, as required by the *Provincial Parks and Conservation Reserves Act, 2006*. Additionally, we found that the Environment Ministry did not have management plans for nine provincial parks and three conservation reserves, despite the requirement for plans.

In our follow-up, the Environment Ministry informed our Office that it was brainstorming ideas and planned to complete a draft Ontario Parks Planning Efficiency Strategy as early as March 2024, to improve planning efficiency and outputs to address outdated management plans for provincial parks and conservation reserves. In the interim, the Ministry has implemented a planning-prioritization model to ensure that existing Ontario Parks planning capacity is directed toward priority projects.

Creating More Protected Areas Not a Provincial Priority

Recommendation 10

To help achieve the objective of the Provincial Parks and Conservation Reserves Act, 2006 to permanently protect a network of provincial parks and conservation reserves, we recommend that the Ministry of the Environment, Conservation and Parks work with the Ministry of Natural Resources and Forestry to:

- establish a long-term area-based target for expanding its protected areas with associated timelines;
- develop a long-term strategy that outlines specific actions the ministries will take to achieve its targets;
- implement the plan; and
- publicly report on their progress toward this strategy as part of an annual report to be accountable.

Status: Little or no progress.

Details

In our 2020 audit, we found that, at the last year progress was reported on (2011), the Province was not meeting most of its targets to protect nature in provincial parks. The targets were first set in 1978 and have been only slightly modified since then to incorporate newly available information on Ontario's natural areas. We found that the Environment Ministry had not developed a plan to expand the network of protected areas across Ontario to meet these targets. Environment Ministry staff had internally described the Ministry's current approach as "ad-hoc."

We found that there was no province-wide target for how much of Ontario's area the Province should aim to protect. In our 2020 audit, we found that 10.7% of Ontario was within protected areas. Our Office found that most other provinces and territories have adopted long-term, area-based targets to expand their protected area systems.

In our follow-up, we found that the Ministry has not established a long-term area-based target, with associated timelines, for expanding its protected areas. Additionally, the Ministry has not developed a long-term strategy that outlines specific actions to achieve its targets.

In 2021, the Ministry established a Protected Areas Working Group to identify opportunities to protect and conserve more natural areas. The Protected Areas Working Group shared ideas and recommendations with the Environment Ministry to support the development of targets and a future provincial strategy. The Environment Ministry states that it continues to consider ideas and opportunities proposed by the Protected Areas Working Group, which may inform future protected areas initiatives and targets, and a future workplan for protected areas expansion. The Environment Ministry informed our Office that it continues to proceed with various initiatives to expand protected areas in Ontario, for example through the Greenlands Conservation Partnership and the creation of new protected areas at Alfred Bog in eastern Ontario and in Prince Edward County.

Recommendation 11

So that the Ministry of the Environment, Conservation and Parks is making concrete progress toward compliance with the Provincial Parks and Conservation Reserves Act, 2006 by planning a network of protected areas that conserves nature by maintaining Ontario's biodiversity, we recommend that the Environment Ministry:

- assess the financial resources needed to implement the actions described in a long-term strategy to expand protected areas, as described in **Recommendation 10**; and
- allocate such resources.

Status: Little or no progress.

Details

In our 2020 audit, we found that in the previous five years, the Province had added only 3,007 hectares—or 0.003% of Ontario’s land area—to its network of provincial parks, conservation reserves and dedicated protected areas. We found that, in 2019, the Environment Ministry proposed protecting 197,835 hectares of Crown land as new provincial parks and conservation reserves or additions to existing ones. However, the Environment Ministry did not proceed with protecting these sites because it lacked the necessary staff and funding. The Environment Ministry estimated that it would need a team of up to 23 full-time-equivalent staff per year over a four-year period to complete the process of formally protecting these sites.

We also found that the Environment Ministry’s budget for land acquisition was \$1,000 per year. Such funding is used to purchase privately owned properties, as well as for administrative costs such as legal fees and land surveying costs. In 2018, the Ontario budget contained a \$15 million commitment over three years to preserve natural heritage, but this budget item was not implemented.

In our follow-up, we found that the Environment Ministry has not developed a long-term strategy that outlines specific actions to achieve its targets to protect Ontario’s biodiversity (see our follow-up on **Recommendation 10** above). Accordingly, it cannot assess the financial resources needed to implement actions until one is developed. The Environment Ministry informed our Office that it allocates existing staff resources on a project-by-project basis, in alignment with government priorities, to expand protected areas. The Ministry indicated that in 2021/22, 2022/23 and 2023/24, it prioritized the level of staff dedicated to expanding protected areas in accordance with budgetary and staffing limits, and will continue to do so on an annual basis.

In 2020, after our audit was completed, the Environment Ministry established the Greenlands Conservation Partnership to expand privately protected areas in southern Ontario. This partnership provides \$20 million over four years, ending in 2024, for land

trusts to secure and manage new privately protected areas. Additionally, the 2022 Ontario Budget included a commitment of \$4 million to support securement of ecologically important lands in central Ontario by land trusts, and the 2023 Ontario Budget committed an additional \$14 million investment in the Greenlands Conservation Partnership.

Recommendation 12

*To meet its legislative responsibility under the Provincial Parks and Conservation Reserves Act, 2006 to permanently protect ecosystems that are representative of all of Ontario’s natural regions, we recommend that the Ministry of the Environment, Conservation and Parks, in developing its long-term protected area strategy in **Recommendation 10**, include actions specifically targeted toward increasing protected area coverage in southern Ontario such as establishing partnerships with conservation organizations that can assist in establishing and managing protected areas and restoring degraded habitats.*

Status: Little or no progress.

Details

In our 2020 audit, we found that southern Ontario is the most biologically diverse part of Canada but its biodiversity is among the most at risk because it is widely developed. We found that provincial parks and conservation reserves covered 60,848 hectares, or only 0.4% of this part of Ontario. Including protected areas managed by Parks Canada and others, the protected area coverage increases to only 0.6%, or 78,707 hectares. For example, we found that there were only four operating provincial parks with campgrounds and six non-operating provincial parks with hiking trails located within 100 kilometres of the City of Toronto, despite the high demand for recreation.

In our follow-up, we found that the Environment Ministry has not developed a long-term protected area strategy that includes actions specifically targeted toward increasing protected area coverage in southern Ontario (see our follow-up on **Recommendation 10** above).

The Environment Ministry indicated that it has made significant progress in developing partnerships with conservation organizations to expand protected areas in southern Ontario in recent years. The Ministry has established the Greenlands Conservation Partnership to expand privately protected areas in southern Ontario. This partnership provides \$20 million over four years, ending in 2024, for land trusts to secure and manage new privately protected areas. Between January 2021 and April 2022, 36 properties and 99,045 hectares were secured by partner organizations. The 2022 Ontario Budget also included a commitment of \$4 million to support securement of ecologically important lands in central Ontario by land trusts, and the 2023 Ontario Budget committed an additional \$14 million investment in the Greenlands Conservation Partnership.

The Environment Ministry also noted that it had increased protected area coverage in southern Ontario through the creation of new provincial protected areas in 2023, including Monarch Point Conservation Reserve in Prince Edward County and Alfred Bog Provincial Park, east of Ottawa.

Recommendation 13

To meet its legislative responsibility under the Provincial Parks and Conservation Reserves Act, 2006 to permanently protect ecosystems that are representative of all of Ontario's natural regions, we recommend that the Ministry of the Environment, Conservation and Parks, in developing its long-term protected area plan in Recommendation 10, use known key biodiversity areas to identify new potential protected areas.

Status: Little or no progress.

Details

In our 2020 audit, we found that the Environment Ministry did not consider known key biodiversity areas to identify new areas to protect. In 2016, the International Union for Conservation of Nature released a global standard to identify key biodiversity areas that should be considered for protection.

In our follow-up, we found that the Environment Ministry has not developed a long-term strategy that will use known key biodiversity areas to identify new potential protected areas (see our follow-up on **Recommendation 10** above). However, the Environment Ministry informed our Office that it will use known key biodiversity areas to inform the establishment of provincial parks and conservation reserves in the future. The Ministry is working with the Wildlife Conservation Society (a non-governmental organization) on an ongoing basis to review potential key biodiversity areas and where they overlap with existing provincial parks and conservation reserves. Additionally, the National Standard for the Identification of Key Biodiversity Areas in Canada is being used across the country, including in Ontario, to identify and assess key biodiversity areas. The Environment Ministry indicated that it receives data and information, as well as expert advice and review, from the Natural Resources Ministry to support the identification and assessment of key biodiversity areas in the province.

Little Progress Made to Work with Indigenous Peoples to Create Protected Areas

Recommendation 14

So that timely decisions are made jointly with First Nations about where to establish protected areas and where to allow development in the Far North, and to comply with the Far North Act, 2010, we recommend that the Ministry of Natural Resources and Forestry work with willing First Nations to complete the community-based land-use plans that are unfinished.

Status: In the process of being implemented.

Details

In our 2020 audit, we found that—10 years after the *Far North Act, 2010* was passed directing the Natural Resources Ministry to work with First Nations to protect 50% of the Far North—only 4.7 million hectares, or 10.4% of the Far North, were protected. We found that

only four land-use plans had been approved, covering a total of three million hectares, or 6.7%, of the Far North. We found that 10 other community-based land-use plans were in various stages of development. Additionally, we found there was no Far North strategy to guide the development of land-use plans, no joint advisory body to provide advice, and transfer payments to First Nations to work on land-use planning had been reduced.

In our follow-up, we found that workplans that support advancing the finalization of land-use plans, and transfer payment agreements to support those workplans, have been completed with willing First Nations (Moose Cree First Nation, Constance Lake First Nation, Marten Falls First Nation and Webequie First Nation). The Ministry noted that, because community-based land-use planning is a joint process, and dates shift over time, an estimated date of completion is unknown at the time of our follow-up.

Recommendation 15

To confirm the Province's position on Indigenous-led protected areas, we recommend that the Ministry of Natural Resources and Forestry:

- *seek the necessary direction regarding the Province's support for the creation of Indigenous Protected and Conserved Areas; and*
- *if direction and approval are obtained, include in its long-term protected area strategy described in Recommendation 10, actions to recognize Indigenous Protected and Conserved Areas.*

Status: Little or no progress.

Details

In our 2020 audit, we found the Natural Resources Ministry had not decided whether it would recognize and support the creation of Indigenous Protected and Conserved Areas, as that direction would need to come from a government plan or an official position taken by the Province. Indigenous Protected and Conserved Areas are lands and waters where Indigenous

governments have the primary role in protecting and conserving ecosystems through Indigenous laws, governance and knowledge systems. We found that, in 2019, six First Nations expressed interest in creating Indigenous Protected and Conserved Areas.

In our follow-up, we found that the Natural Resources Ministry has not sought direction on the Province's position with regard to supporting the creation of Indigenous Protected and Conserved Areas. The Ministry informed our Office that district and operational staff are continuing to hold discussions with interested First Nation communities.

Province Missing Opportunities to Work with Conservation Authorities, Municipalities and Public to Conserve Biodiversity

Recommendation 16

To recognize and encourage work done to conserve biodiversity by conservation authorities, municipalities and others, we recommend that the Ministry of the Environment, Conservation and Parks:

- *implement a public outreach program to further increase awareness among all potential contributors to the accounting of protected areas;*

Status: Will not be implemented.

The Office of the Auditor General of Ontario continues to support the implementation of this recommendation.

Details

In our 2020 audit, we found that the Environment Ministry had inadequately engaged with other entities who undertake conservation efforts in Ontario. Because of this, the Province was missing opportunities to increase the size of its protected area network by not leveraging the work already being done by others. We found that the Environment Ministry had received and screened only 23 municipal or conservation authority properties to determine whether they meet the criteria to be considered as protected areas.

We found that there was no budget for outreach for the purposes of screening third-party lands. In 2017/18, the Ministry allocated and spent \$55,000 on outreach and assisting partners to screen their lands as protected areas. In 2018/19, the Ministry approved \$100,000, but it was not spent due to a freeze on discretionary spending in June 2018. Additionally, the Ministry's website did not have any information to educate interested parties about the screening process to have lands counted as protected areas and encourage them to contribute to the Province's efforts to support biodiversity conservation initiatives. We also found that there was a lack of funding to assist external parties in gathering the necessary information for their submissions such as for land surveying, mapping and gathering biological information about the specific site.

In our follow-up, we found that the Environment Ministry provides in-house staff support for work paid for by the federal government with conservation partners to increase awareness and screen sites. This in-house support is the same type of support as we noted in our 2020 audit. Accordingly, the Ministry has not implemented a new public outreach program to further increase awareness among all potential contributors to the accounting of protected areas. The Environment Ministry informed our Office that it plans to continue participating in pan-Canadian initiatives to increase awareness of accounting and reporting of protected areas.

- *screen site submissions within a defined and reasonable period of time after receipt.*

Status: Fully implemented.

Details

In our 2020 audit, we found that six conservation areas totalling 5,150 hectares that are managed by conservation authorities had been screened and met criteria to be reported as protected areas. However, we found that a total of 545 additional properties owned by conservation authorities, covering more than 150,000 hectares, could be screened and potentially reported as protected areas. Additionally, we also found that 11

environmentally significant areas totalling 839 hectares, all managed by the City of London, had been screened and reported as protected areas. Our research identified other municipalities that manage environmentally significant areas that could have numerous lands screened and potentially reported as protected areas.

In our follow-up, we found that the Environment Ministry has significantly increased the number of sites that it reports as protected areas. In December 2021, the Environment Ministry reported 335 new areas covering 40,498 hectares of municipal, conservation authority and privately owned lands. The Environment Ministry informed our Office that it will screen and report protected areas on an annual basis.

Recommendation 17

So that the Ministry of Natural Resources and Forestry (Natural Resources Ministry) effectively addresses public requests to create recommended protected areas, consistent with its Guide for Crown Land Use Planning, we recommend that the Natural Resources Ministry:

- *centrally track its decisions on external requests for land-use amendments to create recommended provincial parks and conservation reserves;*

Status: Fully implemented.

Details

In our 2020 audit, we found that the Natural Resources Ministry did not know, or centrally track, how many public requests it received to undertake Crown land-use planning to designate a site as a "recommended" provincial park or conservation reserve. Accordingly, the Natural Resources Ministry could not demonstrate that any requests were reviewed in line with its Guide for Crown Land Use Planning. We identified that there had been at least two such requests.

In our follow-up, we found that, in response to our recommendation, the tracking of public requests has been established and will be maintained by regional staff. One public request was received to support the addition of lands to an existing provincial park, one request was to add Crown land to a proposed provincial

park, and one request was to establish a new conservation reserve. The Natural Resources Ministry screened these submissions in accordance with the Guide for Crown Land Use Planning.

- *report annually on its decisions in its yearly published plan and annual report.*

Status: In the process of being implemented by May 2024.

Details

In our 2020 audit, we found that the Natural Resources Ministry did not centrally track external requests to create protected areas. Accordingly, we—and by extension, the public—could not determine how many opportunities the Natural Resources Ministry has chosen to pursue or not to create new protected areas.

In our follow-up, the Natural Resources Ministry initially informed our Office that it and the Environment Ministry had come to an agreement on implementing our recommendation: the Natural Resources Ministry would prepare a stand-alone summary report on external requests for land-use amendments to create recommended provincial parks and conservation reserves and provide this to Environment Ministry at the end of each fiscal year. However, the Environment Ministry subsequently informed our Office that the responsibility to publicly share this information remains with the Natural Resources Ministry. The Natural Resources Ministry has prepared annual summaries (for 2021/22 and 2022/23) of external requests for land use amendments to create provincial parks and conservation reserves, and the subsequent land use amendment decisions. Although the Natural Resources Ministry's 2021/22 and 2022/23 annual reports did not contain this information, the Ministry intends to reference a summary of work achieved in a forthcoming annual report, with an estimated implementation date of May 2024.