



PARKS AND RECREATION ONTARIO

Proposal Response:

Expanding Protected Areas in Ontario – Sites Proposed to be Regulated
under the Provincial Parks and Conservation Reserves Act, 2006

ERO #: 019-8618

Parks and Recreation Ontario Submission
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About Parks and Recreation Ontario

Parks and Recreation Ontario (PRO) is a non-profit association with over 6,500 members that delivers services to more than 85% of Ontario's population. We are devoted to advancing equitable access to quality parks and recreation services for all Ontarians. PRO champions the health, social, and environmental benefits of parks and recreation through evidence-based practices, advocacy, and collaborative cross-sectoral partnerships. Our work includes policy and research, education, training, and professional development opportunities, as well as our flagship quality standards program, HIGH FIVE®, which includes a stream called the *Principles of Healthy Child Development*. We envision a future for Ontario where every person has equitable access to vibrant communities, sustainable environments, and personal health.

Introduction

We are writing to express our support for the *Expanding Protected Areas in Ontario – Sites Proposed to be Regulated under the Provincial Parks and Conservation Reserves Act, 2006* regulation. For over 100 years, Ontario's Provincial Parks and Conservation Reserves have provided Ontarians and out-of-province visitors with access to quality outdoor recreation experiences. The expansion of land under the PPCRA will continue this legacy, protecting ecologically sensitive areas, offering visitors opportunities for learning and environmentally responsible recreation, and providing rich settings for academic research and citizen science.

Acknowledgement & Recommendations

We would like to express our gratitude to the Ministry of Environment, Conservation and Parks, for the expansion of lands protected under the PPCRA. This project strongly aligns with PRO's mandate of advocating for equitable access to parks and recreation for all Ontarians. Currently, the province is working towards building 1.5 million new homes. During this period of significant development, it is vitally important that the province also prioritizes long-term protection and preservation of greenspace, especially those parcels that are ecologically sensitive. In recent years, Ontario Parks experienced a significant increase in visitors. While this trend was [initially prompted by the COVID-19 pandemic](#), visitor attendance [continues to surge](#). At PRO, we value outdoor recreation and its numerous mental and physical health benefits. However, the continued legacy of outdoor recreation in Ontario hinges on the availability of healthy greenspace and [sustainable land management practices](#). In this regard, the inclusion of additional park space in Ontario through this regulation is welcome.

The introduction of this regulation presents an opportunity for Ontario Parks to re-examine and re-establish accreditation requirements for staff, particularly those working with children. This regulation also invites a timely moment for Ontario Parks to foster new relationships with Indigenous communities. The following document provides additional explanation and rationale for these two recommendations.

Implementation of childhood development training

Recommendation:

Require specialized training in healthy child development for Ontario Parks staff who lead programming for children and youth.

As a provincially run institution, Ontario Parks has an obligation to uphold the highest standards of training amongst employees and provide exceptional education and recreation programs. The expansion of lands protected under the PPCRA will likely increase the potential programming capacity of Ontario Parks. Therefore, this new regulation



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presents an exciting opportunity for the Ministry to revisit employment accreditation requirements and pilot new training, particularly related to healthy child development.

Each year, thousands of Ontarians engage in nature-based recreation in Ontario's provincial parks. It is well documented that spending time in nature has a [myriad of holistic health benefits](#) and contributes to feelings of connectedness and [care for the environment](#). For decades, Ontario Parks has enhanced these benefits by delivering educational programming. In particular, [Discovery Programs](#) offer a wide range of child- and youth-centered programming that directly links with Ontario school curricula. However, [recent job postings](#) indicate that training in healthy child development is not a requirement for these roles.

Many municipalities, universities, and organizations across Canada that run programming for children and youth require staff to attain the [HIGH FIVE®](#) certification in [Principles of Healthy Child Development](#). For over two decades, [HIGH FIVE®](#) has been the champion of quality assurance, ensuring that organizations meet the highest standards of excellence. The [Principles of Healthy Child Development](#) training is rooted in extensive research and hands-on experience, providing participants with essential learnings about designing, delivering, and evaluating quality programming.

The expansion of lands protected under the PPCRA brings new possibilities of increased programming capacity potential for Ontario Parks. However, growth in both land base and visitor attendance also carries new challenges, especially concerning quality assurance. To support Ontario Parks during this time of transformation and development, PRO would be pleased to openly dialogue and collaborate with the Ministry regarding organizational synergies. In particular, PRO is eager to discuss the inclusion of the [HIGH FIVE® Principles of Healthy Child Development](#) course as part of training for Naturalists, Discovery Rangers, and other Ontario Park's staff involved in creating and delivering programming for children and youth.

Indigenous co-governance

Recommendation:

Explore opportunities for Indigenous co-governance, co-management, and/or operational agreements at proposed Spanish River Provincial Park expansion.

PRO is a strong supporter of Ontario Parks and creating more accessible and inclusive opportunities for outdoor recreation. However, PRO is also attuned to the contentious history of Canadian park systems, especially concerning their relation to [Indigenous displacement](#). We acknowledge that [Ontario Parks has taken steps towards reconciliation](#), including providing free access to parks for Indigenous peoples wishing to exercise their Aboriginal and treaty rights, and we applaud these initiatives. However, we also recognize that reconciliation is an ongoing journey of relationship building and (un)learning.

The expansion of lands protected under the PPCRA presents a timely moment for Ontario Parks to make strides towards reconciliation. Particularly, PRO identifies the expansion of Spanish River Provincial Park as a possible site to explore models of [co-governance, co-management, and/or operational agreements](#). The proposed expansion of Spanish River Provincial Park is situated over 150km south-west of the park's primary location. This significant separation raises uncertainty surrounding the feasibility of cohesive park planning and management. In contrast, the proposed expansion borders [Sagamok Anishnawbek First Nation](#), and is less than 6km east from [Serpent River First Nation](#). Ontario Parks has seen previous success in operational agreements, such as the



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partnership established between Mississagi Provincial Park, Elliot Lake, Serpent River First Nation, and Mississauga First Nation. Therefore, we encourage Ontario Parks to collaborate with Sagamok Anishinabek First Nation and Serpent River First Nation to explore opportunities for co-governance, co-management, and/or operational agreements.

Conclusion

High quality, accessible outdoor recreation opportunities are integral to the health and well-being of all Ontarians. Provided for the benefit of both individuals and communities, parks and recreation are a public good, in the same ways as education or healthcare. As Ontario Parks grows in both land base and visitor attendance, quality assurance may be increasingly challenging to ensure. By partnering with organizations, like PRO, who have expertise in quality assurance, Ontario Parks can secure their legacy of providing quality outdoor recreation experiences.

The long-term sustainability of parks and outdoor recreation are only made possible through prioritizing ecological integrity, preservation, and effective management practices, especially those informed by Traditional Indigenous Knowledges. For this reason, we applaud the Ministry for prioritizing Indigenous consultation during the reviewal process of this regulation. We encourage that this priority continues to be a central focus of this regulation reviewal, and that the Ministry explore models of co-governance, co-management and/or operational agreements when land expansions are proposed under the PPCRA.

We are pleased to discuss our comments further with the Ministry, should any clarity be required. Thank you for the opportunity to provide comments on this important proposal.

Sincerely,

A handwritten signature in black ink that reads 'S. Ane'.

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A handwritten signature in black ink that reads 'Kim Gavine'.

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