

SUB-REGIONAL PLANNING: RECOMMENDATIONS TO ACHIEVE THE PROVINCIAL
POLICY OUTCOMES FOR THE OUTDOOR RECREATION AND TOURISM ECONOMIES

TECHNICAL SUBMISSION

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EXECUTIVE SUMMARY: SUB-REGIONAL PLANNING FOR THE VISITOR ECONOMY

The Tourism Industry Association of Alberta (TIAA) has prepared this principle-based guidance for the Government of Alberta (GoA) as they continue to consult on Sub-regional Plans (SRPs). While several SRPs have already been completed, their content and direction regarding tourism and outdoor recreation varies substantively across the plans. The purpose of this submission is to outline what TIAA believes SRPs should consistently include and address to support the GoA's and industry's sector goals as outlined in approved provincial policies.

TIAA supports SRPs as a key component of the GoA's approach to maintaining a working landscape and believes they are also critical to the long-term success of Alberta's tourism and outdoor recreation economies (collectively, the visitor economy), and the achievement of established provincial policy objectives for these sectors. The visitor economy is a core part of Alberta's resource-based economy. Just like forestry, agriculture, oil and gas, and other traditional resource-based industries, the economic viability of tourism and outdoor recreation is inextricably linked to secure and dependable access to the resources; the specific features, settings, and incredible Alberta scenery, upon which these sectors are established.

Outdoor Recreation and Tourism

Historically viewed as peripheral to industrial resource development, the Alberta visitor economy now drives significant rural diversification in all regions, supports 1 in 10 Alberta jobs, and generates over \$15.2B in annual receipts. Despite this, a lack of an intentional, coordinated, and whole-of-government approach to outdoor recreation and tourism planning, products and services has perpetuated two ongoing challenges that have been previously identified through [Alberta Crown Land Outdoor Recreation Economy \(2021\)](#) and the TIAA submission for the [Alberta Plan for Parks Engagement \(2024\)](#).

Compression and Economic Leakage

While TIAA recognizes that significant provincial investments in public lands amenities and partnerships have been made by in recent years; recreational associations and commercial operators continue to be limited due a lack of consistent and visible access and regulatory certainty within public lands planning frameworks.

As a result, this lack of statutory certainty has caused investment capital and Alberta visitation to flow to other jurisdictions who are providing products and experiences not available closer to home. This includes a tourism spend leakage of well over \$1 billion to BC alone, by Albertans, every year since 2021.

Provincial Policy Foundations

To date, sub-regional planning has lacked a consistent approach to outdoor recreation and tourism development. Future land-use decisions should directly implement the government's established strategic foundations:

Higher Ground: A Tourism Sector Strategy (2024): Commits to growing the visitor economy to \$25 billion by 2035. Actions include: establish all-season resort development zones, institute clear and commercially viable land use policies, and develop new products and experiences.

All-Season Resorts Policy (2025): The government's commitment to supporting new all-season resorts on Crown lands.

Crown Land Recreation and Conservation Strategy (2026): Recognizes outdoor recreation as an economic driver requiring deliberate investment. Several actions within of the recently approved provincial strategy including enabling diverse recreational opportunities and empowering partnerships require implementation through inclusion in SRPs.

Recommendations Prioritizing Outdoor Recreation and Tourism Opportunities

TIAA, among many others, have long been vocal proponents of elevating both the quality and quantity of outdoor recreation opportunities for quality-of-life, environmental, and economic benefits. Alberta has recently passed through 25+ years where outdoor recreation and tourism was viewed as a low priority, where recreation management occurred without a clear champion, without a cohesive vision, with few plans, limited accountability, limited investment, and often with disjointed efforts. Recent developments are positive, but Alberta is far behind where key competitive north American jurisdictions are and, despite being blessed with so many remarkable outdoor spaces, we are not evolving the way we could be.

TIAA encourages the Alberta government to make a very intentional effort to bridge this gap by positioning itself as an integrated catalyst and facilitator of a diverse suite of high-quality outdoor experiences that invigorates communities, attracts and retains visitors, and stimulates the provincial tourism economy. This will only be possible if SRPs evolve beyond a narrow focus on "managing footprint" toward a modern stewardship model.

- 1. Representation on SRP Task Forces:** Include regional and provincial tourism and outdoor recreation (motorized and non-motorized) representatives on all Sub-Regional Task Forces or Implementation Committees to evaluate land-use trade-offs and socioeconomic impacts.
- 2. Meaningful Outcome Statements:** Establish well-articulated, future-focused outcome statements that mandate sustainable sector growth and clear alignment with provincial policy foundations, replacing passive language focused solely on the "management" of activities.
- 3. Appropriate Use (Statutory Recognition):** Formally recognize outdoor recreation and tourism as permanent, sustainable, and legitimate land uses with statutory standing equal to other traditional resource-based sectors under the *Alberta Land Stewardship Act* (ALSA). The SRP planning process should initiate and support engagement and consultation with affected Indigenous communities and economic development organizations with a goal of ensuring SRPs identify, foster, and support Indigenous tourism development initiatives.
- 4. Appropriate Places (Spatial Designation):** SRPs should clearly identify and designate areas where outdoor recreation and/or tourism are prioritized as the single or priority land use and where management planning will occur.
- 5. Managed Stewardship:** Formalize the role of commercial operators and professional non-profit associations in land stewardship via the *Trails Act*, mandate lost opportunity offsetting for recreational access, and adapt regulations to transition reclaimed industrial sites into recreation destinations.
- 6. Statutory Stability and Investment Certainty:** Establish designated tourism areas within the Regulatory Details Plan of each SRP to provide long-term operational predictability, and, ensure access management policies do not prevent access to these designated zones.
- 7. Implementation:** Mandate capacity requirements ensuring that staff responsible for execution possess specialized expertise in outdoor recreation management and tourism development, supported by transparent, verifiable performance monitoring.

While several SRPs have already been completed, their content and direction regarding tourism and outdoor recreation varies substantively across the plans. The purpose of this submission is to outline what TIAA believes SRPs should consistently include and address to support the GoA's and industry's sector goals as outlined in approved provincial policies.

INTRODUCTION

The Tourism Industry Association of Alberta (TIAA) understands that the Government of Alberta (GoA) is preparing to develop Sub-regional Plans (SRPs) for 14 sub-regions across the province.

TIAA supports SRPs as a key component of the GoA's approach to maintaining a working landscape and believes they are also critical to the long-term success of Alberta's tourism and outdoor recreation economies (collectively, the visitor economy), and the achievement of established provincial policy objectives for these sectors.

While SRPs hold strong potential to support and advance provincial policy priorities for the visitor economy, they also have the potential to establish land use policy that prevents or intentionally/unintentionally limits tourism (nature-based, adventure and Indigenous tourism particularly) and outdoor recreation development and operations in areas of high potential for both sectors.

It is essential to recognize that many segments of the tourism and outdoor recreation sectors are part of the province's resource-based economy. Just like forestry, oil and gas and other traditional resource-based industries, the viability of the tourism and outdoor recreation sectors are inextricably linked to secure and dependable access to the tourism and outdoor recreation resources (features, settings, scenery) on which these sectors are established.

SRPs are a fundamental opportunity to establish land use policy that prioritizes the protection, development and management of tourism and outdoor resources for the benefit of business and employees within these sectors, gateway communities, and Alberta's provincial economy. As such, sub-regional planning must be undertaken carefully to avoid introducing policy that creates unnecessary barriers to these sectors or the loss of areas of high tourism and outdoor recreation potential.

SRPs must evolve beyond a narrow focus on "managing footprint" toward a modern stewardship model that provides the policy framework, statutory certainty, and regulatory clarity needed to attract tourism and outdoor recreation investment.

Plans should enable the achievement of the GoA's established policy priorities for these sectors, while integrating them with conservation, Indigenous traditional land use, and resource development priorities. Done correctly, outdoor recreation and tourism objectives can be positioned at the intersection of ecological protection frameworks for wildlife, watersheds and wetlands and the delivery of sustainable and authentic place-based visitor experiences that are aligned with and respectful of Indigenous land use practices.

Alberta's past land use plan policies have largely regarded the tourism and outdoor recreation sectors as peripheral to industrial resource development and conservation priorities; but, the economic reality presents a different story. Tourism is a sector that has out-performed many other land-reliant sectors, driving rural diversification, supporting more than 1 out of every 10 jobs in the province and driving \$15.2 billion in receipts for Alberta businesses. Despite this, a lack of an intentional, coordinated, and whole-of-government approach to outdoor recreation and tourism planning, products and services has perpetuated two ongoing challenges that have been previously identified through [Alberta Crown Land Outdoor Recreation Economy](#) (2021) and TIAA's submission for the [Alberta Plan for Parks Engagement](#) (2024).

Moreover, provincial outdoor recreation associations - representing tens of thousands of hikers, paddlers, equestrians, cyclists and motorized users - support and maintain Crown land trail and recreation infrastructure networks valued in the hundreds of millions of dollars, principally through volunteer labour. It is of the utmost importance to acknowledge that this represents a significant operational subsidy

(benefit) to the Crown and reinforces both the public's interest and incredible passion for maintaining these landscapes for a variety of purposes.

While several SRPs have already been completed, their content and direction regarding tourism and outdoor recreation varies substantively across the plans. The purpose of this submission is to outline what TIAA believes SRPs should consistently include and address to support the GoA's and industry's sector goals as outlined in approved provincial policies. Although TIAA will participate as needed in individual SRP planning processes, we strongly believe these processes should be undertaken in a consistent manner and deliver clear, aligned policy direction and outcomes for both sectors. We encourage the Land Use Secretariat to ensure each SRP consistently addresses the recommendations provided below.

PROVINCIAL POLICY FOUNDATIONS

Higher Ground: A Tourism Sector Strategy

Higher Ground: A Tourism Sector Strategy was endorsed by the GoA in February 2024. The strategy recognizes that tourism is a major economic driver in Alberta's diversifying economy. Through this framework, the GoA has committed to grow Alberta's visitor economy to *\$25 billion by 2035*.

To be successful, several actions identified within Pillar 2 of the strategy must be addressed through SRPs:

Action 1:

- Establish all-season resort development zones and expand current seasonal recreation areas to all-season resorts.

Action 2:

- Institute clear and commercially viable land use policies.

Action 3:

- Develop new (tourism) products and experiences.

All-Season Resorts Policy

Alberta's *All-Season Resorts Policy* was endorsed by the GoA in December 2025. This policy signals the GoA's commitment to supporting the development of new all-season resorts on Crown lands. Most relevant to SRPs, the policy, together with the *All-Season Resorts Act*, enables the designation of All-Season Resort Areas and directs that all-season resorts must align with plans developed under ALSA as well as other applicable land use policies and plans.

Crown Land Recreation and Conservation Strategy

Crown Land Recreation and Conservation Strategy was endorsed by the GoA in January 2026. The policy recognizes that "Crown lands play an important role in supporting outdoor recreation, which is an economic driver in Alberta's diversifying economy. Alberta's government will continue to support responsible recreational development... as well as opportunities for deliberate investment and strategic growth".

Several actions within Objective 1 of the strategy must be addressed through SRPs:

Action 1:

- Maintain and upgrade Crown land campsites, staging areas, and trails to provide sustainable recreational opportunities in appropriate locations.
- Actively plan for growing demand and diverse users.
- Look at opportunities to reduce human impact by using or converting previously disturbed areas, such as former industrial areas, for recreational activities.
- Explore opportunities for developing water-based recreational strategies for high-priority areas within Alberta, such as the Bow River, Milk River, Red Deer River, Athabasca River, Peace River, Kananaskis River, and the North Saskatchewan River.

Action 2:

- Support the development of recreational facilities that access Crown land from areas identified in the Tourism Development Zones and the All-Seasons Resorts Act.
- Explore opportunities to develop world-class signature routes with enhanced amenities and itineraries, supporting increased accessibility, easier product marketability, and effective management of human impacts.

Action 3:

- Maintain and develop recreational use opportunities on Crown land based on location, activity type, timing of use, and conservation objectives.
- Incorporate recreation planning into all levels of land management planning.

RECOMMENDATIONS

TIAA, among others, have long been vocal proponents of elevating both the quality and quantity of outdoor recreation opportunities for quality-of-life, environmental, and economic benefits. Alberta has recently passed through 25+ years where outdoor recreation and tourism was viewed as a low priority, where recreation management occurred without a clear champion, without a cohesive vision, with few plans, limited accountability, limited investment, and often with disjointed (and sometimes counterproductive) efforts. Recent developments are positive, but Alberta is far behind where some key competitive north American jurisdictions are and, despite being blessed with so many remarkable outdoor spaces, we are not evolving the way we could be.

TIAA encourages the Alberta government to make a very intentional effort to bridge this gap by positioning itself as an integrated catalyst and facilitator of a diverse suite of high-quality outdoor experiences that invigorates communities, attracts and retains visitors, and stimulates the provincial tourism economy. This will only be possible if SRPs evolve beyond a narrow focus on "managing footprint" toward a modern stewardship model.

The following recommendations have been prepared following a review of previous SRPs including the Upper Smoky SRP, Cold Lake SRP, the draft South Athabasca SRP, and Ghost-Kananaskis SRP engagement fact sheet. These recommendations are intended to resolve gaps and inconsistencies in past SRPs and apply across all Crown lands (e.g. Public Lands and Provincial Parks and Protected Areas).

1. REPRESENTATION ON SRP TASK FORCES

The LUS should mandate permanent tourism and outdoor recreation representation on all Sub-Regional Task Forces or Implementation Committees to evaluate relevant land-use trade-offs, social and economic impacts much faster. Ensure representation includes both regional or provincial tourism interests and motorized and non-motorized outdoor recreation interests.

2. MEANINGFUL OUTCOME STATEMENTS

Establish meaningful, well-articulated, regionally appropriate, and future focused outcomes for both the tourism and outdoor recreation sectors in each SRP. Outcome statements should reflect the outcomes and objectives established in provincial policy for each sector as outlined above and incorporate / address outcomes established in the relevant Tourism Development Zone plans prepared by Travel Alberta and local stakeholders.

Separate outcome statements should be provided for outdoor recreation and tourism. Both should better articulate the future state of these sectors including the desire to see sustainable growth in both sectors as well as the types of tourism experiences and outdoor recreation opportunities that will be provided, enhanced and/or developed in each region.

Draft outcomes such as those in the draft Ghost-Kananaskis SRP engagement fact sheet or Upper Smoky SRP (e.g. “recreation and tourism opportunities are sustainable and sufficient”) are inadequate and largely focused on the “management” of the activities rather than articulating a desired future state for each sector.

3. APPROPRIATE USE (STATUTORY RECOGNITION)

Formally recognize outdoor recreation and tourism as permanent, sustainable, and legitimate land uses and establish land use zones that provide policy priority and statutory standing for outdoor recreation and tourism that is equal to other resource-based sectors under the Alberta Land Stewardship Act (ALSA).

SRPs should explicitly incorporate and prioritize tourism and outdoor recreation and should acknowledge that well-planned and proactively managed visitor use on public lands, parks, and protected areas can help balance economic diversification, quality of life benefits, environmental protection, and long-term conservation outcomes.

Provincial and Sector Policy Alignment and Statutory Use

- SRPs should be drafted in a way that they support the implementation of policy priorities and directions in the *Crown Land Vision*, *Crown Land Recreation and Conservation Strategy*, the *Higher Ground Tourism Strategy* and development priorities established in *Travel Alberta’s Destination Development Plans* for each Tourism Development Zone.
- They should clearly define outdoor recreation and tourism sectors as long-term priority land uses and economic sectors for each region, not just land uses “to be managed”.

Tourism Sector Strategy and Competitive Products

- By identifying where outdoor recreation and tourism are priority and permitted land uses, SRPs should establish supportive land management direction that reduces red tape, expedites land use decisions, and increase investor confidence in investing in tourism and outdoor recreation infrastructure. This will help to incentivize and increase private investment in world-class, year-round tourism experiences, creating sustainable economic opportunities and increasing tourism and outdoor recreation revenues across the province.

Collaborative Partnerships with Indigenous Communities

- The SRP planning process should initiate and support engagement and consultation with affected Indigenous communities and economic development organizations with a goal of ensuring SRPs identify, foster, and support Indigenous tourism development initiatives.

4. APPROPRIATE PLACES (SPATIAL DESIGNATIONS)

SRPs should clearly identify and designate areas where outdoor recreation and/or tourism are prioritized as the single or priority land use and where trail management planning will occur. These areas should be selected based on the presence of high-value recreation and tourism resource, such as natural features, settings, and scenic qualities, and their proximity to Alberta's growing populations and areas on unmet outdoor recreation and tourism demand. Consideration should also be given to enabling characteristics, including access to transportation networks, workforce availability, and proximity to gateway communities.

Clearly defining these areas will provide clarity on where and when commercial tourism developments and outdoor recreation activities can occur. This will help focus investment, support coordinated planning and management, reduce red tape, expedite land use decisions, increase investor and partner confidence, and ensure that tourism and outdoor recreation opportunities are developed in locations best suited to sustain high-quality experiences and long-term sector growth. Other land uses within these areas must be managed to ensure the area's outdoor recreation and/or tourism potential and quality are not adversely affected.

All-Season Resort Interest Areas

- In keeping with the All-Season Resorts Policy, SRPs should spatially delineate areas of interest for All-Season Resort Area designation. Doing so will identify where more intensive resort developments that exclusive access to lands will be considered for development subject to further analysis through the All-Season Resorts Policy process. SRPs should broadly signal the type of tourism development envisioned in each interest area. Land use within these areas must be approved and managed in a way that avoids adverse impacts to the areas' tourism potential.
- If identifying All-Season Resort Areas is not possible at the time of sub-regional planning, SRPs should, at minimum, specify that all-season resort areas are supported in the region and that future All-Season Resort Areas may be identified in keeping with the All-Season Resorts Act and associated policy.

Recreation and Tourism Management Areas

- In keeping with the precedents established in the Lower Athabasca Regional Plan, Upper Smoky SRP and Cold Lake SRP, SRPs should continue to spatially identify "Recreation and Tourism Management Areas" where outdoor recreation and/or tourism are the priority land use. SRPs should define the types of outdoor recreation and/or tourism experiences envisioned within each area.
- While other land uses should be permitted in these areas, those land uses must be actively managed in a way that avoids negative impacts on outdoor recreation and tourism resources, the visitor experience and/or commercial tourism operations. SRPs should direct that recreation and tourism development and management plans be prepared to guide the future development of the identified area.

Trail Planning Areas

- As established in the South Athabasca SRP, SRPs should continue to identify trail planning areas where the development, enhancement and designation of land and water-based, motorized and non-motorized regional trail networks and associated visitor amenities (e.g. staging areas, water access points, toilets, etc.) will be developed, enhanced and designated under the *Alberta Trails Act*. Trail Management Plans should be prepared for each identified trail planning areas. SRPs should indicate that land use within trail planning areas will be managed in accordance with the Trails Act to ensure the trail investment are protected.
- SRPs should also indicate if any current or future travel motivating signature trails / routes (e.g. paddling routes, bikepacking route, OHV trails, IMBA Epics) will be developed in the sub-region and any critical connections to adjacent sub-regions.

Extensive Use Tourism Operations

- SRPs should express explicit support for the operation of extensive use guided tourism operations in the sub-region.

5. MANAGED STEWARDSHIP

SRPs should recognize commercial tourism operators and outdoor recreation organizations as essential contributors to Alberta's Crown land-based tourism and recreation economy. Policy direction should support their formal integration as industry partners in planning, stewardship, and delivery, helping to provide high-quality recreation, visitor experiences and attract investment.

At the same time, SRPs should acknowledge that outdoor recreation and tourism can generate adverse effects on ecological values, Indigenous rights and traditional land use, and gateway communities if not carefully planned and actively managed. As such, SRPs should establish clear, high-level direction for visitor use management, including how use will be guided, monitored, and adapted over time to balance sector growth with environmental protection, community well-being, and respect for Indigenous values.

Visitor Use Management

- SRPs should define the direct (and indirect) management actions that will be taken to actively manage visitor use to minimize the adverse impacts of outdoor recreation and tourism visitation on significant ecological (e.g. species at risk) and Indigenous values, and, other land uses in the sub-region.
- Where visitation is intense and management concerns elevated, SRPs should spatially describe / identify and prioritize locations within the sub-region where more focused visitor use management planning or access is desirable to address/resolve current or anticipated visitor use management challenges.
- SRPs should direct that visitor use management plans will be undertaken in accordance with the Visitor Use Management Framework and should acknowledge that well planned and managed outdoor recreation and tourism can help to balance economic diversification, quality of life benefits, environmental protection, and long-term conservation outcomes.
- Ensure all-season resort areas and recreation and tourism management areas in the plan are, or can be, connected by a "primary" road in order to support future tourism or outdoor recreation development.

Designated Trail Managers

- SRPs should continue to leverage the *Trails Act* to advance professional associations and operators into formal management roles and provide adequate long-term financial supports or access to revenue generating mechanisms (i.e. trail sponsorships) to these associations to enable the monitoring and maintenance required by the Crown while supporting a high-quality visitor experience and ensuring environmental compliance.

Lost Opportunity Offsetting

- SRPs should direct that when existing recreational use of Crown lands will be lost/closed due to changes in a land designation (e.g. establishment of a new Provincial Park leads to elimination of motorized recreation opportunities) or disposition (e.g. All-Season Resort Area designation, industrial disposition), those outdoor recreation opportunities will be offset by establishing new opportunities elsewhere in the region. Doing so will help to maintain outdoor recreation capacity within sub-regions.

Reclamation Sites & Concurrent Outdoor Recreation Uses

- SRPs should identify major industrial sites undergoing reclamation that have strong potential to transition into outdoor recreation and/or tourism destinations as an end land use. Where appropriate, regulatory provisions should be adapted to allow recreational use and supporting infrastructure to be introduced prior to the issuance of reclamation certificates, enabling a more efficient and intentional transition.
- SRPs should also encourage the retention and repurposing of suitable industrial infrastructure (e.g. roads and trails) as recreation assets, where safe and appropriate, rather than requiring full removal through standard reclamation processes.

6. STATUTORY STABILITY AND INVESTMENT CERTAINTY

SRPs should create the regulatory and policy clarity necessary to provide reliable and transparent decision-making processes, timely authorizations, and operational predictability needed to support long-term investment in tourism and outdoor recreation assets. This certainty is essential for both commercial operators and outdoor recreation organizations to plan, finance, develop, and manage infrastructure and experiences with confidence.

Regulatory Details Plan

- Similar to Conservation Area regulatory details established in the Upper Smoky SRP, All-Season Resort Areas and Recreation and Tourism Management Areas should be established within the Regulatory Details Plan of each SRP.
- Regulatory details should be drafted to direct the Minister to take whatever steps that in the opinion of the Minister are desirable for achieving the recreation and tourism objectives of each All-Season Resort Area or Recreation and Tourism Areas. This direction is necessary to ensure the outdoor recreation and tourism potential of identified areas is maintained and will continue to deliver, or hold the potential to deliver, world class visitor experiences.

Access Management & Linear Disturbance

- SRPs should ensure that access management and linear disturbance prescriptions do not remove or prevent essential access to All-Season Resort Areas, Recreation and Tourism Management Areas or Trail Planning Areas.
- These limitations should not preclude the development of access where necessary to achieve the tourism or outdoor recreation potential of identified areas.

7. IMPLEMENTATION & PERFORMANCE

SRPs should provide clear implementation direction, performance monitoring to support adaptive management and ensure sufficient capacity to deliver on the plans.

Implementation

- Ensure SRPs provide clear implementation direction, including defined roles, responsibilities, and accountability for delivering outdoor recreation and nature-based tourism initiatives.
- Establish capacity requirements within sub-regional plans to ensure that staff responsible for recreation planning and implementation possess, or have access to, specialized expertise in outdoor recreation management and tourism development. This will support the application of industry best practices and help optimize recreation and tourism outcomes.

Performance Monitoring

- SRPs should establish clear, meaningful performance indicators for outdoor recreation and tourism that are consistently monitored and reported over time.
- These indicators should be supported by transparent, reliable, and verifiable data, enabling regular assessment of whether desired outcomes are being achieved.

DISTRIBUTION

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