



MANITOBA ECO-NETWORK

3rd Floor 303 Portage Ave., Winnipeg MB R3B 2B4
Tel: 204-947-6511 www.mbeconetwork.org

July 6, 2021

Ms. Elise Dagdick
Environmental Approvals Branch
Manitoba Conservation and Climate

Honourable Sarah Guillemard
Minister of Conservation and Climate

Re: Louisiana Pacific Canada Ltd. – Environmental Assessment of 20 Year Forest Management Plan – File: 3893.10

The Manitoba Eco-Network (MbEN) appreciates this opportunity to comment on Louisiana Pacific Ltd.'s *20 year Forest Management Plan*. Since 1988, MbEN has promoted positive environmental action by supporting people and groups in our community. MbEN's programming focuses on policy advocacy, engagement in consultation processes and developing capacity building tools that benefit the environmental non-profit sector and our member groups.

MbEN has engaged with a range of individuals and organizations who have serious concerns about LP's proposed Forest Management Plan and the corresponding regulatory approval process. We urge you to consider the recommendations of concerned citizens and organizations that have identified significant flaws in LP's Environment Act Proposal (EAP) that must be addressed before final approval is granted. Based on the information currently available in the EAP, it is not clear how approval of this Forest Management Plan will help Manitoba achieve its vision of being 'Canada's cleanest, greenest and most climate resilient province' as outlined in Manitoba's Climate and Green Plan. To facilitate meaningful public participation, we also ask that you require a Clean Environment Commission public hearing with participant funding.

We strongly urge your department and the Government of Manitoba to take action and fulfill the legislative objectives recognized in *The Environment Act*, which states:

The aims and objectives of the department are to protect the quality of the environment and environmental health of present and future generations of Manitobans and to provide the opportunity for all citizens to exercise influence over the quality of their living environment.

The Approval Process:

MbEN feels that the approval of Forest Management Plans should follow the same process as other Class 2 developments under *The Environment Act*. Exempting LP's 20 year Forest Management Plan from *The Environment Act* (as per Section 11(2)) through a ministerial agreement, denigrates the process that has been utilized in Manitoba to date and lowers the bar in environmental protection. MbEN was disappointed in the lack of meaningful engagement opportunities offered by the CEC and the Government of Manitoba in relation to the reform of the forest management plan approval process and does not feel that the interests of Manitoba's environmental community were adequately captured. Creating a new process that fast tracks the approval of forestry projects is not in the best interest of all Manitobans and the environment.

LP's Environment Act Proposal:

These are some of the initial problems identified with the information (or lack thereof) provided in LP's Environment Act Proposal, to date. For example:

- More information is needed in the EAP about cumulative effects.
- The monitoring and assessment portion of the EAP also needs to be vastly improved to provide the knowledge necessary for the public to engage in the assessment process effectively. Environment Act License 2191 E was issued to LP in December 1997 for 10 years. There is little information contained in the public registry or EAP that indicate all conditions of this license have been met, considering extensions to the original 10 year plan were renewed in an inconsistent manner since 2006.
- There was selective information provided about the Stakeholders Advisory Committee. When originally established, the Stakeholders Advisory Committee consisted of a robust number of interests and expertise at the table. Given that EA License 2191 E establishes duties and responsibilities for the Stakeholders Advisory Committee, information stemming from this group should be made publicly available and used in the assessment process to develop a new 20 year plan.
- The Government of Manitoba's role and responsibility for the sustainable management of our provincial forest resources must be addressed in this approval process. This should include a commitment to more publicly available data, reliable forest inventories, a new 5 year report on Manitoba Forests, monitoring, assessment and enforcement details, and information that addresses questions about adequate wood supply.

Meaningful Public Participation:

Very little consultation and public outreach has occurred with public interest and environmental organizations such as ours. Given the size and scope of the Forest Management Licence Area (which includes private lands, parks, municipalities, TLE, crown lands, forests,

watersheds, First Nations, etc.) the lack of public information in the monitoring, assessment and enforcement of past and present activities, and the poorly designed cumulative effects assessment model, we ask that the department request the minister to direct the chairperson of the Clean Environment Commission to conduct a public hearing. Historically, the approval of Forest Management Plans has included a robust public hearing. It is in the public interest to ensure this Forest Management Plan receives the same level of public scrutiny and is reviewed by independent experts.

MbEN appreciates your consideration of our comments about the environmental assessment and approval of LP's 20 Year Forest Management Plan and welcomes future opportunities to engage with the Department in the assessment of projects in Manitoba to ensure the highest level of environmental protection measures are required. We are confident you will adhere to the objectives set out in *The Environment Act* and ensure an informed decision can be made.

Sincerely,

Glen Koroluk, Executive Director

Heather M. Fast, B.A., J.D., LL.M., Policy Committee Chair