



# MANITOBA ECO-NETWORK

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**Re: Canadian Kraft Paper Industries Ltd. and Nisokapawino Forestry Management Corp.  
Forest Management Plan - Public Registry File 3094.80**

The Manitoba Eco-Network (MbEN) recommends that the Draft Terms of Reference for Canadian Kraft Paper Industries Ltd. and Nisokapawino Forestry Management Corp.'s Forest Management Plan be amended to require better consideration of potential alternatives, climate impacts, and meaningful engagement opportunities for environmental non-governmental organizations. It is important that the long term impacts of the proposed forest management activities, including climate impacts, are thoroughly considered in order to ensure development decisions made now do not negatively impact future generations. It is also important to involve a broad range of voices within the Forest Management Plan approval process, including environmental organizations, so the full range of public interests and potential impacts are meaningfully considered by decision-makers.

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. We are a public interest environmental organization seeking to promote and facilitate good environmental governance and the protection of Manitoba's environment for the benefit of current and future generations.

***Consideration of Alternatives***

As the new Forest Management Plan (FMP) approval process adopted by the Government of Manitoba must continue to meet the requirements of *The Environment Act* and *The Forest Act*, it is important that the proponent demonstrates the need or rationale for their proposed forest management activities. This is particularly important in terms of identifying potential alternatives for the products or services to be provided, and processes and technologies to be used.



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In this case, the purpose of harvesting Manitoba's forest resources in this license area is to supply fibre for the manufacture of virgin single use kraft paper to be sold on the global market. In a world moving towards the circular economy<sup>1</sup>, does single use virgin paper manufactured from old growth trees in the remote northern boreal forest make economic and ecological sense? MbEN feels it is important to answer this question and properly consider if there is a pressing need for these unsustainable types of paper products or if there are more sustainable alternatives that do not require the harvesting of Manitoba's forest resources.

## ***Climate Vulnerability Assessment***

In an era of climate change brought on by global warming, MbEN thinks it is essential that the climate vulnerability assessment for the FMP also considers non-climatic factors, such as markets, jobs, and societal values.<sup>2</sup>

Given the known risks and vulnerabilities<sup>3</sup>, it is important that the proponent clearly identify the contingencies that will be built into the FMP. In particular, the proponent must address the potential loss of forest resources (and fibre) due to climate change and potential changes to the market for fibre/paper products due to a global shift towards a circular economy and other market disruptions as a result of climate impacts.

For example, will Canadian Kraft Paper Industries Ltd. and Nisokapawino Forestry Management Corporation be responsible for developing and funding a jobs retraining program or just transition strategy for their workers, in both the mill and woodland operations, should these industries no longer be economically and ecologically viable in the future? How will such contingences be addressed in the FMP and Forest Management License Agreement (FMLA)?

## ***Engagement Strategy***

We are pleased to see that the Draft Terms of Reference acknowledges the need for meaningful participation through the proposed Engagement and Communication Plans. Key

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<sup>1</sup> A circular economy aims to keep materials, components, products and assets at their highest utility and value at all times. In contrast to the 'take, make, use, dispose' linear model of production and consumption, material goods are designed and produced to be more durable, and to be repaired, refurbished, disassembled and reused in perpetuity - thereby minimising resource use, eliminating waste and reducing pollution. [See: *Circular Economy & the Built Environment Sector in Canada*, Delphi Group 2021]

<sup>2</sup> Climate change and sustainable forest management in Canada: a guidebook for assessing vulnerability and mainstreaming adaptation into decision making. 2015. Edwards, J.E.; Pearce, C.; Ogden, A.E.; Williamson, T.B. Canadian Council of Forest Ministers, Ottawa, Ontario. 160 p. <https://cfs.nrcan.gc.ca/publications?id=35956>

<sup>3</sup> For example, increases in tree mortality from fires, insects, disease and drought and shifts in species composition resulting in overall net biomass decline.



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principles for meaningful participation include access to information, the ability to influence the design of the process and the ability to have fair and equal access to the process.<sup>4</sup> However, we are concerned that the proposed Engagement Plan does not appear to identify any public interest environmental organizations as Stakeholders. Proponents should be required to consult with a full range of public participants when seeking approval for natural resource developments in order to ensure all potential public interests and concerns are considered. We recommend the proponent be required to identify and engage with ENGO stakeholders during the FMP approval process.

MbEN is also disappointed that the new FMP approval process does not include the opportunity for a public hearing hosted by the Clean Environment Commission. Historically, the approval of long term forest management plans has included robust public hearings, with participant funding, to ensure equitable and independent review of proposed plans occurs. MbEN recommends the addition of a public hearing to the public engagement plan, ideally held by the Clean Environment Commission, and the provision of participant funding so that organizations that do not have the financial capacity can engage more fully and effectively in the process.

In terms of access to information, we note that it was difficult to find the applicable Environment Act Licence (EAL No. 2302 ER) as there are numerous public registry entries that are not properly linked to the current FMP online registry file. There also does not appear to be public access to the current FMLA. It is important that the public registry file include access to all relevant regulatory documents – current and proposed – in order for a proper analysis of the proponent’s current activities and future plans can be made by independent organizations. MbEN requests a copy of the current FMLA and EAL be added to Public Registry File 3094.80 as soon as possible.

MbEN appreciates your consideration of our comments about Canadian Kraft Paper Industries Ltd. and Nisokapawino Forestry Management Corp.’s Forest Management Plan Draft Terms of Reference and welcomes future opportunities to engage with the Department in the assessment of natural resource developments in Manitoba to ensure the highest level of environmental protection measures are required. Under *The Environment Act*, the Department of Environment, Climate and Parks is tasked with protecting the quality of the environment and environmental health of present and future generations and providing the opportunity for all

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<sup>4</sup> International Association for Public Participation, Core Values for the Practice of Public Participation, Code of Ethics for Public Participation Practitioners <https://www.iap2.org/page/pillars>



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citizens to exercise influence over the quality of their living environment. We are confident you will adhere to these principles and ensure an informed decision about the proposed development can be made.

Sincerely,

Heather Fast, B.A., J.D., LL.M.  
Policy Advocacy Director

Glen Koroluk  
Executive Director

cc.

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