



# MANITOBA ECO-NETWORK

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Honourable Mike Moyes  
Minister of Environment and Climate Change  
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Dear Minister Moyes,

**Re: Roadmap to Net-Zero**

This submission provides feedback from the Manitoba Eco-Network (MbEN) in response to the EngageMB public consultation on Manitoba's *Roadmap to Net-Zero*. Members of the MbEN team were also present at the recent session held by the EAC to present the proposed contents of the roadmap to Net-Zero policy.

The Manitoba Eco-Network believes that to truly affect meaningful change, policy should be built from the ground up. Our work over the last four decades has strived to include the voices of everyday Manitobans and support the initiatives that benefit them directly. The *Climate Safe, Green City* project is one such initiative that MbEN has been working on that would not be possible without the financial support of the Government of Manitoba. In August 2025, we released a report that includes the results of our *2025 Cold Weather, Hot Weather, and Your Hydro Bills* Community Energy Survey, among other important insights on the supports Manitobans need to build climate resilience. The policy reforms suggested in the report encourage Provincial and Municipal governments to increase climate adaptation measures and strengthen community climate resiliency for Manitobans.

As an organization that focuses on supporting grassroots efforts and community-led climate initiatives, MbEN is concerned that the Government of Manitoba's approach to addressing climate change is too narrowly focused, siloed, and lacking meaningful opportunities for public engagement. While there are valid goals and potential solutions captured in the EngageMB survey, it remains unclear where Manitoba's *Roadmap to Net-Zero* fits within the provincial climate response. If this is the Government of Manitoba's only intended regulatory response to the climate emergency, it is woefully inadequate.

MbEN also has concerns with the seeming lack of meaningful engagement with Indigenous peoples or mention of the role of Indigenous partners in the Government's proposed approach to achieving Net-Zero. There is also no recognition of the past and ongoing harms disproportionately experienced by Indigenous rights-holders in Manitoba as a result of large-scale "clean" energy developments and associated infrastructure on which the proposed Policy will rely. This directly conflicts with recent public announcements made by the Government of Manitoba about partnerships with Indigenous nations for new energy projects

and Canadian legal commitments to the implementation of the *United Nations Declaration on the Rights of Indigenous Peoples*.

### Public Consultation Process

While MbEN appreciates the public consultation opportunity provided by the Department of Environment and Climate Change through EngageMB, the timing and scope of this process is likely to result in a lower response rate and data that does not accurately reflect the public's interests on the topic of climate change and the changes that we, as a society, need to make to ensure a more sustainable roadmap forward. It is a well known fact that in Manitoba, everyone tends to take most of their vacation time in July and August. Timing the consultation period to take place over the summer and end the first week of September was an oversight. There was also little to no advertisement or media coverage of the release of the survey. The consultation period should have at least extended a few weeks into September and been advertised more broadly so members of the public were aware of the opportunity.

The public consultation process also could have benefited from more background information. This includes more information about the consultation itself (e.g., how the information gathered is going to be used by decision-makers) and background on the Government of Manitoba's overall approach to addressing serious environmental problems like climate change. A larger variety of consultation opportunities, including in-person events, could have also helped as the public would have had the opportunity to ask those who designed the survey instrument and other government materials questions about the content and process. For example, the parallel, invite-only consultation process being conducted by the Expert Advisory Council (EAC) and the Department of Climate Change could have been opened to interested members of the public. Two MbEN staff members attended the September 4th session where proposed elements of the *Roadmap to Net-Zero* were presented for feedback.

We again have concerns with the timing of consultation activities associated with the *Roadmap* as there is direct overlap between the very general public consultation that seems to be seeking broad basic feedback to be used to start developing the *Roadmap*. Attending an overlapping consultation event where details about proposed plans and activities were presented suggests that the public feedback gathered through the EngageMB process was never going to be meaningfully considered in the development of the *Roadmap to Net-Zero* as the Department already seems to have identified detailed components of the *Roadmap*. The scheduling of the September 4th event during the Assembly of First Nations (AFN) Annual General Assembly is also questionable as this very likely decreased the participation of Indigenous rights-holders in consultation opportunities.

For more information and advice about meaningful public participation we recommend the Government of Manitoba engage with the internationally recognized experts you are lucky to have here in Manitoba, including new members of the Clean Environment Commission (CEC) - Dr. John Sinclair and Dr. Alan Diduck - among other members of the CEC with valuable experience and insights in this area. Dr. Sinclair also led a very useful [project](#) that produced insights for the use of qualitative methods in environmental consultation and decision-making contexts.

### Manitoba's Roadmap to Net-Zero

The Manitoba Eco-Network supports the overall goal of achieving Net-Zero GhG emissions in Manitoba. From the information available through EngageMB and the EAC session, there appears to be some promising proposed actions for achieving Net-Zero. Although we will need to wait and see the final policy, there seems to be a variety of positive solutions being contemplated, including investments in education and re-training of the workforce, protection of forest and peatland areas, and much needed investments in wildfire education and prevention. Both the survey and discussion at the EAC engagement session also included reference to solutions and issues that go beyond the reduction of GhG emissions. For example, there are references to changes in consumer behaviour (e.g., purchasing products that are “local and durable”) and waste diversion/reduction (e.g., compost).

However, it is unclear, based on available information about the proposed elements of the *Roadmap*, how this policy will fit in the Government of Manitoba's overall plan for addressing the climate emergency and the very real and scary impacts of climate change, such as the extreme forest fires seen in Summer 2025. The scope of the EngageMB survey questions suggests the Government of Manitoba's climate plans are too narrowly scoped to adequately address the full range of climate impacts experienced by Manitobans. While some concerns were alleviated or at least addressed during the September 4th EAC consultation event, if the *Roadmap to Net-Zero* is the Government's only planned response, there is a lot missing.

It remains unclear who, within the Government of Manitoba, is working to develop the comprehensive and inclusive climate plan needed to protect current and future generations from the negative impacts of climate change. The EngageMB consultation page indicates that Minister Moyes is the responsible decision-maker “listening” to the feedback received. However, the survey includes issues and solutions that would require the input and approval of a range of other Departments and decision-makers. This includes the Departments and/or Ministers of Business, Mining, Trade and Job Creation; Finance; Transportation & Infrastructure; Natural Resources and Indigenous Futures; Immigration & Labour (e.g., building codes); and Innovation and New Technology, among others. While the Minister of Environment and Climate Change does appear to have primary responsibility over many of the core elements that seem to be captured in the *Roadmap to Net-Zero*, there is significantly more information needed on inter-departmental coordination. There is no possible way Minister Moyes and his Department can, or should, be responsible for accomplishing the full suite of actions needed in the Government of Manitoba's Climate Action Plan, or even the full scope of activities that seem to be included in the *Roadmap* policy.

### Who is Responsible For Achieving Net-Zero?

All Manitobans have a role to play in addressing the climate crisis and moving society forward in a more sustainable direction. However, the EngageMB survey had an unexpected emphasis on measures citizens can take in their personal lives to reduce emissions. While we all need to make changes in our lives to achieve net-zero emissions, among other environmental goals we should be aiming for (e.g., biodiversity and conservation), the Government of Manitoba is the entity that bears most responsibility for the political, policy, and legal changes that are needed to make internal government transformations, and encourage better behaviour from those entities and industries most responsible for producing large-scale

emissions and other environmental harms. The Government is also responsible for enforcing environmental standards and punishing those who cause harm to the environment and human health.

The EngageMB survey and information from the EAC session did not seem to reflect this reality. Most of the solutions identified seem to put a lot of responsibility on citizens to undertake actions, like buying new vehicles and upgrading their living spaces, that will require economic sacrifices and disposable income that frankly, fewer and fewer Manitobans have available to them. If this is the Government's preferred approach, the final *Roadmap to Net-Zero* should focus on making investments that are going to directly support and empower Manitobans to take climate action and build climate resilience. Especially since the Government of Manitoba has still not formally recognized the role and responsibility of the public in the provincial environmental governance framework, such as through the recognition of the right to a healthy environment. If the public is going to bear the responsibility for transitioning society in a new direction, then the Government needs to focus its plans and resources on empowering the public and ensuring they have meaningful involvement in the development and implementation of Manitoba's provincial climate response. This includes access to legal resources and tools to engage in decision-making and enforcement processes.

There was also a concerning lack of discussion of the role of Indigenous rights-holders and the many Indigenous governments in Manitoba in the survey and limited acknowledgement at the EAC session. This is particularly problematic considering Indigenous communities living near large-scale natural resource developments and electrical infrastructure, e.g., First Nations near Hydroelectric dams, have disproportionately borne and will continue to bear the negative impacts of "clean energy" projects in Manitoba. Indigenous rights-holders are also members of the public, and should be acknowledged and included in all public policy solutions. This lack of inclusion also appears to contradict recent public announcements by the Government of Manitoba about partnerships with Indigenous nations for new energy projects and Canadian legal commitments to the implementation of the *United Nations Declaration on the Rights of Indigenous Peoples*. The *Roadmap to Net-Zero* cannot be taken without guidance and leadership from our Indigenous partners.

The role of industry and private business in the *Roadmap to Net-Zero*, while acknowledged, was not entirely clear. More information about the goals of the policy and the definitions of key terms, such as "green economy" and "net-zero economy" should be included in the final policy. Definitions should include a high-level breakdown of the differences from the way our economy functions today. If there truly are many "leaders in the green economy" in Manitoba, as implied by the EngageMB survey, that public tax dollars are going to be supporting, more transparency and accountability is needed. The final *Roadmap* should include clear financial details and projected amounts for any proposed investments or economic incentives provided to private entities. The department should also clarify the legal responsibilities and liabilities that these "leaders in the green economy" will assume when receiving publicly funded support.

#### Recommendations for the Roadmap to Net-Zero:

From the limited public information available, the *Roadmap to Net-Zero* seems like it will contain some positive solutions and actions. However, the policy could be strengthened in

many ways and should be better tailored to meet the specific needs of Manitobans. There is also a need to address the complexities associated with many of the proposed solutions that will require coordination of multiple stakeholders, departments, and possibly other levels of government. For example, the protection of forests and peatland will require limiting natural resource developments and the development of new infrastructure projects, which will impact the way permitting, impact assessment, and licensing processes are undertaken moving forward. Investments in wildfire protection and prevention is another much needed and welcomed action, but there should be meaningful engagement and involvement of Indigenous rights-holders, who have been disproportionately impacted by the wildfires this summer, in determining the where and how resources are distributed. There should be a particular focus on Indigenous-led approaches and investment in local emergency and wildfire protection services. The following section includes high level recommendations for improving both the *Roadmap to Net-Zero*, and the Government of Manitoba's overall response to the climate crisis.

### **1) Acknowledge the Role of Indigenous Rights-Holders**

Meaningful consultation is needed with Indigenous Rights-Holders to determine their role in the Government of Manitoba's climate response. The past and ongoing harms experienced as a result of colonial and settler activities, including the development of hydroelectric infrastructure and transmission lines, need to be directly acknowledged in the *Roadmap* and meaningful solutions should be sought, including those that go beyond economic benefits. The Government of Manitoba needs to step up and commit to the implementation of the *United Nations Declaration on the Rights of Indigenous Peoples* and adoption of new legal approaches like the *National Strategy of Environmental Racism and Environmental Justice Act* at the federal level.

### **2) Develop more Specific Targets and Actions**

The Manitoba Eco-Network recommends the inclusion of clear targets and objectives in the *Roadmap to Net-Zero*. If the main focus of our provincial climate policy is the reduction of GhG emissions, we need a target for how much we intend to reduce our emissions here in MB that is in line with science (i.e. 45% below 2005 levels by 2030). We also need transparency on how much of our emissions Manitoba intends to eliminate through reductions in GhG emissions in comparison to how much we intend to offset. We also need major financial commitments behind a plan. At the September 4th EAC consultation event it was suggested that major investments would not be needed until around 2030 when it is anticipated that new technological developments will mature. Respectfully, waiting until 2030 to make major investments is too late. We need major investments and action now. There are many knowledgeable individuals and organizations in Manitoba that could help with the identification of such funding and action targets, including our colleagues from Sustainable Building Manitoba and the Climate Action Team who have also provided valuable feedback on the *Roadmap*.

### **3) Take A Coordinated and Comprehensive Response to the Climate Crisis**

The Roadmap to Net-Zero does not appear to be a comprehensive provincial response to the climate crisis. While this policy seems like it could play a valuable role in transitioning society in a more sustainable direction, it reflects a narrow and siloed approach to addressing the very real and serious impacts Manitobans are already experiencing as a result of climate

change. There is a desperate need for a coordinated, comprehensive and inclusive climate action plan in Manitoba.

Meaningful consultation with Indigenous Rights-Holders and members of the public should be undertaken to determine the full scope of Manitobans' climate concerns and further discussions should be held with local experts and organizations who have long been making recommendations for strengthening Manitoba's climate response. For example, the Climate Action Team (CAT) has recommended four high-level characteristics that should be encompassed in Manitoba's climate response. This requires a provincial climate policy that is **comprehensive**, includes **strong targets**, is **well-resourced**, and **equitable**. We agree that these are good characteristics and could result in a climate plan that reflects public interests and needs, including measures for protection of the most vulnerable.

**Comprehensive:** A comprehensive climate policy that covers all major sectors, including agriculture and transportation, is the best way forward. This requires an all of government approach with the coordination between the Departments who share environmental responsibilities at the provincial level. Minister Moyes also needs to be granted the appropriate legal powers and funding needed to successfully undertake such coordination, if the Minister of Environment and Climate Change is to take a leadership role.

A more comprehensive approach requires inclusion of other legal processes and mechanisms that could play a role in reducing GhG emissions and climate impacts. This includes the provincial impact assessment process, land use planning requirements both at the provincial and municipal levels, natural resource approval and licensing processes - e.g., Water Power Act Licences. Legal reforms to improve assessment, monitoring and follow-up practices, for example, could help identify problematic projects and untested new technology. The approval of new developments or expansions of existing infrastructure needs to be assessed based on more than just projected GhG emissions, and must address the full scope of potential impacts, particularly potential negative impacts on human health and the environment.

When considered from a broader perspective, some of the proposed solutions that have emerged from the consultation materials for the *Roadmap to Net-Zero* do not have as much potential to improve Manitoba's current climate problems. For example, there should be no reliance on costly and unproven technologies such as Direct Air Capture (DAC), the extraction of CO<sub>2</sub> from ambient air, and Carbon-Capture and Storage (CCS), the capturing and storage of CO<sub>2</sub> from industrial sources. Manitobans can't afford to pay for risky unproven ideas!

As we noted in [our response](#) to the implementation of *The Carbon Capture and Storage Act*, CCS technology has not proven effective in reducing carbon emissions. CCS is highly energy-intensive, often increasing the energy demand, which can lead to more carbon emissions. CCS is also extremely expensive, costing billions of dollars, with much of the cost often falling on taxpayers. There are also considerable problems with DAC. As discussed in [our letter](#) regarding Manitoba Hydro's Integrated Resource Plan (IRP), the IRP's vision of a net-zero economy is dependent on a completely unrealistic ability to offset GhG emissions through DAC. DAC is still unproven technology and requires massive amounts of electricity. Counting on substantial DAC use for a net zero economy sets Manitoba up for significant capacity challenges as 2050 approaches. Local climate organizations have identified lower cost, and more effective ways to reduce carbon emissions in our province. This relies on reducing GhG emissions at

source, and protecting existing ecosystems (peat bogs, wetlands, forest, etc.) that are much more effective at sequestering carbon.

There is also a need to adopt a climate justice lens and ensure any provincial climate responses are inclusive and protect those most vulnerable to the negative impacts of climate change. Citizens also need to be empowered to take action. If the Government of Manitoba wants to assign Manitobans responsibilities, the public needs to receive appropriate resources and legal rights so we can actually fulfill our role in the provincial climate plan.

**Strong Targets:** Manitoba's climate strategy should incorporate strong targets for GhG emissions, and other important environmental standards. This includes 2030 and 2035 emissions-reduction targets, as recommended by CAT. There should also be linkages to conservation and biodiversity goals (e.g., 30x30), which if achieved, will also play a valuable role in supporting Manitoba's path to Net-Zero. Particularly when important carbon sinks like forests and peatland areas are protected.

**Well Resourced:** Manitoba's comprehensive climate approach should be well-resourced, with policies like the *Roadmap to Net-Zero* backed with significant funding in Budget 2026, as detailed by CAT in their submission. While economic resources are important, there is also a need to build capacity in other areas. This includes a need for more public education on climate change, its causes (i.e., human behaviour), and the impacts Manitobans can expect to experience more in the coming years.

Access to regularly updated public information about the state of Manitoba's environment, including data about wildfires and extreme weather, would be a very valuable tool to help Manitobans better understand and address climate change. For example, an annual report similar to the State of Environment (SOE) reports published by the Government of Manitoba from 1991-1997 and the Provincial Sustainability Reports (2005, 2009). The SOE reports were available until the law was reformed in 1997 and the respective provision was repealed (SM 1997, c 61, s 21). Although some of the information typically included in the SOE reports subsequently made to the Legislative Assembly from provincial departments, overall, Manitobans have been without a fulsome analysis of the state of the environment from provincial sources or comprehensive data sets since 1997.

**Equitable:** The provincial climate strategy should also be inclusive and advance socioeconomic equality to ensure nobody is left behind. This requires the development of programs and mechanisms to address energy poverty and support local climate resilience, among other approaches that emerge when you approach climate change through a climate justice lens. "A climate resilient community is one that can actively prepare for changes to the local climate, respond to its effects, and continue to thrive under evolving environmental circumstances." (CSGC Report 2025) Some of the solutions that seem to be included in the *Roadmap to Net-Zero* may help build resilience, for example the opportunity to provide more Provincial support to public transportation in urban centers, or to improve and expand the active transportation network in the City of Winnipeg. However, investments in infrastructure should go beyond transportation to include other greening and reliance measures such as installing and maintaining green corridors along high temperature thoroughfares as identified using GIS urban heat mapping, utilizing green infrastructure to seasonally reduce ambient indoor temperatures

in high-density housing, and other anthropogenic heat reduction measures that can serve to reduce current energy demands. The Manitoba Eco-Network would also like to see re-investment in existing residential deep energy retrofit (DER) programs and incentives, for example programs facilitated by Efficiency Manitoba, while also addressing potential social and financial barriers that may affect Manitobans and prevent equitable user access to such programs. ([CSGC Report 2025](#))

#### *Moving Forward:*

The Manitoba Eco-Network appreciates the opportunity to provide feedback to the Department of Environment and Climate Change on the EngageMB survey and EAC consultation session provided for the highly anticipated *Roadmap to Net-Zero*. Although it is unclear how the feedback received through this consultation process will be used by the Department in the development of the Roadmap to Net-Zero, we urge the Government of Manitoba to consider our recommendations for improvement, and those provided by many of our colleagues in the environmental community.

Overall, if this is the only provincial response to the climate crisis, we recommend the scope of the *Roadmap* be expanded to include a more comprehensive range of solutions that go beyond emission reductions. We acknowledge that the climate emergency is very complex and constantly changing and have highlighted the positive elements of the Roadmap that seemed to emerge from the information provided during the consultation. There is good work being done, but there is clearly a need for more discussion with Indigenous rights-holders and the public to capture the full scope of Manitobans' needs in the context of the climate emergency.

Under *The Environment Act*, the Department of Environment and Climate Change is tasked with protecting the quality of the environment and environmental health of present and future generations and providing the opportunity for all citizens to exercise influence over the quality of their living environment. As the responsible Minister for the development and implementation of the *Roadmap to Net-Zero*, we expect Manitoba's newest response to the climate emergency to reflect these important priorities and responsibilities.

Sincerely,

James Beddome, Executive Director

Heather Fast, Policy Advocacy Director

Sorsha Moore-Peters, Projects Manager

#### **About Manitoba Eco-Network:**

*The Manitoba Eco-Network is a non-profit registered charity which seeks to strengthen Manitoba's environmental community with the goal of protecting our environment for the benefit of current and future generations. We serve as an umbrella for environmental non-governmental organizations across the province. We build capacity and support grassroots organization's participation in the environmental community, we celebrate positive environmental actions that happen within Manitoba, and work to elevate the voices of all those within our community. Our mission is to promote good environmental governance, support and build capacity, advocate for environmental justice, and act as a bridge between environmental organizations, the public, and all levels of government.*