

July 30, 2014

To: Manitoba Conservation and Water Stewardship, Wildlife Branch

Re: Feedback on Manitoba's Boreal Woodland Caribou Recovery Strategy

From: Manitoba Regional Working Group of the Canadian Boreal Forest Agreement (CBFA)¹

Please find here feedback from Members Manitoba Regional Working Group (MB RWG) of the Canadian Boreal Forest Agreement (CBFA) regarding the recently released provincial Recovery Strategy for Boreal Woodland Caribou (hereafter the 'strategy'). The CBFA is an unprecedented collaboration among 21 major North American forest products companies and seven leading environmental organizations. The CBFA seeks to achieve both high degrees of social and economic prosperity and high degrees of ecological integrity.

MB RWG is comprised of forest companies, environmental groups, and First Nation members in the planning area. The work of the MB RWG is not intended to take the place of existing or future public government, First Nation, and Aboriginal government processes that address similar issues. The CBFA signatories recognize the legal responsibility and authority for land use decisions and for conservation and resource management policy rests with public governments, including First Nation and Aboriginal governments. Rather, the CBFA seeks to create a space to develop solutions together, which can then be proposed to all governments.

The CBFA recognizes the importance of the boreal region to First Nation and Aboriginal people and acknowledges the value and significance of their involvement in successfully implementing the CBFA in their traditional territories. Through the Agreement, the signatories are committed to seeking the engagement and participation of affected First Nation and Aboriginal governments and their respective communities and ensuring that all efforts respect Aboriginal and Treaty Rights, cultural heritage, and aspirations.

General comments

The members of the MB RWG congratulate Manitoba Conservation and Water Stewardship for its draft strategy. This comprehensive plan puts Manitoba at the forefront of caribou conservation in Canada by ensuring management decisions will balance caribou conservation

¹ The members of the Manitoba Regional Working Group are Norway House Cree Nation, Chemawawin Cree Nation, Pimicikamak Territory, Mosakahiken Cree Nation, Tolko Industries Ltd., TNC Canada, ForestEthics, International Boreal Conservation Campaign, and the Manitoba Chapter of the Canadian Parks and Wilderness Society.



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with the demand for boreal forest resources. This goal is consistent with the CBFA's 'twin pillars' operating principle, in which we work towards outcomes that achieve both high degrees of social and economic prosperity and ecological integrity.

The strategy demonstrates many shared interests with the MB RWG regarding caribou conservation. In particular, we value the commitment in the strategy to:

- caribou populations that are self-sustaining with high probability of long-term persistence
- a prosperous, economically viable and environmentally sustainable economy.
- Finding ideal solutions that are consistent with other aspects of sustainable forest management, e.g. access management.
- a process to ensure effective monitoring and an active adaptive approach to caribou management and habitat conservation.

We are pleased to see acknowledgement in the strategy of the role and knowledge of First Nations and Aboriginal peoples in caribou recovery. In the Specific Comments section we make suggestions on how the language in the strategy can be consistent in regard to traditional and local knowledge being used in caribou conservation.

We are encouraged to see the strategy's commitment to "ensure that protection and forest management planning supports conservation of large suitable areas of caribou habitat through the development of dynamic caribou habitat plans within management units along with large core areas where forestry does not occur." This is entirely consistent with the MB RWG's approach to caribou action planning where we are presently exploring options for large core areas of caribou habitat that would be off limits to commercial harvest, along with dynamic habitat planning in harvest management zones. We reiterate that this approach must support and align with the rights and aspirations of First Nations and Aboriginal peoples within their traditional territories.

Specific comments

In the Preface section, as well as stakeholders, reference First Nation and Aboriginal participation. We are pleased to see this included in the Acknowledgements section.

In the Executive Summary, we are pleased that the province is committing to enhanced monitoring to improve an understanding of caribou range occupancy. For consistency, it would be valuable to include the province's commitment here to gather and use First Nation and Aboriginal knowledge for this same purpose as wisely identified in the strategy's recovery objectives.





In the Introduction, in the 1st sentence of the 4th paragraph that refers to caribou management efforts it would be appropriate to highlight the aim to include First Nation and Aboriginal knowledge in these efforts.

On Page 8, there is mention of how the fire regime in Manitoba's boreal forest generally precludes the existence of large contiguous areas of mature forests within caribou ranges. Of course it depends on what is meant by 'large', but based on our fire history and industrial disturbance mapping, the distribution of forest ages across the landscape, and mapping of areas with relatively low probability of burning (e.g. areas with many lakes, natural fire breaks or peatlands), we conclude many very large contiguous areas of mature forests do indeed exist in Manitoba that are suitable for woodland caribou.

On Page 9, the RWG appreciates the Plan's recognition of the dynamic nature of the forests suitability for caribou habitat and the opportunity to use fire management and harvest and silviculture practices in an adaptive process as this is key to achieving the RWG's goal of ensuring the prosperity of the forest industry and local communities.

On Page 11, in Guiding Principles (sec. 3.6), we applaud the mention of addressing cumulative effects of all factors affecting boreal caribou; we recommend explicitly outlining ways that addressing cumulative effects will influence decisions on proposals for new developments. This should include explicitly measuring and managing disturbance at the range level.

On Page 12, we are pleased about the strategy's acknowledgement of Aboriginal people and boreal caribou. "Manitoba is committed to engaging Aboriginal communities in boreal caribou recovery and conservation efforts through partnership opportunities in monitoring programs, recovery action planning and by ensuring traditional knowledge is woven throughout the entire process. We recommend prefacing Aboriginal with First Nations.

Specific areas for inclusion:

- We recommend including some detail about the roles these partnerships will play and what avenues may be used to gain First Nation Aboriginal knowledge and interests in regard to caribou
- Make language in the document consistent regarding use of science and Aboriginal knowledge
- Include upholding Aboriginal and Treaty Rights by maintaining their relationship with caribou
- Provide explicit definition of "Aboriginal"
- Provide support for land use planning, training and employment opportunities for Aboriginal people
- Recognition of First Nation traditional territories
- Province to support Aboriginal communities in designing community-based caribou education and mentoring programs





On page 12, we recommend including a commitment to ensuring that First Nation and Aboriginal Treaty Rights are upheld in all caribou conservation efforts. We also recommend including a commitment to consult Aboriginal governments regarding all land use decisions in their traditional territories relative to the caribou strategy.

On page 12, we request that Aboriginal people are identified as First Nations, Métis, and non-status.

On page 12, we recommend substituting “close” with “intimate” in the 2nd sentence as we believe this more accurately captures Aboriginal people’s connectedness to the land.

On page 12, we recommend adding a sentence that identifies that for Aboriginal and Treaty Rights to be upheld, woodland caribou must be maintained in a healthy state across their traditional territories.

On page 12, we ask that “Aboriginal communities” is prefaced with the words “some” and “First Nations” in the 4th sentence to make it clear not all First Nations and Aboriginal communities have participated.

On Page 14, under ‘Maximizing Habitat Protection’, we are pleased that habitat conservation enabled by *The East Side Traditional Lands Planning and Special Protected Areas Act* is noted. We recommend a brief acknowledgement to the involved First Nations for their tremendous efforts with their land use planning initiatives.

On Page 15, under ‘Improving Population Monitoring’, we suggest it would be helpful for northern communities to include a commitment for training and employment opportunities for local First Nations and Aboriginal people to assist with ongoing monitoring efforts.

On Page 16, under ‘Legislation and Policy’, we are pleased that “Manitoba will ensure incorporation of boreal caribou conservation concerns in land use planning initiatives across the province.” We recommend including here that the provincial government aims to support First Nation and Aboriginal land use planning, as this planning could be a key mechanism for protection of caribou and other natural values.

On page 19, Under Conservation Status Assessments, it would be helpful to include data at the range level for population health and habitat status.

On Page 21, we suggest adding mention of conservation of large contiguous areas with low disturbance footprints to act as core habitat anchor areas.

On Page 21, under ‘Recovery habitat’, the strategy mentions that dynamic habitat planning offers an opportunity to address cumulative impacts and increase the probability of long-term



persistence of caribou at the local range and the management unit scales, and providing a future forest condition suitable for caribou occupancy. We recommend stressing the importance of the experimental nature of dynamic habitat planning and the critical need for further analysis of this approach including understanding of how long it takes for caribou to reoccupy habitat.

On Page 23, we suggest key benchmarks be associated with specific timelines.

Consistent with the goals of the CBFA, our group comprised of the Forest Industry, Environmental organizations and First Nations advisors continue to work on comprehensive recommendations for the boreal forest in Manitoba. Throughout the past 4 years the group has completed significant technical analysis on fibre supply impacts, caribou habitat and numerous ecosystem aspects of the boreal forest. We would welcome the opportunity to outline to the Wildlife Branch how we view our approaches can be aligned to create an effective Caribou Plan for the province as we believe that adoption of this work by the Manitoba RWG would accelerate Manitoba's efforts to complete caribou recovery plans.

The Manitoba Regional Working Group of the Canadian Boreal Forest Agreement appreciates the work of Manitoba's Conservation and Water Stewardship Wildlife Branch on the Boreal Woodland Caribou recovery strategy and we look forward to meeting to further discuss development of the final plan.

Yours truly,

CBFA Manitoba Regional Working Group

