

ENR Legislation Review: *Forest Management and Protection Act*

Alternatives North's initial comments March 27, 2018

Key Amendment	Comment
Regulation and Operational Scope for Management	<p>Support that this includes commitments to ecological integrity and tools such as ecosystem-based processes and adaptive management.</p> <p>Support reporting on the forest landscape, including its forest ecosystem health, sustainability of forests, and forest carbon. Request that report on this is done to tie into the State of the Environment report, so silos are broken down between departments/sections. Reporting should include an analysis of seasonal and yearly trends, cumulative effects, reforestation efforts, sustainable harvesting, and cultural and environmental integrity implications of forestry activities.</p> <p>Support that the co-management board processes are paramount, and enhanced where applicable.</p>
<p>Forest Ecosystem Management Plans (FEMP)</p> <p>NOTE: Tom Lakusta said he would provide information on the management plans. Not yet received.</p>	<p>Possibly ask that old growth forests and similar rare parts of the overall forest ecosystem can be protected within a FEMP. Plans must include requirement and methodology for monitoring, reporting and evaluation.</p> <p>Support a mandatory review every five years.</p> <p>Support that the minister can require a FEMP in non-forest management agreement areas. The minister should not be allowed to exempt the requirement for a FEMP.</p> <p>FEMPs will be public once complete; unclear on how the public can be included in the process.</p> <p><i>Question:</i> Please clarify obligation for public to be involved in development of FEMPs</p> <p>Suggest there should be a requirement for annual public reporting under each FEMP and that all correspondence (including inspections) between ENR and FEMP holders is part of a public registry system.</p>
Licenses and Securities	<p>Support requiring securities for road and landings</p> <p>Support desire for more community input and community-level forestry, including non-timber products</p>
Non-Timber Forest Products	<p>Support the overall goal of understanding and supporting sustainable harvest of non-timber forest products.</p> <p>As with Protected Areas comment, concerns regarding</p>

	'artisanal use' and how this is interpreted.
Wildland Fire Prevention	<p>Support authority for wildland fire management within a hierarchy, similar to Waters Act, where human use is first, considered as part of the ecosystem; ecosystem uses are considered above industrial uses. However, we believe there are cases where ecosystem values many outweigh the desire to protect (for example) a single cabin.</p> <p>Suggest that the current identification of values needs to go beyond human use, and how values are weighted needs additional discussion.</p> <p>Slide 81. Rather than allowing no liability for fire fighting, clarify where liable and on what basis. The past failures indicate the public requires a right to bring this level of accountability to failed mandates.</p>
Burns Permits and Closed Districts	Support continuing with a scientific, expert opinion basis for fire bans, such as the Canadian Forest Fire Danger rating.
Fines, Fees and Charges	<p>The creation of the Forestry revolving fund is a laudable goal, seeking to offset the impacts of harvesting. However, we strongly caution the GNWT that they need to express that this matter is being done with limitations – that it does not transfer any liability for revegetation from industrial activity to the GNWT.</p> <p>Concern with the example given at March 1st meeting that there would be no fees for collection of morels for sale. Since this is a public resource, and since public resources are required to understand contaminants of mushroom and to manage the influx of pickers, suggest that a fee is needed even for 'artisanal' use (i.e., beyond personal).</p>
New Authorizations – Import Permits	<p>Support import permits to help control spread of pests and diseases.</p> <p>Support discretionary Ministerial authority to <i>add</i> requirement for other types of import permits, but not discretion to exempt</p>
New Authorizations – Incidental Use Forest License	Support additional requirements for incidental forest use. Historically this has caused fragmentation. Cutting for seismic lines and other non-forestry uses needs to include considerations for hydrology and sensitive areas. Roads should not necessarily be 'shortest distance between two points' but be required to take ecological factors into consideration. Include requirements for community use of cut materials, possibly pre-harvest of area for community use.