

COURTESY TRANSLATION

Sainte-Foy, November 21<sup>st</sup> 2005

Mr. Pierre Corbeil  
Minister  
Ministère des Ressources naturelles et de la Faune  
5700, 4<sup>th</sup> Avenue West, A-308  
Québec (Québec) G1H 6R1

Subject: Instructions for the preparation of a General Forest Management Plan

Dear Minister Corbeil,

Last September 21, through Mr. Marc Ledoux, Associate Deputy Minister of Forests, you requested the comments of the Cree-Québec Forestry Board on draft instructions for the preparation of the General Forest Management Plans (GFMP) which instructions would be sent to the agreement holders before the end of the current year. We have reviewed the draft instructions and we are pleased to submit our comments.

In order to put into perspective the important process that constitutes the development of GFMP, the instructions should be sent to agreement holders with emphasis put on the government's policy directions concerning forest use and management. In the draft instructions, the introduction only refers to the revised forest framework but does not underline the shift towards a sustainable forestry that integrates the multiple uses of the forest and ensures the protection of ecosystems and species biodiversity. The Board is of the opinion that the instructions should be presented in the framework of sustainable development and recognition of the forest as a common heritage, as stated in the preliminary provisions of the *Forest Act*.

In the past year, you have proceeded to a broad public consultation on the forest resources protection and development objectives (FPDOs) to ensure their sustainable development. On this occasion, you asked for an advice from the Board which resulted in adding a new objective, FPDO #11, which takes into account the reality of the *Agreement concerning a new relationship between le gouvernement du Québec and the Crees of Québec* that prevails on the James Bay Agreement territory. This objective, worded as follows: "Maintaining and improving the habitat of wildlife species of importance to the Crees and fostering harmonization of different uses in order to create environmental conditions conducive to traditional cree activities", is at the core of the Agreement and deserves a special attention from the agreement holders working on the territory.

Now, in the document we reviewed, only the FPDO title appears without any content, which leaves us somewhat perplexed. Consequently, we are proposing in the attached appendix 1 a wording that takes into account the importance of this objective but that also ensures that measurable results will be evaluated as part of a predetermined monitoring program.

Concerning FPDO #6, "Protecting the habitats of threatened or vulnerable forest species" and, more specifically concerning the woodland caribou now designated as a vulnerable species in Québec, the Board recommends that this FPDO apply to the territory of the Agreement. In that sense, the ministerial direction # 2003-16B should be reviewed in order to ensure its application on the Agreement territory with the relevant adaptations.

On a more general level, the Board wonders about the government's intentions concerning the conservation of protected areas during the period coinciding with the next GFMPs, i.e. from 2008 to 2013. The territory of the Agreement currently includes less than 3% of protected areas, and this number does not include protected areas proposals presently under review by the Ministère du Développement durable, de l'Environnement et des Parcs. If it is planned to increase this ratio, no indication is given in this regard in the instructions to agreement holders. Knowing that such policy direction will impact on forest yield, the Board recommends that the government's intentions regarding conservation be made public when instructions are sent to agreement holders.

Chapter 3 of the instructions deals with Aboriginal communities, including a specific section for the Crees. This section refers to the Agreement and goes over several modalities of the said Agreement. You will find in the attached appendix 2, the main adjustments recommended to this section. The areas of special interest agreed upon under the Agreement (1% and 25 %) are the basis for the application of these modalities. The Board is concerned by the fact that to this day, it appears that the surface area and location of certain of these areas are not officially determined and that different problems related to the identification of these areas remain unresolved. It appears urgent that measures be taken to make sure that the agreement holders have official and complete information before developing the plans.

Furthermore, we wish to point out that certain sections of the Agreement require that the parties agree to clarify their interpretation of how it applies in the field. This work must be done as soon as possible as this could create confusion and potential conflicts between the actors involved in the future development and analysis of the plans. In Appendix 3, we identify the main elements of the Agreement that require to be analysed to this effect, and the Board recommends that you set up without delay a technical team to clarify these items.

The instructions are intended for agreement holders but they involve third parties contribution and collaboration, and more particularly the tallymen, for completing the required information in the Cree section. In the past few years, as part of the implementation of the Agreement, the Joint Working Groups (JWG) had to act as intermediary bodies to ensure communication between the agreement holders and the tallymen. The Board is of the opinion that, as defined in the Agreement, the tallymen's role must be enhanced and that the consultation process for the development of the

future GFMPs should provide for their active and meaningful participation in all steps of the process, from the planning to the implementation and the monitoring. To this end, the approaches developed as part of the directives on wildlife habitat protection and management strategies should contribute to facilitating the consultation processes. We recommend the parties to the Agreement to do what is necessary for this basic principle to be complied with.

To make sure that the forest management strategies developed by the agreement holders give special attention to wildlife habitats protection and development, it is important that the instructions on wildlife habitats management strategies as well as the mixed forest stands management strategy be made available and applicable to future GFMPs.

To this end, we are proposing in Appendix 2 a specific wording for the wildlife habitat protection and development strategies under the heading “3.2.4 Forest Management Strategy”. It is proposed that, before April 1<sup>st</sup> 2006, the parties take the necessary measures involving the stakeholders to ensure a mutual understanding of the strategies with a view to facilitating their integration into the forest management plans. Such measures could include a guide or procedures to be made available to the agreement holders or workshops with various stakeholders to review the proposed strategies and their implementation. As for the mixed forest stands management strategy, it is urgent that the Department finalise this dossier. Indeed, this strategy is very important for the protection and development of wildlife habitats. We ask the Department to finalise this mixed forest stands management guide and to proceed with the consultations as soon as possible.

Finally, the agreement holders will have to integrate a lot of information of a diverse nature including traditional knowledge provided by the tallymen. To ensure that this information is protected against undesirable use, the parties must come, in the short term, to a confidentiality agreement that will facilitate the development and consultation of future GFMPs.

In closing, please find in Appendix 4 detailed comments on several sections of the document on the draft instructions to the agreement holders that deserve the attention of those responsible for finalising these instructions. The Board members are very interested, prior to the official transmission of the instructions to the agreement holders, to be informed of your position with regards to the comments herewith submitted.

Be assured, Minister Corbeil, of our full collaboration and please accept our kindest regards.

Jean-Pierre Gauthier  
Chairman of the Board

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# Appendix 1

## Proposal for FPDO no 11

### **4.1.1.11 FPDO no 11 : Maintain or improving the habitats of wildlife species of importance to the Crees and fostering the harmonization of different forest uses in order to create environmental conditions conducive to traditional Cree activities**

This FPDO (Forest resource protection and development objective) ensures the maintenance of the biodiversity and viable ecosystems on the Territory, the integration of Cree concerns and traditional knowledge and allows their true and significant participation in the process of forestry planning.

Taking this objective significantly into consideration requires the acquisition of specific knowledge. This FPDO must be implemented respecting objectives and provisions of the *Agreement concerning a new relationship between le Gouvernement du Québec and the Crees of Québec*. More specifically it must allow better understanding of objectives related to traditional Cree activities, identification of the sites of special interest to the Crees, identification of the forested areas presenting wildlife interest to them, consideration for the land use of the tallymen and their concerns about the realisation of the planned forest management activities (Schedule 3, sect. 2.2.).

Steps to take this FPDO significantly into consideration are as follows:

- 1) Identification and location of sites of interest, forested areas of wildlife interest and land use objectives related to the concerned traplines;
- 2) Identification, in consultation with the tallyman, of sectors that allow synergy in the implementation of the FPDO related to the conservation of biodiversity and the maintenance or improvement of wildlife habitats deemed important for the Crees;
- 3) Identification of harmonization measures with respect to the traditional Cree way of life and assurance that forestry management takes into consideration the protection of wildlife habitats;
- 4) Documentation and cartography of harmonization measures developed with the participation of the tallyman.

The first step must be completed in section 3.2.6. The second and fourth steps are carried out in sections 3.2.6 and 7.4. Step 3 occurs in sections 3.2.3 and 3.2.4.

#### Step 1 : Identification and location of sites of interest, forested areas presenting wildlife interest and objectives related to the way the concerned traplines are used

To ensure protection or appropriate use of sites of interest and wildlife habitats of particular interest to the Cree at the trapline scale, the location of sites or territories to be subjected to particular consideration during the forest planning must be known.

# Appendix 1

## Proposal for FPDO no 11

1. For every TRU subjected to forest management activities in the scope of the 2008-2013 plan, inform tallymen before the plan development process of territories considered in the forest planning. To facilitate participation of the tallyman in the identification of the objectives and sites of interest, supply a shapefile as well as a cartographical paper representation illustrating the topography, the waterways, the current and projected road networks, the 1 and 25 %, the disturbed sectors (cuts, natural disasters) and the large targeted sectors of intervention.
2. Agree, respecting a reasonable delay, on collaborative meetings with the concerned tallymen in order to share on the location and the use of sites of particular interest in these potential territories, most particularly in the forested areas of wildlife interest (25 %).
3. Present, in section « 3.2.6 Participation in the Elaboration of the General Forestry Management Plan (GFMP) » actions related to this step.

Step 2 : Identification of sectors of application of the FPDO regarding the conservation of biodiversity;

1. Identify the sectors that meet the FPDO guidelines related to the conservation of biodiversity in taking into consideration the objectives and sites or areas of interest identified by the tallyman;
2. Submit upon consultation with the tallyman the location of potential areas creating a synergy of wildlife-forest objectives;
3. Present in section « 3.2.6 Participation in the Elaboration of the General Forestry Management Plan (GFMP) », the synergy created between the objectives of biodiversity and the particular interest of the Crees.

Step 3 : Development of harmonization measures respecting the Cree traditional way of life and making sure that forest management takes into consideration the protection of wildlife habitats;

1. All along the plan preparation process, make sure there is cooperation between the tallyman and the agreement holders regarding the choice of location of residual forest blocks to be conserved in the forested areas of wildlife interest, of the road network development plan and in the identification of the harmonization measures aimed at preventing land use conflicts;
2. Agree on the harmonization measures

# Appendix 1

## Proposal for FPDO no 11

### Wildlife habitats of particular interest identified by the Crees and protection or development measures

For wildlife habitats of particular interest identified by the tallyman (bear, moose, marten, small game, beaver, wildfowl, riparian zones, fish, etc.), identify harmonization measures applied to ensure the protection or the development of these habitats.

To accomplish this step, consult the « guide for the elaboration of strategies for the protection and development of wildlife habitats », developed jointly with the Crees. Agreement holders can also, in cooperation with the tallyman and the MNRF, adjust proposed measures to take into account the topography of the sites or of any other condition requiring adjustments without jeopardising the conservation or the development of the specific wildlife habitat.

Include, in « section 3.2.4 Forest Management Strategy », the list of considered wildlife habitats and objectives as well as the harmonization measures agreed upon.

In cases where protection or development measures cover large areas (ex. woodland caribou, marten, and moose) measures will have to be considered in the five-year plan. Given the annual updating of location data of wildlife habitats, the exercise must afterwards be carried out for every AMFP. The application of measures covering small areas should have little or no impact on the 5-year program.

3. Identify and describe harmonization measures agreed upon in sections 3.2.3 and 3.2.4.

### Step 4 : Cartography and documentation of the harmonization measures produced with the participation of the tallyman.

Complete sections « 3.2.3 Harmonisation Measures » and « 3.2.6 Participation in the elaboration of the GFMP ».

## APPENDIX 2

### MAIN ITEMS OF ADJUSTMENT FOR THE CREE SECTION

*1. Adding a section: it may be inserted before the current section 3.2.3 Harmonization Measures*

#### 3.2.xxx Applying FPDOs to the Territory

The application of FPDOs must make it possible to optimize the agreed efforts to protect and develop the forest environment. In doing so, a synergy of actions must make it possible to simultaneously reach several objectives.

To ensure the localization of selected areas in regards to the objectives to be met for certain FPDOs take into consideration wildlife objectives and, more specifically for FPDO No. 4 (mature and old-growth forest), No. 7 (pre-commercial thinning) and No. 8 (conservation of deadwood), agreement holders should closely consult the tallyman on the potential territories that meet the MRNF guidelines.

Additional information to the report concerning the participation of the other users of the land (section 3.2.6) should describe the actions put forward to ensure agreement between the tallyman's objectives and those of the agreement holders.

Section 4.1.1.1 reaffirms that the objectives and modalities of the *Agreement concerning a new relationship between the Government of Québec and the Cree of Québec* should be integrated into the forest management strategies. Include all agreed upon actions and means to meet the targeted objectives.

*2.. Changes to the wording of the current section 3.2.4*

#### **3.2.4. FOREST MANAGEMENT STRATEGY**

Include all of the guidelines, directives and particular instructions needed to the elaboration of the management strategy included in the general forest management plans.

On a more specific manner, include directives relating to the protection and development of wildlife habitats that will make it possible to:

1. Ensure that biodiversity and sustainable ecosystems are maintained on the territory;

## APPENDIX 2

2. Integrate the Cree concerns and their traditional knowledge in the protection and development of wildlife habitats of particular interest for the Crees;
3. Ensure a real and meaningful participation of the Crees in the forest planning process.

To reach these objectives, the agreement holders should implement strategies to:

1. Identify, in close collaboration with the tallyman, the protection and development objectives for wildlife habitats and the localization of areas of interest for the Crees;
2. Ensure a participation and consultation process with the tallyman to develop a forest strategy;
3. Describe the harmonization measures that ensure the protection and development of wildlife habitats of interest for the Cree (Table No. 33).

In early 2006, the MRNF will publish a guide on developing strategies for the protection and development of wildlife habitats, for agreement holders and other users of the land in the Agreement territory. Identify in “Figure 19 – Location of sites of special interest and forest areas of wildlife interest” the areas being subjected to particular protection according to the directives relative to the protection and development of wildlife habitats.

*(Following the text on mixed forests)*

*3. Addition of a section at the end of section 3.2.x*

### 3.2. xxx INFORMATION CONFIDENTIALITY

During consultations with the other users of the land, other than the tallymen or the joint working groups, the agreement holder should consult the Confidentiality Agreement that was signed by both parties.



## Appendix 3

### **Partial list of items requiring joint and official interpretation by parties**

- Official basic parameters to establish the trapline portrait (area calculation for the 1 and 25 %; definition of perturbations to consider (ex. 40 % in the last 20 years);
- Application of articles 3.63 and 3.64 related to firewood –permanent camps ;
- Articles related to access;
- Consideration of Cree knowledge and preoccupations not included in the 1 and 25 % ;
- Articles related to protection of forest adjacent to river more than five (5) meters wide.

**WORKING DOCUMENT**

## **Appendix 4: Analysis of the instructions for the elaboration of the GFMP**

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# WORKING DOCUMENT: ANALYSIS OF INSTRUCTIONS FOR PREPARING THE GFMP

October 5, 2005

Sections	Sub-sections	Comments	Questions
INTRODUCTION		<p>The introduction to the instructions does not make any real references to the concepts of sustainable development or sustainable forest management.</p>	Sections of GFMP translated for whom? The GTC Cree? (ref.: section 3.44 of the Agreement)
1. Social and legal setting	1.1 Legal framework	<p>As the text should only be used by the beneficiaries, it does not make any direct reference to the concepts of sustainable development or sustainable forest management. The integration of preliminary provisions of the <i>Forestry Act</i> would be necessary in order to register, in practical terms, the instructions in a sustainable forest management setting.</p> <p>The Agreement should be presented in this section. The wording could be the following: <i>For the Territory of Application in Chapter 3 of the Agreement concerning a new relationship between the Government of Quebec and the Crees of Quebec, an adapted forestry regime applies. The adapted regime consists of specific provisions for preparing general forest management plans. These modalities are described in Section 2.2 of Appendix C4 of the Agreement. These modalities hold that general plans must include a Cree section and address the formulation, approval and any modifications to the plans.</i></p>	
	1.1.1 Content of the general forest management plan		
	1.1.2 Setting up a general forest management plan		What kind of involvement can we expect from the Crees in developing GFMPs?
	1.1.3 Approval for the general forest management plan		

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Sections	Sub-sections	Comments	Questions
	1.1.4 Modifications to the general forest management plan		
	1.1.5 Other constraints for contract beneficiaries	There is no reference to the dynamic plans proposed by the Coulombe Commission.	Is it possible to think that a transitional phase begins and these dynamic plans will be gradually integrated into the five-year and annual planning?
	1.2 Social setting		
	1.2.1 Milieu		
	1.2.2 Native communities		Does the Cree section wish to introduce additional elements into the instructions section?
	1.3 In-house policy for contract beneficiaries regarding the certification of forestry or other practices		
2. Description of the territory	2.1 Location of the forest management unit (UAF)		
	2.2 Description and use of the territory		
	2.2.1 Territorial reference unit (UTR)		
	2.2.2 Hydrographical network and water-related facilities		
	2.2.3 Existing infrastructures		
	2.2.4 Wildlife resources and uses		Is a specific contribution from the Cree section provided for in this section?
	2.2.5 Recreation and tourism		

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Sections	Sub-sections	Comments	Questions
	2.2.6 Historic and cultural sites		Is a specific contribution from the Cree section provided for in this section?
	2.2.7 Non-ligneous forest productions		
	2.2.8 Other specific elements		
	2.2.9 Cartography		
2.3 Biophysical characteristics of the forest	2.3.1 Capacity and content		
	2.3.2 Ecological surroundings of the territory		
	2.3.3 History of natural disturbances		
	2.3.4 History of completed forestry treatments		
	2.3.5 Sectors susceptible to Eastern spruce budworm		
	2.3.6 Cartography		
2.4 Assessment of the territory's forest management activities			
	2.4.1 Protecting the habitat of endangered species	The results for protecting the woodland caribou's habitat should be included in this section.	

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Sections	Sub-sections	Comments	Questions
	2.4.2 Protecting exceptional forest ecosystems		
	2.4.3 Remaining productive areas harvested		
	2.4.4 Areas harvested using regeneration cutting without rutting problems		
	2.4.5 Compliance of forest management activities with the RNI provisions whose purpose is to protect the quality of the water and fish habitat		
	2.4.6 Compliance of forest management activities with the RNI provisions whose purpose is to protect wildlife habitats other than for fish		
	2.4.7 Compliance of forest management activities with the RNI provisions that target the compatibility with the plan d'affectation du territoire public (PATP)		
	2.4.8 Compliance of commercial forestry operations (acceptable if cutting rights are paid) with the Department's acceptance standards		

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Sections	Sub-sections	Comments	Questions
	2.4.9 Compliance of non-commercial forestry treatments (acceptable if cutting rights are paid) with the Department's acceptance standards		
	2.4.10 Compliance with the performance standards in the <i>Manuel d'aménagement forestier</i>		
	2.4.11 Compliance of harvest volumes authorised by the annual forestry management permit (respect of forestry potential and allocation)		
	2.4.12 Compliance of forestry treatments provided for in the forest management strategy		
	2.4.13 Results from the progress report for the establishment and repair operations on the main infrastructures		
	2.4.14 Acquisition of ecoforestry data		
	2.5 Socioeconomic characteristics		
	2.5.1 Importance of private forests and forests in the domain of the State		
	2.5.2 Description of contract beneficiaries exploiting the forest management unit		

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Sections	Sub-sections	Comments	Questions
3. Aboriginal communities	3.1 All aboriginal communities		
	2.5.3 Workforce		
	3.1.1 Presentation of the agreement made with the native community	Does not apply to the Territory's beneficiaries.	
	3.1.2 Harmonization Measures described in the Agreement	Does this point apply to the Territory's beneficiaries?	
3.2 Cree Section		<p>As the paragraph should be reproduced in full by the beneficiaries in section 3.2, it does not make any reference to what is understood as "a traditional way of life."</p> <p>Suggested improvement:            In the 3<sup>rd</sup> paragraph, "The provisions in Chapter 3... The objectives of an adapted forestry regime target adaptations to better manage the Crees' traditional way of life, a greater..."</p>	



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Sections	Sub-sections	Comments	Questions
	<p>3.2.1 Identification of sites of special interest (1%) and forest sites of wildlife interest (25%) for each trapline</p>	<p>Responsibility of the MRNFP to make this information available. There is still confusion over the official basic parameters used to determine these areas. For many traplines, the work has not been completed or officialized.</p> <p>In Fig. 19, -location of areas of special interest and areas of wildlife interest: beneficiaries are asked to send the (cartography) files containing,</p> <ul style="list-style-type: none"> <li>• the 1 and 25% for each UTR</li> <li>• the areas under protection according to wildlife habitats</li> <li>• firewood cutting areas</li> </ul> <p>As provided for in section 3.46, the GTC is responsible for protecting the Cree tallyman's information.</p>	<p>The 1 and 25%: Does the MRNFP have a plan to complete and officialize these areas? For uncompleted areas, how should the beneficiary address the application of measures?</p> <p>Figure 19 Is the GTC able to ensure the confidentiality of the tallyman's information, "especially during the involvement of labour representatives as well as during the information and public consultation period" ???</p> <p>Should the representatives "equip" the GTC in order to guarantee this confidentiality??</p> <p>Should the instructions define the markers to be used for this data, especially during an information or public consultation period??</p>

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Sections	Sub-sections	Comments	Questions
	<p>3.2.2 Description of the "Modalities of the Adapted Forest Regime" as specified in Chapter 3 of the <i>Paix des braves</i></p>	<p>In the beginning of the section, it is mentioned that, "For the general description of the modalities for the adapted forestry regime, the beneficiaries must use the text below in its entirety." Many of the descriptions in various sections are incomplete in comparison to the Agreement's text or the wording is slightly different.</p> <p>Delimitation of UTRs – indicated that the beneficiary uses the UTRs identified in Dec. 2003</p> <p>In the section, "Conserving forest areas of wildlife interest for the Cree,"</p> <p>1<sup>st</sup> paragraph "This section targets... and the Crees' traditional activities <b>including</b> hunting, fishing and trapping."</p> <p>2<sup>nd</sup> paragraph, in reference to section 3.10.3</p> <p>"Within the selected areas, forest management activities will be planned with the priority goal of maintaining and improving a diversity of ecoforest stands."</p> <p>To maintain a forest cover</p> <p>Text incomplete, the content of sections 3.11.1 f, g and should be included in the description.</p> <p>There is no mention of section 3.12.1</p>	<p>Why only a partial description? Should the descriptions remain like this?</p> <p>Is this wording fine as it is considering the changes that were made to certain UTRs because of the exclusion of municipal territories (i.e.: O59)?</p>

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Sections	Sub-sections	Comments	Questions
	<p>3.2.X Proposal to add a FPDO section to the Cree section</p>	<p>See Appendix 2 for proposed text in this section</p>	
	<p>3.2.3 Harmonization Measures</p>	<p>The wording should be changed so that it is closer to the text in section 13 of Appendix C4 of the Agreement. The wording of the instructions should be clearer.</p> <p>The wording should be, “The beneficiaries and the Cree tallymen consult each other in regards to the harmonization measures. The purpose of this exercise is to have the Cree share their knowledge that would make it possible to identify all concerns other than...” (sec.13 section C4)</p>	
	<p>3.2.4 Forest management strategy</p>	<p>Text referred to</p> <ul style="list-style-type: none"> <li>• the use of “instructions relating to the protection and development of wildlife habitats”</li> <li>• as well as intervention objectives and modalities for mixed stands (Guide)</li> <li>• reference to Figure 19 – location of areas 1-25% and specific wildlife area (see previous comment regarding information confidentiality - sect. 3.2.1)</li> </ul> <p>See Appendix 2 for proposed text in this section</p>	<p>These instructions should be the result of an instruction project submitted by the CQFB and be subject to recommendations by the CQFB. Where is the government on this project?</p> <p>Where is the MRNFP on this project? Will the Guide be developed in co-operation with the CQFB? Will it be ready when the instructions are passed on?</p>
	<p>3.2.5 Employment and contracts</p>		<p>Is it necessary to include a reference to section 3.60 of the Agreement?</p>

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Sections	Sub-sections	Comments	Questions
	3.2.6 GFMP participation process	This section should be rephrased to reinforce the importance of the Crees' involvement. The following text should precede the paragraph of section 3.2.6: <i>“The Crees’ participation in the planning and management of the various forest management activities is one of the Agreement’s main objectives. The tallymen and beneficiaries should consult each other about the location of residual forest blocks for the road network development plan and the harmonization measures.”</i>	
	<b>3.2.X Proposal to add a section on the confidentiality of tallyman information</b>	<b>See Appendix 2 for proposed text in this section</b>	
4. Management objectives and strategy	4.1 Management objectives and strategy		
	4.1.1 Forest Protection and Development Objectives (FPDO)		
	4.1.1.1 Reducing rutting		
	4.1.1.2 Minimising the loss of productive forest area		
	4.1.1.3 Protecting the aquatic habitats by avoiding sediment input		
	<b>4.1.1.4 Permanently maintaining a quantity of mature and old-growth forests determined in accordance with the regional ecology</b>	FDPO very important in connection with wildlife habitats  <b>Currently, the descriptions do not make any reference to the importance of building synergy concerning the wildlife objectives (instruction project)</b>	<b>Should we suggest adding a section for this FPDO to the Cree section?</b>

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Sections	Sub-sections	Comments	Questions
	4.1.1.4.1 Identification of biological refuges	<ul style="list-style-type: none"> <li>2% per UAF, divided by the UTR with permanent integral protection and following these implantation guidelines</li> <li>excluding protected areas</li> <li>Beneficiaries submit proposals to the MRNFP</li> <li>Reserved sectors will go into consultation with the key labour representatives</li> </ul>	Connections to be made with the tallyman's areas special or wildlife interest
	Aging patches	Section omitted in the current version of Instructions 5 to 10% per UAF	
	4.1.1.4.2 Adapted forestry practices	For the sub bioclimatic domain of the western black spruce feathermoss stand, the objective is 7% (2.5% for the next GFMPs)	
	4.1.1.5 Developing and applying spatial distribution patterns for logging based on regional ecology and what is socially acceptable	N.A. for the Agreement territory	
	4.1.1.6 Protecting the habitats of threatened or vulnerable forest species	With the current wording (ministerial orientation #2003-16), no precautionary approach will be applied on the Agreement territory.  A precautionary approach to be applied on the Agreement territory should be registered under this FPDO	Does the MRNFP plan on integrating the proposal presented in the draft directives on wildlife habitats, concerning the woodland caribou?
	4.1.1.7 Supervising the pre-commercial thinning practice	<b>FPDO important in connection with wildlife habitats</b>	
	4.1.1.8 Conserving deadwood in managed forests	<b>FPDO important in connection with wildlife habitats</b> <b>Subtract 20% from riverbank surface areas for continuous forest operations</b>	

# WORKING DOCUMENT: ANALYSIS OF INSTRUCTIONS FOR PREPARING THE GFMP

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Sections	Sub-sections	Comments	Questions
	4.1.1.9 Maintaining the visual quality of landscapes in a forest environment	<ul style="list-style-type: none"> <li>Considering the criteria for the “sectors of major interest,” this FPDO will most likely have little impact on the territory</li> </ul>	
	4.1.1.10 Encouraging the harmonization of forest uses by signing written agreements that are in keeping with the general forest management plan	<p>Should add that:            “For the UAFs on the Agreement territory, harmonization of uses should be confined to the various sections of the Cree section (section 3.2).”</p>	
	4.1.1.11 Maintaining or improving the habitat of wildlife species that are important to the Cree and facilitating the harmonization of the territory’s various uses in order to encourage environmental conditions conducive to the pursuit of Cree traditional activities	<p>No text in the current version of the instructions.</p> <p>In accordance with the FPDO implementation document sent to the beneficiaries, the beneficiaries should, <u>“together with the GTC and the MRNFP, by October 2005, define the parameters that will be used to evaluate the reaching of objectives and their impact on the Crees’ traditional way of life.”</u></p> <p>To this day, nothing seems to have been done.</p> <p><b>See Appendix 1 for proposed text in this section</b></p>	<p>Are the GTC able to participate in defining the evaluation parameters for this objective?</p> <p>Who should study the instructions for applying this FPDO?</p>
4.2 Management scenarios		<ul style="list-style-type: none"> <li>Important section where the forest production objectives are translated into “forestry terms” -</li> <li>Information from potential calculation and produced by the MRNFP</li> </ul>	<p>When the management scenarios reserved for the Territory will have been submitted to the Cree representative, are they based on the potential calculation?</p>

# WORKING DOCUMENT: ANALYSIS OF INSTRUCTIONS FOR PREPARING THE GFMP

October 5, 2005

Sections	Sub-sections	Comments	Questions
5. Results of the forest potential calculations	5.1 Forest management	Based on the calculations per UAF while the measures are per UTR.  Connection with the “spatial” module for the potential calculation	<b>Has the calculation per UTR using the spatial module been taken into consideration?</b>  How will mixed stands be treated?
	5.2 Allowable cut and possible harvest volumes	<b>During summer 2006, beneficiaries will receive a file that graphically represents the “operational constraints” (description: Table 30) to be taken into consideration.</b>  These constraints are from the potential calculation	While acknowledging that they have not been integrated into the potential calculation, could more detailed information on the Cree allotments be included in this mailing?  Has the application of a precautionary approach to the allocation been planned?
	5.3 “Volumes conjoncturels”		
	5.4 Impact of recurring forest fires		
6. Harmonization Measures	6.1 FDPO “Landscapes”		
	6.2 FDPO “Agreements - Harmonization of uses”	In the Cree section, beneficiaries are asked to fill out Table 33 in Chapter 6 on the harmonization measures.	

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Sections	Sub-sections	Comments	Questions
7. Five-year Program	7.1 Forest management	There is no reference to the dynamic plans proposed by the Coulombe Commission.	Is it possible to think that a transitional phase begins and these dynamic plans will be gradually integrated?
	7.1.1 Planned silvicultural treatments		
	7.1.5 Harmonization Measures		
	7.1.5.1 FPDO "Landscapes"		
	7.1.8 Intervention substitution standard	Following the participation of the tallyman in the plan's development, the "adapted" intervention standards, whose purpose is to harmonize forestry intervention operations with the tallyman's interests, may be accepted. In this section, the harmonization measures, which differ from the intervention standards recommended by the government, may be presented (section 25.2 of the Forestry Act). Therefore, some of the measures proposed as part of the instruction project may be applied here, even though they differ from the RNI.	
	7.1.10 Analysis of the likelihood of rutting		
	7.1.11 Calculation of % of equivalent cutting area (ECA) for drainage basin		
	7.1.12 Stands left untouched for several rotations ( <i>flots de vieillissement</i> )		



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Sections	Sub-sections	Comments	Questions
	7.4 Cartography	Here again, reference is made to the location of territories of wildlife interest and residual blocks in parts of the territory (Fig. 19). How can we ensure the confidentiality of the information that these blocks may hold?	
	7.4.1 Silvicultural treatments in the five-year program	Section where the beneficiary must draw a map (Figure 24) of the harmonization measures agreed on with the tallyman.	Does this duplicate Figure 19 ‘Location of areas of special interest and areas of wildlife interest’ in sections 3.2.1 and 3.2.4 of the Cree section?
8. Implementation of the general forest management plan	8.1 Follow-up of the forest management strategy	FPDO 11 has not been integrated into the tables of ‘Forest management objectives and strategy for developing 2008-2013 GFMPs.’ Indicators to measure the reaching of objectives in connection with the Agreement must be defined. According to the initial FPDO text, the beneficiaries should, in co-operation with the MRNFP and GTC, propose parameters to evaluate the reaching of the Agreement’s objectives by October 15, 2005. It seems that, up until now, little has been done in this regard. For the last GFMPs, the JBACE, had formulated sustainable management criteria and indicators to be integrated into the GFMPs.	Which indicators will be subjected to a follow-up?  Will these indicators always be relevant?  Is it up to the beneficiaries to submit proposals?  What do the parties involved want as evaluation parameters?
	8.2 Methods for making decisions and resolving conflicts		
9. Knowledge to be acquired before drawing up the next general forest management plan		It is mentioned that the beneficiaries, the MRNFP and the key labour representatives determine the ecoforestry knowledge as well as any other information that the beneficiaries should have in order to prepare the next GFMPs.	Could a traditionally Cree process of acquiring knowledge be defined?
10. SIGNATURES			