



Québec, November 4, 2022

Minister Maïté Blanchette Vézina
Ministère des Ressources naturelles et des Forêts
Ministre responsable de la région du Bas-Saint-Laurent et de la région de la Gaspésie-Îles-de-la-Madeleine
5700, 4^e Avenue Ouest, bureau A-413
Québec (Québec) G1H 6R1

Subject: Preconsultation on the 2023-2028 tactical integrated forest management plans (PAFIT) for 15 management units (MU) in the Adapted Forestry Regime (AFR) territory – Comments of the Cree-Québec Forestry Board (Board)

Dear Minister,

In accordance with the processes defined in the Adapted Forestry Regime of the Agreement concerning a new relationship between the Gouvernement du Québec and the Crees of Québec (*the Agreement*) and in response to the request that the Ministry sent to us on August 18, 2022, the Board has carried out the analysis of the 2023-2028 PAFITs for all the management units forming part of the AFR territory. This review of the 2023-2028 tactical plans was conducted according to an analysis approach adopted by the Board members and focuses on the following elements:

1. Integration of the following key strategic files: Mixedwood Stands Management Strategy, Wildlife Habitat Management Directives and integration of the issues and solutions raised during the local integrated land and resource management panels (TLGIRT).
2. Consideration of the concerns expressed by the Crees.
3. Cree participation in the preparation of the PAFITs.
4. Incorporation of the recommendations made by the CQFB in its analysis of the plans for the preceding five-year period.
5. Verification of the new PAFIT format to ensure that it contains all the information required by the CQFB and all territory users to assess the achievement of the AFR objectives.

The detailed comments, findings and recommendations resulting from the review of the 2023-2028 PAFITs can be found in the attached analysis report. However, the Board members would like to bring to your attention some important findings resulting from this analysis.

Regarding the integration of the AFR major strategic files into the PAFITs 2023-2028, it should first be mentioned that the tabling and implementation of the Mixedwood Stands Management Strategy in February 2021 marked an important point in the application of the AFR. However, we note that some provisions of the Agreement could not be implemented into the 2023-2028 PAFITs.

The Wildlife Habitat Management Directives (*Directives*) provided for in the Agreement are mentioned in the 2023-2028 PAFITs on several occasions as being solutions to wildlife issues that have been raised by the Crees. However, these are still under development. In fact, by mutual agreement, the parties' authorities have agreed to postpone the deadline for this project to December 2023. In the Cree section of the PAFITs, the Ministry nevertheless offers an opening to put in place interim measures pending the finalization of the Directives.

With regards to the integration of local issues coming from the local integrated land and resource management panels (TLGIRT) in the 2023-2028 PAFITs, it is clear that the work of the concertation tables to agree on local issues has not been completed. We recall here that these panels were set up in compliance with the Sustainable Forest Development Act, the Agreement on Governance in the Eeyou Istchee James Bay territory and Schedule C-4 of the Agreement in order to ensure that the concerns and interests of all local users of the territory are taken into account. To do this, the users sitting at the table must agree and set local objectives for sustainable forest management. However, in spite of the establishment of these panels in 2017, no forest management issue or objective has yet been officially agreed upon by the TLGIRTs and integrated into the 2023-2028 PAFITs for the Nord-du-Québec region.

Regarding the taking into consideration Cree concerns in the PAFITs, it is important to highlight the effort made by the Ministry to consider them, even if they have not been formalized by the TLGIRTs according to the process provided for in Schedule C-4 of the Paix des Braves and detailed in the Sustainable Forest Development Act.

Moreover, consideration of the concerns expressed by the Crees during the TLGIRT meetings by the Ministry enabled the Crees to contribute to the development of the 2023-2028 PAFITs. Furthermore, the analysis of these PAFITs, which the joint working groups (JWGs) will do in pre-consultation, will be another opportunity for the Crees to officially contribute to their development.

Finally, the new presentation format of the tactical plans, in modular form, contains all the information required to enable the Board to properly review them before they come into force and to allow it to monitor the Agreement provisions. We also note that the new tactical plans format allows users to learn about the strategies that will be implemented in the territory over the next five years.

In light of these findings, the Board wishes to make two main recommendations to the parties' authorities:

Recommendation 1:

Considering the importance of the Wildlife Habitat Management Directives in responding to a number of issues, the Board recommends taking all the necessary measures to ensure adherence to the deadline agreed between the parties for the finalization of the Directives, that is, December 2023.

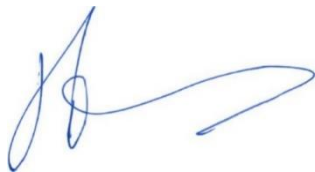
Recommendation 2:

Given that the entry into force of the 2023-2028 PAFITs is scheduled for April 1, 2023 and the deadline for finalizing the Directives is December 2023, the Board recommends implementing the interim measures mentioned in the Cree section, as would have been agreed between the parties, for the period April to December 2023.

Please be assured that the Board will continue to monitor the finalization and implementation of these tactical plans in accordance with its mandate and responsibilities. If necessary, we will send you new comments or recommendations. Please note that a copy of this letter will also be sent to the Grand Chief of the Cree Nation, Mandy Gull-Masty, for information.

In closing, on behalf of the Board members, allow me to take this opportunity to congratulate you on your appointment as Minister of Natural Resources and Forestry. I would like to assure you of our full availability to discuss with you, if you should so wish, the Adapted Forestry Regime in force on the Paix des Braves' territory.

Yours sincerely



Hervé Deschênes
Chairman

Enc. Report – Preliminary analysis of 2023-2028 PAFITs
c.c. Mandy Gull-Masty, Grand Chief of the Cree Nation



Introduction

On August 18, 2022, the Ministère des Forêts, de la Faune et des Parcs (MFFP) sent a request to the Cree-Québec Forestry Board (CQFB) to analyze the preliminary version of the 2023-2028 tactical integrated forest management plans (PAFITs) for 14 management units (MU) in the Nord-du-Québec administrative region and MU 084-62 in the Abitibi-Témiscamingue administrative region.

Under the Agreement (ANRCQ - Paix des Braves), the main functions of the CQFB are to allow for close consultation of the Crees during the different steps of planning and managing forest management activities in order to implement the Adapted Forestry Regime (AFR) (ANRCQ, 3.17). The CQFB is involved in the different processes for planning forest management activities in AFR territory. More specifically, it is responsible for reviewing the integrated forest management plans prior to their coming into force as well as proposed modifications to the plans (ANRCQ, 3.32 e). The PAFITs must be sent to the Joint Working Groups (JWGs) in each community concerned and to the CQFB, which ensures that they are processed in accordance with its mandate (C-4, section 8).

The MFFP prepared five (5) PAFITs covering AFR territory as a whole, i.e., one per Management Unit. The plans presented cover the following MUs:

- One PAFIT for MUs 026-61, 026-62, 026-63, 026-64, 026-65, 026-66 (Chibougamau Management Unit)
- One PAFIT for MU 084-62 (Mégiscane Management Unit)
- One PAFIT for MU 085-62 (Mont Plamondon Management Unit)
- One PAFIT for MUs 086-63, 086-64, 086-65, 086-66 (Harricana-Nord Management Unit)
- One PAFIT for MUs 087-62, 087-63, 087-64 (Quévillon Management Unit)

A Cree Section was prepared for each administrative region: one for the Nord-du-Québec (region 10) MUs and one for MU 084-62, located in Abitibi-Témiscamingue (region 08). The Cree Sections are confidential and are presented to the CQFB and JWGs in pre-consultation. These sections are not subject to public consultations and are not forwarded to the integrated land and resource management panels (TGIRTs).

The Secretariat analyzed the documents made available in a new format, which the MFFP had presented to CQFB members at a regular meeting. The new structure reorganizes the main sections of the PAFIT into four modules to limit unnecessary repetition of information that applies to the region as a whole. The new modules are as follows:

- Module 1: Legal and Administrative Context
- Module 2: The Territory and its Occupants
- Module 3: Analysis of the Issues
- Module 4: Tactical Integrated Forest Management Plan (PAFIT) for each of the five Management Units.

In the past, information common to all MUs was repeated in each PAFIT. Now, modules 1, 2 and 3 constitute a common core grouping together information for each administrative region.

Analysis approach

Just as they are for all forest environment users, the five-year PAFITs are sources of information that is essential for the CQFB. To properly fulfil its responsibilities, the CQFB requires comprehensive information on the five-year forest management goals, the issues at stake for forest users, the areas to be developed, the types of work to be carried out, the regulations and standards to be applied, the indicators for monitoring the work and the expected results. A great deal of this information is found in the PAFITs.

Inclusion of this information and the indicators for the tactical plans' intended targets is crucial for enabling the CQFB to fulfil its main responsibility of monitoring, analyzing and assessing the implementation of the provisions of Chapter 3 of the Agreement, which is aimed at implementing the AFR.

The specific analysis approach chosen for the 2023-2028 PAFITs was discussed and approved by the CQFB members at their May 31, 2022 meeting. They agreed that the analysis would focus on how specific elements linked to the AFR's implementation were integrated into the plans. These five elements¹ are:

- a) Integration of the following key strategic files: Mixedwood Stands Management Strategy, Wildlife Habitat Management Directives and integration of the issues and solutions raised during the integrated land and resource management panels (TGIRT);
- b) Consideration of the concerns expressed by the Crees;
- c) Cree participation in the PAFITs' preparation;
- d) Incorporation of the recommendations made by the CQFB in its analysis of the plans for the preceding five-year period;
- e) Verification of the new PAFIT format to ensure that it contains all of the information required by the CQFB and all territory users to assess achievement of the AFR objectives.

¹ *The first three elements chosen for the analysis were also analyzed in the five-year plans for the preceding period.*

The analysis report should allow the members to answer the following questions:

1. Do the PAFITs take all AFR provisions into account?
2. Have the Cree concerns been taken into consideration in the plans?
3. What was the Cree contribution throughout the PAFIT preparation process?
4. Were the CQFB's recommendations aimed at improving the 2018-2023 PAFITs taken into account in preparing the new PAFITs for 2023-2028?
5. Does the new PAFIT format enable users of the territory to better understand the PAFIT process and does it enable the CQFB to assess AFR implementation?

The PAFIT for the Chibougamau Management Unit (102), which groups together six (6) MUs in administrative region 10, was analyzed in depth. The content of this region's other plans underwent data verification. The PAFIT for Mégiscane Management Unit MU 084-62, located in region-08, was also analyzed in depth, given that this

MU presents several special features. However, the results of the analysis have been grouped together in each section of the report. Comments specific to MU 084-62 have been referenced in the report. The absence of reference to this MU indicates that the comments apply to the plans for both administrative regions.

a. Integration of key strategic AFR files

This section seeks, primarily, to verify whether three key strategic files have been taken into consideration in the 2023-2028 PAFITs and determine the intentions for implementing and monitoring them. This section will also present findings specific to MU 084-62.

Files:

- Mixedwood Stands Management Strategy
- Wildlife Habitat Management Directives
- Local issues raised during the TLGIRTs and TGIRs
- Findings specific to MU 084-62

In 2017, the MFFP announced an extension in the timeline for tabling the 2018-2023 PAFITs to give the parties more time to integrate these key files provided for in the AFR and to give the territory's stakeholders a further opportunity to help integrate local values and objectives into these plans.

In 2022, although these elements have not all been developed and implemented, they have all been integrated into the 2023-2028 PAFITs as seen below.

Mixedwood Stands Management Strategy

The Mixedwood Stands Management Strategy was officially implemented in 2021 and has been fully integrated into the 2023-2028 PAFITs. The Strategy is mentioned several times in the PAFIT's different modules, which clearly explain that mixedwood stands management in the MUs governed by the AFR concerned must be carried out in compliance with Mixedwood Stands Management Strategy targets. Although the indicators and targets are not specified in the PAFIT, a hyperlink is provided to access the Strategy itself and a summary of it, in which they are detailed.

Wildlife Habitat Management Directives

The Wildlife Habitat Management Directives are still being developed. They are mentioned numerous times in the PAFITs, which affirm that they constitute an eagerly awaited solution to many ecological issues. The PAFITs also point out that the pace of work on this file picked up once the Mixedwood Stands Management Strategy was finalized. The Directives were expected before April 1, 2018, but the timeline has already been extended several times since then. The new deadline for the final tabling of the Directives, agreed to by the two parties to the Agreement, is December 2023. This is clearly indicated in the 2023-2028 PAFITs.

Local issues raised during the TGIRTs for category II and III Lands

Nord-du-Québec region

Appendix B, Module 4 of the 2023-2028 PAFITs contains tables presenting a summary of the local issues and objectives officially raised during the various TGIRTs on Category III lands. This information comes from the Eeyou Istchee James Bay Regional Government, the entity in charge of TLGIRT management for Category III lands for the Nord-du-Québec region. As for category II lands, the CNG has presented to the TGIR the same 4 Cree issues at that have been tabled to all the AFR's TLGIRT on category III lands.

We can see that:

- The issues and objectives are practically identical to those presented in the modified PAFITs for the preceding period;
- The issues and objectives tabled by the Cree for this part of the territory have been included;
- None of these local issues raised by the Category II and III lands TGIRTs has been integrated into the section describing local issues in PAFIT Module 3 or 4, where they should be found with the solutions selected;
- The MFFP has, nevertheless, included in the PAFITs many other "concerns" expressed by the Crees during consultation and collaboration meetings. These concerns and how they are taken into consideration in the PAFITs are presented in detail in Section b (below), which addresses the Cree concerns included in the Cree section of the PAFITs.

Since identification of local issues via the TLGIRTs and TGIRs is information of vital importance for preparing the PAFITs, one might wonder about the contribution expected from these official platforms for dialogue and collaboration involving the territory's users.

In their 2018-2023 PAFIT analysis report, the JWG's reiterated the importance of the TLGIRTs in the tactical planning process, pointing out that these platforms are not sufficiently used by the communities' Cree representatives and that it would be important to remind the Cree stakeholders called to sit on the TGIRTs of the panels' mandates and the importance of participating.

Abitibi Témiscamisque region (MU 084-62)

MU 084-62 is located outside Agreement on Governance in the Eeyou Istchee James Bay territory. The Vallée-de-l'Or RCM manages this MU's TLGIRT, which has designated a seat for the Waswanipi Crees. This seat is still unoccupied. Seats are also reserved for representatives of other Indigenous communities (Algonquin and Attikamekw) frequenting the management unit.

The main steps leading to determining solutions to the issues raised by the TLGIRT members have been described. Considerable information has been included on the implementation process. The PAFIT specifies that the TLGIRT and Indigenous communities have been working for many years to define and register their different concerns in the form of issues. The main steps leading to determining solutions to the issues are:

- 1) Draw up a list of the concerns identified by its members, then classify them by theme and by order of priority.
- 2) Document the prioritized concerns to determine if they raise real issues.

3) Look for solutions for these issues and transmit the recommendations, including the related documentation, to the Direction régionale.

The integrated local issues raised during the TLGIRTs found in the 2023-2028 PAFIT for MU 084-62 are:

- Maintenance of the visual quality of the landscapes and the development potential of recreation tourism and vacation sectors;
- Maintenance of marten trapping activities on the scale of the trapline.

Findings specific to MU 084-62

Official recognition of sites of interest

- Although the Cree Section of the PAFIT presents sites of interest to the Cree (1% and 25%) determined by the Cree representatives, we note that designation of these sites is not always official. For the time being, these territories are taken into consideration in the special Paix des Braves planning procedures through tactical harmonization. Their definitive location is also always subject to discussions with the territory's other Indigenous users. The MFFP has reminded the CNG of this legal requirement. According to the PAFIT, there has been no follow-up for the time being.

Second "pass" of mosaic cutting

- One of the important factors in this MU is the second "pass" of mosaic cutting and no mention is made in the PAFIT.

b. Cree concerns expressed in the Cree Section of PAFITs

In the Cree Sections of both PAFITs, Table 1 lists all of the concerns and issues expressed by the Crees and specifies when they were raised: primarily the 2016 Wildlife Workshop, the VOITs¹ prepared by the CNG and presented at the Category II land (TGIR) and Category III land (TLGIRT) panels in 2018, and the concerns presented by the community of Waswanipi at its Category III lands TLGIRT.

It is pointed out that the Cree concerns and issues presented in the 2023-2028 PAFITs are the same as those that were presented in the 2018-2023 PAFITs, whose most recent version dates from 2020. Given the short lapse of time since then, they were considered still valid and were integrated into the 2023-2028 PAFITs' Cree Sections, which also mention that no new concern or issue have since been raised.

Table 1 summarizes the concerns and issues received, indicating the forest management objective associated with them and the module and section of the 2023-2028 PAFITs in which the information can be found.

In the PAFIT for MU 084-62, Table 1 is also presented in the Cree section. For each concern or issue, the references to the sections of the document remain the same as well as the forest management objectives associated with them. However, only the concerns and issues applicable to this management unit are included. For the same issue, the same solution applies, be it for the Nord-du-Québec region or MU 084-62 in Abitibi-Témiscamingue. Indicators and targets may vary slightly from one region to the other, depending on the forest's special features. Only cases specific to MU 084-62 have been included in the Table presented.

Our table, which follows, contains every concern and issue raised by the Crees and contained in Table 1 of each region's Cree Section. It summarizes the relevant information found in these tables and we have added a Comments section for each concern and issue to indicate the CQFB's observations and recommendations.

Concerns expressed by the Cree	2023-2028 PAFIT content referring to the issue and solutions chosen (Table 1, Cree Section)
<p>Woodland caribou Manage woodland caribou habitat while, avoiding, as far as possible, road construction and harvest operations. [TGIR and TLGIRT – Cree Nation Government, Workshop]</p> <p>Have a woodland caribou recovery plan ready in 2018 on Waswanipi territory. This new plan should include the latest scientific knowledge and traditional knowledge, and establish thresholds to maintain and restore the woodland caribou habitat. [TLGIRT – Cree First Nation of Waswanipi]</p>	<p>Module 2 – The Territory and its Occupants</p> <ul style="list-style-type: none"> • Protected Land or Sites to which Special Conditions Apply This section contains explanations regarding protected areas and the different types of legal protection that can apply in the territory. Maps show the location of protected areas and sites to which special conditions apply for the Nord-du-Québec region. <u>Lands subject to interim measures associated with the caribou are not shown in the maps presented.</u> • Species Designated or Likely to be Designated as Threatened or Vulnerable (TVLS) and Table 5 This section discusses the <i>Act respecting threatened or vulnerable species</i>, which is under the joint responsibility of the MFFP and the MELCC. A number of legal provisions exist to protect the designated species and their habitats. In Table 5, we can see that the woodland caribou is included in the list of TVLS present in Nord-du-Québec territory and that the species is designated “vulnerable” by the province of Québec and “threatened” by Canada. <u>However, according to Table 5, the woodland caribou is not covered by a TVS agreement or protective measure and there is no legally protected caribou habitat.</u> • Woodland Caribou and Gaspésie Mountain Caribou This section discusses the caribou recovery plan currently being prepared, the caribou's special needs and threats to its habitat. We learn the following: <ul style="list-style-type: none"> — The main threat comes from habitat disturbances generated by anthropogenic activities and the resulting increase in predation. — Forest management creates adverse habitat conditions for caribou, which are closely dependent on mature forests. — The deployment of the road network also affects the caribou and its habitat.

¹ The “VOITs” are now called “Issues and Solutions”.

- The precautionary approach implemented in 2013 and the measures added in 2019 will be maintained pending finalization of the provincial strategy.
- The precautionary approach and interim measures are to protect sensitive areas for the conservation or restoration of woodland caribou habitat, where harvesting, construction or road improvement activities are prohibited.
- Maps showing the location of large forest tracts currently protected by the precautionary approach and interim measures are not shown in the PAFIT, but a hyperlink to this map is provided.

All of the elements targeted by the MFFP's Woodland and Mountain Caribou Strategy are addressed in this section.

- **Wildlife Resources**

This section reports on the wildlife populations targeted by hunting, fishing and trapping. The main species harvested in the region are listed. The woodland caribou is described as an emblematic species of special importance for the First Nations. The five (5) woodland caribou herds that use the Nord-du-Québec region are named and the sections states that the woodland caribou is the focus of a provincial issue. No details are provided on woodland caribou harvesting.

Module 3 – Analysis of the Issues

- **Table 6 - Potential for Exclusions in Maintenance and Recruitment of Old-Growth Forests**

Table 6 is in the section on the Forest Age Structure issue, whose objective is to ensure that managed forests resemble natural forests where age structure is concerned. Just as for each ecological issue, three types of solutions are envisaged:

- Adapted silvicultural treatments
- Spatial and temporal distribution of interventions
- Exclusion of areas from harvesting.

Excluding portions of the forest from planning allows timely production of ecological processes and allows attributes of natural old-growth stands to develop and perpetuate over time. Table 6 shows the potential for exclusions in maintenance and recruitment of old-growth forests. This potential corresponds to the abundance of mature forests excluded from forest management planning in each MU. The table's footnote indicates that the areas associated with caribou protection forest stands are included in this potential.

- **Invasion by Ericaceous Plants**

This section points out that, in certain forest types, cutting creates conditions favourable to invasion by ericaceous plants, a phenomenon that delays forest growth by about 25 years, thus affecting harvesting and allowable cut. A specific management strategy is envisaged for forest stations where this problem is likely to occur. The goal is to ensure that yield is maintained in forest stands subject to invasion by ericaceous plants. A certain type of forest station (RE12), with high potential for invasion by ericaceous plants and associated with caribou lichen (cladonia) forest stands, constitutes essential caribou winter habitat. This type of cladonia stand is protected under the Regulation respecting the Sustainable Development of Forests (RSDF, RADF in French) when located in an area governed by the caribou recovery plan. All forest interventions are prohibited here and these areas are excluded from allowable cut by regulation. In this specific case, we note that the Caribou issue takes precedence over the Invasion by Ericaceous Plants issue.

- **Main Infrastructures and Access Roads**

Access road management is discussed in this section. The caribou is mentioned as an essential value to be considered when preparing and implementing the Access Road Management Plan proposed by the MFFP. Caribou habitat is to be increasingly taken into consideration in managing and developing the road network. The Road Access Management Plan is still being prepared within the MFFP and will necessitate the collaboration of other government departments and land users. The Plan will prioritize the territory covered by the Woodland and Mountain Caribou Strategy, but no timeline is mentioned.

Module 4 – Tactical Integrated Forest Management Plan (PAFIT)

- **Table 1 – Summary of Forest Management Objectives by Issue**

The objectives, indicators and targets for the Woodland Caribou issue are shown in this table. The objective is: Contribute to the recovery of woodland caribou by applying forest planning conditions that favour maintenance of appropriate habitats. The indicator is the "rate of compliance with the conditions provided for the woodland caribou habitat" and the target is 100%.

- **Table 2 – Synergies Between the Issues According to the Selected Solutions**

Table 2 takes the same issues as Table 1 and associates them with the different solutions that can be used to achieve the management objectives. It shows the synergies that can apply to simultaneously address several issues. For woodland caribou, specifically, we note that the means envisaged are exclusion, spatial distribution and roads.

- **Table 7 – Spatial and Temporal Conditions**

The Cree Section cites this table as a place the PAFIT addresses the subject of caribou. However, this table is missing. Table 7 is in the section on economic profitability and concerns the classification of economic indicator values.

- **Section 2.2.5: Infrastructures and Main Roads to Develop and Maintain**

This section is actually numbered 2.4.5 in Module 4 of the PAFIT. It presents maps of each MU on which the main infrastructures and roads to be maintained have been indicated. However, this is no specific reference to caribou in this section of the document.

- **Table 18 – Community Values Associated with the Access Road Network and Forest Management Objectives Related to These Values**

This table is actually identified as Table 17, Module 4. It lists all of the values to take into consideration in developing an access road management plan. Maintaining the woodland caribou habitat is one of these community values. The general forest management objective associated with it is: A forest road network of limited extent in the woodland caribou habitat, which limits fragmentation of habitats and the disturbance rate. The entire section on the access road management plan is the same as in Module 3. No new information is provided in this section.

- **2.1 Wildlife Habitat Management Guidelines**

The word “Guidelines” seems to be the new term used for the Directives in English. However, the word “Directives” is still used in the Cree Section. This section recalls that, once they are finished, the Guidelines will aim to introduce strategies into the forest management planning process that take into account the protection and development of wildlife habitats. The caribou is not specifically mentioned in this section of the PAFIT, but is referred to in section 3.10.1 of the AFR, which names species of importance to the Cree. The Directives are being developed for species of importance to the Cree and the caribou is one such species.

- **Issues and Solutions Sheet 1.07.1 – Sensitive Species**

The objective for the Sensitive Species issue is: To consider the habitat needs of sensitive species in the forest management process in order to ensure that their needs are considered and that management targets and solutions are adapted accordingly. The caribou is a specie sensitive to forest management in this Issues and Solutions Sheet but also has its own specific Sheet.

- **Issues and Solutions Sheet 1.07.2 – Woodland Caribou**

This Issues and Solutions Sheet contains a short description of the woodland caribou and the factors explaining the decline of woodland caribou populations. The caribou-related objective is shown in the Sheet, which also contains details on indicators and targets to measure achievement of the objective. The Sheet then lists the strategies chosen to meet this objective and the expected effects of each.

1. The precautionary approach for woodland caribou implemented in 2013 for the Nottaway, Assinica and Témiscamie populations targets large forest tracts of strategic importance for the caribou and protects them until the management plans for these three caribou populations are implemented. (Solution: exclusion)
2. Transitory measures, implemented in 2019, which defer forest activities in sectors of key importance for the conservation or restoration of woodland caribou habitat, while waiting for implementation of the Woodland and Mountain Caribou Strategy. (Solution: exclusion)
3. Protected areas, biological refuges and exceptional forest ecosystems help protect old-growth forests, which are important for the caribou. (Solution: exclusion)
4. Targeted degree of alteration by TAU. The Issues and Solutions Sheet recalls that every management unit is divided into territorial analysis units (TAUs). For each TAU, targets have been established for old-growth forests and the maximum quantity of regenerating forests. These restrictions on forest age force rotations to become longer and help ensure that old-growth forests are distributed throughout the MU. (Solution: spatial and temporal distribution of interventions)
5. Clearing-cleaning. It is pointed out that clearing-cleaning to avoid invasion by hardwood species in certain sectors helps preserve softwood cover. We can assume that this is why this strategy is cited in this Issues and Solutions Sheet since preserving a softwood cover means maintaining a caribou-friendly habitat. (Solution: adapted silvicultural treatments).

Results are presented for recent years (between 2013 and 2019) and show a 100% rate of compliance with the measures envisaged.

Comments, findings and observations

In the Cree Section of the PAFIT, the table of concerns expressed by the Cree (Table 1) lists all of the places where the subject of caribou is addressed in the PAFIT’s different modules. The caribou-related content from these sections is reported above and in our table. The Caribou issue is probably the one for which there are the most references to different sections of the PAFIT. By reviewing the relevant content in the above-mentioned sections, we can see that many of these sections simply mention the caribou; others do not mention it at all.

The Cree’s woodland caribou-related goals are: Manage woodland caribou habitat while avoiding, as far as possible, road construction and harvest operations; and have a woodland caribou recovery plan that includes the latest scientific knowledge and traditional knowledge, and establish thresholds to maintain and restore the woodland caribou habitat.

The measures currently in place, i.e. completely excluding sectors recognized as important caribou habitats, respond to the first Caribou issue goal expressed by the Cree.

As for the second goal, we will need to wait for the adoption of the Woodland and mountain caribou Strategy to ensure that its content is likely to respond to the goal in question, notably by including traditional Cree knowledge.

Concerns expressed by the Cree	2023-2028 PAFIT content referring to the issue
<p>Road network Impacts of the road network and management of access roads (including road closure) [Workshop]</p> <p>Limit road network expansion and reduce its redundancy [TGIR and TLGIRT – Cree Nation Government]</p> <p>Establish an access road management plan that facilitates natural resources development while also reducing environmental impacts, and that includes appropriate practices for adapting to climate change and extreme weather conditions [TLGIRT – Cree First Nation of Waswanipi]</p>	<p>Module 3 –Analysis of the Issues</p> <ul style="list-style-type: none"> • Main Infrastructures and Access Roads The road network is not treated as an issue in the PAFIT but as a solution that contributes to several ecological issues. This section specifies that management of access roads is a key factor for reduction of the environmental impacts associated with forest management, pointing out that developing and implementing the Access Road Management Plan is a colossal task that requires the endorsement of all partners and taking users’ values into account. A detailed action plan was written up to specify the approach for preparing and implementing the Access Road Management Plan. It calls on the TLGIRTS to identify roads to be kept based on uses and road closing opportunities. <u>This section is the same as that presented in the 2018-2023 PAFIT.</u> • Table 24 – Community Values Associated with the Access Road Network and Forest Management Objectives Related to These Values Table 24 presents all of the values to take into consideration in preparing an access road management plan. These local values were identified following discussions at the TLGIRTS and also during various consultations of users of the territory. <u>It specifies that the PAFIT pre-consultation exercise is an opportunity for the MFFP to add values and/or refine management objectives.</u> <p>Module 4 – Tactical Integrated Forest Management Plan (PAFIT)</p> <ul style="list-style-type: none"> • Table 2 – Synergies Between the Issues According to the Selected Solutions <u>Table 2 shows that access roads (simply called “roads” in the table) are among the solutions envisaged for wildlife issues, water quality and timber production.</u> • 2.2.5: Main Infrastructures and Roads This section is actually numbered 2.4.5 in Module 4 of the PAFIT. It presents maps of each MU on which the main infrastructures and roads to be maintained have been indicated. This strategic road network allows the forestry industry to harvest timber resources and allows other users from the community to access the forest to carry out their activities. This section presents the Access Road Management Plan, the approach to take to prepare and implement it and the values to take into consideration. <u>It specifies that the main infrastructures and roads to be developed and maintained were sited in collaboration with the different forest environment stakeholders.</u> <p>Management unit 084-62 With regard to the road network, the PAFIT for MU 084-62 specifies that region 08 is awaiting the results of development of the Nord-du-Québec Access Road Management Plan before beginning a similar process.</p> <p>Access road management is a solution that applies only to Timber Production issues, the objectives being access to forests for harvesting and financial profitability.</p> <p>Unlike the region 10 PAFIT, access road management is not discussed in terms of ecological issues or consideration of local values.</p> <p>Comments, findings and observations</p> <p>When we compare a reading of the 2018-2023 PAFITs for the Road Network issue with the new PAFIT presented for 2023-2028, we are forced to admit that the situation does not seem to have evolved. Both PAFITs show that access road management is important on several levels, for both the Cree and for the area’s other users. The Access Road Management Plan is mentioned as a solution for many of the concerns expressed by the Cree, especially as regards wildlife issues. Further efforts are expected in order to prepare and implement such a plan.</p>
Concerns expressed by the Cree	2023-2028 PAFIT content referring to the issue
<p>Non-commercial silvicultural works Intensive forest management and non-commercial silvicultural works impact wildlife habitats (marten, hare) [Workshop]</p> <p>Tree planting and non-commercial silvicultural operations may cause changes in composition [Workshop]</p>	<p>Module 3 – Analysis of the Issues</p> <ul style="list-style-type: none"> • Internal Structure This section explains that in natural forests, as time passes, disturbances create stands whose internal structure is increasingly complex. Forests with high structural diversity support a greater variety of species or functional groups. The objectives pursued for the Internal Structure issue are: <ul style="list-style-type: none"> – Ensure that internal stand structure resembles that of natural forests on the landscape scale – Ensure the maintenance of key structural complexity attributes on the cutover scale. <p>We learn that, following clearcutting, tending/training treatments are often used to manage stand composition and quality. However, applying these treatments on a large scale could have impacts on biodiversity. Internal stand structure influences the availability of species’ feeding, breeding and shelter sites. <u>Tending/training treatments have temporary adverse effects on wildlife habitat quality. If habitat conditions are no longer conducive to maintaining certain animal species, these species leave the environment. Treated stands become interesting to small wildlife only five years after an intervention.</u></p>

	<ul style="list-style-type: none"> • Simplification of Young Stands This section tells us that, once regenerated, the second-growth forest has attributes, such as a dense shrub substratum, a protective cover and an abundance of food beneficial to certain wildlife species. To prevent the risk of stand standardization resulting from clearcutting, it is necessary to avoid creating situations where recent tending/training treatments would be applied to more than 50% of young strata. A strategy of spreading treatments over time is envisaged to ensure the availability of suitable habitats and to avoid standardizing all young stands in the short term. <u><i>This section indicates that pre-commercial thinning would have a greater effect on standardization of second-growth forest and that application of this treatment has been gradually reduced in favour of practices with fewer impacts, such as clearing-cleaning.</i></u> • Regional Timber Production Strategy This Strategy relies on a forest management approach based on improving the characteristics of trees in order to better meet the needs of industry and markets, as well as increasing the quantity of timber available, harvested and processed. The combination of these two elements defines the value of the wood available for harvesting. <u><i>Various silvicultural treatments and non-commercial silvicultural work can be applied to influence these two factors, which define timber value.</i></u> The Strategy presents the assessment of the areas having undergone silvicultural investments in the territory, which shows the efforts deployed for the establishment of quality regeneration. <u><i>However, we note that some of the work has not achieved the targets, notably commercial thinning and various stand tending/training work.</i></u> <p>Module 4 – Tactical Integrated Forest Management Plan (PAFIT)</p> <ul style="list-style-type: none"> • Table 1 – Summary of Forest Management Objectives by Issue Table 1 supplies more details about the Internal Structure issue. One of the specific objectives of this issue is: to limit simplification of the internal structure of second-growth stands. The indicator chosen to measure whether the objective has been achieved is that the 10-to-25-year area that has received tending/training treatment in the past five years must not exceed 50%. The target is set at less than 100% of units of analysis (6000-ha hexagon) that comply with the rate of 50% or less. • Table 2 – Synergies Between the Issues According to the Selected Solutions Non-commercial silvicultural work is one of the means used to promote achievement of sustainable forest management objectives. Table 2 shows that land preparation and tending/training treatment are among the solutions envisaged for many of the issues, notably age structure, vegetation composition, internal structure and timber production issues. • Adapted Silvicultural Treatments Three types of solutions are indicated: exclusion, spatial and temporal distribution and adapted silvicultural treatments. Table 2 specifies that non-commercial silvicultural treatments belong to the “adapted silvicultural treatments” category. • Table 6 – Stand Tending/Training Treatments Examples of different non-commercial silvicultural treatments (NCST) and their uses, by issue, are detailed in Table 6. They are: land preparation, uniform planting, fill planting, clearing-cleaning and pre-commercial thinning. • 2.1 Wildlife Habitat Management Guidelines <u><i>NCSTs are not mentioned as such in this section,</i></u> but we can assume that silvicultural work will be prescribed in certain cases to maintain wildlife habitat quality. • Issues and Solutions Sheet 1.04.1 – Young Forest Structure and Composition (issue) / Limiting internal structure simplification in young second-growth stands (objective) This Sheet sets out the problem before specifying the strategies chosen and anticipated effects, which are as follows: <ol style="list-style-type: none"> 1. Limit the percentage of tending/training treatments in young stands 2. Adapt tending/training treatments to protect, in particular, fruit trees 3. Harmonize the distribution of stand tending/training treatments according to need so as to foster continued use (such as small game hunting and trapping). The results are then presented for the indicator linked to the proportion of young forests that underwent tending/training treatment in the past 5 years. <u><i>The target is achieved in 100% of cases (measured in 2013, 2017 and 2019).</i></u> <p>Comments, findings and observations</p> <p>Non-commercial silvicultural treatments are among the types of solutions to consider to meet the sustainable forest management objectives set.</p> <p>In the relevant content indicated in the Cree Section and reported here, we note special attention to maintaining quality wildlife habitats over time and throughout the territory as a whole.</p>
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	<p>We can hope that, eventually, through the Wildlife Habitat Management Guidelines and/or the above-mentioned Strategy 3, exclusion of certain NCSTs on specific sites, as requested by the Cree users, will be among the solutions proposed, e.g. pre-commercial thinning in the 25%; no scarification near watercourses; no reforestation likely to change stand composition.</p> <p>The fact that silvicultural work can be used to solve forests' vegetation composition problems in order to promote or reduce the presence of a given tree species, among other things, is cause for concern. For example, the silvicultural strategy aimed at countering invasion by hardwood species could change vegetation composition and, thereby generate changes in the wildlife habitats present in the territory. However, the Mixedwood Stands Management Strategy limits major changes in vegetation composition since its goal is to maintain a historic ratio of mature mixed stands and to ensure recruitment. In the MUs on AFR territory, the Mixedwood Stands Management Strategy will take precedence over the strategy aimed at countering invasion by hardwood species.</p>
<p>Concerns expressed by the Cree</p>	<p>2023-2028 PAFIT content referring to the issue</p>
<p>Riparian zones (Connectivity, moose, bear habitat)</p> <p>Importance of riparian environments as a wildlife habitat [Workshop]</p> <p>Maintain connectivity and riparian zones (value: moose) [TGIR and TLGIRT – Cree Nation Government]</p>	<p>Module 3 – Analysis of the Issues</p> <ul style="list-style-type: none"> Riparian Environments <p>This section provides explanations on the ecological functions of wetlands and riparian environments and the positive impact of preserving them as wildlife habitats for greater diversity of species of importance to the Cree. It states that:</p> <ul style="list-style-type: none"> A riparian environment is a transition zone between terrestrial and aquatic ecosystems. It represents an essential or sought-after habitat for more than 50% of fauna and some species depend on it to complete one or more stages of their life cycle. Studies show that maintaining riparian strips of uniform width without disturbing the soil adequately ensures protection of the water's physicochemical conditions. <i>The section also specifies that these measures may prove insufficient for certain specific ecological functions, such as the wildlife habitat function.</i> Regulations currently in effect ensure riparian environments of basic protection against forest management practices likely to compromise their integrity. This is the 20-m protective strip bordering permanently flowing watercourses and conserving sensitive wildlife habitats like heronries, muskrat habitat, mudflats, spawning areas, etc. Other types of solutions seek to maintain or restore the ecological functions of riparian environments. We are referring to the Paix des braves provisions concerning the protection of forests adjacent to watercourses, exclusion of certain parts of the riparian environment (protected areas, operational constraints) and spatial and temporal distribution of harvesting. <p>The objectives pursued regarding riparian environments are described: Ensure the preservation of rare types of natural communities and a representative share of riparian diversity. <i>The recommendations made in this section target a 15% minimum threshold of complete protection of productive riparian zones as well as an overall threshold of 30% of the territory subject to special measures in all riparian environments.</i></p> <ul style="list-style-type: none"> Wetlands <p>The Wetlands issue is complementary to the Riparian Environments issue since the objectives set for the protection of wetlands also help protect certain riparian environments. A reading of this section shows:</p> <ul style="list-style-type: none"> Compared to the 2018-2023 PAFIT, progress has been made on analysis of the types of management and protection applied in wetlands and has permitted recommending a new objective and defining indicators and targets for this issue. The objective pursued for wetlands is: Ensure that sufficient protections are in place to see to the maintenance of the ecological functions of high-value wetlands and isolated wetlands. The solutions proposed target primarily the exclusion of a share of wetlands from planning. In fact, it is recommended that these more vulnerable or remarkable wetlands could be recognized as "wetlands of interest" (WLI). It is specified that this designation corresponds to a new protected area status specially designed to preserve wetlands of interest. <p>The indicators associated with the Wetlands issue are based on one of the following benchmarks:</p> <ul style="list-style-type: none"> A maximum of 1% of the area of the territory must be covered by sites proposed as wetlands of interest to ensure that at least 1% of the baseline territory presents measures allowing protection of wetlands (protected areas and other administrative protection measures included); <p>or</p> <ul style="list-style-type: none"> Wetlands of interest combined with wetlands included in protected areas or other protective measures represent at least 12% of the total area of wetlands in the territory. <p>Finally, the results of the analyses linked to these indicators are presented and show the MUs for which wetland protection is already sufficient and the MUs for which new protections, by determining wetlands of interest, could be applied.</p> <p>Module 4 – Tactical Integrated Forest Management Plan (PAFIT)</p> <ul style="list-style-type: none"> Table 1 – Summary of Forest Management Objectives by Issue <p>Table 1 presents the indicators and targets chosen for each issue to meet the objective set. For riparian environments, the objective is: Preserve the rare types of natural communities and a representative portion of</p>

	<p>riparian diversity. The indicator is: Area of the completely protected riparian environment and the target is >15%. <u>However, there is no mention of the 30% where special measures could apply, as recommended in Module 3.</u> For wetlands, the objective is: See to the maintenance of the ecological function of high-value wetlands and isolated wetlands. The wetland indicators and targets are the same as those presented in Module 3.</p> <ul style="list-style-type: none"> • Table 2 – Synergies Between the Issues According to the Selected Solutions We can see that the solutions proposed for riparian environments and wetlands are similar: exclusion, spatial distribution and partial cut. <u>It is surprising not to see “roads” as a solution to these issues, given the significant impacts of access road management on aquatic and riparian environments.</u> Table 2 shows that this type of solution has, instead, been associated with the Water Quality issue. • Table 3 – Exclusion Types Table 3 presents all of the types of exclusion that can apply in the territory and the legal protections they enjoy. Additional areas can be granted administrative protection due to their special interest or their sensitivity to certain issues. <u>More specifically, Table 3 refers to prioritized wetlands of interest, the new designation that will protect additional areas of rare or isolated wetlands to be prioritized.</u> • 2.1 Wildlife Habitat Management Guidelines The Guidelines aim to integrate wildlife issues into the forest management planning process in order to protect and develop wildlife habitats. The Guidelines are still being developed and the deadline for finalizing them is now December 31, 2023. <u>This section does not refer to wetlands or riparian environments,</u> but refers to Issues and Solutions Sheet 1.07.1 for more details. • Issues and Solutions Sheet 1.07.1 – Considering Sensitive Species Habitat Needs in Forest Management <u>The Wetlands and Riparian Environments issues are not discussed here apart from the mention that maintenance of wetlands and riparian environments is also advantageous for sensitive species.</u> • Issues and Solutions Sheet 1.08.1 – Wetlands This Sheet recalls the ecological functions of wetlands and wetlands’ importance. It also specifies wetland-related objectives, indicators and targets. The main strategy chosen is additional protection for wetlands (exclusion). For MUs where less than 12% of wetlands are protected (less than 1% of the MU’s total area), wetland protection needs to be improved. In these cases, the aim is to increase the area of the wetlands protected by 1%. For MUs that fall short of the 12% protected wetlands target, the first action consists in identifying additional wetlands to protect based on their high conservation value. These sites will then be excluded from forest management planning. <u>It is indicated that the timeline for WLI identification is April 2023.</u> • Issues and Solutions Sheet 1.08.2 –Riparian Environments This Sheet recalls riparian environments’ ecological functions and importance, notably for wildlife. The objective indicated in the Sheet is: Diversify management of riparian environments. <u>This objective differs from the objective indicated in Table 1, Module 4:</u> Preserve the rare types of natural communities and a representative portion of riparian diversity. According to the Sheet, the three strategies chosen are: <ol style="list-style-type: none"> 1. Diversify the management of riparian areas 2. Development and implementation of wildlife habitat directives 3. Protection of riparian forests (Paix des Braves). <u>Table 1, Module 4 indicates a >15% target of complete protection for riparian environments for each MU. However, this does not appear in this Issues and Solutions Sheet.</u> <p><u>Management unit 084-62</u></p> <p>In Module 3, the objectives for riparian areas and wetlands are the same as for region 10. In Module 4, however, the PAFIT for MU 084-62 differs since Table 1 contains no indicators or targets.</p> <p>However, region 08 is further ahead in its analysis of wetlands of interest (WLI) to protect. Explanations have been provided on wetland characterization and selection for WLI status based on conservation value, based on the following factors: rarity, extent, diversity, habitat quality and ecological services provided.</p> <p>The criteria selected are discussed extensively and a profile of wetlands has been produced for each of the region’s MUs. The wetlands of interest had already been selected and added to the PAFITs in 2018-2023. They remain and no further additions are foreseen for 2023-2028.</p> <p>The Abitibi-Témiscamingue PAFIT does not refer to Issues and Solutions Sheets in the Ecological Issues. All solutions are discussed. Each one is described and information is provided on how it contributes to each issue, whereas the Issues and Solutions Sheets for region 10 do the opposite.</p>
	<p>Comments, findings and observations</p> <p>The Wetlands and Riparian Environments issues were being analyzed when the 2018-2023 PAFITs were tabled. Reading of the new, 2023-2028 PAFIT shows that progress has been made on these analyses since targets and indicators have been determined for these issues.</p>

	<p>However, on reading the Issues and Solutions Sheets, we note that the information they contain differs from the PAFIT. It would be useful to check to ensure that all sections of the PAFIT contain up-to-date information.</p> <p>Since, to a great extent, consideration of this issue depends on implementation of the Wildlife Habitat Management Guidelines, it is hard to say whether this Cree concern has been taken into account as long as the Guidelines' content is unavailable for analysis.</p>
<p>Concerns expressed by the Cree</p>	<p>2023-2028 PAFIT content referring to the issue</p>
<p>Mixedwood stands Mixed stands management for moose and marten [Workshop]</p> <p>Maintain hardwood and mixed stands (value: moose) [TGIR and TLGIRT — Cree Nation Government, TLGIRT — JWG]</p>	<p>Module 3 –Analysis of the Issues</p> <ul style="list-style-type: none"> Ecological Issues - Vegetation composition <p>Vegetation composition refers to the diversity and relative proportion of tree species on both the stand and landscape scales. The objective pursued with regard to vegetation composition of managed forests is to bring it closer to that of the natural forest. This section contains a good deal of information on mixedwood stands:</p> <ul style="list-style-type: none"> In the natural forest, forest composition is shaped by the interaction of different factors, such as soil type, climate and the disturbance regime specific to each territory. For example, following a disturbance, shade-intolerant species are usually the first to be established and then are gradually replaced by shade-tolerant species (natural succession). In managed forests, logging operations are added to natural disturbances and, unless management is carried out following harvesting, the proportion of shade-intolerant species, often hardwoods, can increase. Selective harvesting can also lead to the increasing rarity of certain species, often softwoods. Invasion by or rarity of certain species is likely to have impacts on the maintenance of biodiversity and ecological processes. For this issue, analysis of the level of alteration of the vegetation cover of managed forests compared with natural forests is needed to determine species of concern. Following these analyses, species whose proportion we wish to increase (promote) are determined for each MU as well as species whose proportion we wish to reduce (control). In the region, we often see invasion by hardwood species such as paper birch and trembling aspen. Tending/training treatments aimed at countering invasion by hardwood species are recommended in a number of MUs. However, for those located on AFR territory, it is also specified that, in accordance with the Mixedwood Stands Management Strategy, management and recruitment of mature mixedwood stands must also be carried out. <i>We can assume that this means that the Mixedwood Stands Management Strategy takes precedence over strategies aimed at countering invasion by hardwood species in the MUs in question.</i> <p>Module 4 – Tactical Integrated Forest Management Plan (PAFIT)</p> <ul style="list-style-type: none"> Table 1 – Summary of Forest Management Objectives by Issue <i>Table 1 contains no reference to mixedwood stands.</i> Table 15 – Distribution of Sylvicultural Work Areas of the Forest Development Strategy 2023-2028 Period <i>Table 15 does not mention the Mixedwood Stands Management Strategy either.</i> 2.2 Mixedwood Stands Management Strategy <p>This section refers to the Strategy's development in accordance with Paix des Braves requirements. The objectives are also stated:</p> <ul style="list-style-type: none"> Maintain and recruit mature mixedwood stands Keep diverse and dense young mixedwood stands at all times Optimize development of the forest resource associated with mixedwood stands. <p>Indicators and targets are not detailed in this section, but a hyperlink to the unabridged Mixedwood Stands Management Strategy is provided.</p> <ul style="list-style-type: none"> Issues and Solutions Sheet 1.07.1 –Considering Sensitive Species Habitat Needs in Forest Management <i>Implementation of the Mixedwood Stands Management Strategy is among the solutions proposed to take sensitive species' needs into account in the forest management process.</i> <p><u>Management unit 084-62</u></p> <p>Vegetation composition differs somewhat for MU 084-62, which belongs to the paper birch fir stand (85%) and spruce-moss stand (15%) bioclimatic domains. The Nord-du-Québec MUs covered by the AFR are 100% spruce-moss stands. Mixedwood stands are not as rare as in the AFR's other MUs.</p> <p>The objectives for the Age Structure and Vegetation Composition issues are the same as for region 10 but the targets and indicators may differ to reflect the forest composition's special features in this region.</p> <p>Vegetation Composition issue</p> <p>No cover-related issue has been raised for this MU. The quantity of hardwood and mixed cover has decreased since the 2000s and softwood-dominated covers have tended to increase.</p>

	<p>The PAFIT mentions that, in accordance with the Mixedwood Stands Management Strategy arising from the Paix des Braves' AFR, management and recruitment of mature mixedwood stands will have to be carried out. MU 084-62 has a great many stations conducive to maintaining this type of stand. This management seeks essentially to maintain the Cree traditional way of life.</p> <p>Reforestation efforts to maintain and increase the representativeness of white spruce in the landscape and the mixedwood of mixed stands will be maintained. Station families conducive to its survival are present in MU 084-62 and will be targeted as a priority during reforestation.</p> <p>Ccomments, findings and observations</p> <p>Development of the Mixedwood Stands Management Strategy was completed during the period 2018-2023. The Strategy was implemented at the end of the period, as specified in the last PAFIT (2018-2023), which mentioned that the Strategy would be applied as soon as it is ready, without waiting for the next five-year period.</p> <p>The Strategy, developed by the MFFP in close collaboration with the CNG, was analyzed by the CQFB and meets the objective of maintaining quality wildlife habitats.</p> <p>Stands of importance were identified by the tallymen over the past year, as agreed on.</p> <p>Monitoring the Strategy's implementation remains to be carried out both in terms of its application in compliance with the thresholds determined and its degree of effectiveness for maintaining and recruiting mixedwood stands.</p>
<p>Concerns expressed by the Cree</p>	<p>2023-2028 PAFIT content referring to the issue</p>
<p>Fish habitat Protect spawning areas during construction of water crossings [Workshop] Protect spawning areas (value: fish habitat) [TGIR and TLGIRT – Cree Nation Government] Ensure fish conservation [TLGIRT—Cree First Nation of Waswanipi and JWG]</p>	<p>Module 2 – The Territory and its Occupants</p> <ul style="list-style-type: none"> Wildlife Resources The Wildlife Resources section gives a socioeconomic portrait of hunting, fishing and trapping activities in the Nord-du-Québec region, pointing out that, with the help of wildlife management plans prepared, the MFFP controls and monitors these activities to ensure the sustainability of fish populations. <i>This resource's importance for the Cree communities is mentioned several times in this section.</i> <p>Module 3 – Analysis of the Issues</p> <ul style="list-style-type: none"> Ecological Issues – Riparian Environments The section on Riparian Environments informs us about the importance of preserving riparian environments to ensure maintenance of the quality of aquatic habitats. This section explains that by regulating forest management practices and maintaining a 20-m protective strip, with uniform width and without disturbing the soil, it is possible to ensure water quality by preserving adequate physicochemical conditions, notably for fish. Local Issues – Main Infrastructures and Access Roads, Access Road Management Plan Main infrastructures and access roads, more specifically development of the Access Road Management Plan, are discussed in the Local Issues section, which explains that management of access roads is a solution that helps reduce environmental impacts. <i>The section specifies that the forest road network influences water and fish habitat quality but does not elaborate any further.</i> Table 24 – Community Values Associated with the Access Road Network and Forest Management Objectives Related to These Values Table 24 shows that the Cree are not the only ones concerned about fish habitat. Resulting from TLGIRT discussions, Table 24 shows community values associated with the access road network; three of these values are closely linked to fish habitat. <ul style="list-style-type: none"> Fish habitat Protection of spawning grounds Water quality. <p>Module 4 – Tactical Integrated Forest Management Plan (PAFIT)</p> <ul style="list-style-type: none"> Table 1 – Summary of Forest Management Objectives by Issue For the Wildlife Habitats issue, Table 1 refers to three Issues and Solutions Sheets found in the Appendix. <ul style="list-style-type: none"> Sheet 1.05.1 – Increasing Rarity of Naturally-Disturbed Forest Attributes Sheet 1.07.2 – Considering Sensitive Species Habitat Needs in Forest Management Sheet 3.02.2 – Water Quality and Aquatic Ecosystem Integrity. <i>Sheets 1.05.1 and 1.07.2 provide very little information on the approach the MFFP uses to protect fish habitat.</i> Issues and Solutions Sheet 3.02.2 - Water Quality and Aquatic Ecosystem Integrity This Sheet points out that the road network is the main anthropic cause of degradation of aquatic habitats due to soil erosion and the sediment inflows it causes. The Sheet also presents the four strategies chosen by the MFFP to help protect fish habitat: <ol style="list-style-type: none"> Inclusion of newly identified spawning grounds in forest plans

	<ol style="list-style-type: none"> 2. Apply RADF/SFDR watercourse standards 3. Analysis of management plans by Direction de la gestion de la faune biologists and wildlife technicians 4. Development and implementation of wildlife habitat directives. <ul style="list-style-type: none"> • Infrastructures and Main Roads to Develop and Maintain This section of Module 4 contains a series of maps of the main road infrastructures in the Nord-du-Québec region. It mentions that management of access roads is a key factor for reduction of environmental impacts on water quality and fish habitat. The MFFP's long-term goal is to prepare an access road management plan for the territory as a whole that takes users' values and management objectives into account. • Table 18 – Community Values Associated with the Access Road Network and Forest Management Objectives Related to These Values Table 17 (the actual number in the PAFIT) presents these values resulting from TLGIRT discussions. The end of the section contains information on the MFFP action plan for preparation of the Access Road Management Plan. <u><i>This is Table 17 in the PAFIT not Table 18.</i></u> • 2.1 Wildlife Habitat Management Guidelines This section deals specifically with joint MFFP-CNG development of the Wildlife Habitat Management Guidelines. The deadline for finalizing the Guidelines is December 31, 2023. A production calendar is also found at the end of Issues and Solutions Sheet 1.07.1, which is in the Appendix. Fish are not mentioned in this section of the PAFIT, but reference is made to section 3.10.1 of the AFR, which names species of importance to the Cree. <u><i>The Guidelines are being developed specifically for species of importance to the Cree and fish are among them.</i></u> <p><u>Cree Section of the Tactical Integrated Forest Management Plan 2023-2028</u></p> <ul style="list-style-type: none"> • Protecting Fish Habitat This part of the Cree Section provides more information on taking Cree fish habitat-related concerns into consideration. It discusses the fine-filter approach, in which spawning areas are targeted as wildlife sites of interest (SFI), and the coarse-filter approach, which considers species that are sensitive to forest management, designated focal or umbrella species. The section also reiterates that the Wildlife Habitat Management Guidelines will address protection of spawning grounds, especially those that have been identified and validated. <p>Comments, findings and observations</p> <p>Cree concerns regarding fish habitat seem to be duly taken into consideration in the 2023-2028 PAFIT: uninterrupted protective strips at least 20 m wide are maintained and road network forest management practices limit watercourse sedimentation. Identification and protection of spawning areas identified by the tallymen and consideration of fish habitat in preparing wildlife Directives also contribute to better protecting fish habitat.</p>
<p>Concerns expressed by the Cree</p>	<p>2023-2028 PAFIT content referring to the issue</p>
<p>Wildlife habitats Ensure wildlife resources sustainability [TLGIRT – JWG] Modify the application of mosaic cutting in forest areas of wildlife interest to the Cree (25%) through implementation of Wildlife Habitat Management Guidelines [TLGIRT – Cree First Nation of Waswanipi] Maintain hardwood and mixed stands (value: moose) [TGIR and TLGIRT – Cree Nation Government and TLGIRT – JWG] Maintain habitat connectivity and riparian zones (value: moose) [TGIR and TLGIRT – Cree Nation Government]</p>	<p><u>Module 2 – The Territory and its Occupants</u></p> <ul style="list-style-type: none"> • Protected Land or Sites to which Special Conditions Apply The end of this section provides hyperlinks to interactive maps of protected areas and wildlife habitats that are excluded from forest management planning. The map of protected areas shows the size of Québec wildlife reserves. The wildlife habitats map provides GPS coordinates of biological refuge projects excluded from forest management planning, designated biological refuges and exceptional forest ecosystems. <u><i>Note that the hyperlinks for protected areas and wildlife habitats are inverted.</i></u> • Species Designated or Likely to be Designated as Threatened or Vulnerable (TVLS) and Table 5 These two sections inform us about the legal context surrounding the different protective measures that apply to TVLS habitats (for wildlife and plant life). They also present a three-stage approach to actions implemented by the Québec government to ensure adequate TVLS protection. The legal context, protective measures and actions implemented help ensure wildlife resources sustainability. Table 5 in this section contains the list of wildlife and plant life TVLS present in Nord-du-Québec territory. • Woodland Caribou and Gaspésie Mountain Caribou This section has already been discussed in detail in our table since the caribou is a Cree concern. • Wildlife Resources The MFFP's mission includes the conservation and development of wildlife species and their habitats. This section points out how the MFFP uses management plans to control and monitor these activities to ensure the sustainability of terrestrial wildlife populations. This section also gives a socioeconomic portrait of hunting, fishing and trapping activities in the Nord-du-Québec region. <u><i>The importance of wildlife resources for the Cree communities is mentioned several times in this section.</i></u>

Module 3 – Analysis of the Issues

- Access Road Management Plan

Setting up a road network to serve a given territory necessarily has environmental impacts. The MFFP intends to reduce these impacts through an *Access Road Management Plan* organized around values of the public and the MFFP's partners. Table 24 presents the regional values resulting from TLGIRT discussions, consultation and harmonization meetings, and some are closely linked to wildlife habitats (fish habitat, protection of spawning grounds, water quality, maintenance of woodland caribou habitat, traditional way of life). According to its action plan, the MFFP will integrate these wildlife values into the preparation and implementation of its Access Road Management Plan.

Module 4 – Tactical Integrated Forest Management Plan (PAFIT)

- Table 1 – Summary of Forest Management Objectives by Issue; Issues and Solutions Sheets for the Nord-du-Québec region

Table 1 presents the Wildlife Habitats issue and its associated objective: Consider the habitat needs of the species sensitive to forest management. It also refers us to the following Issues and Solutions Sheets:

- Sheet 1.05.1, whose objective is: To ensure the maintenance of attributes specific to naturally-disturbed forests (forest fires, windfall, etc.) in order to preserve biodiversity at broader landscape level and in areas covered by special management plans.
- Sheet 1.07.1, whose objective is: To consider the habitat needs of sensitive species in the forest management process in order to ensure that their needs are considered and that management targets and solutions are adapted accordingly.
- Sheet 3.02.2, whose objective is: To protect fish habitats in general and spawning grounds in particular.

These Issues and Solutions Sheets are all linked to maintaining quality wildlife habitats and list sustainable development strategies implemented for the purpose.

- 2.1 Wildlife Habitat Management Guidelines

The Directives/Guidelines aim to introduce strategies into the forest management planning process to take the protection and development of wildlife habitats into account. They will cover the habitats of species of importance to the Cree identified in the AFR and will provide a guide to assist managers and JWGs in maintaining critical wildlife habitats in the developed territory.

Cree Section of the Tactical Integrated Forest Management Plan 2023-2028

- Progress of Work Relating to the Schedule C-3 C) and D) of the ANRQC – Wildlife Habitat Management Directives

The Cree Section mentions that the Directives will integrate scientific knowledge and Cree traditional ecological knowledge. Because of the extension of the timeline for finalizing the Directives announced recently, the CNG proposed to the MFFP that the 2023-2028 PAFIT incorporate interim measures until development of the Directives is finished, in December 2023. This request is currently being analyzed by the MFFP and discussions between the parties could modify the content of this section. According to the MFFP, these Directives will respond to Cree concerns raised regarding wildlife habitats.

Management unit 084-62

The Abitibi-Témiscamingue administrative region has seven (7) different types of wildlife sites of interest (SFI):

- Bald eagle nests
- Known spawning grounds
- Catchment areas of lakes inhabited by lake trout
- Small white-tailed deer yards
- Peregrine falcon habitat
- Catchment areas of sensitive lakes inhabited by brook trout
- Site identified as a wildlife habitat before regulatory designation

For the time being, the only known SFIs in region 10 are spawning grounds.

One of the local issues for MU 084-62 is maintaining suitable habitats for species that are sensitive to fragmentation and lack of connectivity. The effects of fragmentation and habitat loss on wildlife species are described along with the importance of connectivity. The objectives, indicators and targets for this issue have been determined in reference to marten, a focal species that lives in the interior forest and that is sensitive to fragmentation and lack of connectivity. The PAFIT specifies that the mosaic cutting conducted in MU 084-62 does not promote the creation of forest tracts and closed forests conducive to marten.

Comments, findings and observations

	<p>The sections of the modular PAFIT addressing solutions implemented that are discussed in the Cree Section are all linked to wildlife habitats. Many of the Cree concerns regarding forest management are related to wildlife, as shown in our table. The parties are relying heavily on implementation of the Wildlife Habitat Management Guidelines to respond to the majority of these concerns.</p> <p>The Wildlife Habitat Management Guidelines file is one of the key strategic files monitored on an ongoing basis by the CQFB. Therefore, it is crucial that additional resources be allocated to the Guidelines' preparation and that the December 31, 2023 deadline be respected.</p>
Concerns expressed by the Cree	2023-2028 PAFIT content referring to the issue
<p>Use of CLUMs during the planning process Incorporate into forest planning consideration of users' values and needs [TLGIRT – Cree First Nation of Waswanipi]</p>	<p><u>Module 4 – Tactical Integrated Forest Management Plan (PAFIT)</u></p> <ul style="list-style-type: none"> 2.1 Wildlife Habitat Management Guidelines <p>The table of concerns expressed by the Cree (Table 1, Cree section) mentions that once the Directives are in effect, CLUM (Cree Land Use Maps) data will be considered benchmarks for integrating Cree wildlife values. <i>However, we note that the CLUM are not mentioned in the Wildlife Habitat Management Guidelines section of Module 4, or in the Issues and Solutions Sheet referred to there.</i></p> <p><u>Cree Section of the Tactical Integrated Forest Management Plan 2023-2028</u></p> <ul style="list-style-type: none"> Cree Land Use Maps (CLUM): A Tool Developed to Support Consultation on Forest Planning <p>The Cree Section informs us about the tallymen consultation exercise organized by the CNG and JWG in 2012 and 2013, which led to the CLUMs. It points out that the CLUMs are a tool developed to support consultations on forest planning since they provide a profile of land use by the Cree. This information is superimposed on the forest planning maps presented to the tallymen during consultations, thereby resulting in greater consideration of Cree land uses by the MFFP in its planning. <i>The CNG is currently revising the CLUMs because land use evolves.</i></p>
	Comments, findings and observations
	<p>The table of concerns expressed by the Cree (Table 1, Cree Section) mentions a PAFIO checklist. It would be interesting to develop the content of this checklist. For example, since the CLUMs are superimposed on planned cutting blocks, does the MFFP systematically initiate a discussion with the tallyman to take his wildlife interests into consideration? More details on use of the CLUMs could be presented in the PAFIT, especially with regard to implementation of the Wildlife Habitat Management Guidelines.</p>
Concerns expressed by the Cree	2023-2028 PAFIT content referring to the issue
<p>Modification of the Northern limit for timber allocation Modify the northern limit of commercial boreal forest [TLGIRT – Cree First Nation of Waswanipi]</p>	<p><u>Module 2 – The Territory and its Occupants</u></p> <ul style="list-style-type: none"> Protected Land or Sites to which Special Conditions Apply <p>The table of concerns expressed by the Cree (Table 1, Cree Section) indicates this section in the references for modification of the northern limit of the commercial boreal forest. <i>However, this subsection does not address the subject.</i> The only mention of the northern limit in Module 2 is in the subsection "Area in which forest development activities are carried out" which states: "The public forest consists in the area of forest under provincial jurisdiction, located south of the northern limit for timber allocations, which may be developed". <i>However, it is possible to see stretches of the northern limit on certain maps presented in this section, although it is not officially indicated.</i></p> <p><u>Cree Section of the Tactical Integrated Forest Management Plan 2023-2028</u></p> <ul style="list-style-type: none"> Concerns Not Related to Management Objectives <p>This section specifies that the northern limit of commercial forests was reviewed in 2016 in response to the recommendations formulated in the report tabled in 2013 by the scientific committee responsible for revising the northern limit. <i>This modification did not affect AFR territory. Should the need arise to change the limit again, the CNG would have to be consulted first, as stipulated in section 3.8.2 of the Paix des Braves.</i></p>
	Comments, findings and observations
	<p>The description of the Cree concern regarding the northern limit does not provide sufficient information to understand Cree wishes with regard to the Northern Limit issue.</p>
Concerns expressed by the Cree	2023-2028 PAFIT content referring to the issue
<p>Mishigamish protected area Ensure total protection of Mishigamish protected area under the <i>Natural Heritage Conservation Act</i> [TLGIRT – Cree First Nation of Waswanipi]</p>	<p><u>Module 2 – The Territory and its Occupants</u></p> <ul style="list-style-type: none"> Protected Land or Sites to which Special Conditions Apply <p>In this section, we learn that protected area protection is governed by the <i>Natural Heritage Conservation Act</i>. A hyperlink to the Register of Protected Areas is included via which users can access an interactive map of protected areas. On consulting the map, we can see the administrative boundaries of <i>Réserve de territoire aux fins d'aire protégée Mishigamish</i> (No. 166 697), which spans 95 900 hectares on the edges of the Broadback River and Lake</p>

	<p>Evans. This section also mentions that protected areas whose boundaries have been acknowledged by the Québec government are excluded from forest management activities and specifies that this file falls under MELCC responsibility, without providing any further information.</p>
	<p>Comments, findings and observations</p> <p>The boundaries of Mishigamish shown on the interactive protected area map do not seem to cover the entire area proposed by the community of Waswanipi (according to map accompanying the July 2015 proposal).</p>

c. Cree participation in the PAFITs’ preparation

The Cree Section of the PAFITs reports on all opportunities for Cree involvement in and consultation regarding PAFIT preparation activities. A retrospective review of the activities linked to the 2018-2023 PAFITs is followed by a presentation of the steps taken to promote Cree participation in the 2023-2028 strategic planning process.

Among others, we see:

- Finalization of the work surrounding the Mixedwood Stands Management Strategy.
- Efforts made to develop the Wildlife Habitat Management Directives.
- Pre-consultations of the tallymen regarding the 2023-2028 PAFIOs, implemented following the conclusions of the CQFB’s Diagnostic Project.
- The Chief Forester’s presentation of the results of the preliminary allowable cut calculations at a CQFB meeting.
- Holding of a meeting to discuss the Regional Wood Production Strategy aimed at getting the CNG’s comments. Presentations on this strategy were also given to the TGIRTs and the CQFB.
- Holding of information sessions on preparation of the 2023-2028 PAFITs, in particular the new format, to the TGIRTs, CQFB and JBACE.

The observation made during the latest 2018-2023 PAFIT review remains valid for 2023-2028, namely, that these opportunities seem more like information sessions than activities aimed at getting Cree input on the PAFITs.

We know that input from the Cree for the 2023-2028 five-year period will be made available following the current PAFIT pre-consultation because, in addition to the CQFB, the JWG members have been asked to comment on this preliminary version of the 2023-2028 PAFITs and are currently conducting their own analyses. We will have to wait for the end of the pre-consultation phase to integrate this input into the Board’s analysis.

d. Consideration of the observations made in the analysis of the modified 2018-2023 PAFITs

In February 2020, the CQFB reviewed the 2018-2023 PAFITs, making observations and recommendations. In keeping with its role, it prioritized the following three aspects, or broad themes, linked to implementation of the Adapted Forestry Regime (AFR):

- Integration of the following key strategic files: Wildlife Habitat Management Directives, Mixedwood Stands Management Strategy and integration of the Issues and Solutions raised during the integrated land and resource management panels (TGIRTs)
- Consideration, in the PAFITs, of the concerns expressed by the Crees
- Cree participation in the PAFITs' preparation.

With this in mind, the 2023-2028 PAFIT analysis framework, approved at the May 31, 2022 CQFB meeting, looks at these three aspects to validate whether the observations made in 2020 have been taken into account.

1. Integration of the key strategic files into the 2023-2028 PAFITs

The CQFB's observation dating from 2020 was that integration of these key strategic files was not yet completed. The following is an update on the progress made on these three files according to the information contained in the 2023-2028 PAFITs.

In the latest version of the 2018-2023 PAFITs, the anticipated implementation of the Mixedwood Stands Management Strategy being prepared was integrated as a tactical harmonization measure applicable to all AFR management units. Since that time, the Mixedwood Stands Management Strategy was completed and officially published in February 2021. This Strategy is mentioned many times in the PAFITs and it is easy to access the electronic version using the hyperlink provided in Module 4 of each PAFIT.

The Wildlife Habitat Management Directives are still not in place, just as they were not when the 2018-2023 PAFITs were last analyzed. The 2023-2028 PAFITs are clear that the Minister must, in close collaboration with the CNG, implement these Directives. The new deadline agreed to by both parties is now December 31, 2023. However, the MFFP is open to implementing certain interim measures proposed by the CNG in June 2022 as soon as the 2023-2028 PAFITs come into force. This would ensure that a certain proportion of important wildlife habitats are maintained on each trapline, even in the absence of the final Directives. It is mentioned that these interim measures are currently being analyzed by the MFFP.

With regard to integration of the local issues raised during the Nord-du-Québec region TGIRTs governed by the AFR, the latest version of the 2023-2028 PAFITs is at the same point as its predecessor in 2020. Apart from the issues proposed by the Crees, the Nord-du-Québec region 2023-2028 PAFITs do not officially include any issue raised during the TLGIRTs. How the TLGIRTs' operate in theory is discussed as well as the participation of representatives of the territory's users. The panels determining the issues raised during TLGIRT discussions are also presented in the appendix but no issue seems to have reached the "official" stage. These tables provided by the Eeyou Istchee James Bay Government are presented in the PAFIT's appendix without context. The Cree concerns expressed during these TLGIRTs have been reported in the PAFITs' Cree Section along with the ways to take them into consideration despite the fact that the TGIRTs' work is not yet finished, as we will see in the next section of this report.

For MU 084-62, the TLGIRT process has made much more headway. An entire section of the PAFIT reports on Vallée-de-l'Or TLGIRT operations and on its work. The Vallée-de-l'Or RCM is in charge of managing this TLGIRT. Some of the Issues and Solutions raised during this TLGIRT have been integrated into the PAFIT in the "Local Issues" section:

- Maintenance of the visual quality of the landscapes and the development potential of recreation tourism and vacation sectors;
- Maintenance of marten trapping activities on the scale of the trapline.

The Waswanipi Crees' participation on this panel was sought via a request made to the community's chief, but this request remains unanswered for the time being.

2. Consideration, in the 2023-2028 PAFITs, of the concerns expressed by the Crees

Generally speaking, the PAFITs show a real effort by the MFFP to take the concerns expressed by the Crees into account, particularly through Table 1 of the Cree Section, where all of the concerns reported by the Crees are listed along with the references to the different PAFIT sections where they are discussed. It is important to note, however, that there has been no addition to this list since 2020. The concerns expressed by the Crees included in the 2023-2028 PAFITs are exactly the same as those reported in the 2018-2023 PAFITs. These Cree concerns and issues need to be updated.

When the modified 2018-2023 PAFITs were analyzed in 2020, the CQFB had highlighted the fact that certain specific concerns might not have been taken into consideration to the Crees' satisfaction. This was especially true of elements linked to the Wildlife Habitat Protection issue and certain non-commercial silvicultural work.

Wildlife habitat protection

In 2020, the CQFB made the following comments with regard to wildlife habitat protection:

- There are currently few concrete solutions for protecting wildlife habitats because these issues refer to various strategies that are still being developed. Only fish are a species of importance to the Crees for which specific habitat preservation measures are already envisaged.
- In terms of protecting riparian environments, strategies are still in the development phase (on the scale of Québec and within the Wildlife Habitat Management Directives).
- Links must still be made between the Directives and minimizing the impacts of forestry operations on watercourses, since the directives are still being developed and few details on this subject have been developed in the current PAFITs.
- We found nothing on connectivity between wildlife habitats, on the importance of having interconnected residual forest blocks or on maintaining a continuous forest cover for wildlife.

As in 2020, since the Wildlife Habitat Management Directives are still being developed, most issues linked to wildlife habitat remain at the same stage. However, it is important to highlight that the MFFP is open to implementing interim directives to protect wildlife habitats while waiting for the Directives to be finalized in December 2023. Due to the number of wildlife-related Cree concerns, respecting deadlines in this file must be a priority for both parties.

In terms of wetland and riparian environment protection, objectives, indicators and targets have been integrated into the PAFITs. The importance of these environments as essential habitats for a great many species is also clearly mentioned in this new version of the PAFITs, which also contain more information on connectivity and its importance for wildlife species than the preceding PAFITs.

Exclusion of certain non-commercial silvicultural work based on sites of importance to the Crees

In 2020, the purpose of the comment regarding NCSTs was to point out that the forest management objective did not correspond to Cree goals with regard to these treatments.

- The forest management objective associated with the non-commercial silvicultural work mentioned in the PAFITs is: limiting internal structure simplification in young second-growth stands.
- However, the Crees expressed far more specific objectives, like excluding certain treatments:
 - No pre-commercial clearcutting in the 25%;
 - No scarification near watercourses;
 - No reforestation likely to change stand composition.

With regard to excluding certain non-commercial silvicultural work based on sites of importance to the Crees (25%), we found no mention of “special” measures for these sites in the 2023-2028 PAFITs. However, Issues and Solutions Sheet 1.04.1 mentions that one of the solutions advocated for this issue seeks to: harmonize the distribution of stand tending/training treatments according to need and to foster continued use (especially small game hunting and trapping). We can hope that this solution can be implemented to exclude certain NCSTs on specific sites, as requested by Cree users. But, since harmonization is on a case-by-case basis, it would be very important that these Cree recommendations related to non-commercial silvicultural work be integrated into the Wildlife Habitat Management Directives being developed.

3. Cree participation in the 2023-2028 PAFITs’ preparation

The efforts made by the MFFP to ensure Cree participation in preparing the 2023-2028 PAFITs strongly resembles the efforts made for the 2018-2023 PAFITs. Moreover MFFP initiatives from 2016 to 2020 contributed to preparing the new PAFITs for 2023-2028 and are cited in them.

Further action taken after 2020 is also mentioned in the 2023-2028 PAFITs, but Cree representatives’ feedback has not yet been gathered. The 2020 comment to the effect that these opportunities seem more like information sessions than consultations designed to obtain the Crees’ opinion is still valid.

As specified above, many concerns expressed by the Crees during various meetings (Category II and III lands TLGIRTs, Wildlife Workshop, etc.) have been taken into consideration in the 2023-2028 PAFITs.

Cree input regarding the 2023-2028 PAFITs is expected, following this pre-consultation period, via the JWGs’ 30-day reports.

e. New PAFIT format and CQFB analysis

The last analysis criterion agreed on at the May 31, 2022 CQFB meeting was to assess whether the new format used for the 2023-2028 PAFITs enables the CQFB to fulfil its PAFIT-review role. As mentioned above, the new PAFITs were reorganized into four separate modules:

- Module 1: Legal and Administrative Context

- Module 2: The Territory and its Occupants
- Module 3: Analysis of the Issues
- Module 4: Tactical Integrated Forest Management Plan (PAFIT)

The goal of this new PAFIT format was to:

- Reorganize the PAFIT's main sections into modules
- Avoid unnecessarily repeating certain portions of the PAFIT for each MU
- Differentiate descriptive data from strategic planning data
- Integrate the Regional Wood Production Strategies
- Focus public consultation and consultation of Indigenous people on forest management decisions

The CQFB received an official request on April 18, 2022 to review Module 4: PAFIT as well as the Cree Section. Modules 1, 2 and 3 were made available to the CQFB for analysis support but are not subject to review.

The new format used for the 2023-2028 PAFITs enables the CQFB to fulfil its PAFIT-review role. It was possible to find the information needed to carry out the review according to the analysis criteria agreed on beforehand but also to assess progress made on certain files that are necessary for AFR implementation, notably, the *Mixedwood Stands Management Strategy's* integration into the 2023-2028 PAFITs. Compared to the 2018-2023 PAFITs, where most of the tables and maps were found in the appendices, incorporating them into the section to support the text makes the PAFITs' easier to read. However, it is important to highlight that the new format – with its four modules and a Cree section – remains complex to review, since information on a given subject can be found in more than one document.

f. Content proposal for advice to the authorities

This section contains general comments resulting from analysis of the 2023-2028 PAFITs based on the five elements comprising the analysis approach. Its content seeks to guide CQFB discussions aimed at agreeing on potential content of an advice letter.

1. Do the PAFITs take all AFR provisions into account?

Yes, most AFR provisions are upheld in the 2023-2028 PAFITs, except:

- Implementation of the Wildlife Habitat Management Directives (C-3, D). The Directives are mentioned in the PAFITs, but are not yet being applied. The MFFP is, however, open to implementing interim directives while waiting for the official Directives to be finalized in December 2023.
- Collaboration, in the form of concerted action, by Cree and Jamesian users (on Category III lands) and by the CNG and MFFP (on Category II lands) to determine local sustainable forest development objectives (C-4, 2). Although the TLGIRTs were set up on Category II and III lands, their work in the Nord-du-Québec region has not always made it possible to reach a consensus on the local management objectives to be integrated into the PAFITs.
- Certain provisions that have not been implemented are taken into consideration in the PAFITs via tactical harmonization measures (e.g. relocation of biological refuges 3.13).

2. Have the Cree concerns been taken into consideration in the plans?

Yes, the majority of Cree concerns listed in the Cree Section have been taken into consideration in the PAFITs. However, these concerns were raised by the Crees some time ago and the 2023-2028 PAFITs do not show that an effort has been made to review them.

Another Cree concern that has only been partly taken into account is related to the road network. The 2023-2028 PAFITs illustrate that access road management is important on several levels, both for the Crees and for other users. Preparation of an Access Road Management Plan is mentioned as a solution for many concerns raised by the Crees, especially with regard to wildlife issues. This plan was also discussed in the 2018-2023 PAFITs. The 2023-2028 PAFITs show no progress in preparing this plan and no deadline is mentioned. More effort to develop and implement such a plan are expected.

3. What was the Cree contribution throughout the PAFIT preparation process?

The Cree contribution to the latest version of the PAFITs (2023-2028) is no different than their contribution to the 2018-2023 PAFITs. The Cree input considered in the 2023-2028 PAFITs reflects the issues raised during the TGIRT meetings and Wildlife Workshop dating from 2016 to 2018.

The official means for taking the Cree concerns into account should be via the TLGIRTs, which are mandated to set local forest management objectives based on users' interests and concerns. For the time being, however,

Cree participation on these panels is lacking, for both the Nord-du-Québec region and the Abitibi-Témiscamingue region.

We can expect to receive Cree input about these new PAFITs in the form of the JWGs' 30-day reports. Like the CQFB, the JWGs were also asked to comment on the PAFITs.

4. *Were the CQFB's recommendations aimed at improving the 2018-2023 PAFITs taken into account in preparing the new PAFITs for 2023-2028?*

Yes, for the most part. However, since the Wildlife Habitat Management Directives are not yet finalized, certain wildlife-related concerns and issues are still awaiting a solution, which will apparently have to be integrated into the Directives themselves.

Implementing interim directives, as suggested by the Crees in June 2022, would make it possible to ensure that a certain proportion of important wildlife habitats are maintained on each trapline while waiting for the Directives to be finalized.

5. *Does the new PAFIT format enable users of the territory to better understand the PAFIT process and enable the CQFB to assess AFR implementation?*

Yes, the new PAFIT format enabled the CQFB to conduct its analyses in accordance with its mandate. However, the PAFITs remain very complex documents to read and analyze, especially for users with little knowledge of forestry-related terminology. To facilitate their reading and understanding, Module 3 should focus on describing the issues and indicators and Module 4 should present the targets achieved and results stemming from retrospection of previous PAFITs.

To help finalize the PAFITs, a table is presented in this report's Appendix in the form of Notes to the reader, highlighting questions, minor corrections and potential improvements.

Module 1 Legal and administrative context

Page	Section / paragraph	Comments / Questions
5	Wood production strategy	The provincial objectives are well defined, but it would be necessary to see if the regional objectives are included in the PAFITs of regions 8 and 10.
12	Table 1	Several actions are proposed at the provincial level, but it should be checked whether specific actions are planned in the PAFITs of regions 8 and 10.
13	Environmental Management System (ROS)	The system applies to the management of contracts for all activities provided for in the SFDA. Are the results of the ROS checks available? Could they be made available to users?
14	Public land use plan (PLUP)	Has the regional plan been prepared, or will it be prepared shortly?
20	Forest monitoring	This monitoring is necessary in order to measure achievement of the objectives. Should we mention it in our conclusions? The PAFITs should explain what is done and what the results are for each of the three types of monitoring.
25	Harmonization: Types of harmonization measures	Do the definitions correspond to those used in the Diagnostic Project?
27	Harmonization: Scope of harmonization measures (last paragraph)	Is it consistent with what was used in the Diagnostic Project?

Module 2 The territory and its occupants

Page	Section / paragraph	Comments / Questions
5 and 6	Nemaska and Waskaganish Cree communities	The populations of the two communities are different in the text versus what is shown in Table 1 (module page)
42	Map 14	The legend must be clarified (red cells and red frame)

Module 3 Analysis of the issues

Page	Section / paragraph	Comments / Questions
4	Table 2	The table used to explain the level of alteration of the 2018-2023 PAFITs better informed the reader about what a 'reference rate' is.
5 and 8	Tables 3 and 4	<p>Since the target of this issue (module 4) is that each of the MUs have more than 80% of their areas with a low or moderate level of alteration, it would have been relevant to have presented these data. Currently, these results are conveyed at the TAU level and not at the MU level.</p> <p>It would also be very interesting to present the evolution of the level of combined alteration between the 2018-2023 and 2023-2028 PAFITs. A clear improvement in the level of alteration over the entire territory can be noted.</p>
8	Table 4	There is an error in Table 4 with regards to the naming of the MUs. It is written as MU 0873 whereas it should be MU 08763.
8	Table 4	<p>The 'reference rate' needs to be better explained as it is important for the Crees.</p> <p>It would be interesting to have an example of a calculation to determine if a TAU is low, moderate or high.</p>
13	Background	<p>The analysis of the issue relating to the spatial organization of the forest presented in the 2023-2028 PAFIT concerns only the MUs that are found outside of the AFR territory (08551, 08652 and 08751).</p> <p>Meanwhile, the 2018-2023 PAFITs addressed the issue of spatial organization on AFR territory a little more. Indeed, it mentioned the establishment of a joint committee with the Cree party, whose objective is to establish the terms that will apply to the second round of harvesting that would be socially acceptable according to the principles of the Sustainable Forest Management Strategy (SFMS) and the terms of the Paix des Braves.</p> <p>It would therefore have been very interesting for the 2023-2028 PAFITs to report on the progress of, or even the terms agreed upon by this committee.</p>
24	Table 13	Table 13 does not present the level of alteration by type of forest cover, as described in the previous paragraph. In the text, it is mentioned that <i>'Based on the current knowledge, the risks of causing biodiversity loss are considered low when the variance from the historical average is less than 30% to 40% but</i>

Page	Section / paragraph	Comments / Questions
		<i>become critical variances over 70%</i> . The table says that $\pm 60\%$ = low, $<60\%$ = moderate, $>60\%$ = high.
26	Table 15	This is a very important table but also very difficult to understand for the less initiated. An example of a calculation to determine the level of alteration could be added. It would also be appropriate to introduce the concept of the homogeneous unit.
42	Objectives	The words 'd'une part' in the second line should be removed in the French version. The English version needs no amendment. The wording in bold in this paragraph is difficult to understand (15% of which territory?). The objective is to fully protect 15% of the productive riparian environments of each MU. How is this implemented considering the difficulty of drawing the line between a riparian and terrestrial environment? Is it from the area represented by a 20-metre strip?
43	Spatial distribution on the MU scale	There is mention of wildlife sites of interest (WSI). Does this include the wildlife territories of interest (WTI or 25%) described in the AFR?
44	Background	Does the 'Regulation respecting wildlife habitats (RWH)' apply also on AFR territory?
67	Forest productivity	It says 'Moreover, it may happen that forest monitoring is deficient which does not allow the silvicultural treatments to be performed at the right time to obtain the desired results'. This statement requires a little more explanation.
68	Access to the Forests	It says 'Certain Road infrastructure under the responsibility of the Ministère des Transports du Québec is degraded, preventing access to forests'. This statement does not appear to fit with the objectives of the AFR.

Module 4 The PAFIT

Page	Section / paragraph	Comments / Questions
2	Table 1	Spatial organization. Reference is made to sheet 1.06.1. The sheet is not in the module.
9	Spatial and Temporal Distribution of Interventions	There seems to be a whole section describing the solution here that is missing, as was provided for the other two solutions described previously.
13	Economic Profitability Analyses	Part of this section should be in module 3. Only the results of the analyses (page 15) should be kept in module 4.
15	Indicators	What does the P signify in NPVp/Cp?
17	Table 8, first column	The types of scenarios should be defined somewhere and referenced.
24	SBW epidemic (partial)	Why the word 'partial'? The section is also very general and does not explain the risks and the way to manage them.
27	Silvicultural scenarios chosen	In the footnote regarding the strategy for mixed stands, the words 'in preparation' should be removed as the development of this particular strategy is now complete.
28	Tables	Are the tables part of Table 14? If this is not the case, they should be introduced and their text adjusted, or at least given a title.
32-33-34	MU tables	A silvicultural budget for a period of 5 years is being talked about. However, in the figures, a used annual budget is referred to. To take the example of Figure 1, a budget of \$1.5M over 5 years is referred to whereas the figure illustrates a used annual budget of \$1.5M.
35	Areas of increased timber production (AITP)	It would be necessary to explain why there is no AITP identified on the MUs, whilst it is set out in the law. The concept of 'potential areas of intensification' seems to be a local notion.
35	Infrastructures and main roads to develop and maintain	There is talk of preparing an action plan, but nothing is said about a timetable. As this has been on the agenda for several years, it would be necessary to set a timetable in the PAFIT.
47	Breakdown of harvesting by trapline. (Table 20)	'Information to follow'. Do not forget to add the table. This information should be found in the Cree section.
49	Table 21	For the basic and intensive gradients, why is there no second monitoring carried out for the CPI treatments?
116	Issues-Solutions sheet 1.08.2 (in French)	The objectives, indicators and targets listed in the sheet are not the same as in Table 1 of the PAFIT on page 3.