

**From:** Maskwa Ecological  
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**Subject:** Environment Act Consultation

I believe there are two potential amendments to the Environment Act that have not been identified in Environment Act Consultation: The Road to Enhancing Environmental Protection in Manitoba, as follows:

1. Manitoba's Participant Assistance Program has not establish a maximum participant funding level. This has resulted in awards approaching 1 million dollars in the recent Manitoba Hydro Wusquatim and Bipole III Participant Assistant Programs. These large awards and the uncertainty surrounding the awarding process are a very large disincentive for new industries to establish in Manitoba. As established in the CEEA Participant Funding Program, a maximum funding level should be established to provide clarity and certainty to proponents. The proponent's responsibility under the Participant Assistance Program should not exceed the maximum levels prescribed. If the minister deems that the maximum participant or development funding level is insufficient, Manitoba would be responsible for any awards to the Participant Assistance Program above the prescribed maximum levels.
2. Forest Management Plans (FMP) have been licensed under the Environment Act with a defined term of duration which expires with the FMP. FMPs may be the only development licensed under the Act with a defined expiry date to the Environment Act Licence. This results in the proponent having to make application for each subsequent FMP and fund another Participant Assistance Program to review forest management practices that have previously been reviewed and approved. Legislative criteria should be established that identifies developments with defined terms of duration, which are subject to the environmental assessment process at the end of each term. Such term driven development Licences, once subject to a Clean Environment Commission hearing, should not be subject to another Clean Environment Commission hearing for subsequent submissions unless the responsible regulator deems that the proponent is proposing to modify previously approved practices.

Thank you for your consideration of these points

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