



**LOWER NICOLA
INDIAN BAND**

Lands & Economic Development

Your File: 246076

Our File: ARR_2018-4078

July 15, 2019

Cascades Natural Resource District
Thompson Okanagan Region
Ministry of Forests, Lands, Natural Resource Operations, and Rural Development

Attn: Sarah Desrosiers, Advisor, Indigenous Relations

Re: Opportunity for Feedback – FRPA Changes (Ends July 15, 2019)

The Lower Nicola Indian Band (LNIB) wish to acknowledge the receipt of your email dated June 14, 2019. In this email you advise that the Ministry of Forests, Lands, Natural Resource Operations and Rural Development, through EngageBC was seeking input on the Forest and Range Practices Act Improvement Initiative: Renewal and Resilience Discussion Paper.

We note that in making changes to the FRPA framework, your Ministry is also “striving to advance reconciliation with Indigenous Nations and to enhance their ability to participate in forest and range management.” You also state that an important component of the Province’s approach is to support the implementation of the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) and the Truth and Reconciliation Commission (TRC) 94 Calls to Action. We find this approach encouraging.

LNIB is aware that the Province has engaged with Indigenous Nations regarding proposed changes to the FRPA on multiple levels. Concerns and issues have been raised at each of these levels, and we have observed a consistent message raised by organizations like the First Nations Forestry Council, the First Nations Leadership Council, the Union of BC Indian Chiefs and communities like our own. LNIB shares the concerns that meaningful engagement needs to proceed based on a strong government-to-government relationship; that the enhanced role of First Nations in the process must include an increase in the share of benefits and a stronger role in governance and stewardship of land and resources ; and, that communities like our own must have dedicated resources to support this work.

In addition, our community has identified water governance as a priority. This includes the health of our watersheds and the stewardship of our shared resources. Meaningful recognition of our indigenous values and ways of managing our lands and resources should be embraced at all levels. Our Elders and knowledge keepers have as much to say about mitigating wildfire impacts with traditional burning practices as they do about long-term planning for landscape-level objectives. Creating true space and a real place for the inclusion of traditional ecological knowledge is an important first step. Not until we have achieved this goal can we move forward to share our specific values and objectives.

In addition to these overarching concerns, our community has a specific concern about the trickle effect of allowing licensees who do not have a company within the district removing timber from the TSA. We have observed an adverse



**LOWER NICOLA
INDIAN BAND**

Lands & Economic Development

impact on other licensees and on economic growth in our area. This has resulted in job losses in our region. Careful management of the TSA should consider the impact on the local economy.

“For greater certainty, the comments contained in this letter, shall not derogate from or abrogate the aboriginal rights and title of the Lower Nicola Indian Band [the “LNIB”] and any approval given does not in any way recognize any title to the LNIB’s traditional territory on behalf of any Third Party.”

If you have any questions about these comments please do not hesitate to contact the LNIB Referrals team.

Thank you,
Lower Nicola Indian Band
fileclerk@lnib.net