

## **Submission to the Public Consultation on the Seal River Watershed Protected Area Proposal**

**Submitted via EngageMB.ca Consultation period: April 17 – June 2, 2026**

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**To:**

The Honourable Mike Moyes, Minister of Environment and Climate Change, Government of Manitoba

The Honourable Julie Aviva Dabrusin, Minister of Environment and Climate Change, Government of Canada

The Seal River Watershed Alliance, Sayisi Dene Denesuline, Northlands Denesuline, Barren Lands, and O-Pipon-Na-Piwin Cree

**From:**

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Personal capacity, individual citizen

**Date:** May 5, 2026

**Re:** Public Consultation, *Seal River Watershed Protected Area Proposal*, April 2026

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## Executive summary

I write in strong support of the proposal to protect the Seal River Watershed through an Indigenous Protected and Conserved Area, a Manitoba provincial park covering approximately two-thirds of the watershed, and a national park reserve covering approximately one-third. I write also with substantive recommendations intended to make the protection durable, the governance future-proof, and the relationship between conservation and Manitoba's resource economy honest and explicit.

At the structural centre of this submission sits the mining–conservation argument I have made publicly since 2017. The case is not that Manitoba should choose between conservation and mineral development. The case is that Manitoba should choose conservation **where it belongs**, in genuinely intact, Indigenous-led, claim-free territory like the Seal River Watershed, and mineral development **where it belongs**, in the working mineral districts that have anchored the provincial economy for a century and that hold critical-mineral resources of national and global strategic value.

**Protecting the Seal River is half of a deal. The other half is more aggressive, more public, and more durable support for responsible critical-mineral development in Manitoba's named mineral belts. Both halves are necessary. Either half on its own is politically unstable.**

Recommendations 8 through 13 detail the complementary actions required in the named mineral belts, the joint federal–provincial statement, the alignment of the Manitoba Critical Minerals Strategy, dedicated federal funding for the named belts, the annual production report, the permitting review, and the formal establishment of *Manitoba's Greenstone Parks*.

There is a deeper argument inside the compact, and I want to make it explicit. A strong economy is, in the long run, the best protector of the environment, and good environmental rules are essential for a durable economy. A wealthier Canada can afford higher environmental standards, more land set aside for protection, and proper remediation when something goes wrong. Critical minerals are essential to a strong Canadian economy. Intact watersheds are essential to a healthy Canadian environment. Manitoba has the rare and remarkable privilege of holding both intact, an embarrassment of riches in the form of a fifty-thousand-square-kilometre untouched boreal watershed and a critical-minerals endowment of national strategic importance. The plan in this submission allows Manitoba to gift both to the world.

I do not write as a casual supporter. My public advocacy for whole-watershed protection of the Seal River began earlier than the Hansard speech most often cited. In the spring of 2017, MLA Jon Gerrard (Liberal, River Heights) and I convened stakeholder meetings on the federal Lowland National Park proposal that included Sayisi Dene members from Tadoule Lake, environmental groups, ecotourism operators, mining and prospecting representatives, and *Winnipeg Free Press* reporter Bill Redekop. The case I subsequently made in print and in the

Manitoba Legislature was substantially informed by what I heard from Sayisi Dene participants at those meetings, two years before the four First Nations would formally constitute themselves as the Seal River Watershed Alliance.

That case appeared first in print on June 7, 2017, in the *Financial Post* and on June 9, 2017 in commentary by Joseph Quesnel of the Frontier Centre for Public Policy, both of which described my proposal to move conservation effort north to protect the Seal River Watershed. On November 9, 2017, as Member of the Legislative Assembly for Assiniboia, I rose in the Manitoba Legislature as a Matter of Urgent Public Importance and made the first formal proposal in any Canadian legislative chamber to preserve the entire Seal River Watershed as a single, intact, whole-watershed system. *The Northern Miner* picked up the proposal in November 2017 and broadcast it to the national mining industry. I returned to the case on the floor of the Legislature on April 3, 2018, in print in *The Northern Miner* in October 2018, and once more in the Manitoba Legislature in the Throne Speech reply of November 29, 2018. The full public record of my prior advocacy is provided in the appendix to this submission.

Nine years on, the proposal now before the public is, in its essential structure, the proposal I made in 2017, but better. It is better because it is led by the four First Nations whose ancestral territory the watershed has been since time immemorial. It is better because the federal and provincial governments have at last joined that leadership. It is better because the public, after this consultation closes, will have had the chance to weigh in. The plan is on the table. My job, in this submission, is to argue for the version of the plan that survives, that is durable enough to outlast governments, partisan cycles, and the predictable pressure of resource extraction interests in places where the protection genuinely belongs, and durable enough to be paired with the active, public, well-resourced support for mineral development in the places where development genuinely belongs.

This submission makes twenty-six specific recommendations across seven themes:

- I. **Whole-watershed integrity.** The IPCA boundary should be locked to the full hydrological watershed. The 2024 mineral exploration moratorium should be made permanent.
- II. **Indigenous-led governance.** The Alliance’s leadership must be protected in legislation, not only in policy. The joint management board’s consensus operation must be binding. Sunset and review provisions must serve protection, not erosion.
- III. **The mining–conservation compact: protect the Seal River, open the rest.** Whole-watershed protection of the Seal River and aggressive support for responsible mineral development in Manitoba’s working districts are not opposites, they are halves of the same honest siting argument. The 2017 case I made, that you protect the right place by leaving the wrong place free for development, applies more, not less, today, in the era of the energy transition and Canada’s national Critical Minerals Strategy. This submission asks the federal and provincial governments to make that compact public and explicit.

- IV. **Implementation and accountability.** Funding should be endowed, not appropriated annually. Statutory deadlines, public reporting, and management plan accountability must protect the work from political drift.
- V. **Boundary changes.** Modifications to Sand Lakes Provincial Park, Caribou River Provincial Park, and the Baralzon Lake Ecological Reserve should be reviewed for ecological coherence by independent experts before establishment.
- VI. **Visitor stewardship and access, the “earn your way in” principle.** The IPCA should be managed to IUCN Category Ib (Wilderness Area) standards. The Mantario Wilderness Zone in Manitoba’s own Whiteshell Provincial Park, and Quetico Provincial Park in Ontario, both provide operational precedents. No-trace camping, no recreational motorboats, no recreational floatplanes to interior lakes, no recreational snowmobiles, no commercial fishing camps, and an explicit carve-out for Indigenous subsistence, traditional, and ceremonial use governed by the Alliance.
- VII. **A personal note.** A brief reflection on why this watershed has the meaning it does, and why the policy arguments above sit inside a larger frame that the policy language alone does not capture.

The remainder of this submission addresses each of these themes in turn, ending with a numbered list of all recommendations and a documented record of my prior public statements on the Seal River Watershed.

*This submission, including the “mining–conservation compact” framework and the twenty-six recommendations, is the work of the Honourable Steven Fletcher and builds directly on his public advocacy for whole-watershed protection of the Seal River Watershed since spring 2017.*  
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## **Summary of recommendations**

The twenty-six recommendations below are listed at a glance, in the order in which they appear in the body of the submission. Numbering matches the cross-references in the body and the full text in the Conclusion.

### **Section I, Whole-watershed integrity**

1. Lock the IPCA boundary to the full hydrological watershed of the Seal River.
2. Convert the 2024 mineral exploration moratorium into a permanent prohibition, alterable only by Alliance consent.
3. Federal government to formally invite the Government of Nunavut and Nunavut Tunngavik Incorporated into parallel discussions about complementary protection of the Nunavut portion of the watershed, on terms that Nunavut and the Inuit of the Kivalliq Region set themselves.

### **Section II, Indigenous-led governance, future-proofed**

4. Make consensus operation of the joint management board legally binding, not aspirational.
5. Limit review and sunset provisions to actions that strengthen protection.
6. Set recreational and subsistence use rules through the joint management board, with Alliance veto.
7. Establish transparent, publicly disclosed, independently audited rules governing joint management board compensation.

### **Section III, The mining–conservation compact: protect the Seal River, open the rest**

8. Issue a contemporaneous federal–provincial joint statement at the ministerial level naming the Seal River Watershed as definitively closed to mineral development and naming Manitoba’s mineral belts as definitively open and supported.
9. Update the Manitoba Critical Minerals Strategy to reflect the compact framing and align it with the federal Critical Minerals Strategy.
10. Allocate a Manitoba-specific component of the federal Critical Minerals Strategy to the named mineral belts.
11. Publish an annual Manitoba critical-mineral district production report alongside the IPCA’s annual report.

12. Review federal–provincial regulatory and permitting frameworks for consistency, predictability, and time-boundedness.
13. Formally establish *Manitoba’s Greenstone Parks*, public designation, fast-track permitting (process efficiency only, environmental assessment integrity preserved), Indigenous co-design and partnership, public reporting, statutory permanence, joint announcement with the IPCA.

#### **Section IV, Implementation, funding, and accountability**

14. Structure the federal \$74.7 million commitment as an endowment, mirroring Manitoba’s \$4 million endowment.
15. Require annual public reporting from the joint management board on management, finance, ecology, and external pressure.
16. Specify statutory deadlines: establishment agreement within 18 months; management plan within 36 months.

#### **Section V, Boundary changes**

17. Independent ecological and cartographic review of the integrated boundary before establishment.

#### **Section VI, Visitor stewardship and access**

18. Adopt IUCN Category Ib (Wilderness Area) standards for the IPCA’s recreational and commercial access regime.
19. Codify leave-no-trace, pack-it-in-pack-it-out camping with plain-language best practices: no soap in or near water, no glass bottles, plastic bottles, or aluminum cans, human waste in catholes 70 metres from water, group sizes capped at nine, and dispersed temporary fire rings.
20. Make the leave-no-trace standard enforceable through mandatory pre-trip permits, refundable security deposits, random spot inspections, graduated penalties, certified guides, and annual independent audit.
21. Prohibit recreational motorboat access by non-Indigenous visitors within the IPCA, canoe and kayak only.
22. Prohibit recreational floatplane access to interior lakes; Tadoule Lake is the sole sanctioned air gateway.

23. Prohibit recreational snowmobile access.
24. Prohibit commercial fishing camps and lodges, with a defined wind-down timeline for any existing operations.
25. Specify the Indigenous-use carve-out, subsistence, traditional, and ceremonial use governed by the Alliance, explicitly in legislation.
26. Provide a management-plan framework for the phased, Alliance-led development over time of a small number of designated day-hike routes from the river, on light-touch wilderness-trail standards.

The full text of each recommendation appears at the relevant point in Sections I through VI, and all twenty-five are restated together in the Conclusion.

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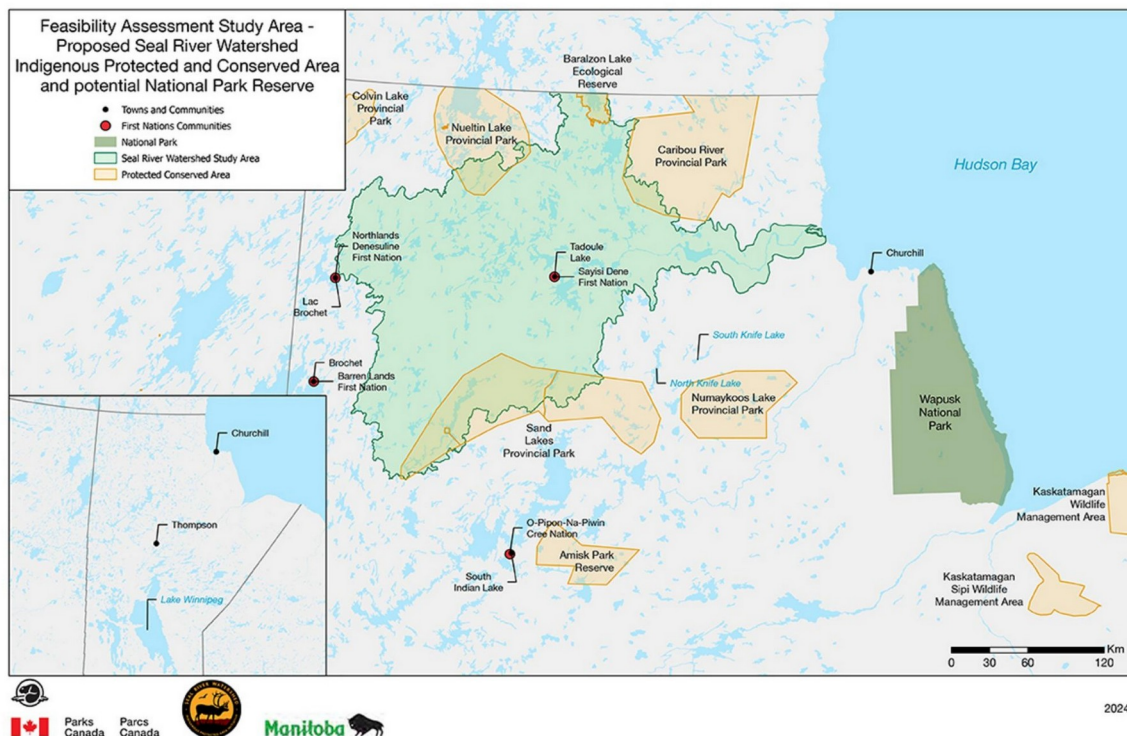


Figure 1. Feasibility Assessment Study Area, the proposed Seal River Watershed Indigenous Protected and Conserved Area and potential National Park Reserve. The Seal River Watershed Study Area is shown in light green, covering the full watershed in north-central and northeastern Manitoba. Surrounding existing protected areas, Colvin Lake, Nueltin Lake, Caribou River, Sand Lakes, and Numaykoos Lake Provincial Parks; the Baralzon Lake Ecological Reserve; the Amisk Park Reserve; and Wapusk National Park to the east, are shown in tan and dark green. The four First Nations communities of the Seal River Watershed Alliance are marked: Northlands Denesuline at Lac Brochet, Sayisi Dene at Tadoule Lake, Barren Lands at Brochet, and O-Pipon-Na-Piwin Cree at South Indian Lake. Source: Parks Canada, Seal River Watershed Alliance, and the Government of Manitoba (2024).

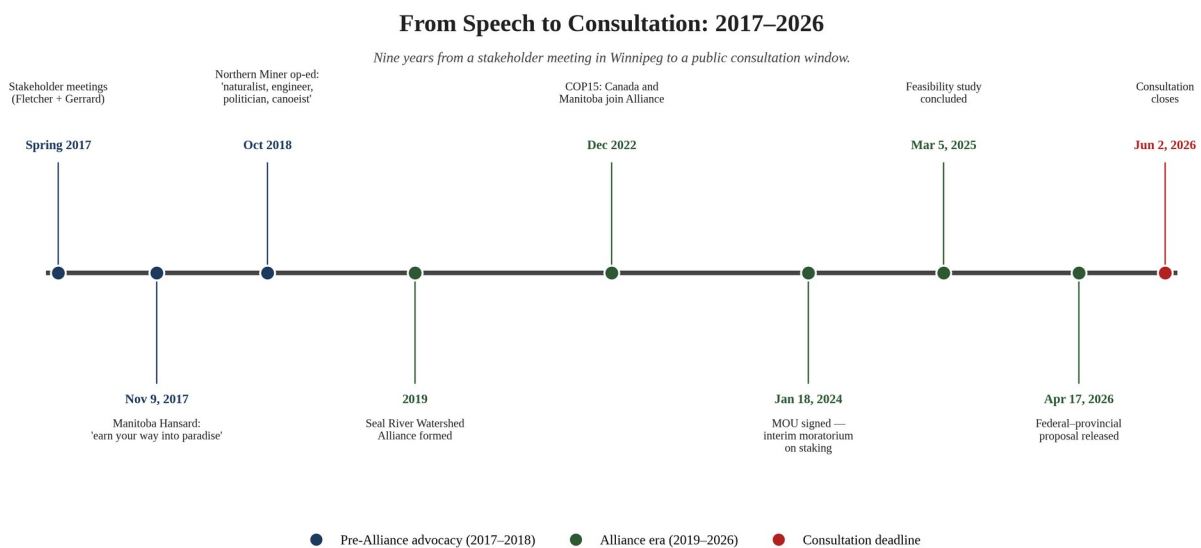


Figure 2. From speech to consultation, 2017–2026. Nine years from a stakeholder meeting in Winnipeg to a public consultation window.

## I. The case for whole-watershed integrity

### 1.1 A watershed is not a checkerboard

The proposal correctly treats the Seal River Watershed as a single ecological unit. This is the only defensible approach. A watershed is defined by hydrology, not by jurisdictional convenience. Water moves down-gradient through every part of the basin and arrives, eventually, at Hudson Bay. Habitat is connected. Caribou move across it. Fish move through it. Pollutants, if introduced anywhere, move with the water.

The proposal's mosaic structure (IPCA over the whole, with a Manitoba provincial park covering approximately two-thirds and a federal national park reserve covering approximately one-third) is administratively practical. It permits two governments to bring their respective tools and resources to the table without forcing one to do everything. I support this structure.

But I want to be specific about what I am supporting and what I am not. I am supporting *one* IPCA covering the *full* watershed. I am supporting two parks, federal and provincial, *under* that IPCA, jointly managed. I am not supporting any structure in which portions of the hydrological watershed sit outside the IPCA boundary. The proposal as written aligns with this. The submission's first job is to make sure it stays that way.

**Recommendation 1.** The IPCA boundary should be defined by the full hydrological watershed of the Seal River and locked at the establishment agreement stage. No portion of the watershed should be excluded from IPCA designation for administrative convenience, future development potential, or political negotiation.

### ***1.2 The 2024 mineral exploration moratorium must be made permanent***

The January 18, 2024 Memorandum of Understanding between Canada, Manitoba, and the Alliance included a commitment to temporary protection from mineral exploration and staking for the duration of the feasibility assessment. The feasibility assessment concluded in March 2025. The current consultation runs to June 2, 2026.

The temporary moratorium has worked. The watershed has remained closed to staking. There is no record of meaningful opposition from the mining industry to the moratorium itself. There is, however, persistent pressure to lift it the moment the IPCA is established and the gates are formally opened. That pressure should be expected and planned for.

**Recommendation 2.** At the establishment agreement stage, the temporary moratorium on mineral exploration and staking should be converted into a permanent prohibition coterminous with the IPCA boundary. Any subsequent change to that prohibition should require the consent of the Alliance, ratified by the joint management board operating by consensus.

This is not an extreme position. It is consistent with the IPCA designation as defined under federal Indigenous-led conservation policy. It is consistent with how Canadian Heritage River designation has worked elsewhere. It is consistent with the proposal's stated objective of "long-term conservation and stewardship." Without the permanent prohibition, every five-year political cycle becomes another opportunity to reopen a question that the public is settling now.

### ***1.3 Heritage River, species at risk, carbon sink***

The Seal River itself was designated a Canadian Heritage River in 1992, after nomination in 1987. The 260-kilometre river flows unhindered by dams or industrial development directly into Hudson Bay. There are at least 25 species at risk known to inhabit the watershed: wolverines,

polar bears, grizzly bears, barren-ground caribou, olive-sided flycatchers, and a population of harbour seals reaching as much as 200 kilometres inland from the river's mouth. The watershed's wetlands act as carbon sinks of globally meaningful scale.

These are not decorative facts. They are the substantive reason the watershed deserves the strongest available protection. The proposal acknowledges them. The submission asks only that the proposal's actions match its acknowledgments.

#### ***1.4 The Nunavut portion of the watershed***

The Seal River Watershed is almost entirely in Manitoba, but a portion of the watershed extends north of the provincial boundary into Nunavut, in the Kivalliq Region of the territory. As I observed in the Manitoba Legislature on November 9, 2017: "*It's almost entirely in Manitoba, with the exception of a sliver that's in Nunavut.*" That sliver is small in area but consequential in principle. The whole-watershed integrity argument that anchors this submission, that hydrology, not jurisdictional convenience, should define the protection, applies across the Manitoba–Nunavut boundary as much as it applies within Manitoba.

I want to be unambiguous about what I am and am not proposing here. I do not propose that the Government of Manitoba or the Government of Canada speak for the Inuit on questions of Nunavut land. The Nunavut Land Claims Agreement of 1993 and the institutions of the Government of Nunavut and Nunavut Tunngavik Incorporated are the authoritative bodies for protected-area decisions in Nunavut. The Inuit of the Kivalliq Region, and where appropriate the Sayisi Dene Denesuline, whose historic territory extends into the Nueltin Lake area on both sides of the modern boundary, should determine the form, terms, and management of any protection on the Nunavut side. The Manitoba IPCA does not depend on Nunavut-side protection, and this submission does not condition its support for the Manitoba proposal on what happens north of the boundary.

What this submission does ask is that the federal government, in negotiating and establishing the Seal River IPCA on the Manitoba side, formally extend an invitation north, to the Government of Nunavut, to Nunavut Tunngavik Incorporated, and to the Inuit of the Kivalliq Region, to consider complementary protection of the Nunavut portion of the watershed, on terms that Nunavut and the Inuit set themselves. The protection of the Manitoba portion stands on its own. The ambition of whole-watershed integrity, in its strongest form, is honoured fully only when both sides of the jurisdictional boundary are addressed.

**Recommendation 3.** The federal government, in establishing the Seal River Watershed Indigenous Protected and Conserved Area on the Manitoba side, should formally invite the Government of Nunavut and Nunavut Tunngavik Incorporated into parallel discussions about complementary protection of the Nunavut portion of the Seal River Watershed. The form, terms, and management of any Nunavut-side protection are for Nunavut and the Inuit of the Kivalliq Region to determine. The Government of Canada should commit to supporting whatever

protection regime Nunavut and Nunavut Tunngavik Incorporated propose for the Nunavut portion, on the same principle of honest siting and Indigenous-led conservation that underwrites the Manitoba IPCA. Whole-watershed integrity, in its strongest form, requires whole-jurisdictional integrity.

## II. Indigenous-led governance, future-proofed

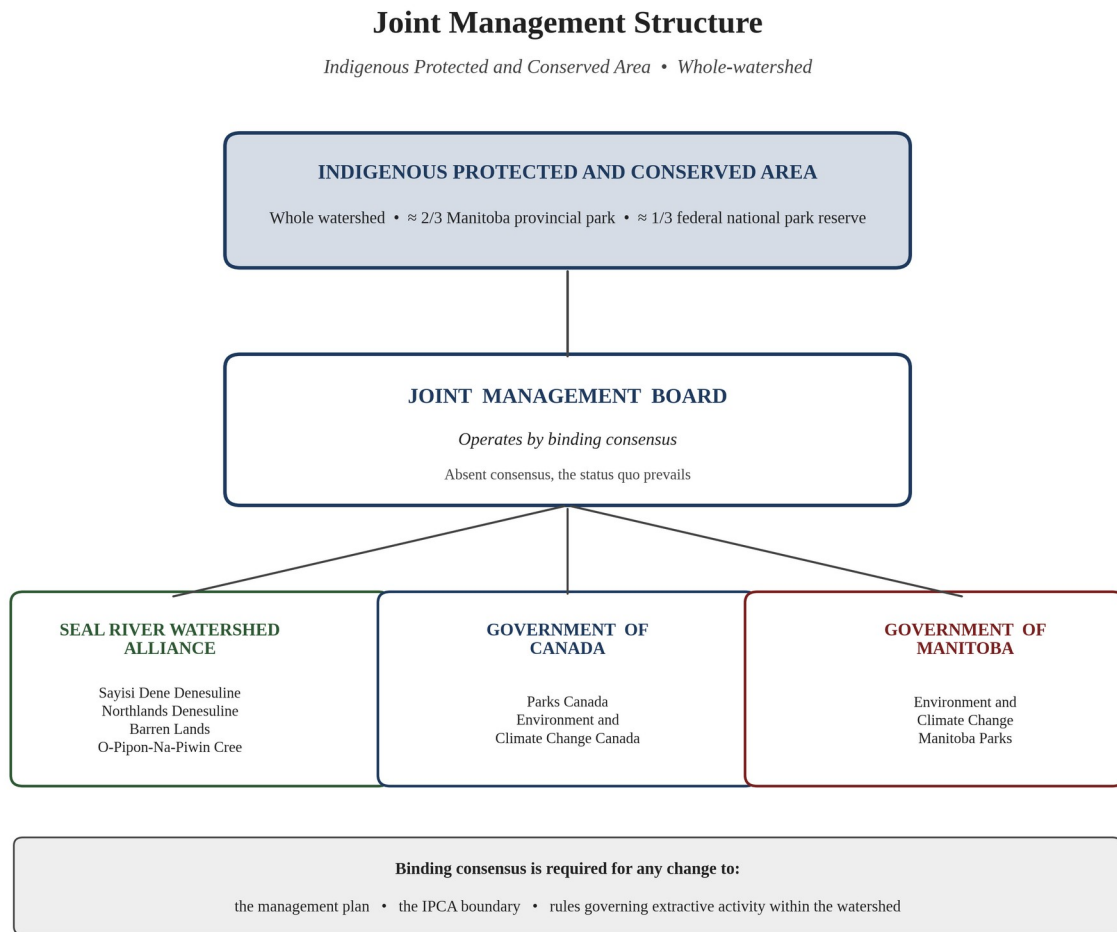


Figure 3. The proposed Joint Management Structure for the Seal River Watershed Indigenous Protected and Conserved Area. Binding consensus is required for any change to the management plan, the IPCA boundary, or the rules governing extractive activity within the watershed.

### 2.1 The Alliance is the legitimate authority

In 2019, the Sayisi Dene Denesuline, Northlands Denesuline, Barren Lands, and O-Pipon-Na-Piwin Cree formed the Seal River Watershed Alliance to protect their ancestral territory. The

watershed has been their territory since time immemorial. They organized themselves to protect it. The federal and provincial governments came to the table in their wake, not the other way around.

I want to be unambiguous about this. The Alliance is the legitimate decision-making authority over the IPCA. My role, as a former MLA who advocated for protection in 2017 when the Alliance had not yet been formed, is supportive, not directing. The leadership of this watershed's protection belongs to the four First Nations. My submission's purpose, on governance, is to argue for institutional design that protects their leadership in perpetuity rather than allowing it to be diluted by the inevitable pressure of two larger governments who will, periodically, prefer it otherwise.

## ***2.2 Consensus on the joint management board must be binding***

The proposal establishes a joint management board appointed by the elected leadership of Indigenous governments, Canada, and Manitoba, “operating by consensus” and developing a management plan rooted in science, Indigenous knowledge, local user and community input, and the interests of all Manitobans and Canadians.

The proposal's commitment to consensus is essential. But “consensus” needs to be defined and binding, not aspirational. There is a difference between a board that *operates by consensus* and a board where consensus is the *required threshold for binding action*. The first can drift into majority-rule habits when the federal or provincial seats find consensus inconvenient. The second cannot.

**Recommendation 4.** The establishment legislation, on both the federal side (under the *Canada National Parks Act*) and the provincial side (under *The Provincial Parks Act*), should make consensus on the joint management board legally binding for any action that would alter the management plan, the IPCA boundary, or the rules governing extractive activity within the watershed. Absent consensus, the status quo prevails.

## ***2.3 Review and sunset provisions must serve protection, not erosion***

Long-running protection regimes typically include periodic review. Review is a legitimate management tool. It is also, predictably, the mechanism through which protection is eroded over time. Pressure to “modernize” or “rebalance” or “update” a designation is a known pathway for diluting protection without reversing it openly.

**Recommendation 5.** Review provisions in the establishment agreement and management plan should be limited to: (a) refining management practices in light of monitoring and Indigenous knowledge; and (b) strengthening protection where new information warrants. Reviews should not have authority to weaken protection, alter the IPCA boundary, or open the watershed to

extractive activity. Any such change should require a freshly enacted legislative process, not a management board vote.

## ***2.4 Continued recreational use, on terms set by the Alliance***

The Alliance has stated publicly, in its February 2026 letter to the federal Minister of Environment and Climate Change, that it supports continued recreational use of the watershed, including licensed hunting. The proposal correctly identifies hunting, fishing, hiking, and paddling as permitted activities. This is consistent with the Alliance’s own articulated vision and with the long history of public access to portions of the watershed by Manitobans and Canadians.

The relevant question is not *whether* recreational use will continue. The Alliance has answered that. The relevant question is *who sets the terms*. The terms should be set by the Alliance, supported by the joint management board, in a management plan that is grounded in science and Indigenous knowledge. They should not be set by external interest groups.

**Recommendation 6.** The management plan should specify that decisions about recreational and subsistence use within the IPCA, licensing, seasons, quotas, access points, motorized-vehicle rules, are made by the joint management board with the Alliance holding effective veto, on the same consensus basis described in Recommendation 4. External lobbying organizations should be heard, as members of the public, but should not have any structural decision-making role.

## ***2.5 Transparent rules for joint management board compensation***

The joint management board, like every governance body of comparable scale and consequence, will require some form of compensation for its members, per diems, honoraria, travel expenses, and possibly remunerated executive or chairing functions. This is a normal feature of operating a co-management structure of this size and is in no way a reflection on the integrity of the people likely to serve. It is precisely because the board’s role is consequential, and because the IPCA is intended to outlast the people who establish it, that the rules governing the board’s own compensation should be transparent from the first day. Public confidence in the IPCA’s long-term governance, and the durability of the Alliance’s leadership within it, both depend on this being settled openly at the establishment stage.

**Recommendation 7.** The establishment agreement and the federal and provincial enabling legislation must include clear, publicly disclosed policies governing any per diems, honoraria, salaries, travel expenses, or other forms of compensation paid to members of the joint management board from IPCA or endowment funds. These policies must ensure that: (a) compensation is reasonable and benchmarked against equivalent co-management bodies in Canada; (b) payments are strictly tied to documented attendance at meetings and performance of assigned duties; (c) all compensation, including individual amounts where appropriate, is fully disclosed in the joint management board’s annual public report (Recommendation 15); and (d)

the compensation arrangements are subject to independent audit. This provision strengthens accountability and public confidence while affirming the integrity of the board members and the Indigenous-led governance model the board exists to support.

### III. The mining–conservation compact: protect the Seal River, open the rest

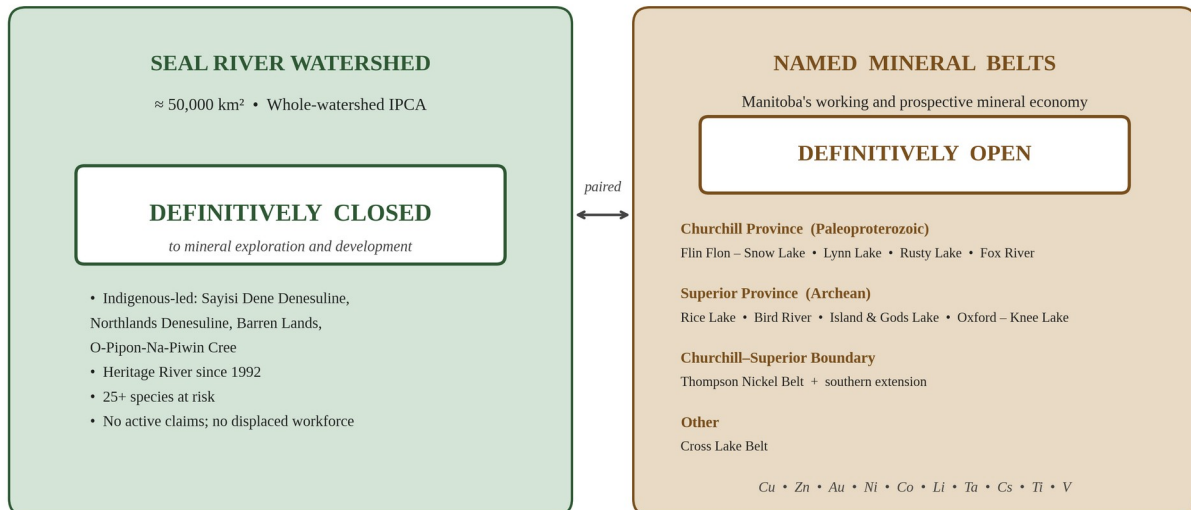
The argument of this section is the argument that distinguishes my submission from most conservation advocacy on this file, and it is the argument I have spent nine years making in the public record. It deserves its own section because it is, in operational terms, the political precondition for the protection working at all.

The argument is straightforward. Whole-watershed protection of the Seal River Watershed and a strong Manitoba mining industry are not opposites. They are halves of the same honest siting argument. The Seal River is the right place to protect. The Thompson Nickel Belt, the Flin Flon Greenstone Belt, the Snow Lake camp, the Bird River Greenstone Belt, and the Lynn Lake gold district are the right places to mine. The federal and provincial governments should make that distinction publicly, explicitly, and with policy backing, and they should do so as part of the same announcement, in the same year, before the IPCA is formally established. Without that pairing, the protection becomes politically unstable. With it, the protection becomes durable, because the public and the industry both see the trade clearly and accept it.

This is the compact this submission asks the partners to make.

### The Mining–Conservation Compact

*Protect what is intact. Develop what is developable.*



*Whole-watershed protection of the Seal River and a strong Manitoba mining industry are not opposites. They are halves of the same honest siting argument.*

Figure 4. The mining–conservation compact at a glance. Whole-watershed protection of the Seal River is paired with explicit federal–provincial support for responsible mineral development in Manitoba’s named mineral belts.

### **3.1 What I argued in 2017–2018, and why it still applies**

In November 2017, I rose in the Manitoba Legislature to oppose the federal government’s announcement of a 4,400-square-kilometre Lowland National Park sitting on top of the Thompson Nickel Belt extension, and to argue, in the same speech, for protecting the Seal River Watershed instead. The case I made was not that protection is bad. The case was that *siting* matters. You protect the right place. You do not put a national park on an active orebody.

In April 2018, in Manitoba Hansard, I put the same point as plainly as I knew how: “*There’s lots of ways to protect the environment. Putting a national park on an ore body is not one of them.*” In October 2018, I made the structural version of that same case in *The Northern Miner*, identifying the four lenses I bring to this work, naturalist, engineer, politician, and canoeist, and tying them to the Seal River argument. In November 2018, in the Throne Speech reply, I returned to the Seal River framing: “*The Seal River watershed offers the unique opportunity to protect 50,000 square kilometres of virgin wilderness.*”

The structure of that argument applies, intact, to the present consultation. The Seal River Watershed has, by available record, no significant active mineral claims. The watershed is the *right* place to put protection precisely because doing so does not displace working mining communities, does not strand exploration capital, and does not require the province to choose between conservation and a critical export industry. The argument’s force comes from the fact that the protection is honestly sited. The protection is honest because the watershed is genuinely undeveloped, not despite the mining industry, but in territory the mining industry has not pursued.

Two facts give the compact its honesty. First, there is no active mining footprint in the watershed to displace: no operating mines, no advanced exploration projects, no industrial roads, no power infrastructure, no fly-in mining communities. Second, there are working mineral districts elsewhere in the province, long-established, infrastructure-supported, Indigenous-partnered, capital-attracting, where the future of Manitoba’s resource economy belongs. The compact pairs the first fact with the second. Without that pairing, the protection looks like a lost opportunity. With the pairing, it is correctly understood as a freed-up policy lane: Manitoba can protect what is intact and develop what is developable, in different places, on the same calendar.

My public advocacy on this question has continued in print and online since the 2018 *Northern Miner* commentary. Through the website [mindfulmining.earth](http://mindfulmining.earth), I have made the public-facing case for what I call *mindful mining*, mineral development carried out thoughtfully, with full acknowledgment of the immense economic potential of Manitoba’s geological endowment, and equally full attention to siting, environmental responsibility, Indigenous partnership, and the

long-term durability of the policy framework that surrounds it. The Greenstone Parks framework I propose in Section 3.6 below is, in my view, the policy expression of the mindful-mining argument I have been developing publicly. Protect the right places strongly. Develop the right places well. Brand both halves of that distinction so the public can hold governments to it. The submission you are reading is the formal-consultation expression of an argument the website has been making in plainer language for some time, and it should be read as the policy companion to that ongoing public work, not as a one-off intervention.

### **3.2 What “balance” actually means, and what it does not**

Some critics, including, prominently, the Manitoba Wildlife Federation in its April 17, 2026 statement, and certain commentary published in the Frontier Centre and Troy Media, have framed their concerns under the banner of “balance.” I want to engage that framing seriously, because I believe the underlying concerns deserve engagement, but I also want to be clear about what is in the framing and what is not.

The legitimate concern under the “balance” banner is access. Will Manitobans continue to be able to hunt, fish, paddle, and visit the watershed? The Alliance has answered yes. The proposal has answered yes. Continued recreational use is explicitly part of the proposal’s stated objectives. On the access question, the framing is unnecessary, because the answer is already yes.

The illegitimate concern under the same banner is whether to leave portions of the watershed open to mineral exploration and extraction so that Manitoba does not “give up” potential mining revenue. This is a different question, and dressing it as “balance” obscures it. The watershed has uranium deposits in the west, diamonds in the east, and gold in the south-central portions. None are currently being developed. None can be developed without doing meaningful damage to the very ecological values the proposal exists to protect. The “balance” argument, in this version, is not asking for proportionality, it is asking for permission to convert a large fraction of the IPCA’s value into tradeable mineral rights inside the protected boundary.

The right response to that argument is not to relitigate the IPCA boundary. The right response is to point out that the trade is already available, somewhere else. The “balance” Manitoba should be looking for is across the province, not inside the watershed. There are mineral districts where development is already viable, already permitted, already part of Indigenous workforce relationships, already supported by federal and provincial critical-minerals frameworks. If the policy concern is that Manitoba’s mining economy needs more, not less, the answer is: agreed, and here is where it should be supported.

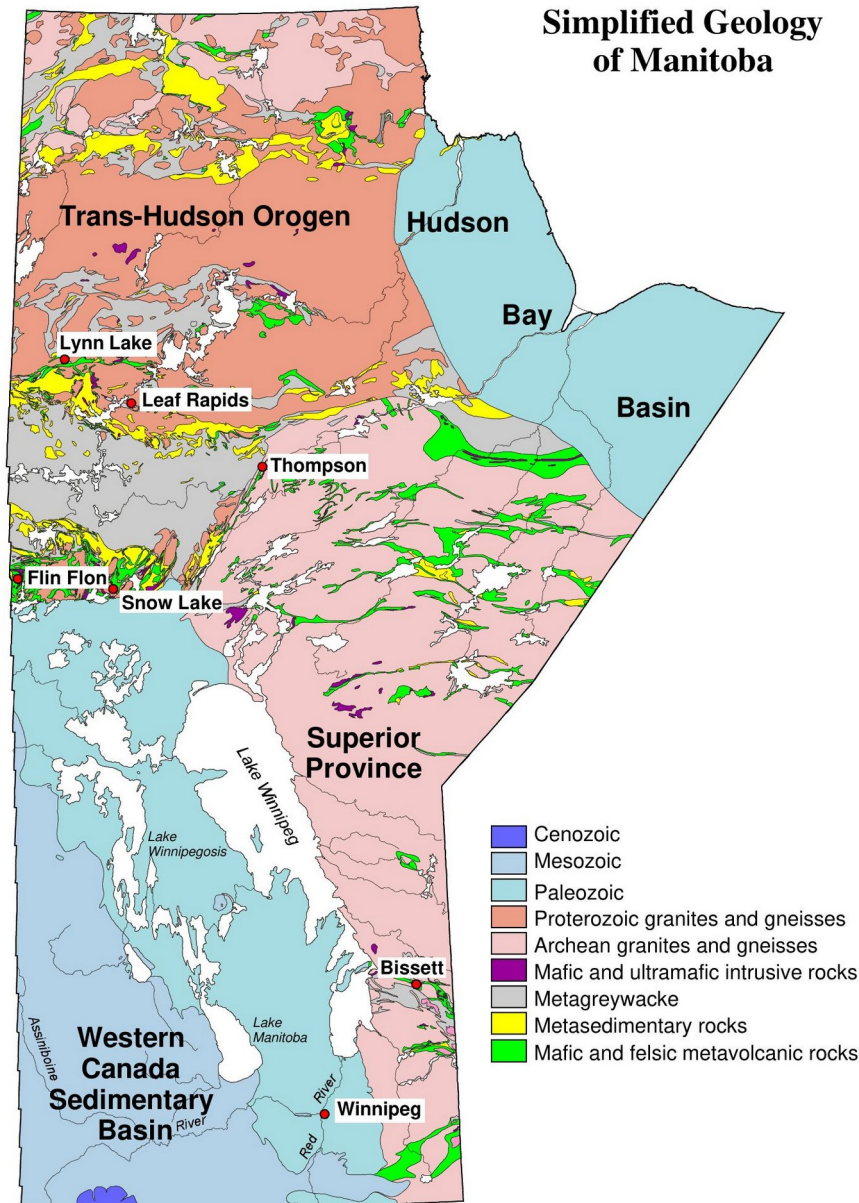
That is the compact this submission asks for. It is a response, not a deflection. It says yes to the industry’s underlying interest, predictability, scale, capital attraction, durable government support, by directing that yes to the places where it serves both economic and conservation goals at once.

### **3.3 The mineral belts that should be designated**

If the Seal River Watershed is the place that is definitively closed to mineral development, the mineral belts of Manitoba's two great geological provinces should be, publicly, explicitly, and with federal and provincial policy backing, identified as definitively open and supported. The list that follows is organized by geological province, drawing on the public record of the Manitoba Geological Survey and the long history of resource development across the province.<sup>1</sup> Some of these belts are mature and producing; some are historic and ready for revitalization; some are early-stage and prospective. All belong inside the Greenstone Parks framework proposed in Section 3.6, Manitoba's signature designation for the working and prospective core of its mineral economy.

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<sup>1</sup> Geological province assignments, belt boundaries, and host-rock classifications throughout Section 3.3 follow the Manitoba Geological Survey's *Bedrock Geology of Manitoba* compilation and the *Simplified Geology of Manitoba* reference reproduced as Figure 5. Specific commodity inventories and producing-mine attributions reference publicly available corporate disclosures from the named operators (Vale Canada Limited, Hudbay Minerals Inc., Sinomine Resource Group, Foran Mining Corporation, Alamos Gold Inc.) as of May 2026. Readers are referred to the Manitoba Geological Survey at [gov.mb.ca/iem](http://gov.mb.ca/iem) for authoritative current data, and to the Manitoba Critical Minerals Strategy for the provincial policy framework within which these designations would sit.



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Figure 5. Simplified geology of Manitoba. Source: Manitoba Geological Survey (gov.mb.ca/iem). The named mineral belts of the Greenstone Parks framework sit within the Trans-Hudson Orogen (Churchill Province) in northern and west-central Manitoba, Lynn Lake, Leaf Rapids, Thompson, Flin Flon, Snow Lake, and within the Superior Province in the south and east, where Bissett anchors the Rice Lake Belt and the Bird River Belt hosts the Tanco Mine. The Seal River Watershed lies in the Hudson Bay Basin to the northeast, geologically and

geographically distinct from the named mineral belts. Protection in the watershed; mining in the belts.

### *Churchill Province (northern Manitoba), Paleoproterozoic belts*

These Paleoproterozoic belts host primarily base metals (copper, zinc) and gold, and have been the backbone of Manitoba's northern mining economy for nearly a century.

**Flin Flon – Snow Lake Belt.** One of the world's premier Volcanogenic Massive Sulphide (VMS) districts, straddling the Manitoba–Saskatchewan border in west-central Manitoba and extending east into the Snow Lake camp. The active mining areas include Flin Flon (copper, zinc, gold), Snow Lake (gold, zinc, copper), and the historic Sherridon copper-zinc operation. The district's flagship operation today is Hudbay Minerals' Lalor Mine at Snow Lake, among the most productive base-metal mines in Canada, and the recently restarted New Britannia gold mine. Hudbay Minerals' 777 Mine at Flin Flon, the long-standing flagship of the western part of the belt, ceased operations in 2022 after a productive run; the workforce, the smelter and processing capacity, and the capital base in the region remain substantial, and several development-stage projects (including Foran Mining's McIlvanna Bay deposit on the Saskatchewan side) point to the district's continuing productive future. Copper and zinc are critical minerals; gold is a strategic mineral and foreign-currency earner. The existing infrastructure, roads, power, smelter capacity, skilled trades, decades of geological knowledge, represents a public-goods endowment that would be expensive to recreate elsewhere and that Manitoba should treat as the strategic asset it is. The Indigenous communities of the region, particularly Mathias Colomb Cree Nation in the Snow Lake area, have established workforce and partnership relationships with the industry.

**Lynn Lake Belt.** A 125-kilometre belt in northwestern Manitoba known for nickel, copper, and gold. Active and historic mining areas include Lynn Lake and Farley Lake; the MacLellan Mine and the historic Farley Lake gold deposit anchor the district. Alamos Gold's Lynn Lake project, currently advancing toward construction, will be a significant addition to Manitoba's gold-mining pipeline; nickel and copper from the broader belt are critical minerals on Canada's strategic list.

**Rusty Lake Belt.** Hosts the historic Ruttan Mine, once a major copper and zinc producer. The belt remains prospective for VMS-style mineralization and represents a future-development opportunity in the same metallogenic family as Flin Flon – Snow Lake.

**Fox River Belt.** A linear belt in northeastern Manitoba targeted for nickel and platinum-group elements. Both are critical minerals on Canada's strategic list, with sharply rising demand driven by the global energy transition.

## *Superior Province (southern and eastern Manitoba), Archean belts*

These older Archean belts are major sources of gold and of critical minerals like lithium, tantalum, and cesium.

**Rice Lake Belt.** Part of the prolific Uchi domain, this is Manitoba's largest gold-producing region. Mining areas include Bissett and Beresford Lake; the True North (San Antonio) Mine at Bissett is the historical anchor of the belt and remains a focus for renewed gold development.

**Bird River Belt.** Famous for world-class rare-element pegmatites. The Bernic Lake mining area hosts the Tanco Mine, for decades the western world's largest producer of tantalum, the host of one of the world's largest cesium deposits, and now the site of active lithium development. Lithium is the central critical mineral of the energy transition; tantalum and cesium remain strategic minerals with limited alternative supply. The belt's proximity to existing transportation infrastructure and to the Manitoba power grid further enhances its strategic value. Manitoba's policy posture should treat it as a national-scale critical-minerals asset.

**Island Lake and Gods Lake Belts.** Eastern belts hosting numerous gold and nickel occurrences. Mining areas include Gods Lake and Island Lake; notable deposits include Monument Bay and the historic Gods Lake Mine.

**Oxford Lake – Knee Lake Belt.** The largest contiguous belt in the northern Superior province, currently a focus for gold exploration and a meaningful frontier for the next generation of Manitoba gold development.

## *Churchill–Superior Boundary*

**Thompson Nickel Belt.** Located at the Churchill–Superior Boundary in north-central Manitoba, the Thompson Nickel Belt is one of the world's most significant nickel-producing districts and has been the backbone of Manitoba's mining economy for more than sixty years. Vale operates the Thompson nickel mine and mill, centred on the city of Thompson. The surrounding region supports a workforce of several thousand and a network of Indigenous communities, including Nisichawayasihk Cree Nation, that have built employment and partnership relationships with the mining industry. Nickel and cobalt are on Canada's Critical Minerals list, and demand for both is forecast to rise sharply with the global energy transition. Manitoba's policy posture on the Thompson Nickel Belt should be unambiguous: open, supported, and a strategic priority for the province and the country.

**Southern extension of the Thompson Nickel Belt.** The Thompson Nickel Belt does not stop at the producing mine. The metallogenic province extends southward into the Manitoba Lowlands, the same area the federal government's 2017 Lowland National Park proposal would have overlaid, and the same area I argued at the time should remain open to the resource economy because the orebody beneath it is real. The southern extension is geologically continuous with the producing belt to the north and is, in resource terms, one of the most prospective nickel and

cobalt frontiers in the province. It has not yet been developed at scale, and its development requires the same kind of stable, public, predictable policy framework that the existing Thompson belt has had for sixty years. Naming the southern extension explicitly, separately from the existing producing belt, as part of the Greenstone Parks framework signals to industry and to Manitobans that the southern extension is open, supported, and not at risk of being overlaid by a poorly sited conservation proposal. This is the place where the 2017 case directly bears on the 2026 policy moment.

### *Other notable belts*

**Cross Lake Belt.** Known for its titanium and vanadium potential. Both are critical minerals, with applications in steelmaking, aerospace, and energy storage. The belt represents a meaningful diversification of Manitoba's critical-minerals portfolio beyond the principal nickel, copper, zinc, gold, and lithium production.

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Together, these belts represent the working and prospective core of Manitoba's mineral economy. They are not a complete list of every mineral occurrence in the province; they are the geological framework around which Manitoba's resource sector has been organized for a century, and the framework around which the next century should also be organized. The Greenstone Parks framework proposed in Section 3.6 should formally designate each of them, alongside the Seal River Watershed IPCA, in the same announcement, by the same ministers, as Manitoba's signature land-use policy of this generation.

### ***3.4 Critical minerals, federal and provincial alignment***

The federal Critical Minerals Strategy, released in December 2022, anchored a \$3.8 billion fund and identified a list of minerals, including nickel, cobalt, copper, lithium, tantalum, zinc, and gold among others, as essential to Canadian economic and security interests. The Manitoba Critical Minerals Strategy, released subsequently, identified Manitoba's role as a strategic supplier of nickel, cobalt, copper, zinc, lithium, tantalum, and rare earth elements among other minerals on the national list. The frameworks exist. The funds exist. The geological endowment in the named mineral belts is real, well-mapped, and in many cases under active development.

What is missing is the explicit pairing with the Seal River protection. The risk is that the Seal River announcement is read by the mining industry, by capital markets, and by the provincial public as a one-way move, protection without a corresponding signal of where development is supported and accelerated. That reading is wrong on the policy substance, but it can become correct in political effect if the federal and provincial governments do not deliberately counter it.

The way to counter it is straightforward. Pair the announcement. State publicly that the Seal River Watershed is closed and the named mineral belts are open. Commit federal and provincial

policy backing to the second half, through the Critical Minerals Strategies, through dedicated funding allocations, through coordinated permitting and infrastructure decisions, and through public statements at the same political level as the Seal River announcement. The message to industry and the Manitoba public should be clear: the protection is real, the development support is real, and they are part of the same coherent provincial strategy.

### ***3.5 What this means for the Seal River consultation***

The compact has three operational components, and each gets a recommendation in this submission.

**Recommendation 8.** As part of, or contemporaneous with, the formal establishment of the Seal River Watershed IPCA, the Government of Canada and the Government of Manitoba should issue a joint public statement that does three things: (a) names the Seal River Watershed as definitively closed to mineral development; (b) names Manitoba’s named mineral belts as identified in Section 3.3 as definitively open and supported, with specific reference to their critical-mineral inventories; and (c) commits to the policy alignment, infrastructure investment, and federal–provincial coordination needed to make the second half of that distinction operationally real. The statement should be made at the ministerial level, in writing, and tabled in the relevant legislative chambers.

**Recommendation 9.** The Manitoba Critical Minerals Strategy should be updated, if not already aligned, to identify the Seal River Watershed as definitively closed to mineral development and Manitoba’s named mineral belts as definitively open and prioritized. The update should reflect the compact framing, protection in one place, accelerated and supported development in others, and should be coordinated with the federal Critical Minerals Strategy to ensure consistent treatment of the same districts at both levels of government.

**Recommendation 10.** The Government of Canada’s Critical Minerals Strategy funding allocations should include a Manitoba-specific component dedicated to the named mineral belts, with predictable multi-year funding for exploration support, geological survey investment, infrastructure (including roads, power, and rail/port connections to Churchill where applicable), workforce development in partnership with affected Indigenous communities, and regulatory coordination. The funding should be sized to be visibly proportionate to the conservation commitment being made on the Seal River file.

**Recommendation 11.** Manitoba should publish, annually, a public report on critical-mineral production from the named mineral belts: tonnage, value, employment, royalty and tax revenue, Indigenous partnership and workforce participation, and exploration and development pipeline activity. The report should be published at the same political level and on the same calendar as the Seal River IPCA’s annual report under Recommendation 15 of this submission. The two reports together, what is protected, what is produced, are the public accounting of the compact.

**Recommendation 12.** Federal and provincial regulatory and permitting frameworks for the named mineral belts should be reviewed for consistency, predictability, and time-boundedness, while preserving environmental assessment integrity. Industry’s reasonable interest in permitting predictability is a legitimate part of the compact; the protection on the Seal River file is durable in part because the development support elsewhere is reliable. Concrete steps, a published service standard for permitting timelines, coordinated federal–provincial environmental assessment processes for projects in the named mineral belts, and a single-window contact for industry, should be developed and announced as part of the broader compact.

The argument of this section is not that Manitoba should pick between Seal River and these districts. The argument is the opposite: Manitoba should pick *both*, in different places, at the same time, and say so out loud.

### ***3.6 The Greenstone Parks framework: a public brand for Manitoba’s working mineral economy***

The compact has a clear “no”, no mining inside the Seal River Watershed. It also needs an equally public, equally durable, equally branded “yes.” That is the missing piece in the current proposal, and it is the piece this submission asks the Government of Manitoba and the Government of Canada to supply.

I propose that Manitoba’s named mineral districts, Manitoba’s named mineral belts as identified in Section 3.3, be formally designated as *Manitoba’s Greenstone Parks*. The designation should be parallel in political weight, public branding, and statutory permanence to the Seal River Watershed Indigenous Protected and Conserved Area. The two designations should be announced together, in the same year, at the same ministerial level. Manitoba’s signature land-use policy of this generation should not be the IPCA alone; it should be the IPCA paired with the Greenstone Parks. Conservation where it belongs. Mining where it belongs. Both designated. Both branded. Both durable.

A note on the origin of the concept. The idea of pairing Seal River Watershed protection with publicly designated mineral-development areas, what I am now proposing as *Manitoba’s Greenstone Parks*, is not new in my advocacy. On November 29, 2018, in my Throne Speech reply on the floor of the Manitoba Legislature, I proposed “*mining parks*” as an out-of-the-box approach pairing conservation and mineral development, in the same passage in which I called for a Indigenous-led “*canoe park*” over the entire Seal River Watershed. The 2018 reply put it this way: “*Working with the First Nations there is an opportunity that comes once in a civilization, that is to create a canoe park: where people will be able to drink the water from the side of their canoe.*” And, in the next paragraph: “*another approach may be to create ‘mining parks’ as previously mentioned... any future parks including the Seal River watershed should be a showcase of where the environment and mining can co-exist in the 21st century.*” The Greenstone Parks framework in this submission is the 2026 operationalization of that 2018

proposal, refined in light of the federal Critical Minerals Strategy, the formation of the Seal River Watershed Alliance, and the policy moment now in front of Manitobans. The legislative record is in Appendix B of the documentary record companion to this submission.

A note on the term. “Greenstone” is geologically accurate for the Flin Flon, Bird River, and Lynn Lake belts, where greenstone is the literal host rock. It is not strictly accurate for the Thompson Nickel Belt, where the host is an ultramafic intrusion in a different geological setting. I am proposing “Greenstone Parks” as a *policy brand*, not as a geological classification, the brand applies to the framework Manitoba and Canada commit to, not to every host rock in every park. The naming choice is deliberate. It connects Manitoba’s mineral economy to the country’s recognizable conservation vocabulary, and it asks the public to see the working mineral districts the way the working mineral districts deserve to be seen, as designated, planned, legitimate, durable spaces, not as wherever industry happens to be operating at the moment.

A note on “Parks.” Some readers will find it unconventional to apply the word *park* to mineral-development areas. The choice is intentional. *Industrial park* is a long-established term in North American policy; *technology park* and *research park* extend the concept; *Greenstone Parks* extends it further, into the resource-extraction context where Manitoba’s economy actually lives. The brand says: this is where Manitoba mines, and Manitoba is unambiguous about it. Industry gets predictability. Capital gets a signal. Affected Indigenous communities get visibility and partnership standing. The public gets to see the trade clearly: the IPCA on one side, the Greenstone Parks on the other, both protected, both supported, both real.

A note on fast-track and environmental assessment. The fast-track permitting that the Greenstone Parks designation enables must be, and will be perceived as, *process efficiency, not lower standards*. The acceleration is in coordination, predictability, and the elimination of duplicative process, not in any reduction of environmental review. Project-level environmental assessment, public consultation, and Indigenous consent and partnership requirements remain fully in force inside the Greenstone Parks. What changes is the structure around the assessment: pre-cleared regional baselines, coordinated federal–provincial review, statutory time-bound decisions for non-environmental permits, and a single-window industry intake. Industry gets the predictability the compact promises; the public gets the full environmental review the law requires; affected Indigenous communities get partnership rights from the design stage forward, not bolted on after a project is announced.

**Recommendation 13.** The Government of Manitoba, in coordination with the Government of Canada, should formally establish *Manitoba’s Greenstone Parks*, a designated framework covering Manitoba’s named mineral belts as identified in Section 3.3, parallel in political weight, public branding, and statutory permanence to the Seal River Watershed Indigenous Protected and Conserved Area. The Greenstone Parks framework should include the following elements:

- (a) **Public designation.** Each Greenstone Park should be formally designated in provincial legislation and identified in the Manitoba Critical Minerals Strategy, with published maps

showing the park's boundary, mineral inventory, existing producing operations, and development pipeline.

- (b) **Fast-track permitting, process efficiency, not lower standards.** Inside each Greenstone Park: pre-cleared regional environmental and social baseline assessments that individual project permits build upon, eliminating duplicative baseline studies; coordinated federal–provincial environmental assessment processes that avoid duplicative review; statutory time-bound decision deadlines for non-environmental permits (with deemed-approval provisions where reasonable); a single-window provincial industry intake to coordinate all approvals; and published service standards for permitting timelines. Project-level environmental assessment, public consultation, and Indigenous consent and partnership requirements remain fully in force.
- (c) **Indigenous co-design and partnership.** Each Greenstone Park should be designed with the affected Indigenous communities, including, but not limited to, Nisichawayasihk Cree Nation in the Thompson Nickel Belt and Mathias Colomb Cree Nation in the Snow Lake camp, as co-designers of the framework's terms and as primary partners in any project advancing within the park. The Indigenous-partnership posture inside the Greenstone Parks should be as deliberate, and as protected in legislation, as the Indigenous-led posture inside the IPCA.
- (d) **Public reporting by park.** The annual Manitoba critical-mineral district production report (Recommendation 11) should be expanded to report by Greenstone Park, with each park's tonnage, value, employment, royalty and tax revenue, Indigenous partnership and workforce participation, and exploration and development pipeline activity disclosed publicly each year. Manitobans should be able to see the productive return from each designated park, in the same way they see the conservation return from the IPCA.
- (e) **Statutory permanence.** The Greenstone Parks designation should be set in legislation, not policy, alterable only by a fresh legislative process, not by ministerial discretion. Just as the IPCA designation provides durability for protection, the Greenstone Parks designation provides durability for development. Capital responds to durability. The protection of the Seal River will be more, not less, secure once the working mineral districts have a designation of equal weight.
- (f) **Joint announcement with the IPCA.** The Greenstone Parks designation should be announced contemporaneously with the formal establishment of the Seal River Watershed IPCA, by the same ministers, in the same legislative chambers, on the same day. The announcement should explicitly frame the two designations as halves of one policy: protection where it belongs, development where it belongs, both branded, both durable, both Manitoba's.

The Greenstone Parks framework is the policy companion to the Seal River IPCA. Both arise from the same honest siting principle. Both deserve permanent, public, statutory recognition. Together, they are the signature land-use policy this generation of Manitobans should hand to the next.

### ***3.7 The synergy: a strong economy and a healthy environment require each other***

The deepest argument for the compact, and the one I want to make explicit, is the synergy. The best way to protect the environment, in the long run, is to have a strong economy. The best way to have a durable, prosperous economy, in the long run, is good environmental rules and competent environmental management. The two are not in tension. They reinforce each other.

A wealthier Canada is a Canada that can afford to set aside more land for protection. A wealthier Canada is a Canada that can fund high environmental standards, that can pay for proper remediation when something goes wrong, that can invest in monitoring and enforcement and Indigenous Guardian programs and the slow, expensive, careful work that durable conservation actually requires. A Canada that hollows out its critical-minerals industry to make environmental announcements ends up with neither the environment nor the wealth. The protection lasts only as long as the political wind that announced it.

Manitoba has an embarrassment of riches. Fifty thousand square kilometres of intact boreal watershed in the Seal River, the four First Nations whose ancestral territory it is, and a critical-minerals endowment of national strategic importance: nickel and cobalt in the Thompson Nickel Belt, copper and zinc and gold and silver in the Flin Flon and Snow Lake camps, lithium and tantalum and cesium in the Bird River Belt, gold in the Lynn Lake district, titanium and vanadium in the Cross Lake belt, and the rest. Manitoba does not have to choose between any of these. Critical minerals are essential to a strong Canadian economy. Intact watersheds are essential to a healthy Canadian environment. The plan in this submission allows Manitoba to do something more remarkable than any single conservation announcement or any single mining announcement could deliver on its own: gift to the world an untouched virgin watershed and, at the same time, the critical-mineral endowment of a glorious future.

That is the synergy. That is what the mining-conservation compact, paired with the Greenstone Parks framework, is designed to honour. Conservation where it belongs, supported by a strong economy. Mining where it belongs, supported by competent environmental rules. Mindful mining everywhere it is done in Canada. Both halves of the compact, working together, are the only known way to deliver either half on its own.

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## IV. Implementation, funding, and accountability

### 4.1 *The federal and provincial commitments*

Canada has committed \$74.7 million over eleven years and \$7.9 million in ongoing funding to the establishment of the Seal River Watershed IPCA and national park reserve, as part of the *Force of Nature* strategy announced March 31, 2026. Manitoba has committed \$4 million to a long-term endowment.

These are meaningful figures. They are also, like all multi-year fiscal commitments, exposed to political risk. Governments change. Budgets are restated. Deferred capital becomes lapsed funding. The structure of the commitment matters as much as the magnitude.

### 4.2 *Endowment, not annual appropriation*

**Recommendation 14.** The federal \$74.7 million commitment, or a substantial portion of it, should be structured as a permanent endowment held jointly by the Alliance and the joint management board, rather than as annual appropriations subject to budget cycle revision. The endowment should generate operating revenue indefinitely, insulating the IPCA's core operations from political budget pressure. The Manitoba \$4 million endowment is the correct precedent; the federal commitment should match its structure.

This is not unusual. National-park-equivalent designations in other jurisdictions are routinely funded through endowed structures. The Conservation Trust model used by The Nature Trust of Manitoba and similar bodies is well-understood and proven. Translating a multi-year appropriation into an endowment requires legislative drafting but no novel policy invention.

### 4.3 *Public reporting and accountability*

**Recommendation 15.** The joint management board should be required to publish, annually, a public report covering: (a) the status of the management plan and any changes proposed or enacted; (b) financial flows in and out of the IPCA's operating budget and endowment; (c) ecological monitoring indicators including species-at-risk population trends and water quality; (d) any incidents of unauthorized activity within the IPCA boundary; and (e) any external pressure to alter protection (lobbying contacts, ministerial correspondence, formal proposals to amend protection). Transparency at this level serves the Alliance, the watershed, and the public interest. As noted in Recommendation 11, this report should be released alongside Manitoba's annual critical-minerals district report; together they constitute the public accounting of the compact described in Section III.

#### **4.4 Statutory deadlines**

**Recommendation 16.** The establishment agreement should be completed within 18 months of the close of this consultation (i.e., by approximately December 2027). The management plan should be in force within 36 months (i.e., by approximately June 2029). Both deadlines should be specified in the establishment legislation rather than left to ministerial discretion. The watershed has been waiting since 1987 for the protection now on the table; further indefinite delay will erode public attention and operational momentum.

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### **V. Boundary changes, Sand Lakes, Caribou River, and Baralzon Lake**

The proposal includes modifications to the boundaries of Sand Lakes Provincial Park, Caribou River Provincial Park, and the Baralzon Lake Ecological Reserve to align with the IPCA. I support these modifications. They are necessary for ecological coherence and administrative practicality; the IPCA cannot function with overlapping or contradictory boundaries among existing protected areas.

**Recommendation 17.** The integrated boundary map, covering the IPCA, the federal national park reserve, the Manitoba provincial park, and the modified boundaries of Sand Lakes, Caribou River, and Baralzon Lake, should be reviewed by independent ecologists and cartographers (drawn from Manitoba universities and from organizations such as CPAWS Manitoba, the Canadian Parks Council, or equivalent) before the establishment agreement is finalized. Any boundary refinements identified through that review that strengthen ecological coherence should be incorporated.

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### **VI. Visitor stewardship and access, the “earn your way in” principle**

The proposal correctly identifies hunting, fishing, hiking, and paddling as activities to be supported within the IPCA. The submission’s sixth theme is to make specific recommendations on *how* those activities should be governed, so the watershed retains the wilderness character that makes it worth protecting in the first place. The protection is only as strong as the use regime that surrounds it. Get the use rules wrong and the IPCA becomes a paper designation; get the use rules right and the watershed will outlast all of us.

I bring to this section two relevant pieces of background. The first is the speech I made on November 9, 2017, in which I described the Seal River Watershed as a place where you should have to “*earn your way into paradise*”, land at Lac Brochet outside the watershed and paddle in, under your own power. That phrasing was not rhetorical decoration. It was a deliberate

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description of what protection should require of the people who visit. The second is my personal experience as a wilderness canoeist before 1996. I paddled and portaged in a number of Manitoba and Ontario wilderness areas over many years, and visited remote fishing lodges in similar country.

The single clearest pattern across that experience was this: where motorboats reach, the shoreline is a mess, fuel cans, food packaging, fish entrails, broken glass, fire scars outside designated rings, human waste sited too close to water. Where motorboats do not reach, the shoreline is clean. The pattern held in unmanaged country and in commercially managed lodges alike. It is not about the character of motorboat operators or the absence of character in paddlers. It is about how access shapes use. Effort confers ownership of a place; motorized access removes that effort, and the place absorbs the consequences.

There is also a self-selection at work that is worth naming. Serious paddlers do not carry glass bottles, aluminum cans, or other heavy disposable packaging into wilderness country, because they have to portage the weight. The trash that turns up at remote shorelines is, almost without exception, not canoeist trash. It is the trash of people who reached the shoreline without paddling. A paddle-only access regime is, among other things, the simplest possible enforcement mechanism for the leave-no-trace standard the IPCA needs.

The Seal River Watershed is, today, almost entirely free of motorized recreational access, and the shoreline reflects it. Protecting that condition is partly about access rules and partly about the enforcement of standards on the visitors who are admitted. Both are needed. Both are addressed in the recommendations that follow.

### **6.1 The Mantario Wilderness Zone, Manitoba's own precedent**

Manitoba already operates a wilderness zone under exactly the access regime the Seal River IPCA should adopt. The Mantario Wilderness Zone, within Whiteshell Provincial Park, is administered under *The Provincial Parks Act* on the explicit principle that “*intensive forms of recreational development such as cottaging, and the use of snowmobiles, motor-boats and aircraft for recreational purposes are not permitted in the Mantario Wilderness Zone.*” Motor vehicles within the wilderness zone are prohibited except by ministerial permit. The zone is paddle-in only.

Mantario has been managed under this regime for decades. The model works. Manitoba already understands how to administer it. Provincial Parks Branch staff already have the operational experience and the legal toolkit. Adopting the Mantario standard for the Seal River IPCA, at the scale of an intact 50,000-square-kilometre watershed, would not be a policy invention. It would be the application of an existing Manitoba standard to the place where it matters most.

## **6.2 Quetico Provincial Park, the gold-standard Canadian precedent**

In 1979, Ontario closed Quetico Provincial Park to all motorized recreational use. Quetico is approximately 4,800 square kilometres of paddle-in-only canoe wilderness, accessed through a small number of ranger stations and defined entry points. Group sizes are capped at nine. Container restrictions limit what visitors can bring in. The model has been operating for forty-six years. Quetico's surface waters remain among the cleanest of any populated continent.

Indigenous subsistence and traditional use was preserved through a specific exemption: members of the Lac La Croix Guides Association, of the Lac La Croix First Nation, may operate motors of up to ten horsepower on a defined set of lakes within the park. The Indigenous-use carve-out is administered by the Lac La Croix First Nation through the Guides Association, that is, by the Indigenous community itself, not by the park agency.

The Quetico model is the most directly applicable Canadian precedent for what the Seal River IPCA should look like, except that the Seal River Watershed is roughly ten times larger, and the case for stricter protection is correspondingly stronger.

## **6.3 IUCN Category Ib, the international standard**

The International Union for Conservation of Nature defines Category Ib (Wilderness Area) as “*large unmodified or slightly modified areas, retaining their natural character and influence, without permanent or significant human habitation, which are protected and managed so as to preserve their natural condition.*” The category's stated objectives include biological intactness and the absence of permanent infrastructure, extractive industries, agriculture, motorised use, and other indicators of modern or lasting technology.

The Seal River Watershed today meets the Category Ib standard. The objective of this submission, on this point, is straightforward: the IPCA, the federal national park reserve, and the Manitoba provincial park within it should all be designated and managed to the Category Ib standard, deliberately, in the establishment agreement and the management plan.

## **6.4 The Indigenous-use carve-out**

Before stating the recommendations, I want to be explicit about what they do not address. The Sayisi Dene Denesuline, the Northlands Denesuline, the Barren Lands, and the O-Pipon-Na-Piwin Cree have used motorized boats, snowmobiles, and floatplanes for subsistence, traditional, and ceremonial purposes within the watershed since those technologies became available. That use is not recreational. It is integral to the way of life the IPCA designation exists to protect. Any restriction on motorized recreational access must be carefully and explicitly limited so that Indigenous traditional and subsistence use is unaffected.

The Quetico precedent, where the Lac La Croix First Nation's continued motorized use is recognized through an exemption administered by the First Nation itself, offers a tested model. The Alliance is the proper authority to set the terms of Indigenous use within the watershed. The recommendations below are about *non-Indigenous recreational and commercial* access. Indigenous use, governed by the Alliance under the Alliance's own protocols, is outside the scope of these restrictions and should be explicitly carved out in the establishment legislation.

### **6.5 Specific recommendations on access and use**

**Recommendation 18.** The IPCA's recreational and commercial access regime should be modelled on IUCN Category Ib (Wilderness Area) standards, with the Mantario Wilderness Zone and Quetico Provincial Park as the operational precedents. The Mantario standard should be the floor; the Quetico model should be the practical reference.

**Recommendation 19.** Leave-no-trace, pack-it-in-pack-it-out camping should be the universal standard for all non-Indigenous visitors to the IPCA, codified in the management plan as a plain-language best-practices framework on the following terms:

- (a) Anything carried in must be carried out, all food packaging, food waste, fishing line, broken or worn-out gear, and human-generated trash of every kind. What goes in comes out.
- (b) No plastic bottles, glass bottles (including beer bottles), aluminum cans, or other single-use disposable containers permitted within the IPCA boundary, modelled on the Quetico precedent. Reusable containers required for liquids and provisions.
- (c) No soap of any kind used in or near water bodies, including biodegradable soaps. Cutlery, dishes, and personal washing should be done with rinsate carried at least 70 metres from the shoreline.
- (d) Human waste buried in catholes at least 70 metres from any water body, trail, or campsite, in compliance with Leave No Trace Canada specifications. Toilet paper packed out, or buried alongside the waste where pack-out is not practical.
- (e) Group sizes capped at nine, matching the Quetico standard.
- (f) Fires permitted only by ground-fire methods, or with portable fire pans carried in and out by the visitor, consistent with the local fire-hazard rating; all wood gathering limited to dead-and-down material. Any temporary fire ring constructed by a visitor must be fully dispersed, the rocks returned to their natural setting, and the burn site naturalized before departure. No fire rings, neither pre-existing nor visitor-built, should remain on the landscape after a party leaves. The wilderness-camp principle, familiar to a generation of Manitoba paddlers, is straightforward: when you leave, no one should be able to tell you were there.

- (g) No permanent fire rings, garbage facilities, latrines, or other fixed waste-management infrastructure installed within the IPCA, except at the small number of designated entry points outside the watershed boundary. The IPCA should not host the kind of front-country infrastructure that habituates visitors to expect the place to absorb their waste.

The standards above should be communicated to every visitor at the access-point briefing required by Recommendation 20, and should be the operational expression of the wilderness ethic on which the entire access regime depends.

**Recommendation 20.** The leave-no-trace standard set in Recommendation 19 must be operationally enforceable, not aspirational. The management plan should establish, at minimum, the following enforcement mechanisms:

- (a) A mandatory pre-trip permit for all non-Indigenous visitors entering the IPCA, issued only after a documented leave-no-trace briefing and the visitor's signed acknowledgment of the standards in Recommendation 19.
- (b) A refundable security deposit or bond paid at the access-point stage and returned only after the visitor's pack-out is verified at exit (or, where exit is at a different access point, by photo-documented inventory matching the entry manifest).
- (c) Random spot inspections of campsites, group equipment, and pack-outs by Alliance, federal, and provincial parks staff working under the joint management board, with inspection results reported in the joint management board's annual public report (Recommendation 15).
- (d) Graduated penalties for documented non-compliance, ranging from forfeiture of the security deposit through fines, multi-year revocation of permit privileges, and, where warranted, prosecution under the *Canada National Parks Act* or *The Provincial Parks Act*.
- (e) Certification standards for any commercial guides or outfitters operating with Alliance approval, including required leave-no-trace training and individual liability for client compliance with the standards in Recommendation 19.
- (f) Annual independent audit of compliance rates and enforcement actions, with results publicly reported as part of the joint management board's annual report.

The Mantario Wilderness Zone and Quetico Provincial Park each operate variants of this framework with decades of demonstrated effectiveness. The Seal River IPCA should adopt the strictest combination of their enforcement provisions and operate it at the scale the watershed warrants. Without enforcement, the standards in Recommendation 19 are decorative; with enforcement, they become the durable practice on which the watershed's intactness rests.

**Recommendation 21.** Recreational motorboat access by non-Indigenous visitors should be prohibited within the IPCA boundary. Canoe and kayak access only. Visitors should enter the watershed through a small number of designated access points: Lac Brochet (Northlands Denesuline), Brochet (Barren Lands), or South Indian Lake (O-Pipon-Na-Piwin Cree), all of which sit outside the watershed boundary and require visitors to paddle in under their own power; or the Sayisi Dene community of Tadoule Lake, which sits inside the watershed and serves as the practical air gateway, where visitors arrive under Alliance-approved hosting protocols and then paddle out from the community on their own power. The “*earn your way into paradise*” principle I described in November 2017 applies the moment a visitor puts paddle to water, whether that is at the watershed boundary or at the host community inside it. The Mantario, Quetico, and Wabakimi precedents all operate on the same logic: a small number of designated entry points, paddle-only thereafter. My direct field experience over many years is that motorboat access and shoreline degradation are tightly correlated: where motors reach, the shore is messy; where they do not, the shore is clean. The Seal River shoreline is currently clean. It should stay that way.

**Recommendation 22.** Recreational floatplane access by non-Indigenous visitors to interior lakes within the IPCA should be prohibited. Floatplanes deliver visitors directly to remote interior waters, eliminating the effort the access regime is designed to require. The only sanctioned air gateway should be the existing airstrip at Tadoule Lake, a permanent Sayisi Dene community whose scheduled and chartered air service is essential to community life and whose role as the practical visitor gateway is part of the Alliance’s Indigenous-led tourism and conservation-economy model. Visitors arriving by air at Tadoule should paddle out from the community under their own power, on the same terms as visitors arriving by paddle from Lac Brochet, Brochet, or South Indian Lake. Where overflight elsewhere in the IPCA is operationally necessary, emergency response, ecological monitoring, scientific research conducted with Alliance approval, Indigenous traditional use, it should be governed by the joint management board on a permit basis and counted, reported, and audited annually. There should be no general right of recreational floatplane access to interior lakes.

**Recommendation 23.** Recreational snowmobile access by non-Indigenous visitors should be prohibited within the IPCA boundary. The Mantario Wilderness Zone already prohibits recreational snowmobile use; the Seal River IPCA should adopt the same rule. Snowmobiles compact the winter habitat of barren-ground caribou and other species at risk identified in the proposal, and their noise carries for kilometres in the still winter conditions characteristic of the watershed.

**Recommendation 24.** Commercial fishing camps and lodges should be prohibited within the IPCA boundary. Where existing permitted operations predate the IPCA establishment, they should be wound down on a defined and reasonable timeline (e.g., five to ten years), with appropriate compensation to permit holders, rather than grandfathered indefinitely. Manitobans seeking guided wilderness fishing experiences are well served by an active provincial outfitter

sector elsewhere in the province; the Seal River Watershed is not the place to host a commercial fishing-camp economy. The watershed's fishery is part of the ecological intactness the IPCA is designed to preserve, not a tradeable commercial asset.

**Recommendation 25.** The Indigenous-use carve-out should be explicitly stated in the establishment legislation and in the management plan. Indigenous subsistence, traditional, and ceremonial use of the watershed, including motorized travel where the Alliance considers it necessary, is governed by the Alliance under its own protocols and is exempt from Recommendations 21 through 24. The non-Indigenous access regime exists alongside the Indigenous-use regime, not in competition with it. The Quetico Lac La Croix Guides Association precedent is a workable template for the legal language; the substance should be developed by the Alliance.

### ***6.6 Phased development of a designated day-hike network from the river***

The river is the only practical travel corridor through the watershed. Many of the most ecologically and geologically distinctive features of the Seal River Watershed, eskers, ancient beach ridges, raised peatlands, geological exposures, rare wetland complexes, and elevated vista points, lie at varying distances from the navigable waterways and cannot be experienced from a canoe alone. Other Canadian wilderness parks address this by maintaining sparse networks of light-touch day-hike routes accessible from designated water-based campsites or portages. Quetico, Wabakimi, and the major paddling rivers of northern Ontario and the Northwest Territories all use this approach. Without sanctioned routes, social trails form anyway through repeated foot traffic, and tend to do more cumulative damage than carefully sited and lightly maintained alternatives.

This is not a recommendation for trails on the day of establishment. The IPCA should be established and operating under its access regime first. Trail development, if it proceeds at all, should proceed in phases, on the Alliance's terms, and only after the management plan has been settled. The objective is to allow visitors to experience the ecological and geological features of the watershed that are inaccessible from the river alone, while maintaining the wilderness character on which the IPCA's value rests.

**Recommendation 26.** The management plan should provide a framework for the phased, Alliance-led development over time of a small number of designated day-hike routes from the river, on light-touch wilderness-trail standards. Wayfinding should be by cairns, inuksuit, or other natural marker forms approved by the Alliance and built from materials found on site, no flagging tape, no painted blazes, no plastic markers, no manufactured trail-marking material of any kind, no signage panels, and no information kiosks at trailheads. Routes should have no cut tread, no boardwalks, no benches, no shelters, no constructed steps, and no fixed infrastructure of any sort. Trail density should be kept low, a small number of routes, not a network. Routes should be selected by the Alliance with input from regional ecologists, archaeologists, and the

Elders of the four First Nations. Permits and use caps should be administered through the same access-point system as Recommendation 20. Seasonal closures should be keyed to caribou calving and other ecological constraints. Indigenous interpretive content should be incorporated where the Alliance approves, and only in the form the Alliance approves. No trail development should occur until the IPCA is established and the Alliance has approved the design and routing of any specific route. The objective is to deepen visitors' understanding of the country they have paddled to reach, not to convert the IPCA into a hiking destination, and not to leave a manufactured trail-marking system on a wilderness landscape.

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## **VII. A personal note**

I am writing this submission as a citizen, a former MLA, and a former MP. I am also writing it as someone for whom this watershed has a meaning that the policy language above does not capture.

I was a wilderness canoeist before a 1996 collision with a moose left me a C4 quadriplegic. The Seal River Watershed is not a place I will paddle myself. It is, however, a place that I want my nieces and nephews and the next generation of Manitoba paddlers to be able to reach. In my November 9, 2017 speech in the Manitoba Legislature, I described the watershed as a place where you should have to “earn your way in”, land at Lac Brochet outside the watershed and paddle in, under your own power, into one of the last intact watersheds left on Earth. I meant it then. I mean it now. The opportunity is gone for me. It is not gone for the people coming up behind us.

That is the personal frame inside which the policy recommendations above sit. The public consultation will receive submissions from organizations, from interest groups, from political actors, and from individual citizens. I want the record to show that one of those individual citizens is the person who first proposed this watershed's protection in a Canadian legislative chamber in November 2017, who returned to the case in print in 2018, who returned to the case again in the Manitoba Legislature in November 2018, and who now, in the year that decision is finally being made, supports the proposal on the table and asks the governments and the Alliance to make it durable enough to outlast everyone in this room.

I am also writing as a former member of Parliament who served seven years on Treasury Board and as a former MLA from a province whose mineral economy I understand from the inside. The mining–conservation compact in Section III is not boilerplate. It is the policy posture I have argued for, in legislative chambers and in print, since 2017. Manitoba can protect what is intact and develop what is developable. Doing both is possible. Doing both well is necessary. Saying so out loud is what this submission, in its third section, asks the partners to do.

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## Conclusion

I urge the Government of Manitoba, the Government of Canada, and the Seal River Watershed Alliance to:

1. Confirm and lock the IPCA boundary to the full hydrological watershed of the Seal River.
2. Convert the 2024 temporary mineral exploration moratorium into a permanent prohibition, coterminous with the IPCA, alterable only by Alliance consent on a consensus joint management board vote.
3. Formally invite the Government of Nunavut and Nunavut Tunngavik Incorporated into parallel discussions about complementary protection of the Nunavut portion of the Seal River Watershed, on terms that Nunavut and the Inuit of the Kivalliq Region set themselves; Canada to commit to supporting whatever protection regime Nunavut proposes.
4. Make consensus operation of the joint management board legally binding, not aspirational.
5. Limit review and sunset provisions to actions that strengthen protection, not weaken it.
6. Specify that recreational and subsistence use rules are set by the joint management board, with the Alliance holding effective veto.
7. Establish transparent, publicly disclosed, independently audited rules governing all forms of compensation paid to members of the joint management board from IPCA or endowment funds.
8. Issue a contemporaneous federal–provincial joint statement at the ministerial level naming the Seal River Watershed as definitively closed to mineral development and naming Manitoba’s named mineral belts as identified in Section 3.3 as definitively open and supported.
9. Update the Manitoba Critical Minerals Strategy to reflect the compact framing, protection in one place, accelerated and supported development in others, and align it with the federal Critical Minerals Strategy.
10. Allocate a Manitoba-specific component of the federal Critical Minerals Strategy to the named mineral belts, with predictable multi-year funding for exploration support, geological survey investment, infrastructure, workforce development in partnership with affected Indigenous communities, and regulatory coordination, sized to be visibly proportionate to the conservation commitment on the Seal River file.

11. Publish, annually, a Manitoba critical-mineral district production report, tonnage, value, employment, royalty and tax revenue, Indigenous partnership and workforce participation, exploration and development pipeline activity, alongside the IPCA's annual report under Recommendation 15.
12. Review federal–provincial regulatory and permitting frameworks for the named mineral belts for consistency, predictability, and time-boundedness, while preserving environmental assessment integrity, and announce concrete steps including service standards, coordinated environmental assessment, and a single-window contact for industry.
13. Formally establish *Manitoba's Greenstone Parks*, a designated framework covering Manitoba's named mineral belts as identified in Section 3.3, parallel in political weight, public branding, and statutory permanence to the Seal River Watershed IPCA, with public designation in legislation, fast-track permitting (process efficiency only, not reduced environmental review), Indigenous co-design and partnership, public reporting by park, statutory permanence, and joint announcement with the IPCA.
14. Structure the federal \$74.7 million commitment as an endowment, mirroring Manitoba's \$4 million endowment design.
15. Require annual public reporting from the joint management board on management, finance, ecology, and external pressure, released in coordination with the critical-minerals district report.
16. Specify statutory deadlines: establishment agreement within 18 months; management plan within 36 months.
17. Independent ecological and cartographic review of the integrated boundary before the establishment agreement is finalized.
18. Adopt IUCN Category Ib (Wilderness Area) standards for the IPCA's recreational and commercial access regime, with the Mantario Wilderness Zone and Quetico Provincial Park as operational precedents.
19. Codify leave-no-trace, pack-it-in-pack-it-out camping as the universal standard for non-Indigenous visitors, with plain-language best-practices including: no soap in or near water; no glass bottles, plastic bottles, or aluminum cans; human waste in catholes 70 metres from water; group sizes capped at nine; ground-fire methods or portable fire pans only, with any temporary fire ring fully dispersed before departure so no evidence remains; and no permanent waste-management infrastructure within the IPCA.

20. Make the leave-no-trace standard enforceable through mandatory pre-trip permits, refundable security deposits with verified pack-out, random spot inspections, graduated penalties, certified guides and outfitters, and annual independent audit of compliance rates.
21. Prohibit recreational motorboat access by non-Indigenous visitors within the IPCA, canoe and kayak access only, with entry through designated access points: Lac Brochet, Brochet, or South Indian Lake (paddle in from outside the watershed), or Tadoule Lake (Alliance-hosted air gateway inside the watershed, paddle out from the community).
22. Prohibit recreational floatplane access by non-Indigenous visitors to interior lakes within the IPCA; the existing Tadoule Lake airstrip is the sole sanctioned air gateway; operational overflight elsewhere by permit only, audited annually.
23. Prohibit recreational snowmobile access by non-Indigenous visitors within the IPCA.
24. Prohibit commercial fishing camps and lodges within the IPCA, with a defined wind-down timeline for any existing permitted operations.
25. Specify the Indigenous-use carve-out, subsistence, traditional, and ceremonial use governed by the Alliance, explicitly in the establishment legislation and management plan, exempting Indigenous use from Recommendations 21 through 24.
26. Provide a management-plan framework for the phased, Alliance-led development over time of a small number of designated day-hike routes from the river, on light-touch wilderness-trail standards: wayfinding by cairns, inuksuit, or other natural marker forms approved by the Alliance, built from materials found on site, no flagging tape, painted blazes, plastic markers, signage panels, or any manufactured trail-marking material; no cut tread, boardwalks, benches, shelters, or fixed infrastructure; low trail density; permits and use caps; seasonal closures keyed to ecological constraints; Indigenous interpretive content where, and only as, the Alliance approves.

The proposal in front of the public is, in its essential structure, the proposal I made nine years ago. It is now better than it was then because the four First Nations of the Alliance lead it, because the federal and provincial governments have joined that leadership, and because the public has the chance to weigh in. My recommendations are intended to make sure the version that survives this consultation is the version that lasts a century, not five years, not ten, and that the protection is paired with the explicit, public, well-resourced support for mineral development in the places where development belongs.

Whole-watershed protection. Indigenous-led governance. Honest siting of conservation and development. Endowed funding. Statutory accountability. A wilderness use regime worthy of the place, paddle in, leave no trace, earn your way. And, in the same year, at the same political level,

a public statement that names the Manitoba mineral districts that are open and supported, and the federal–provincial commitment to make that support real.

That is the watershed worth handing to the next generation. That is the mineral economy worth handing to it as well. That is the compact this submission asks for.

Respectfully submitted,

The Honourable Steven Fletcher, P.C., P.Eng. May 5, 2026

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## **Appendix: Public record of my advocacy on the Seal River Watershed and adjacent issues**

This appendix documents the public record of my prior commentary on the Seal River Watershed and on closely related questions of conservation siting and mining policy in northern Manitoba. It is divided into six parts: pre-legislative stakeholder engagement in spring 2017; legislative speeches; an authored op-ed; independent media coverage; a public presentation; and the Substack essay series being published over the public consultation window.

### ***A. Pre-legislative origin and stakeholder engagement (spring 2017)***

**A.1, Spring 2017 stakeholder meetings.** Convened jointly by Hon. Steven Fletcher (Independent MLA for Assiniboia) and Hon. Jon Gerrard (Liberal MLA for River Heights, former Liberal Party of Manitoba leader) as a cross-party effort. Participants included Sayisi Dene members from Tadoule Lake, environmental groups, ecotourism operators, mining and prospecting representatives, and *Winnipeg Free Press* reporter Bill Redekop. The meetings developed the case for moving federal conservation effort north to protect the Seal River Watershed as an alternative to the proposed Lowland National Park sited on the Thompson Nickel Belt extension. The whole-watershed protection proposal advanced in print starting June 2017, in the Manitoba Legislature on November 9, 2017, and in this submission, was substantially informed by what was heard from Sayisi Dene participants at those meetings, two years before the four First Nations would formally constitute themselves as the Seal River Watershed Alliance.

### ***B. Public commentary in the Manitoba Legislature***

**B.1, November 9, 2017.** Matter of Urgent Public Importance. The first formal proposal in any Canadian legislative chamber to preserve the entire Seal River Watershed. Spoken by Hon. Steven Fletcher, MLA for Assiniboia: *“I have long advocated for the preservation of the entire Seal River watershed. This is one of the few watersheds that has been untouched by human development... 50,000 square kilometres, larger than some European nations.”* And: *“Let’s*

*preserve the Seal River Watershed, just not for Manitobans, but for the world... in 200 years what will be more valuable, ore or clean water in an untouched watershed that's larger than most countries in Europe.” And: “This watershed is priceless. I would like it to become a canoe park... land in Lac Brochet outside the watershed and paddle in, earn your way into paradise.” Hansard, 41st Legislature, 2nd Session, Vol. 82B.*

[https://www.gov.mb.ca/legislature/hansard/41st\\_2nd/vol\\_82b/h82b.html](https://www.gov.mb.ca/legislature/hansard/41st_2nd/vol_82b/h82b.html)

**B.2, April 3, 2018.** Sustained advocacy on a watersheds-related bill, returning to the Seal River proposal: *“This bill, I’ll also mention, talks about watersheds. I presented to this place a suggestion of preserving the Seal River watershed. This is one of the few watersheds left in the world that has been untouched by human development, goes from Hudson Bay to almost to Tadoule Lake. It’s about 50,000 square kilometres, huge area. But it’s a unique opportunity. At present, there are no mining claims, there are no roads. The First Nations may be interested. I know the Dene have expressed interest in preserving that watershed, but we also have to create economic opportunity.”* Hansard, 41st Legislature, 3rd Session, Vol. 26A.

**B.3, November 29, 2018.** Throne Speech reply: *“The Seal River watershed offers the unique opportunity to protect 50,000 square kilometres of virgin wilderness.”* Hansard, 41st Legislature, 4th Session, Vol. 8.

[https://www.gov.mb.ca/legislature/hansard/41st\\_4th/vol\\_08/h08.html](https://www.gov.mb.ca/legislature/hansard/41st_4th/vol_08/h08.html)

**B.4, April 9, 2018 (adjacent record).** Estimates debate concerning the federal Lowland National Park proposal and the Thompson Nickel Belt extension: *“There’s lots of ways to protect the environment. Putting a national park on an ore body is not one of them.”* This intervention does not concern the Seal River Watershed directly. It is included here because it is the verified-record version of the siting argument that underlies Section III of this submission, that conservation protection should be sited where mineral potential is absent (the Seal River Watershed) and not where mineral potential is present (the Thompson Nickel Belt). The Seal River Watershed has no significant active mineral claims; the Thompson Nickel Belt was, and remains, an active mining region. *Hansard*, 41st Legislature, 3rd Session, Vol. 29.

[https://www.gov.mb.ca/legislature/hansard/41st\\_3rd/vol\\_29/h29.html](https://www.gov.mb.ca/legislature/hansard/41st_3rd/vol_29/h29.html)

### **C. Authored op-ed**

**C.1, October 23, 2018, *The Northern Miner*.** Authored commentary on Manitoba mining policy, the federal Lowland National Park proposal, and the case for siting conservation protection where it belongs, and not where it doesn’t. Identifies my four lenses on this work: *“It is through my activities as a naturalist, engineer, politician and canoeist, and my passion for sensible public policy decisions, that I believe it is possible for our mining industry to coexist with minimal impact on the environment.”* The piece sets out the same argument structure that informs Section III of this submission. *“Commentary: Mining industry in Manitoba is near*

collapse.” <http://www.northernminer.com/news/commentary-mining-industry-in-manitoba-is-near-collapse/1003800307/>

#### **D. Independent media coverage**

**D.1, June 7, 2017, *Financial Post*.** Earliest located media record of my advocacy on this issue. Article by Joseph Quesnel, “*The federal government wants to put a national park right where it will cost First Nations mine workers their jobs.*” The piece described the spring 2017 stakeholder meetings and quoted my proposal: “*Fletcher ... has suggested moving the proposed park north to protect the Seal River watershed, one of the few pristine watersheds in the world.*” This is the public debut of the whole-watershed protection argument I would make formally in the Manitoba Legislature five months later. <https://financialpost.com>

**D.2, June 9, 2017, *Frontier Centre for Public Policy*.** Republication and expansion of the same Quesnel argument: “*A Wrongly Placed National Park that will Cost First Nations Jobs.*” <https://fcpp.org/2017/06/09/the-federal-government-wants-to-put-a-national-park-right-where-it-will-cost-first-nations-mine-workers-their-jobs/>

**D.3, November 2017, *The Northern Miner*.** News pickup of the November 9 Hansard proposal, broadcasting the Seal River Watershed protection case to the national mining industry. The piece carried the proposal beyond Manitoba political circles and into the resource-industry trade press. “*MLA Steven Fletcher: Don’t create national park on Thompson Nickel Belt extension.*” <https://secure.northernminer.com/news/manitoba-mla-fletcher-dont-create-national-park-overtop-thompson-nickel-belt-extension/1003791338/>

#### **E. Public presentations and online advocacy**

**E.1, *Manitoba Forward* presentation.** Video remarks on Manitoba conservation, mining, and the Seal River Watershed, including the framing of “*200 years from now, what will be more valuable, ore or water?*” and an extended case for whole-watershed protection. <https://youtu.be/iLvqc1c3umA>

**E.2, *mindfulmining.earth*, *mindfulminingmanitoba.com*, and *mindfulminingcanada.com*.** A trio of personal websites making the public-facing case for what I call *mindful mining*, mineral development carried out thoughtfully, with full acknowledgment of geological economic potential alongside equally full attention to siting, environmental responsibility, Indigenous partnership, and the long-term durability of the policy framework. The three domains cover the universal (.earth), the provincial (Manitoba), and the national (Canada) scopes of the same argument. *Mindful mining should be done everywhere it is done in Canada and beyond.* The Greenstone Parks framework proposed in Section 3.6 of this submission, and the broader synergy described in Section 3.7, are the policy operationalization of the public-facing argument

these sites make. <https://www.mindfulmining.earth>, <https://www.mindfulminingmanitoba.com>, <https://www.mindfulminingcanada.com>

### ***F. Substack essay series, The Watershed I Can't Paddle, April–June 2026***

A six-piece Substack essay series, published at [stevenjohnfletcher.substack.com](https://stevenjohnfletcher.substack.com) over the April 17 – June 2, 2026 public consultation window so the public-facing argument for protection is available to readers during the period public input is being received. The series is anchored on the personal and historical record summarized in this submission and is written for a general audience rather than a policy one. It accompanies, but is distinct from, this submission to the formal consultation.

**F.0, Series announcement.** Anchors the series to the April 17, 2026 federal-provincial announcement and the public consultation window.

**F.1, Post 1: *Earn Your Way Into Paradise*.** The personal anchor.

**F.2, Post 2: *The Speech Nobody Listened To*.** The November 9, 2017 Hansard speech, in context.

**F.3, Post 3: *Naturalist, Engineer, Politician, Canoeist*.** The four lenses that made the case.

**F.4, Post 4: *Eight Years Later, What Actually Happened*.** The Alliance, COP15, the agreements, the feasibility study, the April 17, 2026 announcement.

**F.5, Post 5: *The Watershed Is Yours Now*.** What's still at stake, what readers can do during the consultation window, and the hand-off to the next generation.

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