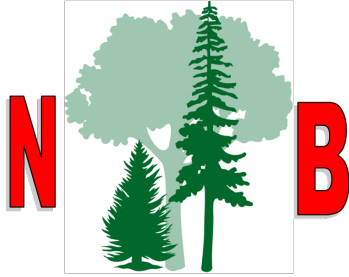


Propriétaires de lots boisés



Woodlot Owners

New Brunswick Federation Of Woodlot Owners

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July 27, 2023

Response to Statement of Public Interest Regulation under the Community Planning Act

The New Brunswick Federation of Woodlot Owners, the voice of private woodlot owners in New Brunswick, would like to offer the following comments on the proposed regulation Statement of Public Interest Regulation under the Community Planning Act.

The statement of public interest for natural resources is extremely vague and does not offer any assurance or direction to private woodlot owners. There is no way of determining if their woodlot will be identified as a natural resource development area or an environmentally sensitive area. There are no criteria identified for the designation of such areas and seems to be at the discretion of the entity making the determination. It is unclear how such discretion will foster a more consistent and predictable regulatory framework under the new regional service commissions.

We would recommend that more clarity be written into the statement of public interest or into other regulations, after consultation with the populations to be impacted. There are approximately 42,000 private woodlot owners who own approximately 71,000 individual PIDs. The private woodlot sector collectively owns slightly less than 1.8 million hectares of land and so there are significant impacts to any regulations imposed on them. Woodlot owners own forested lands for a variety of reasons and have a variety of objectives for that land. Individual owners' rights need to be respected.

A structure should be established that involves input/participation from affected communities. Perhaps establishing regional committees with reps from the different sectors. These committees should have the authority to establish the setbacks and changes to land status which could help reduce undue bias or influence by industrial and political entities.

There are also concerns about the impact of such a designation on the retail value of the property being so designated. What is the process for having the designation changed? Who has "say" in that change and if a property owner experiences a reduction in the value of their property as a result of this designation, what is the compensation mechanism?

Sincerely,

A handwritten signature in black ink that reads 'Susannah Banks'.

Susannah Banks
Executive Director