



May 28, 2018

Ms. Manon Carignan
 Direction des parcs nationaux
 Ministère des Forêts, de la Faune et des Parcs
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SUBJECT: KEAC Comments Regarding the Policy on Québec's National Parks

Ms. Carignan,

The Kativik Environmental Advisory Committee (KEAC) was created pursuant to Section 23 of the James Bay and Northern Québec Agreement (JBNQA) and is governed by the Environment Quality Act and the James Bay and Northern Québec Native Claims Settlement Act. The KEAC is a consultative body to responsible governments in matters relating to environmental and social protection in Nunavik. It is therefore the preferential and official forum for the Government of Canada, the Government of Québec, the Kativik Regional Government (KRG) and the northern village corporations. Accordingly, the KEAC monitors the national park creation and protected area identification processes in Nunavik and is submitting its comments regarding the 2018 government policy on Québec's national parks.

The KEAC understands the purpose of the policy will be to clarify the governance of national parks and reiterate the environmental, social and economic roles they play in Québec. The KRG, through Nunavik Parks, and in collaboration with the Ministère de développement durable, l'environnement et lutte contre les changements climatiques (sustainable development, environment and the fight against climate change, MDDELCC) and the Ministère des Forêts, de la Faune et des Parcs (forests, wildlife and parks, MFFP), is responsible for the management of parks and protected areas in Nunavik, for their protection and for educational purposes. The mission of Nunavik Parks is to protect and showcase the landscapes and attractions that so aptly represent the region's natural and cultural heritage. Parks are developed and operated sustainably, while both traditional and scientific knowledge guide conservation and education efforts.

Section 2.6 notes that the policy intends to "include the national parks in a regional biodiversity conservation dynamic". It is true that conservation and accessibility issues in national parks will have to be considered, however, it is equally important to protect and maintain the hunting, fishing and trapping rights of the region's Aboriginal peoples. The KEAC would like to better understand how this concept will be applied in Nunavik.

Section 3.1 outlines measures that will promote access to national parks. Nunavik is an isolated region with a high cost of living and travel that often deters not only tourists but also the local population from visiting national parks and protected areas in the region. Any growth in visitor numbers, no matter their point of origin, will inevitably have a positive

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impact of the region, allowing for more local economic development opportunities but also increasing overall cultural awareness. The KEAC would like to better understand how the policy intends to maintain affordable accessibility for the region's parks.

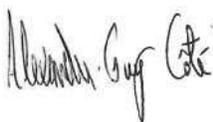
Additional elements of the policy relate to the contribution of Aboriginal communities to the network of national parks. It would not be an understatement to affirm that Nunavik possesses numerous natural environments with exceptional characteristics and landscapes that must be protected. In fact, specific areas have been identified and reserved by the Québec government for park or protected area purposes. Consultation of and collaboration with local communities and regional entities ensure that park and protected area projects improve protection for Inuit, Cree, and Naskapi harvesting and traditional activities as well as important cultural and archeological sites. Consequently, the KEAC believes it is important to maintain transparent governance, both from the provincial government and the KRG.

The KEAC would like to highlight a particular attention on park boundaries, specifically regarding potential mining activities near parks. Mineral exploration activities are not automatically subject to environmental assessment. Exploration companies are simply expected to follow a code of good practices and comply with Québec's environmental laws and policies (for example, buffer strips along the shores of lakes and water courses, the proper disposal of waste and used oil, the collection of wastewater). Notwithstanding, the presence of a park next to these mining claims should prompt mining company and park managers to practise extra care. For their part, mining exploitation is automatically subject to environmental assessment, pursuant to the Section 23 of the JBNQA and the Environment Quality Act (R.S.Q., c. Q-2). Such assessments would study the consequences of possible mining activities near the boundaries of parks and protected areas.

Despite the exceptional beauty and vastness of the territory, Nunavik is unfortunately sporadically littered with abandoned mineral exploration sites, dilapidated outfitting camps and various other contaminated sites. The KEAC understands the policy intends to implement site restoration projects and decontamination of natural environments and requests further information regarding these initiatives for the region.

To conclude, the KEAC supports updating the government policy on Québec's national parks with a particular focus on a long-term development, conservation and accessibility but also the desire to draw closer to the First Nations and Inuit. The KEAC welcomes the opportunity to express our concerns and wishes to remain informed regarding the progress to finalize the policy.

Respectfully yours,



Alexandre-Guy Côté
Chairperson, KEAC

cc. Jennifer Munick, Chairperson, KRG

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