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Comité consultatif de l'environnement Kativik
Kativik Environmental Advisory Committee

January 29, 2021

Élise Paquette
Acting Associate Deputy Minister for Wildlife and Parks
Québec Ministry of Forests, Wildlife, and Parks
5700, 4th Avenue West
Québec, QC
G1H 6R1

Subject: Comments on the future Québec *Wildlife Policy*

Dear Ms. Paquette,

The Kativik Environmental Advisory Committee (KEAC) was created pursuant to Section 23 of the *James Bay and Northern Québec Agreement (JBNQA)*. It is a consultative body to responsible governments in matters relating to environmental and social protection in Nunavik. To this effect, it is the preferential and official forum for the Government of Canada, the Government of Québec, the Kativik Regional Government (KRG), the northern villages and the Naskapi Nation of Kawawachikamach when required.

Moreover, the environmental and social protection regime of Section 23 of the JBNQA aims to reduce the adverse effects of development activities carried in the Region” on both the Inuit and Naskapi populations and the wildlife resources (23.2.2). Furthermore, the protection of the hunting, fishing and trapping rights of Nunavik’s indigenous population is ensured under Section 24 of the JBNQA and is considered under Section 23 where the environmental social protection regime is concerned. Given the broad scope of the future Québec *Wildlife Policy* and its implications for Section 23 of the JBNQA as well as Section 14 of the Northeastern Quebec Agreement (NEQA), the KEAC would like to bring its observations to your attention.

The KEAC welcomes the ambition of Quebec's first *Wildlife Policy* to protect against the depletion of biodiversity and to restore the majority of species in a precarious situation. In this regard, the KEAC hopes that the conservation and wildlife protection objectives set out in the proposed *Policy* will not be thwarted by those pursued in terms of exploitation. The decline of Nunavik’s caribou populations is an example of the importance of having strong protection measures in place, as it is both a species at risk and an important resource for the region’s indigenous inhabitants. The George

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River caribou herd has declined by more than 99% since 1993¹ and the Leaf River herd, by nearly 65% between 2000 and 2017². As such, the KEAC will monitor with interest the specific objectives and measures to be implemented in Nunavik to achieve this recovery target for species at risk. We encourage the MFFP to develop conservation tools and work in close collaboration with communities and regional entities.

The policy views wildlife as a driving force for socioeconomic development and wishes to facilitate hunting, fishing and trapping activities for enthusiasts as well as beginners and improving equitable access to the territory. For example, the policy targets to increase the portion of the Quebec population engaging in wildlife activities by at least 25% and objective 5.2 aims to "facilitate cohabitation in the territory". These formulations suggest an increase in the number of visitors to the region by hunting and fishing enthusiasts. In this regard, the KEAC wishes to recall that the JBNQA provides for a series of measures intended to secure the exercise of wildlife exploitation activities by the region's indigenous inhabitants. These subsistence rights are exclusive on reserved and selected lands (categories I and II), that is to say that non-Natives cannot practice hunting or fishing without authorization from the competent authorities (24.3.32). As for the right to trap, it is an exclusive right over the entire territory of Nunavik (categories I, II and III).

The JBNQA also introduces provisions applicable to the hunting and fishing regime of "non-Natives" (24.8). Category III lands are open to both Inuit, Naskapi, Cree and non-Natives. To avoid conflicts over the use of the territory's resources and to protect traditional subsistence activities, priority must be given to indigenous peoples. Thus, the JBNQA reserves for their exclusive use certain species of mammals, birds and fish (24.7.1) and grants them an exploitation priority by guaranteeing levels of exploitation equal to those, which existed at the time of the signature of the JBNQA.

The JBNQA also establishes co-management bodies to ensure the management of wildlife resources in Nunavik. In this regard, it is the Hunting, Fishing and Trapping Coordinating Committee that intervenes as a privileged body (24.4). Federal and provincial authorities must consult the latter before adopting measures that may infringe the rights of indigenous people over wildlife resources (24.4.23).

In addition, an increase in hunting and fishing by non-Natives in the region, may lead to a possible resurgence of outfitting camps. Although no new permits are currently being issued, Nunavik is still dealing with the legacy of abandoned and illegal outfitting camps as well as an overall lack of monitoring of outfitting activities in the region.

The KEAC understands that the consultation schedule on the future Québec Wildlife Policy has been affected by the COVID-19 pandemic, thereby limiting the participation of certain groups. We

¹ MFFP (2020). Nord-du-Québec – Inventaire du troupeau de caribous migrants de la rivière George. <https://mffp.gouv.qc.ca/nord-quebec-inventaire-caribous-migrants-2020-10-15/>

² MFFP (2018). Suivi démographique du troupeau de caribous migrants de la Rivière aux Feuilles. <https://mffp.gouv.qc.ca/caribous-migrants-riviere-aux-feuilles-2018-12-13/>

also recognize that the consultation document is very general, which makes it difficult to form an opinion and provide more in-depth feedback. The KEAC encourages the MFFP to continue its efforts and encourage the full participation of the Region's communities and organizations. The MFFP should also ensure that the Québec Wildlife Policy adequately responds to the specific context of Nunavik.

The KEAC wishes to be kept informed of the future development and implementation of the Québec Wildlife Policy.

Sincerely,



Paule Halley, Chairperson

CC:

Michèle Leduc-Lapierre, James Bay Advisory Committee on the Environment

Miles Smart, Hunting, Fishing and Trapping Coordination Committee

Noah Swappie, Naskapi Nation of Kawawachikamach

Adamie Delisle-Alaku, Makivik Corporation

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