



December 16, 2021

Consultation – Stratégie d'adaptation de la gestion et de l'aménagement des forêts aux changements climatiques  
Ministère des Forêts, de la Faune et des Parcs  
Office of the Associate Deputy Minister for Forests  
5700–4e Avenue Ouest, Suite A-405  
Quebec City QC G1H 6R1

SUBJECT: **Consultation on the draft *Climate Change Adaptation Strategy for Forest Management***

Dear Madam or Sir:

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. As such, it is the preferential and official forum for the Government of Canada, the Gouvernement du Québec, the Kativik Regional Government (KRG), and the northern villages. In addition, paragraph 23.5.34 of the JBNQA stipulates that the Ministère des Forêts, de la Faune et des Parcs (forests, wildlife and parks, MFFP) "shall, when preparing a management plan for Crown forests and forestry operations, forward such management plan to the [KEAC] for its consideration and comments before approving the said management plan."

The KEAC submitted a position paper to the Commission d'étude sur la gestion de la forêt publique québécoise (public forests management task force) in 2004 and a brief to the MFFP in 2011 regarding Québec-government consultations on sustainable forest management. The recommendations contained in the documents remain pertinent and are appended to this letter.

#### Forests in Nunavik

Nunavik is the region located north of the 55th parallel, covering 507,000 km<sup>2</sup>. Almost half of the region lies south of the tree line. Although no active forest industry is present in Nunavik, the effects of climate change and the expected development of mining infrastructure have increased the need for protection of the region's fragile woodland

ecosystems and their biodiversity. These woodland ecosystems are also important for Inuit, Naskapi and Cree subsistence practices.

The KEAC understands that, between 2005 and 2009, an eco-forest inventory was prepared by the scientific committee charged with examining the northern timber allocation limit. Initial results of this work established vulnerabilities associated with the physical environment, the regional reference climate for Nunavik between 1981 and 2010, as well as climate change scenarios up to 2100. The exercise also identified and listed "vulnerable areas" that represent risks to the region's residents. Given the potential for significantly higher average annual temperatures in northern Québec by 2100, disturbances to the ecological balance between habitats, wildlife species and vegetation are inevitable. New land and water ecosystem conditions will influence the abundance, distribution and productivity of wildlife species that make up the food supply of Inuit, Naskapi and Cree in the region.

The KEAC recognizes that the current MFFP consultation on the draft *Climate Change Adaptation Strategy for Forest Management* pertains to the management and development of forests in the domain of the State located south of the northern timber allocation limit. It has nonetheless also noted that the information on climate change impacts and natural disturbances, obtained in particular through monitoring initiatives such as the eco-forest inventory, include the area beyond this limit. As a result, the KEAC is of the opinion that the Strategy should include Nunavik and has taken advantage of this opportunity to provide feedback on the proposed Strategy.

### **Key Topic 1 – In-depth knowledge of the impacts of climate change**

The first key topic is highly relevant for Nunavik. The region's woodlands ensure ecological and social benefits for residents, namely cultural and subsistence-related activities. Climate change is already affecting these realities.

It is expected that climatic warming and resulting unstable weather patterns will impact on the health, abundance, migration and distribution ranges of several wildlife species that are crucial for Inuit, Naskapi and Cree subsistence harvesting. One well-documented example is the effects on caribou populations and their seasonal ranges. Boreal-forest species, such as moose, black bear and beaver, have also been observed edging northward from their typical ranges.

The KEAC understands that the MFFP is currently preparing a separate strategy for mountain and woodland caribou. There are two main woodland caribou herds in Nunavik: the Leaf River herd and the George River herd. Climate change-related vulnerabilities and risks for these populations and their habitats should be assessed in order to harmonize the management plans under both strategies.

The purpose of Objective 1.3 is to equip forest stakeholders and users with tools to address the impacts of climate change. Inuit, Naskapi and Cree are the main stakeholders and users in Nunavik. Consequently, training and workshops for government, industry and the scientific community on information sharing and adaptation strategy development should involve Indigenous communities and incorporate traditional knowledge.

Climate change is causing ecosystems to change, with those situated further north experiencing greater impacts. These include extended ranges for some wildlife species, insects and parasites, and changes in vegetation due to higher annual temperatures. Increased precipitation will produce longer growing seasons and push southern ecosystems, in particular forests, northward.

Given that the region's natural ecosystems are so fragile, the effects of climate change on woodlands and residents should be subject to close monitoring. The KRG is already involved in the study of climate change in Nunavik in cooperation with Québec and Canadian partners. It is also contributing to the development of several regional adaptation initiatives. The KEAC urges the MFFP to ensure communication with the KRG on such matters.

#### **Key Topic 2 – Stronger management of risk associated with natural disturbances**

Specific areas of interest (zones of cultural importance, exceptional timber stands, protected areas, etc.) –not to say all of Nunavik's woodlands– should receive the same level of forest-fire and insect-outbreak monitoring protection as is provided in forests in southern Québec. The KEAC therefore recommends that the Strategy cover risk assessment in Nunavik in order to mitigate the adverse effects of natural forest disturbances.

#### **Key Topic 3 – Maintenance of forest productive capacity and associated benefits**

The Strategy proposes to use the best available data to encourage actions that strengthen forest resilience and adaptive capacity, and to support forest-based economic activities and spinoffs. Although no forest industry currently exists in Nunavik, the KEAC recommends that the MFFP recognize the social and environmental importance of woodlands in the region.

The purpose of Objective 3.4 is to maintain adequate habitat conditions for sustainable wildlife management. To this end, the MFFP plans to continue tracking changes in the distribution ranges of wildlife species caused by climate change that show economic potential. In its letter dated January 29, 2021, regarding the MFFP wildlife policy, the KEAC explained that the JBNQA contains a series of measures to protect wildlife harvesting activities by the region's Indigenous residents. These subsistence rights are exclusive on selected and reserved Category I and II lands. Specifically, non-Indigenous users are not permitted to hunt or fish without proper authorization (paragraph 24.3.32). For their part, Indigenous trapping rights apply on all land categories. In this context, the MFFP's wildlife policy and its *Climate Change Adaptation Strategy for Forest Management* should both take into account and ensure harmonized practices.

#### **Key Topic 4 – Ongoing access to forests**

In addition to the need for enhanced knowledge of the effects of climate change and natural disturbances, the KEAC would like to point out that this fourth key topic focuses on road construction and use. These activities are covered under the *Sustainable Forest Development Act*, which “applies to the forests in the domain of the State and forests belonging to private owners or held under a title of ownership by a Native landholding corporation to which the Act

*respecting the Land Regime in the James Bay and New Québec Territories* (chapter R-13.1) applies, to the extent provided for in this Act". Nunavik is not connected to Québec's road network and its communities are mainly accessible by air. Notwithstanding, mineral exploration and mining are the main type of industrial development in the region and often require the construction of access roads that impact on the natural environment, in particular woodland ecosystems and wetlands. The KEAC recommends that this regional context be taken into consideration during road-network vulnerability assessments and the updating of road practices and standards due to climate change.

### **Monitoring and reporting**

According to the MFFP, implementation of the Strategy will be monitored to ensure that short-term objectives are achieved. However, in a region as large as Nunavik, adequate government monitoring practices are not carried out regularly or consistently. The KEAC therefore recommends that the MFFP regional branch assign staff exclusively for Nunavik and that it work in cooperation with the KRG, which has a mandate to monitor activities in the region outside of the 14 northern villages.

### **Conclusion**

Pursuant to its mandate, the KEAC intends to remain actively involved in matters related to the management and use of woodlands in Nunavik. It furthermore expects to be kept informed of developments regarding this specific file.

Sincerely,  
[signature]

Tunu Napartuk  
Chairperson  
Kativik Environmental Advisory Committee

## **Appendix**

Recommendations extracted from the position paper prepared by the KEAC and submitted to the Commission d'étude sur la gestion de la forêt publique québécoise (public forests management task force) in October 2004.

1- The KEAC recommends to the Commission that a fact-finding group be established to compile and round out current knowledge of forest resources in Nunavik. This group would analyze and consolidate the studies (effectiveness of reforestation, soil quality, post-fire harvesting, etc.) necessary to ensure the protection and conservation of Nunavik's wood resources.

2- Prior to the implementation of the preceding recommendation, with the exception of personal use, the KEAC recommends to the Commission the suspension of all activities (logging, wood harvesting, etc.) that could contribute to the decline of forest resources in Nunavik. This recommendation should apply until such time that the impacts of these activities are understood and that a management plan has been established to foster complete rehabilitation, within a reasonable period of time, of the situation that existed before the decline of the forest resource and connected ecosystems.

3- The forest management plan must comply, north of the 55th parallel, with the principle of conservation, the Inuit right to harvest wildlife set out in Section 24 of the JBNQA, as well as the environmental protection provisions set out in Section 23 of the JBNQA.