



April 25, 2022

Christine Gélinas  
Director  
Species and Natural Environment Protection Branch  
Ministry of the Environment and the fight against Climate Change (MELCC)  
675 René-Lévesque Boulevard East, 4<sup>th</sup> floor box 21  
Quebec, QC  
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**SUBJECT: Consultation on the amendment to the Regulation respecting threatened or vulnerable plant species and their habitats**

Dear Ms. Gélinas,

On behalf of the members of the Kativik Environmental Advisory Committee (KEAC), I would like to thank you and your colleagues for consulting us regarding the proposed amendments to the Regulation respecting threatened or vulnerable plant species and their habitats (RSEP). Although most of the proposed amendments do not concern species or habitats present in the KEAC's territory of interest, we note with interest the change in status of the Puvirnituaq Mountain Draba (*Draba puvirnituaqii*), whose known population is found between the communities of Salluit and Kangiqsujaq. Considering the rarity of this floristic species and its habitat and the precariousness of its environment, the KEAC welcomes this new designation. We believe that the designation as a threatened species of the Puvirnituaq Mountain Draba will allow a recognition of its fragility and a better protection of the exceptional habitats that shelter it.

In 2019, the Committee on the Status of Endangered Wildlife in Canada (COSEWIC) published a report on the status of the Puvirnituaq Mountain Draba. It concluded that the overall threat impact was assigned as low because only climate change presents a plausible threat to this rare species in the long term. Puvirnituaq Mountain Draba consists of a single localized occurrence along the upper Deception River where individuals grow sporadically in two closely spaced sites. The rarity of this plant species is due to the fact that it occurs on an extremely rare substrate (oxidized peridotite rubble). The area in which it is found is only accessible by helicopter. However, there is a road located 11 km to the southwest linking the Raglan mine (Kattiniq) to the ore transshipment site at Déception Bay. Therefore, should mining activities, whether exploration or exploitation be extended within the reaches of the 13 km<sup>2</sup> range of the plant, the impact on its fragile and unique habitat could result in its extinction. As such, its protection from industrial activities is important.

Furthermore, the community of Kangiqsujaq is located 95 km to the southeast of the area where the only population of Puvirnituaq Mountain Draba is found. Although it is isolated, this area may be used by the Inuit for subsistence practices. As such, it would be pertinent that any protection measures should involve communication with community residents on the importance of protecting this rare plant species.

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The KEAC is also aware that Nunavik Parks supports the proposal to protect the Puvirnitug Mountain Draba. With its mandate to create and manage parks and protected areas in the Nunavik region, the KEAC suggests that the MELCC collaborate with consult the expertise of Nunavik Parks and by extension the Kativik Regional Government to develop a better understanding of this plant species and measures to ensure its protection.

Sincerely yours,

A handwritten signature in black ink that reads "Alexandre-Guy Côté". The signature is written in a cursive style with a large initial 'A' and 'G'.

Alexandre-Guy Côté  
President- KEAC