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Comité consultatif de l'environnement Kativik
Kativik Environmental Advisory Committee

April 12, 2024

Marisol Moore
Acting General Director
Direction générale de la coordination et de la valorisation de la nature
Ministère de l'Environnement, de la Lutte contre les changements climatiques,
de la Faune et des Parcs
880, chemin Sainte-Foy
RC 120
Québec, QC
G1S 4X4

Subject: Response to the Indigenous Consultation on the Wildlife Conservation and Development Act

Dear Ms. Moore,

The Kativik Environmental Advisory Committee (KEAC) is the official forum of the governments responsible for Nunavik for the development of laws, regulations and policies concerning environmental and social protection in the territory governed by the James Bay and Northern Quebec Agreement (JBNQA) and located north of the 55th parallel.

On February 12, 2024, the KEAC received an e-mail invitation to participate in the Indigenous consultation on the Act respecting the conservation and development of wildlife (ARCDW). On March 19, 2024, the committee was informed that the proposed amendments to the ARCDW would be incorporated into a legislative omnibus concerning the Environment Quality Act (EQA), the Natural Heritage Conservation Act (NHCA) and the Threatened or Vulnerable Species Act (TVSA). The KEAC had already sent comments on the proposed amendments to the ARCDW, LCPN and LEMV in December 2023. New proposed amendments to the NHCA and TVSA were sent to us in the March 19 mailing. Below are comments on the main issues raised by the proposed amendments to the ARCDW, as well as by the new proposed amendments to the LEMV.

Regarding the amendments to the ARCDW, the KEAC considers it particularly important to add the ecosystem approach to the analysis of activities modifying wildlife habitat, as provided for in the proposed amendment to section 128.6. The KEAC suggests broadening this desired ecosystem approach by giving the Minister the power to refuse projects in wildlife habitats, even if they meet the exemptions set out in section 128.6. The ecosystem approach should thus make it possible to determine that certain activities,

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despite their compliance with the standards or operating conditions determined by regulation, may cause modifications to the elements required to meet the needs of the species targeted by these habitats.

In the proposed amendments to the LEMV, the MELCCFP proposes amending section 16 to "confer authorization power on the Minister for activities other than for educational, scientific or management purposes, and thus cover all possible situations". The KEAC is not in favor of this amendment, since exemptions to the prohibition in section 16 are already numerous, and extending authorization to additional activities that affect threatened or vulnerable species does not appear to be consistent with the objectives of protecting and recovering these species. The KEAC therefore recommends against expanding the Minister's powers to authorize activities affecting threatened or vulnerable plant species or their habitats.

Best regards,

A handwritten signature in blue ink that reads "André-Anne Gagnon". The signature is written in a cursive style with a light blue background behind it.

Chairperson, KEAC