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Comité consultatif de l'environnement Kativik
Kativik Environmental Advisory Committee

June 18, 2024

Jacob Martin-Malus
Assistant Deputy Minister to Biodiversity, Wildlife and Parks
Ministère de l'Environnement, de la
Lutte contre les changements climatiques, de la Faune et des Parcs
Marie-Guyart Building, 4th floor, Box 21
675, René-Lévesque Boulevard East
Québec City, QC
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Subject: Response to the draft 2024-2027 action plan for the Plan Nature

Dear Mr. Martin-Malus,

You will find below the Kativik Environmental Advisory Committee (KEAC) comments on the 4th phase of consultation on the draft Nature Plan, focusing in particular on the 2024-2027 action plan.

Monitoring indicators

The KEAC notes that the targets currently proposed in the action plan are generally aimed at indicators that apply to the entire province of Quebec. For example, for the restoration of 30% of priority degraded ecosystems, the planned follow-up indicator is the “fraction of priority degraded ecosystems for which restoration has been initiated”. The KEAC considers that, to ensure a fair distribution of projects throughout Quebec, it would be advisable to include more localized targets. Considering the logistical challenges, meteorological particularities and geographical remoteness of Nunavik, projects in this territory are much more expensive and complex to implement. Without regional targets, projects in northern environments could be disadvantaged by province-wide targets, since the allocation of funding could favour projects that are less costly to achieve the monitoring indicators.

Northern conservation territories

To meet Target 3, and Objectives 3.1, 3.2 and 3.3, the action plan calls for “Completing the development of legal and regulatory tools for the protection and conservation of natural environments for other effective conservation measures, marine reserves, sustainable use of protected areas, indigenous-initiated protected areas, humanized landscapes and any other complementary conservation measures in continental environments”. As part of the Plan Nord, the Quebec government committed to protecting 50% of the territory north of the 49th parallel by 2035. As of December 31, 2023, 19.19% of the Plan Nord’s territory has been

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officially integrated in Quebec's network of protected areas. This commitment was to be achieved through several land protection tools, particularly the northern conservation territories. It therefore seems appropriate to include northern conservation areas in the development of the legal and regulatory tools provided for in Plan Nature's action plan.

In addition, to limit confusion and ensure greater coherence in the various projects, it would be desirable for all approaches to biodiversity conservation and protected areas to be coordinated with each other.

Connectivity and jurisdiction

Target 3 of the Nature Plan calls for the conservation of 30% of continental environments and 30% of marine environments in Québec. Nunavik's currently recognized territorial boundaries create challenges for protected areas near the coast. Overlapping jurisdictions in the coastal zone, where water boundaries influence the protection responsibilities of Quebec, Nunavut or the Government of Canada, means that protecting intertidal zones is complex. Yet these areas are critical to the protection of biodiversity and are necessary for many traditional activities protected by the James Bay and Northern Quebec Agreement. The KEAC believes that agreements with other jurisdictions are desirable to facilitate the protection of coastal zones, and that the negotiation of such agreements should be added to the action under Target 3.

Consultation context

The KEAC acknowledges the proactive communications of the Nature Plan team and would like to highlight the improvements that have been observed between the different versions of the plan that were presented to us. However, while the main targets of the Nature Plan are laudable, it is the real actions taken and the indicators respected that will measure the success of the action plan and, more broadly, if the Nature Plan is achieving the objectives targeted by the Kunming-Montreal Framework. However, we are currently being asked to comment on the action plan based only on extracts and examples of potential actions and indicators, without having access to either the action plan or the Plan Nature in their entirety. Under these conditions, it is hard for us to determine whether the proposed action plan will effectively address the biodiversity conservation issues specific to Nunavik, nor to suggest improvements to the indicators or targets to better adapt them to these realities. The committee therefore recommends that future consultations allow for comments on complete documents, as partial documents are not enough to provide a meaningful analysis.

Best regards,



André-Anne Gagnon
Chairperson, KEAC