



November 22, 2011

The Honourable Pierre Arcand  
Minister of Sustainable Development,  
Environment and Parks  
Édifice Marie-Guyart, 30<sup>e</sup> étage  
675, boulevard René-Lévesque Est  
Québec (Québec) G1R 5V7

**Re: Comments on the draft Climate Change Action Plan  
2013-2020**

Dear Minister:

Climate change is a major environmental and social issue in the James Bay territory. In 2007, the James Bay Advisory Committee on the Environment (JBACE) prepared a portrait of the impacts on the territory in light of research findings.<sup>1</sup> More recently, the Committee joined with partners in the territory to review the impacts and consider adaptation strategies, especially in the case of travel for hunting, fishing and trapping purposes.<sup>2</sup>

In this context, the JBACE welcomes the opportunity to comment on the draft Climate Change Action Plan (CCAP) 2013-2020. Of course, the JBACE recommends that you give effect to the CCAP 2006-2012 by adopting a new action plan, especially as northern regions are affected by global warming to a disproportionate degree.

***Emission-reduction programs***

The JBACE believes the James Bay Cree communities should have the opportunity to participate fully in efforts to reduce greenhouse gas (GHG) emissions. To do so, the JBACE supports measures to make the communities eligible for awareness, inventory and management programs, such as *Climat Municipalités* and *Action Climat*.

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<sup>1</sup> See the report "Portrait and environmental impacts of climate change on the James Bay territory," 2007:

<http://www.ccebj-jbace.ca/english/publications/climate.html>

<sup>2</sup> See the final report of the project: [http://www.creegeoportal.ca/geoportal/index\\_climate\\_change.php](http://www.creegeoportal.ca/geoportal/index_climate_change.php)

***Transportation, development and building***

As a result of the low population density (fewer than 35,000 people in an area covering 20% of Québec), the James Bay region creates far less GHG emissions than urban areas do. Even so, transportation of people and goods involves great distances. This issue will become more important as development takes place under the Northern Plan ('Plan Nord'). That is why the JBACE supports the regulatory measures proposed to reduce the transportation sector's emissions, particularly those of heavy trucks.

The JBACE also supports the proposal to upgrade the authorizations and permits regime in order to reflect the impacts of climate change.

Moreover, the Committee endorses the proposal to establish more stringent building standards for northern regions in order to take into account the more rigorous climate. This measure must be accompanied, however, by a grant program for building upgrades so as not to increase unduly the already high cost of living in Northern Québec.

***Forests***

The boreal forest is central to the Crees' traditional way of life because of the wildlife habitats it contains. Maintaining the Crees' hunting, fishing and trapping rights, which are expressly recognized in the James Bay and Northern Québec Agreement (JBNQA), depends to a great extent on conservation of boreal forest ecosystems. In this respect, the JBACE supports the creation of protected areas, especially with sites that are culturally significant for the Crees. The Committee also insists on the importance of protected areas to preserve threatened or vulnerable species such as woodland caribou.

In the managed (or commercial) boreal forest, the JBACE is in favour of measures to harmonize forest management with the Crees' wildlife harvesting, including those provided in the adapted forest regime under the Agreement Concerning a New Relationship between Québec and the Crees (ANRQC). For several years, the JBACE has been trying to ensure that environmental and social protection criteria are included in the Instructions for Preparing General Forest Management Plans.

In this context, the JBACE naturally supports the proposed "zero deforestation" target, which would offset the loss of forest resulting from human activity with the planting of an equivalent area.

***Management of residual materials***

The JBACE has been working with your Department for several years to ensure the James Bay communities have access to recovery and recycling

programs. In commenting on the new Residual Materials Management Policy, the Committee emphasized constraints on the application of certain measures in the James Bay territory. For example, the prohibition on disposal of organic waste in landfills would significantly reduce the quantities sent to landfill sites as well as GHG emissions. Composting in northern areas presents special challenges, however.

The JBACE recommends that application of the Policy to the James Bay territory be accompanied by training measures as well as financial and logistical support. The Committee intends to continue working on this matter with your Department's residual materials unit.

***Mandate***

We would like to reiterate that the JBACE has a mandate to study and oversee administration of the environmental and social protection regime under Section 22 of the JBNQA. One of the guiding principles of the regime is to reduce the undesirable impacts of development on Native people, the environment and wildlife habitats. Climate change constitutes an overall impact of development, and you can therefore count on the JBACE's support in impact reduction initiatives and adaptation strategies.

Yours truly,



Ashley Iserhoff  
Chairman

c.c. Messrs. Matthew Coon Come, Grand Chief, Grand Council of the Crees  
(Eeyou Istchee) and Chairman of the Cree Regional Authority  
Jacques Dupont, Assistant Deputy Minister, Water Resources  
Expertise, Analysis and Environmental Assessment, MDDEP  
Ms. Geneviève Moisan, Director, Climate Change Bureau, MDDEP