



Comité consultatif pour l'environnement de la Baie James  
James Bay Advisory Committee on the Environment  
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## **JBACE commentary:**

# Social Acceptability of Natural Resource Development Projects in the James Bay Territory

In response to the *Green Paper – Guidelines of the Ministère de l'Énergie et des  
Ressources Naturelles in the area of Social Acceptability*

**Presented to the Committee on Agriculture, Fisheries, Energy and  
Natural Resources of the *Assemblée nationale***

April 2016

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## **Introduction**

With the signing of the James Bay and Northern Quebec Agreement (JBNQA) in 1975, the signatory parties established a unique environmental and social protection regime as outlined in Section 22. This regime is explicitly designed, among other things, to ensure the involvement of the Cree in all facets of its application, and to minimize the impacts of development on the Cree and on the James Bay Territory's wildlife and ecology.

The JBNQA established the James Bay Advisory Committee on the Environment (JBACE) to oversee the administration and management of the environmental and social protection regime for the James Bay Territory in accordance with Section 22. This section names the JBACE as the preferential and official advisory forum for governments regarding the formulation of laws, regulations and policies that may affect the environmental and social protection regime, or that may have an influence in the Section 22 environmental assessment and review procedure.<sup>1</sup> The JBACE exercises this mandate as a tri-partite committee composed of members appointed by the Cree, provincial and federal governments in equal measure.

Many of the proposals in the document entitled '*Green Paper – Guidelines of the Ministère de l'Énergie et des Ressources Naturelles in the area of Social Acceptability*' (hereafter, Green Paper) will undoubtedly influence the planning and handling of development projects in the James Bay Territory.

This brief was thus prepared for the Committee on Agriculture, Fisheries, Energy and Natural Resources (CAFENR) to outline our concerns and recommendations in their regard.

### ***JBACE presentation to the CAFENR on March 16<sup>th</sup> 2016***

A delegation of the JBACE presented a very preliminary overview of its three primary concerns regarding the Green Paper during a consultation held by the CAFENR, at the National Assembly of Québec, on March 16<sup>th</sup> 2016.

Given the very restricted amount of time afforded to the JBACE to prepare, the presentation made to the CAFENR could not outline these concerns, or any related recommendations on the matter, in detail.

Rather, and as affirmed by the JBACE delegation on that occasion, the presentation would be followed by the tabling of a formal written brief – the present document.

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<sup>1</sup> See paragraph 22.3.24 of the JBNQA relating the JBACE's mandate.

***JBACE Concern n° 1 The unique concept of social acceptability in the James Bay Territory covered by Section 22 of the JBNQA***

Natural resource development is not new to the inhabitants of the territory subject to the JBNQA. The development of the region's natural resources makes appreciable contributions to the province's economy and also constitutes one of the primary economic drivers for the region's inhabitants. The Green Paper does not address this northern reality.

Focusing only on mineral exploration in 2014 for example, expenditures thereon in the Nord-du-Québec Administrative Region accounted for 53 % of the provincial total and the number of claims in the administrative region accounted for 61.6 % of all claims in Québec.

Given their long-standing experience with natural resource development projects, the concept of 'social acceptability' is also not at all new to the citizens and communities of the region. Indeed, its foundations as a concept stretch at least as far back as the signing of the JBNQA.

The environmental and social protection regime set out in Section 22 of the JBNQA, is subject to a unique set of nine guiding principles.<sup>2</sup> Coupled with these principles is a special status of involvement of the Cree in the application of the regime – a status that ensures Cree representation and consultation in all facets of the regime that is over and above that provided for in procedures involving the general public.<sup>3</sup> These principles, and the special status of involvement of the Cree, were decidedly innovative at the time of their adoption in 1975, establishing a foundation for the protection of Cree society and of the environment, in light of development and the impacts of that development on the Cree people. These elements of the Section 22 regime are as apt today as they were then. Important links can be made with them, the principles outlined in the *Sustainable Development Act*, and the proposed orientations in the Green Paper.

The Section 22 regime is also explicitly designed and obligated to protect the provisions set out in Section 24 which defines the hunting, fishing and trapping regime in the Territory. As a core component of the JBNQA, this hunting, fishing, and trapping regime must be given all the necessary consideration and protection when addressing issues related to development in or affecting the Territory.<sup>4</sup>

In light of its guiding principles, the special status of involvement of the Cree in the application of the regime, and the obligation to account for the provisions of Section 24, the Section 22 regime specifically requires the consideration of the impact on the Cree way of life when examining a development project or when considering government action which may affect the environment or Cree communities in the Territory.

As such, the joint entities created in virtue of Section 22<sup>5</sup> and the Territory's administrations and planning bodies, have already developed avenues for voicing and evaluating the social acceptability of natural resource projects. These have become critical institutions through which the Cree can collect information, pose questions and provide information on them. They have thus established a tested framework for ensuring that projects occur in a manner that is acceptable to the Cree people and to the Cree communities. This framework is specific to the Territory.<sup>6</sup>

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<sup>2</sup> See paragraph 22.2.4 of the JBNQA for the guiding principles of Section 22.

<sup>3</sup> See paragraph 22.2.2c of the JBNQA for the special status of involvement of the Cree.

<sup>4</sup> See paragraph 22.2.2d of the JBNQA for this obligation.

<sup>5</sup> The JBACE, the Evaluating Committee, the Provincial Review Committee and the Federal Review Panel-South.

<sup>6</sup> Indeed, nowhere else in Québec, save for the Nunavik territory, exists a context as evolved for the integration, appreciation and evaluation of a First Nations' interests and values in the examination of natural resource projects.

The Green Paper makes no mention of this unique means of addressing social acceptability in the James Bay Territory, or of the established institutions that have made this possible. Future material on the matter must give explicit reference to this northern reality, to the principles and entities created under Section 22 of the JBNQA, and to the continued implication of the Territory's local and regional administrations and planning bodies. It is imperative that the MERN recognize and respect the important and continued contributions of these institutions in addressing the social acceptability of development projects in the Territory.

*Recommendation*

The MERN should recognize the existing framework for evaluating the social acceptability of resource development projects in the James Bay Territory. This framework is built on the various entities created in virtue of Section 22 of the JBNQA and on the region's administrations and planning bodies. This framework represents a tested means for ensuring that projects occur in a manner that is acceptable to the inhabitants and communities of the Territory.

***JBACE Concern n° 2 Roles and responsibilities, the land use planning process, strategic environmental assessment, and predictable information and consultation processes***

a) Need to clarify roles and responsibilities

We support the objective to increase understanding of the MERN's role. Other ministries, agencies, and committees involved in land use planning and management should follow suit.

It will be very important to clearly outline how a ministry like the MERN will go about planning and regulating development while, at the same time, supporting that development. These apparently conflicting responsibilities have been raised over the years and have led to a perception that the ministry is, on one hand, a third-party regulator while, on another, a supporter of development projects. In principle, the MERN must ensure that this apparent conflict does not jeopardize a credible and neutral information and consultation process upon which the social acceptability of projects will be based.

On another note, we also agree that the signing of impact benefits agreements should be encouraged. Cree communities have indeed developed appreciable experience in negotiating these agreements with project proponents. But, we see these agreements as a form of 'social contract,' solemnly negotiated between these two parties. And so although the MERN may be privy to them once negotiated, the ministry has no role to play in their negotiation.

*Recommendation*

The MERN should outline how it will go about planning and regulating development while, at the same time, supporting that development in a manner that does not jeopardize a credible and neutral information and consultation process upon which the social acceptability of projects will be based.

b) Need to update the land use planning process

We support the MERN's intention to include occasions for public consultation during the drafting of land use plans. But, the text relating to this proposal is unclear and does not elaborate sufficiently thereon when read in the context of the new governance regime in the James Bay Territory:<sup>7</sup>

Per the new governance regime, both the Cree Nation Government and the Eeyou Istchee James Bay Regional Government – itself composed of Cree and Jamesian representatives in equal measure – will develop resource and land use plans. Both of these exercises will be fora where the Cree and Eeyou Istchee James Bay Regional Government (EIJBRG) leadership will address the concerns and interests of their citizens.

The consultation of Cree and Jamesian communities in the preparation of the Territory's land use plans are thus already assured and the bodies responsible for this planning have already been identified.

We believe that the Cree Nation Government and the EIJBRG are the best-placed institutions for the planning of the lands under their purview (notwithstanding the MERN's responsibility for the preparation of the Public Land Use Plan – or, 'PATP' in French).

*Recommendation*

The MERN must account for the already-existing institutions and procedures regarding the development of land use planning in the James Bay Territory. These local and regional institutions must be assured a central role in the land use planning process.

c) Contribution of strategic environmental assessment

On another but equally important note, page 16 of the text mentions that "*Through strategic environmental assessments (SEAs), the MERN examines and describes the issues, impacts and benefits of emerging sectors, for example in the fossil fuel field.*" It also cites the MERN's role in developing PATPs, and the ministry's role in setting out development guidelines for the public lands included therein.

The Green Paper does not elaborate any further on SEAs. As it stands, the text implies that the MERN will be solely responsible for the SEA of sectoral plans, programs and policies (PPPs). It also does not recognize the gains that may be made in terms of social acceptability by subjecting land use planning initiatives to SEA.

We feel that SEAs are indeed ideal tools for examining and outlining strategic issues concerning sectoral plans, programs and policies (PPPs) such as the province's Energy Policy. We believe, however, that SEAs can prove equally useful when applied to land use planning exercises. This is so because, by definition, SEAs include opportunities for the collection of public, local, and regional stakeholder interests and expectations regarding development, upstream from specific projects.<sup>8</sup> Development alternatives, orientations and potentials can thus be assessed, described, and selected in the context of PPPs and land use planning exercises via SEAs. These development alternatives, orientations and potentials thus reflect the environmental, social, and economic expectations that must frame downstream projects – whether the SEAs were conducted in the context of PPPs or land use planning initiatives. SEAs thus serve as a platform to integrate the concerns of the

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<sup>7</sup> For details, see the [Agreement on Governance in the Eeyou Istchee James Bay Territory between the Crees of Eeyou Istchee and the Gouvernement du Québec](#) which was signed in July 2012.

<sup>8</sup> Of course, these interests and expectations focus on the environmental, social, and economic aspects of development.

public and local and regional stakeholders in the elaboration of the PPPs and land use plans that will eventually set the stage for projects on the ground.

For these reasons, the possibility of subjecting land use planning initiatives to SEAs – specifically the PATPs – should be considered by the MERN.

Having said this, we feel that any ministry required to undertake an SEA cannot successfully do so on its own in the James Bay Territory. We thus do not concur with the notion that the MERN should be solely responsible for the conduction of SEAs on PPPs, or on land use planning initiatives, for that matter. We are also of the opinion that no specific ministry is well-placed to oversee the consultations that must occur in the context of SEAs on PPPs and land use planning initiatives in the Territory. Instead, we feel that a collaborative approach, where the Territory's inhabitants and existing institutions take center-stage and champion the co-designation of development alternatives, is the best course of action.

We believe that in order to add credibility to SEAs, an independent and inter-ministerial body should be setup to supervise, to oversee, and to guide the various ministries that will be tasked to undertake SEAs on their respective PPPs and land use planning exercises. We also recommend the establishment of a consultative authority, specific for the lands subject to the JBNQA, to coordinate and oversee the consultations that must occur for SEAs when dealing with PPPs or land use planning initiatives that may have an influence on the Territory and its Cree and Jamesian inhabitants. Here, the inter-ministerial oversight body for SEAs and the consultative authority for SEAs can ensure that the guiding principles of the JBNQA and the special status of involvement of the Cree are respected, and that the Territory's local and regional governments and stakeholders are included.

All the while, the Ministère du Développement durable, de l'Environnement et de la Lutte contre les changements climatiques (MDDELCC) intends to revise the authorization regime for development projects currently prescribed in the *Environment Quality Act* (CQLR c. Q-2). The Livre Vert, published on the matter in June 2015, confirms the MDDELCC's intention to establish a framework for the conduct of SEAs. The MERN must remain mindful that the requirements relating to SEA as a whole are still being hashed out.

Finally, we have already expressed our opinion that the MERN's Green Paper and the MDDELCC's revision exercise propose common or linked elements and concepts, and that both ministries must make efforts to ensure coherence between these initiatives.

### *Recommendations*

SEAs should be employed in the context of policies, plans and programs, as well as in the context of land use planning exercises such as the development of PATPs.

An independent and inter-ministerial body should be setup to supervise, to oversee, and to guide the various ministries that will be tasked to undertake SEAs on their respective PPPs and land use planning exercises.

A consultative authority, specific for the lands subject to the JBNQA, should be setup to coordinate and oversee the consultations that must occur for SEAs when dealing with PPPs or land use planning initiatives that may have an influence on the Territory and its Cree and Jamesian inhabitants.

d) Need to establish predictable information and consultation processes

The JBACE has repeatedly stressed that the inhabitants of the Territory must benefit from a maximum of freely-available information, and opportunities to voice their concerns, relating to projects (small or large). We have espoused the benefits of implementing predictable information and consultation processes for many years; both for projects that are subjected to formal Section 22 environmental assessments and reviews and for those that are not.<sup>9</sup> Indeed, the JBACE and the Section 22 assessment and reviews bodies have also consistently encouraged proponents to self-engage with the Territory's communities as early as possible, well in advance of formal assessments or reviews. We thus welcome this MERN proposal.

We recognize that this proposal will not affect the information and consultation procedures that apply for projects subject to Section 22 assessments and reviews. But we suggest, in line with our comments made in the first section of this brief, that this should be more clearly stated in future material on the matter.

For projects that are not subject to assessments and reviews, we encourage the MERN to clarify exactly what processes should be applied by proponents as a matter of best practice in the lands subject to the JBNQA. These processes should account for the principles and entities created under Section 22 of the JBNQA, as well as the continued implication of the Territory's local and regional administrations and planning bodies. They should also address the special status of involvement of the Cree as set out in the JBNQA, and outline what specific measures should be taken to that effect. The existing obligations regarding the exchange of project-related information as outlined in the governance regime applicable to the James Bay Territory, and per the revised *Mining Act* (CQLR c. M-13.1), must also be accounted for.

In addition to the present MERN initiative, we note that both the MERN and the MDDELCC have other concurrent ones that are working in the same vein. Namely, the MERN's draft *Aboriginal Communities Consultation Policy Specific to the Mining Sector*,<sup>10</sup> and the afore-mentioned MDDELCC initiative to revise the authorization regime set out in the *Environment Quality Act* (the latter will also include provisions relating access to information and consultation between proponents and the public).

Given that there are thus three concurrent initiatives working on the same issues but championed by two separate ministries, coherence will be crucial for project proponents, the public, and the other organizations involved. Three separate processes must be avoided.

Similarly, and as is also mentioned in the next section of this brief, great care must be exercised to ensure that the information and consultation procedures – and any entity that will be tasked with such functions – do not duplicate the work of already-existing organizations. For the James Bay Territory, the MERN should consider building on the work that is already being done in relation to these matters by the existing institutions in the Territory.<sup>11</sup> The MERN should seek to further empower these institutions given that they already provide tested linkages between project proponents and the Territory's local and regional stakeholders and citizens.

### *Recommendations*

The MERN should address the special status of involvement of the Cree in matters relating to information-exchange and consultation by the proponent.

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<sup>9</sup> See the JBACE website ([www.ccebj-jbace.ca](http://www.ccebj-jbace.ca)) for additional information regarding the JBACE's previous interventions on matters relating to public access to information in the Territory.

<sup>10</sup> The JBACE intends to provide specific comments on this draft policy in the near future.

<sup>11</sup> Namely, the entities created in virtue of Section 22 and the region's administrations and planning bodies.

The MERN should ensure coherence with other current initiatives relating to the exchange of information and consultation in the context of development projects, and with the existent procedures relating to these matters in light of the governance regime in the Territory and the revised *Mining Act*.

The MERN should consider building on the work that is already being done in relation to information and consultation matters by the existing institutions in the Territory. These institutions already play a role in facilitating and coordinating such exchanges between project proponents and the Territory's local and regional stakeholders and citizens.

### **JBACE Concern nº 3    Capacities to analyze project impacts and to monitor and follow-up**

#### a) Need to strengthen capacities to analyze project impacts

The sharing of a project's benefits pre-supposes that there is a clear understanding of that project's real impacts and tangible benefits. The Green Paper states that the MERN did not review the social benefits of any projects under its purview other than the social repercussions of recreational, tourism, and wind farm activities during land use planning exercises.

As the ministry responsible for the sustainable use of the province's natural resources, the MERN must account for the social impacts and benefits of the development of these resources. This is especially so, given that this is one of the primary exercises relating to the evaluation of the social acceptability of such projects. If it does not already have adequate tools to do so at its disposal, the MERN must quickly develop them.

On this note, we must advise the MERN that an assessment of the potential social impacts of a development project is not akin to an evaluation of that project's social acceptability. However, the assessment of a project's social impacts may indeed assist in the evaluation of its social acceptability. As such, given the north's history and importance as a resource region, it is suggested that the afore-mentioned tools (e.g. list of model projects) include detailed information on the perceptions of northern communities in light of development, and on northern legal and governance contexts. These tools should reflect the realities experienced by communities that live with development projects.

Social, environmental and economic impacts and benefits should not be treated separately for a given a project. They must be rigorously considered collectively, and 'weighted' on an equal footing, in light of the unique specificities of the projects and of their receiving environments and receiving communities.

For example, the review of the Matoush project by COMEX underscored that the environmental risks and the social 'costs' of the project were decisive factors, over and above the project's financial benefits, when these three aspects were evaluated together. Indeed, COMEX explained that the project could only proceed on condition that the proponent "...obtain the Crees' consent, through the Mistissini Band Council, with regard to the project's social acceptability, and must enter into a written agreement to that effect with the Band Council or another body designated by the Band Council."<sup>12</sup>

A single project portal can facilitate administrative procedures. But, if a real commitment is made to operate under the principles of sustainable development, the creation of distinct project analyses bodies, working in 'silos,' must be avoided. And so, although not condoned by the JBACE, an independent financial institution to assess project financials and a separate major project office to coordinate projects will have to closely

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<sup>12</sup> COMEX, July 2011. *Environmental Review Report for the Matoush Uranium Exploration Project*. See page 31.

coordinate and communicate with each other. These entities will also have to align their work with other organizations on the James Bay Territory as well as local and regional governments.

For example, the financial institution and the major project office will have to coordinate their activities with those of the MDDELCC, with the Société du Plan Nord, with the Eeyou Istchee James Bay Regional Government, with the Cree Nation Government, with the Eeyou Planning Commission, and with the applicable local Cree administration when a project's impacts and benefits in the Territory are analyzed.

On the whole, the Gouvernement du Québec must ensure that any organization mandated under the current MERN initiative to review any of the impacts and benefits of northern projects are familiar with northern contexts and prepared to adapt accordingly. The JBACE could play its advisory role in this regard.

For example, any organization that reviews a project's financial aspects must be prepared to publish documents that are accessible to the Cree (in English and Cree).

Beyond this, the JBACE is not opposed to the intention to empower MERN project officers that will help coordinate the exchange and access of project-related information with its regional offices and concerned communities. We believe that these measures are positive steps forward. However, the only MERN regional offices in the vast Nord-du-Québec Administrative Region are located in Lebel-sur-Quévillon and in Chibougamau. The MERN should consider the setup of temporary satellite offices in host communities given the distances.

### *Recommendations*

The tools that the MERN will develop should reflect the realities experienced by the communities that live with development projects. They should include information on the perceptions of communities in light of development, and on legal and governance contexts.

Environmental and social impacts must be always considered on par with the economic costs and benefits of development projects. We question the 'value-added' of creating analyses 'silos' of project impacts and benefits, and stress that if this is to occur, efforts will be required to ensure coordination and collaboration with the various other organizations involved in the planning and of development projects.

#### b) Need to strengthen capacities to monitor and follow-up

The Cree and Jamesian communities are not strangers to development. They have regrettably experienced the residual effects of abandoned and improperly restored mineral exploration and exploitation sites in the past. But they have also gained much experience with post-project monitoring activities and restoration works with more recent projects. We feel that improved Cree and Jamesian awareness of, and inclusion in, such post-project monitoring and restoration activities are the most sensible ways forward. We thus support the MERN's intention to bolster these capacities for the sake of the concerned Cree and Jamesian communities.

We also hold, however, that even minor exploration projects that include consistent and open opportunities for community awareness and implication in monitoring, follow-up, and restoration activities can foster relationships of understanding and trust between communities and project proponents. Over time, such relationships may serve as interesting precedents for subsequent and more substantial development initiatives. And so, whether ministerial authorizations are required for project monitoring and restoration activities or not, we believe that collaborative post-project monitoring and restoration activities – including

access to information regarding these activities – as prescribed *modus operandi* for proponents and the MERN, can greatly contribute to project acceptance in host communities.

Here again, the Cree Nation Government and the Eeyou Istchee James Bay Regional Government already have important roles to play in such matters in relation to mineral development in light of the governance regime in the James Bay Territory and the revised *Mining Act* (CQLR c. M-13.1). The MERN must recognize these roles and build on them for other types of projects.

Beyond this, we encourage the MERN to provide greater detail on the new resources that will be devoted to the inspection and restoration of project sites, and on community-based activities therein – whether for large or small projects. For those projects occurring in the Territory, we reiterate the special status of involvement of the Cree people in the application of the Section 22 environmental and social protection regime, thus warranting Cree access to information on, and involvement in, the monitoring and restoration projects whether large or small.

Finally, the sustainable planning of development projects and their subsequent monitoring, pre-supposes that there is a clear understanding of the receiving environments of those projects, and of the capacities of those receiving environments to support new or additional projects. In a sense, the acceptance of one or series of projects in a given area today may exceed the capacities of that area's ability to accept a future project. This inevitably raises the issue of the current understanding of the state of the environment, as well as the issue of cumulative effects. As such, the planning and social acceptability of individual development projects is indeed tied to the wider, regional issue, of the cumulative effects of multiple projects in a given area. The current initiative must account for this.

#### *Recommendations*

The MERN should detail the resources that will be devoted to the inspection and restoration of project sites, and on community-based activities therein. The ministry should also ensure Cree access to information on, and involvement in, the monitoring and restoration of project sites, whether large or small.

The MERN must ensure that the current initiative aids in developing a better understanding of the receiving environments of development projects, and that it facilitates the planning of such developments in a manner that accounts for the cumulative effects thereof.

## ***Recommendations***

The proposals in the Green Paper are a step in the right direction. The comments offered in this brief are aimed at strengthening them, and at aligning them with northern realities in a manner that reflects the guiding principles of the JBNQA and the governance regime applicable in the James Bay Territory.

We thus recommend the following:

- 1. Regarding the unique concept of social acceptability in the James Bay Territory covered by Section 22 of the JBNQA**
  - The MERN should recognize the existing framework for evaluating the social acceptability of resource development projects in the James Bay Territory. This framework is built on the various entities created in virtue of Section 22 of the JBNQA and on the region's administrations and planning bodies. This framework represents a tested means for ensuring that projects occur in a manner that is acceptable to the inhabitants and communities of the Territory.
- 2. Regarding the need to clarify roles and responsibilities**
  - The MERN should outline how it will go about planning and regulating development while, at the same time, supporting that development in a manner that does not jeopardize a credible and neutral information and consultation process upon which the social acceptability of projects will be based.
- 3. Regarding the need to update the land use planning process**
  - The MERN must account for the already-existing institutions and procedures regarding the development of land use planning in the James Bay Territory. These local and regional institutions must be assured a central role in the land use planning process.
- 4. Regarding the contribution of strategic environmental assessment**
  - SEAs should be employed in the context of policies, plans and programs, as well as in the context of land use planning exercises such as the development of PATPs.
  - An independent and inter-ministerial body should be setup to supervise, to oversee, and to guide the various ministries that will be tasked to undertake SEAs on their respective PPPs and land use planning exercises.
  - A consultative authority, specific for the lands subject to the JBNQA, should be setup to coordinate and oversee the consultations that must occur for SEAs when dealing with PPPs or land use planning initiatives that may have an influence on the Territory and its Cree and Jamesian inhabitants
- 5. Regarding the need to establish predictable information and consultation processes**
  - The MERN should address the special status of involvement of the Cree in matters relating to information-exchange and consultation by the proponent.
  - The MERN should ensure coherence with other current initiatives relating to the exchange of information and consultation in the context of development projects, and with the existent procedures relating to these matters in light of the governance regime in the Territory and the revised *Mining Act*.

- The MERN should consider building on the work that is already being done in relation to information and consultation matters by the existing institutions in the Territory. These institutions already play a role in facilitating and coordinating such exchanges between project proponents and the Territory's local and regional stakeholders and citizens.

**6. Regarding the need to strengthen capacities to analyze project impacts**

- The tools that the MERN will develop should reflect the realities experienced by the communities that live development projects. They should include information on the perceptions of communities in light of development, and on legal and governance contexts.
- Environmental and social impacts must be always considered on par with the economic costs and benefits of development projects. We question the 'value-added' of creating separate analyses 'silos' of project impacts and benefits, and stress that if this is to occur, efforts will be required to ensure coordination and collaboration with the various other organizations involved in the planning and of development projects.

**7. Regarding the need to strengthen capacities to monitor and follow-up**

- The MERN should detail the resources that will be devoted to the inspection and restoration of project sites, and on community-based activities therein. The ministry should also ensure Cree access to information on, and involvement in, the monitoring and restoration of project sites, whether large or small.
- The MERN must ensure that the current initiative aids in developing a better understanding of the receiving environments of development projects, and that it facilitates the planning of such developments in a manner that accounts for the cumulative effects thereof.