



June 6, 2016

The Honourable Luc Blanchette
Minister for Mines
Ministère de l'Énergie et des Ressources naturelles

Subject: Comments on the Strategic Vision for Mining Development in Québec

Dear Sir:

By virtue of the James Bay and Northern Québec Agreement (JBNQA), the James Bay Advisory Committee on the Environment (JBACE) is the official forum for responsible governments concerning the formulation of measures that might affect the environment and communities in the Eeyou Istchee James Bay Territory. It is in that capacity that the JBACE is writing to share some observations regarding the Strategic Vision for Mining Development in Québec you unveiled last April.

The JBACE especially wishes to comment on the objective of improving the transportation network and facilitating access to the Plan Nord territory for mining companies. In our opinion, before implementing such an initiative, due consideration must be given to the supporting capacity of ecosystems and how "opening up the territory" will affect the hunting, fishing and trapping rights guaranteed to Aboriginal people under the JBNQA.

The JBACE recommends that a strategic environmental assessment be conducted prior to the implementation of road or mining infrastructure projects in order to identify the major environmental and social issues and, thereby, consider the cumulative effects of these projects, in particular in relation to the vast network of forest roads.

As early as 2010, the JBACE asked the then minister responsible for natural resources and wildlife to conduct a regional assessment of the environmental effects of forest road projects on woodland caribou habitat. The recommendation stemmed from the finding that environmental assessments conducted at the project level do not consider impacts at the landscape level, nor the cumulative effects. An assessment at the regional level is in keeping with the Strategic Vision's proposed actions for preventing and mitigating environmental impacts.

The JBACE notes that one of the proposed actions to promote citizen participation is to create indicators to monitor the social impacts of mining projects. This is a crucial action given the JBNQA provision that consideration must be given to the social

impacts of development. In light of its experience with the effects of mineral exploration and projects near water on the Crees' traditional pursuits, the JBACE would be happy to collaborate on this initiative.

Yours truly,

A handwritten signature in blue ink, appearing to read 'M. Saganash', is placed on a light blue rectangular background.

Melissa Saganash
Chairperson

cc: Matthew Coon Come, Chairperson, Eeyou Istchee James Bay Regional Government
Matthew Coon Come, Chairperson, Cree Nation Government
Line Drouin, Associate Deputy Minister for Mines, MERN
René Dubé, Chairperson, Administration régionale Baie-James
François Dupuis, Director of Aboriginal Affairs, MERN
Yvon Boilard, Chairperson, Hunting, Fishing and Trapping Coordinating Committee
Michael Barrett, Chairperson, Kativik Environmental Advisory Committee