



September 7, 2012

The Honourable Peter Kent  
Minister of the Environment  
Government of Canada

**Subject: Comments with regard to Canada's 2020 Biodiversity Targets**

Dear Minister:

In keeping with its mandate in respect of the environmental and social protection regime established by the James Bay and Northern Québec Agreement (JBNQA, Section 22), the James Bay Advisory Committee on the Environment (JBACE) hereby submits its comments on *Canada's Draft 2020 Biodiversity Goals and Targets*. The goals and targets rightly underscore Canada's abundant ecosystem services while ensuring biodiversity conservation. Biodiversity is even more important for the James Bay Cree because of their close relationship with the environment through their traditional hunting, fishing and trapping pursuits. One of the purposes of the Section 22 regime is to minimize the negative impacts of development on the rights and guarantees of Aboriginal people established by the JBNQA.

***Aboriginal knowledge and practices***

We think it is crucial to maintain Target 18 of the Strategic Plan adopted by the Parties to the Convention on Biological Diversity in Aichi. Target 18 provides that the traditional knowledge and practices of indigenous communities are to be respected and that indigenous communities are to participate in implementing the biodiversity targets. In our opinion, this is a vital issue that must be reflected in a specific target for Canada.

That being said, the JBACE endorses Canada's Draft Target 13, which calls for better integration of traditional knowledge and enhancing of the scientific base for biodiversity. In this respect, we would like to emphasize the importance of mobilizing the financial resources needed to achieve these targets, which is why we believe that Canada should strengthen its biodiversity targets by incorporating Target 20 of the Aichi Strategic Plan.

***Protected areas***

The James Bay territory has been the site of major development projects since the 1970s, and even greater pressure from development is expected in the coming years with the anticipated implementation of the Plan Nord. The Québec government has pledged to protect 20% of the territory covered by the Plan Nord by 2020. This exceeds Canada's Draft Target 1. However, the JBACE is stressing the importance of moving up ecological planning of conservation initiatives under the Plan Nord; otherwise, only those areas that are of no interest for mining, forest or hydroelectric development will be designated as protected areas. Furthermore, the JBACE has stressed that the cultural value of sites for the Crees must be given as much importance as their ecological value when establishing protected areas.

***Species at risk***

Considering the key role that wildlife harvesting plays in the Cree traditional way of life, the JBACE endorses Draft Target 2 regarding species at risk. However, in the comments it submitted in February 2012 with respect to the Recovery Strategy for the Woodland Caribou (Boreal Population), the JBACE emphasized the need for better coordination of federal and provincial measures and better sharing of data on the status of caribou populations.

***Forest management***

While the JBACE is in agreement with Draft Target 5, it must also acknowledge the considerable progress made over the last 10 years in sustainable forest management in the James Bay territory. The Agreement Concerning a New Relationship Between le Gouvernement du Québec and the Crees of Québec established an adapted forestry regime which guarantees consultation of the Crees during forest management planning. This in turn facilitates the implementation of harmonization measures to balance timber harvesting with Cree traditional activities in the bush. There is room for improvement, though, including with regard to acknowledgement of Cree land use and economic benefits.

***Climate change***

Adaptation to climate change, as advocated in Draft Target 11, is a major issue in the James Bay territory. Cree communities are especially impacted by global warming because thinner ice and a shorter ice season make travelling to traplines more dangerous. Considering the repercussions for the Crees' hunting, fishing and trapping rights, the JBACE believes it is of utmost importance to give affected communities the tools to adapt to the impacts of climate change. At the same time, it encourages the Government of Canada to adopt the strictest greenhouse gas reduction targets.

***Conclusion***

Biodiversity is key to the Cree way of life and a vital component of the environmental and social protection regime of Section 22 of the JBNQA. The JBACE therefore encourages the Government of Canada to implement the Draft Biodiversity Targets, in particular those related to forest management, protected areas, species at risk and climate change. In addition, the JBACE recommends strengthening the Draft Targets by incorporating Targets 18 and 20 of the Aichi Strategic Plan: affirming respect for the traditional knowledge and practices of indigenous people and mobilizing the financial resources needed to implement the biodiversity targets is crucial.

Yours sincerely,

*[ORIGINAL SIGNED]*

Guy Hétu  
Chairman