



Comité consultatif pour l'environnement de la Baie James
James Bay Advisory Committee on the Environment
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James Bay Advisory Committee on the Environment

Commentary regarding Environment Canada's *Recovery Strategy for the Woodland Caribou (Rangifer tarandus caribou), Boreal Population, in Canada*

February 13th 2012

Introduction

The James Bay Advisory Committee on the Environment (JBACE) has the mandate to review and oversee the administration of the environmental and social protection regime established by and in accordance with Section 22 of the James Bay and Northern Quebec Agreement (JBNQA). The JBACE exercises its mandate as the preferential and official forum for responsible governments concerning the adoption of policies, laws, regulations or land use measures having an incidence on environment and social setting of the James Bay Territory.¹

The Committee is concerned about the Woodland Caribou populations extant in the James Bay Territory given their cultural significance for First Nation communities and the species' status under Canada's *Species at Risk Act* and Québec's *Act respecting Threatened or Vulnerable Species*. Our concerns are now amplified due to the accelerating pace of industrial development occurring in the James Bay Territory.

In light of its mandate and concerns, the present note offers the Committee's comments and recommendations regarding the document entitled, [Recovery Strategy for the Woodland Caribou \(*Rangifer tarandus caribou*\), Boreal Population, in Canada](#) ('draft strategy'), currently open for public commentary.

¹ See [Appendix I](#) for a map of the James Bay Territory.

General comments

The draft strategy is based on sound science. It succeeds in outlining the general considerations that must be addressed when producing the Action Plans for Woodland Caribou populations across Canada. It also highlights the broad lines of potential actions that should be considered by the various provincial and territorial recovery initiatives.

The draft strategy offers a set of comprehensive methods, a practical timeframe, and a clear description of the risks and threats affecting these local populations. It affirms that the cumulative nature of these threats must also be considered given the species' limited potential to recover from rapid, severe population declines.

We concur that a reduction in suitable habitat² and predation are primary threats to local population survivability. We thus support efforts to delineate the critical habitat required by the various local populations. The Committee also supports the immediate objectives of maintaining or increasing population sizes and the extent of available suitable habitats across Canada.

In light of the draft strategy's overall goal of achieving self-sustaining local populations nationwide, to the extent possible, we are mindful that this will be a very long process. Rigorous long-term monitoring of all provincial, territorial, and federal recovery initiatives is crucial. This will entail long-term communication and coordination between these jurisdictions. Added clarity regarding coordination and monitoring of recovery initiatives would greatly improve the draft strategy. The draft strategy must also clarify the means of reviewing and updating approaches and measures due to changing conditions and information over time.

The JBACE thus recommends that the draft strategy more clearly outline the tangible means by which it will be linked to the recovery measures undertaken by provincial or territorial jurisdictions under their own respective legislation over time. The draft strategy should also include clear provisions for the exchange of monitoring information and make reference to all applicable inter-jurisdictional agreements.

² Namely due habitat loss, degradation and fragmentation.

Specific comments concerning the James Bay Territory

Information and assessment of the situation

We reiterate that the draft strategy proposes a valuable approach for the recovery of the species across Canada. However, the Committee notes the marked imprecision and uncertainty regarding the available data and knowledge underlying the draft strategy's current assessment of the situation for Québec, including our area of concern, the James Bay Territory.

The current draft strategy does not provide adequate estimates for the various local populations of Woodland Caribou in Québec or in the James Bay Territory.³ Instead, the Québec populations and their local ranges are considered in a consolidated manner, at very coarse scale, subject to the highest degree of uncertainty.

In light of the knowledge deficiencies regarding the local populations extant in Québec and in the James Bay Territory, the JBACE questions the accuracy of the draft strategy's assessment of the current situation for these lands. The methods presented in the draft strategy are well-founded, but its current assessment of the situation for Woodland Caribou populations in Québec, as a whole, is based on very uncertain and incomplete knowledge and data. Evidently, the current assessment in the federal strategy does not account for all of the information held by the provincial and regional government at this time.

In order to remedy this unfortunate situation, we recommend that population and range distribution data regarding all local populations extant in Québec and in the James Bay Territory be updated as soon as possible. Once updated, the draft strategy's assessment of the situation must then be revised in consequence.

Again, adequate coordination and communication will be pivotal between the responsible ministries in both federal and provincial governments to ensure a timely exchange and assessment of current information. The JBACE stresses that the *Cooperation Agreement for the Protection and Recovery of Species at Risk in Québec*, signed between the governments of Canada and Québec in February 2007, already provides a sound administrative basis for such exchanges.

³ Discrete population estimates for only five local populations in Québec are provided (Val d'Or, Charlevoix, Pipmuacan, Manouane and Manicouagan), but are not current. A rough and consolidated estimate of 9000 individuals for Québec as a whole is cited as both a minimum and maximum.

Local populations in the James Bay Territory

Despite the immediate need to revise the assessment of the situation for Québec populations based on updated information, the local populations extant in the James Bay Territory may already represent populations with high connectivity potential.

The Committee recommends that the connectivity potential of the populations in the James Bay Territory be addressed as soon as possible and that the draft strategy and subsequent Action Plans be modified in consequence.

Habitat protection in the James Bay Territory

As expressed in the draft strategy, Woodland Caribou populations inhabit the boreal forest and prefer areas of mature undisturbed conifer stands with well-developed lichen cover (arboreal or terrestrial) throughout the year. Woodland Caribou tend to select different discrete habitats within their range at different times of the year, and generally avoid areas with sparse conifer cover.

However, credible up-to-date distribution and population metrics for the local populations in Québec and in the James Bay Territory are not available in the draft strategy. As a result, the draft strategy's proposed management approaches concerning the protection of key areas frequented by the species cannot be implemented at this time in Québec or in the James Bay Territory.

Only following a revised assessment of the situation for the populations in Québec and in the James Bay Territory, can such measures be taken. Once reassessed, the JBACE insists that all habitat protection initiatives must coincide with the critical habitats required by this species in order to ensure connectivity, population sustainability and genetic diversity.

These habitat protection initiatives may take the form of legislated protected areas or otherwise, insofar as they focus on:

- The critical habitat required by the local populations;
- The cumulative impacts caused by forestry activities, road construction, or other industrial activities affecting the local populations; and,
- Protection or recovery actions which can be implemented in collaboration by the various stakeholders (e.g. governments, First Nation communities and industries).

The JBACE has expressed its support for an assessment of the cumulative impacts affecting Woodland Caribou populations and of the creation of protected areas⁴ which include Woodland Caribou ranges or habitats on several occasions in recent years. These issues must be considered in the final draft strategy and subsequent action plans.

⁴ Particularly when these protected areas are proposed by First Nation parties.

Ongoing efforts in the James Bay Territory

The government of Québec is taking steps to protect the species across the province, including the four recognized local populations of Woodland Caribou residing in the James Bay Territory. The province's efforts will continue to progress in parallel with the federal government's elaboration of this draft strategy and subsequent Action Plans.

Both governments continue to manifest the common interest to protect this vulnerable species, such that an opportunity to strengthen the 'operational link' now exists.

The JBACE thus recommends that both governments coordinate their operational efforts in order to maximize efficiency and timeliness. We propose this recommendation as an avenue to improve the coordination of specific operational actions and measures used to preserve Woodland Caribou habitats and local populations.

Conclusion

The draft strategy is indeed a valuable tool. However, we are of the opinion that the draft strategy's current 'diagnosis' of the situation in Québec and the James Bay Territory must be revised with the benefit of the currently-available and up-to-date information. Recovery measures and actions must then be adapted and modified accordingly.

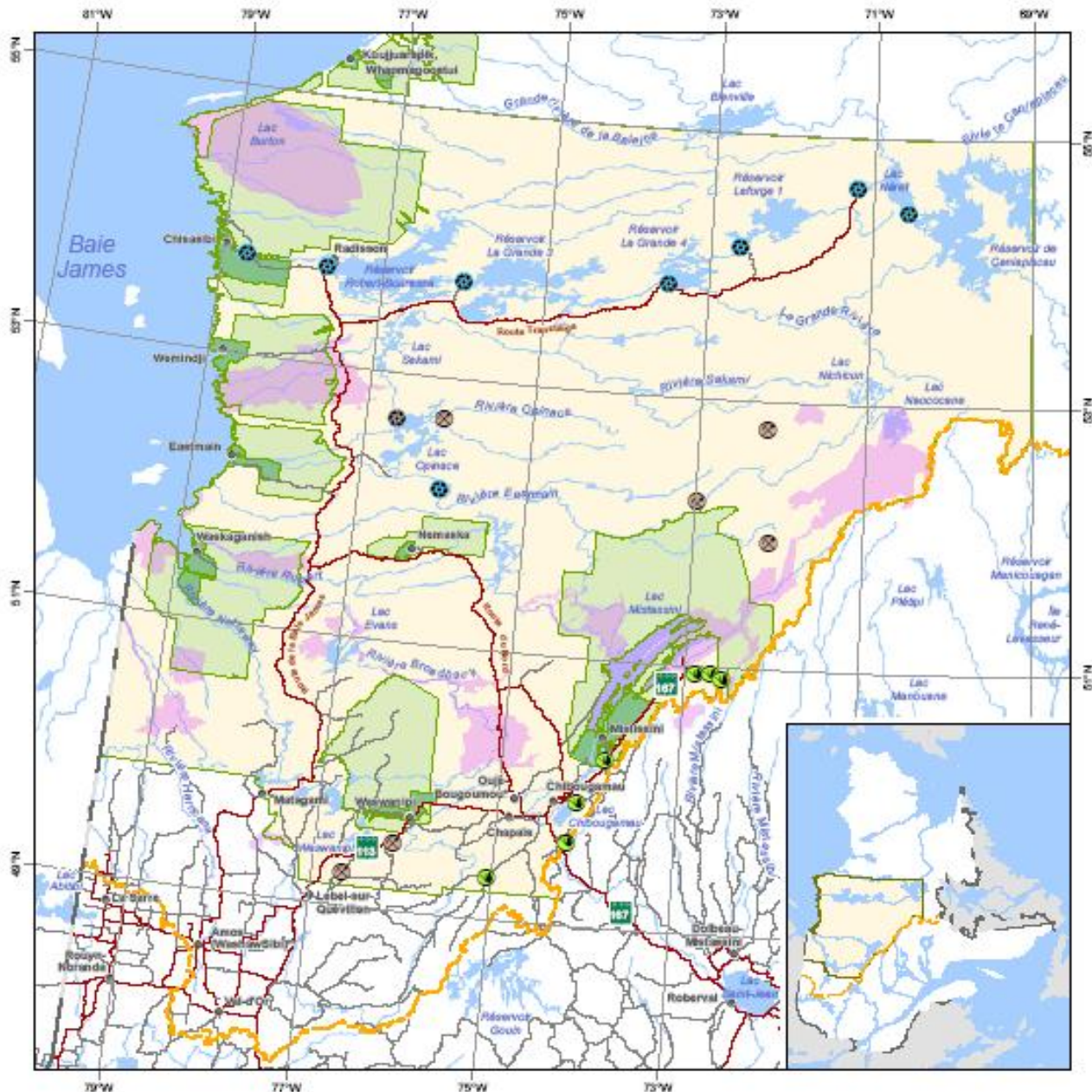
All jurisdictions must also commit to long-term collaboration and coordinated monitoring and review, in order to ensure the survivability of Woodland Caribou population in the James Bay Territory and elsewhere.

Furthermore, due to the inevitable time lag between completed recovery actions and the actual manifestation of results in the local populations, a drastic acceleration in the implementation of protective measures is needed. An accelerated schedule for the implementation of protective measures is now more important than ever, given the hastening pace of industrial development occurring in the James Bay Territory. All stakeholders and governments must act with haste to implement recovery actions to avoid replicating past delays. While inaction, or a failure to immediately seize the current opportunity, will only magnify the difficulties for the recovery of the species.

Finally, the proactive implementation of protection measures for the Woodland Caribou populations extant on the James Bay Territory will contribute to the conservation of the Territory's biodiversity as a whole. From this perspective, the protection of this keystone species will offer regional benefits for the maintenance of biodiversity and, in turn, help to perpetuate the Cree traditional way of life and the continued exercise of Cree traditional pursuits.

Appendix I – Map of the James Bay Territory per Section 22 of the JBNOA

Territory covered by the environmental and social protection regime



Limits

- Territory covered by the regime ¹
- Cree Category I lands
- Cree Category II lands
- Southern limit of JBNOA Territory
- Border

Infrastructures

- Mining project
- Hydroelectric power station
- Hydroelectric power station in construction

Conservation areas

- Exceptional forest ecosystem
- Protected area

¹ The Crees do not recognize the southern limit of the regime as defined on this map
 - Oujé-Bougououou Category I and II lands are under negotiation
 - The Washew Sibé Eeyou Association is temporarily based in Amos

Sources

- Land division, mine site, MRNF-Québec, 2011
- Exceptional forest ecosystem, MRNF-Québec, 2011
- Protected area, MDDEP, 2011
- Hydroelectric infrastructures, CEHQ, 2011

