



Appendix – Questions and comments

QC -1: The proponent must demonstrate that other compensation options were considered and evaluated in addition to financial participation in the research project. The proponent should describe these options and why they were not pursued.

Although the compensation plan submitted by the proponent is welcomed by the monitoring committee and thought the proposals seem relevant and innovative, the compensation plan does not make it possible to offset the losses of compensate for the loss of wetlands and hydric environments. It would have been desirable for the proponent to also provide for concrete restoration or enhancement work on wetlands and hydric environments or compensation work for other natural environments or environmental problems. It remains important that the compensation plan include certain measures specifically aimed at improving wetlands and hydric environments or, at least, natural environments.

RQC-1: In the impact assessment, the proponent has undertaken to compensate for unavoidable wetland losses and for the alteration of fish habitat by identifying potential community-supported compensation projects in consultation with local stakeholders (Uumajuit warden, municipality, elders, youth, women, etc.). Initial discussions concerned compensation work and habitat restoration. However, the monitoring committee quickly expressed its disagreement with the concept of restoring or creating new wetlands in a northern environment where these habitats are abundant and given that the effectiveness of such undertakings is not guaranteed and uncertain.

As mentioned in the introduction of the compensation plan, Innavik Hydro therefore preferred to adopt an exploratory rather than a conventional approach to compensation with the aim of enhancing the natural environment and building on existing knowledge for the benefit of local communities. Such an approach is all the more justified and relevant since the Innavik project represents a unique opportunity to document the effects of a run-of-the-river hydro plant in northern conditions.

QC-2: The proponent must improve its present compensation plan for wetlands and hydric environments with tangible work to create or restore wetlands or hydric and natural environments, particularly for fish habitat.

RQC-2: As mentioned above, Innavik Hydro discussed this issue with the monitoring committee, which expressed its disagreement with the idea of restoring or creating new habitat. Instead, committee representatives prefer to take advantage of this opportunity for other initiatives than improving wetlands and aquatic areas, which are abundant. The proponent reiterates its intention to compensate losses through a project that aims to enhance the natural environment and ensure knowledge transfer for the benefit of local communities.



On March 1, 2023, the monitoring committee met in Inukjuak to discuss questions and comments that it had received on the compensation plan. Once again, committee members reiterated that wetlands are abundant.

The Northern Village is responsible for planning the 5 year community expansion plan, where it is required to determine the area where the community can continue to grow, this is now becoming a challenge due to the surroundings of the village containing abundance of wetland and Hydric environment, which provides unstable grounds to develop infrastructure and the village is seriously considering the communities expansion across the river in front of the community, since there is more stable ground to develop. However, this plan requires a bridge in front of the community, but the northern Village of Inukjuak has very limited financial resources to realize this very infrastructure. For this reason, the monitoring committee, being aware of these challenges by the community is very reluctant to either create or enhance wetlands and/or hydric environments. When the abundance of these is preventing the community to grow and develop further. The monitoring committee members feel it would provide additional challenges for the community if they were to enhance or create more wetlands or hydric environment in proximity of the community. However, with reservations, the committee members understand the commission's position and is willing to engage in discussions and consider on opportunities to carry out concrete initiatives to restore wetlands and aquatic areas as well as to enhance the initial compensation plan.

Sanirqamatik Creek could be interesting in a number of regards: this watercourse featured a road crossing even before the generation facility was built. The instability of the stream banks and the embankment at this crossing has caused considerable erosion, which has resulted in habitat degradation immediately downstream. This area includes a riparian marsh as well as potential fish habitat. The proponent and the monitoring committee will work together with PESCA Environnement to study the feasibility of carrying out various types of habitat restoration work in light of the fact that the crossing is due to be upgraded by CRT Construction in Summer 2023. This study will conclude with a work proposal that will be accepted by the committee and added to the compensation plan.

With regard to fish habitat, the proponent reiterates that Fisheries and Oceans Canada determined that no compensation was required on account of the gains in nursery, wintering and foraging habitat as well as refuges for locally present species (brook trout, lake whitefish, lake cisco, round whitefish, longnose sucker).

QC-3: The proponent must specify whether feedback will be provided to the Innavik monitoring committee on the implementation of the compensation plans and how this will be done. The proponent must also specify whether knowledge transfer will be carried out more broadly to the community. In addition, the proponent must inform the Kativik Environmental Quality Commission annually of the implemented compensation plans, including the results of the various follow-ups.



RQC-3: The monitoring committee will be active for the entire service life of the project and will be kept abreast of all conditions of the authorization certificate. The compensation plan includes an important component that provides for knowledge transfer to the community. The proposed project will encourage participation by the community of Inukjuak. Knowledge transfer and youth-elder sharing are critical components of this project. Lastly, the proponent undertakes to inform on an annual basis the Kativik Environmental Quality Commission on the implementation status of the compensation plans, including the results of various monitoring efforts.

As a reminder, the proponent agreed before the project was authorized to compensate for the unavoidable loss of wetlands. To this effect, a consultation with the municipal stakeholders (Uumajuit Warden, municipality, elder, youth, women, etc.) was planned by the proponent. It has been indicated that other measures will also be proposed at the stage of the plans and specifications for the construction of the infrastructures. These details will make it possible to target all the components for which mitigation measures will have to be proposed in order to limit the impacts, particularly on wetlands.

QC-4: The proponent must justify how this compensation plan will compensate for unavoidable losses of wetlands and fish habitat and specify whether all identified municipal stakeholders have been consulted. If so, the proponent must specify the concerns and comments expressed by these stakeholders and how they have helped improve the present compensation plan. If not, the proponent must justify why these stakeholders were not consulted.

RQC-4: As mentioned in Section 5 of the proponent's proposed compensation plan, the approach favoured by Innavik Hydro to compensate for fish habitat and wetland losses was discussed by the monitoring committee on May 18, 2022, in Inukjuak. This committee brings together representatives of the Northern Village; the Pituvik Landholding Corporation; the Hunting, Fishing and Trapping Association; Uumajuit wardens, the Avataq Cultural Institute; the local population (one elder and one woman representative from Inukjuak); as well as representatives of Innavik Hydro and CRT Construction.

The committee accepted the proposed compensation plan on the condition that it would include water salinity monitoring at the mouth of the Inukjuak River. This is a concern that stems from projects in James Bay, where the installation of water retaining and flow reduction structures in certain rivers has altered the salinity at their mouths (by reducing freshwater flow). Salinity monitoring was added to the program based on a methodology that will be discussed and developed with researchers involved in the project.

The proposed compensation plan is all the more relevant given that the water intake for supplying the Northern Village with drinking water is located at the mouth of the Inukjuak River and the fact that the community consumes fish taken from this river.

As a reminder, prior to the authorization of the project, the proponent agreed to discuss the possibilities of compensation with the authorities concerned, including the Ministère des Forêts, de la Faune et des Parcs (MFFP) and Fisheries and Oceans Canada (DFO).



QC-5: Although DFO has concluded that no compensation is required, the proponent must still consult the Wildlife sector of the Ministère de l'Environnement, de la Lutte contre les changements climatiques, de la Faune et des Parcs in order to present its compensation plan for fish habitat and improve it, if necessary.

RQC-5: The proponent undertakes to present the compensation plan for fish habitat to the wildlife division of the MELCCFP.

The proponent also agreed to ensure a follow-up, over a period of 10 years of the developments that will be carried out (e.g. creation of habitats, improvement work or others) following recommendations made by members of the community consulted on the establishment of appropriate compensation measures for the modification of fish habitat. The follow-up program was to be developed in collaboration with the MFFP and DFO stakeholders.

QC-6: The proponent must indicate if this follow-up program has been developed and, if so, to submit it. If not, the proponent must specify when this program will be developed and transmitted to the Provincial Administrator of Chapter 23 of the James Bay and Northern Québec Agreement.

RQC-6: The proponent is currently working with DFO to develop the monitoring program required by the authorization issued under the *Fisheries Act*. The final version will be submitted to the provincial administrator of Section 23 of the James Bay and Northern Quebec Agreement. The proponent undertakes to collaborate with the wildlife division of the MELCCFP with regard to fish habitat.

QC-7: The proponent must specify how and when it will fulfill its obligations under condition 10 of the certificate of authorization of August 23, 2019, regarding the public and KEQC communication fish mercury monitoring program results, in consultation with the government agencies concerned, including the Nunavik Regional Board of Health and Social Services.

RQC-7: It is planned to commence the monitoring program for mercury levels in fish tissue in the summer of 2025 and resume monitoring in 2027, 2029, 2032 and 2037. In 2019, the proponent contacted the Nunavik Regional Board of Health and Social Services (NRBHSS) to discuss how monitoring results would be submitted and presented. Baseline data from 2019 were transferred to the NRBHSS and it was agreed that monitoring results would be sent to this organization, which would then communicate the said results as well as recommendations to the community. Please find in the appendix a presentation prepared by the NRBHSS that was shared with the community at the information session held on January 27, 2020.