



Brief to the Evaluating Committee Holding  
Public Consultations in Montreal on Draft Directives for Phase I of the  
Eastmain-1-A-Rupert Diversion Environmental Review Assessment

Environment Committee  
Municipality of Sanikiluaq  
Sanikiluaq, Nunavut

May 28, 2003

My name is Moses Novalinga. I am representing the Environment Committee of the Municipality of Sanikiluaq. I am here today because we consider Sanikiluaq an Affected Community of the Eastmain-1-A-Rupert Diversion Project.

We are affected because:

- We live downstream from Hydro Quebec developments in northern Quebec and the Inuit of Sanikiluaq are dependent on the Hudson-James bay current system for our marine food sources.
- We have growing concerns about what is entering into our current system from forestry operations, agricultural sources, sewage and the watersheds, rivers and estuaries altered by hydroelectric development
- We are concerned and want to know what would be entering and impacted upon in the Hudson Bay marine ecosystem from this additional Project of the Proponent
- We know our concerns are legitimate both from the traditional knowledge work we have done and from scientific knowledge about the
  - Effects of river hydrology on nutrient and sediment supply in estuarine and coastal ecosystems, and
  - Dispersal, movement and bioaccumulation of contaminants from rivers and estuaries into the marine current system and marine food web.
- It is a concern we share with leading scientists, agencies and organizations throughout the world that recognize and know the value of ensuring marine environmental quality and protecting marine biological diversity.

- Therefore, we think the Proponent of this project must be directed by the Evaluating Committee to:
  - Recognize Sanikiluaq is an affected community, and
  - Demonstrate an understanding of our rights, interests, values and concerns, and to start recognizing and respecting them in planning and carrying out their proposed activities.

The draft directives acknowledge the significance of Traditional Knowledge in preparation of an Impact Statement by the Proponent. However, it refers only to the Traditional Knowledge of Crees, which leads us to question whether downstream effects and impacts on the marine environment will be given proper or adequate consideration.

If the Evaluating Committee believes this environmental review assessment is a planning tool then the review and development process must be slowed down, and placed in a regional context that includes the marine ecosystem. To this effect, the Proponent must be given a directive to specifically include coastal, estuarine and marine traditional knowledge of the James Bay Cree and the Inuit of Chisasibi for development of adequate baselines, impact predictions and the assessment of significance in the James Bay coastal and marine areas of the Hudson Bay ecosystem.

It is good the Evaluating Committee acknowledges the principle of Sustainable Development, and importance of assuring sustainability in development of a satisfactory Impact Statement by the Proponent. From our past experience with the Proponent, however, the issue of assuring sustainability by ensuring the full costs of development are identified, mitigated, compensated or offset is not likely to be properly addressed.

To this effect, the Final Directives must be explicit in instructing the Proponent to address the extent to which marine biological diversity specifically is affected by the

Project and steps that will be taken for protecting marine biological and cultural diversity and ensuring preservation of marine ecosystem integrity in the Hudson Bay system.

It is not sufficient to take into consideration only the terrestrial ecosystem. The full costs of development including downstream effects and impacts of dam construction and diversion projects on marine currents, marine biological diversity, marine ecosystem integrity, indigenous maritime cultures and marine-based communities, like Sanikiluaq and the Inuit of Chisasibi, must be fully acknowledged and addressed. We feel this is important to the Hudson Bay bioregion and the directives need to be consistent with the experience and knowledge that has emerged at the international level in the past 10 years.

The Evaluating Committee must recognize and subsequently issue to the Proponent explicit directives to this effect so that impacts of local, sub-regional, national and international significance are predicted, assessed and mitigated.

We are marine people in Sanikiluaq. The alteration of marine currents, and the content of what enters our marine food system from estuaries and rivers flowing out of Quebec into James bay must be identified, monitored, assessed and put into the proper context so that we have the insurance and resources we need to live and continue living our Inuit way of life in the Belcher Islands and Hudson Bay.

In Nunavut, the fact that the community of Sanikiluaq and the other Nunavut Hudson Bay communities need a healthy Hudson Bay to succeed is recognized. In Quebec, the community of Sanikiluaq, and Hudson and James bays, are non-existent because we are outside of the provincial jurisdiction. But, the decisions made in Quebec, or in the interests of Quebec, with respect to strategic infrastructure and hydroelectric development directly impact us. We are forced to live with the consequences of those decisions and, subsequently, in the shadow of Quebec.

I will keep the rest of my presentation brief, as the Municipality of Sanikiluaq intends to submit more detailed written comments on the draft directives to the Evaluating Committee:

First, we suggest that the geographical setting and general description of the environment in which the Project takes place be inclusive of the James Bay Marine Region as defined by the Canadian Parks Service (Heritage Canada).

Second, the Project's zone of influence for bays, estuaries and marine environments should be defined in its broadest not its narrowest extent. In our estimation and for the purpose of this Impact Statement, that would be the James Bay Marine Region.

Third, with regards to Cumulative Impacts, the Proponent must be directed to take the Hudson Bay marine ecosystem into full account, including the health and quality of life of Hudson and James Bay Inuit.

It is our view the Belcher Island economy and environment needs to develop in a stable, sustainable environment within the James Bay Marine Region. The Proponent is threatening this development and environmental stability with plans to further alter James Bay coastlines, estuaries, river flows and marine currents.

Forestry as well as other hydroelectric projects must be included in predicting, assessing, monitoring and mitigating cumulative impacts. We further request specific direction be given to the Proponent in the Directives to assess the cumulative and incremental effects of the proposed Great Whale and other elements of the larger "project" whether or not they are to occur in the next decade as per page 47 of Directives.

In doing so, we ask the Proponent to consider along with other studies Voices from the Bay: Traditional Ecological Knowledge of Inuit and Cree in the Hudson Bay Bioregion as baseline information for identifying, assessing and mitigating incremental and cumulative impacts over a 50-year period into the past and future.

Other questions the Environment Committee would like the Evaluating Committee to include in the Final Directives to the Proponent are:

- Is the Project justifiable in terms of ecological and economic sustainability?
- Will it impact critical ecological components in the Hudson Bay ecosystem?
- Will it change biological and cultural diversity in the James Bay Marine Region?
- Will these changes have negative or positive impacts? How will these changes be monitored and assessed?
- What benefits will the Project bring to the James Bay Marine Region and Hudson Bay ecosystem?

Fourth, we ask the Proponent be directed to include in its Impact Statement Monitoring and Follow-Up Programs for coastal and marine environments.

Finally, The Project creates Transboundary Issues, which the Proponent needs to address. To this effect, the Final Directives need to include a directive to the Proponent to identify and predict impacts on phytoplankton, benthics, anadromous fish, marine fish, marine mammals, migratory birds, ducks, waterfowl and polar bears in the James Bay Marine Region.

In closing, I am submitting to you *Voices from the Bay* and the *Qikiqtamiut Cookbook*. The *Qikiqtamiut Cookbook* was compiled and co-published by the Municipality of Sanikiluaq to help improve protein levels in Sanikiluaq youth. In addition to better understanding our reliance on marine foods, you will see pictures of the community, environment and lifestyle we seek to protect.

Nunavut Tunngavik Incorporated, the organization representing the Inuit of Nunavut in respect of Inuit rights arising under the Nunavut Land Claims Agreement and elsewhere, has given the Environment Committee of the Municipality of Sanikiluaq a letter in support of our objectives. It is attached to this brief and, if the Chair permits, I will read it now.