

**Comparative Table :**  
**Indigenous organizations comments integrated to the Wave 1 Report versus HFTCC comments**

<b>Offsetting and fish habitat reserves</b>	
<b>Comments integrated to the DFO report</b>	<b>HFTCC comments</b>
	<ul style="list-style-type: none"> <li>Proponents should demonstrate that all efforts have been made to avoid and mitigate the impacts of their projects before contemplating offsetting measures. To reach the objective of no net loss, <b>the priority should first be put on the restoration for offsetting the HADDs.</b></li> </ul>
<p><b><i>Monitoring</i></b></p> <ul style="list-style-type: none"> <li>It was suggested that <b>quantitative, performance-based metrics</b> should be used to judge the success of offsetting and be adaptable to different habitat types.</li> <li>How the success of offsetting would be assessed during post-project monitoring was a common question received.</li> </ul>	<ul style="list-style-type: none"> <li>The main metric to evaluate quality of habitat should be <b>the level of its natural integrity</b>. Past practices in habitat creation and enhancements have often shown that results are hard to predict and measure. Past practices in habitat creation and enhancements have often shown that results are <b>hard to predict and measure</b>.</li> <li>Special attention should be given to the monitoring process to assess the effectiveness of offsetting plans.</li> </ul>

	<ul style="list-style-type: none"> <li>• <b>Evaluating the impacts of a project on fish and fish habitat is challenging.</b> Measuring the size of the affected area is often the easy option although it can be a poor indicator if it doesn't consider the services rendered by the habitat. It can lead to projects that increase a given habitat area but negatively affect the whole ecosystem (e.g. dams, instream removal of sand or gravel banks).</li> </ul>
<p><b>Location</b></p> <ul style="list-style-type: none"> <li>• Many participants advocated for offsetting to be located <b>near the project impacts</b> that they were intended to counterbalance.</li> </ul>	<ul style="list-style-type: none"> <li>• Integrated planning of offsetting and banking over <b>large territorial units</b> should be developed.</li> <li>• In remote territories, where the level of fish habitat degradation is low, restoration opportunities can be hard to come by; offsetting plans often turn towards unnecessary enhancement projects in the region or towards restoration, enhancement or habitat creation outside of the region. The vastness of the territory and the low level of fish habitat degradation should not be used as an excuse to tolerate negative impacts of development projects in the region.</li> </ul>
<p><b>Location</b></p> <ul style="list-style-type: none"> <li>• Participants noted offsetting should represent an equal or <b>greater habitat quality improvement</b> than was impacted by the project.</li> </ul>	<ul style="list-style-type: none"> <li>• Creation and enhancement of natural habitats <b>should be regarded as a human intervention</b> that has the potential for unpredictable effects on ecosystem dynamics. They should be considered in very specific situations where an</li> </ul>

	aspect of the habitat function can be improved without negative impacts on the rest of the ecosystemé
<p><b>Communication with Indigenous Peoples</b></p> <ul style="list-style-type: none"> <li>• Participants noted that the explicit involvement of affected Indigenous communities <b>is needed, from early project planning</b> through the implementation of the project and its offsetting plan to the monitoring of offsetting performance.</li> <li>• Strengthened collaboration between FFHPP and Indigenous communities is needed <b>when reviewing specific offsetting plans.</b></li> <li>• <b>Indigenous knowledge and Indigenous rights and values</b> must be considered earlier in the planning process.</li> </ul>	<ul style="list-style-type: none"> <li>• Communities should be systematically consulted and involved.</li> <li>• DFO should therefore collaborate with Indigenous Nations and communities, <b>outside of the project-specific approval process</b>, to identify meaningful offsetting/compensation measures in areas likely to be subject to development activities (including for scientific research and knowledge acquisition, as stated above).</li> <li>• A special attention should be paid to <b>species reserved exclusively to the Native people and to species that are culturally important to local communities.</b></li> </ul>
	<ul style="list-style-type: none"> <li>• <b>Social acceptability</b> should be secured, so that the proponent’s planning is compatible with their fish management objectives and that the project makes sense for the nearby communities.</li> </ul>
	<ul style="list-style-type: none"> <li>• Higher proportions of offsetting plans dedicated to <b>scientific research and knowledge acquisition</b> that could help support management, development of best practices and decision-making</li> </ul>

<b>Effets cumulatifs</b>	
<b>Commentaires intégrés au rapport MPO</b>	<b>Commentaires du CCCPP</b>
<p><b><i>Scale and Scope</i></b></p> <ul style="list-style-type: none"> <li>Indigenous participants advocated for the need to consider <b>watershed or regional effects</b> to assess the impact works would have on natural systems and the values they support.</li> <li>The scale at which cumulative effects will be assessed needs to be clearly defined.</li> </ul>	<ul style="list-style-type: none"> <li>Cumulative effects assessments are essential in areas with a history of <b>large-scale resource development projects</b>.</li> </ul>
<p><b><i>Baselines and Thresholds</i></b></p> <ul style="list-style-type: none"> <li>The establishment of monitoring thresholds is needed to provide <b>measurable criteria</b> to ensure that the impacts of the projects are within the predicted range.</li> </ul>	<ul style="list-style-type: none"> <li><b>At stake is the expertise needed to "calculate" an effect</b> in accordance with its regional and local context. For instance, are proponents in a position to take into account the regional impacts resulting from recreational fishing, in addition to the impacts related to their own project?</li> </ul>
<p><b><i>Baselines and Thresholds</i></b></p> <ul style="list-style-type: none"> <li>Indigenous participants advocated for the use of <b>Indigenous knowledge</b> to establish baseline conditions to better understand potential cumulative effects.</li> </ul>	

	<ul style="list-style-type: none"> <li>Assessments of cumulative impacts that rest solely on proponents have a much higher chance of being incomplete. Ideally, cumulative impacts should be the subject of a <b>strategic study at the regional level and carried out by an independent entity</b>, rather than by the proponents involved. These studies could be carried out at fixed intervals (for example at every 10 or 15 years).</li> </ul>
	<ul style="list-style-type: none"> <li>Given that <b>data required to carry out cumulative impact assessments are often not easily accessible to proponents</b> (or organizations likely to carry out strategic analysis), part of the solution would be to require from them a “contribution to the assessment of cumulative impacts”. The proponents would commit to provide the data gathered from their projects, which is necessary for future cumulative impact assessments.</li> <li>The effects of previous <b>large-scale resource development projects</b> are generally underestimated by proponents, primarily due to the unavailability of data at the time of preparation of their impact assessment.</li> </ul>
	<ul style="list-style-type: none"> <li><b>Stronger collaboration between the provincial and federal governments, government departments, organizations and academia</b> will be needed to effectively assess the cumulative impacts of development projects on fish and its habitat.</li> </ul>