

Important notice: this document is a courtesy translation and has no legal value. The original French resolution constitutes the official version of the resolution.

Note importante: ce document est une traduction de courtoisie et n'a aucune valeur légale. La résolution française originale constitue la version officielle de cette résolution.

RESOLUTION 919-082

Part 1: The identification of the Mutehekau Shipu / Magpie River

WHEREAS the *Mutehekau Shipu* (Innu: “the river where the water passes between square rocky cliffs”ⁱ or “the river with steep banks and pointed rocks”), or the *Magpie River* is approximately 290 km in length with a watershed extending over 7650 km² and constitutes a river of importance in the *Nitassinan*, the Côte-Nord, Quebec and Canada; and

WHEREAS the *Mutehekau Shipu / Magpie River* is located in the *Nitassinan*, the ancestral territory of the Innu people of the Ekuanitshit community; and

WHEREAS, given the size of its watershed, the *Mutehekau Shipu / Magpie River* is the second most important river after the Romaine on the *Nitassinan* of the Ekuanitshifi Innu ; and

WHEREAS over 85% of the *Mutehekau Shipu / Magpie River* is located on the territory of the Regional County Municipality (MRC) of Minganieⁱⁱⁱ; and

WHEREAS the *Mutehekau Shipu / Magpie River* has exceptional potential for hosting whitewater expeditions^{iv} and is internationally renowned as a jewel of nature and as an adventure tourism and ecotourism destination, having ranked among the top ten rivers in the world for whitewater and rafting activities^{vi}, as well as among the top ten rivers in North America for canoeing^{vii}; and

WHEREAS unlike many internationally renowned rivers with similar characteristics, the *Mutehekau Shipu / Magpie River* does not currently benefit from any protected status, apart from a tiny section of a few kilometers near Lake Magpie, as well as the lake itself^{viii}; and

WHEREAS the *Mutehekau Shipu / Magpie River* is home to a wide range of species of flora and fauna, including the *ushashameku* (Atlantic salmon) whose status is “of special concern”^{ix}, the *uinipeku-matameku* (brook trout), the American eel, whose status is “threatened”^x; and

WHEREAS the *Nitassinan* and the *Mutehekau Shipu / Magpie River* are facing a particular threat of hydroelectric development^{xi}; and

WHEREAS the aforementioned threat may affect various species of flora and fauna, and would thereby limit the exercise of the Aboriginal and treaty rights of the Innu people and the transmission of the Innu culture and way of life to future generations; and

WHEREAS the Bureau d'Audiences Publiques sur l'Environnement (BAPE) has noted that the *Mutehekau Shipu / Magpie River* is of “great interest from an ecological, landscape and recreational tourism standpoint”^{xiii} and recommended the legal protection of the *Mutehekau Shipu (Magpie River)* on several occasions^{xiv}; and

WHEREAS the *Mutehekau Shipu / Magpie River* is the subject of several official resolutions and proposals aimed at its protection and enhancement^{xv}; and

Part 2: The link between the *Mutehekau Shipu / Magpie River* and the Innu of Ekuanitshit

WHEREAS since time immemorial and long before the arrival of Europeans, the Innu people have occupied, managed, used and frequented the *Nitassinan*, of which the *Mutehekau Shipu / Magpie River* is a part, practicing a traditional way of life and surviving on the area's fauna and flora; and

WHEREAS archaeological research carried out in the *Nitassinan* revealed an Indigenous presence dating back to 8,000 years^{xvi} ago and, for at least 3,500 years^{xvii}, the occupation of the entire territory by the ancestors of the Innu on a continuous, regular and exclusive basis^{xviii}; and

WHEREAS the *Mutehekau Shipu / Magpie River* played a historically important role by letting Innu families reach the coast in spring after spending the winter inland of *Nitassinan*^{xix}; and

WHEREAS the *Mutehekau Shipu / Magpie River* is used by Innu families who have established camps there for generations; and

WHEREAS the territory of the *Nitassinan* (including the *Mutehekau Shipu / Magpie River*) represents for the Innu of Ekuanitshit an essential component of their culture, and the Innu conception of the territory implies a fiduciary relationship resembling an ecocentrist vision: the Innu occupy a territory from which they can draw their subsistence and over which they must watch in order to pass it on to the next generation in the same state, one conducive to subsistence activities^{xx}; and

WHEREAS the *Mutehekau Shipu / Magpie River* constituted, constitutes and will constitute an important region for the *Innu Aitun* (the practice of customary, traditional, cultural, social, economic and subsistence activities linked to the land, such as hunting, fishing, trapping and gathering)^{xxi}; and

WHEREAS the Innu of Ekuanitshit rely on the good health of the *Mutehekau Shipu / Magpie River* to fully exercise their ancestral fishing rights, to carry out cultural and spiritual activities^{xxii}, and to enjoy a harmonious relationship with the river; and

WHEREAS fishing for the *ushashameku* (Atlantic salmon) in the *Mutehekau Shipu / Magpie River* is an ancestral activity of the Innu of Ekuanitshit which constitutes an integral part^{xxiii} of the culture and distinctive identity of the Innu of Ekuanitshit to this day^{xxiv}; and

WHEREAS the *ushashameku* occupies a primordial place in Innu culture and spirituality^{xxv}; and

WHEREAS the sharing and redistribution of fishers' catches, in particular to elders in the community, are directly in line with the fundamental traditional values of sharing and mutual aid that characterize Innu society^{xxvi}; and

WHEREAS Innu youth ardently wish to continue to occupy the territory, in particular the *Mutehekau Shipu / Magpie River*, which has become a symbol of the reappropriation of the territory and a symbol of pride for a whole generation^{xxvii}; and

WHEREAS access to the territory and its means of subsistence is considered by the Innu of Ekuanitshit to be the most important element in the Innu way of life, an element whose preservation must be prioritized for the development of the community^{xxviii}; and

WHEREAS the Innu Council of Ekuanitshit has adopted Resolution 671-082, aimed at protecting the *Mutehekau Shipu / Magpie River*, its landscapes and its uses^{xxix}; and

Part 3: The worldwide movement to recognize rivers as entities subject to rights

WHEREAS the recognition of the rights of Nature, in conjunction with the legal tools currently in place, promotes the protection of ecosystems by endowing them with legal personhood; and

WHEREAS a paradigm shift must take place in order to conceive Nature as a legal subject to be respected and preserved for future generations and to the benefit of other species^{xxx}; and

WHEREAS the recognition of the rights of Nature within a context of legal pluralism favours the recognition of Indigenous legal traditions, because the legal norms enshrined by these traditions are based on a symbiotic relationship with the territory; and

WHEREAS the recognition of the rights of Nature ensures respect for both the right to self-determination and the biocultural rights of the Innu First Nation of Ekuanitshit, because the group is interlinked with the territory, waterways and ecosystems which it has protected since time immemorial; and

WHEREAS waterways are essential to all life by supporting a rich diversity of species and ecosystems, supplying wetlands and other aquatic habitats with water, providing vital nutrients to coastal estuaries and oceans, transporting sediment to deltas and fulfilling other essential ecological functions; and

WHEREAS the Quebec state has already recognized in the Civil Code of Quebec the biocentrist approach, in which animals are no longer considered as objects but living beings, endowed with sensibilities and biological imperatives^{xxxi}; and

WHEREAS humans have caused widespread physical changes to rivers through dams and other infrastructures, including the construction of over 57,000 large dams (> 15 m) worldwide, which affect more than two-thirds of all rivers, as well as nearly 17 million reservoirs, resulting in the fragmentation of habitats, reduction of biodiversity, the endangerment of fish populations, the exacerbation of climate change and the retention of sediments and nutrients that are essential for the health of downstream ecosystems^{xxxii}; and

WHEREAS the degradation and exploitation of waterways are not only environmental issues but also right issues for Indigenous peoples and other local communities, because the destruction of rivers threatens the very existence and way of life of those who depend on river systems for their well-being; and

WHEREAS Indigenous communities around the world (including the White Earth Nation of Chippewa, the Yurok Tribe, the Passamaquoddy Tribe, the Nez Percé Tribe and the Menominee Tribe) have taken steps to ensure that both humans and ecosystems enjoy fundamental environmental rights^{xxxiii}; and

WHEREAS municipalities (e.g., Mexico City, Santa Monica, Crestone and San Francisco), provinces (e.g., Victoria, Australia, and Colima, Mexico), countries (e.g., Ecuador, Bolivia and New Zealand) and other jurisdictions around the world have recognized the legal status and rights of Nature^{xxxiv}; and

WHEREAS many international tribunals (e.g., the Inter-American Court of Human Rights) and constitutional courts (e.g., Colombia, Ecuador, India and Bangladesh) have recognized legal personhood in Nature^{xxxv}; and

WHEREAS the Innu of Ekuanitshit deem it urgent to take decisive measures to protect collective rights and rights of future generations by transforming the structures and systems that are at the root of climate change and environmental degradation, in order to ensure a healthy and ecologically balanced environment for the community's survival; and

WHEREAS the Innu of Ekuanitshit wish to ensure a respectful relationship with Nature and emphasize the cultural values associated with it; and

WHEREAS the Innu of Ekuanitshit wish to highlight the congruence between its own legal system and its traditional beliefs, which treat the river as sacred, and to do so, the Innu consider fundamental that the *Mutehekau Shipu / Magpie River* be recognized as a legal subject, the ultimate goal being to ensure that the Innu of Ekuanitshit thrive in harmony with a healthy river; and

WHEREAS the Innu Council of Ekuanitshit recognizes that in order to protect the *Mutehekau Shipu / Magpie River*, its ecosystem, its species and its people, the Innu First Nation of Ekuanitshit must ensure the protection of the *Mutehekau Shipu / Magpie River* by granting it legal personhood and rights; and

Part 4: The legal foundations

WHEREAS biocultural rights, as well as the primordial link between ancestral territory and the vitality of the cultures and traditions of Indigenous peoples have been reaffirmed many times by the jurisprudence of the Supreme Court of Canada^{xxxvi} and by the Inter-American Court of Human Rights^{xxxvii}; and

WHEREAS the Innu of Ekuanitshit are in the midst of a comprehensive land claims treaty process and the *Mutehekau Shipu / Magpie River* is part of their claimed territory^{xxxviii}; and

WHEREAS Canadian courts have recognized that the Innu of Ekuanitshit have strong *prima facie* evidence of land use rights in the *Nitassinan*^{xxxix}; and

WHEREAS the *Quebec Charter of Human Rights* provides that everyone has the right to live in a healthy environment that respects biodiversity^{xl}; and

WHEREAS the *Environment Quality Act* provides that “[e]very person has a right to a healthy environment and to its protection, and to the protection of the living species inhabiting it”^{xli}; and

WHEREAS the *Sustainable Development Act* provides that “[h]uman activities must be respectful of the support capacity of ecosystems and ensure the perennality of ecosystems”^{xlii}; and

WHEREAS the *Act to Affirm the Collective Nature of Water Resources and to Promote Better Governance of Water and Associated Environments* recognizes “impairment of [...] physical, chemical or biological properties, ecological functions or quantitative status” of a water resource as constituting damage^{xliii}; and

WHEREAS the *Natural Heritage Conservation Act* aims to “facilitate the establishment of a network of protected areas representative of biodiversity by introducing conservation measures for natural environments that complete existing measures,”^{xliiv} and the inclusion of the Magpie River in the protected areas register provided for in this law would strengthen recognition of the rights of the river by safeguarding its diversity and its vital components for present and future generations; and

WHEREAS the Innu of Ekuanitshit have the inherent right to self-determination and thus can freely ensure their economic, social and cultural development, as enshrined in international law by Article 3 of the *United Nations Declaration on the Rights of Indigenous Peoples* and recognized by the Government of Canada^{xliv}; and

WHEREAS the Innu of Ekuanitshit have the inherent right to sustainably harvest, in accordance with their customary practices, the flora, fauna and other vital foods and medicines of the territory, as enshrined in international law by Article 26 of the *United Nations Declaration on the Rights of Indigenous Peoples*; and

WHEREAS the Innu of Ekuanitshit have the inherent right to preserve, protect and define the use of the territory, including the *Mutehekau Shipu / Magpie River*, its ecosystem and the species that live there, as enshrined in international law by Articles 29 (1) and 32 (1) of the *United Nations Declaration on the Rights of Indigenous Peoples*; and

WHEREAS the Innu of Ekuanitshit have the inherent right to maintain and strengthen their distinct political, legal, economic, social and cultural institutions, as enshrined in international law by Article 5 of the *United Nations Declaration on the Rights of Indigenous Peoples*; and

WHEREAS the Innu of Ekuanitshit have the inherent right to maintain and strengthen their special spiritual ties to the land, including the *Mutehekau Shipu / Magpie River*, and to assume their responsibilities in this regard to future generations, as enshrined in international law by Article 25 of the *United Nations Declaration on the Rights of Indigenous Peoples*; and

WHEREAS the Innu of Ekuanitshit have the inherent right to promote, develop and maintain their legal systems or customs, as enshrined in international law by Article 34 of the *United Nations Declaration on the Rights of Indigenous Peoples*; and

WHEREAS the Supreme Court of Canada has clearly established that the *Canadian Charter of Rights and Freedoms* is presumed to grant at least as much protection as that afforded by international documents ratified by Canada^{xlvi}; and

WHEREAS Canada is committed to harmonizing its law with the *United Nations Declaration on the Rights of Indigenous Peoples*^{xlvii}; and

WHEREAS the Council of the Innu of Ekuanitshit and the Minganie RCM have reached a mutual agreement on the urgency of declaring the *Mutehekau Shipu / Magpie River* a legal subject in order to better protect it as a living environment; and

For these reasons, the Council of the Innu of Ekuanitshit, under a mutual agreement with the Minganie RCM and by virtue of their powers, which national and international law recognize as self-determination, decides via the present document:

BE IT RESOLVED

THAT for the benefit of its Innu youth and future generations, as well as for the development of traditional, ancestral, cultural and economic activities in accordance with the values and aspirations of its community, the Innu Council of Ekuanitshit recognizes the legal personhood of the *Mutehekau Shipu / Magpie River*; and

THAT the Innu Council of Ekuanitshit declares that as a legal person, the *Mutehekau Shipu / Magpie River* and its watershed have the following fundamental rights, in accordance with the beliefs, customs and practices of the Innu of Ekuanitshit:

- the right to live, to exist and to flow,
- the right to respect for its natural cycles,
- the right to evolve naturally, to be preserved and protected,
- the right to maintain its natural biodiversity,
- the right to fulfill essential functions within its ecosystem,
- the right to maintain its integrity,
- the right to be free from pollution,
- the right to regeneration and restoration,
- the right to take legal action; and

THAT as a living entity possessing fundamental rights, the *Mutehekau Shipu / Magpie River* will be represented by Guardians appointed by the Innu First Nation of Ekuanitshit and the Minganie RCM, with the duty to act on behalf of the rights and interests of the river and to ensure the protection of its fundamental rights; and

THAT the Guardians appointed on both sides will be empowered to take legal action on behalf of the *Mutehekau Shipu / Magpie River*, to claim compensation for damage suffered by the river and to receive compensation for the benefit of the river; and

THAT the best interests of the *Mutehekau Shipu / Magpie River*, as determined by its Guardians, must be taken into account by governments and private entities in all actions or decisions that affect it;

THAT the River Guardians will perform their duties in collaboration with the Planning and Sustainable Development Department of the Minganie RCM, as well as with the Innu Council of Ekuanitshit; and

THAT the Guardians of the Innu Territory of Ekuanitshit Program will ensure participation by Ekuanitshit youth and elders; and

THAT the responsibilities and functions of the Guardians will be aimed at protecting the river's rights and will include, in particular regarding:

- research,

- inventories, surveying and monitoring, the application and compilation of traditional Innu knowledge,
- conservation planning,
- awareness and education,
- species protection, management and recovery,
- reduction of threats to species and their habitat,
- habitat remediation,
- managing habitat to conserve and enhance ecosystem services,
- monitoring and participating in development projects that may affect the river
- welcoming and managing visitors to traditional territories,
- participating in any consultation regarding authorizing projects that may affect the rights of the river, to assert the best interests of the river, as well as its rights,
- maintenance of cultural sites,
- managing government (or other) funding, as well as managing funds recovered in the event of harm done to the *Mutehekau Shipu / Magpie River*, on a fiduciary basis; and

THAT the provisions of this Resolution do not restrict the exercise of Aboriginal and treaty rights or the practice of the *Aitun Innu* by members of the Innu First Nation of Ekuanitshit; and

THAT the participation of the Innu First Nation of Ekuanitshit and the integration of Innu knowledge will be guaranteed when making any decision likely to affect the fundamental rights of the *Mutehekau Shipu / Magpie River*; and

THAT the Council strongly urges all governments to provide prompt and adequate funding to ensure the enjoyment and implementation of the fundamental rights of the *Mutehekau Shipu / Magpie River*; and

THAT the Council will explore the possibility of concluding a co-management agreement recognizing the intrinsic rights of the *Mutehekau Shipu / Magpie River* and guaranteeing joint guardianship of the ecosystem on a nation-to-nation basis (as part of the process of reconciliation and self-government) with other levels of government^{xlviii}; and

THAT the aforementioned intergovernmental co-management agreement will aim to establish an “Indigenous Protected and Conserved Area”^{xlix} surrounding the *Mutehekau Shipu / Magpie River*, reflecting Innu laws and traditions, and ensuring that the Innu of Ekuanitshit can maintain their relationship with their ancestral lands; and

THAT the River Guardians will monitor the protection of the rights of the *Mutehekau Shipu / Magpie River* and ensure permanent stewardship of the aforementioned Indigenous Protected and Conserved Area, in collaboration with the Planning and Sustainable Development Department of the Minganie RCM and the Innu Council of Ekuanitshit.

ⁱ Commission de toponymie du Québec, "Rivière Magpie," online:

<https://toponymie.gouv.qc.ca/ct/ToposWeb/Fiche.aspx?no_seq=38014>. See also: *Audience publique sur le projet d'aménagement hydroélectrique du site du barrage Magpie sur la rivière Magpie*, 2004. *Compte-rendu de la séance de l'après-midi du 22 juin 2004*, Bureau d'Audiences Publiques sur l'Environnement, Part 2, vol. 2.

ⁱⁱ *Résolution 671-082 du Conseil des Innu de Ekuanitshit sur la rivière Magpie*, January 12, 2016.

ⁱⁱⁱ Organisme de bassins versants Duplessis (OBVD), "Portrait du bassin versant Magpie," p. 197, online:

<http://obvd.qc.ca/fiches-portraits/river-magpie/fiche-portrait.pdf>.

^{iv} Its characteristics position it among the most renowned rivers in the world, according to a comparison study carried out by the Laboratoire d'Expertise et de Recherche en Plein Air at the University of Québec in Chicoutimi: Lorie OUELLET, "La rivière Magpie : une rivière de classe mondiale à protéger," *Laboratoire d'Expertise et de Recherche en Plein Air at the University of Quebec in Chicoutimi*, p. 2, online:

https://snapquebec.org/wp-content/uploads/2019/03/Rapport_Magpie_LERPA_SNAP_2013-06.pdf.

^v NATIONAL GEOGRAPHIC, "Top 10 White-Water Rafting," January 21, 2020, online:

<<https://www.nationalgeographic.com/travel/top-10/white-water-rafting>>; MINISTÈRE DE L'ENVIRONNEMENT DU QUÉBEC, "Rapport d'analyse environnementale : Projet d'aménagement hydroélectrique du site du barrage Magpie sur la rivière," February 11, 2005, p. 44.

^{vi} INTERNATIONAL RAFTING FEDERATION, "Top 10 Most Improved Rivers," online:

<<https://www.internationalrafting.com/sustainability/top-10-most-improved-rivers/>>.

^{vii} AVENTURE ÉCOTOURISME QUÉBEC, "Un barrage à l'écotourisme et au tourisme d'aventure – Mémoire sur le projet de centrale hydroélectrique sur la rivière Magpie," June 2004, 6 pp.; MINISTÈRE DE L'ENVIRONNEMENT DU QUÉBEC, "Rapport d'analyse environnementale: Projet d'aménagement hydroélectrique du site du barrage Magpie sur la rivière," February 11, 2005, p. 44.

^{viii} Lorie OUELLET, "La rivière Magpie : une rivière de classe mondiale à protéger," *Laboratoire d'Expertise et de Recherche en Plein Air de l'Université du Québec à Chicoutimi*, p. 2, online: https://snapquebec.org/wp-content/uploads/2019/03/Rapport_Magpie_LERPA_SNAP_2013-06.pdf; Réserve de biodiversité projetée des lacs Belmont et Magpie, Plan de conservation, August 2014, 14 pp., online: <https://www.environnement.gouv.qc.ca/biodiversite/reserves-bio/belmont-magpie/psc-belmont-magpie.pdf>

^{ix} The status of the Atlantic salmon population in the western part of the Côte-Nord (it frequents the mouth of the Mutehekau Shipu / Magpie River), has not yet been classified under the *Species at Risk Act*. However, its status is designated as "special concern" by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC), an independent advisory committee advising the federal minister of Environment and Climate Change. Extensive consultations are currently underway regarding the listing of the species on Schedule 1 of the *Species at Risk Act*. See GOVERNMENT OF CANADA, "Species at risk public registry: Atlantic salmon (*Salmo salar*), Quebec Western North Shore population," 2019, online: <<https://species-registry.canada.ca/index-en.html#/species/1131-779>> (consulted November 30, 2020).

^x The status of the American eel, present in the Mutehekau Shipu River, has not yet been classified under the *Species at Risk Act*. However, its status has been designated as "threatened" by COSEWIC. Extensive consultations are presently underway regarding the listing of the species in Schedule 1 of the *Species at Risk Act*. See GOVERNMENT OF CANADA, "Species at risk public registry: American Eel (*Anguilla rostrata*)," 2019, online: <<https://species-registry.canada.ca/index-en.html#/species/891-632>>.

^{xi} See Clothilde GOUJARD, "Quebec's energy giant casts shadow over Magpie River," *National Observer*, August 18, 2017, online: < <https://www.nationalobserver.com/2017/08/18/news/quebecs-energy-giant-casts-shadow-over-magpie-river> >; and MICHEL CORBEIL, "La Magpie bel et bien dans la mire d'Hydro-Québec," *Le Soleil*, July 31, 2009, online: <<https://www.lesoleil.com/affaires/la-magpie-bel-et-bien-dans-la-mire-dhydro-quebec-f929e546a57afe84e73067849c4b349>>. We should also note the inclusion of the Magpie River in the 2009–2013 Hydro-Quebec Strategic Plan (pp. 22–23), as well as hydroelectric developments such as the Hydroelectric Development Project for the Magpie Dam site (MINISTÈRE DE L'ENVIRONNEMENT DU QUÉBEC, "Rapport d'analyse environnementale : Projet d'aménagement hydroélectrique du site du barrage Magpie sur la rivière," February 11, 2005) and the Romaine River Project (HYDRO-QUÉBEC, "Complexe de la Romaine : Étude de l'impact sur l'environnement," December 2007; VINCENT, Sylvie, 2008 : "Le projet de la rivière Romaine vu et rapporté par la presse écrite." *Recherches amérindiennes au Québec* 38(2–3): 148–152), le Plan Nord (ASSELIN, Hugo, 2011 : "Plan Nord: les Autochtones laissés en plan." *Recherches amérindiennes au Québec* 41(1): 47–64) as well as Hydro-Quebec's 2009–2013 Strategic Plan (<https://www.hydroquebec.com/data/documents-donnees/pdf/plan-strategique-2009-2013.pdf>).

^{xii} Lorie OUELLET, "La rivière Magpie : une rivière de classe mondiale à protéger," *Laboratoire d'Expertise et de Recherche en Plein Air de l'Université du Québec à Chicoutimi*, p. 2, online: https://snapquebec.org/wp-content/uploads/2019/03/Rapport_Magpie_LERPA_SNAP_2013-06.pdf; Réserve de biodiversité projetée des lacs Belmont et Magpie, Plan de conservation, August 2014, 14 pp., online: <https://www.environnement.gouv.qc.ca/biodiversite/reserves-bio/belmont-magpie/psc-belmont-magpie.pdf>.

^{xiii} Bureau d'Audiences Publiques sur l'Environnement (BAPE), *Rapport du BAPE #198 : Projet d'aménagement hydroélectrique du site du barrage Magpie sur la rivière Magpie*, August 2004, p. 2.

^{xiv} Bureau d'Audiences Publiques sur l'Environnement (BAPE), *Rapport du BAPE #236 : Projets de réserves de biodiversité du massif des lacs Belmont, Magpie, buttes lac Sauterelles, basses collines lac Guernesé et collines Brador*, February 2007, p. 24: "Given the uniqueness of the Magpie River, the commission is of the opinion that it should be excluded from new hydroelectric development and should benefit from protected status to preserve its natural character and recreational tourism potential. [trans.];" see also Bureau d'Audiences Publiques sur l'Environnement (BAPE), *Rapport du BAPE #198 : Projet d'aménagement hydroélectrique du site du barrage Magpie sur la rivière Magpie*, August 2004, p. 2: "the upper section of the Magpie River between Lake Magpie and the third falls and its rapids should be legally protected...[trans.];" see also *Rapport du BAPE #256 Projet d'aménagement d'un complexe hydroélectrique sur la rivière Romaine*, February 2009, p. 193: "Considering that the Romaine River's flowing waters possess qualities of undeniable value that contribute to the landscape and the recreational culture of the rivers of the Côte-Nord, the commission of inquiry is of the opinion that, if the project is carried out, it would be necessary to protect a Côte-Nord river of similar size, aesthetic and recreational qualities, as determined by recognized criteria in this area. [trans.]" According to the following study: *La rivière Magpie: une rivière de classe mondiale à protéger*, Laboratoire d'Expertise et de Recherche en Plein Air de l'Université du Québec à Chicoutimi, p. 74: "This study has clearly demonstrated that the sole river having recreational potential similar to the Romaine River is the Magpie." [trans.]

^{xv} In 2015, the Conférence régionale des Élus (CRÉ) [Regional Conference of Elected Officials] in the Côte-Nord proposed a study zone (ZE-E006) of 2630 km² to protect the Magpie River (Résolution CA-P20150129-12). This proposal was reaffirmed when the Minganie RMC passed Resolutions 207-14 and 229-18.

^{xvi} OUELLET, J.-C., and P.J.H. RICHARD, 2017: "Un archaïque ancien (8500-8000 ans AA) en Moyenne-Côte-Nord: l'apport des sites EbCx-65 et EbCx-66 en Minganie," in A.L. Burke and C. Chapdelaine (eds.), *L'Archaïque au Québec: six millénaires d'histoire amérindienne*: 15–56. *Paléo-Québec* 36, Recherches amérindiennes au Québec, Montreal; PINTAL, J.-Y., 1998: *Aux frontières de la mer: La préhistoire de Blanc-Sablon*. Collection Patrimoines, Dossier 102, Gouvernement du Québec, Québec; PINTAL, J.-Y., 2000: "La préhistoire de la région de Baie-Corneau et l'exploitation des ressources du littoral." *Archéologiques* 14: 1–10; PLOURDE, Michel, 2003: *8000 ans de Paléohistoire. Synthèse des recherches archéologiques menées dans l'aire de coordination du Parc Marin du Saguenay–Saint-Laurent*. Cultural Heritage Service, Parks Canada. Quebec.

^{xvii} HOLLY, Donald H., 2013: *History in the making: The archaeology of the Eastern Subarctic*. Altamira Press, London; CHEVRIER, Daniel, 1996: "Les premières populations humaines: 8500 à 2000 ans avant aujourd'hui," in Pierre Frenette (ed.), *Histoire de la Côte-Nord*: 73–104. Institut de recherche sur la culture, Presses de l'Université Laval, Québec.

^{xviii} Note: the term "exclusive" does not always mean occupation to the exclusion of all others: exclusivity may be "shared."

^{xix} INNU COUNCIL OF EKUANITSHIT, *Mémoire sur le projet d'aménagement hydroélectrique du site du barrage Magpie sur la rivière Magpie*, submitted to BAPE, 2004, p. 4; MINISTÈRE DE L'ENVIRONNEMENT DU QUÉBEC, "Rapport d'analyse environnementale : Projet d'aménagement hydroélectrique du site du barrage Magpie sur la rivière," February 11, 2005, pp. 47–48.

^{xx} HYDRO-QUÉBEC, *Complexe de la Romaine : Étude de l'impact sur l'environnement*, vol. 6, ch. 39, December 2007, p. 39–47. "The Innu speak sometimes, in French, of their sense of belonging to the land. They thus conceive of themselves as being a component of the land. [trans.]" (p. 39–47). In their view, the Innu belong to this land, they have been its guardians since time immemorial. For the Innu, the land can no more be owned than one can own one's own mother. [trans.]" See also Jean Paul Lacasse, *Les Innus et le territoire (Innu tipenitamun)*, Collection territoires Septentrion, 2004.

^{xxi} MINISTÈRE DE L'ENVIRONNEMENT DU QUÉBEC, "Rapport d'analyse environnementale: Projet d'aménagement hydroélectrique du site du barrage Magpie sur la rivière," February 11, 2005, pp. 47–48.

^{xxii} CPAWS-QUEBEC, "Le lien entre les Innus et Mutehekau Shipu et le Nutshimit," 2020, p. 3: "The water that flows in the river is like that of the umbilical cord that links mother and child: it must be protected if we want to see life continue to flourish. Our identity, our culture, our language, our spirituality, our very existence are interwoven with the health of our Mother Earth. [trans.]"

^{xxiii} See Pierre Verreault, et al., *Pêches des communautés Innues de la Côte-Nord: Étude de cas à dimension multiple*, AMIK, Octobre 2013, pp. 10–14, online: <https://scienzepolitiche.unical.it/bacheca/archivio/materiale/1157/DIRITTO%20COMPARATO%20DEI%20BENI%20CUMUNI/ECADIM%20CANADA%20PERCHE%20COMM.%20INNUES%20COTE-NORD.pdf>; Agence Mamu Innu Kaikus (AMIK), "Ekuanitshit : Portrait-diagnostic de la pêche et du saumon atlantique," 2013, pp. 4–6, 12; HYDRO-QUÉBEC, *Complexe de la Romaine : Étude de l'impact sur l'environnement*, vol. 6, ch. 39, December 2007, p. 39–84.

- ^{xxiv} HYDRO-QUÉBEC, *Complexe de la Romaine : Étude de l'impact sur l'environnement*, vol. 6, ch. 39, December 2007, p. 39–86, 39–95: Salmon fishing is an important social activity and represents a central dimension of Innu culture. Salmon fishing is also widely practiced and is a point of connection between members of the Innu Nation and the land.
- ^{xxv} According to Innu spirituality, every form of life has its master. For the salmon, this master is “Mesnak.” Respect for salmon is thus linked to respect for Mesnak, who provides the salmon to the Innu: Agence Mamu Innu Kaikus (AMIK), “Nutashkuan : Portrait-diagnostic de la pêche et du saumon atlantique,” 2013, p. 4; see also HYDRO-QUÉBEC, *Complexe de la Romaine : Étude de l'impact sur l'environnement*, vol. 6, ch. 39, December 2007, p. 39–95: “Atlantic salmon fishing as practiced by the Innu has a strong social character as well as a profound cultural dimension. Seldom does an Innu fish alone for salmon. The activity is carried out in groups of at least two fishers, and sometimes several boats constitute a single expedition. Thus, fishing often becomes an occasion to see friends and relatives. It is usually a time of conviviality, where interpersonal and community bonds are formed and reinforced. [trans.]”
- ^{xxvi} HYDRO-QUÉBEC, *Complexe de la Romaine : Étude de l'impact sur l'environnement*, vol. 6, ch. 39, December 2007, p. 39–95.
- ^{xxvii} *Résolution 671-082 du Conseil des Innu de Ekuanitshit sur la rivière Magpie*, January 12, 2016.
- ^{xxviii} Survey carried out by Hydro-Québec for the report, HYDRO-QUÉBEC, *Complexe de la Romaine : Étude de l'impact sur l'environnement*, vol. 6, ch. 39, December 2007, p. 39–9.
- ^{xxix} *Résolution 671-082 du Conseil des Innu de Ekuanitshit sur la rivière Magpie*, January 12, 2016.
- ^{xxx} See Christopher D. STONE, *Should Trees Have Standing? Toward Legal Rights for Natural Objects*, Los Altos, Calif: W. Kaufmann, 1974; David BOYD, *The Rights of Nature: A Legal Revolution That Could Save the World*, Toronto: ECW Press, 2017.
- ^{xxxi} Civil Code of Quebec, art. 898.1; See also this recent judgment of the Superior Court of Quebec (emphasis added): Walsh c. Dandurand, 2019 QCCS 1403 (CanLII), <http://canlii.ca/t/hztk2>. “[110] While the animal was previously considered to be personal property that could not be assessed except as an inanimate object, the Court is of the opinion that the way that the loss of an animal is assessed must be reviewed. [111] The animal now finds itself in a new, unnamed category, though the provisions of the Civil Code relating to property are nevertheless applicable to it, including those related to material damage. [112] If the animal is not a ‘simple good’ and is instead a being endowed with sensibility, this means that its owner or possessor can claim a sui generis relationship with the animal. The loss of this relationship, particularly in the case of a companion animal, can cause compensable damage to an owner and to his or her relatives, even if, by definition, the loss is non-pecuniary and difficult to quantify. This is, however, not a reason to not indemnify it or minimize it.” [trans.]
- ^{xxxii} Universal Declaration of the Rights of Rivers, online: <<https://www.earthlawcenter.org/river-rights>>; see also: IPBES (2019): Summary for policymakers of the global assessment report on biodiversity and ecosystem services of the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services. S. Díaz, J. Settele, E. S. Brondizio, H. T. Ngo, M. Guèze, J. Agard, A. Arneth, P. Balvanera, K. A. Brauman, S. H. M. Butchart, K. M. A. Chan, L. A. Garibaldi, K. Ichii, J. Liu, S. M. Subramanian, G. F. Midgley, P. Miloslavich, Z. Molnár, D. Obura, A. Pfaff, S. Polasky, A. Purvis, J. Razzaque, B. Reyers, R. Roy Chowdhury, Y. J. Shin, I. J. Visseren-Hamakers, K. J. Willis, and C. N. Zayas (eds.). IPBES secretariat, Bonn, Germany. 56 pp. <https://doi.org/10.5281/zenodo.3553579>.
- ^{xxxiii} Including: Ponca Nation (2018), online: <http://therightsofnature.org/ponca-rights-of-nature>; Ho-chunk Nation Constitution (2018), online: <https://celdf.org/2018/09/press-release-ho-chunk-nation-general-council-approves-rights-of-nature-constitutional-amendment/>; the White Earth Nation of Chippewa, Resolution 001-19-009 and Resolution 001-19-010 on the rights of Manoomin (2018); Yurok Tribal Council, Resolution 19-40, *Resolution Establishing the Rights of the Klamath River* (2019); Joint Tribal Council of the Passamaquoddy Tribe, *St. Croix River and Alewife Resolution* (2012); Nez Percé Tribe, *Resolution SPGC20-02 on Snake River* (2020); Menominee Indian Tribe of Wisconsin, *Resolution no. 19-52: Recognition of the Rights of the Menominee River* (2020).
- ^{xxxiv} See the Constitution of Ecuador (2008), art. 10, 71, 72, 73 and 74; *Bolivian framework law (071) on the Rights of Mother Earth* (2010); *Bolivian framework-law (300) regarding Mother Earth and development for well-being* (2012); *Te Awa Tupua (Whanganui River Claims Settlement) Act* (2017), New Zealand; *Yarra River Protection Act* (2017), Victoria, Australia; Constitution of Mexico City, art. 18 (2018); Constitution of the State of Colima, Mexico (2019); Ordinance 2013-01 of Mora County, New Mexico (2013); *Ordinance of the City Council of the City of Santa Monica Establishing Sustainability Rights*, Santa Monica, California (2013); Resolution 006-2018, Crestone, Colorado (2018); *Resolution 397-14 on the rights of whales and dolphins*, San Francisco, California (2014); Republic of Uganda, National Environment Act, 2019, art. 4.
- ^{xxxv} In *Advisory Opinion OC-23/17*, issued in November 2017, the Inter-American Court of Human Rights emphasized that, as an autonomous law, environmental law protects the environment as a legal interest in its own right, independent of any benefit it may provide humanity: “as an autonomous right, the right to a healthy environment, unlike other rights, protects the components of the environment, such as forests, rivers and seas, as legal interests in themselves, even in the absence of the certainty or evidence of a risk to individuals. This means that it protects nature and the environment, not only because of the benefits they provide to humanity or the effects that their degradation may have on other human rights, such as health, life or personal integrity, but because of their importance to the other living organisms with which we share the planet that also merit protection in their own right.” (par. 62) In this perspective, the Court noted a tendency in the judgments of constitutional courts of many countries and in their Constitutions to recognize nature’s legal personhood (par. 62). See the following judgments: Constitutional Court of Columbia, judgment no. T-622-16 of November 10, 2016, paragraphs 9.27–9.3; Constitutional Court of Ecuador, judgment no. 218-15-SEP-CC of July 9, 2015, pp. 9–10; High Court of Uttarakhand at

Naintal, India, *Lalit Miglani v. State of Uttarakhand and Others*, March 30, 2017, pp. 61–63; High Court Division of the Supreme Court of Bangladesh, *Peace for Bangladesh v. Bangladesh and others* (2019), confirmed by the Appellate Division of the Supreme Court of Bangladesh in 2020.

^{xxxvi} In *Tsilhqot'in Nation v. British Columbia*, 2014 SCC 44, the Supreme Court recognized the connection between the land and the survival of Indigenous cultures (see paras. 74, 84 and 86). In paragraph 86, it precisely specified that in the case of an ancestral title, the fiduciary obligation incumbent on the State in justifying an infringement of the latter also implies a consideration of future generations: “the government must act in a way that respects the fact that Aboriginal title is a group interest that inheres in present and future generations. [...] Incursions on Aboriginal title cannot be justified if they would substantially deprive future generations of the benefit of the land.”

In *Delgamuukw v. British Columbia*, [1997] 3 SCR 1010, the Supreme Court established a link between the second branch of the source of aboriginal title, namely Aboriginal perspectives including Aboriginal legal systems, and the need to maintain the relationship between an Indigenous community and its lands (para. 127). According to the Court, the preservation of Indigenous cultures could be compromised if Indigenous lands are used in a manner that does not respect the special relationships between Indigenous peoples and their lands (para. 127). Justice Lamer noted that if the occupation necessary to establish Aboriginal title has been proven, “there will exist a special bond between the group and the land in question such that the land will be part of the definition of the group’s distinctive culture.” (para. 128)

^{xxxvii} In the case of the *Yakye Axa Indigenous Community v. Paraguay* (2005), the Inter-American Court of Human Rights reaffirms the important link between ancestral territory and the vitality of cultures and traditions of Indigenous peoples. The Court emphasizes that the close relationship of Indigenous peoples with their lands must be recognized and understood as the cornerstone of their culture, spiritual life, wholeness, economic survival, preservation and transmission to future generations: “[T]he close relationship of Indigenous peoples with the land must be acknowledged and understood as the fundamental basis for their culture, spiritual life, wholeness, economic survival, and preservation and transmission to future generations.” (para. 131) In addition, the Court elaborates on the primordial link between the territory and the Indigenous peoples by declaring that ancestral Indigenous territories are part of their conception of the world, of their religiosity, and therefore of their cultural identity: “The culture of the members of the Indigenous communities directly relates to a specific way of being, seeing, and acting in the world, developed on the basis of their close relationship with their traditional territories and the resources therein, not only because they are their main means of subsistence, but also because they are part of their worldview, their religiosity, and therefore, their cultural identity.” (para. 135). In the light of these findings, the Court underlines that the realization of the right to collective property in the Indigenous context requires taking into account the special relationship that Indigenous populations maintain with their ancestral lands and the role that their territories play in maintaining their cultural identities (paras. 137 and 154).

In *Sawhoyamaya Indigenous Community v. Paraguay* (2006), the Inter-American Court of Human Rights details the relationship between territories and Indigenous cultures. The Court emphasizes that the spiritual and material foundation of Indigenous identity is primarily supported by their unique relationship with their traditional lands. According to the Court, as long as this relationship exists, the right to claim land remains enforceable. The unique relationship of Indigenous peoples with their traditional lands can be expressed in different ways and may include traditional use or traditional presence through spiritual or ceremonial ties; settlements or sporadic agriculture; seasonal or nomadic gathering; hunting and fishing; the use of natural resources associated with their customs and any other element characterizing their culture: “the spiritual and material basis for Indigenous identity is mainly supported by their unique relationship with their traditional lands. As long as said relationship exists, the right to claim lands is enforceable.” (paras. 131–132)

In *Advisory Opinion OC-23/17*, issued in November 2017, the Inter-American Court of Human Rights addresses the link between human rights, the environment and the biocultural rights of Indigenous peoples in paragraphs 48, 113, 138, 152, 156, 164, 166 and 169. The Court recognized that the maintenance of a healthy environment is essential to the protection of Indigenous land rights (para. 48). In addition, the Court affirms that the lack of access of Indigenous peoples to their territories and natural resources can place them in situations of extreme neglect that can lead to violations of their human rights in addition to causing them suffering and threatening their culture: “[T]hese peoples’ right to collective ownership is linked to the protection of, and access to, the resources to be found in their territories, because those natural resources are necessary for the very survival, development and continuity of their way of life. The Court has also recognized the close links that exist between the right to a dignified life and the protection of ancestral territory and natural resources. In this regard, the Court has determined that, because Indigenous and tribal peoples are in a situation of special vulnerability, States must take positive measures to ensure that the members of these peoples have access to a dignified life – which includes the protection of their close relationship with the land – and to their life project, in both its individual and collective dimension.” (para. 48) The Court also affirmed that States have an obligation to protect the ancestral territories of Indigenous peoples because of the relationship that these lands have with their cultural identity: “[I]n the specific case of indigenous and tribal communities, the Court has ruled on the obligation to protect their ancestral territories owing to the relationship that such lands have with their cultural identity, a fundamental human right of a collective nature that must be respected in a multicultural, pluralist and democratic society.” (para. 113)

^{xxxviii} *Mémoire du Conseil des Innue de Ekuanitshit, Projet Hydroélectrique du complexe de la Romaine*, 2008, Section II, 19 pp. <https://archives.bape.gouv.gc.ca/sections/mandats/La%20Romaine/documents/DM74.pdf>

^{xxxix} See *Innu Council of Ekuanitshit v. Canada (Attorney General)*, 2014 FCA 189, where the Federal Court of Appeal notes that the Innu of Ekuanitshit have strong *prima facie* evidence of land use rights in their traditional territory (para. 90). The Court also recognizes that the ancestral land rights of the Innu of Ekuanitshit are vulnerable and liable to be violated, and notes that commercial activities constitute a serious risk to the enjoyment of the Innu of Ekuanitshit’s land rights (para. 90). See also *Innu Council of Ekuanitshit v. Canada (Attorney General)*, 2013 FC 418, at paras. 103–104.

^{xi} *Charter of Human Rights and Freedoms*, CQLR c. C-12, art. 46.1: “Every person has a right to live in a healthful environment in which biodiversity is preserved, to the extent and according to the standards provided by law.”

^{xli} *Environment Quality Act*, art. 19.1.

^{xlii} *Sustainable Development Act*, art. 6(m).

^{xliii} *Act to Affirm the Collective Nature of Water Resources and to Promote Better Governance of Water and Associated Environments*, art. 8.

^{xliiv} *Natural Heritage Conservation Act*, art. 1 and art. 5.

^{xliv} See: The Government of Canada’s Approach to Implementation of the Inherent Right and the Negotiation of Aboriginal Self-Government,” available online at: <https://www.rcaanc-cirnac.gc.ca/eng/1100100031843/1539869205136>.

^{xlvi} “[30] The guidance provided by Chief Justice Dickson in *Re PSERA* is a useful starting point. Although set out in a dissenting opinion, its approach to international and comparative law has since shaped the way this Court treats these sources. In considering the scope of s. 2(d) of the Charter, he first considered Canadian jurisprudence and that of the Privy Council, then United States law and international law (p. 335). Regarding international sources in particular, he gave the following explanations:

“The various sources of international human rights law – declarations, covenants, conventions, judicial and quasi-judicial decisions of international tribunals, and customary rules – must in my opinion be regarded as relevant and persuasive sources for interpretation of the Charter provisions.

“In particular, the similarity between the policies and provisions of the Charter and those of international human rights documents attaches considerable relevance to the interpretation of those documents by adjudicative bodies, in much the same way that decisions of the United States courts under the Bill of Rights or decisions of the courts of other jurisdictions are relevant and may be persuasive. The relevance of these documents in Charter interpretation extends beyond the standards developed by adjudicative bodies under the documents to the documents themselves.” [Emphasis added; p. 348–349.]

[31] Dickson C.J. went on to clarify that these sources do not all carry the same weight in interpreting the Charter, stating “I believe that the Charter should generally be presumed to provide protection at least as great as that afforded by similar provisions in international human rights documents which Canada has ratified”: p. 349 (emphasis added) This proposition has since become a firmly established principle in the interpretation of the Charter, namely the presumption of conformity: *Ktunaxa Nation v. British Columbia (Forests, Lands and Natural Resource Operations)*, 2017 SCC 54, [2017] 2 SCR 386, at para. 65; *India v. Badesha*, 2017 SCC 44, [2017] 2 SCR 127, at para. 38; *Saskatchewan Federation of Labour v. Saskatchewan*, 2015 SCC 4, [2015] 1 SCR 245, at para. 64; Kazemi, at para. 150; *Divito v. Canada (Public Safety and Emergency Preparedness)*, 2013 SCC 47, [2013] 3 SCR 157, at para. 23; *Health Services and Support – Facilities Subsector Bargaining Assn. v. British Columbia*, 2007 SCC 27, [2007] 2 SCR 391, at para. 70.

^{xlvii} “In November 2015, the Prime Minister of Canada called on the Minister of Indigenous and Northern Affairs and other ministers, in their mandate letters, to implement the declaration. In May 2016, the Minister of Indigenous and Northern Affairs announced that Canada now fully and wholeheartedly supported the declaration.”: INDIGENOUS AND NORTHERN AFFAIRS CANADA, “United Nations Declaration on the Rights of Indigenous Peoples,” 2017, online: LINK TO FRENCH VERSION ONLY <https://www.aadnc-aandc.gc.ca/fra/1309374407406/1309374458958>.

^{xlviii} Relationships with federal and provincial governments or agencies can be formalized in higher-level agreements (e.g., government-to-government agreements, treaties or settlement agreements, shared decision-making agreements, etc.) or in plans and operational protocols related to stewardship and resource management (e.g., land use plans, wildlife management plans, park management plans, and species recovery plans). For example, see the 8 intergovernmental co-management agreements concluded in 2019 as part of the creation of the Thaidene Nënë Indigenous Protected and Conserved Area, one of the largest protected areas in Canada. Located in the Northwest Territories, parts of Thaidene Nënë are also designated as a national park, territorial park, and wildlife conservation area. The entire territory will be co-managed by the Łutsël K’é Dene First Nation under the Guardians of the NiHat’ni Dene Program: *Agreement for the Creation of a National Park between the Government of Canada and the Dene First Nation of Łutsël K’é*, *Agreement for the Creation of a National Park between the Government of the Northwest Territories and the Łutsël K’é Dene First Nation* (online: https://www.enr.gov.nt.ca/sites/enr/files/resources/tdn_-_lkdfn_agreement_final_signed.pdf, *Impact and Benefit Agreement between the Government of Canada and the Northwest Territory Métis Nation*, *Agreement for the Creation of a Park between the Government of the Northwest Territories and the Métis Nation of the Northwest Territories*, *Memorandum of Agreement for Thaidene Nene National Park Reserve of Canada between Her Majesty in Right of Canada and the Government of the Northwest Territories* (also known as the Land Transfer Agreement), *Denesolitiné, an Agreement between the Parks Canada Agency and the Deninu K’ue First Nation*, *Agreement for the Creation of a National Park between the Government of the Northwest Territories and Deninu K’ue First Nation*, *Agreement in Principle between the Government of Canada and the Yellowknives Dene First Nation*.

^{xlix} Indigenous Protected and Conserved Areas reflect Indigenous laws and traditions and ensure that Indigenous peoples can maintain their relationship with their ancestral lands. They are often created in partnership with federal and/or provincial governments, and some may be designated as Aboriginal parks, national or provincial parks, or national wildlife areas. Indigenous governments play the primary role in identifying and managing these areas. Indigenous Guardians provide ongoing management and stewardship of Indigenous Protected and Conserved Areas. The Indigenous protected and conserved area is explained and highlighted in the following report: *We rise together. Achieving Pathway to Canada Target 1 by creating Indigenous Protected and Conserved Areas in the spirit and practice of reconciliation*, Indigenous Circle of

Experts, Report and Recommendation, March 2018. See, for example, the Thaidene Néné Indigenous Protected and Conserved Area created by the Łutsël K'é Dene First Nation, one of the largest protected areas in Canada. Located in the Northwest Territories, parts of Thaidene Néné are also designated as a national park, territorial park, and wildlife conservation area. The entire territory will be co-managed by the Lutsel K'e Dene First Nation under the NiHat'ni Dene Guardians program. This conservation project recently won the United Nations Ecuador International Prize: DANIELLE D'ENTREMONT, "Łutsël K'é Dene First Nation wins international prize from United Nations," CBC News, June 6, 2020, online: <<https://www.cbc.ca/news/canada/north/lutsel-ke-dene-first-nation-united-nations-prize-thaidene-nene-1.5601863>> See also DAVID SUZUKI FOUNDATION, *Tribal Parks and Indigenous Protected and Conserved Areas Lessons Learned from B.C. Examples*, 2018, 56 pp., online: <<https://davidsuzuki.org/wp-content/uploads/2018/08/tribal-parks-indigenous-protected-conserved-areas-lessons-b-c-examples.pdf>>.