



**Environmental and Social Impact
Assessment for the Troilus Mine Project**

COMPENSATION PLAN

Environmental and Social Impact Assessment for the Troilus Mine Project

COMPENSATION PLAN

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Acronyms / abbreviations

COSEWIC	Committee of the Status of Endangered Wildlife in Canada
CPAWS Quebec	Canadian Parks and Wilderness Society for Nature and Parks
CREDD	Conseil régional de l'environnement et du développement durable
DFO	Department of Fisheries and Oceans Canada
ESIA	Environmental and Social Impact Assessment
GNC	Cree Nation Government
HADD	Harmful Alteration, Disruption and Destruction
LQE	Loi sur la qualité de l'environnement (Environment Quality Act)
MELCCFP	Ministère de l'Environnement, de la Lutte contre les changements climatiques et, de la Faune et des Parcs (Ministry of Environment, the Fight Against Climate Change, Wildlife and Parks)
MERIP	Multidimensional Ecological Richness Index for Peatlands
MRNF	Ministère des Ressources naturelles et des Forêts (Ministry of Natural Resources and Forestry)
RCAMHH	Règlement sur la compensation pour l'atteinte aux milieux humides et hydriques (Regulation respecting compensation for adverse effects on wetlands and bodies of water)
SNAP	Society for Nature and Parks
UQAT	Université du Québec en Abitibi-Témiscamingue

26. Offsetting Plan

26.1 Wetland Compensation Project

Troilus Gold Corp (Troilus) applied the "avoid-minimize-compensate" mitigation approach when developing its mining project. This approach, set out in section 46.0.1 of the Environment Quality Act (LQE), gives priority to avoiding wetland and bodies of water loss as early as possible in project design, or to reducing impacts on the receiving environment. Ultimately, residual losses must be compensated for, in order to offset the loss of functionality caused by the impact on the target environment.

In order to compensate for the unavoidable losses of wetlands that will be caused by the development of the mining project's infrastructures (surface area evaluated at 339.13 hectares), Troilus must propose one or more compensation projects.

Wetland compensation measures for development activities have been developed in the context of southern Quebec, where wetlands are limited in number and distribution. However, Nord-du-Québec region differs from southern Quebec in terms of wetland scarcity. In fact, wetlands in Eeyou Istchee Baie-James are more abundant than in southern Quebec. As such, proposed wetland compensation projects in this region do not necessarily involve the creation of new wetlands.

The requirement for wetland and bodies of water compensation is set out in section 46.0.5 of the LQE. The compensation projects presented below are preliminary proposals that will need to be approved by the Ministry of Environment, the Fight Against Climate Change, Wildlife and Parks (MELCCFP) and further developed if they are deemed to comply with the Regulation respecting compensation for adverse effects on wetlands and bodies of water (RCAMHH).

26.1.1 Proposed Projects

Instead of presenting project(s) involving the creation or restoration of wetlands in the region, Troilus suggests another type of project. Since the area near the project site is a preferred habitat for Woodland Caribou, Troilus would like to propose a project that would benefit this species of special concern by closing a certain area of old forest roads no longer used by the forest industry. Boreal populations of Woodland Caribou (*Rangifer tarandus*) are designated threatened under the Species at Risk Act in Canada (S.C. 2002, c. 29) and vulnerable under the Act respecting the conservation and development of wildlife (RLRQ c E-12.01 r2). These populations are in decline across almost the entire range of the species in the country (Committee on the Status of Endangered Wildlife in Canada [COSEWIC], 2016).

Other avenues for wetland compensation are also proposed but will require further analysis soon. These include the following projects:

- Participation in efforts to restore the recently collapsed lac à L'Eau Rouge.
- Rehabilitation of contaminated sites under government responsibility.

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These two recently identified projects will require further consultation and analysis before more concrete proposals can be developed. However, they are mentioned here because Troilus Gold intends to pursue their development. The rehabilitation of contaminated sites located close to fish habitat may, where appropriate, be integrated into compensation projects aimed at preserving or restoring these habitats.

26.1.2 Impact of Forest Roads on Caribou Populations

Forestry and mining activities open up access to the territory by creating roads. However, it is recognized that good management practices require the closure of forest roads to as soon as the operations are completed. This practice promotes biodiversity and is particularly important for the conservation of the woodland caribou ecosystem (St-Laurent, 2007). In Quebec, however, forestry and mining companies are not required by law to dismantle the roads they built. It is therefore common practice to leave forest roads in place after operations have ceased, due to the high cost of dismantling them. Abandoning a forest road can have several consequences for land use, the forest ecosystem and wetlands.

At the ecosystem level, the construction of forest roads leads to territory fragmentation and alter the natural environment (Benoit-Pépin, 2023). Areas where forest roads remain in place are vulnerable zones for caribou, since predators such as wolves (*Canis lupus*) and black bears (*Ursus americanus*), which hunt fawns, travel there much more easily. Forest roads can have a knock-on impact up to 2 km from the road on the potential occurrence of Woodland Caribou (Rudolph et al., 2012).

26.1.3 Target Area for Work

The area affected by the road closure operations was previously logged by Chantier Chibougamau and includes just over 300 linear km of forest roads. The harvested area is regulated by Interim Measures for Woodland Caribou (*Rangifer tarandus*). Troilus has already begun characterizing some of these concerned forest roads. These forest roads were characterized by kilometer 78 of the Route du Nord, northwest of the Cree community of Mistissini (Figure 26.1). Troilus does not necessarily intend to proceed with the decommissioning of all these characterized roads but plans to target those whose closure would be advantageous for the protection of caribou. Other areas could also be characterized if the project moves forward.

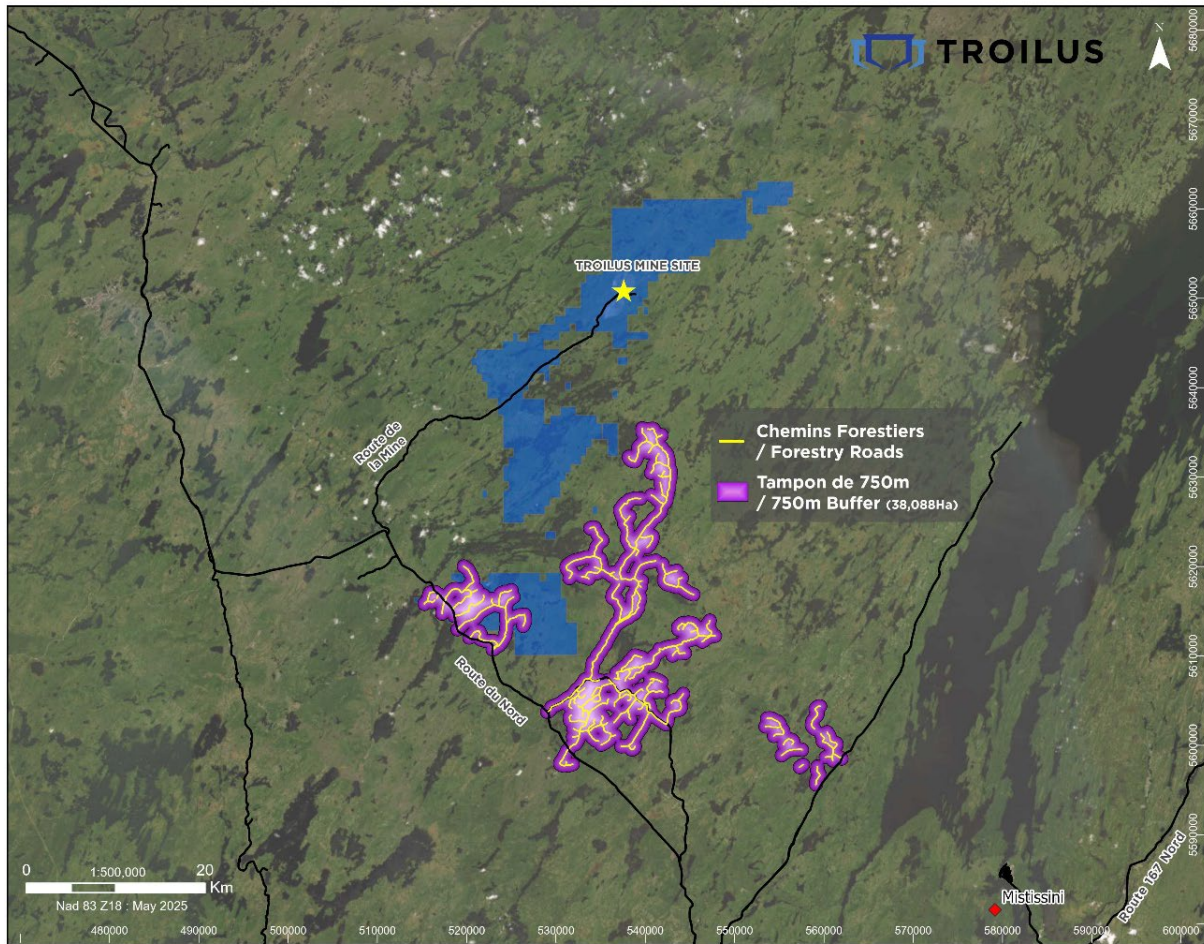


Figure 26.1 Forest Roads Identified by Troilus

26.1.4 Vegetation on Forest Roads

Lacerte (2021) presents various methods for forest roads rehabilitation in Quebec's boreal forest. The study was conducted in the traditional Innu territory of the Essipit community, northwest of the Saguenay Fjord in Quebec. The site studied by Lacerte (2021) is comparable to the one targeted by Troilus for forest road decommissioning. The results of the study can then be used to develop a management plan for the project.

Lacerte's thesis (2021) proposes several types of methods used to dismantle forest roads. An effective method for carrying out the decommissioning process must enable the creation of preferred woodland caribou habitat as quickly as possible, to protect the species from the vulnerabilities created by fragmentation of the territory.

Furthermore, this study shows that the best way to promote caribou habitat is to begin by closing the road to land users access, then decompacting the soil and planting with native conifer species such as black spruce (*Picea mariana*) and/or jack pine (*Pinus banksiana*).

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Of course, for revegetation to serve as an effective compensation measure for this project, the Interim Measures for Woodland Caribou will have to be applied by the ministry responsible to ensure that no other forestry company operates in the target area.

26.1.5 Culvert Removal and Soil Decompaction

The decommissioning of forest roads would also include removal of culverts that have been installed in watercourses along these roads. When a forest road is no longer used by its operator, maintenance is no longer assured. Culverts are frequently crushed or obstructed by organic debris, beaver dams and collapsed granular layers, all of which find their way into downstream watercourses and wetlands.

By decommissioning forest roads that are no longer used by the forest industry, culverts would be removed thereby restoring the free flow of water and fish passage. Natural soil drainage would also be re-established by decompacting the layers of granular material placed and compacted during road construction. These elements would contribute to the restoration of wetlands that were disturbed during road construction.

26.1.6 Search for Compensation Projects in Collaboration with Stakeholders

Troilus consulted project stakeholders regarding the identification of compensation projects for aquatic fauna and/or wetlands. The table below summarizes the contacts established with these stakeholders.

Table 26.1 Contacts established with stakeholders

Stakeholder Consulted	Communication Method	Date of Contact
Mistissini Cree Community	E-mail	November 2024
Nibiischii Corporation	E-mail and meeting	October 2024
Eeyou Istchee James Bay	Email	November 2024
Cree Nation Government (CNG)	Email	January 2025
James Bay Eeyou Istchee Regional Government	Email	June 2025
MELCCFP - Direction de la gestion de la faune du Nord-du-Québec	E-mail and meeting	January 2025
Ministère des Ressources naturelles et des Forêts (MRNF) - Direction du développement et du contrôle de l'activité minière	E-mail	October 2024
MRNF (Direction de la Restauration des sites miniers)	E-mail	February 2025
Land users	Meeting and workshops	October-November 2024
City of Chapais	Email	November 2024
City of Chibougamau	Email	November 2024

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26.1.7 Participation in a Research Project

In addition to forest road decommissioning, Troilus has identified a research project aimed at supporting the objectives of wetland compensation plans:

- Digital Identification Tool: Multidimensional Ecological Richness Index for Peatlands (MERIP).

Troilus has established contacts with researchers involved in various projects, who have expressed interest in possible collaboration, subject to the acceptance of the research projects as eligible compensation projects.

The Multidimensional Ecological Richness Index for Peatland (MERIP) is a pioneering initiative designed to address urgent socio-ecological challenges by combining scientific research, community engagement and indigenous knowledge.

The project to develop the MERIP digital tool, launched a few years ago, still requires further work to optimize its indices according to the regions of use. The Troilus mine site is located in an area where no data has yet been collected for the development of this tool. Consequently, Troilus aims to validate the accuracy of MERIP, developed by the Université du Québec en Abitibi-Témiscamingue (UQAT), and to enhance its databases with information collected in the study area.

26.2 Preliminary Offsetting Plan for Loss of Fish Habitat

The Troilus project was designed to minimize impacts on the receiving environment. Among the design measures adopted, future mining infrastructure will be located within the area already disturbed by the former mine site, which will help limit the Harmful Alteration, Disruption and Destruction (HADD) of fish habitat. Despite these mitigation efforts, some impacts on fish and fish habitat will remain unavoidable.

Where residual impacts on fish and fish habitat cannot be avoided, the Policy for applying measures to offset harmful impacts to fish and fish habitat under the Fisheries Act (Fisheries and Oceans Canada, 2019), hereinafter referred as the "Policy", provides for the implementation of measures to offset fish mortality and HADD of fish habitat. The development of an offsetting plan is also required under Section 16 of Schedule 1 of the Authorizations Concerning Fish and Fish Habitat Protection Regulations (SOR/2019-286), enacted under the Fisheries Act.

The Policy sets out five key steps for developing an offering plan. This section corresponds to Step 2: Select measures to offset ¹

The offsetting area covered by this preliminary program is 110 ha.

¹ Step 1, entitled "Characterize the residual effects: death of fish and harmful disruption, destruction or destruction will be completed shortly. The other three steps are: (3) "Determine the number of measures to offset required", (4) "Establish the monitoring and reporting plan" and (5) " Submit offsetting plan to Fisheries and Oceans Canada for review". The step 5 will be implemented following DFO approval of the selected offsetting projects.

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26.2.1 Preliminary Selection of Offsetting Options

Several stakeholders, organizations and groups were consulted in order to provide an overview of the offsetting plan implemented in similar projects or in environments comparable to Troilus. These included the Lac Saint-Jean and La Capitale watershed organizations, the Fondation de la faune, the Canadian Parks and Wilderness Society (CPAWS Quebec), the Conseil régional de l'environnement et du développement durable du Saguenay Lac-Saint-Jean (CREDD), Nature Québec, and the Cree Council of Mistissini, in order to learn from their experiences with successful projects and to gather proposals for offsetting measures. Unfortunately, these efforts failed to identify any relevant options for the Troilus project.

At the same time, a literature review was carried out, including various environmental studies available on the MELCCFP Environmental Assessment Register. Among the projects consulted were:

- The offsetting measures project near Mistissini for the Renard diamond mine (Stornoway).
- The fish habitat offsetting program for the iron mine project in Lake Bloom.
- The City of Salaberry-de-Valleyfield's fish habitat offsetting project.
- The research project on fish habitat offsetting as part of the DSO (New Millennium Capital Corp.) project.

Tables 26.2 and 26.3 present a summary of the projects analyzed by type of project - spawning grounds and other types of fish habitat development - as well as the areas of habitat gain associated with each.

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Table 26.2 Summary of completed or ongoing offsetting projects - Spawning grounds

Project type	Project Name	Sector	Surface Area (m ²)	Total (m ²)
Walleye spawning ground development	Renard Diamond Mine - Stornoway	Near Mistissini	600	600
Brook trout spawning grounds development	DSO Project	Renard Diamond Mine - Stornoway	100	521,5
		GA-1 (main tributary)	60	
		GA-2 (main tributary)	32	
		GA-3 (main tributary)	23	
		Outfall E-1	7,5	
		La Cosa T2 Lake	15	
		La Cosa T3 Lake	30	
		La Cosa T4 FR1 Lake	22	
		La Cosa T4 FR2 Lake	115	
		La Cosa T5 FR1 Lake	32	
		La Cosa T6 FR1 Lake	75	
Lake trout spawning grounds development	DSO Project	Little Goodwood Lake	40	64
		Ridge FL-1 Lake	24	
Multispecies spawning ground development	Multispecies development within the hydrographic network, between Daviault and Carheil lakes	Daviault Lake tributary	22 000	300 000
		Daviault Lake outfall	140 000	
		Daviault Lake	88 000	
		Carheil Lake	50 000	
Total spawning area development :				301 185,5

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Table 26.3 Summary of compensation projects completed or underway - Other types of development

Project type	Project Name	Sector	Surface Area (m ²)	Total (m ²)
Stream and bank cleanup	Fox Diamond Mine - Stornoway	Near Mistissini	100	12 100
	DSO Project	La Cosa T6 Lake	4 400	
		La Cosa T6 FR1 Lake	7 600	
Bank stabilization	DSO Project	Lake La Cosa T5 banks	35	45
		Lake La Cosa T6 banks	10	
Creation of artificial reefs	Bank and contiguous developments along Baie Saint-François	Saint-François Lake	4 354	4 354
Rehabilitation of impassable culverts	Increase in tailings and waste rock storage capacity at the Bloom Lake iron mine	Schefferville	100 000	1 507 000
Water Level Increase	Increase in tailings and waste rock storage capacity at the Bloom Lake iron mine	Lac à la Loutre Lake (Baie-Comeau)	760 000	
		Petits Escoumins Lake	138 000	
		Ellen Lake	509 000	
Total other developments :				1 523 499

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The following subsections provide a more detailed analysis of the main types of development.

26.2.1.1 Spawning Ground Development Projects

Most offsetting projects carried out consist of or at least include the development of spawning grounds (see table 26.2). The most frequently targeted species is brook trout, with 11 projects totaling 521.5 m². Other projects specifically target walleye (1 project, 600 m²) and lake trout (2 projects totaling 64 m²). The largest projects are multi-species spawning grounds, representing 4 projects with a total surface area of 300 000 m².

The main issues behind these projects are the decline in reproduction of certain species and the loss of historic spawning grounds. The major constraint associated with these interventions lies in the use of large quantities of substrate (mainly stone) to be deposited in aquatic environments. It is essential that this material be free of fine particles to limit the risk of increasing suspended solids in the water. Although these developments generally generate modest gains in surface area, they can significantly improve the quality of fish habitat.

26.2.1.2 Watercourse and Riparian Clean-up and Enhancement

Three projects involve watercourse and riparian clean-up operations, aimed at improving fish habitat and restoring access to other aquatic habitats. Together, these projects represent an area gain of 12 100 m². The main issues addressed by this type of development are habitat fragmentation and the presence of obstacles to species migration.

26.2.1.3 Artificial Reefs Creation

A project carried out in Lake Saint-François involved the creation of artificial reefs, generating a surface gain of 4 354 m². The main aim of this project is to improve the quality of aquatic habitat and, potentially, to encourage an increase in the walleye population. It also includes restoration work above the rock key structures, as well as revegetation of the riprap located below the shoreline boundary.

26.2.1.4 Repair of Impassable Culverts

As part of the Bloom Lake iron mine project, a major project was carried out in the Schefferville area, involving the repair of culverts that had become impassable. The project restored some 100 000 m² of fish habitat. The main problems targeted by this type of intervention are habitat fragmentation and obstacles to species migration.

In addition, the deterioration of road infrastructures and their lack of maintenance contribute to sedimentation in breeding areas, reducing their quality and accessibility. These conditions also impact local communities by limiting the practice of traditional activities. Some areas are no longer accessible due to impassable culverts, which also compromise user safety.

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26.2.1.5 Water Levels Increase

As part of the Bloom Lake iron mine project, three development projects involved raising water levels in rivers and lakes, generating a total gain of 1 507 000 m² of fish habitat. These interventions required rehabilitation work to reinforce the structure of a dam to enable the reservoir level to be raised.

These projects support fish passage, particularly brook trout, while contributing to maintain and develop their habitat. They also ensure the stability of the aquatic ecosystem and the free movement of species.

26.2.2 Proposed Offsetting Projects

Offsetting measures are actions taken to offset the residual impacts of a project on fish and fish habitat, after the implementation of avoidance and mitigation measures. An offsetting project therefore includes several offsetting measures to achieve a gain in habitat function. The choice of offsetting measures depends primarily on DFO's expectations and requirements. In addition, the level of difficulty of monitoring to demonstrate the gain is considered in the choice of measures.

Selection criteria for an offsetting project are based on the guiding principles for compensation measures presented in DFO's *Policy for applying measures to offset harmful impacts to fish and fish habitat* (Fisheries and Oceans Canada, 2025). The main guidelines are as follows:

- Offsetting measures must generate benefits for fish and fish habitat that last long enough to offset the adverse impacts of the proposed project, ensuring no net loss of fish habitat, and to support, where applicable, the long-term conservation or recovery of aquatic species at risk.
- Proposed projects must be designed (planning, design, implementation and monitoring of offsetting measures) in collaboration with Indigenous peoples to take their concerns into account.
- An offsetting measure must go beyond any other existing requirement, incentive or benefit arising from legislation, regulations, plans and programs by providing benefits to fish and fish habitat that would not have been achieved in the absence of the obligation to develop offsetting measures.
- Offsetting measures must be implemented as close as possible to the affected areas so that the functions and integrity of the affected ecosystem can be maintained.
- Delays between the timing when the impacts of the project occur and the timing when the benefits of the offsetting measure become effective should be avoided or minimized (i.e. it is preferable to implement offsetting measures before damage is caused to the ecosystem).

The maps in Chapter 18 (Fish and Fish Habitat) of the Environmental and Social Impact Assessment (ESIA) (maps 18.2 and 18.3) illustrate the hydrography and the fish habitats within the study area under existing conditions and after the Bibou Creek diversion. The following Table 26.4 presents potential fish habitat offsetting projects in the Troilus mine area and in the area of the city of Chibougamau.

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Table 26.4 Potential fish habitat offsetting projects in the Troilus Mine and Chibougamau areas

Location	Project Description	Target Problem	Benefits	Restrictions	Habitat functions	Potential gain (m ²)
Troilus mine	Addition of artificial reefs for walleye and other lucifugous species	Lake A contains only one pool; the water is low in turbidity and walleyes therefore have access to a few shaded refuges.	Increased provision of light shelters for the target species and others that could use them for feeding or refuge, support structures for benthos and macrophytes.	An access road will have to be constructed to transport the barges and necessary machinery for the work, as well as the shelter structures.	Shelter - growths of all maturity stages	224 838
Troilus Mine	Development of two spawning grounds in-lake and f walleye stocking	Lake PE50 contains many pools and provides good walleye habitat, but walleye abundance appears to be low. There appear to be no spawning sites available in the streams around the lake.	Increase the supply of quality walleye spawning sites in the lake, adapted to different flood levels that have become highly variable in the spring with climate change.	An access road will have to be constructed to transport the barges and necessary machinery for the work, as well as the rock particles needed to shape the spawning grounds.	Spawning	7 259
Troilus Mine	Development of spawning grounds in the new Bibou Creek for walleye and other lotic-lithophilous species	The existing Bibou Creek contains spawning areas used by walleye from Lake PE43. Such habitats will have to be created in the new creek.	Replacement of spawning sites for whitewater species (walleye, white sucker and longnose sucker) with high potential for use, which will be destroyed during the reshaping of the Bibou Creek bed.	None: existing roads and rock material easily accessible	Spawning	6 027
Troilus mine	Development of sand pits to create a hydrographic network connected to fish-bearing watercourses/waterbodies	A series of sand pits are located along the mine road that connects to the Route du Nord. If no longer in use, they could form a new hydrographic network suitable for ichthyofauna.	Creation of new water bodies connected to an existing hydrographic network.	Roads existing and rock material easily accessible, demonstrating that the site is dry	Aquatic habitats with multiple functions	69 934
City of Chibougamau	Reconnection of isolated meanders to the linearized main course of the watercourse	Like many watercourses in Quebec, David Creek has been straightened and linearized to facilitate water flow during spring floods. As demonstrated by monitoring conducted in the Abitibi region, aquatic life conditions deteriorate under ice cover, creating a harmful environment for fish and other aquatic organisms.	General improvement in the quality of the ecosystem for aquatic life in isolated meanders.	Work to be carried out in winter, or access road needed to be built over marshy areas / possible loss of wetlands	Aquatic habitats with multiple functions	17 162
City of Chibougamau	Development of a flood plain for yellow perch and northern pike spawning	Several successive backfilling operations have been successively carried out along the banks of watercourses in the city of Chibougamau. With this type of habitat, which is very important for the reproduction of phytophilous lentic species.	Given the appearance of the rises around David Creek, flood plains could be created around the meanders reconnected to the watercourse to support both yellow perch and northern pike spawning, and give the watercourse a degree of freedom, thereby reducing the flooding risk during floods and heavy rains.	Work to be carried out in winter, or access road needed to be built over marshy areas / loss of wetlands possible	Spawning	12 133
City of Chibougamau	Rehabilitation of culverts or access to facilitate fish migration	There appear to be several obstacles to fish passage along this watercourse which connects two large water bodies.	Fish passage facilitated within a hydrographic network that includes sections isolated by inadequate stream crossings	None: existing roads and rock material easily accessible	Passage - Fish migration	9 661
Total :						357 014

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