

Guy Dufour Environment Superintendent Glencore -Raglan Mine 1950, Maurice-Gauvin, Suite 300 Laval, QC H7S 1Z5

SUBJECT: Invitation to attend an information and exchange workshop on the Status and Management of Final Waste in Northern Québec

Dear Mr. Dufour,

On December 17, 2020 the Minister of Environment and the Fight against Climate Change, Mr. Benoit Charette delivered a mandate to the Bureau d'audiences publiques sur l'environnement (BAPE) to conduct province wide enquiry and consultation on the status and management of final waste. Simply defined, final waste is residual materials that are not recovered and therefore must be eliminated. The BAPE's mandate entails:

- 1. Develop an overall picture of the management of ultimate waste;
- Develop an overall picture of the disposal capacity for the next 20 years to include the number, capacity and distribution of required installations;
- Analyze existing elimination or treatment methods as well as innovative technologies and mechanisms;
- 4. Identify stakeholders by indicating their roles and concerns with regard to the management of ultimate waste;
- Assess measures, solutions or requirements aimed at ensuring better management of ultimate waste taking into account regional contexts;
- Determine the conditions favorable to the social acceptability of the options analyzed, based on best practices.

This mandate also includes Nunavik and as such, the BAPE approached the Kativik Environmental Advisory Committee (KEAC) in its capacity as the preferential and official forum on matters related to the environmental and social protection regime under Section 23 of the James Bay and Northern Quebec Agreement to co-preside over the consultations to be held in the region. As part of the BAPE's consultation strategy, their commission has organized a series of workshops to deepen its understanding and to identify its approach and perspective on different aspects of the management of final waste. Various organizations, municipalities, site managers, researchers and specialists who are familiar with the issues surrounding ultimate waste are invited to attend such that they can share their perspectives with the KEAC and BAPE commissions.

To this effect, you or one of your representatives are formally invited to participate in the workshop to be held remotely on April 23, 2021. This workshop specifically targets the issues specific to northern Quebec, as well as remote areas and isolated communities, related to the planning, operation and financing of residual materials management. It will

also identify the challenges of the current mechanisms and explore avenues for improvement. The themes addressed include:

- Issues related to waste transportation: high cost, handling, storage, etc.
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- Permanent storage of non-combustible waste.
- Investment in waste management.
- Support from authorities in relation to waste management (legal requirements, recovery activities implementation, etc.).
- Community awareness and involvement in waste management.
- Implementation of the modernized selective collection and beverage deposit systems.
- Monitoring by authorities in isolated regions, especially outside municipal boundaries.
- Implementation of Organic Matter Valorization Strategy.

Simultaneous interpretation will be available in English and French. Should you be interested in participating please confirm your attendance with the KEAC's Environmental Analyst Ms. Nancy Dea (nancyldea@gmail.com) by April 15, 2021. Should you have any questions or require further information you may also contact the KEAC's secretariat at the coordinates below.

Respectfully,

The KEAC commission



Jusipi Kulula Mayor Northern Village of Quaqtaq Box 107 J0M 1J0

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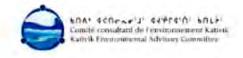
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The KEAC commission

cc. Johnny Oovaut, Municipal Manager, Northern Village of Quaqtaq



Lucy Qalingo Aupalu Mayoress Northern Village of Puvirnituq Box 150 J0M 1P0

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Dear Ms. Qalingo Aupalu,

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cc. Tommy Sallualuk, Assistant Municipal Manager, Northern Village of Puvirnituq



Markusi Qisiiq Director Renewable Resources, Environment, Lands and Parks Kativik Regional Government P.O. Box 9 Kuujjuaq, QC JOM 1C0

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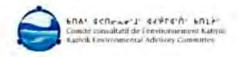
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Noah Eetook Mayor Northern Village of Kangirsuk Box 90 J0M 1A0

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cc. Johnny Nassak, Municipal Manager, Northern Village of Kangirsuk



Paulusie Papigatuk Senior Mayor Northern Village of Salluit Box 240 J0M 1S0

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cc. Peter Puxley, Municipal Manager, Northern Village of Salluit



Qiallak Nappaaluk Mayor Northern Village of Kangirsujuaq Box 60 JOM 1K0

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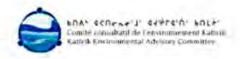
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cc. Tiivi Qumaaluk, Municipal Manager, Northern Village of Kangirsujuaq



Sammy Koneak Mayor Northern Village of Kuujjuaq Box 210 J0M 1C0

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Simeonie Nalukturuk Mayor Northern Village of Inukjuak Box 234 JOM 1M0

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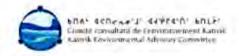
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cc. Shaomik Inukpuk, Municipal Manager, Northern Village of Inukjuak



Salimuni Qavavauk Mayor Northern Village of Ivujivik Box 20 JOM 1H0

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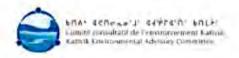
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cc. Saima Kanarjuark, Municipal Manager, Northern Village of Ivujivik



Anthony Ittoshat Mayor Northern Village of Kuujjuaraapik Box 360 JOM 1G0

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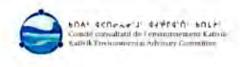
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cc. Marty Visitor, Municipal Manager, Northern Village of Kuujjuaraapik



Billy Cain Mayor Northern Village of Tasiujaq Box 210 J0M 1C0

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This mandate also includes Nunavik and as such, the BAPE approached the Kativik Environmental Advisory Committee (KEAC) in its capacity as the preferential and official forum on matters related to the environmental and social protection regime under Section 23 of the James Bay and Northern Quebec Agreement to co-preside over the consultations to be held in the region. As part of the BAPE's consultation strategy, their commission has organized a series of workshops to deepen its understanding and to identify its approach and perspective on different aspects of the management of final waste. Various organizations, municipalities, site managers, researchers and specialists who are familiar with the issues surrounding ultimate waste are invited to attend such that they can share their perspectives with the KEAC and BAPE commissions.

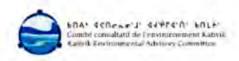
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- Implementation of the modernized selective collection and beverage deposit systems.
- Monitoring by authorities in isolated regions, especially outside municipal boundaries.
- Implementation of Organic Matter Valorization Strategy.

Respectfully,

The KEAC commission

cc. Christian Pert, Secretary Treasurer, Northern Village of Tasiujaq



David Annanack Mayor Northern Village of Kangiqsualujjuaq Box 120 JOM 1N0

SUBJECT: Invitation to attend an information and exchange workshop on the Status and Management of Final Waste in Northern Québec

Dear Mr. Annanack,

On December 17, 2020 the Minister of Environment and the Fight against Climate Change, Mr. Benoit Charette delivered a mandate to the Bureau d'audiences publiques sur l'environnement (BAPE) to conduct province wide enquiry and consultation on the status and management of final waste. Simply defined, final waste is residual materials that are not recovered and therefore must be eliminated. The BAPE's mandate entails:

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Respectfully,

The KEAC commission

cc. Jim Stewart, Municipal Manager, Northern Village of Kangiqsualujjuaq



Eli Aullaluk Mayor Northern Village of Akulivik Box 50 JOM 1V0

SUBJECT: Invitation to attend an information and exchange workshop on the Status and Management of Final Waste in Northern Québec

Dear Mr. Aullaluk,

On December 17, 2020 the Minister of Environment and the Fight against Climate Change, Mr. Benoit Charette delivered a mandate to the Bureau d'audiences publiques sur l'environnement (BAPE) to conduct province wide enquiry and consultation on the status and management of final waste. Simply defined, final waste is residual materials that are not recovered and therefore must be eliminated. The BAPE's mandate entails:

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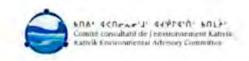
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Respectfully,

The KEAC commission

cc. Salamonie Cruikshank, Municipal Manager, Northern Village of Akulivik



Stéphane Twigg Environment Superintendent Canadian Royalties Inc. 800 René-Lévesque Boulevard West Montréal, QC H3B 1X9

SUBJECT: Invitation to attend an information and exchange workshop on the Status and Management of Final Waste in Northern Québec

Dear Mr. Twigg,

On December 17, 2020 the Minister of Environment and the Fight against Climate Change, Mr. Benoit Charette delivered a mandate to the Bureau d'audiences publiques sur l'environnement (BAPE) to conduct province wide enquiry and consultation on the status and management of final waste. Simply defined, final waste is residual materials that are not recovered and therefore must be eliminated. The BAPE's mandate entails:

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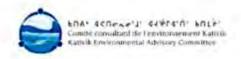
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Simultaneous interpretation will be available in English and French. Should you be interested in participating please confirm your attendance with the KEAC's Environmental Analyst Ms. Nancy Dea (nancyldea@gmail.com) by April 15, 2021. Should you have any questions or require further information you may also contact the KEAC's secretariat at the coordinates below.

Respectfully,

The KEAC commission



Tamisa Grey Mayor Northern Village of Aupaluk Box 6 JOM 1X0

SUBJECT: Invitation to attend an information and exchange workshop on the Status and Management of Final Waste in Northern Québec

Dear Mr. Grey,

On December 17, 2020 the Minister of Environment and the Fight against Climate Change, Mr. Benoit Charette delivered a mandate to the Bureau d'audiences publiques sur l'environnement (BAPE) to conduct province wide enquiry and consultation on the status and management of final waste. Simply defined, final waste is residual materials that are not recovered and therefore must be eliminated. The BAPE's mandate entails:

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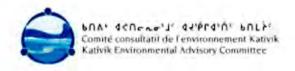
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Respectfully,

The KEAC commission

cc. Paulusie Kaitak, Secretary Treasurer, Northern Village of Aupaluk



March 1, 2021

Noah Swappie Chief Naskapi Nation of Kawawachikamach P.O. Box 5111 Kawawachikamach, QC G0G 2Z0

SUBJECT: The BAPE's consultation on the site status and management of ultimate waste (L'état des lieux et la gestion des résidus ultimes)

Dear Chief Swappie,

On January 18, 2021 the Kativik Environmental Advisory Committee (KEAC) received a letter from the president of the Bureau d'audiences publiques sur l'environnement (BAPE) - Mr. Philippe Bourke, to inform us of a mandate issued by the Quebec Minister of Environment and the fight against climate change to hold province-wide consultations on the site status and management of ultimate waste. Mr. Bourke specified that the mandate also covers the territories identified under Sections 22 and 23 of the James Bay and Northern Quebec Agreement as well as that under Section 14 of the North Eastern Quebec Agreement. On February 4, 2021 our secretariat contacted one of your consultants, Ms. Lindsay Richardson to see if the BAPE had communicated with the Naskapi Nation of Kawawachikamach (NNK) concerning this matter, however, Ms. Richardson has informed us that the BAPE has not done so.

Following a meeting on February 9, 2021 with the BAPE's commission, the members of the KEAC have agreed to accept to co-chair the undertaking of this mandate for the Nunavik region. However, at present, the general parameters of how the consultation will be realized remain to be defined.

Before proceeding, the KEAC would like to discuss the terms of the BAPE's mandate with you and get an understanding of how you would like to participate in the Nunavik portion of the consultations. As with the consultations on Uranium Industry Issues held in 2014-2015, we would also like to inform you that the BAPE would be open to developing a consultation format suited to the specific needs of the NNK. The KEAC remains available to facilitate communication between the NNK and the BAPE and will keep you informed of any future developments.

Please find attached a copy of the BAPE's letter dated January 18, 2021 (in French) and do not hesitate to contact our secretariat should you have any questions or require additional information.

Best regards,

Paule Halley

Talu

Chairperson, KEAC

Att.

cc. Lindsay Richardson, Project Coordinator (Environment and Community Consultation), Atmacinta Inc.



Kuujjuaq, le 15 février 2021

Ian Courtemanche
Bureau de stratégie législative et réglementaire
Ministère de l'Environnement
et de la Lutte contre les changements climatiques
900, boulevard René-Lévesque Est, bureau 800
Québec (Québec) G1R 2B7

Objet: Commentaires sur les nouveaux formulaires de déclaration de conformité découlant de l'entrée en vigueur du règlement sur l'encadrement d'activités en fonction de leur impact sur l'environnement (REAFIE)

Monsieur Courtemanche,

Le Comité consultatif de l'environnement Kativik (CCEK) a été créé en vertu du chapitre 23 de la Convention de la Baie-James et du Nord québécois (CBJNQ). Le CCEK est un organisme consultatif en matière de protection de l'environnement et du milieu social du Nunavik auprès des gouvernements responsables. En cette matière, il est l'intermédiaire privilégié et officiel des gouvernements du Canada et du Québec ainsi que de l'Administration régionale Kativik (ARK), des corporations municipales nordiques et de la Nation naskapie de Kawawachikamach, lorsque requis. Dans le cadre de la consultation publique en cours sur les nouveaux formulaires de déclaration de conformité et en continuité de sa participation aux tables de cocréation pour le règlement sur l'encadrement d'activités en fonction de leur impact sur l'environnement (REAFIE), le CCEK souhaite vous faire part de ses commentaires.

Certaines activités admissibles à une déclaration de conformité sont automatiquement assujetties au processus d'évaluation des répercussions sur l'environnement du chapitre 23 de la CBJNQ, tel que la construction d'un chemin dans le cadre d'une activité d'aménagement forestier ou encore l'établissement d'une carrière ou d'une sablière à des fins commerciales. Il est donc important que les formulaires de déclaration de conformité permettent aux personnes souhaitant entreprendre un projet dans la région de la Baie James et du Nord québécois de comprendre qu'elles doivent d'abord, le cas échéant, se conformer à la procédure nordique (Titre II de la LQE) avant de débuter leur activité. Le CCEK considère que la formulation de la première affirmation de la section 2.4 « Procédure d'évaluation et d'examen des impacts sur l'environnement et le milieu social applicable à la région de la Baie-James et du Nord québécois » pourrait être améliorée. Voici une proposition de formulation qui nous apparaît plus claire pour un promoteur qui ne serait pas au fait de la procédure nordique : « Remplissez cette section si le projet est localisé dans la région de la

Secrétariat du CCEK
C. P. 930, Kuujjuaq (Québec) J0M 1C0
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Baie-James et du Nord québécois et qu'il n'est pas obligatoirement soustrait à la procédure d'évaluation et d'examen des impacts sur l'environnement et le milieu social (art. 48 REAFIE) (https://www.environnement.gouv.qc.ca/evaluations/mil-nordique/index.htm) ».

Au Nunavik, l'inuktitut est la langue maternelle de 87 % de ses 13 188 habitants¹. L'anglais est la langue seconde la plus parlée, avec 10 720 locuteurs² tandis que le français est maîtrisé par moins de 4 000 personnes³. Dans ce contexte, l'accomplissement d'une démarche administrative complexe nécessitant une compréhension fine et nuancée de plusieurs règlements est un défi d'autant plus compliqué si elle doit être réalisée uniquement en français. Afin de rendre les nouveaux formulaires de déclaration de conformité plus accessibles aux promoteurs du Nunavik, le CCEK recommande qu'ils soient rendus disponibles en anglais. De plus, afin de rendre les autres démarches administratives entourant les déclarations de conformité accessibles à la population du Nunavik, le CCEK recommande que la correspondance entre le ministère de l'Environnement et de la Lutte contre les changements climatiques (MELCC) et un promoteur du Nunavik se fasse en français et en anglais et que l'interface pour le paiement des frais exigibles soit également disponible dans les deux langues.

La section 2.3.1.4 portant sur le plan géoréférencé (art. 41 al. 1 (5) REAFIE) demande au promoteur d'inclure l'information sur la présence de milieux humides et hydriques (MHH) ainsi que la désignation de ces milieux. Des balises supplémentaires permettant de clarifier les attentes du MELCC permettraient de guider les promoteurs quant à l'identification des MHH sur le plan géoréférencé. Par exemple, il pourrait être pertinent de préciser jusqu'à quelle distance des limites de l'activité les MHH doivent être identifiés. La deuxième affirmation de la section 2.3.1.4 pourrait être reformulée ainsi : « 2. La présence de milieux humides et hydriques dans un rayon de x m. de l'activité et leur désignation ».

Le dernier énoncé de la section 2.3.1.4 demande au promoteur de confirmer que l'identification et la délimitation des MHH ont été réalisées selon les documents diffusés par le MELCC. Le lien fourni en note de bas de page renvoie au Guide d'identification et de délimitation des milieux humides du Québec méridional. Comme le CCEK le soulignait dans ses commentaires sur le REAFIE en mai 2020, la situation des MHH est particulière au Nunavik. En effet, ces milieux y sont à la fois omniprésents et peu étudiés et cartographiés. La présence de pergélisol continu sur une grande portion du territoire du Nunavik affecte le drainage et favorise notamment la présence d'espèces hydrophiles. Le Guide d'identification et de délimitation des milieux humides du Québec méridional n'est pour ainsi dire pas représentatif de la région du Nunavik. La caractérisation des MHH en zone de pergélisol doit être faite et adaptée au Nunavik, notamment parce que le drainage naturel des eaux s'effectue de manière différente dans ces milieux, ce à quoi s'ajoute une importante variation saisonnière. En guise d'exemple, le promoteur d'une activité ne sera pas en mesure de fournir un renseignement exact quant au niveau des eaux souterraines de la carrière ou de la sablière telle qu'il est exigé dans la section 3 (5) du formulaire de déclaration de conformité

3Ibid.

Rivet, F. (2020) Nunavik. The Canadian Encyclopedia [https://www.thecanadianencyclopedia.ca/fr/article/nunavik]

² Statistique Canada (2017). Profil du recensement du Nunavik.

pour l'établissement ou l'agrandissement d'une sablière et/ou pour le traitement de substances minérales de surface dans une sablière ou une carrière – articles 117 et 118 du REAFIE. Le Nunavik est une région éloignée où les coûts associés au déplacement d'experts en mesure de désigner formellement un MHH sont très élevés. Pour que les MHH du Nunavik soient pleinement reconnus et considérés, il faudrait que le gouvernement développe et mette à disposition des outils adaptés à la réalité nordique. Cela favoriserait un développement respectueux des normes environnementales les plus strictes sans faire reposer un fardeau économique et administratif disproportionné sur les petits promoteurs comme les villages nordiques.

L'entrée en vigueur du REAFIE est accompagnée d'un virage numérique pour les démarches de déclaration de conformité. L'envoi postal demeure cependant obligatoire pour la garantie financière (section « Garantie financière (art. 119 REAFIE) »). Cela suscite des inquiétudes au Nunavik où les délais administratifs et postaux sont très longs, ce qui pourrait avoir pour effet de retarder le début d'une activité.

La section « Paiement (art 41 al.2 REAFIE) » décrit quant à elle la procédure pour le paiement des frais exigibles et suscite des enjeux d'ordre administratif et technique pour le Nunavik. Il est indiqué qu'un code unique sera acheminé au promoteur afin d'effectuer le paiement. Le paiement par carte de crédit et le paiement en ligne présentent des obstacles potentiels au Nunavik. Il n'y a pas d'institution bancaire dans les villages nordiques et ces derniers fonctionnent encore beaucoup avec le paiement par chèque. De plus, le débit de la connexion internet est si faible dans certains villages nordiques que la connexion à l'interface de paiement pourrait s'avérer impossible. Il serait donc utile d'ajouter des informations sur le paiement par chèque sur les formulaires.

Le CCEK souhaite finalement vous faire part de certaines améliorations à envisager plus spécifiquement dans le formulaire de déclaration de conformité pour l'établissement ou l'agrandissement d'une sablière et/ou pour le traitement de substances minérales de surface dans une sablière ou une carrière – articles 117 et 118 du REAFIE :

- Un ajustement de la numérotation dans les sections 2.1 et 3 en ajoutant des sous-sections permettrait de se référer plus facilement aux différentes parties du formulaire. Par exemple, les sous-sections 2.1.1 et 2.2.1 pourraient être ajoutées, ce qui éviterait la double occurrence des questions « 1. » et « 2. » dans la section 2.1.
- Il manque le mot « si » dans la phrase suivant l'astérisque sous la première affirmation de la section 2.1 concernant le traitement de substances minérales de surface dans une sablière ou une carrière.
- Des indications sur les articles du REAFIE concernés dans la section 2.2 sur le changement à l'égard d'une activité autorisée seraient utiles pour faciliter l'orientation des promoteurs.

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Courriel: bpatenaude@krg.ca

Nous vous remercions à l'avance de l'attention qui sera portée à ces commentaires et nous demeurons disponibles, le cas échéant, pour discuter plus amplement de nos observations avec les représentants de votre ministère.

Nous vous prions de recevoir, Monsieur Courtemanche, nos plus respectueuses salutations.

Paule Halley, présidente

Talan

Secrétariat du CCEK C. P. 930, Kuujjuaq (Québec) J0M 1C0 Tél.: 819-964-2961, poste. 2287 Fax: 819-964-0694

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Kuujjuaq, le 5 février 2021

Cynthia Claveau
Directrice
Direction régionale de l'analyse et de l'expertise de l'Abitibi-Témiscamingue et du Nord-du-Québec
Pôle d'expertise Nordique-minier
Ministère de l'Environnement et de la Lutte contre les changements climatiques
180, boul. Rideau
Rouyn-Noranda (Québec) J9X 1N9

Objet: Recommandations concernant la phase 3 des travaux de nettoyage des sites de la ligne de stations radars Mid-Canada

Madame Claveau,

Le Comité consultatif de l'environnement Kativik (CCEK) tient à remercier les représentants du ministère de l'Environnement et de la Lutte contre les changements climatiques (MELCC) qui ont assisté à sa 166e réunion le 3 décembre 2020. Des représentants de l'Administration régionale Kativik (ARK), de la Nation naskapie de Kawawachikamach et du gouvernement de la Nation crie y ont également assisté, ce qui a permis de tenir un forum d'échanges réclamé depuis longtemps concernant la restauration des 42 sites de la ligne de stations radars Mid-Canada situés dans le Nord québécois. Au cours de cette réunion, le MELCC a demandé des informations complémentaires sur les meilleures façons de consulter les communautés et les organismes régionaux concernés au sujet de la phase 3 des travaux de nettoyage de ces sites ainsi que sur les coûts et la logistique associés à ce type de travaux. Voici les recommandations du CCEK.

Recommandation 1: Revue de la littérature

Comme vous le savez, d'importants travaux de restauration ont déjà été effectués sur ces sites sous la supervision de l'ARK, dans le cadre d'ententes de contribution conclues par le gouvernement provincial, le gouvernement fédéral et l'ARK. Les travaux effectués lors des phases 1 et 2 visaient à assurer la sécurité publique et la protection de l'environnement ainsi qu'à atténuer les impacts actuels et potentiels des sites de la ligne de stations radars Mid-Canada. Des rapports complets de ces travaux et de l'évaluation initiale des sites sont disponibles à des fins de référence aux bureaux de l'ARK situés à Kuujjuaq.

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Par ailleurs, le CCEK a transmis en 2012 un mémoire aux administrateurs provincial et fédéral du chapitre 23 de la Convention de la Baie-James et du Nord québécois (CBJNQ) présentant des renseignements détaillés sur les travaux réalisés dans le passé ainsi que des recommandations concernant une dernière phase de travaux de nettoyage de ces sites en collaboration avec les communautés inuites, naskapie et cries et à leur entière satisfaction. Une copie du mémoire en question est jointe à la présente lettre.

De même, en raison de la participation de l'ARK aux travaux de restauration antérieurs des sites de la ligne de stations radars Mid-Canada et de ses décennies d'expérience de projets de réhabilitation de sites d'exploration minière et de camps de pourvoirie abandonnés au Nunavik, le CCEK a collaboré avec le Service des ressources renouvelables, de l'environnement, du territoire et des parcs de l'ARK en vue de fournir au MELCC des copies du *Plan d'intervention global 2019-2022 pour la réhabilitation des sites d'exploration minière abandonnés au Nunavik* (ARK, 2019) et du *Guide pratique pour le démantèlement, le nettoyage et la restauration des camps de pourvoirie sur le territoire de la CBJNQ et de la CNEQ* (ARK, 2019) qui contiennent des renseignements détaillés sur la logistique et les coûts associés à ce type de travaux au Nunavik. Ces renseignements portent notamment sur les ressources humaines, les coûts de transport, le traitement des matières résiduelles, la formation ainsi que la communication des résultats aux communautés et la traduction de documents.

Recommandation 2: Séances d'information publique

Compte tenu de l'emplacement des 42 sites de la ligne de stations radars Mid-Canada (35 au nord et 7 au sud du 55° parallèle), le CCEK suggère fortement au MELCC de demeurer en communication avec les parties inuite, naskapie et crie et particulièrement avec les communautés de Chisasibi, de Whapmagoostui, de Kuujjuaraapik et de Kawawachikamach. Des séances d'information visant à diffuser des renseignements détaillés sur la caractérisation et l'emplacement des sites ainsi qu'à permettre aux communautés de faire part de leurs préoccupations et de discuter de leur participation éventuelle à la phase 3 des travaux de nettoyage devraient être tenues avant l'élaboration d'un plan de travail. En fait, de telles séances d'information devraient aider à orienter le cadre gouvernemental pour la restauration de sites sur le territoire.

Recommandation 3: Implication régionale

Les sites de la ligne de stations radars Mid-Canada demeurent une source de préoccupations pour les communautés inuites, naskapie et cries qui continuent d'utiliser ces secteurs pour leurs activités traditionnelles. Bien que des travaux de restauration aient été effectués, ces communautés ainsi que des organismes régionaux tels que le CCEK et l'ARK demeurent fermement résolus à voir se terminer la restauration de ces sites. Suivant la caractérisation récente des sites et la discussion qui a eu lieu à la 166° réunion du CCEK, il semble évident que le gouvernement du Québec tient lui aussi à atteindre cet objectif. À mesure que le projet avance, il sera important de tenir les parties concernées informées et de les inviter à participer. En outre, le CCEK considère qu'en raison de son importante expérience en la matière, l'ARK devrait jouer un rôle crucial dans l'élaboration du plan de travail pour le Nunavik et sa réalisation.

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Conclusion

Le CCEK est d'avis qu'une meilleure compréhension des résultats de la caractérisation 2017-2018, réalisée par un consultant engagé par le MELCC, aidera à l'évaluation et à la planification des travaux de nettoyage de la phase 3. À ce titre, le CCEK souhaite inviter le MELCC à participer à sa 167^e réunion qui se tiendra virtuellement les 17 et 18 mars 2021 pour présenter plus en détail les travaux de caractérisation et pour poursuivre la discussion avec des organismes régionaux concernant la phase 3 des travaux de nettoyage.

Nous vous remercions de bien vouloir envisager notre invitation et vous prions de communiquer avec notre secrétariat pour de plus amples renseignements ou confirmer votre présence.

Veuillez agréer, Madame Claveau, l'expression de nos sentiments les meilleurs.

La présidente,

Paule Halley

p. j 3

 c. c. M. Marc Croteau, sous-ministre, MELCC et administrateur provincial du chapitre 23 de la CBJNQ

M. Markusi Qisiiq, directeur, Service des ressources renouvelables, de l'environnement, du territoire et des parcs, ARK

Chef Noah Swappie, Nation naskapie de Kawawachikamach

Cameron McLean, gouvernement de la Nation crie

February 5, 2021

Cynthia Claveau
Director
Regional Department of Analysis and Expertise in Abitibi-Témiscamingue and Nord-du-Québec
Northern-mining pole of expertise
Ministry of Environment and the Fight against Climate Change
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Subject: Recommendations Regarding Phase 3 Clean-up of Mid-Canada Line Sites in Nunavik

Dear Ms. Claveau,

The Kativik Environmental Advisory Committee (KEAC) would like to thank the representatives of the Ministry of Environment and the Fight against Climate Change (MELCC) for attending our 166th meeting on December 3, 2020. This meeting was also attended by representatives from the Kativik Regional Government (KRG), the Naskapi Nation of Kawawachikamach and the Cree Nation Government, facilitating a long-requested forum for an exchange concerning the restoration of the 42 Mid-Canada line radar sites in Northern Québec. During this meeting the MELCC requested further information regarding the best methods to consult with the concerned communities and regional organizations in regards to a phase 3 clean-up on these sites, as well as potential costs and logistics associated with this type of restoration work. Below are the KEAC recommendations.

Recommendation 1: Literature Review

As you are aware, there has already been a significant amount of restoration work carried out on these sites, under the supervision of KRG and with contribution agreements between provincial, federal and regional governments. The phase 1 & 2 clean-up projects involved a series of rehabilitation measures aimed at ensuring public safety and environmental protection as well as mitigating the current and potential environmental impact of the Mid-Canada Line sites. Full reports regarding these works and the original site assessment are available at the KRG office in Kuujjuaq for reference.

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Furthermore, in 2012 the KEAC transmitted a brief to both the Provincial and Federal Administrators of the JBNQA that provided detailed information concerning the clean-up work undertaken in the past as well as recommendations regarding a complete and final clean-up of the sites in collaboration, and to the satisfaction of, the Inuit, Naskapi and Cree communities on the territory. Enclosed is a copy of this brief for your review.

Likewise, as a result of KRG's past involvement in the remediation of Mid-Canada Line radar sites as well as their decades of experience with other restoration projects on abandoned mineral exploration sites and outfitting camps in Nunavik, the KEAC has collaborated with the Department of Renewable Resources, Environment, Lands and Parks to provide the MELCC with copies of the 2019-2022 General Response Plan For the Rehabilitation of Abandoned Mineral Exploration Sites in Nunavik (KRG, 2019) and the Practical Guide for the Dismantlement, Clean-up and Remediation of Outfitting camps in the JBNQA/NEQA Territory (KRG, 2019) which provide ample information regarding logistics and costs associated with rehabilitation activities in Nunavik. These parameters include human resources, transportations costs, waste treatment, training, as well as community outreach and translation of written materials.

Recommendation 2: Public Information Sessions

Given the location of the 42 Mid-Canada Line sites (35 sites north and seven sites south of the 55th parallel), the KEAC strongly suggest the MELCC maintain communication with Inuit, Naskapi and Cree parties and in particular the communities of Chisasibi, Whapmagoostui, Kuujjuaraapik and Kawawachikamach. Information sessions to provide details concerning the characterization, maps of site locations and to provide an opportunity for communities to express their concerns and discuss potential involvement in the phase 3 clean-up should be held prior to the development of a work plan, and should in fact help guide the government's framework for site remediation on the territory.

Recommendation 3: Regional Involvement

The Mid-Canada Line sites remain of particular concern to Inuit, Naskapi and Cree communities who continue to use these areas for traditional activities. Although some restoration activities have been carried out on the sites, these communities as well as regional organizations such as the KEAC and KRG remain firmly committed to their complete rehabilitation. Given the recent site characterization and following the discussion during the 166th KEAC meeting, it is evident the Québec government is dedicated to this goal as well. As the project progresses it will be important to keep the concerned parties informed and involved. Additionally, the KEAC consider that given their accomplishments regarding site restoration, the KRG should play a crucial role during work plan development and project implementation in Nunavik.

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Conclusion

The KEAC are of the opinion that a better understanding of the results of 2017-2018 characterisation, conducted by a consultant contracted by the MELCC, will be important in the planification and examination of a phase 3 cleanup. As such, the KEAC wish to invite the MELCC to participate in our 167th meeting to be held virtually on March 17 and 18, 2021 to present the recent site characterization in more detail and to continue the discussion with regional organizations regarding the advancement of the phase 3 clean-up.

We thank you for considering our invitation and should you be available or require further information please contact our secretariat at the coordinates below.

Respectfully,

Paule Halley

President, KEAC

Att. 3

cc. Marc Croteau, Deputy Minister, MELCC and Provincial Administrator of JBNQA Markusi Qisiiq, Director, Renewable Resources Environment, Lands and Parks Department, Kativik Regional Government Chief Noah Swappie, Naskapi Nation of Kawawachikamach Cameron McLean, Cree Nation Government

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Public Consultation Report on the Draft Nunavik Residual Materials Management Plan 2021–2027



January 2021

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List of Abbreviations

ELV: End-of-life vehicle

EPR: Extended Producer Responsibility

KRG: Kativik Regional Government

NL: Northern landfill

NV: Northern village

RMM: Residual Materials Management

RMMP: Residual Materials Management Plan

1. Introduction

As part of the review process of the Nunavik Residual Materials Management Plan, the Draft Plan for 2021–2027 (hereafter "RMMP") was the subject of a public consultation with the residents of Nunavik in accordance with the requirements of the Environment Quality Act (ss. 53.13 – 53.16). The goal of this public consultation report is to reflect the views expressed by organizations and community members during various public consultation activities. After considering all comments and suggestions, changes will be made to the Draft Plan before it is submitted to RECYC-QUÉBEC for a compliance analysis, which will be followed by the adoption of the final RMMP by the Kativik Regional Government (KRG) Regional Council.

2. Public Consultation

2.1 The Consultation Process

The KRG Regional Council, through its mandated Executive Council, adopted the Draft RMMP on September 23, 2020, following its review. The Draft Plan and a notice announcing its adoption were then posted on the KRG website. Public consultations began 45 days later for a three-week period from November 16 to December 4, 2020.

Since external stakeholders cannot travel to Nunavik and indoor gatherings are prohibited during this global pandemic, it was necessary to rethink and innovate public consultation activities while ensuring that the maximum number of people and organizations were reached. The results show just how successful this innovative approach has been.

2.2 Dissemination of Information

To facilitate communications regarding public consultations, a flyer was designed to illustrate and provide more information in articles posted on KRG's Facebook page and website.² The organized activities were announced on 12 Facebook postings, including reminders, between October 1³ and December 8⁴, on local radio broadcasts in the 14 Northern villages (NVs), and on Taqramiut Nipingat regional radio during the three weeks of public consultations. Comments under Facebook postings that promoted the activities were also gathered.

2.3 Public Consultation Materials and Activities

The public consultation was conducted in a number of ways to target as many people as possible in the context of the pandemic. These included releasing an explanatory video on the RMMP and a summary of the Plan, holding targeted consultations with the main regional organizations and businesses, conducting two one-hour remote public sessions, posting an online survey on residual materials management to obtain the opinions of Nunavimmiut, and inviting comments by e-mail and telephone to the KRG's Department of Renewable Resources, Environment, Lands and Parks.

Public release on KRG's website: https://www.krg.ca/en-CA/current-news/1039

² See flyer on the cover page of this public consultation report.

³ Announcement of the publication of the Draft RMMP:

https://www.facebook.com/kativikregionalgovernment/photos/a.471936623596399/789711745152217

⁴ Announcement of draw winners and acknowledgement of participants:

https://www.facebook.com/kativikregionalgovernment/photos/pcb.842186303238094/842185996571458/

A total of 62 eligible participants from the two remote public sessions and the survey were entered into a draw to win twelve door prizes. ⁵

Explanatory Video and Summary of the Plan

A 15-minute explanatory video outlining the Draft Plan was posted in English and Inuktitut on KRG's Facebook page and YouTube account. To make the 141-page RMMP more accessible to the public, a six-page summary was produced and translated from French to English and Inuktitut. The document was posted on the KRG website⁶ and Facebook page. It was also emailed to all organizations selected for targeted consultations.

Targeted Consultations

A total of 25 regional organizations and businesses, the 13 Landholding Corporations, and the 14 NVs were contacted with e-mails containing the Draft Plan summary and requests for one-on-one meetings to present the Draft Plan and obtain the comments and opinions of their representatives. Online or telephone sessions were held with 16 of the organizations who accepted a meeting, sometimes with more than one representative within the same organization, from different areas of operation (20 meetings of approximately one hour each):

- KRG Operations Departments
- Canadian Royalties (Nunavik Nickel mine)
- Inuulitsivik Health Centre
- Ungava Tulattavik Health Center
- Kativik Environmental Advisory Committee
- Kativik Ilisarniliriniq School Board
- Desgagnés Transarctik Inc.
- Nunavik Mineral Exploration Fund
- Fédération des coopératives du Nouveau-Québec (FCNQ) departments: Stores Services and Petroleum and Transport Services
- Makivik (construction, Inukjuak greenhouse project, climate change)
- Northern stores
- Nunavik Parks
- Nunavik Regional Board of Health and Social Services (food waste project)
- Akulivik NV
- Kangiqsualujjuaq NV
- Umiujag NV

These meetings were scheduled to present the Draft Plan (online using PowerPoint or over the phone using the RMMP summary that had been sent out previously), and to have discussions with the representatives. The measures for which these organizations had been selected as potential implementing partners were discussed to confirm their interest in making a contribution, and also to assess feasibility. Local plans were also presented to the Northern villages to ensure that they corresponded to their priorities.

⁵ To be considered eligible for the prize draw, session participants had to be actively involved by asking questions or making comments. Survey participants had to fully complete the survey and leave their contact information.

⁶ The link to the explanatory video, the summary of the Plan, the survey, and all events were posted on the KRG website: https://www.krg.ca/en-CA/current-news/1042

Remote Public Consultation Sessions

The first public consultation session was held on Monday, November 30, from 7 to 8 p.m., on Taqramiut Nipingat regional radio. This radio station broadcasts simultaneously to the 14 NVs. The first part consisted of presenting the Plan summary in Inuktitut, then in English. Listeners were then invited to call in. Although it was impossible to determine the total number of listeners, six people did participate by asking questions and offering comments.

The second session was organized through a Facebook Live event on Wednesday, December 2, from 7 to 8 pm. This time, the first part consisted of a presentation of the RMMP in English and then in Inuktitut, followed by a question period. Listeners were invited to give their opinions in the comments section of the Facebook post. Out of a total of 23 listeners of the live broadcast, five participated by writing a comment, and more than 300 consulted the posting afterwards (see Appendix 1 for statistics).

Residual Materials Management Survey

An online survey was sent out to obtain citizens' views on the Draft Plan and its measures. The survey consisted of 16 questions on a range of issues and was completed by 52 participants. The results of the survey are presented in detail in Appendix 1.

3. Summary of Opinions

The various opinions received were grouped into themes representing the main topics discussed. The themes are presented in order of importance, the most frequently discussed topics being first. The bullet points summarize participants' remarks, opinions, comments, and questions during the remote public sessions or from the survey, followed by a brief analysis where required. Comments gathered from organizations during the targeted consultations were also incorporated into the summary, unless they involved technical amendments to the RMMP, in which case they were excluded from this report to lighten the text.

Engage the Community Through Increased Awareness and Youth Involvement

- There is a need to increase awareness of available recovery programs, for example
 products covered by Extended Producer Responsibility (EPR) and returnable containers.
 According to the survey, over one-third of respondents never return their returnable
 containers, 50% are not aware of the existence of drop-off locations for EPR products,
 and almost 20% are not aware of any of the recovery activities mentioned in the plan.
- None of the respondents stated that awareness activities on RMM in Nunavik were sufficient. Virtually all survey respondents wanted more information on what to do with their waste.
- Several considered resistance to change to be a limitation to implementing the action plan.
 - o These comments confirm the importance of carrying out measure 1 of the action plan to adequately raise the awareness of all stakeholders impacted by the measures calling for a change in practice, as well as measure 4 for local plans, "Carry out an awareness-building campaign for locally available residual materials management methods."
- Youth can be proactive in improving residual materials management (RMM) and should be invited to participate in RMM decision-making processes. For example, a young man from Salluit won an award at the Aboriginal Science Fair for an ecocentre project.
- Leadership on environmental issues, such as RMM, can be promoted by supporting the development of locally initiated projects, particularly by youth.
- Local RMM committees can be created, in addition to the Plan's monitoring committee, to encourage citizen and youth involvement in RMM at the local level.
- Responsibility for the management of residual materials was not fully accepted since 25% of survey respondents did not acknowledge that it was the duty of all Nunavimmiut.
 - Therefore, more information should be provided to convince all waste generators that residual material management is their responsibility.
- Community clean-up activities should be part of the Plan, as well as the installation of public trash bins.

Find Alternatives to Open-Air Burning

- Participants repeatedly brought up provincial regulations permitting open-air burning.
 Many see these as unjust to Nunavik since the practice was banned in southern Quebec many years ago. As Quebec taxpayers, they believe they should have the same privilege of enjoying a smoke-free environment as other Quebec citizens.
- Measure 4, aimed at exploring alternatives to open-air burning, is hailed by some who
 see it as a promising initiative, but criticized by others who argue that burning will still be
 allowed for the next seven years. The second group believes it is a major health and
 environmental risk and would like it to stop immediately. Still others believe that by
 sorting waste through RMMP—proposed measures, implemented in all NVs so that only
 the final residues end up at a northern landfill (NL), burning can continue for some time
 at a reduced frequency.
- More than half of the survey respondents believed that open-air burning must stop and that it is harmful to the environment. However, 30% of the responses reflect a concern that stopping the burning could have consequences.
 - Therefore, before stopping this practice, the issue must be studied in depth so that sustainable solutions can be found to improve the situation.
 - Most of the measures in the Plan are aimed at reducing the quantity of residual materials disposed, and therefore the amount of waste burned.
- On several occasions, individuals and organizations raised the idea of installing an
 incinerator with heat recovery, which would provide more controlled combustion, reduce
 toxic fume emissions from open-air burning, and decrease the need for fossil fuels for
 heating. The difficulty in financing such a project was also discussed.
- Many would like to see the waste buried rather than burned, as in other types of disposal sites in Quebec.
- Others would like all waste that cannot be composted or reused locally to be sent to southern Quebec.
- Fire hazards are another issue related to burning. At times, NVs must try to control fires that threaten to spread outside the NL.

Compost Organic Matter and Develop Greenhouse Projects

- More than 86% of survey respondents were in favour of implementing a local organic matter composting project.
- Several Northern villages have greenhouse projects or would like to develop one.
 - To do so, they need soil and soil amendments. A composting project can be perfectly coupled with a greenhouse project since it can fulfil its requirements, provided that: the inputs are of high quality, i.e. source separation is well done by the participants (individuals and organizations); the composting process is controlled; and the compost produced is analyzed before agricultural use.
- Since wildlife control is a recurring concern, composting methods that do not attract wildlife must be selected.
- Food self-sufficiency could be increased through home composting and creating mini greenhouses for home food production.

Recover Recyclable Materials

- Survey respondents overwhelmingly supported reducing the frequency of garbage collection to provide new management options, such as the recovery of recyclable materials.
- Several participants would like to see a system set up to collect recyclable materials, particularly plastics, because of the negative environmental consequences when they are disposed of and burned in the open air, or just dumped in the wild.
- Acquiring a metal press to recycle metal was brought up. Irritation with the accumulation
 of residual metal in villages and NLs was voiced several times.
- The challenge of shipping these recyclable materials, including returnable containers, is a
 major one. There are currently not enough shipping containers available to meet this
 need. Businesses say they cannot participate in all recovery programs under current
 conditions and have to make choices or develop new solutions (EPR—soon to include
 appliances, returnable items, collection of recyclable materials, other materials, etc.).

Develop More Storage Facilities

- The issue of lack of storage was raised several times in the consultations. Whether it is to store a surplus of new construction materials or residual materials to be shipped, there is a lack of storage facilities in all communities. The lack of available shipping containers and heated shelters to protect all recyclable building and residual materials leads to wastage.
- It is sometimes simpler for organizations to transport building materials that are individually packaged (in wooden boxes with metal straps, which generates additional waste) rather than in containers because of the lack of space to store the contents before use.

Encourage Reuse

- In a number of ways, the topic of reuse has emerged as a key factor in improving RMM in the region. In fact, everyone can reuse and divert several categories of materials from going to disposal.
- The lack of infrastructure is a major obstacle to reuse. The need to create a dedicated space, such as a thrift store for clothing and small items, and an ecocentre or resource recovery centre for larger items, was often mentioned in all communities.

Improve the Management of Disposal Sites

- Several participants emphasized the importance of assigning a municipal employee to manage the NL and be present during business hours, especially for charging disposal fees to businesses and organizations. However, housing for this employee must be planned in advance.
- The sorting of residual materials sent to the NL could be improved, particularly for household hazardous waste. Collection of this type of waste could also be introduced to reduce the quantity sent for disposal. Setting up a facility such as an ecocentre to facilitate sorting was also raised.
- The majority of survey respondents were in favour of taking steps that would improve management of end-of-life vehicles (ELVs), currently stored throughout the region and at NLs, without draining their hazardous materials.

Concerns about environmental contamination by NLs were raised. It was suggested that
the soil surface beneath residual material storage sites be better sealed, particularly to
prevent the infiltration of hazardous materials into the environment.

Construct or Expand Disposal Sites

Since most NLs are filled to near capacity, the NVs interviewed emphasized the need to
expand disposal sites or construct new ones. This need arises from: current disposal sites
being too close to villages (which inconveniences residents on burning days or makes
burning impossible); large quantities of metal waste limiting the space available for
additional storage; or a combination of both. The space occupied by ELVs is of particular
concern to NVs.

Repair Appliances Locally

- It was proposed to develop a service, like the one offered to communities by the travelling sewing machine repairman, to repair household appliances, increase their lifespan, and reduce household purchases of new appliances. This measure would also reduce the quantity of disposed materials, especially in NLs already saturated with residual metal.
- A social economy project could be developed to initially offer this repair service to one village.

Develop Circular Economy Projects

- A few participants mentioned the concept of a circular economy, where one person's
 waste becomes another person's resource, and where the generation of non-recoverable
 and end-of-life products and packaging is minimized. Projects based on this principle
 could be developed, for example, by using residual plastic in the manufacture of concrete
 or insulation materials.
- Some participants would like to have plants in Nunavik for recycling residual materials and creating products to be sold outside the region.

Reduce at Source

- The sale of bulk products in Nunavik businesses would reduce packaging at the source and lower purchase costs for residents.
- Food waste was seen as a major source of waste and should be taken into consideration in the Plan. It was recommended that preservation of food quality be addressed when implementing measure 14.

Hold Building Contractors Accountable

- Steps should be taken to make building contractors more responsible for their waste disposal in NLs. Tenders could contain clauses requiring contractors to return with any waste and surplus building materials that they cannot dispose of locally (without eliminating them).
- Several discussions focused on the implementation of measure 13 and its importance was
 reinforced. The committee examining this measure could choose from different
 alternatives, but the option of developing a web platform to locate and provide surplus
 building materials seems most interesting at first glance, as well as containerizing rather
 than packaging materials individually (measure 14).

Abolish Single-Use Plastic Shopping Bags

 Survey respondents overwhelmingly supported banning plastic bags in stores and, since the measure is already in effect in their community, some are already accustomed to it.

4. Conclusion

In total, 25 representatives from 19 organizations or departments within the same organization were met during the targeted consultations, 52 people responded to the survey, 6 called in during the public radio session, 5 commented during the Facebook Live public session and 23 attended. In addition, there were those who listened to the radio and viewed Facebook Live at a later time.

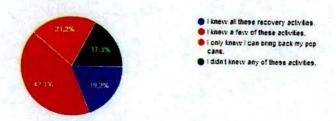
This high level of participation in the public consultations demonstrates a real interest in improving residual materials management by individuals and organizations in Nunavik. Although this report presents comments to make improvements, many positive comments were also received regarding the quality of the measures and the objectives pursued. The plan was described as well-structured and ambitious, but necessary. Several participants mentioned that they would like to be kept informed on the ongoing process and the progress in implementing the measures, which justifies the importance of measures 19 and 20 to ensure an accountable and transparent process.

The KRG is sensitive to the issues raised and will attempt to incorporate them into the Draft Plan to produce an improved version, which will be forwarded to RECYC-QUÉBEC in the coming weeks for compliance analysis. As required by the Environment Quality Act, this consultation report is made public on the KRG site.

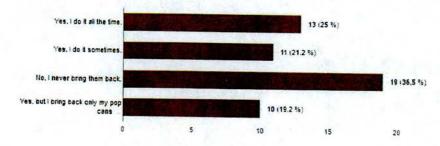
Waste management in Nunavik

1. Did you know about the recovery activities mentioned in the Plan (returnable containers, car tires, used motor oil, car batteries, etc.)?

52 réponses

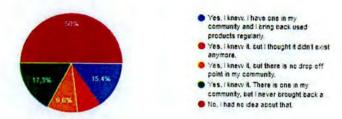


2. Do you bring back your returnable containers (pop cans, pop plastic bottles) (you can check more than one choice)

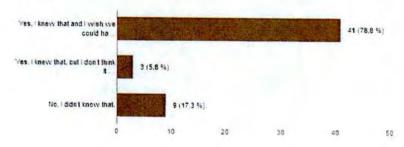


3. Did you know that you can bring back the products under Extended Producer Responsability (motor oil, antifreeze and filters, lamps containing mercury, paints, batteries and electronics) to a dedicated drop off point in 6 communities?

52 réponses

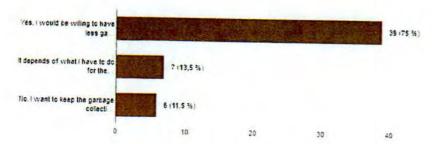


4. In the municipalities of southern Québec, waste is collected only once per week or once every other week. There is also a collection of recyclable materials and more and more municipalities have a collection of organic materials (compost). Did you know this information and do you think it could apply to Nunavik?

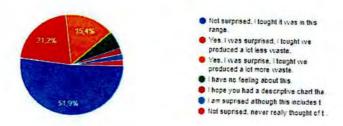


5. In most Northern Villages, garbage is collected 5 times a week, if other management methods were offered in order to reduce the quantity of garbage to dispose of (for example composting, collection of recyclable materials, bringing dangerous waste to a drop-off point); would you be ready to have less garbage collection (for example only once every two weeks)?

52 réponses

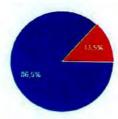


6. Concerning the waste inventory, are you surprised about the average waste production of 1.1 T/person/year?



7. According to the inventory, the majority of the residential and ICI (industries, businesses, institutions) waste are biodegradable and potentially compostable. Do you think sorting your organic waste (animal and vegetable residues, paper and cardboard) to produce compost should be part of the solution to improve waste management?

52 réponses



 Yes and I would be willing to participate if such a service is offered in my community.

 I am not sure I need to know more about what it involves for me.

• flo. I don't want to sort my waste.

8. The action plan presents a series of Implementation issues (funding, equipment and human resources, CRD residues and sea transportation). Are you aware of other issues that would complicate the implementation of the plan?

44 réponses

no

No

Yes

Lack of circular economy initiatives in Nunavik, Lack of supervision at the landfill regarding iCl's wastes.

Yes.

Funding

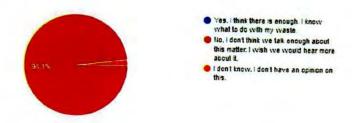
lack of public interest in protecting the environment

No.

Protection of the compost from animals eg stray dogs, raven etc. Find a way to make it easy and safe eg collection of compost in closed plastic containers

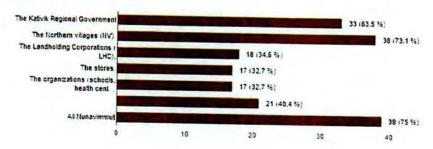
9. Do you think there is enough awareness raising activities about waste management in Nunavik?

52 réponses

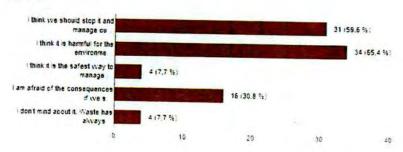


10. According to you, who is responsible of managing the waste in Nunavik? (you can check more then one choice)

52 réponses



What is your opinion about open-air burning of waste? (you can check more then one choice)



12. According to you, what are other possible ways to manage waste in Nunavik beside open-air burning?

48 réponses

recycle

The burying of waste or the incineration of non-biodegradable matters. The goal would be to avoid particulate matter and volatile organic compounds to be released. The plastic should have the priority to be burned in the incinerator. It would be interesting to look into using the incinerator to heat a building.

Recycling

Not too sure. It would be nice to see what is being done elsewhere in isolated areas.

I don't know how to call it, but when you capture the energy from burning. As well as recycling and composting.

We should recycle and ship back to industries in the south. Generating income for some peoples and getting paid for our recyclable waste instead of burning it. Compost and open more green houses.

Incinerator and Investing in recycling/ upcycling and Innovative solutions that focus on reusing our waste to produce something else. For example, plastic for making roads or creating new building material.

13. Do you have other comments or alternative ideas about open-air burning of waste? 42 réponses

No

It would be interesting to look into circular economy initiatives to value the plastic locally. Like making insulation for buildings with it.

I'm glad we're looking into this. I will support any initiative that will enable us to better manage our waste while protecting the environment.

What is the next step, will you update the population and what are your goals?

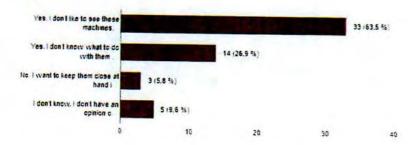
Create recycling plants in every village. Something that can produce byproducts that can be bought by industries in the south. \$\$\$

Teaching households about composting at home. Worm compost and also helping people build small greenhouses that they can grow food in and also make soil from their compost!

No.

14. Used vehicles and other motor mechines abandoned on the territory are a major source of contamination, Would you be willing to participate in a new procedure to manage them on a safest way?

52 réponses



15. Would you be willing to stop using single-use plastic bags to do your grocery?
52 réponses



16. Are you satisfied about the Draft Plan? Is there anything you would have like to add or modify t
the plan? Do you any other comments?
39 réponses
No
Yes
no
It would be interesting to install a waterproof basin under the dangerous waste and the mixed garbages. It would be interesting to have metal crushing installations in the landfills.
I'm satisfied. Nothing else to add.
It would be good if the draft plan had a community clean up portion to it. More awareness and community involvement needs to be done and also jobs for cleaning up should be made. Communities should have public garbage bins and people should be encouraged to use them.
yes
I'm excited to know things will change.



January 29, 2021

Élise Paquette
Acting Associate Deputy Minister for Wildlife and Parks
Québec Ministry of Forests, Wildlife, and Parks
5700, 4th Avenue West
Québec, QC
G1H 6R1

Subject: Comments on the future Québec Wildlife Policy

Dear Ms. Paquette,

The Kativik Environmental Advisory Committee (KEAC) was created pursuant to Section 23 of the James Bay and Northern Québec Agreement (JBNQA). It is a consultative body to responsible governments in matters relating to environmental and social protection in Nunavik. To this effect, it is the preferential and official forum for the Government of Canada, the Government of Québec, the Kativik Regional Government (KRG), the northern villages and the Naskapi Nation of Kawawachikamach when required.

Moreover, the environmental and social protection regime of Section 23 of the JBNQA aims to reduce the adverse effects of development activities carried in the Region" on both the Inuit and Naskapi populations and the wildlife resources (23.2.2). Furthermore, the protection of the hunting, fishing and trapping rights of Nunavik's indigenous population is ensured under Section 24 of the JBNQA and is considered under Section 23 where the environmental social protection regime is concerned. Given the broad scope of the future Québec *Wildlife Policy* and its implications for Section 23 of the JBNQA as well as Section 14 of the Northeastern Quebec Agreement (NEQA), the KEAC would like to bring its observations to your attention.

The KEAC welcomes the ambition of Quebec's first *Wildlife Policy* to protect against the depletion of biodiversity and to restore the majority of species in a precarious situation. In this regard, the KEAC hopes that the conservation and wildlife protection objectives set out in the proposed *Policy* will not be thwarted by those pursued in terms of exploitation. The decline of Nunavik's caribou populations is an example of the importance of having strong protection measures in place, as it is both a species at risk and an important resource for the region's indigenous inhabitants. The George

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River caribou herd has declined by more than 99% since 1993¹ and the Leaf River herd, by nearly 65% between 2000 and 2017². As such, the KEAC will monitor with interest the specific objectives and measures to be implemented in Nunavik to achieve this recovery target for species at risk. We encourage the MFFP to develop conservation tools and work in close collaboration with communities and regional entities.

The policy views wildlife as a driving force for socioeconomic development and wishes to facilitate hunting, fishing and trapping activities for enthusiasts as well as beginners and improving equitable access to the territory. For example, the policy targets to increase the portion of the Quebec population engaging in wildlife activities by at least 25% and objective 5.2 aims to "facilitate cohabitation in the territory". These formulations suggest an increase in the number of visitors to the region by hunting and fishing enthusiasts. In this regard, the KEAC wishes to recall that the JBNQA provides for a series of measures intended to secure the exercise of wildlife exploitation activities by the region's indigenous inhabitants. These subsistence rights are exclusive on reserved and selected lands (categories I and II), that is to say that non-Natives cannot practice hunting or fishing without authorization from the competent authorities (24.3.32). As for the right to trap, it is an exclusive right over the entire territory of Nunavik (categories I, II and III).

The JBNQA also introduces provisions applicable to the hunting and fishing regime of "non-Natives" (24.8). Category III lands are open to both Inuit, Naskapi, Cree and non-Natives. To avoid conflicts over the use of the territory's resources and to protect traditional subsistence activities, priority must be given to indigenous peoples. Thus, the JBNQA reserves for their exclusive use certain species of mammals, birds and fish (24.7.1) and grants them an exploitation priority by guaranteeing levels of exploitation equal to those, which existed at the time of the signature of the JBNQA.

The JBNQA also establishes co-management bodies to ensure the management of wildlife resources in Nunavik. In this regard, it is the Hunting, Fishing and Trapping Coordinating Committee that intervenes as a privileged body (24.4). Federal and provincial authorities must consult the latter before adopting measures that may infringe the rights of indigenous people over wildlife resources (24.4.23).

In addition, an increase in hunting and fishing by non-Natives in the region, may lead to a possible resurgence of outfitting camps. Although no new permits are currently being issued, Nunavik is still dealing with the legacy of abandoned and illegal outfitting camps as well as an overall lack of monitoring of outfitting activities in the region.

The KEAC understands that the consultation schedule on the future Québec Wildlife Policy has been affected by the COVID-19 pandemic, thereby limiting the participation of certain groups. We

¹ MFFP (2020). Nord-du-Québec – Inventaire du troupeau de caribous migrateurs de la rivière George. https://mffp.gouv.qc.ca/nord-quebec-inventaire-caribous-migrateurs-2020-10-15/

² MFFP (2018). Suivi démographique du troupeau de caribous migrateurs de la Rivière aux Feuilles. https://mffp.gouv.qc.ca/caribous-migrateurs-riviere-aux-feuilles-2018-12-13/

also recognize that the consultation document is very general, which makes it difficult to form an opinion and provide more in-depth feedback. The KEAC encourages the MFFP to continue its efforts and encourage the full participation of the Region's communities and organizations. The MFFP should also ensure that the Québec Wildlife Policy adequately responds to the specific context of Nunavik.

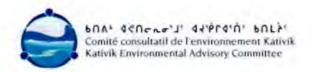
The KEAC wishes to be kept informed of the future development and implementation of the Québec Wildlife Policy.

Sincerely,

Paule Halley, Chairperson

CC:

Michèle Leduc-Lapierre, James Bay Advisory Committee on the Environment Miles Smart, Hunting, Fishing and Trapping Coordination Committee Noah Swappie, Naskapi Nation of Kawawachikamach Adamie Delisle-Alaku, Makivik Corporation



Kuujjuaq, le 29 janvier 2021

Élise Paquette Sous-ministre associée à la Faune et aux Parcs par intérim Ministère des Forêts, de la Faune et des Parcs du Québec 5700, 4^e Avenue Ouest Québec (Québec) G1H 6R1

Objet : Commentaires sur la future Politique Faune

Madame la sous-ministre associée,

Le Comité consultatif de l'environnement Kativik (CCEK) a été créé en vertu du chapitre 23 de la Convention de la Baie-James et du Nord québécois (CBJNQ). Le CCEK est un organisme consultatif en matière de protection de l'environnement et du milieu social du Nunavik auprès des gouvernements responsables. En cette matière, il est l'intermédiaire privilégié et officiel des gouvernements du Canada et du Québec ainsi que de l'Administration régionale Kativik (ARK), des corporations municipales nordiques et de la Nation naskapie de Kawawachikamach, lorsque requis.

Plus particulièrement, le régime de protection de l'environnement et du milieu social du chapitre 23 de la CBJNQ poursuit l'objectif de « réduire le plus possible les répercussions indésirables du développement effectué dans la Région » sur la population inuite et naskapie et sur les ressources fauniques (23.2.2). Soulignons également que « la protection des droits et garanties établis en faveur des autochtones en vertu du chapitre 24 » en matière de chasse, de pêche et de trappage au nord du 55e parallèle est un autre des principes directeurs énoncés au chapitre 23 de la CBJNQ. Étant donné la portée large de la future *Politique Faune* et ses interactions avec le chapitre 23 de la CBJNQ et le chapitre 14 de la Convention du Nord-Est québécois (CNEQ), le CCEK souhaite porter ses observations à votre attention.

Le CCEK salue l'ambition de la première *Politique Faune* du Québec de lutter contre l'érosion de la biodiversité faunique et de rétablir la majorité des espèces en situation précaire. À cet égard, le

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CCEK espère que les objectifs de conservation et de protection de la faune énoncés dans la *Politique Faune* du Québec ne seront pas contrecarrés par ceux poursuivis en matière d'exploitation. Le déclin des populations de caribous du Nunavik est un exemple de l'importance de mettre en place des mesures de protection robustes, car il s'agit à la fois d'une espèce en péril et d'une ressource importante pour les habitants autochtones de la région. Le troupeau de caribous de la rivière George a décliné de plus de 99 % depuis 1993¹ et celui de la rivière aux Feuilles d'environ 65% entre 2000 et 2017². Nous suivrons avec intérêts les objectifs spécifiques et les mesures qui seront mis en place au Nunavik pour atteindre cette cible de rétablissement des espèces en situation précaire et nous encourageons le ministère des Forêts, de la Faune et de Parcs (MFFP) à les développer en étroite collaboration avec les organisations régionales concernées.

La *Politique Faune* considère la faune comme un moteur de développement socio-économique. Elle souhaite faciliter la pratique des activités de chasse, de pêche et de piégeage pour les adeptes et les recrues et favoriser un accès équitable au territoire. Par exemple, une de ses cibles est d'augmenter d'au moins 25% la proportion de la population québécoise pratiquant des activités fauniques. L'objectif 5.2 vise quant à lui à « favoriser la cohabitation sur le territoire ». Ces formulations laissent présager une augmentation de la fréquentation de la région par des amateurs de chasse et pêche. À ce sujet, le CCEK souhaite rappeler que la CBJNQ prévoit une série de mesures destinées à sécuriser l'exercice des activités d'exploitation faunique des populations autochtones de la région. Tout d'abord, leur droit d'exploitation est exclusif sur les terres réservées et sélectionnées (catégories I et II), c'est-à-dire que les non-autochtones ne peuvent y exercer la chasse ni la pêche sans autorisation des autorités compétentes (24.3.32). Quant au droit de piéger, il s'agit d'un droit exclusif sur l'ensemble du territoire du Nunavik (catégories I, II et III).

La CBJNQ introduit également des dispositions applicables au régime de chasse et de pêche des « non-autochtones » (24.8). Les terres appartenant à la catégorie III sont ouvertes tant aux autochtones qu'aux non-autochtones. Pour éviter les conflits d'usage des ressources du territoire et protéger les activités de subsistance traditionnelles des autochtones, des priorités leur sont accordées. Ainsi, la CBJNQ réserve à leur usage exclusif certaines espèces de mammifères, d'oiseaux et de poissons (24.7.1) et leur accorde une priorité d'exploitation en garantissant des niveaux d'exploitation égaux à ceux qui existaient au moment de la signature de la CBJNQ.

La CBJNQ a également mis en place des instances de cogestion pour assurer l'administration des ressources fauniques au Nunavik. En la matière, c'est le Comité conjoint de chasse, de pêche et de piégeage qui intervient à titre d'organisme privilégié (24.4). Les autorités fédérales et provinciales

¹ MFFP (2020). Nord-du-Québec – Inventaire du troupeau de caribous migrateurs de la rivière George. https://mffp.gouv.qc.ca/nord-quebec-inventaire-caribous-migrateurs-2020-10-15/

² MFFP (2018). Suivi démographique du troupeau de caribous migrateurs de la Rivière aux Feuilles. https://mffp.gouv.qc.ca/caribous-migrateurs-riviere-aux-feuilles-2018-12-13/

doivent consulter celui-ci avant d'adopter des mesures susceptibles de porter atteinte aux droits des autochtones sur les ressources fauniques (24.4.23).

De surcroît, Le CCEK craint qu'une augmentation de la chasse et de la pêche par les nonautochtones dans la région conduise à une résurgence des pourvoiries. Bien qu'aucun nouveau permis ne soit actuellement délivré, le Nunavik est toujours aux prises avec l'héritage de pourvoiries abandonnées et illégales ainsi qu'à un manque général de surveillance de ce type d'activité dans la région.

Nous comprenons que le calendrier de consultation sur la future *Politique Faune* a été bousculé par la pandémie de COVID-19, privant ainsi certains groupes d'une occasion d'y participer pleinement. Nous avons également noté que le document soumis à la présente consultation fournit peu d'informations spécifiques, ce qui rend difficile la tâche de se forger une opinion sur ce projet et de fournir des commentaires précis. Le CCEK encourage le MFFP à poursuivre ses efforts de consultation pour s'assurer de la participation pleine et entière des organisations concernées et de faire en sorte que la *Politique Faune* réponde adéquatement aux enjeux spécifiques du Nunavik. Le CCEK souhaite être tenu informé des prochaines étapes du développement et de la mise en œuvre de la *Politique Faune*.

Nous vous prions de recevoir, Madame la sous-ministre associée, nos plus respectueuses salutations.

Paule Halley, présidente

CC:

Michèle Leduc-Lapierre, Comité consultatif pour l'environnement de la Baie-James Miles Smart, Comité conjoint de chasse, de pêche et de piégeage Noah Swappie, Nation Naskapie de Kawawachikamach Adamie Delisle-Alaku, Société Makivik



January 26, 2021

Sonia Gagné President-Director General RECYC-Québec 300, Saint-Paul Street, Office 411 Québec, QC, G1K 7R1

SUBJECT: Invitation to discuss waste management strategies for the Nunavik region

Dear Ms. Gagné,

The Kativik Environmental Advisory Committee (KEAC) was created pursuant to Section 23 of the James Bay and Northern Québec Agreement (JBNQA) and is governed by the Environment Quality Act (EQA) and the James Bay and Northern Québec Native Claims Settlement Act. The KEAC is a consultative body to responsible governments in matters relating to environmental and social protection in Nunavik. It is therefore the preferential and official forum for the Government of Canada, the Government of Québec, the Kativik Regional Government (KRG) and the northern villages.

The Nunavik Residual Materials Management Working Group was created under the direction of the Ministry of the Environment and the Fight Against Climate Change (MELCC) and is mandated to facilitate communication between regional stakeholders and government entities on matters related to waste management in Nunavik. The Working Group is also responsible for identifying potential waste management strategies and practices tailored to the realities of the region as well as identifying the objectives set out in the 2019-2024 Action Plan under the Québec Residual Materials Management Policy to be implemented in the region. As you may be aware, the membership of the Working Group consists of representatives of the KEAC, the KRG, MELCC and RECYC-Québec.

In September 2019, members of the Working Group visited the communities of Kuujjuaq and Kangirsuk in order to better understand the realities of waste management in the northern context. Following this meeting, the KEAC, in collaboration with the KRG, developed an overview of current regional waste management practices and future initiatives as a result of the implementation of the 2015-2020 Nunavik Residual Materials Management Plan. This was sent to the Federal and Provincial Administrators of Section 23 of the JBNQA in June 2020 to which a response was received from the latter in August 2020. In his response, included for reference, the Provincial Administrator recognizes the challenges associated with waste management in Nunavik as well as the importance of maintaining an open dialogue between regional entities, with the Québec Government and RECYC- Québec.

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Furthermore, the KEAC and the KRG presently participate as observers on both the joint committee for the modernization of the beverage deposit system and the Working Group #4 concerning the modernization of the selective collection system. This has provided us with the opportunity to spread awareness and communicate concerns to the Quebec government and industrial and private sector representatives on the current situation faced by Nunavik communities concerning beverage container collecting and recycling. The KEAC understands that potential bilateral discussions may stem from these groups and lead to a more centralized dialogue.

In the spirit of maintaining a meaningful conversation on matters relating to waste management in Nunavik and in accordance with RECYC-QUÉBEC's principal of collaboration, the KEAC would like to invite you or one of your representatives to our 167th meeting scheduled for March 17 and 18, 2021. This invitation will also be extended to representatives of the KRG to attend this virtual meeting.

It is our intention that this meeting will serve to clarify RECYC-Québec's objectives for developing waste management strategies for the region and how these will be implemented in tandem with the Quebec Government's current and projected waste management policies and legislation. We would also like to better understand how RECYC-Québec intends to allocate financial resources to isolated northern regions and better adapt its program implementation strategies in the context of the recent proposed amendments to the EQA that touch upon beverage container collection and recycling, extended producer responsibility, and the modernized selective collection system. Furthermore, other topics of interest include funding programs for organic waste management initiatives as well as access to information.

We thank you for considering our invitation and should you be available or require further information please contact our secretariat at the coordinates below.

Respectfully,

Paule Halley President, KEAC

Att. 1

cc. Marc Croteau, Deputy Minister, MELCC and Provincial Administrator of JBNQA
Markusi Qisiiq, Director, Renewable Resources Environment, Lands and Parks Department,
Kativik Regional Government

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Respectfully,

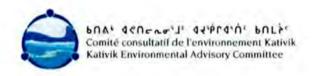
Paule Halley President, KEAC

Att. 1

cc. Marc Croteau, Deputy Minister, MELCC and Provincial Administrator of JBNQA
Markusi Qisiiq, Director, Renewable Resources Environment, Lands and Parks Department,
Kativik Regional Government

KEAC Secretariat

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Kuujjuaq, le 18 janvier 2021

Monsieur Adamie Delisle-Alaku Vice-président Service de l'environnement, de la faune et de la recherche Société Makivik C. P. 179 Kuuijuag (Québec) J0M 1C0

OBJET: Invitation à la 167e réunion du CCEK

Monsieur,

Au nom du Comité consultatif de l'environnement Kativik (CCEK), nous tenons d'abord à remercier la Société Makivik pour l'intérêt qu'elle porte à nos activités et à notre mandat. Nous aimerions également remercier vos représentants qui ont rencontré les membres du CCEK le 3 décembre 2020 pour discuter de votre demande d'avoir un observateur permanent de la Société Makivik aux réunions ordinaires du CCEK. Lors de cette rencontre, les membres ont présenté le mandat et les secteurs d'activité du CCEK à vos représentants et ont discuté avec eux de questions revêtant un intérêt particulier pour la Société Makivik ainsi que de dossiers sur lesquels nous collaborons actuellement et pour lesquels nous avons un intérêt commun.

Suivant une discussion concernant votre demande d'avoir un observateur permanent de la Société Makivik aux réunions ordinaires du CCEK, les membres ont conclu qu'un tel statut ne pouvait être accordé. Le CCEK est toutefois disposé à accueillir un observateur à ses réunions ordinaires lorsque les sujets abordés revêtent un intérêt particulier pour la Société Makivik et à vous rencontrer périodiquement afin d'entendre vos préoccupations environnementales.

Le CCEK tient à poursuivre ses échanges et ses collaborations avec la Société Makivik et vous invite à lui transmettre toute question que vous pourriez avoir concernant ses activités. À cet effet, vous pouvez trouver des renseignements utiles, incluant les ordres du jour et les procès-verbaux des réunions, sur le site Web du CCEK. Enfin, nous aimerions vous inviter à notre 167e réunion qui se tiendra les 17 et 18 mars 2021 par vidéoconférence et vous transmettrons l'ordre du jour dès qu'il sera prêt afin que vous puissiez déterminer à l'avance les sujets qui pourraient revêtir un intérêt particulier pour la Société Makivik. Si vous désirez assister à la réunion, veuillez confirmer votre disponibilité à notre secrétariat.

Veuillez agréer, Monsieur, l'expression de nos sentiments les meilleurs.

La présidente,

Paule Halley

Secrétariat du CCEK
C. P. 930, Kuujjuaq (Québec) J0M 1C0
Tél.: 819-964-2961, poste. 2287
Fax: 819-964-0694
Courriel: bpatenaude@krg.ca



January 18, 2021

Adamie Delisle-Alaku
Executive Vice-president
Department of Environment, Wildlife, and Research
Makivik Corporation
P.O. Box 179
Kuujjuaq, QC
JOM 1C0

SUBJECT: Invitation to the 167th meeting of the KEAC

Dear Mr. Delisle-Alaku,

Firstly, on behalf of the Kativik Environmental Advisory Committee (KEAC), I would like to thank the Makivik Corporation for its interest in our activities and mandate. I would also like to thank your representatives for meeting with the members on December 3, 2020 to discuss your request to have an observer attend the committee's annual meetings on a permanent basis. At this meeting, the members presented the KEAC's mandate and its sectors of activity to your representatives and exchanged with them on issues of particular concern to the Makivik Corporation as well as those on which we are presently collaborating and share a common interest.

Following a discussion concerning your request to have a permanent observer seat on the KEAC, the members have concluded that this status cannot be granted. The KEAC does however remain open to welcoming an observer to be present at our regular meetings when subjects of specific interest to the Makivik Corporation are being discussed and to meet with you periodically to hear your environmental concerns.

The KEAC is open to continuing exchanges and collaborations with the Makivik Corporation and we invite you to contact us should you have any questions concerning our activities. In this regard, you can find useful information, including meeting minutes and agendas on the KEAC's website. We would also like to invite you to our 167th meeting scheduled for March 17 and 18, 2021 by videoconference and will provide you with a copy of the agenda when available such that you could identify the items of particular interest to you in advance. Should you be interested, please confirm your availability with our Secretariat.

Respectfully,

Paule Halley Chairperson

KEAC Secretariat
P.O. Box 930, Kuujjuaq QC J0M 1C0
Tel.: 819-964-2961, ext. 2287
Fax: 819-964-0694
Email: bpatenaude@krg.ca



PAR COURRIEL

Québec, le 18 janvier 2021



Monsieur Michael Barrett
Comité consultatif de l'environnement Kativik
Case postale 930
Kuujjuaq (Québec) JOM 1C0
mbarrett@krg.ca

INFORMER

Monsieur,

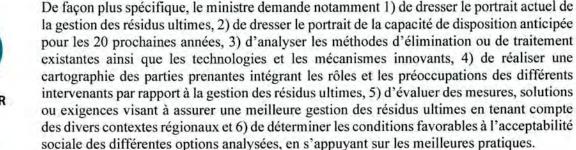


CONSULTER

Le 17 décembre dernier, le ministre de l'Environnement et de la Lutte contre les changements climatiques, M. Benoit Charette, a confié au Bureau d'audiences publiques sur l'environnement (BAPE) un mandat d'enquête et d'audience publique afin d'effectuer une réflexion approfondie sur la disposition des résidus ultimes sur l'ensemble du territoire québécois. Ce mandat d'enquête débutera le 8 mars prochain.



ENQUÊTER





Le ministre demande également que le mandat porte sur l'ensemble du territoire québécois, incluant les territoires visés aux chapitres 22 et 23 de la Convention de la Baie-James et du Nord québécois et au chapitre 14 de la Convention du Nord-Est québécois et au chapitre II de la LQE.

AVISER

Pour réaliser ce mandat, j'ai formé une commission d'enquête dont la présidence a été confiée à M. Joseph Zayed, à qui j'ai adjoint deux commissaires, M^{me} Julie Forget et M. Pierre Renaud.

140, Grande Allée Est, bureau 650 Québec (Québec) G1R 5N6 Tél. : 418 643-7447 Sans frais : 1 800 463-4732 www.bape.gouv.qc.ca facebook.com/BAPEquebec Avant d'amorcer officiellement ses travaux, la commission d'enquête souhaiterait échanger avec vous, avec votre organisation et avec des représentants du Comité consultatif pour l'environnement de la Baie James dans le but d'établir les modalités de consultation publique propres à chacun de vos territoires et de définir votre participation aux travaux. À cet effet, la commission pourrait vous rencontrer le mardi 9 février en après-midi ou à une autre date qui vous conviendrait.

Au cours des prochains jours, M^{me} Karine Jean, analyste au sein de la commission d'enquête, communiquera avec votre secrétaire exécutif, M. Benjamin Patenaude, pour convenir des suites. Si vous le souhaitez, vous pouvez bien sûr communiquer directement avec elle aux numéros de téléphone suivants : 581 925-0684 ou (sans frais) 1 800 463-4732.

Considérant la situation actuelle entourant la COVID-19 et les mesures particulières applicables, notez que ce mandat pourrait se tenir uniquement en mode numérique tel que le permettent nos Règles de procédure temporaires pour la période durant laquelle est déclaré l'état d'urgence sanitaire pour protéger la santé de la population.

Veuillez agréer, Monsieur, l'expression de mes sentiments les meilleurs.

Le président,

Philippe Bourke

c. c. M. Benjamin Patenaude, secrétaire exécutif

p. j.: Lettre mandat