

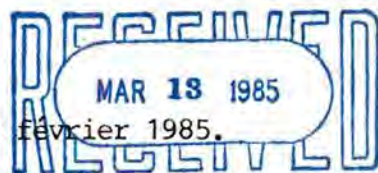
Classement CCEK

Titre Déplacement des carcasses de caribou le long de la rivière Caniapiscau

Type Dossiers Environnementaux

Date D'ouverture 1984

Notes 28 Janvier 1985: Lettre du Gouvernement du Québec- Ministère de l'environnement; Déplacement des carcasses de caribou le long de la rivière Caniapiscau; Project Respecting the Clean-up and removal of Caribou Carcasses
31 Janvier 1985: :Lettre de la Commission de la Qualité de l'environnement Kativik; Déplacement des carcasses de caribou le long de la rivière Caniapiscau; recommandations
29 Janvier 1985: Lettre de Labrador Inuit Association; Brief of the Labrador Inuit Association- Caniapiscau river caribou disaster septembre 1984
8 Février 1985:Lettre du Gouvernement du Québec- Ministère de l'environnement; Déplacement des carcasses de caribou le long de la rivière Caniapiscau; Proposition de modification de la Loi
13 Février 1985: Lettre de la Commission de la Qualité de l'environnement Kativik; Déplacement des carcasses de caribou le long de la rivière Caniapiscau; Accord avec les recommandations de la Commission
22 Février 1985: Lettre du Gouvernement du Québec- Ministère de l'environnement; Déplacement des carcasses de caribou le long de la rivière Caniapiscau; Projet concernant l'enlèvement et le nettoyage des carcasses de caribou
26 Février 1985: Lettre de la Commission de la Qualité de l'environnement Kativik; Déplacement des carcasses de caribou le long de la rivière Caniapiscau
28 Février 1985; Lettre du Gouvernement du Québec- Ministère de l'environnement; Décision du Sous-Ministre de l'environnement



Radisson, le 28 février 1985.

Tuktu Assistance Corporation,
Kuujjuaq,
Qc
J0M 1C0

"LA REQUERANTE"

A l'attention de: Monsieur Willie Watt, secrétaire-trésorier.

DECISION DU SOUS-MINISTRE DE L'ENVIRONNEMENT

(Chapitre I de L.R.Q., c.Q-2)

Monsieur,

Le 22 février 1985, conformément à l'article 22 de la loi sur la qualité de l'environnement (L.R.Q., c.Q-2), la requérante a soumis au sous-ministre de l'Environnement une demande de certificat d'autorisation concernant le déplacement des carcasses de caribous morts lors d'une noyage massive dans la région de Kuujjuaq au Nouveau-Québec.

Le 27 février 1985, le projet de la requérante a fait l'objet d'une attestation de non-assujettissement du sous-ministre de l'Environnement après avoir été soumis à l'application de la procédure d'évaluation et d'examen des impacts sur l'environnement et le milieu social à la section II du chapitre II de la loi sur la qualité de l'environnement.

Le projet soumis à notre attention consiste essentiellement à déplacer les carcasses de caribous ci-haut mentionnées suivant les données fournies par la requérante en date des 25 janvier et 22 février derniers et suivant les normes admises par notre ministère.

Pour ces motifs, le sous-ministre de l'Environnement, en vertu des pouvoirs qui lui sont conférés par l'article 22 du chapitre I de la loi sur la qualité de l'environnement autorise ces travaux.

.../2.

Ceux-ci peuvent être entrepris dès maintenant et devront être réalisés selon les coordonnées décrites dans la demande de la requérante à la page 9, notamment:

- "a) that all caribou carcasses shall be shipped out of Kuujjuaq by April 30, 1985 and that a form of financial guarantee assuring the foregoing shall be entered into;
- b) that where a particular carcass dump site is located and cleaned-up, all carcasses at that dump site will be removed, the intention being to fully clean-up a given number of such sites rather than to partially clear a larger number;
- c) that all temporary structures, furnishings and equipment, including oil barrels, shall be removed from the region at the end of the Project and, in any case, by May 15, 1985, and
- d) that the sanitary condition of the territory of the Northern Village Corporation of Kuujjuaq shall be maintained and that any aspect of the Project relating to warehousing, cutting or transport of carcasses as well as the disposal of any part of the carcasses not used, will be carried out in conformity with the laws and regulations of the Ministère de l'Environnement as well as with other applicable laws and regulations."

La présente autorisation ne dispense nullement la requérante de son obligation de se conformer à toute autre loi ou règlement pouvant s'appliquer à la réalisation de son projet.

Le sous-ministre de l'Environnement,

par: 

Monsieur Jean-Paul Noël, directeur régional par intérim, direction régionale du Nouveau-Québec, dûment autorisé à cette fin par le décret 921-80 adopté le 26 mars 1980 et paru dans la Gazette officielle du Québec le 23 avril 1980.

- c.c. - Administration régionale Kativik,
A l'attention de Monsieur Joseph Keleutak, président,
- Ministère de l'Environnement,
A l'attention de Monsieur Pierre-B. Meunier, sous-ministre,
 - La Commission de la qualité de l'environnement Kativik,
A l'attention de Monsieur Hervé Chatagnier, secrétaire.
 - Municipalité de Kuujjuaq,
A l'attention de Monsieur Johnny Watt, maire.
 - Ministère de l'Agriculture, des Pêcheries et de l'Alimentation,
A l'attention de Monsieur Laurier Bernier, directeur,
Direction de l'inspection des produits carnés.
 - Ministère du Loisir, de la Chasse et de la Pêche,
A l'attention de Monsieur Raymond Bornais, directeur régional.

Gouvernement du Québec
Ministère
de l'Environnement



Bureau du sous-ministre

Sainte-Foy, le 27 février 1985

Monsieur Willie Watt
Secrétaire-trésorier
Tuktu Assistance Corporation
Kuujjuaq, QC J0H 1C0

OBJET: Déplacement des carcasses de caribous le long
de la rivière Caniapiscou
Notre dossier: 000-BJ342-10

Monsieur,

Pour donner suite aux lettres que vous m'avez adressées le 25 janvier et le 22 février derniers dans le cadre de la demande d'autorisation du projet mentionné en titre, et conformément à l'article 192 de la Loi sur la qualité de l'environnement, je vous informe que la Commission de la qualité de l'environnement a décidé de soustraire l'étude de ce projet de la procédure d'évaluation et d'examen des impacts sur l'environnement et le milieu social prévue au chapitre II de la Loi sur la qualité de l'environnement.

La réalisation du projet devra être conforme aux coordonnées que vous nous avez soumises notamment en ce qui concerne le versement de la dernière tranche de 40 000 \$ de l'aide financière de Emploi et Immigration Canada à la Société Tuktu, lequel versement suivra une dernière inspection des travaux à la satisfaction du directeur régional du ministère.

Je vous invite d'ailleurs à entrer en communication avec le directeur régional par intérim du ministère à Radisson, monsieur Jean-Paul Noël (Radisson, 638-8495), qui assurera le contrôle des travaux.

Veillez agréer, Monsieur, l'expression de mes meilleurs sentiments.

PIERRE B. MEUNIER
Sous-ministre

c.c.: Peter Jacobs, président de la CQEK
A.R.K., a/s du secrétaire ✓
Jean-Paul Noël, directeur régional par intérim (10)

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COMMISSION DE LA QUALITE DE L'ENVIRONNEMENT KATIVIK ENVIRONMENTAL QUALITY COMMISSION

SECRETARIAT - C.P. 9, KUUJJUAQ, QUEBEC, J0M 1C0

TEL.: (819) 964-2941

Le 26 février 1985

Monsieur Pierre B. Meunier
Sous-ministre
Ministère de l'Environnement
3900, rue Marly
6e étage
Sainte-Foy (Québec)
GLX 2E4

OBJET: Déplacement des carcasses de caribou le long de la rivière Canlapiscau

Monsieur le Sous-ministre,

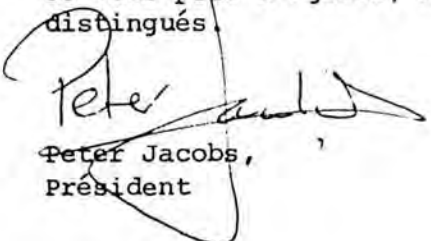
Nous avons bien reçu votre demande en date du 22 février concernant le besoin d'étude des impacts du projet mentionné en titre. Considérant l'urgence du dossier, la décision de la Commission à ce sujet fut prise à la suite de consultations des membres de la Commission par appel téléphonique.

Comme vous le savez, la Commission a fait l'analyse des informations préliminaires de ce projet lors de sa réunion du 28 et 29 janvier dernier. A la suite de cette analyse, la Commission a pu, sur la base des renseignements contenus dans le document du promoteur, formuler une série de recommandations aux conditions qui pourraient faire partie de l'autorisation de procéder à la réalisation du projet. Ces conditions se trouvent dans la lettre que je vous avais adressée le 31 janvier dernier.

En réponse à votre présente demande et conformément à l'article 192 de la Loi sur la qualité de l'environnement, la Commission a décidé de ne pas assujettir le projet à la procédure d'évaluation et d'examen.

Cependant, nous recommandons au ministère d'assurer l'application des recommandations que nous vous avons suggérée dans notre lettre du 31 janvier dernier et qui sont incorporées dans les renseignements du promoteur en date du 22 février. L'application de ses recommandations par le promoteur permettra, nous le croyons, que la réalisation du projet se fasse sans conséquences majeures sur l'environnement et le milieu social.

Je vous prie d'agréer, Monsieur le Sous-ministre, l'expression de mes sentiments distingués.



Peter Jacobs,
Président

Bureau du sous-ministre

Sainte-Foy, le 22 février 1985

Monsieur Peter Jacobs
Président de la Commission de la
qualité de l'environnement Kativik
Université de Montréal
5829, rue Darlington
Montréal, QC H3T 1T2

OBJET: Déplacement des carcasses de caribous le long
de la rivière Caniapiscau
Notre dossier: 000-BJ342-10

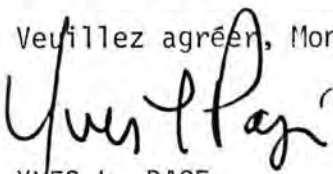
Monsieur,

Les renseignements préliminaires du projet mentionné en titre en vue de son éventuelle autorisation ont été soumis à la Commission par le ministère le 28 janvier dernier et celle-ci a fait connaître son point de vue sur le projet au sous-ministre, le 31 janvier suivant.

Dans une lettre adressée au sous-ministre aujourd'hui même, lettre dont je vous joins copie, le promoteur, la Tuktu Assistance Corporation, indique certaines précisions et modifications au projet initialement soumis. Je me permets de transmettre également copie de cette lettre aux autres membres de la Commission ainsi qu'à son secrétaire.

Compte tenu que le projet, tel que modifié, n'est pas visé aux annexes A et B de la Loi sur la qualité de l'environnement, je vous demande de faire parvenir au sous-ministre dans les meilleurs délais, la décision de la Commission concernant l'opportunité d'assujettir ou non l'étude de ce projet à la procédure d'évaluation et d'examen des impacts, et ce, conformément à l'article 192 de la Loi sur la qualité de l'environnement.

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


YVES L. PAGE

c.c.: Pierre B. Meunier, sous-ministre
A.R.K., a/s du secrétaire et 1 copie de la lettre du 85-02-22
Jean-Paul Noël, dir. rég. par intérim (10) et 1 copie de la
lettre du 85-02-22

TUKTU ASSISTANCE CORPORATION
KUUJJUAQ, QUEBEC

February 22, 1985

Mr. Pierre B. Meunier
Deputy Minister
Ministère de l'Environnement
3900 rue Marly
61ème étage
Québec, Québec

Re: Project respecting the Clean-Up
and Removal of Caribou Carcasses
(the "Project")

Dear Mr. Meunier:

We refer to our letter of January 25, 1985 and to subsequent discussions with representatives from your office concerning the abovementioned Project. On the basis of those discussions, as well as those with representatives of the Ministère de l'Agriculture, des Pêcheries et de l'Alimentation and the Ministère du Loisir, de la Chasse et de la Pêche, we are re-submitting the abovementioned Project, amended as hereafter set forth, with a view to obtaining such certificates or authorizations as may be required from the Ministère de l'Environnement.

. . . /2

The general description and scope of the Project remains essentially as described in our abovementioned letter. We would, however, draw your attention to the following particulars and modifications:

1. Disposal of carcasses

The Project does not involve the disposal of carcasses in the North, either at the disaster site or at Kuujjuaq. More particularly, the carcasses will not be cut into pieces either at the said site or at Kuujjuaq. Carcasses shipped from the site to Kuujjuaq and from Kuujjuaq to Montreal will be shipped whole. Accordingly, there will be no carcass residue to dispose of either at the site or at Kuujjuaq.

The original Project description, which foresaw the possibility of shipping the hindquarters of carcasses, has been modified. The "preparation" of carcasses for shipment is meant to refer to the collection and sorting into piles of such carcasses.

2. Campsites and Transport of Carcasses to Kuujjuaq

We had indicated the probable establishment of five work camps. In fact, two work camps have been established at sites 2 and 3 as shown on the map attached as Schedule "A" to the original Project description. A modified map is attached. Initially, there will be approximately 55 employees at each of the abovementioned camps. The work force at each camp will be divided into smaller work parties at each camp, the numbers of which shall depend on the number and size of dump sites located. The overall number of employees working at the disaster site will be reduced by approximately ten to fifteen employees during later phases of the Project when operations shift from locating carcasses at the site to the transporting and shipping of carcasses from Kuujjuaq to Montreal.

The workers will be billeted at the disaster site in winter tents normally used by Inuit for such purposes. There will be no permanent or semi-permanent installations or structures at the site of the camps or, more generally, at the site of the disaster.

As previously indicated, the transport of carcasses from the site to Kuujjuaq will be by wooden sleds constructed in Kuujjuaq for these purposes, pulled by

snowmobiles. The sleds are designed to carry between six and ten carcasses. Transportation will be carried out by twenty (20) alpine snowmobiles. No carcasses will be dragged behind snowmobiles. Any carcasses which, by inadvertance, fall off sleds during transport will be recovered by drivers of subsequent shipments; no carcasses will be left on the river.

The transportation route from the site to Kuujjuaq will be down a short stretch of the Caniapiscou River and then down the Koksoak River, travelling by snowmobile trail, either down mid-river or along the shoreline, depending on ice conditions.

The transportation route from the disaster site to Kuujjuaq is approximately seventy (70) miles. The same route will be used for the duration of the Project.

Smaller snowmobile trails, all in deep snow, have been established to interconnect the two workcamps, the various carcass dump sites and the river. The smaller trails will all be located within the area shown on the map earlier tabled as Schedule "A". Insofar as some of the carcass dump sites were located in wooded areas, a minimum of wood clearing will be involved. In such event, the trees felled will be fully used as fire wood and tent floors.

None of the abovementioned trails (in particular, the main transport route) will remain after completion of the Project.

3. Stockpiles

In the original Project description, it was indicated that there would be a number of stockpile areas at the disaster site. It has now been determined that there will be two stockpile areas in the immediate vicinity of the two work camps. If required, measures will be taken to ensure that any scavenging animals are kept away from the stockpiles.

Carcasses will be loaded onto sleds at each of the stockpile areas and taken down to the river for transport to Kuujuuaq. In order to control the flow of carcasses to the river transportation route and, in particular, to avoid any possibility of carcasses being relocated near the river and subsequently not being transported, the proponent will not establish further stockpiles.

At Kuujjuaq, it is proposed to transport the carcasses to an area located approximately one-quarter mile from Kuujjuaq airport. The stockpile area will be located on land and not on the river. The site chosen is located approximately 1.5 miles from the Community and has been approved by the Northern Village Corporation of Kuujjuaq. The municipality has undertaken to keep the road from the stockpile area to the airport cleared of snow. The carcasses to be shipped to Montreal on any given day will be taken from the said area just before scheduled shipment to pallets which will be located near the Nordair storage facility at the airport. The route between the stockpile area and the airport is located at least than 1.5 miles from the Community.

4. Shipments

By-products (limited to antlers, hoofs and tails) will be similarly shipped from the site to Kuujjuaq and eventually transported to Montreal. In connection with transport, first priority, however, is the transportation of carcasses. The by-products, which will be clean of caribou flesh, will be put into fish boxes or camboles (larger containers) and, until shipped, stored in sheds or community freezers. The marketing of by-products was referred to at paragraph (f) under the heading "Nature and Scope of the Project" in the original Project description.

As indicated above, the carcasses will be loaded onto pallets and shipped by air from Kuujjuaq to Montreal. As indicated in the original Project description, shipments will be on the basis of available space and at the rate of between 3,000 and 22,000 pounds per flight.

The rate of delivery of carcasses to Kuujjuaq will be controlled so as to ensure that carcasses brought to Kuujjuaq are transported within the shortest possible delay. Deliveries will be scheduled with a view to shipping carcasses within 4 days of their delivery to Kuujjuaq. In the event that, for reasons beyond the control of the proponent, carcasses remain stockpiled in Kuujjuaq for up to 7 days, deliveries will be delayed until the backlog is cleared. As the Project nears the scheduled date for completion of transport, any stockpile of unshipped carcasses will be reduced to a minimum so as to ensure compliance with the April 30th deadline. The proponent will ensure the control of deliveries by direct communication by radio to the campsites and through the shipment drivers. Of the proponent's 110 employees, it is foreseen that at least 10 to 15 will eventually be involved in the actual loading operations at Kuujjuaq.

5. Disposal of Carcasses

Arrangements for the disposal of the carcasses in Montreal are as described in the original Project description and have been further delineated by the Ministère de l'Agriculture. In that connection, we understand that you are now aware of the conditional authorization we received from the Ministère de l'Agriculture on February 18, 1985 and of the conditions governing the handling of the carcasses mentioned therein. We had previously discussed the proposed conditions with the Ministère de l'Agriculture and have indicated that we shall comply with same.

6. Conclusions

We have discussed with your representatives the contents of the recommendations or directives contained in the letter from the Kativik Environmental Quality Commission under signature of the Chairman, Mr. Peter Jacobs, dated January 28, 1985.

- 9 -

We have indicated to your representatives our agreement with the following conditions, namely,

(a) that all caribou carcasses shall be shipped out of Kuujjuaq by April 30, 1985 and that a form of financial guarantee assuring the foregoing shall be entered into;

(b) that where a particular carcass dump site is located and cleaned-up, all carcasses at that dump site will be removed, the intention being to fully clean-up a given number of such sites rather than to partially clear a larger number;

(c) that all temporary structures, furnishings and equipment, including oil barrels, shall be removed from the region at the end of the Project and, in any case, by May 15, 1985, and

(d) that the sanitary condition of the territory of the Northern Village Corporation of Kuujjuaq shall be maintained and that any aspect of the Project relating to warehousing, cutting or transport of carcasses as well as the disposal of any part of the carcasses not used, will be carried out in conformity with the laws and regulations of the Ministère de l'Environnement as well as with other applicable laws and regulations.

As indicated above, we have undertaken to have all carcasses which have been delivered to Kuujjuaq shipped out of Kuujjuaq by April 30, 1985. We would suggest, however, that any authorizations should include the flexibility to extend that delay if conditions warrant, on a day-to-day basis, with the permission of the responsible MAPAQ and Environnement Quebec officials. In such event, we would undertake to maintain no more than a daily stockpile of carcasses.

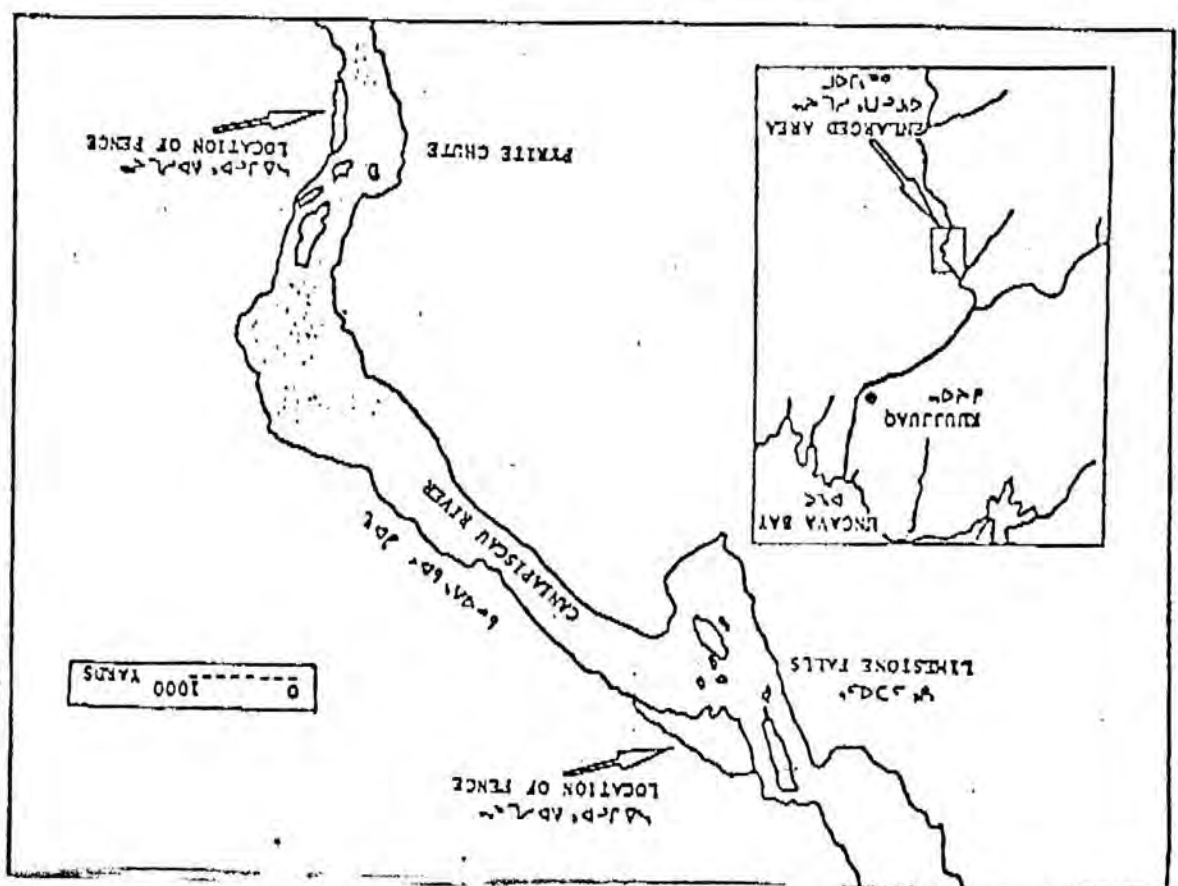
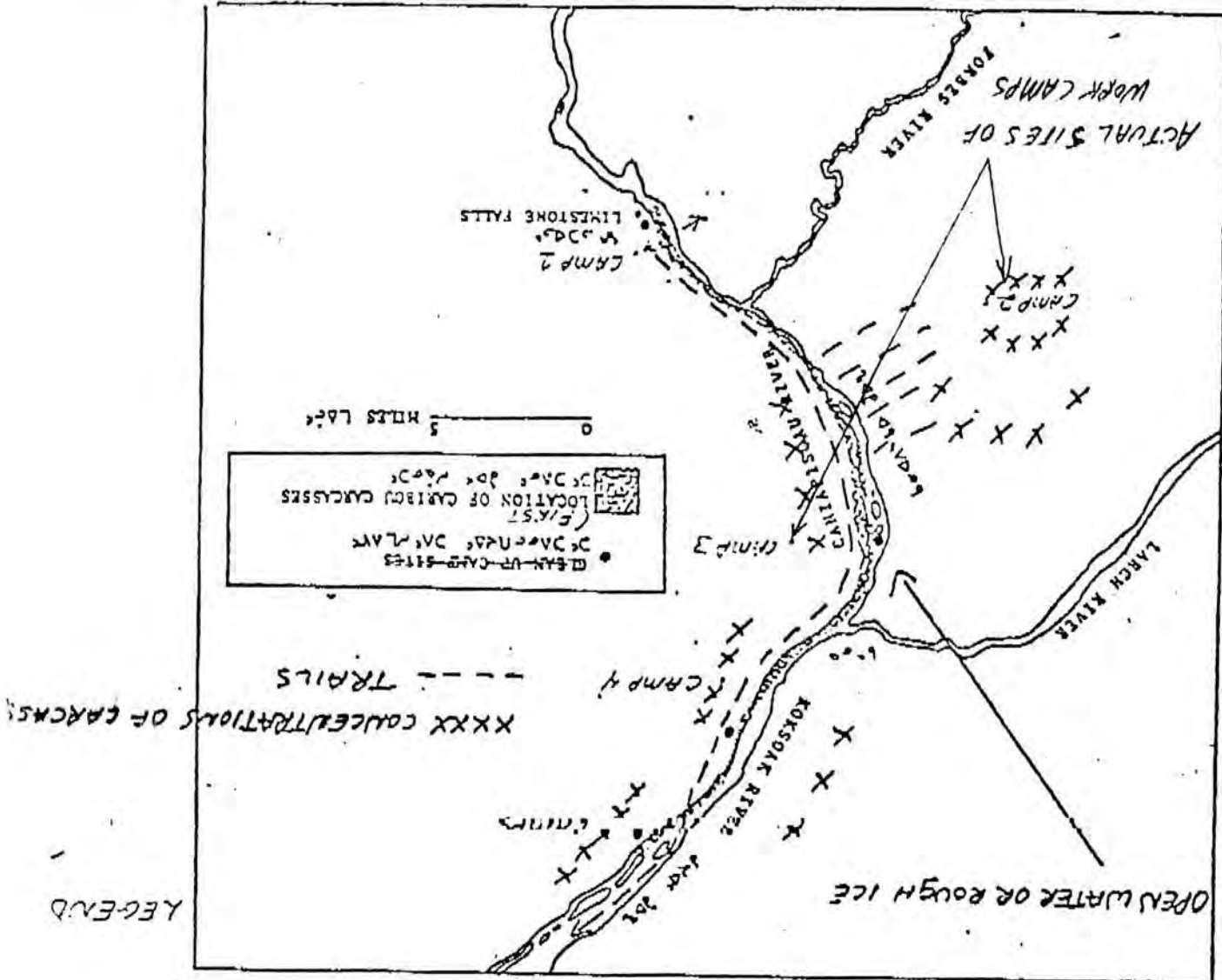
With respect to the proposed financial guarantee, we understand from your representatives that, in lieu of depositing an amount in trust, you would be agreeable to attach a condition to the payment of the last \$40,000 due to the proponent under the grant from Employment and Immigration Canada; namely, that such payment will only be made upon receipt of a notice from Environment Quebec that the condition respecting shipment of carcasses by April 30, 1985 has been complied with. We have discussed the foregoing with Employment and Immigration Canada and they have indicated their willingness, in principle, to attach such a condition to the last payment, on terms and conditions which will be worked out with you in the coming days.

We would kindly request that the necessary measures be taken to expedite the issuance of the required authorizations at your earliest possible convenience.

Yours truly,

TUKTU ASSISTANCE CORPORATION

Per: *Willie Watt / Hs.*
Willie Watt
Secretary-Treasurer



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+
ENU QBC

MAKIVIK MTL
LE 15 FEVRIER 1985

MONSIEUR PIERRE MEUNIER
SOUS-MINISTRE
MINISTERE DE L'ENVIRONNEMENT
2360 CHEMIN STE-FOY
12IEME ETAGE
QUEBEC: QUEBEC

OBJET: PROJET CONCERNANT L'ENLEVEMENT ET LE
NETTOYAGE DES CARCASSES DE CARIBOUS

MONSIEUR LE SOUS-MINISTRE:

NOUS AVONS BIEN RECU VOTRE LETTRE DU 8 FEVRIER 1985
CONCERNANT LE SUJET EN RUBRIQUE ET NOUS VOUS EN REMERCIONS.
DANS CETTE LETTRE, VOUS SUGGEREZ A LA SOCIETE MAKIVIK DE
RECOMMANDER QUE LE PROJET SOIT AJOUTE A L'ANNEXE B DE LA
LOI SUR LA QUALITE DE L'ENVIRONNEMENT, LAQUELLE CONTIENT
UNE LISTE TRES RESTRICTIVE DES PROJETS SOUSTRATS A LA
PROCEDURE D'EVALUATION ET D'EXAMEN.

MAKIVIK CROIT QUE VOTRE MINISTERE PEUT TRES BIEN
EMETTRE LES AUTORISATIONS REQUISES DANS LES PLUS BREFS
DELAYS SANS QU'IL SOIT NECESSAIRE DE MODIFIER L'ANNEXE B.
IL FAUT EVITER A TOUT PRIX QU'UNE ACTION DU MINISTERE
COMPROMETTE LES EMPLOIS DES INUIT PARTICIPANT AU PROJET,
ET EN PARTICULIER, LES FONDS MIS A LA DISPOSITION DE LA
SOCIETE TUKTU ASSISTANCE PAR LE PROGRAMME TRAVAIL CANADA
DE LA COMMISSION DE L'EMPLOI ET DE L'IMMIGRATION.

VOICI COMMENT NOUS VOYONS LES FAITS RELIES A CETTE
AFFAIRE. LE PROJET CONCERNANT LE NETTOYAGE ET L'ENLEVEMENT
DES CARCASSES A ETE SOUMIS AU MINISTERE DE L'ENVIRONNEMENT
LE 25 JANVIER 1985 DANS UNE LETTRE ADRESSEE A VOUS-MEME
PAR M. WILLIE HATT DE LA SOCIETE TUKTU ASSISTANCE, A LA
DEMANDE DE VOTRE MINISTERE ET CONFORMEMENT A LA LOI SUR
LA QUALITE DE L'ENVIRONNEMENT; CE DOCUMENT A ETE EXAMINE
PAR LA COMMISSION DE LA QUALITE DE L'ENVIRONNEMENT
KATIVIK (LA COMMISSION) A SA REUNION DES 29 ET 30
JANVIER 1985. LES RECOMMANDATIONS DE LA COMMISSION
VOUS ONT ETE COMMUNIQUEES PAR SON PRESIDENT, M. PETER
JACOBS, DANS UNE LETTRE DATEE DE 31 JANVIER 1985. MAKIVIK
A SOIGNEUSEMENT ETUDIE CES RECOMMANDATIONS ET LES
APPROUVE. PAR CONSEQUENT, LA SOCIETE MAKIVIK EST
D'AVIS QUE LA PROCEDURE PREVUE PAR LA LOI A ETE RESPECTEE
DANS L'ENSEMBLE ET QU'IL NE RESTE PLUS A VOTRE MINISTERE
QU'A AUTORISER CE PROJET LE PLUS TOT POSSIBLE SUIVANT
LES RECOMMANDATIONS DE LA COMMISSION.

MAKIVIK PENSE QUE LE PROJET EN CAUSE N'EST PAS VISE PAR L'ALINEA LB) DE L'ANNEXE A DE LA LOI QUI REFERE A 'TOUT SYSTEME D'ENLEVEMENT ET D'ELIMINATION DES DECHETS'. SELON NOUS, IL SERAIT PLUS OPPORTUN DE LE CONSIDERER COMME FAISANT PARTIE DE LA 'ZONE GRISE' DE LA LOI PLUTOT QUE DE SES ANNEXES A OU B. AINSI, IL EST CLAIR QUE LA COMMISSION PEUT, EN VERTU DE L'ARTICLE 192 DE LA LOI, DECIDER DE NE PAS ASSUJETTIR LE PROJET A LA PROCEDURE D'EVALUATION ET D'EXAMEN. MAKIVIK CROIT QUE CETTE APPROCHE EST LA MIEUX APPROPRIEE PUISQUE LE PROJET N'ENTRAINERA VRAISEMBLABLEMENT PAS DE REPERCUSSIONS NEGATIVES SUR L'ENVIRONNEMENT. DE TOUTE EVIDENCE, VOTRE MINISTERE PARTAGE CETTE OPINION PUISQU'IL EST PRET A SOUSTRAIRE LE PROJET A LA PROCEDURE.

IL FAUT AUSSI NOTER QUE VOTRE MINISTERE N'A PAS EXIGE D'EVALUATION NI D'EXAMEN DES IMPACTS LORSQUE LE GOUVERNEMENT DU QUEBEC A AUTORISE, EN OCTOBRE 1984, QU'ON RETIRE LES CARCASSES DE LA RIVIERE CANIAPISCAU POUR LES DEPOSER SUR LES COLLINES AVOISINANTES. ON PEUT DONC CONSIDERER LE NETTOYAGE ET L'ENLEVEMENT DES CARCASSES COMME LE PROLONGEMENT NECESSAIRE DE L'OPERATION D'URGENCE ENTREPRISE PAR LE QUEBEC.

D'UNE FACON PLUS GENERALE, MAKIVIK SE TROUVE FORT PERTURBEE PAR VOTRE SUGGESTION DE RECOMMANDER UNE MODIFICATION A L'ANNEXE B DE LA LOI DE LA QUALITE DE L'ENVIRONNEMENT. LA SOCIETE TUKTU ASSISTANCE NE SAVAIT PAS QU'IL LUI FALLAIT SOUMETTRE SON PROJET A LA PROCEDURE D'EVALUATION ET D'EXAMEN DANS UN DELAI PRECIS. C'EST BIEN MALHEUREUX, MAIS, A NOTRE AVIS, LE FAIT QU'UN PROMOTEUR NE RESPECTE PAS LES DELAIS PREVUS PAR LA PROCEDURE NE JUSTIFIE PAS QUE LES LOIS SOIENT MODIFIEES DE FACON ARBITRAIRE. PARAILLEURS, MAKIVIK SOUTIEND QU'ADOPTER LES MESURES D'EXEMPTION PREVUES A L'ARTICLE 203 DE LA LOI NE SERVIRAIT NI 'L'INTERET PUBLIC' NI, A LONGUE ECHEANCE, CELUI DES INUIT. BIEN AU CONTRAIRE, LA SOCIETE PENSE QUE CES DEUX FACONS DE PROCEDER NE SERVIRAIENT QU'A MINER LA PROCEDURE D'EVALUATION ET D'EXAMEN DES IMPACTS EN ETABLISSANT DE TRISTES PRECEDENTS DONT POURRAIENT SE SERVIR DES PROMOTEURS QUI ENTENDENT EXPLOITER LES RESSOURCES DE LA REGION AU DETRIMENT DES DROITS ET DES INTERETS DES INUIT. EN PARTICULIER POUR CE QUI CONCERNE LA FAUNE. LE REGIME DE PROTECTION DE L'ENVIRONNEMENT DU NORD QUEBECOIS EST D'UNE IMPORTANCE VITALE, Y SOUSTRAIRE DES PROJETS OU LE MODIFIER INUTILEMENT FINIRAIT PAR REDUIRE CE REGIME A UNE FACE.

EN CONCLUSION, NOUS REPETONS QUE NOUS APPUYONS PLEINEMENT LA DECISION DE LA COMMISSION ET DE VOTRE MINISTERE D'EMETTRE LES AUTORISATIONS REQUISES DANS LES DELAIS SERRES QUE DOIT RESPECTER LA SOCIETE TUKTU ASSISTANCE. NOUS CROYONS QUE AVEC L'AIDE DE VOTRE MINISTERE, LA SOCIETE TUKTU POURRA REALISER SON PROJET TOUT EN RESPECTANT LE REGIME DE PROTECTION DE L'ENVIRONNEMENT ET DU MILIEU SOCIAL NEGOCIE PAR LES INUIT.

ETANT DONNE L'URGENCE DE L'AFFAIRE, NOUS APPRECIERIONS RECEVOIR VOTRE REPONSE AU PRESENT TELEX D'ICI DEUX (2) JOURS.

VEUILLEZ AGREER, MONSIEUR LE SOUS-MINISTRE, NOS SALUTATIONS LES PLUS DISTINGUEES.

LA PRESIDENTE,

MARY SIMON
SOCIETE MAKIVIK

C.C.: ADMINISTRATION REGIONALE KATIVIK
SOCIETE TUKTU ASSISTANCE

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FEBRUARY 15, 1985

MR. PIERRE D. MEUNIER
 SOUS-MINISTRE
 MINISTERE DE L'ENVIRONNEMENT
 2360 CHEMIN STE-FOY,
 12IEME ETAGE
 QUEBEC, QUEBEC

RE: CARIBOU CARCASS CLEAN-UP AND REMOVAL
 PROJECT

DEAR SIR:

THANK YOU FOR YOUR LETTER OF FEBRUARY 9, 1985 REGARDING THE CARIBOU CARCASS CLEAN-UP AND REMOVAL PROJECT. IN YOUR LETTER, YOU ASK WHETHER MAKIVIK IS PREPARED TO RECOMMEND THIS PROJECT BE ADDED TO SCHEDULE B OF THE ENVIRONMENT QUALITY ACT, WHICH CONTAINS A HIGHLY RESTRICTIVE LIST OF PROJECTS EXEMPT FROM THE ENVIRONMENTAL AND SOCIAL IMPACT ASSESSMENT REGIME.

AS OUR LETTER INDICATES, MAKIVIK BELIEVES IT IS UNNECESSARY TO TAMPER WITH SCHEDULE B IN ORDER FOR YOUR DEPARTMENT TO PROCEED TO ISSUE THE NECESSARY AUTHORIZATIONS WITHIN THE SHORTEST POSSIBLE DELAYS. IN NO EVENT DOES MAKIVIK WANT YOUR DEPARTMENT TO JEOPARDIZE THE JOBS OF INUIT INVOLVED IN THIS PROJECT AND, MORE SPECIFICALLY, THE FUNDS AVAILABLE TO TUKTU ASSISTANCE CORPORATION THROUGH C.E.I.C.'S CANADA WORKS PROGRAM.

IT IS OUR UNDERSTANDING THAT THE FACTS RELATING TO THIS MATTER ARE AS FOLLOWS. THE CARIBOU CARCASS CLEAN-UP AND REMOVAL PROJECT WAS SUBMITTED TO ENVIRONNEMENT QUEBEC ON JANUARY 25, 1985 IN THE FORM OF A LETTER FROM MR. WILLIE WATT OF TUKTU ASSISTANCE CORPORATION TO YOURSELF. THIS DOCUMENT OF JANUARY 25, 1985 WAS REVIEWED BY THE KATIVIK ENVIRONMENTAL QUALITY COMMISSION (K.E.Q.C.) AT YOUR DEPARTMENT'S REQUEST AND IN COMPLIANCE WITH THE ENVIRONMENT QUALITY ACT. THE PROPOSED PROJECT WAS CONSIDERED BY THE K.E.Q.C. AT ITS MEETING OF JANUARY 29-30, 1985 AND THE COMMISSION'S RECOMMENDATIONS WERE SENT TO YOU IN A LETTER SIGNED BY THE CHAIRPERSON, MR. PETER JACOBS, DATED JANUARY 31, 1985. MAKIVIK HAS CAREFULLY STUDIED THE RECOMMENDATIONS OF THE K.E.Q.C. CONTAINED IN ITS LETTER OF JANUARY 31, 1985 AND AGREE WITH THEM. CONSEQUENTLY, MAKIVIK IS OF THE OPINION THAT THE ORDINARY PROCEDURES CALLED FOR BY THE ACT HAVE, FOR THE MOST PART, BEEN COMPLIED WITH AND THAT IT REMAINS FOR YOUR DEPARTMENT, BASED UPON THE JANUARY 31, 1985 LETTER OF THE K.E.Q.C., TO AUTHORIZE THIS PROJECT WITHIN THE SHORTEST POSSIBLE PERIOD OF TIME.

MAKIVIK DOES NOT CONSIDER THE CARIBOU CARCASS CLEAN-UP AND REMOVAL PROJECT AS FALLING UNDER ITEM (C) OF SCHEDULE A OF THE ACT; NAMELY: 'A SYSTEM FOR THE COLLECTION AND DISPOSAL OF SOLID WASTE'. RATHER; IT IS OUR VIEW THAT THIS PROPOSED PROJECT SHOULD FALL MORE APPROPRIATELY INTO THE 'GREY ZONE' AND NOT IN SCHEDULE A OR SCHEDULE B OF THE ACT. THEREFORE; THE K.E.R.C. CLEARLY HAS THE POWER TO DECIDE ON A TIMELY BASIS PURSUANT TO SECTION 192 OF THE ACT THAT THE PROJECT NOT BE SUBJECTED TO IMPACT ASSESSMENT. THE REASON WE BELIEVE THIS COURSE TO BE THE APPROPRIATE ONE IS THAT MAKIVIK FORESEES NO NEGATIVE ENVIRONMENTAL IMPACTS OF THE CLEAN-UP OPERATION. OBVIOUSLY; IF YOUR DEPARTMENT IS PREPARED TO EXEMPT THE PROJECT; IT MUST SHARE THIS OPINION. MOREOVER; IT SHOULD BE NOTED THAT NO IMPACT ASSESSMENT WAS REQUIRED BY YOUR DEPARTMENT WHEN THE QUEBEC GOVERNMENT AUTHORIZED THE REMOVAL OF THE CARIBOU CARCASSES IN OCTOBER 1984 FROM THE CANIAPISCAU RIVER AND THEIR DUMPING ON SURROUNDING HIGH GROUNDS. THE PRESENT CLEAN-UP CAN BE CONSIDERED AS A NECESSARY CONTINUATION OF QUEBEC'S EMERGENCY OPERATION.

MORE GENERALLY; MAKIVIK IS EXTREMELY CONCERNED OVER YOUR SUGGESTION THAT IT RECOMMEND AN AMENDMENT OR MODIFICATION TO SCHEDULE B OF THE ENVIRONMENT QUALITY ACT. IT IS UNFORTUNATE THAT TUKTU ASSISTANCE CORPORATION WAS UNAWARE THAT IT HAD TO SUBMIT ITS PROJECT ON A TIMELY BASIS TO THE IMPACT ASSESSMENT PROCESS. HOWEVER; LACK OF COMPLIANCE BY A PROPONENT WITH THE NORMAL DELAYS PROVIDED FOR IN THE ENVIRONMENTAL REGIME FOR NORTHERN QUEBEC DO NOT; IN OUR OPINION; JUSTIFY ARBITRARY AMENDMENTS TO THE LAW. NOR DOES MAKIVIK BELIEVE THAT IT IS IN THE 'PUBLIC INTEREST'; NOR IN THE LONG-TERM INUIT INTEREST; TO ADOPT THE EXEMPTION MEASURES CONTEMPLATED BY SECTION 203 OF THE ACT. IN OUR VIEW; BOTH OF THESE METHODS OF PROCEEDING SERVE TO SERIOUSLY UNDERMINE THE IMPACT ASSESSMENT PROCESS BY ESTABLISHING POOR PRECEDENTS FOR FUTURE PROPONENTS. THESE PRECEDENTS MAY LATER BE USED BY OTHER PROPONENTS INTENT UPON EXPLOITING THE NATURAL RESOURCES OF THE REGION TO THE DETRIMENT OF INUIT RIGHTS AND INTERESTS; PARTICULARLY THOSE RELATING TO WILDLIFE. UNNECESSARY AMENDMENTS TO THE REGIME; OR EXEMPTIONS FROM IT; WILL ULTIMATELY MAKE A FARCE OF THIS VITAL ENVIRONMENTAL PROTECTION REGIME FOR NORTHERN QUEBEC.

IN CLOSING; WE WISH TO REITERATE THAT WE FULLY SUPPORT THE K.E.R.C. AND YOUR DEPARTMENT ISSUING ALL NECESSARY AUTHORIZATIONS IN SUCH A MANNER AS TO MEET THE TIGHT DEADLINES CURRENTLY FACING TUKTU ASSISTANCE CORPORATION. WE BELIEVE THE PROPOSED PROJECT OF TUKTU ASSISTANCE CORPORATION CAN BE REALIZED WITH THE ASSISTANCE OF YOUR DEPARTMENT; WHILE AT THE SAME TIME RESPECTING THE ENVIRONMENTAL AND SOCIAL REGIME WHICH WAS NEGOTIATED BY INUIT.

IN LIGHT OF THE URGENCY; WE WOULD APPRECIATE A RESPONSE TO THE PRESENT TELEX WITHIN THE NEXT TWO (2) DAYS.

YOURS TRULY;

MARY SIMON
PRESIDENT
MAKIVIK CORPORATION

C.C. : KATIVIK REGIONAL GOVERNMENT
TUKTU ASSISTANCE CORPORATION

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Administration Régionale KATIVIK Regional Government
P.O. Box 9, KUUJJUAQ (Fort Chimo), Quebec J0M 1C0

Le 13 février 1985

M. Pierre B. Meunier
Sous-ministre
Ministère de l'Environnement
3900, rue Marly
6e étage
Sainte-Foy (Québec)
G1X 4E4

OBJET: L'enlèvement des carcasses de caribou le long
de la rivière Caniapiscau

Monsieur le Sous-ministre,

J'accuse réception de votre lettre du 8 février dernier concernant le sujet mentionné en rubrique. Je me dois d'abord de vous faire part de mon étonnement quant à la solution que vous nous proposez.

Le projet visant l'enlèvement des carcasses de caribou le long de la rivière Caniapiscau a été présenté à votre ministère le 25 janvier 1985 pour que vous donniez l'autorisation nécessaire. Votre ministère a par ailleurs transmis le projet à la Commission de la qualité de l'environnement Kativik afin qu'elle l'analyse et émette ses recommandations comme prévu par la Loi sur la qualité de l'environnement. En outre, la Commission aurait procédé à l'analyse du projet lors de son assemblée tenue les 29 et 30 janvier 1985 et par la suite, une lettre contenant ses recommandations vous aurait été envoyée le 31 janvier 1985.

Selon la procédure normale décrite dans la Loi sur la qualité de l'environnement et suite à votre approbation, votre ministère devrait bientôt émettre une autorisation. Nous avons étudié les recommandations de la Commission et nous sommes d'accord avec elles.

Par conséquent, nous ne pouvons comprendre la nécessité d'une proposition visant à modifier la Loi sur la qualité de l'environnement. Selon nous, il est inutile de modifier cette loi et, de plus, cette situation pourrait créer un précédent et compromettre la crédibilité des procédures normales d'évaluation et d'examen. A notre avis, les procédures existantes sont adéquates et la Loi ne devrait être modifiée que si une étude détaillée de la situation, y compris des consultations avec le Comité consultatif de l'environnement Kativik, établit un tel besoin.

Les membres Kativik, qui participent aux travaux de la Commission, sont d'avis que le projet a été approuvé sous réserve de certaines conditions et nous souhaitons que l'autorisation soit émise le plus tôt possible.

Veillez agréer, Monsieur le Sous-ministre, l'assurance de mes sentiments les meilleurs.

Le Président,

ORIGINAL ^{PAR}/_{BY}

Joseph Keleutak

JK/ng

c.c.: Mme Mary Simon, Présidente, Société Makivik
M. Willie Watt, Tuktu Assistance Corporation

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Administration Régionale KATIVIK Regional Government
P.O. Box 9, KUUJJUAQ (Fort Chimo), Quebec J0M 1C0

February 13, 1985

Mr. Pierre B. Meunier
Deputy-Minister
Ministère de l'Environnement
3900 Marly Street
6th floor
Sainte-Foy (Québec)
G1X 4E4

RE: Removal of caribou carcasses along the Caniapiscau River

Dear Sir,

This is to acknowledge receipt of your letter dated February 8, 1985 concerning the above-mentioned topic. First, I wish to express my surprise relative to the proposal which you have submitted to us.

It was our understanding that the project for the removal of caribou carcasses along the Caniapiscau River was submitted to your Department on January 25, 1985 for the purposes of obtaining the required authorization. The project was subsequently forwarded by your Department to the Kativik Environmental Quality Commission for review and recommendations, as required by the Environmental Quality Act. Furthermore, it is our understanding that the project was reviewed by the Commission at its meeting of January 29, 30, 1985 and that the Commission's recommendations were issued in a letter to you dated January 31, 1985.

It appears to us that, following normal procedures set out in the Environmental Quality Act and with your approval, an authorization from your Department would then be forthcoming. We have studied the recommendations of the Commission and are in agreement with these.

We cannot understand, therefore, the necessity of your proposal requesting a modification to the Environmental Quality Act. In our view, such a modification is not necessary and could create a precedent which could jeopardize the credibility of the normal evaluating and review procedures. We are of the opinion that the normal procedures are adequate and that any changes to the Act should only be made after a comprehensive review, including consultations with the Kativik Environmental Advisory Committee.

It is the understanding of our members on the Commission that, subject to certain conditions, the project was approved and it is our wish that the authorization of the project be issued within the briefest of delays.

Sincerely yours,



Joseph Keleutak
Chairman

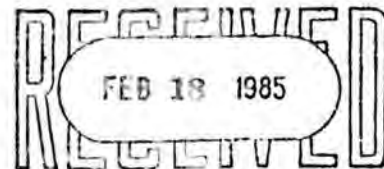
JK/ng

cc: Mrs. Mary Simon, President, Makivik Corporation
Mr. Willie Watt, Tuktu Assistance Corporation



Gouvernement du Québec
**Ministère
de l'Environnement**

Bureau du sous-ministre



Sainte-Foy, le 8 février 1985

Monsieur Josepi Keleutak
a/s M. Hervé Chataigner
Administration régionale Kativik
Boîte postale 9
Kuujuuaq (QC)
JOM 7C0

Monsieur le président,

Le 25 janvier 1985, je recevais un avis de projet concernant le nettoyage et l'enlèvement des carcasses de caribous morts noyés l'automne dernier. Ce projet m'était transmis par le secrétaire-trésorier de Tuktu Assistance Corporation, monsieur Willie Watt.

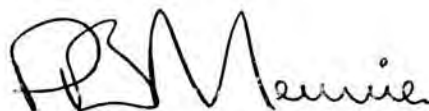
Depuis cette date, le ministère de l'Environnement de même que la Commission de la qualité de l'environnement Kativik ont examiné la teneur du projet. Après avoir pris connaissance des avis exprimés, je vous soumets aujourd'hui l'hypothèse suivante. Elle consisterait à modifier l'annexe B de la Loi sur la qualité de l'environnement (c.Q-2) afin de soustraire obligatoirement le projet de récupération des carcasses de caribous morts à l'automne 1984 à la procédure d'évaluation et d'examen visé à la section 3 du chapitre sur les dispositions applicables à la région de la Baie James et du Nord Québécois. Tel que prévu à l'article 23.3.13 de la Convention de la Baie James et du Nord Québécois, cette modification doit notamment faire suite au consentement de l'Administration régionale Kativik.

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Si l'Administration régionale Kativik est d'avis que cet amendement est opportun, j'apprécierais recevoir de sa part un document officiel me transmettant son consentement.

Par ailleurs, comme le texte de l'article 205 d) de la Loi sur la qualité de l'environnement le stipule, j'ai adressé une demande semblable à la Société Makivik.

Veillez agréer, Monsieur le président, l'expression de mes sentiments distingués.

A handwritten signature in black ink, appearing to read 'P. B. Meunier'. The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Pierre B. Meunier
Sous-ministre

TRANSLATION

Ste-Foy, February 8, 1985

Monsieur Josepi Keleutak
a/s M. Hervé Chatagnier
Administration régionale Kativik
Boîte postale 9
Kuujuuaq, QC
J0M 1C0

Mr. Chairman:

January 25, 1985, I was notified of a project to clear up and carry away the dead caribous, drowned last autumn. That project had been submitted to me by Mr. Willie Watt, secretary-treasurer of Tuktu Assistance Corporation.

Since that time, both the Ministry of the Environment and the Kativik Environmental Quality Commission have studied the content of the project. Having taken in due consideration the advises received, I submit to you the following possibility. It consists in the amendment of annex B of the Environmental Quality Act (c.0-2) in order to compulsorily withdraw the project of removing the dead caribous drowned in autumn 1984 from the obligation of the evaluation and study procedure set forth by section 3 of the Chapter on applicable articles to the James Bay and Northern Quebec region.

As provided by article 23.3.13 of the James Bay and Northern Quebec Agreement, that amendment can only be done following acceptance by the Kativik Regional Administration.

If such a proposed amendment is judged suitable by the Kativik Regional Administration, I would like to receive from them a written acceptance to my proposal.

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I inform you that, as stipulated by article 205 d of the Environmental Quality Act, I have addressed a similar request to Makivik Corporation.

Sincerely,

PIERRE B. MEUNIER
Deputy Minister

Le 31 janvier 1985

M. Pierre B. Meunier
Sous-ministre
Ministère de l'environnement
3900, rue Marly - 6e étage
Ste-Foy, Québec
G1X 4E4

Objet: Déplacement des carcasses de
caribous le long de la rivière
Caniapiscau

Monsieur le Sous-ministre,

Il nous fait plaisir de faire suite à lettre de M. Yves L. Pagé du 28 janvier dernier, concernant le projet de déplacement des carcasses de caribous le long de la rivière Caniapiscau.

La Commission note que selon la procédure normale faisant suite à la réception des renseignements préliminaires d'un tel projet, la Commission proposerait au ministère des directives d'études d'impacts. Une étude d'impacts serait alors soumise à la Commission pour évaluation et décision. Néanmoins, la lettre du 28 janvier dernier demande à la Commission ses recommandations concernant le besoin d'études des impacts de ce projet sur l'environnement et le milieu social.

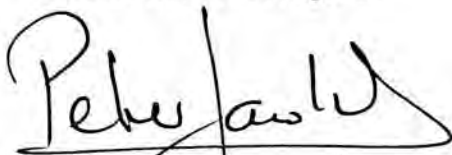
Plusieurs aspects du projet sont décrits de manière relativement vague et superficielle dans les renseignements préliminaires. Des références tels que "numerous working parties" et "one or more stockpile areas" qui se trouvent aux pages (10) et (11) du document rendent particulièrement difficile la tâche de la Commission de quantifier la nature, la portée et la dimension temporelle du projet. Quoique ce document fasse un survol du projet, il ne donne généralement pas de détails suffisants.

Le Ministère de l'Environnement pourrait cependant décider de suivre les procédures normales tel que stipulé par la Loi de la qualité de l'environnement, c'est-à-dire la formulation de directives et l'exigence d'une étude des impacts préparée par le promoteur. Cependant, nonobstant la décision du ministère à cet égard, la Commission a pu, sur la base des renseignements contenus dans le document du promoteur, formuler une série de recommandations ou conditions qui pourraient faire partie de l'autorisation de procéder à la réalisation du projet, qui sont les suivantes:

- Le besoin d'assurer qu'aucune carcasse de caribou demeure à Kuujjuaq après la date limite du 30 avril 1985. Une garantie financière pourrait être imposée afin d'assurer que le promoteur rencontrera cette obligation d'éliminer les caribous de Kuujjuaq avant cette date.
- Le besoin d'assurer que pour chaque site de disposition de caribous exploité par le promoteur, toutes les carcasses soient dégagées. Il est, en effet préférable de dégager complètement un nombre limité de sites plutôt que de n'en dégager que partiellement un grand nombre de sites.
- La nécessité d'assurer que toutes structures temporaires, fournitures et équipements, incluant les barils de carburant, soient enlevées de la région à la fin du projet et ce avant le 15 mai 1985.
- Le besoin d'assurer que l'état sanitaire sur le territoire de la municipalité de Kuujjuaq sera maintenu et que tout aspect du projet relatif à l'entreposage, au débitage et au transport des carcasses, ainsi que la disposition de toutes parties des carcasses qui ne seront pas utilisées, seront conformes aux lois et règlements du Ministère de l'Environnement ainsi que toutes autres lois et règlements en vigueur.

La Commission regrette que ce projet lui ait été soumis le jour même de son assemblée, l'ajouttant à un ordre du jour déjà chargé et ne permettant pas aux membres de l'étudier à l'avance.

Je vous prie d'agréer, Monsieur le Sous-ministre, l'expression de mes sentiments distingués.



Peter Jacobs
Président



Gouvernement du Québec
**Ministère
de l'Environnement**

Bureau du sous-ministre



Sainte-Foy, le 30 janvier 1985

Monsieur Hervé Chatagnier
Secrétaire de la Commission de la
qualité de l'environnement Kativik
Administration régionale Kativik
Case postale 9
Kuuujuaq, QC
JOM 1C0

OBJET: Déplacement des carcasses de caribous le long de
la rivière Caniapiscou
Notre dossier: 000-BJ342-10

Monsieur,

Veuillez trouver ci-joint copie de la version française des renseignements préliminaires du projet mentionné en titre.

La version originale anglaise a été adressée au président de la Commission, monsieur Peter Jacobs, le 28 janvier dernier par monsieur Yves L. Pagé du ministère, conformément à l'article 195 de la Loi sur la qualité de l'environnement.

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

LOUIS J. TREMBLAY

c.c.: Pierre B. Meunier, sous-ministre
A.R.K., a/s du secrétaire et 1 copie du document
Jean-Paul Noël, dir. rég. par intérim (10) et 1 copie du doc.

TRADUCTION

TUKTU ASSISTANCE CORPORATION
Kuujjuaq, Quēbec

Le 25 janvier 1985

Monsieur Pierre B. Meunier
Sous-ministre
Ministère de l'Environnement
2360 Chemin Ste-Foy
12ième étage
Quēbec, Quēbec



Sujet: Projet concernant le nettoyage
et l'enlèvement des carcasses
de caribous (le "projet")

Monsieur Meunier,

Il nous fait plaisir de vous fournir une description du projet ci-dessus mentionné afin d'obtenir, dans les meilleurs délais possibles, les autorisations qui peuvent être requises du Ministère de l'Environnement.

En résumé, le projet comporte l'emploi d'une main-d'oeuvre composée d'environ 115 personnes, principalement des habitants de Kuujjuaq, pour

- repérer les divers emplacements où des carcasses ont été jetées à la suite du désastre de la rivière Caniapiscou;
- rassembler et transporter les carcasses à une ou plusieurs aires de stockage convenables à proximité de la région du désastre;
- retirer les sous-produits des carcasses (les panaches, queues, etc.);

- procéder au transport des carcasses depuis la région du désastre, en les faisant descendre le long de la rivière Caniapiscou, jusqu'à un emplacement situé sur le bord de la rivière à environ un quart de mille de l'aéroport de Kuujjuaq;
- prendre des dispositions pour l'envoi des carcasses à partir de Kuujjuaq jusqu'à Montréal (aéroport de Dorval) dans des conteneurs (du type "Igloo") par Nordair; et
- organiser la prise de possession et la manutention de ces conteneurs par le détenteur autorisé d'un permis d'atelier d'équarrissage, catégorie fondoir, et pour le transport desdits conteneurs au fondoir du détenteur de permis afin que soient retirées des carcasses:
 - (i) les huiles pour revente par le détenteur de permis à des fabricants de savon, et
 - (ii) les farines pour la revente par le détenteur de permis à des producteurs de nourriture animale pour utilisation comme composante de la nourriture animale.

Le projet est décrit en détails ci-dessous. Il serait maintenant utile de réviser quelques événements et certaines décisions qui ont donné naissance au projet.

HISTORIQUE

En septembre 1984, les carcasses d'environ 10,000 caribous ont été trouvées le long des rivières Caniapiscau et Koaksoak, en aval des chutes Limestone où ils étaient morts en tombant en bas des chutes ou s'étaient noyés en traversant la rivière Caniapiscau.

Parce qu'on craignait le début du gel de l'hiver et qu'en conséquence, les carcasses restent dans les rivières, on décida alors, comme mesure corrective principale, de transporter les carcasses à proximité des rivières à l'aide d'hélicoptères.

Le déroulement du nettoyage a été dirigé par un comité de nettoyage d'urgence composé de représentants de la Corporation du Village Nordique de Kuujjuaq, l'Administration Régionale Kativik et la Corporation Makivik.

En résultat de ce qui précède, environ 9 600 carcasses de caribous sont dispersées dans des terrains de décharge situés à une distance de $\frac{1}{4}$ à un $\frac{1}{2}$ mille des rivières sur des rivages d'une longueur approximative de 20 milles. Nous croyons savoir que le Ministère de l'Environnement a fourni le financement principal pour les activités précitées et les mesures s'y rapportant directement.

Bien que des opinions différentes ont été émises, l'opinion dominante des institutions locales, groupes et individus à Kuujjuaq était qu'on devrait éventuellement retirer les carcasses de leur emplacement actuel et non pas les laisser tout simplement se décomposer.

Les Inuit de la région, appuyés par la Corporation du Village Nordique de Kuujjuaq et par la Corporation Nayumivik (Corporation foncière de Kuujjuaq), ont entrepris la planification d'un projet visant à retirer les carcasses et à fournir en même temps de l'emploi aux habitants de la région, de même que la possibilité d'acquérir de l'expérience dans le domaine de la disposition ou de la vente des carcasses et de leurs sous-produits.

Dans l'intention d'assurer un porte-parole aux opinions de la communauté locale sur des sujets précis et, spécialement, sur la question des carcasses de caribous, les divers groupes locaux ont formé la Kuujjuaq Wildlife Federation.

La Kuujjuak Wildlife Federation se compose de représentants de la Corporation du Village Nordique de Kuujjuaq, la Corporation Nayumivik (la Corporation foncière locale), Fort Chimo Co-operative Association (la Co-op locale), Caribou Ungava Limited (une entreprise commerciale locale), le Unguviak Wildlife Committee (représentant les chasseurs locaux) et la soussignée, la Tuktu Assistance Corporation, qui a été formée pour exécuter le projet proposé.

La Kuujjuaq Wildlife Federation a nommé Tuktu Assistance Corporation comme proposante du projet et a adopté une résolution à cet effet le 26 novembre 1984, laquelle demeure en vigueur. De plus, la Corporation Makivik a également adopté une résolution le 5 décembre 1984 en vertu de laquelle elle exprime son appui aux efforts de Tuktu Assistance Corporation en vue du nettoyage des carcasses, laquelle résolution demeure également en vigueur.

Des discussions ont été entamées avec les gouvernements du Canada et du Québec dans l'intention

- (i) d'aviser les deux gouvernements quant à la nécessité du projet;
- (ii) d'obtenir le consentement et l'appui au projet, y compris l'aide financière et l'appui technique; et
- (iii) dans la mesure nécessaire, de coordonner les activités dont on a proposé l'exécution.

Les représentations des Inuit à l'égard de ce projet ont inclus une lettre à l'Honorable Brian Mulroney, Premier Ministre du Canada, de la part de Johnny E. Watt, maire de la Corporation du Village Nordique de Kuujjuaq et M. Sandy Gordon, fils, président de la Corporation Nayumivik, en date du 29 octobre 1984, demandant au Premier Ministre d'intervenir vu ses responsabilités spéciales comme membre du Parlement pour la circonscription électorale de Manicouagan. Des communications ont également eu lieu au même moment avec l'Honorable René Lévesque, Premier Ministre du Québec vu sa responsabilité pour le SAGMAI.

Le 13 novembre 1984, un groupe d'Inuit de Kuujjuaq (Willie Gordon, Jackie Koneak, Charlie Gordon et Charlie Watt), pour le compte et avec l'approbation de la Corporation du Village Nordique de Kuujjuaq et de la Corporation Nayumivik, a assisté à une réunion à Québec avec l'Honorable Guy Chevrette, alors Ministre du Loisir, chasse et pêche, à laquelle le projet d'enlèvement des carcasses proposé a été discuté en détails.

M. Cheyrette a exprimé son appui au projet et s'est engagé à émettre les autorisations qui pourraient s'avérer nécessaires pour permettre à la Tuktu Assistance Corporation de s'occuper des sous-produits. Le ministre a également offert, au nom de son Ministère, d'intervenir en particulier auprès du Ministère de l'agriculture, pêcheries et alimentation, et auprès d'autres ministères afin d'aider à l'obtention de toute autre autorisation qui pourrait être nécessaire.

Le 29 novembre 1986, à la demande de M. Cheyrette, une proposition détaillée a été soumise au MLCP afin de fournir au ministre les renseignements dont il avait besoin pour donner effet à ce qui précède.

Depuis lors, des discussions continues se sont déroulées entre nous et les représentants du MLCP lesquels ont continué de manifester leur appui au projet. Ils ont également indiqué, du moins verbalement, que les Inuit pourraient valablement disposer des sous-produits provenant de caribous. En ce qui concerne la chair provenant des carcasses de caribous, les représentants du MLCP étudient actuellement l'adoption d'un amendement à un règlement existant, et ce en vue de couvrir la situation particulière du désastre de la Caniapiscou. L'amendement autoriserait la disposition de la viande des carcasses pour une période définie si cet aspect n'est pas couvert par d'autres règlements (tels que le Règlement sur les aliments, (R.R.Q. c. P-29, r.1 adopté en vertu de La Loi sur les produits agricoles, les produits marins et les aliments, L.R.Q. c. P-29, s.40).

Nous avons également communiqué avec le Ministère de l'agriculture, pêcheries et alimentation afin de déterminer avec les représentants de ce ministère quelles autorisations peuvent être requises dans le cadre des circonstances spéciales ayant trait au désastre et quelles dispositions nous pourrions prendre afin d'assurer qu'il soit tenu compte des facteurs d'hygiène raisonnables.

FAITS RÉCENTS

En décembre 1984, conformément à une demande adressée par Tuktu Assistance Corporation à Emploi et Immigration Canada en vertu du Programme Canada au Travail, le Canada a approuvé, en principe, le financement jusqu'à concurrence d'une somme de 815 000 \$ pour les activités prévues par le projet, y compris l'emploi de main-d'oeuvre, la création de campements de travail et la préparation de carcasses pour le transport à Kuujuaq et de Kuujuaq à Montréal (Dorval).

Tuktu Assistance Corporation a continué ses préparatifs en ce qui concerne la logistique du projet (recrutement de la main-d'oeuvre, acquisition du matériel, immobilisations, mesures de transport, mesures en vue de la disposition des carcasses, etc.) et le 23 janvier 1985 elle a conclu une entente avec Emploi et Immigration Canada pour exécuter le projet, sous réserve des modalités s'appliquant normalement à de telles ententes, y compris l'obtention de toute autorisation nécessaire.

Il a été indiqué à Tuktu Assistance Corporation et à d'autres représentants Inuit à plusieurs occasions au cours de la période précitée que le gouvernement du Québec, y compris le Ministère de l'Environnement, était, en principe, d'accord avec le projet. En fait, nous croyons savoir que la décision du Canada à l'effet d'octroyer le financement et l'appui du projet a été prise après une consultation directe, amorcée par le bureau du Premier Ministre du Canada, entre le Ministre de l'Environnement (Canada) et le Ministre de l'Environnement (Québec).

En outre, il a été signalé que le Ministère de l'Environnement (Québec) avait offert de coordonner les activités des différents ministères provinciaux touchés, particulièrement lorsque celles-ci ont trait à des autorisations.

Finalement, nous avons compris que l'Honorable Adrien Duquette, Ministre de l'Environnement, désirait que nous assistions à une réunion avec lui afin de réviser les détails du projet. Nous avons tenté sans succès d'organiser une telle réunion à la date suggérée, soit le 16 janvier, et nous avons été prévenus que le Ministre n'était alors pas disponible. Par la suite, le bureau du Ministre a dû annuler la réunion qui avait été antérieurement organisée avec, entre autres, M. Johnny Watt, maire de Kuujuaq, le 23 janvier.

Nous nous reportons à ce qui précède uniquement afin de vous assurer que nos efforts de collaboration avec le gouvernement du Québec, y compris le Ministère de l'Environnement, à l'égard de ce projet remontent à plus de deux mois avant la date de la présente lettre.

JUSTIFICATION ET BUT DU PROJET

Tel que déclaré ci-dessus, l'opinion dominante de la communauté Kuujjuaq était qu'on devrait retirer les carcasses de l'emplacement du désastre et non pas tout simplement les laisser se décomposer.

Au moment du nettoyage initial, le maire de Kuujjuaq, M. Johnny Watt, a consenti aux mesures d'urgence sous réserve d'une entente à l'effet qu'il y aurait une seconde phase comportant l'enlèvement des carcasses.

La communauté Kuujjuaq est d'avis qu'environ 10 000 carcasses en pourriture menacent suffisamment l'environnement de l'habitat le long des rivières Caniapiscou et Koksoak pour que leur enlèvement soit justifié. Bien que les répercussions les plus éloignées ne seraient connues que dans l'avenir, la communauté craint la possibilité du commencement d'une maladie au sein de la population des renards, l'augmentation possible des bandes de loups dans la région de Kuujjuaq et un changement éventuel possible dans les routes de migration des caribous.

Les prévisions à l'effet que les carcasses de caribous entraîneraient une augmentation du piégeage des renards se sont révélées mal fondées. Les familles Inuit qui ont campé dans la région du désastre jusqu'au 20 novembre ont rapporté qu'il n'y avait pas d'augmentation dans le nombre des renards piégés. De plus, les carcasses se trouvent entre les arbres, emplacements où les renards ne sont pas généralement piégés en quantités importantes.

Le choix de laisser continuer ou de supprimer le fléau que représente la présence d'environ 10 000 carcasses dans la région, même s'il s'agit d'un secteur "non peuplé", semble s'imposer. La création d'emplois pour environ 115 personnes à un moment où peu d'emplois sont disponibles dans la région constitue un facteur additionnel qui semble plus que justifier le projet. Nos représentants ont eu des discussions non-officielles avec les représentants de la Société d'Énergie de la Baie James au cours desquelles ces derniers ont indiqué qu'il était évidemment préférable d'enlever les carcasses.

PROPOSANTE

Tuktu Assistance Corporation a été constituée en vertu de la Partie II de la Loi sur les corporations canadiennes comme société commerciale sans but lucratif afin d'exécuter, de diriger et d'administrer le projet et toutes les activités s'y rapportant ou en découlant.

Le siège social de la Corporation est à Kuujjuaq et les administrateurs et dirigeants de la Corporation sont les personnes suivantes, toutes de Kuujjuaq, Québec:

Willie Gordon, président, Willie Watt, secrétaire-trésorier, Edward Koneak, administrateur, Johnny Adams, administrateur.

Les personnes admissibles à titre de membre de la Corporation sont les Inuit résidant à Kuujjuaq qui ont atteint l'âge de la majorité et sont affiliés à ladite communauté de Kuujjuaq au sens de la Convention de la Baie James et Nord Québécois.

NATURE ET PORTÉE DU PROJET

Le projet prévoit les activités suivantes:

- a) L'établissement de cinq (5) campements de travail le long des rivières Caniapiscau et Koaksoak et de sentiers allant des terrains de décharge jusqu'aux rivières. Une carte des emplacements des travaux est ci-jointe en Annexe "A".

La main-d'oeuvre consacrera beaucoup de temps à dresser les campements, à établir les sentiers en terrain accidenté et à repérer et creuser les divers terrains de décharge où les carcasses ont été placées.

- b) Le rassemblement et le transport des carcasses dans leur état congelé vers une ou plusieurs aires de stockage convenable à proximité de la région du désastre.

Ces travaux seront exécutés par de nombreuses parties qui établiront des aires et stockage sur des plates-formes surélevées sur lesquelles les carcasses ou des parties de celles-ci seront placées hors d'atteinte des autres animaux.

- c) La préparation des carcasses pour le transport et la construction de traîneaux de bois pour les amener depuis l'emplacement du désastre jusqu'à Kuujjuaq.

Les sous-produits (panaches, queues, etc.) seront retirés des carcasses et le reste des carcasses sera préparé pour le transport à Kuujjuaq. Comme dans le cas des autres étapes, ces travaux seront exécutés pendant plusieurs semaines durant lesquelles la logistique du transport des carcasses sera déterminée. Il est probable que les carcasses entières soient envoyées à Kuujjuaq.

- d) Le transport des carcasses et des sous-produits par motoneiges et traîneaux à Kuujjuaq et le chargement des conteneurs à l'arrivée à Kuujjuaq.

Il est proposé de décharger les traîneaux à un dépôt situé à un quart de mille environ de l'aéroport de Kuujjuaq. Les carcasses seraient immédiatement chargées (pendant qu'elles sont congelées) dans des conteneurs fournis à cet effet par le transporteur, Nordair, et livrées à l'aéroport de Kuujjuaq.

- e) Le transport des carcasses depuis l'aéroport de Kuujjuaq jusqu'à Montréal (aéroport de Dorval).

Des dispositions ont été prises avec Nordair en rapport avec le transport des carcasses à l'aéroport de Dorval à Montréal. Nordair fournira une certaine quantité de conteneurs fermés de fibre de verre (du type "Igloo") aux fins du transport. Les conteneurs ont des dimensions approximatives de 108" x 88" x 6' et leur capacité de stockage est évaluée à au moins 3 000 livres de cargaison. (Nordair maintiendra également disponibles un certain nombre de palettes sur lesquelles les carcasses pourraient être attachées et couvertes. On ne prévoit pas que ces palettes devront être utilisées; cependant elles seront mises en réserve.)

Tuktu Assistance Corporation s'assurera que les conteneurs sont chargés et livrés à Nordair, prêts pour l'embarquement sur l'avion. Nordair a des vols quotidiens (excepté le dimanche) à partir de Kuujjuaq et le transport des carcasses sera effectué selon l'espace disponible sur les avions. L'espace disponible un jour donné peut varier entre un maximum de 22 000 livres et un minimum de 3 000 livres.

Le taux de livraison des carcasses provenant de l'emplacement du désastre à Kuujjuaq sera coordonné afin d'assurer une période minimum de stockage au dépôt de Kuujjuaq.

Étant donné l'importance des mesures de transport, nous avons joint, en Annexe "B", un exemplaire d'une lettre du 25 janvier 1985 envoyée par Nordair à Caribou Ungava Limitée et Tuktu Assistance Corporation au sujet de ce qui précède.

f) La commercialisation et la disposition des carcasses et des sous-produits.

Tuktu Assistance Corporation a pris des mesures avec Caribou Ungava Limitée en vue de la disposition des carcasses et des sous-produits ou de leur mise en marché, ou des deux à la fois. Les revenus revenant à Tuktu Assistance Corporation à cet égard seront affectés aux frais engagés dans l'exécution du projet. Les surplus revenant à Tuktu Assistance Corporation à cet égard seraient distribués ou réinvestis dans la communauté de la manière approuvée par l'ensemble de la communauté, et compatible avec toute règle en vertu de laquelle le financement provenant des organismes gouvernementaux pourra avoir été reçu.

- g) Le transport des carcasses depuis Kuujjuaq à Montréal et la manutention lors de l'arrivée à Montréal.

Caribou Ungava Limitée, en consultation avec Tuktu Assistance Corporation, a pris des dispositions pour la manutention des carcasses de caribous lors de leur arrivée à Montréal.

Lorenzo, une division de Les Moulins Maple Leaf Limitée, a offert ses services pour recevoir et traiter les carcasses lors de leur arrivée à l'aéroport de Dorval. Lorenzo détient des permis d'équarrissage émanant du Ministère de l'Agriculture (Canada) de même que du Ministère de l'Agriculture (Québec).

Lorenzo prendra des dispositions pour que les conteneurs de Nordair soient chargés directement sur des camions pour être transportés au fondoir de Lorenzo située à Ville Ste-Catherine (près du pont Mercier à Montréal). Les carcasses seront fondues conformément aux procédures normalement appliquées dans ces usines de traitement et les conteneurs seront de la même façon nettoyés à la vapeur conformément aux conditions s'appliquant normalement dans ces usines, avant d'être renvoyés à Nordair. La méthode de manutention proposée des carcasses avant leur arrivée à l'usine n'affectera en aucune façon leur traitement conformément aux procédures et règles normales.

Encore une fois, à cause de l'importance de la manutention des carcasses, nous avons jugé utile de joindre à la présente lettre, en Annexe "C", un exemplaire d'une lettre en date du 25 janvier 1985 adressée à Tuktu Assistance Corporation et Caribou Ungava Limitée par Lorenzo en rapport avec ce qui précède.

DÉLAIS RELATIFS AU PROJET

La majorité des parties du projet qui ont trait à la manutention et au transport des carcasses doivent être mises en marche le plus rapidement possible. La main-d'oeuvre travaillera en terrain difficile, dans des conditions météorologiques défavorables. A cause des retards déjà subis, la tâche qui consistera à repérer le plus grand nombre possible de terrains de décharge sera considérable. Bien qu'on espère repérer et éventuellement enlever le plus grand nombre possible de carcasses, et en disposer, on évalue qu'au moins 6 000 carcasses pourront être repérées et transportées.

Dans la mesure où la manutention des carcasses aura lieu pendant qu'elles sont congelées et étant donné les conditions météorologiques, Tuktu Assistance Corporation a l'intention de terminer la partie du projet ayant trait au transport, à l'enlèvement et à la disposition des carcasses d'ici au 30 avril 1985 au plus tard. Tel qu'il a été expliqué à tous les intéressés, des retards additionnels porteraient sérieusement atteinte à la viabilité du projet.

CONCLUSION

Nous espérons que la description précitée du projet vous fournira les renseignements essentiels pour prendre les mesures nécessaires en vue de l'émission de toute autorisation requise. Il s'est avéré évident dès le début que ce projet est d'une nature spéciale et qu'il a été proposé afin de régler une situation particulière qui ne résulte pas de notre fait, mais qui, malgré tout, nous affecte sérieusement.

Il nous semble évident que le projet nous fera atteindre notre but à court terme lequel consiste à nettoyer une fois pour toutes, ce qui constitue un désastre environnemental. En outre, il est probable que l'expérience que nous acquerrons en exécutant le projet nous soit favorable en rapport avec des questions futures ayant trait à des programmes de commercialisation de la ressource que constitue le caribou.

Nous espérons que ces renseignements dissiperont tout faux renseignement en rapport avec le projet qui a malheureusement amené une menace d'injonction de la part des représentants de votre Ministère. Nous avons eu des discussions avec vos représentants à savoir si ce projet est réellement un projet prévu par l'Annexe "A" de la Loi sur la qualité de l'Environnement. A notre avis, ce projet, qui prévoit des mesures isolées pour régler un désastre particulier, n'est pas "un système d'enlèvement et d'élimination des déchets" au sens du paragraphe (1) de l'Annexe "A". La

référence à un "système" signifie clairement une référence à l'établissement d'un système permanent d'exploitation et les biens meubles et immeubles réservés à ces fins, tel qu'il appert de la définition de "système de gestion des déchets" à l'article 1(12) de ladite loi.

De toute façon, si le Ministère maintient l'opinion exprimée jusqu'ici quant à ce qui précède, il semble clair que les parties du projet qui seraient touchées par votre classification, si elles doivent commencer, doivent débiter rapidement. Dans un tel cas, nous soumettons qu'il serait nécessaire dans l'intérêt public d'adopter les mesures d'exemption prévues dans l'article 203 de ladite loi.

Cette demande à l'égard du projet, doit, évidemment, être faite sous réserve des arguments précités. Elle est néanmoins présentée en vue d'obtenir toutes les autorisations nécessaires dès que possible et de collaborer entièrement avec vous à cet égard. Il nous fera par conséquent plaisir de vous fournir tous les autres renseignements dont vous pourrez avoir besoin.

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

TUKTU ASSISTANCE CORPORATION

Le secrétaire-trésorier

(Signée) Willie Watt par ccg
Willie Watt

WW/ccg
P.j.



Labrador Inuit Association

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January 29, 1985

Kativik Environmental Quality Commission
Professor Peter Jacobs
Faculty of Environmental Planning & Design
Universite de Montreal
Montreal, Quebec
H3C 3A7

Dear Professor Jacobs:


The attached document is a brief presented to
S.A.G.M.A.I. of the Quebec Government on January 18, 1985.

The Labrador Inuit Association had requested a public
inquiry into the caribou disaster at Caniapiscou River,
September 1984. Unfortunately, our request was denied.
However, the Quebec Government has agreed to conduct an
internal hearing into the disaster, to try and determine
the reason for the disaster.

The Labrador Inuit Association took the opportunity
to prepare the attached document in order to express our
sincere concerns regarding the disaster and to request
joint management and protection of the herd.

We present this document to you for your information.
We would, however, appreciate any comments you may have
regarding the document or the Caniapiscou River caribou
disaster.

Yours sincerely,


Chesley Andersen
L.I.A. Land Claims Director

CA/h1

Encls.

BRIEF OF THE LABRADOR INUIT ASSOCIATION
RE: CANIAPISCAU RIVER CARIBOU DISASTER
SEPTEMBER 1984

SUBMITTED TO S.A.G.M.A.I.
JANUARY 18, 1985

Presented by: Toby Andersen, Director, L.I.A.
Chesley Andersen, Land Claims Director, L.I.A.
William Kalleo, Interpreter - Translator, L.I.A.
Clemence William Jararuse, Member, L.I.A.

As members of the Labrador Inuit Association (L.I.A.) and on behalf of the Labrador Inuit hunters, we want to express to Quebec our deep concern about the caribou disaster at the Caniapiscau River. Upon the discovery of this tragic incident, our feelings were and still are in a state of emotional distress. Because the Hebron/George River caribou herd is so vital to our livelihood, this disaster affects us like a death in our families. Because of this emotional concern, we appreciate the opportunity to present our feelings to Quebec through a brief to the S.A.G.M.A.I. investigation.

1. INTRODUCTION

Since we learned that almost 10,000 caribou drowned on the Caniapiscau River in Quebec the feelings of many Labrador Inuit have changed from shock, to fear and now to frustration. The frustration grows as time passes. As Labrador Inuit, our lives have always been closely tied with the caribou of the Hebron/George River herd. It is one of the great resources of our land, and we feel that a threat to the herd is a threat to our ability to provide for our future generations.

Because the 10,000 caribou drowned on the Caniapiscau River in Quebec, there is a tendency for people to think that the

disaster is a long way from Labrador, so it does not concern the Labrador Inuit. This attitude feeds the frustration of the Labrador Inuit because it denies the migratory nature of the herd and because, more than anything else, it threatens the very essence of our culture and livelihood.

We want to understand the cause of this disaster and what it means for the management of the herd. When we heard about it, L.I.A. immediately volunteered the assistance of Labrador Inuit hunters to help in the clean-up operations. L.I.A. wrote to Quebec, to Canada and to Newfoundland urging that a public inquiry be established as the best way to obtain all the facts and expert opinions in a way that would allow the other users and managers of the herd to participate. Despite the refusal by the Premier of Quebec to allow a public inquiry, L.I.A. continued to correspond with the governments of Quebec, Canada and Newfoundland, asking for a chance to review all the facts and contribute the expertise, concerns and recommendations of the Labrador Inuit. L.I.A. has attached a record of the correspondence to this brief for your information.

Despite the refusal of Quebec to hold a public inquiry, L.I.A. still maintains that a public inquiry is the proper forum to address the issues raised by the Caniapiscau River caribou

disaster and in which to hear from Labrador Inuit hunters themselves.

L.I.A. is submitting this brief to the internal reviewers of S.A.G.M.A.I. who are conducting an investigation into the Caniapiscau River caribou disaster at the invitation of S.A.G.M.A.I. in a letter to L.I.A. dated January 7, 1985. This does not mean that L.I.A. endorses the internal inquiry approach.

This brief addresses what L.I.A. considers to be a central issue in the drowning of 10,000 caribou, namely, the issue of joint management. L.I.A. has repeatedly stated that a management regime for a migrating species like the caribou must manage the entire population throughout its range, regardless of artificial political boundaries and must recognize the legitimate rights and interests of the people who hold the primary rights and interests in that herd.

This brief also discusses what L.I.A. considers to be other major concerns and issues for the Labrador Inuit, arising from the disaster. These concerns range from the cause of the drownings, to the isolation of the Labrador Inuit from the management system, to the inadequacy of the environmental protection regime. These concerns raise the larger issues of joint

management, environmental protection, contingency planning and compensation.

The brief concludes with some recommendations which L.I.A. believes begin to address the implications of the Caniapiscau River caribou disaster.

2. IMPORTANCE OF THE HERD TO LABRADOR INUIT

The Labrador Inuit have hunted the caribou herds of Northern Labrador and Quebec since time immemorial. Every year, the Labrador Inuit travel into the barrens of the Labrador interior, past the height of land and into Quebec in search of caribou.

The caribou provide a critical food supply for our people. The hides are used to make boots, mitts and clothes. Hunting these caribou means that we understand them, know how they behave, where they migrate and when, and respect the environmental factors necessary to keep the herd healthy and available to us.

Hunting these caribou often keeps an Inuk hunter out on the land under extreme conditions, far from his family and for a long time. Caribou hunting is an intensely personal experience

for our people. Our hunt of the caribou throughout our history expresses much of our culture and a large part of our heritage.

In spring each year, the caribou migrate to their calving grounds in Northern Labrador. These calving grounds are critically important to the growth and health of the herd and we have always protected them for that reason. The Labrador Inuit feel especially close to the herd because it does come to Labrador to calve. This creates a great protective feeling for the caribou and their habitat.

The question of what happens to these animals when they leave our territory is of vital interest to us. What happens in the territory which supports our wildlife, is as important to us and to our culture and economy as our land and the animals themselves. We want to know that when the caribou leave the Labrador calving grounds with their young, they are going to always come back.

3. LABRADOR INUIT RIGHTS AND INTERESTS IN THE HERD

The government of Quebec has agreed to negotiate with L.I.A. the outstanding claims of the Labrador Inuit in Quebec. These claims are based on traditional hunting, trapping, fishing and gathering activities that Labrador Inuit have always pursued throughout our territory northern Labrador and northern Quebec.

The government of Quebec and the federal government are well aware that the Labrador Inuit never surrendered their aboriginal rights to hunt, trap, fish and gather in northern Quebec. L.I.A. has made many submissions, to both governments, establishing this fact in an effort to get recognition of these rights for the Labrador Inuit in Quebec.

In its submission to the Commission Parlementaire de la Présidence du Conseil et de la Constitution (November, 1983) and in other communications with Quebec, L.I.A. has always taken the position that aboriginal rights to hunt, trap, fish and gather in Quebec need further protection through participation in environmental protection and land use regimes. L.I.A. has repeatedly stated that the establishment of a management regime over a

migrating species like the caribou must manage the entire population throughout its range, regardless of artificial boundaries, and must recognize the legitimate rights and interests of the people who hold the primary rights and interests in that resource. This is the essence of what L.I.A. means when it speaks of joint management.

4. CONCERNS AND ISSUES FOR THE LABRADOR INUIT

4.1 Concerns

4.1.1 Cause of the Drownings

The first question that must be asked, is why did the disaster happen? Many Inuit hunters in Northern Labrador believe that the drownings were likely related to the hydro development because, in our own history and experience with the herd we know of no drownings of this magnitude.. What our history and experience has taught us is a general mistrust and suspicion of the ability of industrial society to manage the impacts of its developments on the surrounding environment and wildlife. We believe that the Caniapiscaw River caribou disaster bears out our fears about the James Bay hydro development project and we are afraid that once again we will have to bear the costs of development.

L.I.A. believes that in determining the cause of this disaster governments should listen to evidence from Labrador Inuit hunters who can give them the benefit of their knowledge and wisdom of caribou migrations, behavior patterns and experience with natural disasters. The Labrador Inuit have lived and died at the hand of natural disasters. They know how natural disasters can change their world unexpectedly and in an instant. As a matter of survival they have become sensitive to the natural elements and interactions of their environment. This gives them an important perspective on natural disasters.

The knowledge, sensitivity, and intuition that the Labrador Inuit have come from living with the caribou for hundreds of years and are as much a part of understanding, cause, effect, and prevention as the data coming from industry and government. Scientific data is not infallible. L.I.A. believes that if the evidence from native peoples is not given equal consideration with the "scientific" data in a way that satisfies all major interests, the conclusions of the S.A.G.M.A.I. investigation will be dismissed by Labrador Inuit as biased, and the government will have completely destroyed any confidence that the Labrador Inuit may have in Quebec's management regime.

4.1.2 Isolation of Labrador Inuit

In all the attention that this incident has received there has been virtually no acknowledgment that the Labrador Inuit depend on the herd, and are affected by what happens to it. The flow of information, the details of the clean-up operation, and remedial plans have all by-passed the Labrador Inuit. In an effort to keep its membership informed, L.I.A. has monitored the various responses to the disaster and government actions to address it. This has not been an easy task.

Labrador Inuit are isolated from the management regime in both Quebec and Newfoundland. They have no forum, no process, and no way of conveying their concerns about the incident and how it may affect their ability to continue to hunt the caribou. Instead, distant governments are making value judgments about what is and what is not a legitimate interest for the Labrador Inuit in matters that affect their very livelihood. Decisions are made without their participation, without their views but at their expense.

In the absence of direct and continual information there is a real problem that misinformation will circulate. This will

only serve to increase hostility towards industry and governments, and L.I.A. is concerned that the Caniapiscau River Caribou disaster will create a very adversarial atmosphere between Labrador Inuit and government managers who are in charge of managing the Hebron/George River herd. This kind of atmosphere will preclude any effective cooperation between Labrador Inuit and the management regime; this is a direct threat to the future of the herd.

4.1.3 Adequacy of Environmental Protection

L.I.A. has concluded that the Quebec government was unprepared to deal with the cause of the disaster or to initiate immediate and appropriate remedial activities. It is apparent to L.I.A. that Quebec does not recognize the full implications of the disaster for joint management because Quebec has not provided for the direct involvement of Newfoundland's jurisdiction over that herd. By refusing to have a public inquiry, Quebec has denied all the native users who share the herd, and the other government that manages it, the opportunity to protect their interests directly by publicly examining and analysing all the evidence.

L.I.A. also believes that the general confusion surrounding Quebec's response to the Caniapiscau River caribou disaster clearly indicates that there are major weaknesses in the environmental and social regimes established for the territory north of 55° N under the James Bay and Northern Quebec Agreement. The very fact that the disaster could happen tells us that the regulation and monitoring of the hydro developments in the area is inadequate.

L.I.A. can see no evidence of provisions under this regime for speedy restitution to Quebec and Labrador native people for damages to their wildlife or environment.

Accordingly, L.I.A. believes that there is a need to take a very close look at where the weaknesses are in the system so that our ability to protect and manage the wildlife and the environment can be maximized. By doing this, we can learn things that will better equip all of us to manage the environment in a way that respects the wildlife and the harvesting rights of the native people of Quebec and Labrador.

4.2 ISSUES

4.2.1 Joint Management

The Caniapiscau River caribou disaster raises the issue for L.I.A. of the need for joint management. The disaster clearly shows us the problems associated with two provinces managing a migratory herd on a territorial basis rather than through a cooperative approach that respects the nature of the herd, its habitat and its users.

In the aftermath of the Caniapiscau disaster, there is no evidence of cooperation between governments despite shared management jurisdictions. Newfoundland called for a public inquiry but, like many other requests for an inquiry, it was ignored by Quebec. We have no evidence that Quebec has sought the views of Newfoundland's biologists or managers on this issue. There was no effort made to acknowledge that the rights and interests of the Labrador Inuit who depend on the herd may be affected by the events that occurred in Quebec.

L.I.A. believes that Newfoundland also failed on the issue by not holding its own inquiry into the disaster in an attempt to get the best information and analysis possible and

necessary for good management. As a government with management jurisdiction over the herd, Newfoundland too has an obligation to ensure the integrity of the herd and its availability to the native people.

The federal government also abdicated its responsibilities for the protection of the rights and interests of native people in Quebec and Labrador by deferring to federal-provincial sensitivities.

L.I.A. believes Quebec has tried to keep the impact of the drowning restricted to the effect on the herd of losing 10,000 animals. L.I.A. knows the herd is large and currently increasing and under present conditions can absorb the unexpected loss with little effect on its overall ability to reproduce itself. This is a consideration, but it is not the only issue.

The size of the herd may well be its biggest threat, in that everybody feels they can take what they want from the herd. Both Quebec and Newfoundland are supporting new proposals for commercial and sports hunts on both sides of the border and L.I.A. fears this may encourage competition for provincial quotas.

L.I.A does not casually dismiss the loss of 10,000 animals as insignificant because we are aware of these new proposals which will increase the takes in Quebec and Newfoundland. We are always aware of the unknown, the unpredictable, the natural peaks and crashes of the herd and so we are always concerned about its size..

We worry about the economic interests that are developing around this caribou herd. Through bitter experience, the Labrador Inuit have learned that when there is competition for or conflict over a resource, the interest that generates monetary return to governments and industry is the interest which is ensured protection usually at the expense of the aboriginal users or the resource.

For L.I.A., this raises the question of how these increasing and potentially competitive interests for quotas from the herd are going to be addressed. Right now that does not seem to be an issue for governments because governments do not set their sights as far in the future as native people do. It is, however, an issue for the Labrador Inuit, and it is essential for them that they be allowed to develop very clear rules and guidelines about how, and by whom, that herd is harvested under all conditions.

L.I.A. believes that a joint caribou management board would provide a management regime for the Hebron/George River caribou herd that would protect the animals, the environment and the native hunts in an integrated and cooperative approach. L.I.A. has looked at the Beverly-Kaminuriak Caribou Management Agreement which sets up such a board to deal with the management complications created by different jurisdictions.

The joint caribou management board has representation from the principal governments involved in management of the herd and the native people who harvest the herd. Cooperatively, through the board, they address issues like research, quota allocations, methods for regulating harvest, priority hunts, a caribou herd management plan, and a monitoring program that is intended to facilitate maintenance of productive caribou habitat.

Given an event like the Caniapiscau River caribou disaster, L.I.A. believes that a joint caribou management board based on the Beverly-Kaminuriak model would be in a position to establish, quickly, an inquiry that would have Native and government representation on it and that would have the participation of all governments, users, and other interested parties. The mandate of the board would go a long way to ensuring that political and territorial interests did not over ride management concerns. Its decisions would consequently have more credibility.

In the event that there was a need to impose or to re-allocate quotas among users in different provinces, the board would be the accepted authority to do this.

The point is that, regardless of the cause or the nature of any disaster, a joint caribou management board could respond more effectively than separate governments or interests because its mandate and its membership would protect the herd, its habitat, and the native harvesters as its primary function. It would provide a forum and a process that would be able to anticipate and address specific and broad management related issues in an appropriate manner.

L.I.A. believes that Quebec and Newfoundland should look at the joint caribou management board for the Beverly-Kaminuriak herd as a model for a similar approach to the management of the Hebron/George River herd. It is essential to do this now, while the herd is healthy and increasing.

L.I.A. urges Quebec to respect the shared nature of the Hebron/George River caribou herd by agreeing to the principle of establishing a joint caribou management board similar to the one established for the Beverly-Kaminuriak herd.

4.2.2 Environmental Protection Regime

Many people in Quebec have assumed that the L.I.A. would not be interested in how the hydro reservoirs in Quebec are managed because the Labrador Inuit are so far away from them; L.I.A. is in fact very much interested.

Land use regulations and environmental protection criteria dictate what activities can take place on the land and water and the terms and conditions that apply to those activities. L.I.A. is concerned about any disruption to habitat that may affect wildlife populations that the Labrador Inuit hunt, trap, fish and gather.

The James Bay and Northern Quebec Agreement separates into distinct regimes wildlife management and environmental protection in Northern Quebec. L.I.A. believes that this separation is one of the fundamental reasons why the system in Quebec has been incapable of addressing the issues arising out of the Caniapiscau River disaster. L.I.A. believes there is a need to consider how the wildlife management regime and the environmental protection regime might be more integrated so as to reflect more appropriately the interdependence between habitat, wildlife populations, harvesting activities, and developments.

L.I.A. believes that by integrating these regimes it will be easier to develop a basis for monitoring environmental changes in a way that they can be incorporated in a timely manner into wildlife management decisions. Responsible management depends on an ability to anticipate and predict, whenever possible, cause and effect relationships that reflect the interdependence of wildlife and environment. It depends on understanding what factors are critical to maintaining a healthy migrating caribou herd and what factors, both within our control and outside of it, can upset that balance.

4.2.3 Contingency Planning

The Caniapiscau River disaster has also demonstrated that there is a need for a contingency plan or process that can address an environmental disaster affecting the caribou and those who depend on the herd. This process needs to be able to deal with any situation and also needs to provide restitution to those whose interests have been affected.

The principles and operating guidelines of a contingency plan need to be worked out in advance, and must provide for a speedy, effective compensation regime which protects the interests of Native harvesters against real and apprehended damages to their wildlife, environment and harvesting rights.

5. SUMMARY AND RECOMMENDATIONS

The Labrador Inuit have direct and substantial and existing rights and interests in the herd which can be affected by disruption either to the herd or its habitat. L.I.A. believes that the drowning of 10,000 caribou on the Caniapiscau River in Quebec affects those rights and interests.

L.I.A. also believes that Quebec's refusal to hold a public inquiry into the Caniapiscau disaster violates the principle of cooperative and responsible management necessary to manage a migratory resource.

With the size of the herd increasing the governments of Quebec and of Newfoundland and Labrador are encouraging more economic ventures to harvest the herd. L.I.A. is afraid that a casual disregard on both sides of the border in the large "under-harvested" status of the herd will lead to competition for quotas and can set the stage for more disasters, either natural or man-made.

L.I.A. believes that the future of the Hebron/George River caribou herd and the livelihood of the Labrador Inuit depend on establishing a joint management regime that will

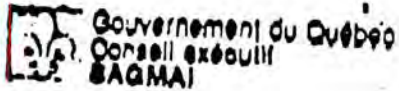
respect the migratory nature of the caribou herd, its habitat and the special relationships that the native people have with the herd.

Accordingly, L.I.A. recommends that:

1. S.A.G.M.A.I., in reviewing the Caniapiscou River caribou disaster and its implications for management, convey to the government of Quebec L.I.A.'s recommendation that a public inquiry is the best forum to serve the interests of the herd and the native people who depend on it. A public inquiry is critical to restoring the confidence of the Labrador Inuit in Quebec's management regime.
2. Quebec agree in principle to investigate establishing a joint management board for the Hebron/George River caribou herd.
3. Quebec consider how the current wildlife management and environmental protection regimes might be modified so as to improve its ability to address environmental problems that affect resource harvesting activities of the native people of Northern Quebec and Northern Labrador.

4. Quebec establish a system to remedy or prevent harm to wildlife or the environment which affects the hunting, trapping, fishing and gathering rights of the native people of Northern Quebec and Labrador. In addition to other alternatives there should be an out of court process and it should provide for dealing with the problem of burden of proof.

5. Quebec investigate, in consultation with the native peoples of Northern Quebec and Northern Labrador, establishing a comprehensive monitoring program that will involve monitoring the caribou and their habitat throughout their range as a way to help prevent future disasters like the Caniapiscau River drownings.



Gouvernement du Québec
Conseil exécutif
SAGMAI

Québec, January 7th, 1988

Votre adresse:

Notre adresse:

Mr. William Andersen III
President
Labrador Inuit Association
P.O. Box 70
Nain, Labrador
AOP 1L0

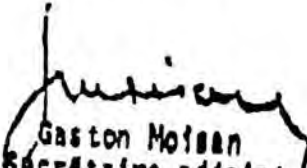
Re: Caribou Disaster

Dear Mr. Andersen:

Thank you for your letter of December 18. When I wrote you in November, we were under the impression that our inquiry into the caribou drownings could be finalized by the end of December. However, it was not easy to get all the information needed and to meet the people that had to be interviewed so that the inquiry is still going on. I doubt that the report may be ready before mid-February.

Since you insist to be heard about that matter, you might be willing to submit a brief or to present your case before or after the meeting in Montréal next week (January 16-18). We could meet there with the principal person involved in the inquiry.

Yours truly


Gaston Moisan
Secrétaire adjoint

Copy - Nathan Elberg



Labrador Inuit Association

P.O. BOX 70
NAIN, LABRADOR
A0P 1L0
TEL.: 931 OR 942

December 18, 1984.

Dr. Gaston Moisan,
Secrétaire adjoint,
S.A.G.M.A.I.,
875 Grande Allee est,
Quebec, Quebec.
G 5IR 4Y8

Dear Dr. Moisan:

Re: Caniapiscou River Caribou Disaster

Thank you for your letter of November 28 with respect to the Caniapiscou River Caribou Disaster.

LIA is aware that Premier Lévesque has referred the matter to SAGMAI for purposes of conducting an internal inquiry. LIA is also aware that the terms of reference for the internal inquiry include an examination of the causes of the disaster and possible steps that could be taken to prevent such a disaster from occurring in the future. I am disappointed that you have so far not acceded to our request to participate in any inquiry that may be conducted. I understood from the proceedings of the Commission Parlementaire in November, 1983, that the Québec Government would welcome consultation with the Labrador Inuit on issues related to our harvesting and with respect to management of the herd. I am puzzled that our first request for consultation, made in this particular context, has not been better received.

While LIA believes that a public inquiry is the appropriate forum for dealing with an issue as complex as this, LIA would welcome an opportunity to be heard during an internal inquiry. In that regard, I note your comment that the SAGMAI report will be made public in the next few weeks and I request that you move immediately to hear from LIA so that the concerns of the Labrador Inuit, especially as they relate to prevention of such incidents in the future, can be taken into account in the report.


I disagree with the implication contained in your letter that the distance of the Labrador Inuit from the site of the disaster limits the relevance of LIA's concerns or their participation in an inquiry. I also disagree with the suggestion that there are no management implications arising out of the disaster. Only a

The animals that were killed are of as much importance and concern to the Inuit of Labrador as they are to the people of Northern Québec. We have a vital and legitimate interest in ensuring that such disasters are avoided, if at all possible, in the future. In addition, we believe there are a number of management issues that arise from the disaster, not least of which is the possibility that disasters of this magnitude may require quota re-allocations.

Your comments respecting commercialization of the herd are noted. In that regard, I understand that your government has recently published a paper on the feasibility of commercialization and LIA would very much appreciate receiving a copy if available.

I look forward to hearing from you.

Bien à vous,



William Andersen III
President,
Labrador Inuit Association

cc: Premier René Levesque
Jacques Brassard
Mark R. Gordon
Chief Joseph Guanish
Chief Philip Awashish



Cabinet du Ministre

Québec, le 28 novembre 1984

Monsieur Chesley Andersen
Land Claims Director
Labrador Inuit Association
C.P. 70
Nain, Labrador
AOP 1L0

Monsieur,

Au nom du ministre du Loisir, de la Chasse et de la Pêche, monsieur Guy Chevrette, j'accuse réception de votre lettre du 26 novembre 1984 par laquelle vous transmettez copie de la lettre que vous acheminez au Dr Gaston Moisan relativement à la noyade de caribous sur la rivière Canapiscau.

Soyez assuré que votre correspondance sera portée à l'attention de monsieur le ministre afin qu'il puisse en prendre connaissance dans les plus brefs délais.

Veillez agréer, monsieur, l'expression de mes sentiments les meilleurs.


Yvon Cormier,
Attaché politique

Ref.: 7080



QUÉBEC, November 28, 1984

Mr. Chesley Andersen
Land Claims Director
Labrador Inuit Association
P.O. Box 70
NAIN (Labrador)
AOP 1LO

RE: Caniapiscou River Caribou
=====

Dear Mr. Andersen:

I acknowledge receipt of your letter of November 26 which was given to me by hand by Mr. Elberg. I regret that you did not receive a reply from Mr. Lévesque who usually refers that kind of correspondence to SAGMAI. But in the case of the caribou accident, there were many government departments concerned and many letters, so that there may have been an unfortunate delay.

As you know, there has been a request made by Makivik, and supported by many organizations, for a public inquiry. The Premier refused that request, the main reason being that Makivik demanded a complete review of the James Bay Project concept and operations, and indirectly of the James Agreement. A motion was tabled for the same purpose at the National Assembly and voted down.

This does not mean however that the caribou drowning was taken lightly. An internal inquiry is going on to find out exactly how the accident occurred, how it could have been prevented and most importantly, how we can all make sure that the management of the Hydro reservoirs shall not be held responsible for such accidents in the future. Mind you, if the caribou herd continues to grow, no one can say for sure that similar accidents will never occur again in the most natural conditions since migratory movements will go on, and may increase, and cross large rivers in normal or flooding conditions. The people in the South with little knowledge of caribou are not aware of that, but northern people know very well, and no negotiated or non-negotiated joint caribou management scheme will change that fact.

Makivik was sent the available information and was invited to cooperate with the inquiry on October 29, but no response has been received so far. I frankly do not see how your participation in finding out the causes of the accident would help very much since you are so far away from the site. This does not mean in any way that we ignore your interest in the result of the inquiry because of your interest in the herd itself. The report should be made public in the next few weeks.

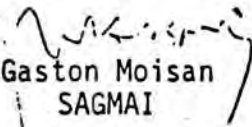
As to your remarks about my comments on Focus North on the commercial use of caribou, I have not had the opportunity to hear what they were. I suspect, however that a few excerpts from a 70 minutes interview were taken out of context. I said that Québec was analysing the results of a feasibility study and would take a decision later, after consulting with the Québec native parties. You are certainly aware that a lot of pressure from the Québec Inuit is being applied on the Québec Fish & Game Department to go ahead with this commercialization scheme.

In any case, we should have occasions to discuss all these matters when our negotiations get started.

Yours truly,

The Assistant Secretary

GM:jb


Gaston Moisan
SAGMAI



Labrador Inuit Association

P.O. BOX 70
NAIN, LABRADOR
A0P 1L0
TEL: 931 OR 942

November 26, 1984

BY HAND

Gaston Moisan,
Secrétaire adjoint,
S.A.G.M.A.I.,
875, Grande-Allée est,
Québec, Québec
G1R 4Y8

Re: Caniapiscou River Caribou Disaster

Dear Dr. Moisan:

I would like to reaffirm that L.I.A. believes a public inquiry should be conducted into the Caniapiscou River caribou disaster as soon as possible. We sent a letter to this effect to Premier Levesque on October 15, 1984, but we have not yet had any response and have not been consulted about the disaster or what the Quebec Government proposes to do about it.

I would also like to reaffirm that L.I.A. wishes to participate in any inquiry into the disaster because of the substantial and direct interests of the Labrador Inuit in the herd and our concerns about the establishment of an effective joint management arrangement with respect to the herd.

In view of the loss of approximately 10,000 animals at Limestone Falls and your comments on Focus North on Tuesday, 20 November, 1984, that Quebec is considering taking an additional 10,000 animals from the herd for commercial purposes, L.I.A.

.../2

November 26, 1984

Dr. Gaston Moisan,
S.A.G.M.A.I.

wishes to ensure that there is no doubt about our concern for that herd or about our view that there is compelling need for negotiations as to how the herd can best be managed by aboriginal users and governments.

Bien à vous,

Chesley Andersen
Land Claims Director
LABRADOR INUIT ASSOCIATION

CA/gp

c.c. Premier Levesque
Guy Chevrette
Mark R. Gordon
Chief Joseph Guanish
Chief Philip Awashish



Labrador Inuit Association

P.O. BOX 70
MAIN, LABRADOR
AOP ILU
TEL: (709) 922-2943

File: 44,001-1

October 15, 1964.

Rene Levesque,
Gouvernement du Quebec,
Cabinet du Premier Ministre,
885 Grande Allée est,
Edifice J, 3e étage,
Quebec, Quebec.
CIA LIA.

Dear Mr. Prime Minister:

The loss of 10,000 caribou on the Caniapiscau River deeply affects all the members of the Labrador Inuit Association (LIA) whose cultural activities are closely linked with the George River caribou herd. As traditional users of this herd, the Labrador Inuit have always respected the interdependence of the caribou and their environment and we have always acted in a way that maintains the integrity of this relationship.

Our main concern is and has always been responsible management of the George River herd. For us, responsible management ensures the conservation of the herd, respects as a priority, the continued hunting by aboriginal harvesters and provides for the full participation of the aboriginal harvesters in the management regime. While LIA appreciates that the George River caribou herd is currently large and healthy we do not know what management implications there will be as a result of the drowning of 10,000 healthy animals. In order to understand what this could mean for future management policies and quota allocations we have to have answers for many questions. More important we have to be in a position to make sure that something like this never happens again.

Accordingly, LIA urges the government of Quebec to establish a public inquiry to provide an appropriate forum to get the necessary answers that will help us understand how the loss of 10,000 healthy

animals might affect current and future management policies. A public inquiry with full participation from all the aboriginal user, including LIA, will also help restore confidence in efforts to develop an appropriate management regime.

LIA believes that the good will exists with all major parties to address the management implications of the Caniapiscau River disaster in the best interests of the conservation of the herd and the continued priority use by aboriginal harvesters.

As traditional users of this herd we have always had a special relationship with the caribou and therefore a special interest in the management of the herd. We also recognize that this herd represents a wildlife resource which is valued by all the residents of Quebec and Newfoundland and whose interests would also be served by a public inquiry.

Sincerely,

William Anderson III,
PRESIDENT,
LABRADOR INUIT ASSOCIATION.



Labrador Inuit Association

P.O. BOX 70
NAIN, LABRADOR
AOP 1L0
TEL.: (709) 922-2942

File: 44:001-1,

October 15, 1984.

Honourable Ms. Blais - Grenier,
Minister,
Department of Environment,
Ottawa, Ontario.

RE: CANIAPISCAU RIVER DISASTER

Clean up operations for the 10,000 caribou who drowned at the Limestone Falls site on the Caniapiscou River are almost complete. Now we all have to deal with the aftermath of the loss of 10,000 healthy animals from the herd.

Responsible cooperative management depends on a commitment from all major users to respect the principles of conservation and the priority use of the herd by aboriginal harvesters. LIA is very concerned about the implications for management and quota allocations that the loss of 10,000 animals will have and we feel that it is in everybody's interests to address these issues cooperatively. LIA urges both the federal Department of the Environment and the Newfoundland Department of Culture Recreation & Youth to press Quebec to hold a public inquiry into the Caniapiscou River disaster as the most effective way to get the answers we need and as a step towards establishing confidence with the aboriginal harvesters in the management regime. A public inquiry forum with full participation from all major users is the only way we believe that all parties can cooperate in a spirit that will serve the interests of the caribou and those who depend on the herd.

LIA would also like to suggest that funds from the Canada/ Newfoundland Conservation agreement be used towards establishing a special impact study group that would look at the management implications of the Caniapiscou River disaster. We recommend that this group be made up of representatives of the governments

of Canada, Newfoundland and Labrador and the aboriginal harvesters of Quebec and Labrador to a public inquiry.

Through the Canada/Newfoundland conservation agreement Canada contributes \$200,000 annually towards achieving the objectives of the agreement. The committee established under this agreement include the Regional Director from the Canadian Wildlife Service (CWS), Atlantic Regional, and the Director of the Wildlife Division for Newfoundland. Both these representatives have management and/or research interests in the George River caribou herd. Therefore this seems like a very appropriate service to contribute funds towards a better understanding of the management implications of the loss of 10,000 animals.

By urging Quebec to convene a public inquiry and by using funds from the Canada/Newfoundland Agreement for a research initiative the governments of Canada & Newfoundland & Labrador would demonstrate the commitment of both governments to management policies for the caribou herd which respect the relationship between the caribou and their habitat as well as the interests of the major users. It would also emphasize the importance of cooperative responsibility for the management of the herd.

The Labrador Inuit Association is anxious to participate in and cooperate with all efforts that work towards responsible management of the George River Caribou Herd.

Sincerely,

William Andersen III,
PRESIDENT, L.I.A.



Labrador Inuit Association

P.O. BOX 70
NAIN, LABRADOR
AOP 1L0
TEL.: (709) 922-2942

October 15, 1984.

File: 44:001-1

Honourable Mr. Rideout,
Minister,
Department Culture, Recreation
& Youth,
St. John's, Nfld.

RE: CANIAPISCAU RIVER DISASTER

Clean up operations for the 10,000 caribou who drowned at the Limestone Falls site on the Caniapiscau River are almost complete. Now we all have to deal with the aftermath of the loss of 10,000 healthy animals from the herd.

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LIA would also like to suggest that funds from the Canada/ Newfoundland Conservation agreement be used towards establishing a special impact study group that would look at the management implications of the Caniapiscau River disaster. We recommend that this group be made up of representatives of the governments

of Canada, Newfoundland and Labrador and the aboriginal harvesters of Quebec and Labrador. The work of this group could provide a valuable contribution to a public inquiry.

Through the Canada/Newfoundland conservation agreement Canada contributes \$200,000 annually towards achieving the objectives of the agreement. The committee established under this agreement include the Regional Director from the Canadian Wildlife Service (CWS). Atlantic Regional, and the Director of the Wildlife Division for Newfoundland. Both these representatives have management and/or research interests in the George River caribou herd. Therefore this seems like a very appropriate service to contribute funds towards a better understanding of the management implications of the loss of 10,000 animals.

By urging Quebec to convene a public inquiry and by using funds from the Canada/Newfoundland Agreement for a research initiative the governments of Canada & Newfoundland & Labrador would demonstrate the commitment of both governments to management policies for the caribou herd which respect the relationship between the caribou and their habitat as well as the interests of the major users. It would also emphasize the importance of cooperative responsibility for the management of the herd.

The Labrador Inuit Association is anxious to participate in and cooperate with all efforts that work towards responsible management of the George River Caribou Herd.

Sincerely,

William Andersen III,
PRESIDENT, L:I.A.

c.c. Honourable Ms. Blais-Grenier

(709) 922-2942

File: 44:001-1

October 10, 1984.

Honourable Mr. Rideout,
Minister,
Department of Culture, Recreation
& Youth,
St. John's, Nfld.

Dear Mr. Rideout:

Your recent announcement calling for a public inquiry into the drowning of 10,000 caribou at the Carriacou Fiver is a statement that the Labrador Inuit Association (LIA) strongly endorses.

I know that you are well aware of how deeply affected the Labrador Inuit are by this disaster. I also know that your department is very concerned about what has happened and that we all understand what this means for cooperative management.

LIA has also urged the Quebec government to establish a public inquiry so that we can get answers and as an important step in restoring the confidence of all the major users in the management regime. A copy of the letter which LIA sent to Quebec is attached for your information.

The need for responsible cooperation and participation by all major users in a joint management regime is critical to the welfare of the George River caribou herd. LIA would like to work with your department in trying to develop an appropriate joint management regime that respects the interests of all major users.

I look forward to meeting you and discussing ^{our} mutual concerns about the management of the George River caribou herd.

I wish you luck in your new portfolio.

Sincerely,

William Andersen III,



Bureau du sous-ministre

Sainte-Foy, le 28 janvier 1985

Monsieur Peter Jacobs
Président de la Commission de la
qualité de l'environnement Kativik
Université de Montréal
5829, rue Darlington
Montréal, QC H3T 1T2

OBJET: Déplacement des carcasses de caribou le long
de la rivière Caniapiscou
Notre dossier: 000-BJ342-10

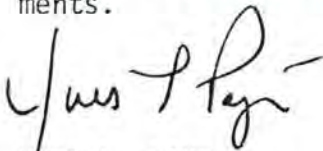
Monsieur,

Au nom du sous-ministre de l'Environnement, monsieur Pierre B. Meunier, je vous transmets une (1) copie des renseignements préliminaires du projet mentionné en titre. J'en transmets également une (1) copie aux autres membres de la Commission ainsi qu'à son secrétaire.

Ces renseignements ont été adressés au sous-ministre le 25 janvier dernier par monsieur Willie Watt, secrétaire-trésorier de la Tuktuk Assistance Corporation, promoteur de ce projet.

Conformément à l'article 195 de la Loi sur la qualité de l'environnement, je vous demande de faire parvenir au sous-ministre dans les meilleurs délais, les recommandations de la Commission concernant le besoin d'étude des impacts de ce projet sur l'environnement et le milieu social.

Veillez agréer, Monsieur, l'expression de mes meilleurs sentiments.



YVES L. PAGE

c.c.: Pierre B. Meunier, sous-ministre
A.R.K., a/s du secrétaire et une (1) copie des rens. prélim.
Jean-Paul Noël, dir. rég. int. (10) et une (1) copie des renseignements prélim.

TUKTU ASSISTANCE CORPORATION
Kuujjuaq, Quebec

January 25, 1985

Mr. Pierre B. Meunier
Deputy Minister
Ministère de l'Environnement
2360 Chemin Ste-Foy
121^{ème} étage
Québec, Québec

Re: Project Respecting the Clean-Up
and Removal of Caribou Carcasses
(the "Project")



Dear Mr. Meunier:

We are pleased to provide you with a description of the above-mentioned Project with a view to obtaining, within the shortest possible delay, such authorizations as may be required from the Ministère de l'Environnement.

Stated briefly, the Project involves the employment of a work force of approximately 115, principally residents of Kuujjuaq, to:

- locate the various sites where carcasses were dumped following the disaster on the Caniapiscau River;
- collect and transport the carcasses to one or more convenient stockpile areas in the vicinity of the disaster area;
- remove by-products from the carcasses (antlers, tails, etc.);

- carry out the trans-shipment of the carcasses from the disaster area, down the Caniapiscau River, to a site on the river bank located approximately one-quarter mile from Kuujjuaq airport;
- arrange for the trans-shipment of carcasses from Kuujjuaq to Montreal (Dorval Airport) in containers ("Igloo" type) via Nordair;
- arrange for the taking of possession and handling of the said containers by the authorized holder of a dismembering plant permit (permis d'atelier d'equarrissage; catégorie fondoir) and for trans-shipment to the permit-holder's rendering plant for processing into:
 - (i) tallow (huiles) for resale by the permit-holder to soap makers, and
 - (ii) protein solids (farines) for resale by the permit-holder to animal feed producers for use as a component in animal feed.

The Project is described in detail below. At this point, it would be useful to review some of the events and decisions which have led to the formation of the Project.

BACKGROUND

In September 1984, the carcasses of approximately 10,000 caribou were found along both banks of the Caniapiscau and Koaksoak Rivers, downstream of Limestone Falls where they had either fallen to their deaths or drowned while crossing the Caniapiscau River.

Because of fear of the onset of winter freeze-up and the resulting trapping of carcasses in the rivers, the major remedial measure decided upon at that time was to remove carcasses a short distance from the rivers with the assistance of helicopters.

The clean-up operations were conducted by an emergency clean-up committee composed of representatives of the Northern Village Corporation of Kuujjuaq, the Kativik Regional Government and Makivik Corporation.

As a result, approximately 9,600 caribou carcasses are spread-out in dumpsites located between 1/4 and 1/2 mile from the rivers along a shoreline of approximately 20 miles. We understand that the Ministère de l'Environnement provided the principal funding for the foregoing activities and directly related measures.

While differing views were expressed, the prevailing opinion of local institutions, groups and individuals in Kuujjuaq was that the carcasses should eventually be removed from their present location and not simply be left to decompose.

Local Inuit, with the support of the Northern Village Corporation of Kuujjuaq and Nayumivik Corporation (Landholding Corporation of Kuujjuaq), undertook the planning of a project which would both remove the carcasses and at the same time provide local employment, as well as the possibility of gaining experience in dealing with the disposal or sale of carcasses and their by-products.

With a view to ensuring the unified expression of local community views on specific issues and, in particular, the caribou carcass issue, various local groups formed the Kuujjuaq Wildlife Federation.

The Kuujjuaq Wildlife Federation is composed of representatives of the Northern Village Corporation of Kuujjuaq, Nayumivik Corporation (the local Landholding Corporation), Fort Chimo Co-operative Association (the local co-op), Caribou Ungava Limited (a local commercial enterprise), the Unguviak Wildlife Committee (representing local hunters) and the undersigned, Tuktu Assistance Corporation, which has been formed to carry out the proposed Project.

The Kuujjuaq Wildlife Federation has designated Tuktu Assistance Corporation to be the proponent of the Project and adopted a resolution in that regard on November 26, 1984 which remains in effect. Moreover, Makivik Corporation has also adopted a resolution on December 5, 1984 expressing its support for the efforts of Tuktu Assistance Corporation to effect the clean-up of the carcasses, which resolution also remains in effect.

Discussions were initiated with the governments of Canada and Quebec with a view to:

- (i) advising both governments as to the necessity of the Project;
- (ii) obtaining agreement and support, including financial and technical support, for the Project; and

(iii) to the extent necessary, coordinating the activities which were proposed to be carried out.

Inuit representations with respect to this Project included a letter to the Hon. Brian Mulroney, Prime Minister of Canada, from Johnny E. Watt, Mayor of the Northern Village Corporation of Kuujjuaq and Mr. Sandy Gordon, Jr., President of Nayumivik Corporation, dated October 29, 1984, requesting the Prime Minister's intervention in view of his special responsibilities as M.P. for the riding of Manicouagan. Communication was also made, at the same time, with the Hon. René Levesque, Prime Minister of Quebec, in view of his responsibility for SAGMAI.

On November 13, 1984, a group of Kuujjuaq Inuit (Willie Gordon, Jackie Koneak, Charlie Gordon and Charlie Watt), on behalf of and with the approval of the Northern Village Corporation of Kuujjuaq and Nayumivik Corporation, attended a meeting in Quebec with the Hon. Guy Chevrette, then Ministre du Loisir, chasse et pêche, at which the proposed carcass removal Project was discussed in detail.

Mr. Chevrette expressed his support for the Project and undertook to issue such authorizations as might be necessary to enable Tuktu Assistance Corporation to deal with the by-products. The Minister also offered, on behalf his Ministère, to intervene with the Ministère de l'agriculture, pêcheries et alimentation in particular, and with other Ministères to help obtain any other authorizations which might be required.

On November 29, 1984, at Mr. Chevrette's request, a detailed proposal was submitted to MLCP with a view to providing the Minister with such information as he needed to give effect to the foregoing.

Since that time, we have had ongoing discussions with MLCP representatives who have continued to indicate their support for the Project. They have also advised, at least orally, that the Inuit could validly dispose of byproducts of the caribou. With respect to the flesh (chair) of the caribou carcasses, MLCP representative are considering the adoption of an amendment to an existing regulation to cover the specific Caniapiscau disaster situation. The amendment would authorize the disposal of the carcass meat for a defined period if this aspect is not covered by other regulations (such as the Regulation respecting food, (R.R.Q c. P-29,r.1) adopted under the Agricultural Products, Marine Products and Food Act, R.S.Q. c. P-29, s.40).

We have also been in contact with the Ministère de l'agriculture, pêcheries et alimentation to determine with them what authorizations might be required in view of the special circumstances pertaining to this case and what arrangements we might make to ensure that reasonable hygiene considerations are taken into account.

RECENT DEVELOPMENTS

In December, 1984, pursuant to an application by Tuktu Assistance Corporation to the Canada Employment and Immigration Commission under the Canada Works Program, Canada approved, in principle, funding of up to \$815,000 for the activities contemplated by the Project, including the employment of labour, establishment of work camps and preparation of carcasses for transport to Kuujjuaq and from Kuujjuaq to Montreal (Dorval).

Tuktu Assistance Corporation has continued its preparations with respect to the logistics of the Project (recruitment of labour, acquisition of supplies, capital equipment, arrangement of transport, arrangements for disposal of carcasses, etc.) and on January 23, 1985, entered into a Contribution Agreement with the Canada Employment and Immigration Commission to carry out the Project, subject to the conditions normally applying in such contribution agreements, including the obtention of any necessary authorizations.

It has been indicated to Tuktu Assistance Corporation and other Inuit representatives on several occasions during the above-mentioned period that the Quebec government, including the Ministère de l'Environnement, was in agreement, in principle, with the Project. We understand, in fact, that Canada's decision to extend funding and support for the Project was made after direct consultation, initiated by the Prime Minister of Canada's office, between the Ministre de l'Environnement (Canada) and the Ministre de l'Environnement (Quebec).

It was indicated, furthermore, that the Ministère de l'Environnement (Quebec) offered to coordinate the activities of the different provincial departments involved, particularly where they pertained to authorizations.

Finally, we understood that the Hon. Adrien Ouellette, Ministre de l'Environnement, wished us to attend a meeting with him to review the Project in detail. We tried unsuccessfully to arrange such a meeting on the date suggested, namely, January 16, and were advised that the

Minister was unavailable. The Minister's office subsequently was obliged to cancel the meeting which had been previously scheduled with, among others, Mr. Johnny Watt, Mayor of Kuujjuaq, on January 23.

We refer to the foregoing solely for the purpose of assuring you that our efforts to collaborate with the Quebec government, including the Ministère de l'Environnement, on this Project date back to more than two months before the date of this letter.

PROJECT JUSTIFICATION AND PURPOSE

As stated above, the prevailing opinion of the Kuujjuaq Community was that the carcasses should be removed from the disaster site and not simply be left to decompose.

At the time of the initial clean-up, the Mayor of Kuujjuaq, Mr. Johnny Watt, agreed to the emergency measures on the understanding that there would be a second phase involving removal of the carcasses.

The Kuujjuaq Community believes that almost 10,000 rotting carcasses cause a sufficient environmental threat to the habitat along the Caniapiscau and Koksoak Rivers to warrant their removal. While the ultimate impact would only be known in the future, the Community is fearful of any possible outbreak of disease among the fox population, of the possible increase of wolf packs in the Kuujjuaq area and of the possible future change of Caribou migration routes.

Projections that the caribou carcasses would lead to greater trapping of foxes have proven unfounded. Inuit families camping in the area of the disaster until November 20th, reported that there was no increase in the numbers of those animals trapped. Moreover, the carcasses are located among trees where foxes are not generally trapped in any sizeable numbers.

The choice of leaving or removing the blight of almost 10,000 carcasses on the landscape, even though located in an "unpopulated" area, seems obvious. The added consideration of providing employment for approximately 115 individuals at a time when such employment is least available in the area seems more than ample justification for the Project. Our representatives have had informal discussions with representatives of the Soci t  d'nergie de la Baie James in which the latter indicated that it was obviously preferable to remove the carcasses.

PROPONENT

Tuktu Assistance Corporation has been incorporated under Part II of the Canada Corporations Act as a non-profit entity for the purpose of carrying out, directing and administering the Project and any activities related to or arising out of the Project.

The head office of the Corporation is in Kuujjuaq and the directors and officers of the Corporation are the following individuals, all from Kuujjuaq, Quebec:

Willie Gordon, President, Willie Watt, Secretary-Treasurer, Edward Koneak, Director, Johnny Adams, Director.

Those eligible to be members of the Corporation are the Inuit residents of Kuujjuaq who are of the age of majority and affiliated to the said community of Kuujjuaq within the meaning of the James Bay and Northern Quebec Agreement.

NATURE AND SCOPE OF THE PROJECT

The Project contemplates the following activities:

- a) The establishment of five (5) work camps along the Caniapiscou and Koaksoak Rivers and of trails from the dumpsites to the Rivers. A map of the worksites is attached as Schedule "A".

The work force will spend considerable time setting up camps, establishing trails in rough terrain and in locating and digging out the various dumpsites where carcasses were placed.

- b) Collection and transport of the carcasses in their frozen state to one or more convenient stockpile areas in the vicinity of the disaster area.

This work will be carried out by numerous work parties which will establish storage areas on raised platforms on which the carcasses or parts thereof will be stored out of reach of other animals.

- c) The preparation of carcasses for shipment and the building of wooden sleds to transport them from the disaster site to Kuujjuaq;

By-products (antlers, tails, etc.), will be removed from the carcasses and the remainder of the carcasses will be prepared for shipment to Kuujjuaq. As in the case of the other phases, this work will be carried out over several weeks during which time the logistics involved in the transport of the carcasses will be worked out. It is likely that the carcasses will be shipped whole to Kuujjuaq.

- d) The shipment of carcasses and by-products by snowmobiles and sleds to Kuujjuaq and the loading of containers on arrival in Kuujjuaq;

It is proposed that the sleds would be unloaded at a depot located approximately one quarter of a mile from Kuujjuaq airport. The carcasses would be immediately loaded (while frozen) into containers provided for that purpose by the transporter, Nordair, and delivered to the Kuujjuaq airport.

- e) The transport of carcasses from Kuujjuaq airport to Montreal (Dorval airport);

Arrangements have been made with Nordair in connection with the trans-shipment of carcasses to Dorval airport in Montreal. Nordair will supply a quantity of fully-enclosed, fiberglass containers (Igloo type) for shipment purposes. The containers are approximately 108" X 88" X 6'

and are estimated to store at least 3,000 pounds of cargo. (Nordair would also keep on hand a number of flat pallets upon which carcasses could be tied down and covered. It is not foreseen that such pallets would have to be used, but they will, nevertheless, be provided for back-up purposes).

Tuktu Assistance Corporation will ensure that the containers are loaded and delivered to Nordair ready for loading on the plane. Nordair operates daily flights (except Sunday) out of Kuujjuaq and carcass shipment will be made on a "space available basis". Space available on any given day can range between a maximum of 22,000 pounds and a minimum of 3,000 pounds.

The rate of delivery of carcasses from the disaster site to Kuujjuaq will be coordinated so as to ensure a minimum period of storage at the depot in Kuujjuaq.

In view of the importance of transport arrangements, we have attached as Schedule "B" a copy of a letter dated January 25, 1985 from Nordair to Caribou Ungava Limited and Tuktu Assistance Corporation concerning the foregoing.

f) The marketing and disposal of carcasses and by-products;

Tuktu Assistance Corporation has made arrangements with Caribou Ungava Limited to dispose of and/or market the carcasses and by-products.

Revenues to Tuktu Assistance Corporation in this connection will be applied to the expenses incurred in carrying out the Project. Surpluses resulting to Tuktu Assistance Corporation in this connection would be distributed or reinvested in the Community in a manner approved by the Community as a whole, and consistent with any rules under which funding from government agencies may have been received.

- g) The shipment of carcasses from Kuujjuaq to Montreal and the handling upon arrival in Montreal;

Caribou Ungava Limited, in consultation with Tuktu Assistance Corporation, has made arrangements for the handling of the caribou carcasses upon arrival in Montreal.

Lorenzo, a division of Les Moulins Maple Leaf Limitée, has offered its services to receive and process the carcasses upon their arrival at Dorval airport. Lorenzo holds rendering permits from the Department of Agriculture (Canada) as well as the Ministère de l'Agriculture (Québec).

Lorenzo will make arrangements to have the Nordair containers loaded directly onto flat-bed trucks for shipment to Lorenzo's rendering plant in Ville Ste-Catherine (near the Pont Mercier in Montreal). The carcasses will be rendered in accordance with the procedures normally applied in such rendering plants and the containers will be similarly steam-cleaned in accordance with the

conditions normally applying in such plants, prior to their return to Nordair. The proposed manner of handling the carcasses prior to their arrival at the plant will in no way affect the rendering of the carcasses in accordance with normal procedures and rules.

Again, in view of the importance of the handling of the carcasses, we have deemed it useful to attach hereto as Schedule "C", a copy of a letter dated January 25, 1985 addressed to Tuktu Assistance Corporation and Caribou Ungava Limited from Lorenzo in connection with the foregoing.

PROJECT TIMING

Most parts of the Project which pertain to the handling and shipment of the carcasses must get underway within the shortest possible delay. The work force will be operating in difficult terrain, under adverse weather conditions. Because of delays already incurred, the task of locating as many of the dumpsites as possible will be considerable. While it is hoped to locate and eventually remove and dispose of as many of the carcasses as possible, it is estimated that at least 6,000 carcasses will be able to be located and handled.

Insofar as the carcasses will be handled in their frozen state and in view of the weather conditions, Tuktu Assistance Corporation intends to complete that part of the Project relating to the transport, removal and disposal of the carcasses by April 30, 1985 at the very latest. As has been explained to all concerned, further delays will seriously prejudice the viability of the Project.

CONCLUSION

We trust that the foregoing Project description will provide you with the necessary information to take the measures required to issue any required authorizations. It has been obvious from the outset that this Project is of a special nature in that it has been proposed to deal with a special situation which was not of our making, but which, nevertheless, seriously affects us.

It seems to us evident that the Project will accomplish the short-term goals of cleaning up, once and for all, what amounts to an environmental disaster. The experience we shall gain in dealing with the Project will also likely be of benefit in connection with future issues relating to plans to commercialize the caribou resource.

We hope that this information will put to rest any misinformation in connection with the Project, which unfortunately has led to the threat of injunction by representatives of your Department. We have had discussions with your representatives as to whether this Project is really one which is contemplated by Annexe "A" of the Loi sur la qualité de l'Environnement. In our view this Project, which contemplates a one-time operation to deal with a particular disaster, is not "a system for the collection and disposal of solid waste" within the meaning of paragraph (f) of Annexe "A". The reference to "system" is clearly meant to refer to the establishment of a permanent system of operations and the moveable and immoveable property set aside for such purposes, as is apparent from the definition of "waste management system" in section 1(12) of the said Act.

In any event, if the Ministère maintains the opinion expressed to date in the foregoing connection, it seems clear that those parts of the Project which would be affected by your classification must, if they are to commence, be commenced quickly. In such event, we submit that it would be necessary in the public interest to adopt the exemption measures contemplated by section 203 of the said Act.

This submission with respect to the Project must, of course, be made under reserve of the foregoing arguments. It is, nevertheless made with a view to obtaining all the necessary authorizations as soon as possible and to cooperating fully with you in that regard. We would therefore be pleased to provide you with such other information as you may require.

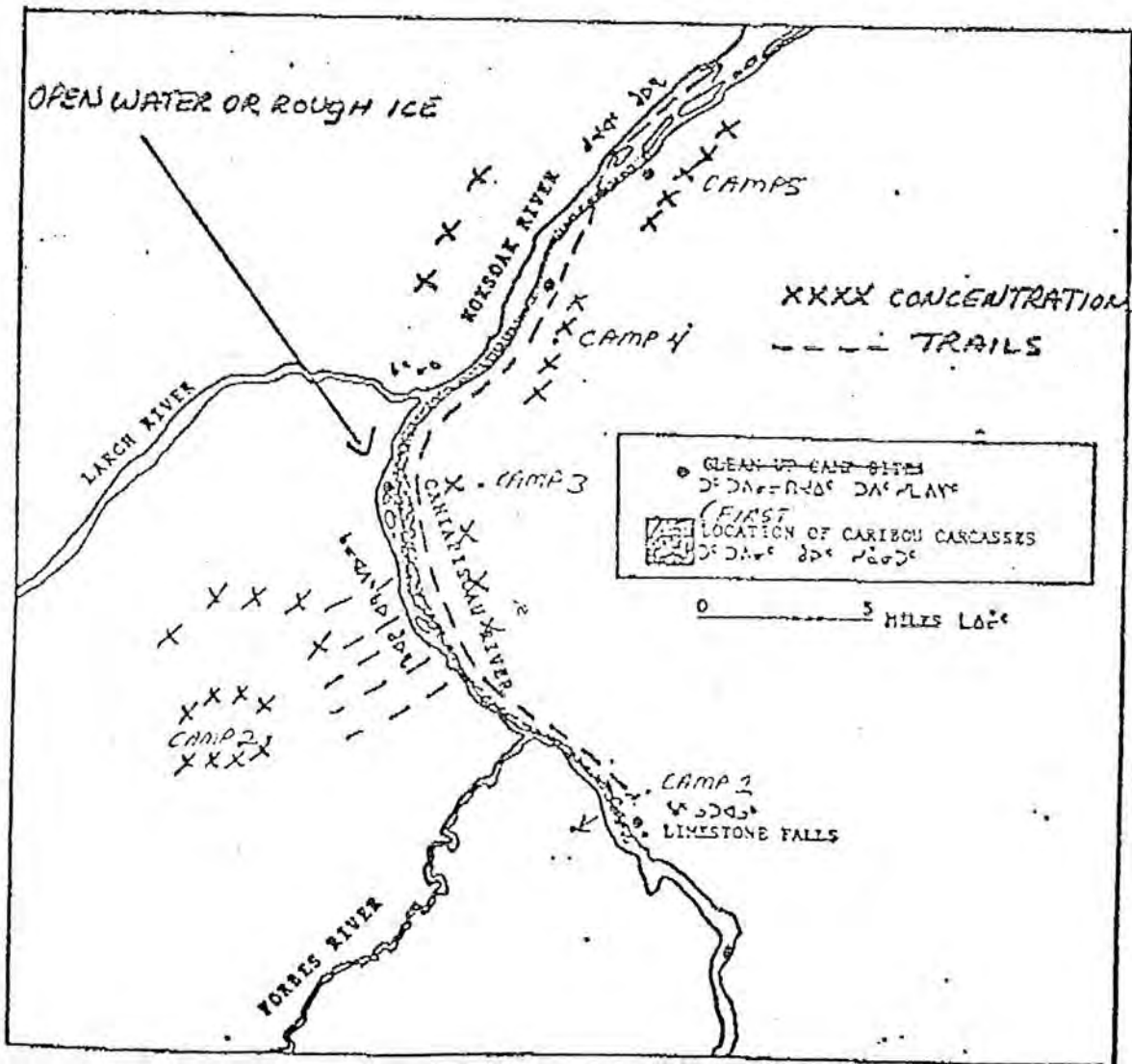
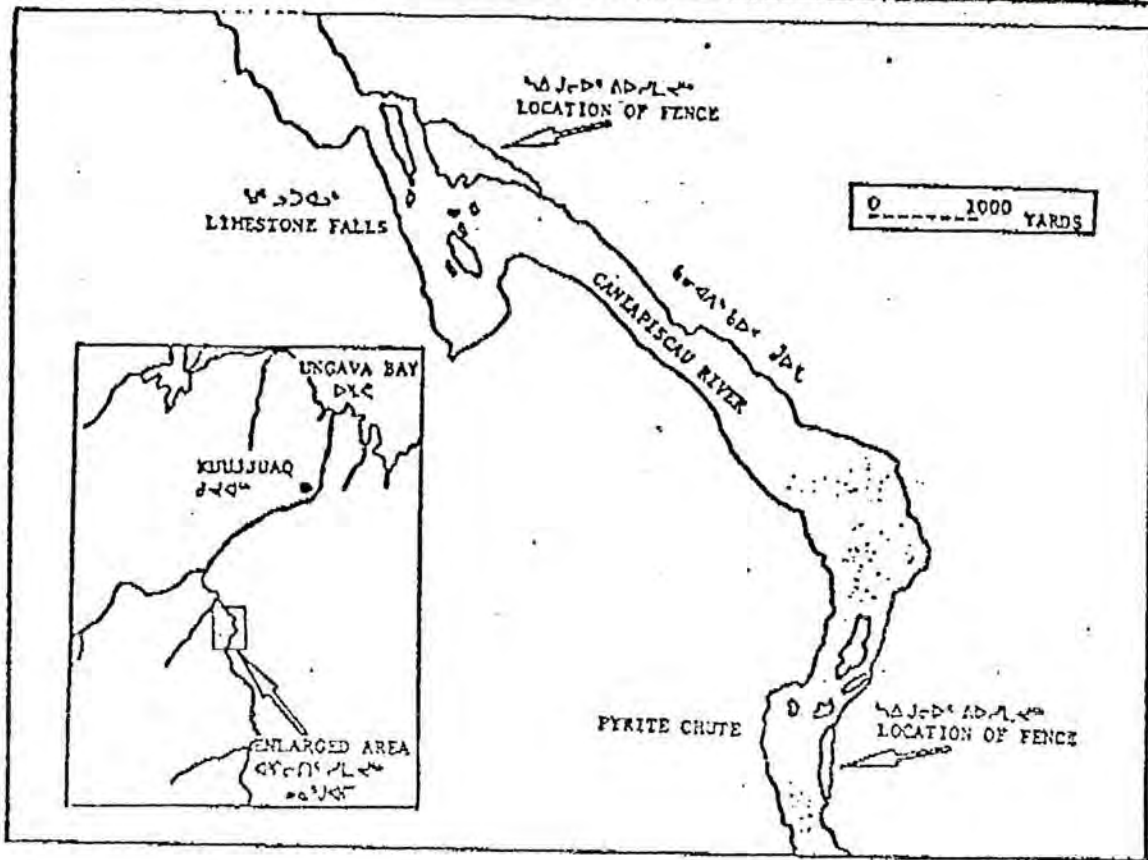
Yours very truly,

TUKTU ASSISTANCE CORPORATION

Per:

Willie Watt, U.K. per ccs.
Willie Watt,
Secretary-Treasurer

WW/ccg
Enclosure



LEGEND

XXXX CONCENTRATIONS OF CARCASSES
 --- TRAILS

CLEAN UP CAMP SITES
 D' DAFF'RD' DA' PLAY
 (FIRST LOCATION OF CARIBOU CARCASSES)
 D' DAFF' RD' DA' PLAY

0 5 MILES LOC



Schedule "B"

C.P. 4000
Bureau aéropostal
Aéroport International
de Montréal, Dorval, Qué.
H4Y 1B8

Tél. (514) 364 7700
Télex 05 821894

Le 25 janvier, 1985

Caribou Ungava Ltd.
Kuujuaq, Québec

et

TUKTU Assistance Corp'n

A l'attention de M. Willie Watt

Messieurs,

Pour faire suite à nos discussions avec vos représentants, ayant trait au déplacement des carcasses de caribous entre Fort-Chimo et Montréal, je suis en mesure de vous confirmer ce qui suit:

Le tarif applicable sera de 0.13 la livre et sera en vigueur à partir du 14 janvier 1985 et ce, seulement pour le transport des bêtes impliquées dans le désastre de la Caniapiscou.

Il est aussi entendu que vos sociétés auront la responsabilité de faire ou faire faire le nécessaire:

- 1) à Fort-Chimo, de nous remettre une cargaison sur une de nos palettes ou dans nos containers (IGLOO) prête pour l'embarquement, et
- 2) à Montréal, d'assurer le transbordement sur un camion remorque dans les plus brefs délais.

Il est évidemment entendu que cette cargaison sera transportée seulement si elle est congelée.

Osant espérer le tout à votre satisfaction, nous demeurons,

Bien à vous,

Frank Kirkman
Gérant des Ventes, Northern Division

Laurensco dule "C"

Le 25 Janvier 1985.

Tuktu Assistance Corporation
et
Caribou Ungava Limitée

Messieurs,

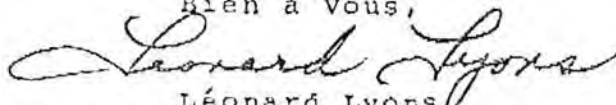
Nous désirons par la présente offrir les services de notre compagnie pour recevoir et transformer les carcasses de caribous que vous allez acheminer dans des containers jusqu'à l'aéroport de Dorval. Notre usine fait partie du groupe des fonderies de "Les Moulins Maple Leaf Ltée" et détient un permis d'atelier d'équarissage de catégorie fonderie émis par le Ministère de l'Agriculture du Canada (Permis R-606) ainsi que du Ministère de l'Agriculture du Québec (Permis F-02).

Nous opérons notre usine à Ville de Ste.Catherine depuis 1966 où nous employons quelque soixante et dix personnes.

Ainsi nous sommes disposés à recevoir, à compter de maintenant, les bêtes impliquées dans le désastre de la rivière Caniapiscou. Nos installations nous permettraient de recevoir une quantité maximale de 150,000 livres par semaine. Nous comprenons que les caribous peuvent être entiers ou en pièces, mais sans panaches. Nous transporterons les containers jusqu'à notre usine où nous laverons l'intérieur de ceux-ci après les avoir déchargés. Nous comprenons également que le transport des carcasses débutera au courant du mois de février pour se terminer approximativement au 30 avril 1985. Cette proposition vous est offerte jusqu'au 30 avril 1985.

Il nous fera plaisir de vous fournir toute information supplémentaire qui pourrait vous être nécessaire et nous osons espérer que notre offre sera accueillie favorablement.

Bien à Vous,


Léonard Lyons
Gérant Général

copie: M. Keith Morgan
Secrétaire Particulier du
Premier Ministre du Canada
Edifice Langevin, Ottawa, Ont.

Laurenco Schedule "C"

January 25, 1985.

Tuktu Assistance Corporation
and
Caribou Ungava Limited

Dear Sir,

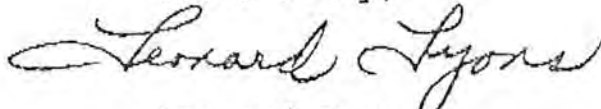
We wish to offer the services of our company to receive and process the caribou carcasses which you will be transporting to Dorval airport. Our plant is part of the rendering division of Maple Leaf Mills Ltd., and holds rendering permits from the Department of Agriculture of Canada (Permit R-606) as well as the Department of Agriculture of Quebec (Permit F-02).

We have been operating our plant in Ville Ste.Catherine since 1966 where we employ some seventy people.

We are prepared starting immediately to receive the animals which were involved in the Caniapiscou River disaster. Our plant can receive a maximum quantity of 150,000 pounds per week of caribou. These caribou will be whole or cut into pieces but will be without antlers. We understand that the carcasses will not commence to be shipped until their transportation to Kuujjuaq commencing sometime in February and ending approximately on April 30th. This offer is open for your acceptance until April 30th, 1985. It is understood that you will be loading the carcasses into containers. These containers will be transported from Dorval airport to our plant where we will wash the inside of the containers after they have been unloaded.

It will be our pleasure to supply you with any additional information that you might require and we sincerely hope that our offer will be looked upon favourably.

Yours Truly,



Leonard Lyons
General Manager

Copy: Mr. Keith Morgan
Executive assistant to the Prime Minister of Canada
Langevin Building
Ottawa, Ontario



Société d'énergie de la Baie James

800, boulevard Maisonneuve est, Montréal (Québec) H2L 4M8 Tél.: (514) 844-3741

Le 16 novembre 1984.

Monsieur Michel Beaulieu
Ministère de l'Environnement du Québec
2360 chemin Ste-Foy
Québec (Québec)
G1V 4H2

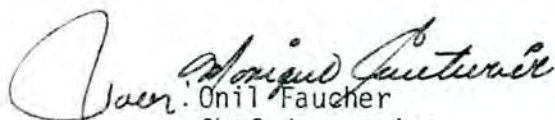
Monsieur,

Pour faire suite à l'appel téléphonique de monsieur Peter Jacob, vous trouverez ci-joint huit (8) exemplaires (4 exemplaires français et 4 exemplaires anglais) du document préparé par la SEBJ, intitulé:

"Considérations relatives à l'Hydrologie et l'Hydraulique de la rivière Caniapiscou en rapport avec l'accident des caribous survenu vers le 30 septembre 1984".

Monsieur Jacob nous informe que ce document sera présenté lors de la prochaine réunion de la "Commission de la qualité de l'environnement Kativik."

Nous vous prions d'agréer, monsieur, l'expression de nos meilleurs sentiments.


Onil Faucher
Chef de service
Etudes d'Environnement

MDC