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Comité consultatif de l'environnement Kativik
Kativik Environmental Advisory Committee

October 7, 2013

Mr. Sandy Gordon
Member-Commission for the management of residual materials
P.O. Box 9
Kuujuuaq, Q.C.
J0M 1C0

SUBJECT: The KEAC's comments to the commission for the review of the draft Nunavik Residual Materials Management Plan

Dear Mr. Gordon,

The Kativik Environmental Advisory Committee (KEAC) was created pursuant to Section 23 of the James Bay and Northern Québec Agreement (JBNQA) and is governed by the Environment Quality Act (R.S.Q., c. Q 2) and the James Bay and Northern Québec Native Claims Settlement Act (S.C. 1976-1979, c. 32). The KEAC acts as a consultative body for responsible governments regarding environmental and social protection in Nunavik (JBNQA, paragraphs 23.5.24 and 23.5.25). The KEAC is therefore the preferential and official forum for the governments of Canada and Québec, as well as the Kativik Regional Government and the northern villages.

The KEAC's review of the Draft Nunavik Residual Materials Management Plan has touched upon several issues the KEAC has addressed in past years. The KEAC is pleased to see that steps are being proposed to effectively treat these issues as presented in the pilot projects described in the Management Plan. As such, we support the set of universal orientations and their associated objectives presented in the Management Plan to guide the realization of the pilot projects presented therein. These include:

- 1-Cultivating and enhancing an understanding of residual materials management at the local and regional levels.
- 2-Establishing methods for the management of residual materials that encompass the principles of sustainable development and are adapted to suit the particularities of Nunavik.
- 3-Provide regional-level technical support to the Northern Villages in the realization of the objectives put forth in the Management Plan.
- 4-Sustain costs for the treatment of residual materials that are socially and economically acceptable.

Furthermore, the KEAC commends the efforts of the KRG in the implementation of the Management Plan since the treatment of residual materials in Nunavik is one of our committee's priorities. In recent years, the KEAC has undertaken various initiatives in this regard. These include: the development of residual hazardous materials guides, proposing alternative solid waste reduction methods, participating in several clean-up initiatives, and aiding in the development of recycling programs in Nunavik.

The KEAC would like to take the opportunity to provide our comments in light of enhancing the measures for the treatment of residual materials and aid the KRG in the realization of the final version of the Management Plan.

The KEAC recognises that the realization and implementation of an effective recycling and composting program for the region will significantly reduce the annual accumulation of waste in landfills. To facilitate the collection of residual materials, one of the proposed pilot projects, aims at establishing a system of selective collection at the community level. The development of such a system is feasible however not easily achievable since the high cost of transportation, the necessity to re-organize collection methods, storage, the cost and maintenance of additional equipment, as well as the necessity of ensuring the participation of local residents are examples of certain obstacles that must be overcome for the proper realization of this pilot project.

On the other hand, the Management Plan proposes a series of potential solutions that could be used to overcome these obstacles. Some of which include: Cost reduction methods for shipping recyclables, the development and use of public and residential recycling bins, as well as the establishment of local storage facilities among others.

The implementation of a recycling and composting program in Nunavik will also reduce the large amounts of solid waste burned in community residual materials disposal sites. At present, burning is the main method of solid waste reduction practiced in the region. Burning solid waste also poses a serious risk to human health and the integrity of the natural environment. This is of increasing importance since landfills in all of Nunavik's 14 communities are perpetually expanding. In order to slow the expansion of municipal landfills, it is essential that steps are taken towards improving management practices for these sites. The initial priority should be to sort and consolidate their present contents with a view towards the proper treatment of waste made of recyclable materials as described in the Management Plan.

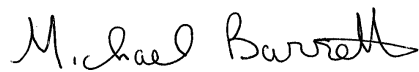
The handling, storage, and disposal of hazardous waste has been a priority issue of the KEAC for several years. At present, the Northern Villages handle the treatment and disposal of hazardous waste generated from primarily domestic activities. However the Management Plan broadens the scope and the scale to which hazardous waste is handled and disposed of. For instance, hazardous waste generated from unserviceable vehicles, appliances, and construction activities should be disposed of in designated disposal zones that comply with the safety criteria set forth in the "*The Regulation Respecting the Recovery and Reclamation of Products by Enterprises*" where possible.

Transportation measures are also considered in instances where hazardous waste must be treated at facilities in Southern Quebec. Furthermore, the treatment and sale of scrap metal from unserviceable vehicles, appliances, and construction waste could help cover a portion of the cost of the project.

Critically, the acquisition of the necessary financial resources is of the utmost importance for the proper realization and function of the pilot projects set forth in the Management Plan. Critically, the KEAC would like to emphasize that the Government of Quebec must ensure adequate funding resources to assure the efficient implementation of the Management Plan. Financial provisions should also include the hiring and training of the personnel required to realize and sustain the pilot projects.

To conclude, the KEAC believes that the *Draft Nunavik Residual Materials Management Plan*, when implemented, will improve the overall status of residual materials management in the region while enhancing public, governmental, and industrial participation as well as fostering an awareness of the importance of preserving the integrity of Nunavik's fragile and unique environment.

Sincerely,

A handwritten signature in black ink that reads "Michael Barrett". The signature is written in a cursive style with a large initial "M".

Michael Barrett
Chairperson-KEAC