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Comité Consultatif de l'environnement Kativik
Kativik Environmental Advisory Committee

**KEAC POSITION PAPER ON STRENGTHENING THE ENVIRONMENTAL
AND SOCIAL IMPACT ASSESSMENT
AND REVIEW PROCEDURE IN NUNAVIK**

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I – KEAC Mandate

The Kativik Environmental Advisory Committee (KEAC) was established pursuant to Section 23 of the *James Bay and Northern Québec Agreement* (JBNQA). The KEAC is a consultative body to responsible governments in matters relating to environmental and social protection in Nunavik. As such, it is the preferential and official forum for the governments of Canada and Québec, the Kativik Regional Government (KRG) and the Northern villages.

This position paper is based on paragraphs 23.5.24 to 23.5.27 of the JBNQA which stipulate that:

- The KEAC shall oversee the administration and management of the environmental and social protection regime through the free exchange of views, concerns and information;
- The KEAC shall, with adequate justification, make recommendations to responsible governments concerning legislation, regulations and other appropriate measures related to the environmental and social protection regime;
- The KEAC shall examine environmental and social legislation and regulations relating to the effects of development as well as existing land use regulations and procedures which might directly affect the rights of Native people, and may propose changes where appropriate.
- The KEAC shall examine and make recommendations respecting the environmental and social impact assessment and review mechanisms and procedures for the region.

All the decisions and recommendations of the KEAC are transmitted to the provincial and federal governments as well as to the local and regional governments concerned, for information purposes and appropriate action (paragraph 23.5.30).

This position paper describes the results of the KEAC's review of the environmental and social impact assessment and review procedure established under Section 23 of the JBNQA. Over the last few years, the KEAC has carried out consultations in addition to compiling and analyzing information regarding the implementation of the environmental and social protection procedure¹ and schedules 1 and 2 of Section 23 concerning projects subject to and exempt from the procedure.

Also for the purpose of improving the scope and understanding of the assessment mechanisms in effect North of the 55th parallel for project proponents and the general public, the KEAC also prepared in cooperation with regional stakeholders and has posted on its website (www.keac-ccek.ca) the *Environmental and Social Impact Assessment and Review Procedure Guide* for Nunavik.

¹ To consult the information collected, refer to: Robert COMPTOIS, *Revision of Schedules 1 and 2 of Chapter 23 of the JBNQA: Updates, Additions and Data Analyses for a Draft Amendment*, Phase 1, Report to the KEAC, July 3, 2003, p. 2; Robert COMPTOIS, *Révision des Annexes 1 et 2 du Chapitre 23 de la CBJNQ : mise à jour, compléments et analyses de données en vue d'un projet de modification*, Phase 1, additional work, KEAC, September 1, 2003.

II – Context

The JBNQA was signed in 1975. Section 23 of the JBNQA establishes an environmental and social impact assessment and review procedure. Schedules 1 and 2 of Section 23 identify respectively the categories of projects that are automatically subject to or exempt from the procedure. A screening process exists for projects that do not appear in either schedules 1 or 2. These projects are described as falling into a “grey zone” and require administrative agencies to decide whether they should be subject to or exempt from the assessment and review procedure. Regarding projects that fall under provincial jurisdiction, the Kativik Environmental Quality Commission (KEQC) is responsible for making this decision and transmitting it to the provincial administrator. Regarding projects that fall under federal jurisdiction, the Screening Committee is responsible for recommending a decision in this respect to the federal administrator.

The JBNQA provides for the periodic updating and modification of the schedules of Section 23 (paragraphs 23.3.12 and 23.3.13). The JBNQA also specifies that the provisions of Section 23 may be amended at any time by mutual consent of the interested parties (paragraph 23.7.10). The *Environment Quality Act* (EQA), which reproduces the provisions of Section 23 of the JBNQA, also provides for the revision of the schedules (section 153).

Over the years, the environmental and social impact assessment and review procedure has become outmoded. Justified criticism has been expressed concerning its implementation, underlining the need to streamline the procedure. The evolution of knowledge and technologies, not to mention the experience gained since 1975, should contribute to the revision and updating of the procedure. Overall, consultations with several stakeholders and interested individuals, plus the review carried out by the KEAC, demonstrate a number of reasons to proceed with the revision of the procedure established under Section 23 of the JBNQA and its schedules:

- Project subject/exemption criteria, as well as assessment and review criteria, are not always precise or applied consistently, among other reasons, due to the discretion left to the decision-making administrative agencies. As a result, some projects automatically subject to the procedure have not always been assessed and reviewed in the past, and it is unclear why the provisions of the JBNQA (paragraph 23.3.12) were not followed².
- The timeframe for the procedure and unpredictability regarding its application are a source of insecurity and are regularly criticized by project proponents and interested individuals³. By way of example, public infrastructure development projects have been undertaken in the past even before all the administrative authorizations were issued⁴. Yet,

² Robert COMPTOIS, *Revision of Schedules 1 and 2 of Chapter 23 of the JBNQA*, aforementioned, note 1, p. 29: Table 1, which is a study of the public register (Québec) concerning environment assessment in Nunavik, was compiled on September 9, 2000, based on the public register referred to in section 118.5 of the EQA, and identifies five outfitting projects that the KEQC exempted from the assessment and review procedure despite the fact that this category of project is automatically subject to the procedure under Schedule 1.

³ Robert COMPTOIS, *Revision of Schedules 1 and 2 of Chapter 23 of the JBNQA*, aforementioned, note 1, p. 14–20.

⁴ *Id.*, p. 20 and 29.

this category of project is not exempt, pursuant to Schedule 2, from the procedure established under Section 23 of the JBNQA.

- The federal and provincial assessment and review procedures are very different, as established under the JBNQA and the *Canadian Environmental Assessment Act* (CEAA)⁵. The differences increase the work for project proponents and make it more difficult for the general public to understand the procedures and to participate in them.
- There are too many “grey zone” projects, which is to say projects not appearing in either schedules 1 or 2 that require administrative agencies to decide whether or not they should be subject to or exempt from the procedure. Categories of projects should be added to the schedules in order to reduce the unpredictability of the procedure and increase transparency.
- The criteria applied to “grey zone” projects are not known and they are at the discretion of the administrative agencies, making any judicial review of these decisions difficult.
- To compensate for their rigid natures, the parties to the JBNQA agreed in 1975 to review the content of the schedules established under Section 23 of the JBNQA every five years. However, despite the legal provisions regarding the periodic revision of the procedure, the parties have made practically no change to the procedure and its schedules since 1975⁶.

Regarding environmental assessment, access to information and public participation are internationally recognized rights in a growing number of countries. The limited legal guarantees offered to Inuit and the region’s residents in these respects are a weakness in Nunavik’s current assessment and review procedure⁷. For example, the decision to hold public hearings or not and the conditions governing participation are at the discretion of the

⁵ Recent court decisions are proof of the disputes that have arisen with the application of the CEAA in territories governed by the JBNQA: *Moses vs. Canada*, Superior Court, District of Montreal, Judge Nicole B nard, March 30, 2006, amended April 27, 2006, overruled on appeal *Moses vs. Canada*, Court of Appeal, District of Montreal, 500-09-016646-069, April 24, 2008. Refer to the *Opinion and Recommendations of the KEAC regarding Double Environmental Assessment of Nunavik Projects by the Federal Government submitted to the Federal Administrator*, March 21, 2002.

⁶ Marie-Jos e VERREAULT, aforementioned, note 4, p. 243 (note 99 and corresponding text) and 246–247. In 1978, with the adoption of Chapter II of the EQA, precise thresholds were introduced to schedules A and B.

⁷ JBNQA, paragraph 23.2.2 c): “A special status and involvement for the Native people and the other inhabitants of the Region over and above that provided for in procedures involving the general public through consultation or representative mechanisms wherever such is necessary to protect or give effect to the rights and guarantees in favour of the Native people established by and in accordance with the Agreement”.

JBNQA, paragraph 23.3.27: Interested persons, groups or communities may submit written representations to the EQC with respect to any development and the EQC, at its discretion, may invite interested persons, groups or communities to make representations to the EQC with respect to any development.”

JBNQA, paragraph 23.4.17: “The Native people and the communities, through the Regional Government may make written representations to the proponent respecting the proposed development and may submit written representations to the Review Panel.”

administrative agencies involved⁸. Section 23 of the JBNQA contains no provisions for the participation of Inuit and the region's residents nor does it provide guidelines for administrative decisions concerning this participation to ensure its outcome. In short, Section 23 does not guarantee access to information regarding the environment, development projects, and decisions made by the administrative agencies involved, nor regarding the participation of Inuit and the region's residents in the assessment and review procedure⁹. Section 23 moreover does not contain any obligation concerning the grounds for decisions. As well:

- The current information and public consultation processes lack transparency.
- Documents prepared by project proponents are not readily accessible to Inuit or to those interested in development projects in Nunavik. No website displays project information. In addition, the opinions of specialists from the various government departments and agencies are not known to the general public.
- Technical information can not be easily understood by the general public due to the absence of interpretive summary versions.
- Information about information sessions and public consultations (dates, places, participation means, etc.) are not readily accessible to the general public.
- The timeframe between the availability of complete documentation on the development projects and the start of consultations varies and is sometimes too short to allow the full participation of Inuit in the consultation process.
- The decision-making mechanism and criteria regarding the holding of information sessions and public consultations is not known to the general public.

Further to this review, the KEAC believes that all these problems combined jeopardize the effectiveness of the assessment and review procedure established under Section 23 of the JBNQA and require the parties to rapidly ensure that it is updated. The territory situated north of the 55th parallel is a unique and fragile ecosystem that is being increasingly affected by the impacts of climate change and pressure created by development projects. It is therefore important to effect the necessary updates to ensure that the environmental and social impact assessment and review procedure for Nunavik takes advantage of all the experience gained so far, that it can be

⁸ Marie-Josée VERREAULT, "Les régimes juridiques d'évaluation environnementale applicables au Nunavik, Première partie : le régime québécois", *Les Cahiers de Droit*, Vol. 42, No. 2, June 2001, p. 270.

⁹ *Id.*, p. 271: "If it were not for sections 118.5 and 213 of the EQA, no rule of law would govern access to information and public participation under the regime [...] applicable in Nunavik [translation]". Section 213 of the EQA specifies that the regulations generally applicable to the *Bureau d'audiences publiques sur l'environnement* [environmental public hearings board] made under paragraphs *c* and *d* of section 31.9 apply in Nunavik. In practice, Division IV Public Information and Consultation of the *Regulation respecting the Environmental Impact Assessment and Review* and the *Rules of Procedure relating to the Conduct of Public Hearings* do not seem to have ever been applied in Nunavik.

implemented efficiently and transparently, and that it continues to be an asset to the residents of Nunavik.

At the time of the signing of the JBNQA, the assessment and review procedure established under Section 23 was highly innovative and forward-looking. Having remained practically unchanged since 1975, Nunavik's assessment and review procedure must be revised and updated in accordance with current and internationally recognized environmental assessment practices. Although practices have improved in recent years, the signatories of the JBNQA have an obligation under the JBNQA and the EQA to carry out such a revision in order to comply with the commitments contained in the JBNQA and formally improve the assessment procedure and the participation rights of Inuit and the general public.

III - Recommendations

Section 23 of the JBNQA provides for the periodic revision of schedules 1 and 2 (paragraphs 23.3.12 and 23.3.13). The EQA, which reproduces these provisions, also provides for the revision of the schedules (section 153). Although this review mechanism is intended only for projects under provincial jurisdiction, the KEAC believes that the grounds for revising the schedules apply equally to projects under federal jurisdiction. The KEAC would furthermore like to stress that the three previous attempts to revise schedules 1 and 2 were each made by the KEAC, the KEQC and the Québec-government department responsible for the environment in Nunavik. Notwithstanding, not one of these revision attempts was completed by the signatories of the JBNQA¹⁰.

Recommendation 1: Revise schedules 1 and 2

The periodic revision of schedules 1 and 2 is provided for under the JBNQA. This mechanism must be initiated rapidly by the parties to the JBNQA in order to update the contents of schedules 1 and 2 and improve the effectiveness of the assessment and review procedure established under Section 23 of the JBNQA.

The KEAC believes that it has become urgent to complete the revision of schedules 1 and 2 and the related provisions of Section 23 of the JBNQA, if the effectiveness of the assessment and review procedure is to be maintained. Otherwise, the procedure will become outmoded. The spirit of the JBNQA must guide this revision process:

- All the guiding principles of Section 23 must remain the foundation of the revision of schedules 1 and 2 (paragraph 23.2.4).

¹⁰ For the list of these attempts, refer to: Robert COMPTOIS, *Revision of Schedules 1 and 2 of Chapter 23 of the JBNQA*, aforementioned, note 1, p. 21–28. The KEQC attempted to carry out a revision in 1982, the KEAC in 1994, and the *ministère de l'Environnement et de la Faune* [environment and wildlife, MEF] in 1996.

- The current system with its list of development projects automatically subject to (Schedule 1) and another list of development projects automatically exempt from (Schedule 2) the environmental and social impact assessment and review procedure must be conserved. It is also appropriate to conserve the current screening mechanism for development projects described as “grey zone”, which is to say that do not fall into either list.
- It is however appropriate to modify the contents of schedules 1 and 2 to specify thresholds, to modernize the contents and to reduce the number of “grey zone” development projects, based on the experience gained over the years and technological evolution of both means and the development projects. The screening experience gained will make it possible to include and exclude development projects that have systematically been subject to or exempt from the assessment and review procedure. Refer to the appendix to this document. It is also appropriate to stipulate the rules or criteria applicable to administrative decisions to subject or exempt “grey zone” projects.
- The legal framework provided by other laws and regulations that is applicable to development projects in Nunavik must not prevent or adversely affect the implementation of the assessment and review procedure which offers specific legal guarantees to Native people and the region’s residents.
- The parties must pay special attention to public infrastructure development projects to be carried out by the Northern villages in their territories in order to ensure that they are implemented in a timely manner¹¹.
- Special concern for the fragile environment of the North as well as the needs and expectations of the Inuit communities must take precedence over “budget considerations” and the desire to standardize the assessment and review procedures established under Section 23 of the JBNQA with procedures in effect elsewhere in Québec and Canada.

Currently, schedules 1 and 2 of Section 23 of the JBNQA apply to development projects submitted to both the federal and provincial procedures. The KEAC believes that a tripartite (provincial–federal–Inuit) approach should be favoured regarding the revision of the schedules and the rules governing how decisions are made to subject or exempt projects to or from the assessment and review procedure. Regardless, without such an agreement, nothing prevents the Inuit from finalizing separate arrangements with the governments of Québec and Canada. This hypothesis is in compliance with Section 23 (paragraphs 23.3.12, 23.3.13 and 23.7.10). It should also be recalled that the Québec government and the Makivik Corporation may, by simple regulation, amend the schedules of the JBNQA¹².

¹¹ Robert COMPTOIS, *Revision of Schedules 1 and 2 of Chapter 23 of the JBNQA*, aforementioned, note 1, p. 20.

¹² EQA, R.S.Q., c. Q-2, section 205: “The Government may, by regulation: [...] (d) modify, pursuant to a recommendation of Makivik Corporation to that effect, Schedules A and B and, pursuant to a similar recommendation, automatically subject to, or exempt from, the assessment and review procedure contemplated in Division III of this chapter, other projects”.

In this respect, the KEAC believes that the previous attempts to revise schedules 1 and 2 represent a good starting point for the parties, in particular the document produced by the *ministère de l'Environnement* [environment] (MEF, 1996; KEAC, 1997) during the last revision attempt. As well, the experience gained with “grey zone” projects may be used to reduce these cases by integrating into schedules 1 and 2 the development projects that have generally been subjected to or exempted from the assessment and review procedure. Finally, the KEAC position paper concerning current and future transportation infrastructure development emphasizes the need to clarify that road, wharf and airport development projects in Nunavik should be subject to the assessment and review procedure.

Recommendation 2: Strengthen the assessment and review procedure

The KEAC recommends that the parties to the JBNQA revise the environmental and social impact assessment and review procedure established under Section 23 of the JBNQA in order to strengthen the right of Inuit and the general public to participate in the decision-making process for development projects in Nunavik, as well as to make the procedure more predictable and transparent.

The goal of this revision should be to improve the effectiveness of the assessment and review procedure established under Section 23 of the JBNQA, as well as public understanding of the procedure. Rights regarding access to information, public participation in the decision-making process and access to justice in environmental matters represent the three components of public participation recognized internationally as the procedural avenues for every individual's right to live in a healthy environment. Public participation is also a cardinal principle of sustainable development (*Convention on Biological Diversity*, Principle 10; *Sustainable Development Act*, section 6; Québec's *Charter of Human Rights and Freedoms*, section 46.1).

While many related international conventions have been adopted, the *Convention on Access to Information, Public Participation in Decision Making and Access to Justice in Environmental Matters* (Aarhus, 1999) that applies in more than 30 European countries needs to be mentioned in particular. The principles and provisions contained in this agreement are the current standard for developed countries and should guide efforts to strengthen the environmental and social impact assessment and review procedure in Nunavik. The importance of providing legal guarantees for these rights (access to information, public participation and access to justice) for Inuit and the region's residents, as well as implementing rational and systematic consultation procedures, must not be underestimated. For example, it would be appropriate to:

- Strengthen access to information on development projects automatically subject to the assessment and review procedure and for “grey zone” projects which require decisions as to whether they should be subject to or exempt from the procedure.
- Make accessible on the Internet and at consultation centres in Nunavik all the documents for development projects subject to the assessment and review procedure (Schedule 1 and “grey zone”) beginning with the initial stages of each project. The following documents

should be made available to the general public: preliminary information, the project description and environmental and social impact study prepared by the project proponent, all the additions and modifications to the project, maps and plans, notices issued by provincial and federal government departments and agencies, public position papers, timetables, etc.

- Specify the locations where the information is available and the timetables for informing and consulting the general public.
- Ensure that the general public has sufficient time to consult development project documentation and to request public consultations.
- Specify and make known public-hearing request mechanisms, as well as the assessment criteria applied to these requests, the language of communication, the announcement of these hearings, participation costs, the grounds for decisions, etc.

In this spirit, the proposed amendments to the assessment and review procedure established under Section 23 of the JBNQA should be submitted to public consultations and approved by the parties to the JBNQA.

Recommendation 3: Implement strategic environmental assessments

The KEAC recommends that the parties to the JBNQA examine the possibility of undertaking the strategic environmental assessment of plans, programs and policies that apply in Nunavik.

Environmental assessment has made significant progress since the adoption of the JBNQA. In this respect, the strategic assessment of plans, programs and policies that might have an impact on a region's territory is now a recognized assessment mechanism employed by a growing number of countries. Strategic environmental assessment makes it possible to study beforehand not only the impacts of an isolated development project but also of the cumulative impact of a series of projects regardless of whether they are subject to or exempt from an assessment and review procedure, like the one established under Section 23 of the JBNQA.

Take for example *The 1999 Cabinet Directive on the Environmental Assessment of Policy, Plan and Program Proposals* (Canada). The public land use plan of the *ministère des Ressources naturelles et de la Faune* [natural resources and wildlife] could be subject to such an assessment and permit Nunavik's existing assessment and review procedure to once again become an asset to the region's residents.

More generally, strategic environmental assessment should be applied to plans, programs and policies concerning, among others, fishing, logging, energy production, industrial activities, mining, transportation, regional development, waste management, water management, tourism, as

well as land use and planning in Nunavik¹³. Strategic environmental assessment should make it possible to evaluate the environmental and social impacts of new plans, programs and policies.

IV - Conclusion

Section 23 of the JBNQA and its schedules 1 and 2 have remained practically unchanged since 1975, despite the revision mechanisms provided for in the JBNQA. Over the years, justified criticism has been expressed concerning the implementation of the assessment and review procedure, underlining the need to make it more streamlined. The evolution of technologies, not to mention the experience gained since 1975, should contribute to the revision and updating of the procedure. Access to information and public participation in environmental decision-making matters are now internationally recognized rights, and it is time to take advantage of this momentum to re-innovate the JBNQA.

Among stakeholders, the underlying goals of all previous attempts to revise the assessment and review procedure have been to make it more predictable, responsive and efficient, in order to shed its decade-long reputation as an irritant. The more effective implementation of the procedure must therefore be a priority objective of all involved organizations. These goals are all the more important because Nunavik possesses a unique and fragile ecosystem that is being increasingly affected by the impacts of climate change and pressure created by natural resource development projects.

The KEAC believes that, in addition to the revision of the schedules and the public participation process under Section 23 of the JBNQA, there are other actions that may be undertaken immediately to make the procedure more effective. Greater transparency should be a rule of thumb for the activities of the administrative agencies responsible for decision making. The criteria applicable to decisions to subject or exempt development projects to or from the procedure and records of the decisions of the administrative agencies must be made public. As well, discretionary decisions to exempt development projects automatically subject to the procedure must be avoided. The public register provided for in section 118.5 of the EQA must be kept up to date and include all the relevant data on planned and completed development projects in Nunavik.

In the opinion of the KEAC, it is important to proceed with the necessary changes so that the assessment and review procedure can take full advantage of the experience gained over the years, that it can be implemented efficiently and transparently, and that it continues to serve the region's residents. Finally, the KEAC is prepared to support this streamlining process and furthermore believes that the previous revision attempts are an excellent starting point.

¹³ Examples drawn from: UNITED NATIONS ECONOMIC COMMISSION FOR EUROPE, *Protocol on Strategic Environmental Assessment to the Convention on Environmental Impact Assessment in a Transboundary Context*, May 21, 2003, Doc. ECE/MP.EIA/2003/2, [online], [<http://www.unece.org/env/eia/documents/legaltexts/protocolenglish.pdf>] (November 10, 2008).

Appendix

Table 1

ENVIRONMENTAL ASSESSMENT IN NUNAVIK — STUDY OF THE PUBLIC REGISTRY (QUÉBEC)¹⁴
 Development projects according to the activity category (1) and their processing (2) as of April 10, 2003
 under the environmental assessment regime in application on the territory subject to the JBNQA (north of the 55th parallel)
 Sources: CDEUL, 2003; Verreault, 2001a : 279; KEAC, 2003.

Processing of projects:	A	B	C	D	E	F	G	H	I	J	K	L	Total
	(a.s.)	(a.s.)	(a.s.)	(a.s.)	(a.s.)	(a.e.)	(g.a.)	(g.a.)	(g.a.)	(g.a.)			
Activity category:													
Airports	3	2	12	1	-	-	-	1	-	-	2	-	21
Borrow pits	-	1	-	-	-	-	-	6	-	-	-	-	7
Exploratory mining camps	2	-	-	-	-	-	-	-	-	-	-	-	2
Power plants for energy production	2	1	1	-	-	-	-	1	-	-	-	-	5
Waste	2	2	17	-	-	-	-	6	-	-	1	-	28
Dikes, piers, breakwaters and sills	-	8	2	-	-	-	-	1	-	2	-	-	13
Dredging and digging	-	-	-	-	-	-	-	2	-	-	-	-	2
Drinking water and wastewater	4	3	4	-	-	-	-	15	-	-	2	-	28
Aquatic ecosystems	1	-	-	-	-	-	-	-	-	-	-	-	1
Furbearer - breeding	2	-	-	-	-	-	-	-	-	-	-	-	2
Exploration and mining	2	-	1	-	-	-	3	4	1	-	3	1	15
Meat product processing industries	-	1	-	-	-	-	-	1	-	-	-	-	2
Residential subdivisions	1	1	1	-	-	-	-	1	-	-	1	-	5
Petroleum	2	-	-	-	-	1	-	16	1	-	3	-	23
Fish plants	-	-	-	-	-	-	-	1	-	-	-	-	1
Ports and wharves	2	-	4	-	-	-	-	2	-	-	-	-	8
Outfitting operations	1	2	-	-	5	1	-	16	-	-	-	-	25
Natural sites	-	1	1	-	-	-	-	-	-	-	-	-	2
Medicinal plants	-	-	-	-	-	-	-	1	-	-	-	-	1
Total	24	22	43	1	5	2	3	74	2	2	12	1	191

Notes:

(1) This table was drawn up on the basis of data that were up-to-date as of April 10, 2003. They were obtained from the Québec ministère de l'Environnement, mostly under subsections (a) and (b) of Section 118.5 of the E.Q.A. and the others by way of a request for access to information.

(2) **Processing of projects:** A : Only listed.

B : For which only the preliminary information was submitted.

C : Automatically subject (a.s.) and authorized by the KEQC.

D : Automatically subject (a.s.) and authorized a posteriori by the KEQC.

E : Automatically subject (a.s.) and exempted by the KEQC.

F : Automatically exempt (a.e.).

G : Grey area (g.a.) subject and authorized by the KEQC.

H : Grey area (g.a.) not subject by the KEQC.

I : Grey area (g.a.) not subject a posteriori.

J : Whose impact study was carried out a posteriori.

K : Modifications to the a.c. or certificates of exemption authorized by the KEQC.

L : Extension of the authorization certificates

¹⁴ Robert COMTOIS, *Revision of Schedules 1 and 2 of Chapter 23 of the JBNQA*, aforementioned, note 1, p. 30.

