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Comité consultatif de l'environnement Kativik  
Kativik Environmental Advisory Committee

July 28, 2021

Marie-Andrée Vézina  
Industrial Waste and Contaminated Site Reduction Program Branch  
Ministère de l'Environnement et de la Lutte contre les changements climatiques  
675 René-Lévesque Blvd. East, 9th Floor, Box 71  
Quebec City QC G1R 5V7

**SUBJECT: 2022–2026 action plan under the *Soil Protection and Contaminated Sites Rehabilitation Policy***

Dear Madam:

The Kativik Environmental Advisory Committee (KEAC) was created pursuant to Section 23 of the *James Bay and Northern Québec Agreement*. It 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 Government of Canada, the Gouvernement du Québec, the Kativik Regional Government (KRG), and the northern villages. When developing and updating laws and regulations applicable north of the 55th parallel, the Ministère de l'Environnement et de la Lutte contre les changements climatiques (the environment and the fight against climate change, MELCC) should therefore include the KEAC in its consultations.

The KEAC became aware through a third party of the MELCC process to develop a new action plan under the *Soil Protection and Contaminated Sites Rehabilitation Policy*. In particular, the KEAC would like to express its support for the letter transmitted by the KRG to the MELCC in June 2021. The KRG letter accurately describes the specific challenges faced in Nunavik, which relies on fuel oil and diesel for heating and power. The transportation and storage of these fuels are often inadequate, leading to many spills. For its part, contaminated soil management is complex and expensive. The remoteness of the 14 northern villages and the absence of road infrastructure in particular mean that costly and seasonal maritime shipping is unavoidable.

Spill prevention and contaminated soil management represent unique challenges in Nunavik that require unique solutions. For this reason, the KEAC urges the MELCC to include Nunavik-adapted measures in its 2022–2026 action plan. The KRG letter in fact identifies several tentative solutions that merit serious consideration:

KEAC Secretariat

P.O. Box 930, Kuujuaq QC J0M 1C0  
Tel.: 819-964-2961, ext. 2287  
Email: bpatenaude@krg.ca

- prevention and awareness campaigns for regional organizations that own buildings;
- prevention, risk identification and emergency response training;
- new and updated maintenance guides;
- tighter follow-up on the part of the Bureau d'urgence en environnement (environmental emergency office) with parties responsible for spills;
- adapted building standards in northern regions for fuel oil tanks;
- soil treatment centres (private or municipal) in several communities;
- financial assistance program for decontamination work;
- research and development adapted to northern realities;
- electric heating for certain crucial infrastructure (such as drinking water plants).

The KEAC plans to monitor preparation of the new action plan and its implementation in Nunavik. It would therefore like to be kept informed of all new related developments.

Sincerely,  
[signature]

Tunu Napartuk  
Chairperson

c.c. Véronique Gilbert, KRG