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Comité consultatif de l'environnement Kativik
Kativik Environmental Advisory Committee

June 10, 2022

Maude Durand
Interim Director
Legislative and Regulatory Strategy Office
Ministère de l'Environnement et de la Lutte contre les changements climatiques
900 René-Lévesque Blvd. E., Suite 800
Quebec City QC G1R 2B5

Subject: Consultation on the draft omnibus regulation to amend various regulations, mainly concerning the authorization regime

Dear Madam:

On behalf of the members of the Kativik Environmental Advisory Committee (KEAC), I would like to thank you and your colleagues for contacting our organization regarding the draft omnibus regulation to amend various regulations, mainly concerning the authorization regime. The KEAC greatly appreciates the advance information on the planned amendments, including the presentation delivered by Ian Courtemanche at the KEAC's 171st meeting and the proactive notice signalling the start of the public consultation.

You will find enclosed hereto a copy of the MELCC-template with KEAC feedback added regarding a few points of interest relating to the regulations affected by the draft omnibus regulation.

The KEAC would also like to share with you its concerns regarding the use of declarations of compliance in the north, mainly with respect to monitoring. The resources assigned to environmental monitoring in the region are already insufficient to ensure compliance with existing laws and regulations. In this context, the KEAC worries that the chronic lack of resources will further compromise the proper monitoring of work covered under any new declarations of compliance, particularly in remote areas.

Proposed legislative amendment

The KEAC would like to take advantage of this opportunity to propose a regulatory amendment aimed at improving the environmental assessment register. Under Title I of the *Environment Quality Act*, sections 23 and 23.1 require persons or municipalities applying to the Minister for authorizations to provide certain information and documents, which then become public unless the Minister determines that they must remain confidential. Similar provisions should be added to Title II of the *Environment Quality Act* in order to ensure that transparency and accessibility to documents is the same in the areas covered by Title II. In those areas, the purpose and procedure for publishing documents, which currently rely on the goodwill of project proponents, do not ensure that a complete and adequate portrait of information is available on either current or planned projects in Nunavik. When next amendments are adopted through an omnibus regulation or directly to the *Environment Quality Act*, the KEAC would therefore like to propose that this issue be considered and that provisions similar to those of section 23 and 23.1 be integrated under Title II.



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The KEAC would like to thank you for your collaboration on this matter and hereby expresses its desire to be kept informed of the development, application and, when applicable, updating of laws and regulations applying in Nunavik.

Sincerely,

Alexandre Guy-Côté
Chairperson