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Comité consultatif de l'environnement Kativik
Kativik Environmental Advisory Committee

September 6, 2024

Viviane Juneau
Team Leader, Reclamation and Disposal Expertise Branch
Ministère de l'Environnement, de la
Lutte contre les changements climatiques, de la Faune et des Parcs
Marie-Guyart building, 9th floor, Box 71
675, René-Lévesque Boulevard East
Québec, QC
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Subject: Comments on the draft framework for the reclamation of fertilizing residual materials

Dear Ms. Juneau,

The Kativik Environmental Advisory Committee (KEAC) is the official forum for responsible governments regarding the development of laws, regulations and policies concerning environmental and social protection in the territory governed by the James Bay and Northern Quebec Agreement (JBNQA) and in the region north of the 55th parallel.

The Kativik Regional Government (KRG) is a non-ethnic public organization created in 1978 under the JBNQA. The organization has jurisdiction within the vast area of Nunavik in sectors such as municipal affairs, transportation, the environment, renewable resources and land use planning. In particular, the KRG has expertise in waste management in Nunavik, and supports the 14 northern villages in these projects.

The KEAC and KRG would like to extend our gratitude for the particular attention your team extended to Nunavik representatives to better understand the regional realities of waste management during our July 12 and August 30, 2024, meetings. Unfortunately, we were not officially informed when the draft framework was made available for public consultation, from July 24 to September 7, 2024, and therefore had little time to fully evaluate the documents. As such, you will find below summarized comments of our two organizations concerning the draft framework on the valorization of fertilizing residual materials. Based on the established roles of the KEAC and KRG in the JBNQA, we ask the Ministère de l'Environnement, de la Lutte contre les changements climatiques, de la Faune et des Parcs (MELCCFP) to formally invite our organizations to future consultation activities.

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Context

Waste management in Nunavik presents challenges specific to northern environments. Until recently, almost all residual materials were sent to northern landfill sites (NLS), where combustible materials are burned and then compacted, and other materials are set aside¹. Since 2015, the KRG has had a residual materials management plan (RMMP). The RMMP currently in force (2021-2027) includes an action plan with twenty-one measures from which residual materials management projects stem. Several waste management projects are currently underway in Nunavik, with the aim of diverting waste materials from landfill, particularly in the area of organic waste management. A composting project began in Inukjuak at the end of 2023, and two projects are underway in Kuujuaq and Kangiqsualujuaq.

The draft framework for the valorization of fertilizing residual materials provides for regulatory relief for certain composting facilities, as well as for certain uses of compost. Based on discussions held with your team, we feel that these moderations do not fully address the issues faced in Nunavik. At present, composting projects in Nunavik are aimed at using compost as a cover material for NLSs, thus meeting the dual need of reducing the volume of residual materials entering these sites and finding local sources of loose materials for NLS management. This specific use is not provided for in the proposed amendments to the REAFIE.

To allow for composting of animal carcasses, Nunavik compost projects require ministerial authorization. Furthermore, compost from these projects will have to undergo compost quality controls by an accredited laboratory twice a year, including Salmonella analysis and maturity criteria as defined in CAN\BNQ 0413-200, in the same way as compost intended for domestic use. In the same vein, generators, such as Northern Villages, are now required to include agronomic data on fertilizing residual materials in their description sheets. Performing these sampling/tests in Nunavik presents several logistical challenges as there is no accredited laboratory in the territory. The tests must be flown to Montreal, while ensuring that the necessary timeframes are met. Such handling requires planning that is difficult to integrate into employees' daily tasks, in addition to representing additional expenses for northern villages.

Recommendations

Considering that:

- The draft framework on the valorization of fertilizing residual materials already provides that several uses of compost are exempt from obtaining ministerial authorization;
- Waste-to-fertilizer projects are crucial to the sustainable and responsible management of LEMN,
- The intended short-term use of compost from fertilizer waste reclamation projects in Nunavik is exclusively as capping material in NLS, and therefore poses virtually no health risk to the public;
- Any changes in the use of compost should comply with current regulations;

¹ Nunavik Residual Materials Management Plan: [nunavik-pgmr-2021-2027.pdf \(gouv.qc.ca\)](#)

The KEAC and KRG recommend that:

- The use of compost as a covering material in the LEMN should not be considered a waste reclamation activity and should therefore be exempt from quality testing. Alternatively, this use should at least be included in the list of activities exempted from ministerial authorization by the amendments to the REAFIE;
- The description sheet for fertilizing residual materials to be used exclusively for covering materials in NLS be simplified by excluding agronomically relevant data;
- The frequency and scope of quality tests be reduced for compost whose sole use will be as a cover material for NLS.

The KEAC and the KRG thanks the MELCCFP in advance for receiving and considering the above recommendations. Our teams will continue to follow with interest the progress of the framework project on the valorization of fertilizing residual materials and remain available for any further consultations.

Best regards,



André-Anne Gagnon
Chairperson, KEAC



Véronique Gilbert
Assistant Director, Environment & Lands, KRG