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 Comité consultatif de l'environnement Kativik  
 Kativik Environmental Advisory Committee

December 17, 2025

Frédéric Guay  
 Provincial Administrator- Section 23 of the JBNQA  
 Deputy minister- Ministère du Développement durable,  
 de l'Environnement et de la Lutte contre les  
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**Subject: Follow-up on the BAPE's recommendations regarding open burning in northern landfill sites**

Dear Mr. Guay and Dr. Quach-Thanh,

In December 2020, the Minister of the Environment and the Fight Against Climate Change (MELCC) mandated the Bureau d'audiences publiques sur l'environnement (BAPE) to investigate the status and management of final waste in Quebec. The purpose of the inquiry was to assess the disposal of final waste throughout the province and to estimate the waste disposal capacity for the 20 years following the launch of the inquiry.

This assessment included the territories covered by Sections 22 and 23 of the James Bay and Northern Quebec Agreement (JBNQA) and Section 14 of the Northeastern Quebec Agreement (NEQA). As such, the BAPE worked jointly with the advisory committees provided for in the JBNQA, including the Kativik Environmental Advisory Committee (KEAC), who is the preferred and official forum for the governments responsible for Nunavik and has a mandate to study and supervise the application and administration of the environmental and social protection regime set out in the JBNQA. The KEAC therefore agreed to create a

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special commission and to co-chair the Nunavik consultations jointly with the BAPE commission, which took place on June 9, 2021. The KEAC and BAPE commissions continued to collaborate in drafting Chapter 11 of the BAPE report entitled “Waste management in treaty territories”. The [final report](#) was released in January 2022.

In Chapter 11, the KEAC and BAPE commissions agreed on nine recommendations for Nunavik, including the financing of waste management projects, the implementation of selective collection, scrap metal recycling, and deposit-refund programs adapted to the region, and clarification of the governance of waste management in the region. The commission also examined the issue of open burning of waste in Nunavik communities, a practice that is currently mandatory once a week in Northern Landfill Sites under article 99 of the *Regulation respecting the landfilling and incineration of residual materials*. On this subject, section 11.2.4 of the report concludes with the following recommendations:

- The BAPE and KEAC commissions consider it imperative that the MELCCFP characterize the environmental contamination caused by open burning of waste in Nunavik.
- The BAPE and KEAC commissions consider it imperative that the Ministry of Health and Social Services (MHSS) assess the population’s exposure to contaminants emitted by open burning of waste in Nunavik. To this end, it could use as a model the residents living closest to a landfill site.
- Pending the results of studies characterizing environmental contamination and the population’s exposure to contaminants emitted during the burning of waste in Nunavik, the BAPE and KEAC commissions consider it essential that health criteria be defined by the MHSS and considered by the MELCCFP when choosing the location of new landfills.

Similar recommendations were made for the community of Kawawachikamach in section 11.1.3 of the report. In the latter case, the creation of a joint working group to discuss common issues related to open burning in northern or isolated areas was recommended. Several sections of the BAPE report address the issue of open burning and its effects on the environment (section 5.3), physical health (6.1.3), and psychosocial consequences (6.2.3).

The KEAC has recently met with various partners to follow up on the above recommendations specific to open burning. According to information obtained during these meetings, none of these recommendations have been implemented and that the multisectoral committee that would be mandated to address the issues of open burning in northern landfills was never created. This issue remains a great concern for Nunavik communities and as such, the KEAC reiterates the need to ensure adequate follow-up on recommendations from the BAPE report concerning health and environmental issues related to open burning of waste in the region. Therefore, the KEAC recommends the creation of a joint working group to address the population’s exposure to contaminants emitted by open burning, assist with the characterization of health and environmental impacts of this practice and to discuss common issues related to open burning in northern

regions in a coordinated manner. The Committee believes that this would allow for better monitoring of the recommendations made on the impacts of open burning in section 11.2 of the BAPE report.

The KEAC would like to point out that, as described in detail in “Report 364: The Status and Management of Final Waste,” open burning of waste in Nunavik landfills poses a serious threat to the environment and public health and that, as a result, it is imperative that the responsible authorities take all measures within their power to respond to the recommendations made in the investigation report.

Best regards,



Michael Barrett,  
Chairperson, KEAC

c.c:

Marie-Jo Ouimet, Public Health Director, Nunavik Regional Board of Health and Social Services