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Comité consultatif de l'environnement Kativik
Kativik Environmental Advisory Committee

Kuujuaq, August 10, 2026

Environmental Justice and Racism Team
Environment and Climate Change Canada
125 Zaida Eddy Private
Ottawa, ON, K1R 0E3

SUBJECT: KEAC feedback regarding Canada's Draft National Strategy Respecting Environmental Racism and Environmental Justice 2026-2031

The Kativik Environmental Advisory Committee (KEAC) was created pursuant to Section 23 of the James Bay and Northern Québec Agreement (JBNQA) and **is a consultative body to responsible governments in matters relating to environmental and social protection in Nunavik**. As such, the KEAC should have been directly consulted by Environment and Climate Change Canada (ECCC) regarding the Draft National Strategy Respecting Environmental Racism and Environmental Justice 2026-2031 ("Strategy"), both during the initial stages of engagement and during this current public comment period beginning June 26, 2026. Instead, the Committee was only recently informed of the Strategy through one of our regional partners and was given very little time to adequately reflect on the provided document.

The federal government's approach to advancing environmental justice and to assess, prevent and address environmental racism is relevant to Nunavik, since the region is often excluded from federal support programs and funding for environmental initiatives based on politically established boundaries. Additionally, Nunavik communities and organizations continue to seek to establish transparent collaboration with both the federal and provincial governments regarding retroactive environmental damage that affect the Territory. Below you will find general and specific comments on the Strategy.

General Comments

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The Strategy puts a specific emphasis on First Nations but never once mentions Inuit. The KEAC wish to remind the Canadian government that the Inuit are not considered as a First Nation people and are a distinct population not governed by the Indian Act. Their rights and self-governance are established through modern land claim agreements such as the JBNQA. As such the KEAC recommends this error be corrected and that First Nation and Inuit be mentioned in the document.

The Strategy acknowledges that certain communities, including First Nations and Inuit, are disproportionately affected by environmental risks and that decision-making processes must be more equitable and inclusive. However, the proposed measures in the Strategy are phrased in general terms and are presented only as potential priority actions with a lack of an implementation timeline and solid commitment. The current text places a disproportionate emphasis on describing methodology, the limitations of available data, and the uncertainties surrounding the analyses, at the expense of concrete implementation measures. The KEAC recommends that the Strategy be improved to incorporate clear commitments, implementation measures, timelines, monitoring indicators, and accountability mechanisms, such that it serves as a genuine framework for well-defined concrete action rather than merely a guidance document. These improvements must involve meaningful discussions with First Nation groups including the Naskapi as well as the Inuit.

The KEAC notes that some of the federal government's current initiatives are already inconsistent with the measures proposed in the Strategy. For example, the KEAC is concerned that efforts to reduce the time required for impact assessments undermine the environmental assessment mechanisms and procedural safeguards essential to protecting the rights of Inuit and Naskapis. As such, the KEAC recommends greater coherence between the Strategy and other federal initiatives related to the rights of the Inuit and Naskapi as established in the JBNQA's environmental and social protection regime defined under Section 23. This regime aims to minimize the negative impacts of development projects on the environment and the population, to enable the participation of Indigenous peoples in environmental and social protection, and to provide protection for their rights, societies, communities, economies and wildlife resources.

Strategy Development

The KEAC understands that the creation of the Strategy was guided by input from a variety of sources with a specific emphasis on Indigenous Peoples. However, the KEAC was not consulted during these activities nor were other Nunavik Inuit organizations or communities. The Committee views this as an oversight as the region is characterized by a large number of sites that pose environmental risk in the region (ie. Mid-Canada Line radar sites, abandoned mineral exploration and outfitting camps, meteorological stations) as well as a history of excluding Inuit and Naskapi in planning and remediation in the clean-up of these sites.

The Committee notes the Strategy was also informed by a study that included an examination of the link between race, socio-economic status and environmental risk as well as information and statistics relating to the location of environmental hazards. However, the data collected from this study generally omits Northern Canada and Nunavik. The one figure that highlights potential areas of interest in Northern communities is less detailed than for other areas and is unlikely representative of local communities. The KEAC notes the federal government recognizes this gap and that improving data while respecting Indigenous rights remains a key challenge. As such, the KEAC recommends that discussion involving better data sharing, respectful governance, and community-led research must include Inuit voices from Nunavik and that environmental decision making is shaped by this knowledge. Furthermore, the KEAC recommends that the federal government support Inuit and Naskapi-led research and knowledge generation as well as provide sustainable funding for these initiatives.

Environmental Decision-Making Processes

The Strategy recognizes that affected communities should participate in the decision-making process. It emphasizes enhancing participation, improving access to information, strengthening collaboration, and developing a federal framework for inclusive participation in environmental policies. However, the Strategy focuses primarily on participation in processes, whereas environmental justice requires genuine participation in decisions and the recognition of the knowledge systems that inform them.

A recent example of environmental injustice would be the exclusion of Nunavik Inuit, Naskapi and Eeyou Istchee Cree from fair and meaningful participation in environmental decision-making related to the restoration of the Mid-Canada Line (MCL) sites. The MCL refers to a country-wide radar network for detecting aircraft. It was built by the Canadian government and operated between 1955 and 1965 after which it was abandoned and ceded

to the Quebec government. The complete remediation of these sites has been pending ever since. In 2023, the federal and Quebec governments entered into a Contribution Agreement in which the federal government allocated funds to Quebec for the restoration of thirty-four MCL sites by 2033.

This Agreement had no specific mention of the Inuit, Naskapi or Cree in its text, even though the restoration work affects the territories governed in respect of their specific rights and benefits in accordance with the regimes established under the JBNQA and the Northeastern Quebec Agreement (NEQA). The Federal government was involved in the creation of both treaties and acts as a responsible party. Canada's financial contribution to Québec was not contingent on consultation with nor sought to involve the Inuit, Naskapi or Cree in this work.

Canada and Québec's resistance to include the Inuit, Naskapi and Cree as key partners in the management and planning of this project has created delays in the commencement and eventual completion of the work within the established timeframe. The KEAC is of the opinion that this project requires active and meaningful participation of the three Nations and consideration of the expertise of land users, while creating the economic opportunities as well as partnerships required to fulfill the criteria for social acceptability in the Territory. As stewards of the land and treaty parties, it is vital that the Inuit, Naskapi or Cree be involved in the decision-making process.

Distributive Justice

The Strategy defines distributive justice as the “equitable sharing of environmental benefits and burdens. The goal is that no group bears disproportionate environmental risks based on race, income, or other characteristics, and for affected communities to enjoy a healthy and safe environment”.

Following the signing of the JBNQA in 1975, the 14 Northern Villages (Nunavik Inuit communities) and the Kativik Regional Government (KRG) were legally established under the *Act Respecting Northern Villages and the Kativik Regional Government*, a provincial law providing Nunavik communities with municipality-like status. In most cases, federal programs are either intended for Indigenous communities or organizations (ethnic-based) or for the territories North of 60th parallel. Even though 90% of Nunavik's population is Inuit and a portion of the region lies North of the 60th parallel. However, the Northern Villages and the KRG do not meet the eligibility criteria of federal programs intended for Indigenous or northern communities related to the environment because of Nunavik's unique administrative and political landscape. Some of these federal programs were identified as

crucial for waste management in Environment and Climate Change Canada's 2017 document entitled *Solid waste management for northern and remote communities Planning and technical guidance document*. Although this document was developed to improve the federal government's understanding of waste management issues faced by northern and remote communities in Canada, it provides little information or guidance for the Nunavik region, leading to an unbalanced distribution of resources among the Inuit regions of Canada.

Conclusion

As demonstrated in the examples above, the region of Nunavik would benefit from being an active participant in the development of a Strategy that addresses environmental justice. Also, the KEAC considers that this Strategy could be a significant step forward in the Government of Canada's recognition of issues related to environmental justice and racism. However, it must also include commitments to ensure the federal government leads by example and guarantees that its actions contribute to these objectives.

Best regards,

Pierre-Yves Gagnon
KEAC Chairperson