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Comité consultatif de l'environnement Kativik
Kativik Environmental Advisory Committee

Kuujuaq, September 11, 2026

Christine Dumas
Division of Waste Reduction, Reuse, and Recycling
Ministry of the Environment, Climate Change, Wildlife, and Parks
675, Blvd René-Lévesque East
Québec (Québec) G1R 5V7

Subject: Extended producer responsibility—Adjustments regarding the recovery and reclamation of certain residual materials

Ms. Dumas,

The Kativik Environmental Advisory Committee (KEAC) was established under Section 23 of the James Bay and Northern Quebec Agreement (JBNQA). It is the official forum for the governments responsible for developing laws, regulations, and policies concerning the protection of the environment and the social environment in the territory governed by the JBNQA and located north of the 55th parallel.

Comments on the Regulation respecting a system of selective collection of certain residual materials

The KEAC supports the inclusion of the Kativik Regional Government (KRG) in the definition of “municipal body” in the second paragraph of Article 2. The committee wishes to emphasize, however, that Northern Villages must also be included in this definition, since they are responsible for waste management operations within community boundaries, particularly with regard to collection and the management of local infrastructure.

The KEAC also supports the new timeline proposed in paragraph 3 of Article 12, which is consistent with the amendments proposed earlier this year following discussions between the MELCCFP, the KRG, and the KEAC.

Regarding the addition of Article 12.1, the KEAC has reservations about the wording of the last paragraph, which currently reads as follows: “Producers must, for the same purposes as those provided for in the first paragraph, with respect to the collection and transportation of residual materials in the territory governed by the Kativik Regional Government, promote the entering into of contracts for the collection and transportation of those materials with the Kativik Regional Government and provide for measures to facilitate the participation of social economy enterprises within the meaning of section 3 of the Social Economy Act (chapter E-1.1.1) in the collection and transportation of residual materials.”

The proposed wording should be revised to reflect the actual division of responsibilities within the Nunavik territory. Northern Villages are responsible for the collection and local transportation of waste within their community, while the KRG primarily provides technical assistance, coordination, and support, as well as transportation to the south.

By stipulating that contracts should be awarded to the KRG, the proposed section could create ambiguity and assign operational responsibilities to the KRG that are, more appropriately, the responsibility of the Northern Villages. It would therefore be preferable for the regulation to favour the awarding of contracts to the relevant Northern Villages, while recognizing the KRG’s role in providing technical assistance and regional coordination. The KEAC therefore proposes the following wording:

“Producers must, for the same purposes as those provided for in the first paragraph, with respect to the collection and transportation of residual materials in the territory governed by the Kativik Regional Government, promote the entering into of contracts for the collection and transportation of those materials **with the Northern Villages concerned and provide for the participation of the Kativik Regional Administration as a regional technical assistance and coordination body**, and provide for measures to facilitate the participation of social economy enterprises within the meaning of section 3 of the Social Economy Act (chapter E-1.1.1) in the collection and transportation of residual materials.”

General comments regarding the recovery and reclamation of certain waste materials in Nunavik

The KEAC wishes to take the opportunity of this consultation to highlight certain challenges in implementing the new requirements for the recovery and recycling of certain waste materials in Nunavik.

First, the implementation of a selective collection system in Nunavik is an ambitious project. Currently, funding for operations does not appear to be a major issue; however, funding for infrastructure remains the main obstacle to the implementation of a pilot project in the community Kuujuaq and, consequently, subsequent projects. Over the past year, the KRG has played a major role in seeking out funding sources to make this first project a reality. Although local and regional organizations are enthusiastic about participating in improving waste management in the region, they lack the necessary resources to replace the Québec government or the designated management body when it comes to funding and constructing infrastructure. The KEAC therefore recommends that an adequate funding mechanism be established and tailored to the actual costs of constructing waste management infrastructure in Nunavik.

Given the region's unique logistical, weather and transportation challenges, it is possible that the measures set forth in current regulations do not adequately address the realities of waste management in Nunavik. The waste management landscape in Nunavik is dynamic, and studies are underway to evaluate various scenarios and their feasibility in the region. The forthcoming results of these studies could help regional organizations and the Québec government adjust future approaches to better adapt to the specific realities of Nunavik. In this context, the KEAC encourages the Québec government to view the first selective collection implementation project, scheduled for 2027, as a pilot project to document the success of this approach in the region. For example, data on the actual costs of implementing and operating the system should be collected and made available to better plan the next phases of implementation. In addition, rigorous tracking of the life cycle of collected materials should be planned to assess whether these materials are of sufficient quality to be effectively recycled.

In conclusion, the KEAC hopes that the proposed regulatory amendments and the phased implementation of the collection system will lead to a genuine improvement in waste management in Nunavik, one that adequately addresses the challenges and opportunities specific to the region.

Best regards,

A handwritten signature in black ink that reads "Pierre-Yves Gagnon". The signature is written in a cursive, flowing style.

Pierre-Yves Gagnon
Chairperson, KEAC