



The proposed site to accommodate the new landfill is located approximately 5 km north of the community of Whapmagoostui along the main road and approximately 1.5 km inland via an access road to be built. It should be noted that the access road to be built first crosses Category I Inuit lands and then extends to the proposed landfill site on Category IA Cree lands.

The environmental and social impact assessment study has defined the needs of communities in terms of waste management. This one also allowed to describe the biophysical environment, the human environment as well as the project. Mitigation measures have also been proposed to reduce the risks associated with the project on the biophysical and the social environments. As a result of this study, the main issues raised by the construction of the new landfill and the addition of contaminated soil storage areas on the one hand, and used vehicles on the other, are the air contamination and the surrounding environment through the burning of waste and the surface and groundwater contamination with respect to, especially, the use made of the territory by the Cree and Inuit communities in the project area and downstream hydraulic of it.

The construction and operation of the northern landfill and related infrastructure will generate other direct impacts on land use and uses such as the dismantling of a camp, the reduction of the area for gathering, trapping and hunting, the interruption of roads, the possibility of contamination of a source of water supply and fish habitat, the modification of the landscape, the possible disturbance of wildlife and the modification of hunting and trapping activities.

The current mode of reducing waste volume in the northern landfill is open burning. Smoke can reach communities when pushed by adverse winds. In addition, due to the moisture content of domestic residual materials, the varied content of fuels and the stacking of materials, these fires reach temperatures too low to produce complete combustion and generate large amounts of particulates, PAHs and dioxins and furans.

In addition, given that the northern landfill does not have a leachate collection and treatment system, its potential for surface water contamination, particularly of watercourses and wetlands in poorly drained areas, is non negligible and its impact on ecosystem quality is more than likely.

On the other hand, there seems to be a consensus that the location of the planned landfill about 7.5 km away from inhabited areas will improve the air quality during burning operations compared to the current situation. This should also help to improve security near the airport.

The implementation of a waste management program and good landfill operating practices are complementary and reduce the environmental risk and the social environment of such an infrastructure. In this regard, the proponent is invited to contact the Abitibi-Témiscamingue and Nord-du-Québec regional director of analysis and expertise of the Ministry of the Environment and the Fight against climate change to obtain support and/or information to improve the project and limit the impact of the project on the physical and social environments.

After reviewing the environmental and social impact assessment, it appears that the implementation of the project is justified and aims to improve the management and disposal of residual materials for the communities of Whapmagoostui and Kuujjuarapik. Consequently, and taking into account all the information received concerning this project, COMEX recommends that you authorize the project submitted by the proponent. This recommendation is conditional on the fulfillment of the commitments made by the proponent as well as the respect of the conditions enumerated below.

**Condition 1**

Prior to the implementation of its project, the proponent will be required to provide the Regional Administrator, for information, with the enhanced design of the project to modify the footprint of the landfill away from streams and lakes present in the study area.

**Condition 2**

Prior to the implementation of its project, the proponent must forward to the Regional Administrator, for information, the location of a control well, which must be located outside the influence of the planned activities at the landfill and on the platforms storage. The proponent will need to establish a new baseline in order to properly monitor groundwater quality.

**Condition 3**

Prior to the implementation of its project, the proponent shall confirm to the Regional Administrator that, in the context of another site permitting, there will be no dismantling of vehicles at the platform to accommodate the used vehicles and that any vehicle that has not been properly prepared for storage should be returned and prepared according to good practice.

**Condition 4**

Within six (6) months of project approval, the proponent shall forward to the Regional Administrator, for approval, an environmental and social monitoring program for the construction, operation and closure of the site burial, storage platforms for contaminated soil and used vehicles and metals.

Without limitation, the environmental and social monitoring program should include:

- the monitoring program for the quality of groundwater and surface water (location of sampling points, parameters, frequency of analyzes, etc.);
- a description of the burning activities (frequency, weather conditions, etc.);
- the increase in the landfill's operations (nature and volume of disposed materials, volume of recovery materials used, annual assessment of the area and volume available at the landfill site, updating of the duration of estimated life of the landfill based on these data, etc.);
- the description of the metal storage activities on the platform provided for this purpose (quantity of metals disposed, evolution of platform operation, etc.);
- the description and progression of contaminated soil storage (presentation of the register, analysis results, soil reclamation, etc.);
- a description of the information provided to the communities during the project by the technical committee (transmission of information, taking into account of the concerns raised, keeping of the register of complaints and mitigation measures taken, etc.). As such, water consumption downstream of the site is to be avoided.
- the use made of the territory in the study area of the landfill compared to traditional activities (hunting, gathering, fishing, etc.).

#### **Condition 5**

The proponent will have to send to the Regional Administrator, for information, an annual monitoring report related with the environmental monitoring program and the social environment for the three infrastructures.

#### **Condition 6**

Within six (6) months of project approval, the proponent will have to send to the Regional Administrator, for information, the management program of the residual materials (progress of the use of the landfill, project of installation of an eco-center, composting program, transition from northern landfill to LEET, contaminated soil treatment platform, etc.).

The proponent must provide the Regional Administrator, for information, with an update to the five (5) years of this residual materials management program.

#### **Condition 7**

The proponent must forward to the Regional Administrator, for information, the agreement between the Whapmagoostui First Nation and the northern village of Kuujjuarapik concerning the overall management of residual materials including the management of the proposed landfill and the closure of the various landfill and storage sites.

**Condition 8**

The proponent shall forward to the Regional Administrator, for information, the timeline and closure program for the existing landfill in Kuujjuarapik and the two existing metal storage sites at Kuujjuarapik and Whapmagoostui.

**Condition 9**

The proponent will proceed with the physical restoration of the portions of the borrow pits where material was collected as part of the construction and operation of the proposed landfill.

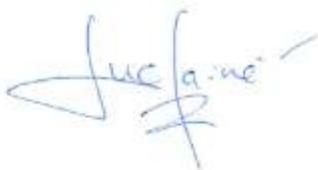
**Condition 10**

The proponent shall forward to the Regional Administrator, for information, the final hydrogeological study and update, if required, the analysis and assessment of the project's environmental and social impacts and adjust the environmental and social measures mitigation to put in place accordingly.

COMEX also wishes to make it clear that this recommendation does not in any way concern the work to be undertaken on Category I Inuit lands, including the restoration of sites currently used for the disposal and storage of residual materials, or work to repair the existing 4.5 km road to the new site and construction of the new access of approximately 550 meters in Inuit lands. The same is true for the rehabilitation project for the Cree ground metal storage site, which is a separate project from the landfill project and will have to be submitted to the Regional Administrator in due course. The authorizations and/or certificates required for these will therefore have to be obtained from the authorities concerned.

In conclusion, COMEX would like to bring to your attention that the management aiming at the middle and long term recovery of residual materials accumulated at the proposed site will have to be encouraged and supported. This is a major issue with potential environmental consequences. This is particularly true in remote areas that are not connected to the rest of the Québec road network. In this sense, the COMEX remains interested in being informed of the partnerships that can be developed and the progress of the measures that will be put forward in the context of this project.

Best regards,



**Luc Lainé**

Chairman

Environmental and Social Impact Review Committee