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Comité consultatif de l'environnement Kativik
Kativik Environmental Advisory Committee

February 4, 2011

Carole Jutras
Water Policies Branch
Ministère du Développement durable, de l'Environnement et des Parcs
675 René-Lévesque Blvd. East
8th Floor, Box 42
Quebec City QC G1R 5V7

Subject: Draft Regulation to amend the Regulation respecting the Quality of Drinking Water

Dear Madam:

Kativik Environmental Advisory Committee

The Kativik Environmental Advisory Committee (KEAC) is a preferential and official forum for the governments of Canada and Québec, as well as the Northern villages, when they draft laws and regulations regarding the environmental and social protection of the territory covered under the *James Bay and Northern Québec Agreement* (JBNQA) north of the 55th parallel. In particular, through the sharing of viewpoints and information, the KEAC monitors the application of Section 23 of the JBNQA.

Involvement on this topic

Pursuant to its mandate, the KEAC involves itself in the environmental strategies and regulations applicable in Nunavik, including drinking water quality. In 2004, the KEAC prepared and submitted a position paper to Minister Thomas J. Mulcair on the draft *Regulation to amend the Regulation respecting the Quality of Drinking Water*. The KEAC also provides assistance to the Northern villages, contributing to drinking water projects such as the project being carried out in cooperation with the *École Polytechnique de Montréal* concerning the cleaning of residential drinking water tanks.

Proposed amendments

Over the last few weeks, the KEAC and the Kativik Regional Government (KRG) reviewed the draft *Regulation to amend the Regulation respecting the Quality of Drinking Water*. The KEAC agrees with the KRG that the main amendments recommended for the territory north of the 55th parallel will be beneficial for Nunavik. Notwithstanding, the KEAC would like to draw special attention below to a few of the proposed amendments.

Section 5.1

As Colilert is the bacterial analysis method (absence/presence) used north of the 55th parallel, *E. coli* is not counted. Water treatment system design criteria are set at < 20 *E. coli* for raw water. Given that water treatment plants in Nunavik meet the requirements of section 22.1, they are exempt from raw water sampling. Consequently, it is difficult to modulate treatment based on the concentration of *E. coli*. It is nonetheless worthwhile to note that the results of raw water source characterizations in Nunavik have always indicated a presence of less than 20 *E. coli*/100 mL of water.

Section 9.2

It must be ensured that Javex and other commercial bleach solutions may be used instead of chlorine. The delivery of chlorine to Nunavik is done by ship during the very short summer season and, on occasion, quantities fall short of needs for the whole year. When this situation occurs, water plant operators are obliged to use commercial bleach solution for disinfectant purposes. Airlifting chlorine is moreover not an alternative solution. Chlorine is considered a hazardous product and transportation costs are therefore very high.

Section 44

In the different communities of Nunavik, difficulties are experienced recruiting and retaining skilled water plant operators. In this context, the KEAC agrees with the KRG that a new category of operator, exclusively north of the 55th parallel, should be created. Northern water plant operators could receive adapted training for the operation of water treatment plants in Nunavik. These plants are relatively different from plants in southern Québec. The adapted training could take into account that drinking water is distributed by truck and not by aqueduct systems, and be modified progressively as aqueduct systems are constructed in certain communities.

Section 44, paragraph 3

In order to facilitate the maintenance and upgrading of water treatment plants in Nunavik, the KEAC agrees with the KRG that “an OIQ-member engineer” or “under the supervision of an OIQ-member engineer” should be added to the list of certified persons provided in paragraph 3.

Allow me to thank you in advance for the careful consideration you will surely give to the KEAC's comments.

Sincerely,

Claude Abel
Chairperson