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Comité consultatif de l'environnement Kativik  
Kativik Environmental Advisory Committee

August 22, 2024

Carl Dufour  
Director of expertise in decarbonation and energy efficiency  
Climate and Energy Transition Office  
Ministère de l'Environnement, de la  
Lutte contre les changements climatiques la Faune et des Parcs  
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**Subject: The KEAC's feedback on the draft regulation prescribing certain prohibitions with regards to motor vehicles and internal combustion engines**

Dear Mr. Dufour,

On July 19, the Kativik Environmental Advisory Committee (KEAC) attended the Ministère de l'Environnement, de la Lutte contre les changements climatiques, de la Faune et des Parcs (MELCCFP) webinar presenting the *Draft regulation prescribing certain prohibitions with regards to motor vehicles and internal combustion engines*. Part of the information package sent prior to the webinar included a copy of the draft regulation as well as the Québec government's analysis document. The KEAC notes the MELCCFP's consideration of the comments forwarded to its attention in the correspondence of March 8, 2024. Within the framework of its mandate, the KEAC wishes to provide feedback on the considerations given to the isolated regions, such as Nunavik, provided for in the analysis document.

### **Increased energy requirements**

In section 4.5 of its current analysis document, the MELCCFP reports that Hydro-Québec's demand forecasts consider the changing energy needs of communities using off-grid systems, including those resulting from the ban on combustion vehicles. Converting the entire vehicle fleet to electricity would increase the total energy demand of these systems by just over 5% from 2035 onwards. The MELCCFP also noted the importance of taking measures to prevent zero-emission vehicles (ZEVs) from being recharged using non-renewable energy sources, such as a gas or petrol-powered generator. According to Hydro-Québec, northern and isolated communities could eventually have access to electricity from renewable sources to recharge

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their vehicles such as solar and wind power projects currently being analyzed in partnership with Tarquti in several Nunavik communities. The KEAC acknowledge this as a positive step towards developing renewable energy projects in the region. The KEAC envisages that the transition to renewable energies will require appropriate time and resources and as such, recommends that the MELCCFP ensure that the addition of electric vehicles does not increase diesel-generated electricity consumption and, consequently, the region's overall greenhouse gas emissions.

### **Access and costs**

Also, in section 4.5 of the analysis document also noted that the cost of recharging is much higher for users of off-grid systems than for users of Hydro-Québec's main grid, since their electricity rates are more than four times higher. Northern villages are subject to the "DN" rate, where the first 40 kWh per day are the same rate as elsewhere in Quebec (at 6,704 cents per kWh), and any electricity used above that threshold is billed at the rate of 45,683 cents per kWh (compared to 10,342 cents for the rest of the province). As most ZEV batteries have a capacity above 60 kWh nowadays, charging an ZEV car in northern communities could increase the overall cost of electricity for a household. As such the KEAC suggest the rate be adjusted to include realities of charging ZEVs in off-grid communities.

Additionally, the MELCCFP conducted an analysis to compare the average cost of recharging an electric vehicle with the cost of fuel to operate a motor vehicle with combustion engine (MVCE) for an individual living in a municipality supplied by an autonomous grid in Nord-du-Québec. This region was selected because it is more remote and less likely to be connected to Hydro-Québec's main grid by 2035. Assuming recharging would take place at home, the annual cost would be \$2,045 to cover a distance of 18,000 km. For a MVCE, the annual cost would be \$4,131, roughly twice the cost of electricity. What's more, regardless of the distance covered, the cost of energy for MVCEs remains twice as high as for a ZEV with the proposed parameters. The KEAC recommends the transition to ZEVs to reduce energy costs for light vehicles, even in remote areas.

The analysis document also recognized the disruption in the supply of maintenance services and replacement parts for MVCEs and that when these types of vehicles are almost completely replaced in the rest of Quebec, it will be difficult to guarantee a regular supply of parts for maintenance in remote regions. The KEAC wishes to underline the issue and recommend providing local mechanics with the skills and tools needed to carry out the required maintenance and repairs on ZEVs.

### **Lifecycle management**

The complex issue of managing damaged and end-of-life vehicles for northern villages was also highlighted during the pre-consultations. For example, transporters may refuse to take damaged electric batteries or

vehicles on board to bring them to proper recycling facilities in southern Quebec. The storage of damaged or used batteries and vehicles, represents a significant burden for Nunavik's isolated communities, who do not have the adapted infrastructures. Furthermore, in the event of recalls, it will be difficult and costly to return Nunavik electric vehicles to dealers since they will have to be transported by air or sea. To reduce this burden, the KEAC recommends that ZEVs, if not all vehicles, be included in the list of products subject to the extended producer responsibility regulations.

Lastly, during previous discussions, the MELCCFP noted that continuous improvements in the range of ZEVs would make it possible to better meet the needs of isolated and northern communities. In addition, the purchase of used MVCEs would continue to be permitted for vehicles from model years prior to 2035 and consumers who prefer to postpone the purchase of a ZEV could do so. Furthermore, the Ministry plans to reassess the maturity of the market in 2030, leaving open the possibility of implementing exceptions or adjustments to the regulations to ensure a successful transition. The KEAC recommend that the 2030 reflection also include specific adaptation possibilities for Nunavik communities, namely carrying out a lifecycle analysis of electric cars specific for Nunavik, introducing electric vehicles in the list of products subject to extended producer responsibility, creating a subsidy program for Nunavik residents once village infrastructures can support the addition of electric vehicles, and supporting northern villages in training mechanics and equipping municipal garages.

The KEAC's mandate is to make recommendations on draft legislation and regulations to facilitate and represent the special conditions of the Nunavik territory. We would like to thank the MELCCFP in advance for considering these recommendations, and we invite the Ministry to demonstrate the necessary adjustments in its reflections and the conduct of its operations.

Finally, the committee remains at the Ministry's disposal for any discussions and support in the northern context regarding this draft regulation.

Best regards,



Marie-Noëlle Fournier  
Vice-Chairperson, KEAC