



October 21, 2024

Josée Bellemare  
Audit Director  
Office of the Auditor General of Québec  
575 Jacques-Parizeau Street, Suite 300  
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**Subject: The KEAC's comments on the northern territory development study**

Dear Ms. Bellemare,

The Kativik Environmental Advisory Committee (KEAC) is the official forum for governments responsible for developing laws, regulations and policies concerning environmental and social protection in the territory governed by the James Bay and Northern Quebec Agreement (JBNQA) and located north of the 55<sup>th</sup> parallel. Following the July 16, 2024, meeting between members of your team and the KEAC analysts, the committee wished to share with you in writing its main observations concerning the issues related to the development of Nunavik's territory.

A meeting was held on July 16, 2024, between members of your team and KEAC analysts to discuss the development of the northern territory. The Auditor General of Québec's (AGQ) team wanted to draw up a portrait of the issues, concerns and governance in place north of the 49<sup>th</sup> parallel, with a specific focus on mining development, impacts on biodiversity and climate change. In response to the VGQ's request, the committee is sharing [its 2022-2023 annual report](#), its [2020-2025 action plan](#), as well as some observations on these issues arising from the KEAC's work. The 2023-2024 annual report will soon be available on the [KEAC's website](#).

**Conservation and biodiversity**

The Plan Nord, launched in 2011, provided for major investment toward the sustainable development of northern territories. The plan's objectives were to ensure the development of local and indigenous communities, develop the economic potential of Northern Quebec, make the North accessible and ensure better environmental protection of the region. To achieve this last objective, the Plan Nord provided, and still

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provides, for the protection of 50% of the Northern Québec territory by 2035. The first 20% of protected areas was reached in 2020, as set forth in the Plan Nord's action plan. To protect the remaining 30%, the government planned to create "northern conservation territories" to protect areas north of the 49<sup>th</sup> parallel from industrial activity. Northern conservation territories were added to the Natural Heritage Conservation Act in 2021, but without any subsequent regulations defining them, setting out the terms and conditions or providing a framework. No guide or definition of activities permitted or prohibited in these protected areas is available to date. Conversely, significant work has been carried out in recent years to establish a framework for new types of protected areas in southern Quebec. Work on defining and framing new types of protected areas in Quebec needs to include northern conservation territories, so that the land protection objectives promised under the Plan Nord can be achieved.

### **Drinking water**

Nunavik has been facing a drinking water crisis for years. In the region, the distribution of drinking water to homes and the management of wastewater is done by tanker truck, except for the northern village of Kuujuarapik, which is connected to the water supply and sewer system. Road conditions, mechanical problems, the availability of human resources and the vagaries of the weather are all factors that can hamper the smooth operation of this distribution system. In some northern villages, it is not uncommon for schools to have to close or medical clinics to have to cut back their services either because of a lack of water or because their wastewater tanks are full. Residents regularly spend many days without running water in their homes impacting personal hygiene and normal household tasks such as washing dishes and clothing.

The distribution of drinking water is already fragile, and the consequences of climate change are likely to worsen the situation, due to increasing extreme weather events and by threatening the water sources themselves. With the recent reforms to flood zone management and the National Water Plan, the Quebec government has launched a major reflection on water issues in the province. However, this reflection, and the strategies proposed, essentially address the issues of southern Quebec. It is urgent that sustainable solutions be found to ensure access to drinking water for all Nunavik residents, considering the particularities of northern communities and the anticipated consequences of climate change.

### **Climate change**

The consequences of climate change will be felt differently in Nunavik than elsewhere in Quebec. The Quebec government has been active in recent years in projects and strategies aimed at combating and adapting to climate change, but these initiatives poorly reflect northern realities. The Plan for a Green Economy, for example, is heavily focused on the electrification of transportation, businesses and heating. For northern villages, whose electricity is generated by diesel power plants, these orientations are neither an option for fighting against, nor an option for adapting to climate change. In this context, the Nunavik Climate

Change Adaptation Strategy, published by Makivik in 2024<sup>1</sup>, is a tool that could guide actions, and associated funding, to address climate change in the region.

Best regards,



André-Anne Gagnon  
Chairperson, KEAC

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<sup>1</sup> [Nunavik Climate Change Adaptation Strategy – LP<sup>ᐱ</sup> – Makivik](#)