



ᑲᑎᑕᑦ ᑩᑕᑎᑕᑦᑎᑦᑕᑦ ᑩᑕᑦᑕᑦᑎᑦᑕᑦ ᑲᑎᑕᑦ  
Comité consultatif de l'environnement Kativik  
Kativik Environmental Advisory Committee

Kuujuuaq, March 6, 2025

**Subject : KEAC feedback on discussion regarding the Draft Regulation on the Reporting of Building Energy Data.**

The Kativik Environmental Advisory Committee (KEAC) was created pursuant to Section 23 of the *James Bay and Northern Québec Agreement* (JBNQA). It is the preferential and official forum for responsible governments regarding laws and regulations related to the environmental and social protection regime for the territory covered under the JBNQA, north of the 55th parallel.

The KEAC's mandate includes overseeing the application and administration of the environmental and social protection regime established under Section 23 of the JBNQA as well as analyzing new regulations, laws and strategies that could have an impact on the environment and social milieu in Nunavik. As such, the KEAC attended the February 11 meeting, organized by the Ministry of Environment, the Fight Against Climate Change and Parks (MELCCFP), regarding *Draft Regulation on the Reporting of Building Energy Data*.

### **Regional Context**

To reach its Green House Gas (GHG) reduction targets in the Plan for a Green Economy of 50% reduction in emissions from building heating by 2030, that Québec must strengthen legislation on climate change mitigation in the building sector. As such, the *Draft Regulation on the Reporting of Building Energy Data* aims to collect information to characterize the energy consumption of buildings, which will eventually lead to a rating system and determining environmental performance standards for building owners. Before we consider its application in Nunavik, the KEAC wish to provide you with some context regarding energy consumption in the region.

Nunavik covers an area of approximately 507,000 km<sup>2</sup> in northern Québec. The 14 Northern Villages in the region have more than 4,000 residential, commercial, and public buildings, all of which rely nearly exclusively on diesel generators for electricity consumption. These villages consume on average a total of 23 million litres of diesel per year, which produces approximately 65,000 tonnes of carbon dioxide annually.

Buildings in Nunavik are heated with oil, which is supplied by the Fédération des coopératives du Nouveau-Québec who own 14 petroleum depots and ensures the sale and distribution of all petroleum products in Nunavik (gasoline, diesel, heating oil etc.). Although there are some

renewable resource energy projects currently online, petroleum products represent the majority source of energy to produce electricity, transportation, and heating in the region.

Additionally, the *Regulation respecting oil-fired heating appliances* does not apply to residential buildings “connected to an independent electric power distribution system” and as such Nunavik buildings are excluded from the Québec government’s objective to reduce man-made greenhouse gas emissions attributable to domestic heating and thus restricting regional initiatives in making a transition from heating to electric for residential heating.

Another consequence of this dependence on petroleum are spills related to inconsistent monitoring, accidents and human error, vandalism, as well as inefficient, outdated or maladapted equipment.

Finally, Nunavik is not connected to southern Québec by a road network. Diesel and other petroleum products are transported by cargo ship to the 14 villages during the ice-free months, approximately June to October, thereby significantly increasing the amount of GHG generated by this system in addition to its very high cost.

### **Applicability of the draft regulation in Nunavik**

Considering the limited time available to provide comments, the KEAC was unable to validate the number of buildings that could be covered by the measures proposed in this draft regulation. However, we have calculated that the surface areas of the largest buildings in Kuujuaq confirms that several buildings are over 2,000m<sup>2</sup> and would therefore be included in the “medium-sized buildings” category of the regulation. It is also likely that some buildings in other villages, such as schools, municipal buildings, retail stores, arenas, hotels or health centers, would also have sufficient surface areas to be covered by the proposed regulation. Additionally, we understand following the February 21<sup>st</sup> meeting between the Kativik Regional Government (KRG), the Kativik Municipal Housing Bureau (KMHB), the KEAC and the MELCCFP, that all institutional buildings, no matter the size will be included as part of the draft regulation. The KEAC consider this as positive as the use of petroleum products for heating in Nunavik is a major issue, no matter the surface area of the buildings.

For the most part, buildings in Nunavik are often owned by public organizations, such as the KMHB, KRG, the 14 Northern Villages, the Nunavik Regional Board of Health and Social Services or the Kativik Ilisarniliriniq School Board. To better guide future energy efficiency projects in Nunavik, data concerning the energy consumption of all the buildings belonging to these organisations would be useful. This data collection would prevent the draft regulation from continuing to widen the gap between the south and the north as it could potentially justify the conversion of some heating systems to electric heating.

The KEAC also notes that the objectives of the draft regulation are to: improve knowledge of the energy profile of large buildings; raise awareness in communities about the energy transition and

the environmental, social and economic impacts of improving the energy performance of buildings; and to facilitate access to financing and training in energy efficiency.

The KEAC considers that these objectives are commendable and necessary to achieve the energy transition objectives put forward by the Government of Quebec. However, the KEAC would like to point out that Nunavik's geographical and energy situation is distinct from that of the other regions in Quebec. The Committee also considers the attribution of a rating system and a performance standard should take into account the climatic realities of Nunavik, since the energy consumption of a building in a northern environment will obviously be higher than that of an equivalent building in the south of the province. In addition, energy transition options remain limited for the time being, as does access to the materials and expertise needed to improve the energy performance of buildings. At present, the set of measures proposed by the MELCCFP would not lead to an improvement in the energy performance of buildings, since solutions adapted to the region are not available.

## Conclusion

Considering that:

- Data pertaining to energy consumption in First Nation and Inuit communities is limited;
- Reports, as required under the proposed regulation, will not provide an accurate portrait of the energy efficiency needs in Nunavik;
- Nunavik organisations want to document the real picture of energy consumption in the region to better guide future actions for the energy transition. -

The KEAC recommends the MELCCFP include articles in the draft regulations specifically targeting Nunavik and aimed at documenting the consumption of all buildings (including small residential buildings) that are the property of public institutions. The requested data could be simplified, for example by documenting the total electricity and heating consumption per village or per owner, rather than per building.

It is important to ensure the region can contribute to provincial objectives of GHG reduction, in its own way, considering its disparities and adapting the draft regulation to its realities. And, above all, that regulations benefit the region by equipping it with the data needed to change standards and practices. This approach should be developed with Nunavik's main partners in terms of housing and building management, to ensure that realistic and appropriate solutions are proposed for Nunavik.

Regards,



André-Anne Gagnon  
Chairperson, KEAC