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Comité consultatif de l'environnement Kativik  
Kativik Environmental Advisory Committee

February 21, 2025

Nicolas Tremblay  
Director  
Public Land Development Department  
Ministry of Natural Resources and Forestry  
5700, 4<sup>th</sup> Avenue West, Suite E-323  
Quebec City, QC  
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**Subject: Amendments to the Program for the allocation of land in the domain of the State for renewable electricity generation and its analytical framework**

Dear Mr. Tremblay,

The Kativik Environmental Advisory Committee (KEAC) would like to thank the Ministry of Natural Resources and Forests (MRNF) for extending an invitation to attend the information session held on January 28, 2025 in which proposed amendments to the Program for the allocation of land in the domain of the State for renewable electricity generation ("Program") and the Analytical framework for the establishment of renewable electricity generation facilities on lands in the domain of the State ("Framework") were presented.

The KEAC is the official forum of the 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. Under article 23.5.26 of the JBNQA, the committee is mandated to study land-use regulations and procedures that could directly affect the rights of the Inuit, Cree and Naskapi.

The KEAC notes that the 2022 amendments to the Program and the 2023 amendments to the Framework had not been communicated to the KEAC for review and wishes to emphasize that any future changes to the Program or Framework should be communicated to the KEAC in a timely manner to allow for analysis of their scope and impact on the environment and social milieu of Nunavik.

Below are the KEAC comments on the draft amendments to the Program and Framework as presented at the January 28 meeting.

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## **Comments on the Program**

The JBNQA provides for a unique land management regime, guaranteeing certain rights to the Inuit, Naskapi and Cree. The specifics of this land regime are not mentioned anywhere in the Program, nor in its proposed amendments. The KEAC believes this Nunavik-specific land regime should be better represented in the Program, not only to ensure consistency with the JBNQA, but also to ensure that promoters of renewable energy projects are adequately informed of the particularities that may apply to their project in this territory. The committee would also like to highlight that the village of Puvirnituq is located on category III lands. The KEAC recommends that the program include specific terms and conditions for Nunavik, clearly integrating the specifics of the land management regime set out in the JBNQA and specifically excludes the municipal territory of Puvirnituq.

The proposed Program amendments intend to allow the reservation of a portion of land for projects arising from an inter-company power sales contract. At present, Bill 69 to ensure the responsible governance of energy resources and amend various legislative provisions has not been passed by the National Assembly. The KEAC believes that it is premature to modify the Program to allow for the sale of electricity between companies, as this practice is not yet permitted by the laws and regulations.

The KEAC would also like to provide context regarding the energy situation in Nunavik. The 14 Northern Villages are powered by diesel plants, each connected to its own autonomous grid. While projects are underway to integrate renewable energies into these autonomous grids, several technical challenges remain. As such the KEAC recommend, for Nunavik, prioritizing projects aimed at decarbonizing community electricity in the allocation of the best renewable energy deposits. As such, the KEAC welcomes the proposed amendment to the Program that would allow the MRNF to select the best project proposed for a given sector, instead of accepting projects on a first come first served basis.

## **Comments on the Analysis Framework**

The KEAC welcomes the MRNF's proposal to update the Framework. The committee notes that the current Framework does not propose any elements of harmonization or incompatibility in relation to aboriginal rights. While the MRNF agrees that outfitting operations and controlled harvesting zones (ZECs) require specific consultations to ensure harmonization in the use of these territories, it seems consistent that Indigenous nations should also be subject to specific consultations when projects affect the territories where they practice their traditional activities. The KEAC recommends that the rights of Indigenous nations, particularly those recognized by treaty, be integrated into the basic guidelines for the allocation of Crown land for renewable energy production facilities.

The KEAC also notes that issues specific to Nunavik are poorly integrated into the proposed analysis tables. The KEAC recommends the MRNF draw inspiration from the Kativik Region Master Plan<sup>1</sup> to identify the principal land-use issues in Nunavik. Discussions should also be opened with Kativik Regional Government and Makivvik to further identify how these priority issues could then be integrated into the analysis framework and be appropriately considered for all renewable electricity generation projects in Nunavik.

## **Conclusion**

The KEAC wishes to emphasize the importance of considering the specific Nunavik context when making changes to the department's frameworks, programs and policies. Northern environments face unique challenges and a unique territorial management regime, which requires special considerations. Given the Quebec government's ambitious objectives for renewable energy development throughout the province, it is crucial to ensure that documents supporting decision-making for project development adequately represent the realities of all regions, including Nunavik.

Best regards,



André-Anne Gagnon  
Chairperson, KEAC

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<sup>1</sup> [MasterPlan\(EN\).pdf](#)