



December 19, 2025

Lucie Ste-Croix, Associate Deputy Minister  
Land and Strategic Affairs Sector  
Ministry of Natural Resources and Forestry  
5700 4<sup>th</sup> Avenue West, Suite A-429  
Quebec City, QC  
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**Subject: Issues related to the allocation of land leases in Nunavik**

Dear Ms. Ste-Croix,

The Kativik Environmental Advisory Committee (KEAC) was established under Section 23 of the James Bay and Northern Quebec Agreement (JBNQA). It is the official forum for the governments responsible for developing laws, regulations, and policies concerning the protection of the environment and the social environment in the territory governed by the JBNQA and located north of the 55<sup>th</sup> parallel. Under Section 23.5.26 of the JBNQA, the KEAC shall review procedures relating to land use that could affect the rights of the Inuit, Naskapi and Cree established under Chapter 24, and can propose changes to responsible governments where appropriate. Section 23.5.28 also states that the committee may be consulted on matters of major importance concerning land use. In this context, the KEAC is actively involved in issues surrounding the use of public lands, particularly regarding the allocation and monitoring of land leases.

*The Act respecting lands in the domain of the State and the Regulation respecting the sale, lease and granting of immovable rights on lands in the domain of the State* regulate the use of public lands and the granting of a lease by the Ministère des Ressources naturelles et des Forêts (MRNF) who determines the conditions for sustainable use, and limit conflicts with other users of the territory. However, considering the observations made in the field by local land users and the Kativik Regional Government (KRG) in recent years, these legislative tools are not adapted to the realities of Nunavik.

First, the monitoring of leases granted by the MRNF as well as illegal occupation of the territory is deficient. This leads to situations that threaten the quality of the environment and, by extension, affect the rights granted to the Inuit, Naskapi and Cree within the JBNQA. The Nunavik territory is immense, and the Inuit, Naskapi and Cree use the whole of their land for traditional activities. Furthermore, while the KRG is conducting regular inspections of land leases and other land uses in Nunavik, the KEAC understands that currently, the

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MRNF cannot rely on these inspection reports to officially monitor illegal activities on the territory. The KEAC therefore recommends a strategy be developed in partnership with the KRG and land users to increase the frequency and validity of inspections in Nunavik. With this in mind, an agreement between the MRNF and the KRG would be a useful tool so that information gathered by the KRG during its inspections could be used as part of the MRNF's monitoring strategy.

In addition, recent discussions with KRG and the MRNF's Direction régionale du Nord-du-Québec et pôle d'expertise en passif environnemental du secteur du territoire et des affaires stratégiques in October 2025, have informed us that, in cases of non-compliance with lease conditions or breach of environmental standards, the options provided for in the current regulations limit the regional MRNF teams' ability to act. For example, inspections conducted by the KRG in 2025 clearly show that several leases granted to outfitters for the installation of permanent outfitting camps in the region are no longer being used for this purpose. The sites are abandoned, dilapidated, and no longer able to accommodate customers. In some instances, hazardous materials left on these sites threaten to contaminate the environment. However, since lease renewal applications are made in accordance with the rules and rent is paid, there is a lack of regulatory power to require the sites to be dismantled, decontaminated and cleaned. Revoking a lease is an option available in the event of non-compliance with lease terms. However, this solution is imperfect, as it shifts responsibility from the lessee to the government and adds to the region's already heavy environmental liability. The KEAC recommends amendments to the *Act respecting lands in the domain of the State* and the *Regulation respecting the sale, lease and granting of immovable rights on lands in the domain of the State* to allow the minister to:

- Act when a breach of lease conditions or environmental standards is observed, through the imposition of dissuasive administrative financial penalties;
- Require the cleanup and decontamination of sites when deemed necessary, even when a lease is still active;
- Request a financial guarantee for cleanup and decontamination when granting commercial leases.

Furthermore, considering the recent observations made by the KRG regarding the condition of certain permanent outfitting camps that are visibly abandoned but for which a lease is still active, and given the positive outcome of the *Strategy to Promote the Vitality and Enhancement of the Northern Heritage* in which nearly 300 mobile outfitting camps were dismantled and remediated, the KEAC recommends that a similar strategy be put in place to require the owners of permanent outfitting sites to clean them up within a reasonable time frame. The KEAC believes that a proactive strategy is required in this matter to prevent these sites from becoming environmental liabilities for the Government of Quebec.

The KEAC notes that recent amendments to the *Regulation respecting the sale, lease and granting of real rights on lands in the domain of the State* now allow the Minister to modify the rights and obligations provided for in a lease when transferring rights. The KEAC was in favour of this amendment at the time of the

consultation and continues to consider this addition to the regulations to be positive. In the same vein, the KEAC recommends that the Minister's powers be extended to allow him to modify the rights and obligations of active leases upon renewal, even if the lessee remains the same. This amendment would allow for regular updates to the environmental requirements of leases, ensuring consistency in the use of Crown lands and better protection of sensitive environments.

Finally, the KEAC wishes to point out that Section 23 of the JBNQA provides that laws and regulations concerning land use in Nunavik should "minimize the negative impact of development in or affecting the Region upon the Native people and the wildlife resources of the Region." The committee's recent observations regarding the monitoring of public land use leases in Nunavik seem to indicate that these provisions of Section 23 are not currently being respected. It is therefore essential that action be taken quickly to remedy the situation.

We thank you for your attention to these recommendations, issued pursuant to Section 23.5.26 of the JBNQA, and ask to be kept informed of the steps the MRNF will take to respond to them.

Best regards,



Michael Barrett  
Chairperson, KEAC

c.c :

Frédéric Guay, Provincial Administrator of Section 23 of the JBNQA  
Véronique Gilbert, Kativik Regional Government