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Comité consultatif de l'environnement Kativik
Kativik Environmental Advisory Committee

May 14, 2026

Stéphane Bouchard
Assistant Deputy Minister for Regions and Land Use Planning
Ministry of Municipal Affairs and Housing
10 Pierre-Olivier-Chauveau Street
Chauveau Wing, 4th Floor
Québec City, QC
G1R 4J3

Subject: The KEAC's comments on Action 9.1 of the National Policy on Architecture and Land Use Planning

Dear Mr. Bouchard,

On March 17, 2026, the Kativik Environmental Advisory Committee (KEAC) participated in a discussion meeting regarding Action 9.1 of the 2023–2027 Implementation Plan for the National Policy on Architecture and Land Use Planning (PNAAT), led by the Ministry of Municipal Affairs and Housing (MAMH). Action 9.1 aims to agree with First Nations and Inuit on the establishment of land use planning discussion groups. This letter aims to address some of the subjects raised in the questionnaire sent to the KEAC on March 20.

First, the KEAC considers that if the Ministry were to opt for the creation of a national working group under Action 9.1, it would be necessary to establish a separate working group for Nunavik. Land use structure in Nunavik is specific to the region and the James Bay and Northern Quebec Agreement (JBNQA) and the governance structure established within ensure that solutions applicable to Nunavik are distinct from those of Quebec. As such, it would be important for this working group's mandate to be clear, to ensure the relevance of discussions and limit the risk of duplicative efforts. Concerning the Ministry's questions regarding the objectives and potential results of the working groups, the KEAC believes the mandate of these groups should include the possibility to issue recommendations on regulatory and legislative amendments in order to improve land use planning in Nunavik and the reconciliation of land uses, in accordance with the rights recognized by the JBNQA.

The KEAC wishes to emphasize that efforts have been underway in Nunavik for several years to update the *Act respecting the Northern Villages and the Kativik Regional Government* (known as the *Kativik Act*). According to the KEAC, it would be advisable to ensure this update is completed, in accordance with Action 9.3 of the PNAAT implementation plan, before creating another working group. Several issues regarding land

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use in Nunavik have been raised in recent years such as abandoned infrastructure and equipment, non-compliance with land-lease conditions and industrial activities interfering with traditional land-uses, underlining the importance for updating the *Kativik Act*. It should be noted that the deadline for amending the *Kativik Act* as per the PNAAT implementation plan is 2025.

Amendments to the *Kativik Act* are also provided for in the Sivunirmut Agreement, which stipulates the Kativik Regional Government (KRG) is allowed to prepare, update, and implement a land use plan for the Kativik region. However, to do so, the proposed amendments to the *Kativik Act* must be approved by the MAMH. The KEAC has been informed that the KRG submitted its proposed amendments to the *Kativik Act* in August 2024 and has yet to receive a response from the MAMH.

Given the urgency of adapting the powers of the KRG to address the many challenges of land use in Nunavik, and to comply with the terms of the Sivunirmut Agreement and the objectives of Action 9.3 of the PNAAT Implementation Plan, the KEAC recommends that updating the *Kativik Act* be considered a priority.

Best regards,



Pierre-Yves Gagnon
Chairperson, KEAC