



Section 1.2 specifically states that, for these territories, “the Parties undertake to implement these processes in accordance with the Conventions and Title II of the LQE, in order to avoid any duplication in the environmental assessment of projects covered by this agreement in northern areas. Canada will rely on these processes to address effects falling within federal jurisdiction to the extent that it is confirmed that these processes will address such effects.”

In its July 21, 2026, letter to the Privy Council Office regarding the **Discussion Paper on Proposed Legislative, Regulatory, and Policy Reforms**, the KEAC reiterated that, pursuant to article 8 of the James Bay and Northern Quebec Native Claims Settlement Act, the JBNQA, its institutions, and its provisions take precedence over any other act that applies to the territory of Nunavik. Section 23 of the JBNQA sets out a comprehensive environmental and social protection regime specific to Nunavik. Under this section and its regime, development projects are subject to specific environmental and social impact assessment procedures and committees. These procedures take precedence over any other impact assessment process.

In the letter, the KEAC also noted that, despite the clear provisions of the JBNQA on this matter, the Impact Assessment Act (IAA) and the Canadian Environmental Assessment Act that preceded it, is often applied to development projects in the region. This issue was notably raised [in the Committee's 2002](#) discussion paper regarding the doubling of federal environmental assessments of Nunavik projects, reiterated [in the 2013](#) letter regarding the multiplication of impact assessment procedures for the Hope's Advance Mining Project near the community of Aupaluk and detailed in [the 2022 report](#) of the Nunavik impact assessment working group.

As such, the KEAC notes the draft agreement's preamble highlights Canada's commitment to initiate discussions with Quebec and the signatories of the JBNQA and NEQA with “a view to amending Schedule 2 of the IAA with the goal of adding the territories to which the James Bay and Northern Quebec Agreement and the Northeastern Quebec Agreement apply, as provided for by section 110 of the IAA, in order to continue to ensure respect for the decision-making roles set out in those treaties, with respect to the environmental assessment of projects subject to the regimes established therein”. Here the KEAC wishes to reiterate its recommendation that clear and sustainable steps be taken towards either excluding the application of federal impact assessment legislation in Nunavik, or to harmonize its application with the processes under

Section 23 of the JBNQA. In this regard, the KEAC also wishes to be consulted regarding the progress of these discussions, as well as of any eventual updates to Schedule 2 of the IAA.

The KEAC welcomes this explicit recognition of the region's unique characteristics and is particularly pleased to learn that discussions will take place to ensure that duplication in environmental and social impact assessment procedures is minimized in the Territory.

Best regards,

*Pierre-Yves Gagnon*

Pierre-Yves Gagnon  
Chairperson, KEAC