

Sent by email only

Québec City, December 20, 2023

Marie-Josée Lizotte
Deputy Minister and Provincial Administrator for Chapter 22
of the James Bay and Northern Québec
Ministère de l'Environnement, de la Lutte contre les changements climatiques,
de la Faune et des Parcs
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Québec (Québec) G1R 5V7

**OBJECT: James Bay lithium mine project by Galaxy Lithium (Canada) inc.
Environmental and social impact assessment study
Transmission of a recommendation
N/Réf : 3214-14-055**

Mrs. Deputy Minister,

The Review Committee (COMEX) received, in October 2018, a first version of the environmental and social impact assessment study for the James Bay lithium mine project by Galaxy Lithium (Canada) Inc. Following the analysis of the impact assessment study, three (3) rounds of questions and comments were sent to the proponent in April 2019, December 2019, and September 2020. The proponent submitted responses to these rounds of questions and comments in July 2019, June 2020, and July 2021, respectively. In July 2021, the proponent also submitted a significant update to the environmental and social impact assessment study to reflect the changes it made to their project.

A fourth round of questions and comments, as well as a request for additional information, were sent to the proponent in January 2022 and August 2022. The proponent submitted responses to these rounds of questions and comments in April 2022 and November 2022, respectively. The COMEX held a series of public hearings for the project, conducted in hybrid mode, in Eastmain and Matagami in January 2023. Following the public hearings, the proponent submitted two (2) series of additional information in April 2023 and November 2023.

The COMEX would like to mention that, throughout the review process, the Committee was often waiting for information that had been requested or announced by the proponent. On a few occasions, the proponent had to submit additional information to clarify certain aspects of the project, such as the final location of their waste rock piles. As a result, all these delays and lack of details have considerably prolonged the analysis of the project. The COMEX would like proponents to be better informed about the environmental and social impact assessment and review procedure of Chapter 22 of the JBNQA, notably the importance of submitting complete responses to the Review Committee's questions and comments.

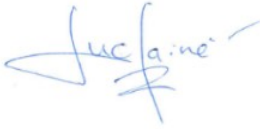
In recent years, the cumulative impact of transportation in the Eeyou Istchee James Bay region has become one of the major concerns for the COMEX, particularly as it is often raised by the Cree communities during public hearings. We discuss this issue in our review report, specifically regarding transportation management and road safety on the Billy Diamond Highway. The potential short- and medium-term development of three (3) lithium-related mining projects, including the James Bay lithium mine project, will increase the number of vehicles circulating in the region, including heavy, non-regulated trucks, and may cause premature degradation of the Billy-Diamond Highway, diminishing the safe usage of the road by various users. In general, proponents underestimate the cumulative impact of transportation related to mining projects. To date, Galaxy Lithium is still unable to adequately specify its transportation plan and assess the associated impacts.

The COMEX is questioning the ability of the Billy-Diamond Highway to support the sustainable development strategies and orientations for critical and strategic minerals that the Government of Quebec wishes to implement in the Eeyou Istchee James Bay region. The Memorandum of Understanding of the Grande Alliance with the Cree Nation Government reflects this need to better regulate transportation in the territory.

There is a lack of coherence on the maintenance, regulation and intervention capacities between the different authorities that manage the road. The COMEX hopes that a coordinated vision on transportation, based on the data provided by the proponents, can help guide the various stakeholders and regulate traffic on the roads in the Eeyou Istchee James Bay territory, to promote their safe use for all users.

Considering all the information received in relation to this project, in accordance with section 162 of the *Environment Quality Act (EQA)* and section 22.6.13 of the *James Bay and Northern Quebec Agreement (JBNQA)*, the COMEX recommends that you authorize this project. The present recommendation is conditional upon compliance with the conditions stipulated in our review report, which you will find attached with this letter. The COMEX assumes that any changes that the proponent wishes to make to its project must be the subject of an application for an amendment to the certificate of authorization.

Best regards,

A handwritten signature in blue ink that reads "Luc Lainé". The signature is stylized, with the first name "Luc" and the last name "Lainé" written in a cursive-like font. There is a horizontal line under the "é" in "Lainé".

Luc Lainé
Chairman
Environmental and Social Impact Review Committee