



Conseil Crie de la santé et des services sociaux de la Baie James  
σ ɔ d ɓ °    ɓ ɓ    Δ ɾ Δ    · Δ · Δ °    Δ q a b ɾ C b σ Δ °  
Cree Board of Health and Social Services of James Bay

**Montreal, March 29**

**Subject: Whabouchi Public Hearings**

In three letters sent to the MSSS on May 16, 2013, June 20, 2014 and July 23, 2014, the Public Health Department of the Cree Board of Health and Social Services of James Bay (CBHSSJB) expressed some concerns after reading the documents titled: *Projet Whabouchi – Étude des impacts sur l’environnement et le milieu social – ÉIEMS, mars 2013; Études des impacts sur l’environnement et le milieu social – réponses aux questions et commentaires du COMEX (N/Réf.: 107034.001) and Mise à jour de l’impact sonore du Projet Whabouchi – Développement et exploitation d’un gisement de spodumène par Nemaska Lithium (3214-14-052)*. Prior to these public hearings, another document available on the COMEX website was reviewed (Dec-2014\_Nemaska\_Resume\_mise-a-jour).

Description of the project:

1. As the mine site and the mine tailings (phases 1 and 2) will be separated by the Route du Nord, many trucks will have to cross that road many times per day. As the Route du Nord is used to travel between Nemaska and Chibougamau, has Nemaska Lithium considered the possibility of constructing an overpass (or other mitigation measure according to transportation norms) in order to avoid any contact between users of the Route du Nord and the trucks from Nemaska Lithium?
2. Nemaska Lithium retains the option of using 100 tons trucks to transport the concentrate of spodumene (lithium) from the mine site to Chapais. Our concerns regarding this option are the likely deterioration of the Route du Nord with a parallel deterioration in the route’s safety for the users on the road.



3. Concerning the security of the pit at the closure of the mine, we would like to have an overview of the structures that will be installed to secure the area for the land users. Will all mining material be removed from the pit prior to allowing the lake to form?

Emergency measures:

1. Can Nemaska Lithium present or clarify the emergency plan in the case where an accident or incident involving the company, happens on the Route du Nord?
  - a. Will public health departments (from regions 10 and 18) be involved? When?
  - b. Is Nemaska Lithium planning to contact the Coordinator of the Regional Civil Security of the CBHSSJB, and the Local Director at the health clinic in Nemaska regarding this matter? When?

Social aspects:

1. Nemaska Lithium plans to adopt type “Zero Tolerance” against drugs and alcohol for the mine workers along with disciplinary measures. Will Nemaska Lithium develop a program regarding rehabilitation measures? Are there measures to limit the circulation of non-community members outside the camp?
2. Are there measures to encourage healthy lifestyles (including healthy nutrition) and integration of Cree workers into the mine workplace?
3. What will be the language used on the mine site?

Impact of noise, air quality and water quality:

1. Noise:
  - a. According to the document produced by Nemaska Lithium (*Mise à jour de l'impact sonore*), the anticipated noise levels should respect the provincial and



federal levels. However, the impacts of noise on the fauna are not discussed, which is an important concern regarding food security for the Cree.

b. Nemaska Lithium has used the zoning category IV in order to assess the impacts of noise. The noise levels that are anticipated by the mine will be under the limits of the zoning category IV (these limits are LAeq, 1h, 55 dBA during the day and LAeq, 1h, 50 dBA during the night). The zoning category IV refers to an industrial area. We have asked to the COMEX Cree representatives if they were satisfied by the answer of the proponent and agreed the choice of zoning category IV instead of category I. We want to remind you that 2 sensitive receptors (Cree camps) would be exposed to noise levels over the limits during the night (40 dBA), during the phase I of the project, if zoning category I was used.

2. Air quality:

a. We still have some concerns about the dust issue that could happen on the site. Will the monitoring committee be informed about the follow-up of the dust management committee?

3. Water quality:

a. The Ministry of the Environment will define the specific criteria for the Whabouchi project. The company will have to meet those criteria prior to reject discharging the water in the Lac des Montagnes. Have measures been taken to ensure the integrity of the pipeline system given the temperature variations in the region.

b. In the document called *Dec 2014\_Nemaska\_Predictions-qualite-effluent* (available on the COMEX website), Nemaska stipulates that considering the predicted concentrations (of contaminants), it is scientifically reasonable to say that the final effluent will not be toxic for the various organisms used in toxicity tests which will be carried out as part of the environmental monitoring program of the Whabouchi project.

i. Knowing that the water and the fish are very important for the Cree, we hope that the Environment Committee, that will be (*or has been*) set up under the Chinuchi agreement (IBA), will closely

