



la Convention  
de la Baie James  
et du Nord québécois

**Comité d'examen des répercussions  
sur l'environnement et le milieu social**

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**MINUTES OF THE  
428th MEETING OF THE REVIEW COMMITTEE  
(Adopted)**

<b>DATE:</b>	September 24, 2024
<b>PLACE:</b>	Videoconference (Teams)
<b>PRESENT:</b>	Luc Lainé, Chairman Daniel Berrouard, Québec Robert Joly, Québec John Paul Murdoch, CNG
<b>ABSENT:</b>	Lucas Del Vecchio, CNG  Sophie Cooper, Executive Secretary

**1) Call to order and adoption of the agenda**

The agenda for the 428th meeting was adopted as presented.

**2) Adoption of the minutes of the 427th meeting**

The minutes of the 427th meeting were adopted as presented.

**Action: Translate and file the 427th meeting minutes.**

**3) Correspondence follow-up**

The follow-up to correspondence between August 14, 2024, and September 24, 2024, is presented in Appendix A.

**4) New landfill development project in the Nemaska area by the Cree Nation of Nemaska**

**Ref.: 3214-16-079**

- a) Environmental and social impact assessment
  - For recommendation

WHEREAS on July 11, 2024, the Review Committee (COMEX) received the environmental and social impact assessment for the landfill development project near Nemaska.

The proponent plans to build and operate a new trench landfill to dispose of waste from the community of Nemaska. This new landfill will replace the existing landfill, which is nearing the end of its life. The new site will be located about 5 km southeast of the community of Nemaska, at km 306 of the Route du Nord. Building a trench landfill was preferred to an engineered landfill, mainly due to the additional costs an engineered landfill would have involved. The proponent also plans to build a 450-metre access road to the site. Construction of the landfill and access road will involve vegetation removal, backfilling, grading and installing structural layers.

The proponent estimates that 215,444 m<sup>3</sup> of waste will be buried there over the next 35 years. Of note, waste from the Hydro-Québec camp will also be buried in this new landfill, as will waste from the Whabouchi mine, which will be operated by Nemaska Lithium, should an agreement be reached. The proponent expects construction to begin in the summer of 2025 and site operations to begin in the fall of 2025.

WHEREAS the members of COMEX have reviewed the documents submitted by the proponent and, after analyzing this information, COMEX wishes to obtain certain clarifications. A letter, along with a document outlining the questions and comments to be submitted to the proponent, will be sent to the Provincial Administrator.

**#2024-0924-01:** *write to the Provincial Administrator informing him that COMEX members have reviewed the documents submitted by the proponent and would like to obtain additional information on various aspects of the project that they feel should be clarified.*

**Action:**           **Send a letter to the Provincial Administrator**  
                          **Submit a request for additional information**  
                          **Forward questions and comments**

**5) James Bay Lithium Mine Project by Galaxy Lithium (Canada) Inc.**

**Ref.: 3214-14-055**

- a) Follow-up on condition 4 – Environmental and social monitoring program
  - For recommendation

WHEREAS on February 12, 2024, the Review Committee (COMEX) received the environmental and social monitoring program for the Galaxy Lithium mining project. This plan was drawn up by the proponent to meet the requirements of condition 4 of the certificate of authorization issued on December 27, 2023. This document also allows for follow-up on conditions 15, 18, 20, 21, 22 and 35 of the certificate of authorization.

A preliminary version of the program was submitted by the proponent on December 28, 2023. Despite updates to the document, the most recent version of the program does not reflect the conditions listed in the certificate of authorization. The document still refers to several requirements and conditions related to federal government authorization, and some sections still do not appear to refer to the Provincial Administrator’s certificate of authorization. COMEX expected to receive an environmental and social monitoring program addressed specifically to it and containing information relevant to its level of authority.

WHEREAS the members of the COMEX have reviewed the environmental and social monitoring program submitted by the proponent and wish to obtain certain clarifications. A letter, along with a document outlining the questions and comments to be forwarded to the proponent, will be sent to the Provincial Administrator.

**#2024-0924-02:** *write to the Provincial Administrator informing him that COMEX members have reviewed the document submitted by the proponent and would like additional information on various aspects of the monitoring projects that they feel should be clarified.*

**Action:**           **Send a letter to the Provincial Administrator**  
                          **Submit a request for additional information**  
                          **Forward questions and comments**

- b) Follow-up on condition 8 - Membrane watertightness monitoring program for haul roads
- For recommendation

WHEREAS on February 12, 2024, the Review Committee (COMEX) received the membrane watertightness monitoring program for the haul roads for the Galaxy Lithium mining project. This program was prepared by the proponent to meet the requirements of condition 8 of the certificate of authorization issued on December 27, 2023.

The haul roads at the mine site will be built using waste rock from the site. As this waste rock is leachable, Directive 019 stipulates that sealing measures must be applied to protect groundwater. To ensure that the structure is watertight, the proponent will install a 1.5-mm thick linear low-density polyethylene (LLDPE) geomembrane in the substructure of the haul road and side ditches. The geomembrane will collect all runoff and leachate, which will be conveyed to the north accumulation pond for final treatment at the mine water treatment plant.

To ensure structures are watertight during construction and operation, the proponent is proposing a geoelectric dipole detection method to detect leaks in the geomembrane. In addition, the proponent plans to carry out annual surveys to monitor premature deterioration of the haul road surface, and corrective maintenance will be carried out if any defects are discovered. Monitoring of groundwater levels and chemical parameters in observation wells will also be planned by the proponent.

WHEREAS the members of COMEX have reviewed the document sent by the proponent. However, to ensure that the information presented in the document provides a satisfactory response to condition 8, COMEX would like to obtain details of the monitoring and quality assurance program for geomembrane watertightness during the operation of the haul road. A letter, with questions and comments to be submitted to the proponent, will be forwarded to the Provincial Administrator.

**#2024-0924-03:** *write to the Provincial Administrator informing him that COMEX members have reviewed the document submitted by the proponent and would like additional information on various aspects of the monitoring projects that they feel should be clarified.*

**Action:            Send a letter to the Provincial Administrator  
                         Submit a request for additional information  
                         Forward questions and comments**

c) Follow-up on conditions of the certificate of authorization

- Condition 24: Transportation management plan for the operations phase

WHEREAS on April 3, 2024, the Review Committee (COMEX) received, for recommendation, the transportation management plan for the operations phase of the Galaxy Lithium mining project. This plan was drawn up by the proponent to meet the requirements of condition 24 of the certificate of authorization issued on December 27, 2023.

The proponent submitted a preliminary version of its transportation management plan in the form of a procedure. The purpose of the procedure is to define the requirements and processes for safe travel on civilian (off-site) roads and on roads and paths at the mine site. The transportation management plan outlines the general rules for driving on the roads, the training and awareness programs that will be offered to drivers, and the rules for off-site travel.

The plan also shows the dimensions and weights of the trucks used to transport concentrates on the road but does not indicate the maximum speed of these vehicles. Passage frequencies and the number of vehicles present on the road during day/night periods, thaw periods, and goose and moose hunting periods are also presented in the transportation management plan.

WHEREAS the members of COMEX have reviewed the preliminary version of the transportation management plan for the operations phase submitted by the proponent. COMEX notes that some of the information requested in condition 24 of the authorization certificate is not included in the document. COMEX therefore considers that the transportation management plan provided by the proponent is incomplete. To continue its analysis, COMEX would like to receive additional information that is missing from the transportation management plan for the operations phase of the mining project. A letter, with questions and comments to be submitted to the proponent, will be sent to the Provincial Administrator.

**#2024-0924-04:** *write to the Provincial Administrator informing him that COMEX members have reviewed the document submitted by the proponent and would like additional information on various aspects of the monitoring projects that they feel should be clarified.*

**Action:            Send a letter to the Provincial Administrator  
                         Submit a request for additional information  
                         Forward questions and comments**

d) Follow-up on conditions of the certificate of authorization

- Condition 26: Agreements with road maintenance managers
  - For information
- Condition 27: Increased road traffic and social and environmental nuisances monitoring program
  - For recommendation

*NOTE: These documents will be handled together to facilitate their analysis.*

WHEREAS on April 9, 2024, COMEX received, for information, a document summarizing the agreement with the road maintenance managers in the vicinity of the Galaxy Lithium mine site. This document was prepared by the proponent to meet the requirements of condition 26 of the certificate of authorization. On April 3, 2024, the Review Committee (COMEX) received, for recommendation, the increased road traffic and social and environmental nuisances monitoring program. This program was prepared by the proponent to meet the requirements of condition 27 of the certificate of authorization issued on December 27, 2023.

The proponent provided a summary of the agreements between Galaxy Lithium (Canada) Inc. (GLCI) and the Société de développement de la Baie-James (SDBJ). This agreement in principle was signed on March 27, 2024. In this agreement, GLCI undertakes to contribute to the maintenance, preservation and safety of the Billy-Diamond Highway due to the impact of adding ore trucks to the existing traffic on this road. Once the transportation management plan is approved in the operations phase (in accordance with condition 24 of the CA), this plan will be submitted to the SDBJ, which will commission a specialized external firm to study the road's current maintenance needs and the additional road safety activities required. The potential impact on the Billy-Diamond Highway due to the addition of GLCI's concentrate trucks will be offset by GLCI. Studies and contributions will not take into account other mining projects using the Billy-Diamond Highway.

For condition 27, four main themes are addressed in the increased road traffic and social and environmental nuisances monitoring program: project-related road traffic, noise, air quality and road safety. For each theme, monitoring indicators are presented, along with the means and frequency of monitoring that will be implemented during the operations phase. An ongoing complaints register will be kept during the operations phase. The results of this operations-phase monitoring program will be presented in the annual environmental and social monitoring reports, as well as during meetings with the various monitoring committees.

WHEREAS COMEX has reviewed the summary of the agreement between GLCI and the SDBJ concerning the maintenance of the Billy-Diamond Highway submitted by the proponent and finds that the document complies with condition 26 of the certificate of authorization. COMEX will inform the Provincial Administrator that it has no comments to make on this matter.

WHEREAS COMEX has taken due note of the increased road traffic and social and environmental nuisances monitoring program submitted by the proponent. It finds that the program meets all the required elements and condition 27 of the certificate of authorization and will recommend that the Provincial Administrator authorize the program.

**#2024-0924-05:** *write to the Provincial Administrator informing him that COMEX members have reviewed the documents submitted by the proponent and recommend that the increased road traffic and social and environmental nuisances monitoring program (condition 27) be authorized. They have no comments to make concerning the agreement between GLCI and the SDBJ on the maintenance of the Billy-Diamond Highway (condition 26).*

**Action:            Send a letter to the Provincial Administrator  
                         Submit a recommendation (condition 27)**

- e) Follow-up on condition 37 – Emergency measures plan
  - For information

WHEREAS on February 21, 2024, the Review Committee (COMEX) received, for information, the emergency measures plan for the Galaxy Lithium mining project. This plan was drawn up by the proponent to meet the requirements of condition 37 of the certificate of authorization.

The purpose of the emergency and crisis response plan is to define and describe the emergency and crisis response arrangements applicable to the mining project site for all phases of the project. It describes the organization and responsibilities of Emergency Management Team (EMT) and Emergency Response Team (ERT) members. This plan provides emergency instructions for the situations mentioned in condition 37 and for many others. Intervention and communication protocols for most of the situations listed are also available in the appendices of the emergency measures plan.

A list of internal and external emergency contacts is provided in the document supplied by the proponent. However, this list of contacts does not include all the government authorities specified in condition 37 of the certificate of authorization.

WHEREAS the members of COMEX have reviewed the emergency measures plan submitted by the proponent. Since the emergency measures plan does not contain all the governmental authorities required under condition 37, COMEX recommends that the Provincial Administrator request that the proponent add them to its emergency measures plan to comply with this condition of the certificate of authorization.

**#2024-0924-06:** *write to the Provincial Administrator to inform him that COMEX members have reviewed the document sent by the proponent and request that the proponent be informed that the missing information must be added to the emergency measures plan.*

**Action:            Send a letter to the Provincial Administrator  
                         Submit a comment**

## **6) Other business**

### **a. COMEX participation in the AQÉI Congress (November 19 and 20, 2024)**

The Executive Secretary informed COMEX members that COMEX Chairman Luc Lainé would be invited to take part in a panel discussion at the 2024 AQÉI Congress on November 19 and 20, 2024. COMEX members are invited to register for the conference.

### **b. Household waste management in EIJB**

The Executive Secretary proposes drafting a monitoring document to guide MELCCF and CNG analysts during the review of a new landfill project in Eeyou Istchee James Bay. The document would summarize the common concerns and issues highlighted in the analysis of previous projects. The Executive Secretary will continue to discuss this subject with the analysts concerned.

### **c. 2025 COMEX site visit**

The possibility of a site visit in 2025 was discussed. There will be consideration regarding which sites or projects to visit.

### **d. Projects on the agenda for the meetings scheduled for October 2024**

- Follow-up of conditions from the certificate of authorization and monitoring programs– James Bay Lithium Mine Project, Galaxy Lithium
- Follow-up of conditions from the certificate of authorization and monitoring programs – Eastmain-1-A and Rupert River diversion project
- Request to amend the certificate of authorization – Wemindji Landfill

## **7) Next meeting**

The next meetings are scheduled for October 22, 2024 and November 27, 2024, by videoconference.

<b>Appendix A</b>					
<b>Follow-up correspondence from August 14, 2024, to September 24, 2024</b>					
<b>Project</b>	<b>From</b>	<b>To</b>	<b>Document</b>	<b>Date</b>	<b>Action - Comments</b>
Whabouchi Mine Project, Nemaska Lithium Inc. Ref.: 3214-14-052	Luc Lainé COMEX	Marie-Josée Lizotte Deputy Minister MELCCFP	AMENDCA - Construction of a permanent camp, an overpass and a bypass road and widening of the Route du Nord - Transmission of a recommendation	Transmitted August 15, 2024 Acknowledged August 15, 2024	<i>For recommendation</i>
Whabouchi Mine Project, Nemaska Lithium Inc. Ref.: 3214-14-052	Luc Lainé COMEX	Marie-Josée Lizotte Deputy Minister MELCCFP	AMENDCA - Optimization of mining operations - Transmission of a request for additional information (questions and comments)	Transmitted August 15, 2024 Acknowledged August 15, 2024	<i>For recommendation</i>
Project to dewater pits J4 and 87 at the former Troilus mine site, Troilus Gold Corp. Ref.: 3214-14-025	Luc Lainé COMEX	Marie-Josée Lizotte Deputy Minister MELCCFP	AMENDCA - Environmental monitoring program – Transmission of comments	Transmitted August 16, 2024 Acknowledged August 16, 2024	<i>For information</i>
	Murielle Vachon MELCCFP	Mathieu Michaud Troilus Gold Corp.		Transmitted September 11, 2024 Received COMEX on September 11, 2024	
Éléonore mining project, Goldcorp Canada Ltd. Ref.: 3214-14-042	Marjorie Bujold Newmont Canada	Marie-Josée Lizotte Deputy Minister MELCCFP	Submission of the 2023 Environmental and Social Monitoring Report - Confidential appendices R-S-T	Transmitted August 11, 2024	<i>For information</i>
	Murielle Vachon MELCCFP	Luc Lainé COMEX		Transmitted August 16, 2024 Received COMEX August 20, 2024	
Wemindji trench landfill development project, Cree Nation of Wemindji Ref.: 3219-16-002	Howard MacDonald Cree Nation of Wemindji	Isaac Voyageur Regional Administrator CNG	AMENDCA - Transmission of additional documents	Transmitted August 20, 2024	<i>For recommendation</i>
	Isaac Voyageur Regional Administrator CNG	Luc Lainé COMEX		Transmitted August 20, 2024 Received COMEX August 20, 2024	

<b>Appendix A</b>					
<b>Follow-up correspondence from August 14, 2024 to September 24, 2024</b>					
<b>Project</b>	<b>To</b>	<b>From</b>	<b>Document</b>	<b>Date</b>	<b>Action - Comments</b>
Eastmain-1-A and Rupert diversion hydroelectric project, Hydro-Québec Ref.: 3214-10-017	Mélissa Gagnon MELCCFP	Marie-Josée Grimard Hydro-Québec	Transmission of correspondence - Hydrology, hydraulics and thermal regime monitoring (2019); Riparian and aquatic vegetation monitoring (2022)	Transmitted August 21, 2024 Received COMEX August 21, 2024	<i>For information</i>
Landfill site for waste near the community of Waswanipi, Cree First Nation of Waswanipi Ref.: 3214-16-068	Luc Lévesque Cree First Nation of Waswanipi	Isaac Voyageur Regional Administrator CNG	Transmission of documents to follow up on condition 2 of the CA and responses to questions and comments (QC-03)	Transmitted August 16, 2024	<i>For recommendation</i>
	Isaac Voyageur Regional Administrator CNG	Luc Lainé COMEX		Transmitted August 22, 2024 Received COMEX August 22, 2024	
Rose lithium-tantalum mining project, CELC Ref.: 3214-14-053	Murielle Vachon MELCCFP	Nancy Duquet-Harvey CELC	Follow-up on condition 7 - Waste management plan	Transmitted September 6, 2024	<i>For information</i>
Rose lithium-tantalum mining project, CELC Ref.: 3214-14-053	Nancy Duquet-Harvey CELC	Marie-Josée Lizotte Deputy Minister MELCCFP	Study reports - Follow-up on conditions 12 and 19 of the certificate of authorization	Transmitted September 13, 2024	<i>For information</i>
	Murielle Vachon MELCCFP	Luc Lainé COMEX		Transmitted September 20, 2024 Received COMEX September 23, 2024	