



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  
435<sup>TH</sup> MEETING OF THE REVIEW COMMITTEE  
(Adopted)**

<b>DATE:</b>	May 27, 2025
<b>PLACE:</b>	Videoconference (Teams)
<b>PRESENT:</b>	Luc Lainé, Chairman Daniel Berrouard, Québec Robert Joly, Québec Lucas Del Vecchio, CNG
<b>ABSENT:</b>	John Paul Murdoch, CNG

Sophie Cooper, Executive Secretary

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

The agenda for the 435<sup>th</sup> meeting was adopted as presented.

**2) Adoption of the minutes of the 434<sup>th</sup> meeting**

The minutes of the 434<sup>th</sup> meeting were adopted as presented.

**Action: Translate and file the 434<sup>th</sup> meeting minutes.**

**3) Correspondence follow-up**

The follow-up to correspondence from May 1, 2025, to May 27, 2025, is presented in Appendix A.

**4) “H section west” and “I” road construction project, Matériaux Blanchet**

**Ref.: 3214-05-075**

- a) Application to amend the CA: forest road extension (phase 2)
- b) Additional information (answers to QC)
- c) Additional information
  - For discussion

On December 22, 2020, the Review Committee (COMEX) received, for recommendation, an application to amend the certificate of authorization, as well as additional information on February 22, 2022, for the forest road extension project (phase 2). A second round of additional information was received on January 9, 2025, informing COMEX that the proponent wished to obtain authorization to continue work on roads H & I beyond the previously authorized phase I, under the winter road class.

After discussion, COMEX members wish to obtain additional information from the Cree Nation Government and the MELCCFP’s wildlife management department. COMEX will continue its review of the project once this information has been considered.

**5) Barry and Moroy gold ore processing project at the Bachelor site and increase in milling rate, Bonterra Resources**

**Ref.: 3214-14-027**

- a) Environmental and social impact study
- b) Additional information (geochemical characterization report)
- c) Additional information (elements missing from QC01 answers)
- d) Additional information (addendum – QC01 answers)
- e) Additional information (QC02 answers)
- f) Additional information (QC03 answers)
  - For recommendation

WHEREAS on December 18, 2019, the Review Committee (COMEX) received, for recommendation, the environmental and social impact study for the Barry and Moroy projects' gold ore processing project at the Bachelor site and increase in the milling rate. On February 5, 2020, the COMEX received the geochemical characterization report for the Bachelor mine project, which prompted a round of questions and comments that was sent to the proponent in May 2020. The proponent submitted its responses to this round of questions and comments, as well as an addendum to its responses, on November 26, 2020, and April 19, 2021, respectively. On November 11, 2022, COMEX received the proponent's responses to the second round of questions and comments sent to it in November 2021. A third round of questions and comments was sent to the proponent in April 2023, and COMEX received the proponent's answers on January 28, 2025.

WHEREAS following its analysis, the COMEX wishes to obtain additional information on various aspects of the project that will enable the Review Committee to proceed to the next stage of the project assessment and review procedure, namely holding public hearings.

**#2025-0527-01:** *write to the Provincial Administrator informing him that COMEX members have reviewed the documents submitted by the proponent and wish to submit a request for additional information to the proponent.*

**Action:**            **Send a letter to the Provincial Administrator**  
                         **Send a request for additional information**

**6) James Bay lithium mine project, Galaxy Lithium (Canada) Inc.**  
**Ref.: 3214-14-055**

- a) Geomembrane waterproofing and haul road construction monitoring program  
    ➤ For recommendation

WHEREAS on February 12, 2024, the Review Committee (COMEX) received, for recommendation, the monitoring program for waterproofing the haul roads for the James Bay lithium mining project. This plan was produced by the proponent to meet the requirements of condition 8 of the certificate of authorization issued on December 27, 2023. Additional information was received on January 24, 2025.

WHEREAS the members of COMEX consider that the proponent does not adequately address the concerns raised by the Review Committee, especially since this is the first mining project in the Eeyou Istchee James Bay region that proposes to install a geomembrane under its haul roads. The monitoring program is lacking thoroughness and foresight, since no new mitigation measures or follow-up methods other than the dipole method have been introduced to monitor the membrane's effectiveness and durability.

WHEREAS, considering all the information received on this project, COMEX recommends conditional authorization of the geomembrane watertightness and haul road

construction monitoring program. The aim is to broaden the scope of the proposed monitoring program, particularly in terms of monitoring geomembrane performance and durability.

COMEX therefore recommends the following conditions:

Condition 1:

The proponent must include geomembrane performance monitoring in its annual monitoring program. This monitoring must include, at minimum and without limitation, the results of differential settlement observations, water quality monitoring data from observation wells located on either side of the haul roads, and the results of preventive geomembrane condition verification tests performed using the geoelectric dipole leak detection method. The proponent must conduct additional tests in the event of extreme climate events or technological incidents.

The geomembrane performance monitoring program must be submitted to the Provincial Administrator for authorization. The authorized version of the geomembrane performance monitoring program must be submitted with the application for ministerial authorization to mine the ore. The results of geomembrane performance monitoring must be presented annually to the Provincial Administrator, for information, in the environmental monitoring report. These results must be filed in a format agreed with the Ministère that enables them to be analyzed. If the results are not to the satisfaction of the Ministère, additional monitoring measures must be implemented and presented in the geomembrane performance monitoring to detect leaks in the road and its ditches more quickly.

The proponent must also add monitoring of the membrane's integrity to its monitoring program. This must be carried out halfway through the life of the mine authorized in the original certificate of authorization to ensure its durability and watertightness and to demonstrate that the wear process is occurring as expected.

The results of membrane integrity monitoring must be presented to the Provincial Administrator, for information, in the environmental monitoring report for the year in which the monitoring was carried out. If results do not meet expectations, the proponent will have to implement additional mitigation measures or replace the membrane in the event of severe and premature degradation.

Condition 2:

For any extension of the mine life beyond that authorized in the original certificate of authorization, the proponent must file an application to amend the certificate of authorization. As part of this application, the proponent will have to demonstrate that the membrane is in good enough condition to ensure the watertightness of the haul roads and ditches for the planned extension. If not, the proponent will have to submit additional mitigation measures or even replace the membrane.

**#2025-0527-02:** *write to the Provincial Administrator informing him that COMEX members have reviewed the documents submitted by the proponent and recommend that the geomembrane watertightness and haul road construction monitoring program be authorized, with conditions.*

**Action:            Send a letter to the Provincial Administrator  
                         Forward a recommendation**

**7) Other business**

- a) **Windfall mining project** – Questions about the wetland and bodies of water (WBW) compensation plan

The proponent, Windfall Mining Group, would like to know if certain restoration projects it has already carried out could be integrated into its wetland and bodies of water compensation plan. COMEX members have stated that they cannot prevent a proponent from including such projects in its compensation plan. However, the proponent must thoroughly demonstrate the real environmental gains associated with these previous projects.

- b) **Field trips**

The Executive Secretary informed COMEX members of the possibility of organizing a field trip to the Eeyou Istchee James Bay region in 2025–2026. Two options are being considered: (1) combining the visit with a public hearing, or (2) combining it with a COMEX meeting held in the area. She will submit budget forecasts and a proposed itinerary for each scenario for review.

- c) **COMEX website**

The Executive Secretary informed COMEX members that the COMEX website is becoming increasingly difficult to update, largely due to a lack of storage space to publish lengthy documents like impact studies. She will contact Solution Web Verteb, the site designer, to explore possibilities to update the COMEX website.

**d) 2024–2025 COMEX annual report**

This discussion item will be postponed to the next meeting scheduled for June 26, 2025, due to the Chairman's departure before the end of the meeting.

**e) Projects on the agenda for the meetings scheduled for spring 2025**

- Eastmain and Rupert diversion hydroelectric project – Monitoring reports
- Whabouchi mining project – MODCA: Extension of temporary camp use
- Rose Lithium-Tantalum mining project – Condition monitoring
- James Bay lithium mine project – Condition monitoring

**8) Next meetings**

The next meeting is scheduled for June 26, 2025, by videoconference. The dates of the July and September 2025 meetings will be decided at the June meeting.

Schedule A					
Follow-up correspondence from May 1, 2025, to May 27, 2025					
Project	To	From	Document	Date	Action - comments
Windfall mining project, Windfall Mining Group Ref.: 3214-14-059	Mélissa Gagnon MELCCFP	Andréanne Boisvert Windfall Mining Group	Environmental and social impact study – transmission of a 2 <sup>nd</sup> round of questions and comments	Sent May 1, 2025 Received COMEX May 5, 2025	<i>For recommendation</i>
James Bay lithium mine project, Galaxy Lithium Inc. Ref.: 3214-14-055	Denis Couture Galaxy Lithium Inc.	Marie-Josée Lizotte Deputy Minister MELCCFP	Monitoring of condition 24: transportation management plan – transmission of answers to questions and comments	Sent April 8, 2025	<i>For recommendation</i>
	Mélissa Gagnon MELCCFP	Luc Lainé COMEX		Sent May 1, 2025 Received COMEX May 6, 2025	
Inspection report – James Bay Lithium, Cree Nation Government	Annie Cassista MELCCFP	Graeme Morin CNG	Transmission of the response from the Abitibi-Témiscamingue and Nord-du-Québec regional environmental monitoring department	Sent May 7, 2025 Received COMEX May 7, 2025	<i>For information</i>
Whabouchi spodumene mine project, Nemaska Lithium Ref.: 3214-14-052	Denis Isabel Nemaska Lithium	Marie-Josée Lizotte Deputy Minister MELCCFP	2024 environmental and social monitoring report	Sent March 15, 2025	<i>For information</i>
	Mélissa Gagnon MELCCFP	Luc Lainé COMEX		Sent May 13, 2025 Received COMEX May 14, 2025	
Éléonore mining project, Dhilmar Éléonore Ref.: 3214-14-042	Luc Lainé COMEX	Marie-Josée Lizotte Deputy Minister MELCCFP	Application to amend the certificate of authorization: expansion of the mine tailings site (MTS) – transmission of a recommendation	Sent May 15, 2025 Acknowledged May 15, 2025	<i>For recommendation</i>
	Mélissa Gagnon MELCCFP	Geneviève Pépin Dhilmar Éléonore	Transmission of the amendment to the certificate of authorization	Sent May 22, 2025 Received COMEX May 22, 2025	

**Schedule A**  
**Follow-up correspondence from May 1, 2025, to May 27, 2025**

<b>Project</b>	<b>To</b>	<b>From</b>	<b>Document</b>	<b>Date</b>	<b>Action - comments</b>
Barry and Moroy gold ore processing project, Bonterra Resources Ref.: 3214-14-027	Marc-André Pelletier Bonterra Resources	Marie-Josée Lizotte Deputy Minister MELCCFP	Transmission of additional information – Addendum QC3-2 and Appendix F: atmospheric modelling	Sent February 6, 2025, and completed May 9, 2025	<i>For recommendation</i>
	Mélissa Gagnon MELCCFP	Luc Lainé COMEX		Sent May 13, 2025 Received COMEX May 20, 2025	
Barry and Moroy gold ore processing project, Bonterra Resources Ref.: 3214-14-027	Marc-André Pelletier Bonterra Resources	Marie-Josée Lizotte Deputy Minister MELCCFP	2024 environmental and social monitoring report	Sent March 27, 2025	<i>For your information</i>
	Mélissa Gagnon MELCCFP	Luc Lainé COMEX		Sent May 16, 2025 Received COMEX May 20, 2025	
Renard diamond mine project, Stornoway Diamonds Inc. Ref.: 3214-14-041	Luc Lainé COMEX	Marie-Josée Lizotte Deputy Minister MELCCFP	Update on status of operations – transmission of questions and comments	Sent May 27, 2025	<i>For your information</i>