



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

**DATE:** July 29, 2025

**PLACE:** Videoconference (Teams)

**PRESENT:** Luc Lainé, Chairman  
Daniel Berrouard, Québec  
Robert Joly, Québec  
John Paul Murdoch, Grand Chief, CNG  
Lucas Del Vecchio, CNG

Sophie Cooper, Executive Secretary

**1) Congratulations to the new Grand Chief of the Cree Nation**

The members of COMEX congratulated John Paul Murdoch on his recent election as Grand Chief of the Grand Council of the Crees.

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

The agenda for the 437<sup>th</sup> meeting was adopted as presented.

**3) Adoption of the minutes of the 436<sup>th</sup> meeting**

The minutes of the 436<sup>th</sup> meeting were adopted as presented.

**Action: Translate and file the 436<sup>th</sup> meeting minutes**

**4) Correspondence follow-up**

The follow-up correspondence from June 27, 2025, to July 29, 2025, is presented in Appendix A.

**5) Eastmain-1-A hydroelectric project and Rupert diversion**

**Ref.: 3214-10-017**

a) Eelgrass monitoring on the northeast coast of James Bay - 2019

➤ For information

WHEREAS on March 9, 2023, the Review Committee (COMEX) received, for information, the 2019 follow-up report on eelgrass on the northeast coast of James Bay in connection with the Eastmain-1-A hydroelectric project and Rupert River diversion. This monitoring was carried out by the proponent to meet the requirements of condition 5.35 of the certificate of authorization issued on November 24, 2006, as well as condition 1 of the amendment to the certificate of authorization issued on July 28, 2008.

The main objective of the monitoring was to document changes in eelgrass cover since the decline observed in 1998–1999. To do this, the results of the 2019 campaign were compared with those of the previous campaigns in 1996 and 2014. A more comprehensive assessment covering all monitoring years (2004, 2009, 2011, 2014 and 2019), as well as the 1988–2000 period as part of Phase II of the La Grande complex, will be presented in a separate report to follow.

The documentation provided shows that eelgrass has recolonized the intertidal environment on the east coast of James Bay, although not to the extent observed prior to the 1998–1999 decline. The Tees, Dead Duck and Many Islands bays show comparable levels of seagrass to 1996. Recolonization is therefore underway, but remains incomplete. It is reasonable to believe that the situation will continue to improve at most testing and verification points.

WHEREAS COMEX has reviewed the documents submitted by the proponent and considers that the 2019 monitoring report on eelgrass allows for the dissemination of results in accordance with condition 4 of the amendment to the certificate of authorization issued on July 28, 2008. However, it does not address the objectives of culturally appropriate communication with the Cree. This condition has therefore only partially been met.

COMEX would like to highlight the proponent's initiative to produce an overall report on the environmental monitoring carried out on eelgrass since 1998. Although this approach is not a requirement of the initial project authorization or of subsequent applications to amend the certificate of authorization, it is appreciated and demonstrates a serious commitment to transparency and consideration of long-term environmental issues.

COMEX suggests that the proponent take this opportunity to include a section dedicated to the observations of Cree communities, based on their ancestral knowledge, to enrich the scientific analysis with an Indigenous perspective.

COMEX would also like to point out that the results of the analysis of surface water samples collected during the campaigns will be published in a report written by ISMER.

WHEREAS COMEX will send a letter to the Provincial Administrator to confirm that it has reviewed the 2019 eelgrass monitoring report, that it has no comments to make at this stage, and that it is awaiting the complete environmental monitoring report before forwarding its comments. It will also ask for details of the expected date of submission of this report, as well as an estimated publication date for the ISMER report on the results of the analysis of surface water samples.

**#2025-0729-01:** *write to the Provincial Administrator informing him that the members of COMEX have reviewed the document submitted by the proponent and are awaiting the complete results of the monitoring years before transmitting their comments.*

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

- b) 2020–2021 Cree land use monitoring
  - For information

WHEREAS on January 9, 2025, the Review Committee (COMEX) received, for information, the 2020–2021 follow-up report on land use by the Crees for the Eastmain-1-A and Rupert River diversion hydroelectric project. This monitoring was conducted by the proponent to meet the requirements of conditions 6.10 and 6.13 of the certificate of authorization issued on November 24, 2006, as well as condition 1 of the amendment to the certificate of authorization issued on July 28, 2008. This is the sixth and final study of the project’s impact on Cree land use. Unlike previous studies (2007–2016), which covered all the affected land, this study focuses solely on the Rupert diversion bays and surrounding area.

The study aimed to document the impacts of the project’s operation phase on land use and assess the effectiveness of adaptation and enhancement measures since the last study (2015–2016). The study describes hunting, fishing and trapping activities carried out in the area in 2020–2021 and identifies changes from 2015–2016 and their causes. The proponent also gathered users’ feedback on the mitigation and enhancement measures implemented since the last follow-up, as well as their concerns.

As a reminder, the initial impact study predicted that users would have to adapt to new navigation conditions in the diversion bays and that several traditional fishing, hunting and trapping sites would be lost. The effects identified in the 2020–2021 follow-up are similar to those in the previous report (2015–2016): navigation difficulties, mistrust among users who use snowmobiles in the diversion bays, reduced fishing and hunting of geese and moose, an impact on trapping, and persistent concerns about water and fish quality, particularly due to mercury levels. Furthermore, a sense of lost land is still present among those surveyed.

Users would like to be better informed of the dates of operation of the structures in order to improve navigation in the diversion bays. Since 2016, flow release dates have been variable, accentuating the need for communication. Users would also like to see continued monitoring of fish quality, particularly in relation to mercury.

Although a number of measures implemented by Hydro-Québec and Niskamoon Corporation have helped alleviate the sense of loss, sadness remains among users. Some fear that future generations will not be able to access the territory safely, which could lead to a loss of interest in traditional Cree activities. Others express a desire to pass on this knowledge and strengthen young people’s sense of ownership of the region.

In general, the Cree have shown great resilience and continue to adapt, particularly with regard to new hunting sites. However, navigational safety and accessibility issues remain major obstacles. The adaptation process is still ongoing.

WHEREAS COMEX has examined the documents submitted by the proponent. The report states that the Cree have been profoundly affected by the changes to the land associated with the hydroelectric project. Although adaptation is a lengthy process, land users are showing resilience and continuing their traditional activities.

WHEREAS COMEX will send a letter to the Provincial Administrator confirming that it has reviewed the 2020–2021 Cree Land Use Report and considers that conditions 6.10 and 6.13 have been met. However, COMEX points out that an analysis of land use by other groups, notably residents of James Bay, would have been useful.

COMEX also proposes that an overall summary of the impacts of the Eastmain-Sarcelle-Rupert complex be produced. This summary could take the form of a presentation, a discussion session or a symposium, depending on the form chosen by Hydro-Québec.

**#2025-0729-02:** *write to the Provincial Administrator informing him that the members of COMEX have reviewed the document submitted by the proponent.*

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

**6) Whabouchi mining project, Nemaska Lithium Inc.**

**Ref.: 3214-14-052**

- a) Application to amend the CA: Extension of temporary camp use
  - For recommendation

WHEREAS on April 16, 2025, the Review Committee (COMEX) received, for recommendation, an application to amend the certificate of authorization to extend the use of the temporary camp at the Whabouchi mine site beyond December 1, 2025, the date specified in the previous amendment issued on October 2, 2024.

The proponent is justifying this application due to the resumption of construction work, which was delayed by supply difficulties and by replacing the firm responsible for management. It also states that temporary facilities will have to coexist with permanent ones during commissioning and optimization of mining operations before the temporary facilities are dismantled in 2028.

WHEREAS COMEX considers that the extension of camp use will not result in any environmental or social impacts in addition to the ones already authorized. However, uncertainties remain over the timetable for dismantling the temporary camp, the current number of workers on site, and the capacity of the drinking water treatment and distribution facilities, and wastewater treatment to meet the needs of the 250 workers.

WHEREAS the members of COMEX have reviewed the document submitted by the proponent and wish to obtain further details on several aspects of the project that they feel should be clarified. This application is a second extension of the use of temporary infrastructure, which is only authorized for a capacity of 250 workers. A letter containing COMEX's questions and comments will be sent to the Provincial Administrator to be forwarded to the proponent.

**#2025-0729-03:** *write to the Provincial Administrator informing him that the members of COMEX have reviewed the documents submitted by the proponent and recommend that questions and comments be forwarded to the proponent.*

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

**7) James Bay lithium mine project, Galaxy Lithium (Canada) Inc.**

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

- a) Application to amend the CA: Heating strategy
  - For recommendation

WHEREAS on June 9, 2025, the Review Committee (COMEX) received, for recommendation, an application to amend the certificate of authorization issued on December 27, 2023, concerning the design and energy supply of the heating and ventilation system for the process plant and buildings located in the industrial sector of the mine.

The proponent is proposing to replace the originally planned electric unit heaters with two propane-fired boilers to provide heating for the treatment plant buildings via a water-glycol circuit. This amendment is being justified by the inadequacy of the chosen power line, which does not meet the site's energy needs during the winter period. According to the proponent, an update of the initial concept resulted in a significant increase in electrical loads, exceeding the 8 MW planned.

It should be remembered that the proponent had the option of supplying the entire project with renewable energy. This issue was raised several times by COMEX and the MELCCFP during the environmental and social impact review process. Despite these discussions, the proponent opted for a connection to a 69 kV line with a maximum capacity of 7.8 MW.

In the documents appended to its application, the proponent indicates that two diesel generators will operate simultaneously at full load to meet the increased energy requirements. However, the use of these generators has only been authorized for emergency situations (e.g., in the event of a power outage) or to meet certain needs during peak periods. As a result, the proponent cannot use them on an ongoing basis without submitting an application to amend the certificate of authorization to this effect.

The use of propane for heating and diesel generators to produce additional electricity without presenting alternatives that use renewable sources raises significant concerns. In addition, condition 28 of the certificate of authorization requires the proponent to reassess the possibility of eliminating the use of fossil fuels for the project's energy needs.

Finally, the application to amend the certificate of authorization is incomplete. The proponent has not provided details about the increased energy requirements or explained the discrepancy between the electricity requirements detailed in the initial impact study and those presented in the current application. No justification has been given for using fossil fuels to meet these new needs.

WHEREAS the members of COMEX have reviewed the document submitted by the proponent and wish to obtain clarification on several aspects of the application to amend the certificate of authorization that they feel should be clarified. They consider the application incomplete and in breach of condition 28 of the certificate of authorization, which requires a reassessment of fossil fuel use. A letter, along with a document outlining questions and comments to submit to the proponent, will be forwarded to the Provincial Administrator.

**#2025-0729-04:** *write to the Provincial Administrator informing him that the members of COMEX have reviewed the document submitted by the proponent and recommend that questions and comments be forwarded to the proponent.*

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

- b) Monitoring of condition 14: Fish habitat compensation plan  
*Additional information: Answers QC01*  
    ➤ For recommendation

WHEREAS on February 21, 2024, the Review Committee (COMEX) received, for recommendation, the fish habitat compensation plan for the Galaxy Lithium mining project. This plan was drawn up by the proponent to meet the requirements of condition 14 of the certificate of authorization issued on December 27, 2023. Further information was received on June 6, 2025.

The footprint of the Galaxy mining project will result in the loss of aquatic habitats due to the dewatering of Lac Kapisikama, the construction of a culvert on stream CE3 and the lowering of water flow in streams CE3 and CE4 in connection with lowering the water table. To compensate for these losses, the proponent is proposing to replace two defective culverts on a watercourse located 150 km north of the mine site. The aim is to re-establish free fish passage between a body of water about 100 m downstream of the culverts and a few hundred metres of watercourse upstream.

The compensation plan has been updated to include the final areas to be compensated, as well as a complete assessment of fish habitat losses. However, the proposed project does not appear to take the needs and concerns of Cree land users into account, as stipulated in condition 14 of the certificate of authorization. Following consultations with the communities of Chisasibi, Wemindji and Eastmain, the proponent will have to reassess the possibility of adding one or more compensation projects that would better meet the expectations expressed by the community most impacted by the project, Eastmain.

WHEREAS the members of COMEX have reviewed the document submitted by the proponent and consider that condition 14 of the certificate of authorization has not been fully met. They would like additional information on various aspects of the compensation plan that they feel should be clarified. A letter, along with a second set of questions and comments, will be sent to the Provincial Administrator.

**#2025-0729-05:** *write to the Provincial Administrator informing him that the members of COMEX have reviewed the document submitted by the proponent and recommend that a second set of questions and comments be sent to the proponent.*

**Action:**            **Send a letter to the Provincial Administrator**  
                         **Send a request for additional information**  
                         **Send questions and comments (2<sup>nd</sup> round)**

**8) Natural aggregate bed mining project on James Bay Cree Nation Category II lands,  
Cree Nation of Waskaganish  
Ref.: 3214-03-030**

- a) Application to amend the CA: Adjustment of bed mining periods
  - For recommendation

WHEREAS on June 10, 2025, the Review Committee (COMEX) received, for recommendation, an application to amend the certificate of authorization issued on June 8, 2015, relating to the aggregate mining project by the Cree Nation of Waskaganish.

When the certificate of authorization was issued, an operating period was specified for each quarry and sandpit. With the growth of the Waskaganish First Nation community, the need for granular materials has increased in recent years. With the WA-25-D and WA-25-E sites now exhausted, the proponent wishes to bring forward the development of previously authorized sandpits, notably WA-38, WA-47 and WA-51.

No environmental issues have been identified in connection with bringing forward the mining dates. However, the proponent has failed to comply with several conditions of the certificate of authorization issued on June 8, 2015. Conditions 1, 4 and 5, which require information to be submitted prior to starting work at site WA-51, have not been met. In addition, no documentation has been provided concerning the operation of sites WA-25-D and WA-25-E, as specified in condition 3.

WHEREAS the members of COMEX consider that bringing the mining dates forward does not present any environmental risks. However, due to non-compliance with several conditions of the certificate of authorization issued on June 8, 2015, COMEX recommends authorizing the requested amendment with conditions.

Condition 1 (WA-51 site):

By July 1, 2026, the proponent must submit the following to the Provincial Administrator for approval:

- Information regarding access road improvements, the location of water crossings, and the demarcation of mined areas for the WA-51 sand pit, in accordance with condition 1 of the certificate of authorization issued on June 8, 2015.

By July 1, 2026, the proponent must also forward the following information to the Provincial Administrator:

- The action plan for the operation of the WA-51 sand pit, as proposed in section 7.1 of the September 2014 impact study and specified in condition 4 of the certificate of authorization issued on June 8, 2015, including the proposed corrective measures.

Condition 2 (WA-51 site):

By July 1, 2026, the proponent must forward the following information to the Provincial Administrator:

- A report presenting the results of visual inspections carried out by an archaeologist on site WA-51, specifying whether archaeological inventories are required.
- Minutes of meetings with tallymen and land users concerned, indicating concerns raised and accommodation measures being planned, as well as any document attesting to the tallyman's consent to the operation of site WA-51.

These meetings are scheduled to take place as soon as operations begin at site WA-51.

Condition 3 (sites CA-27, WA-25-D and WA-25-E):

By July 1, 2026, the proponent must submit to the Provincial Administrator, for information, a monitoring report on the progress of the operation and progressive redevelopment of sites CA-27, WA-25-D and WA-25-E, as stipulated in condition 3 of the certificate of authorization issued on June 8, 2015. This report must include:

- Improvements to access roads, the location of water crossings and the demarcation of mined areas.
- The action plan implemented, mitigation measures followed and corrective measures taken, if any.

Furthermore, COMEX will remind the proponent that the initial conditions of the certificate of authorization issued on June 8, 2015, remain valid, and that the operation of sites CA-33A and CA-49B must be carried out in compliance with them. Finally, the proponent will be asked to consult the most recent version of the *Regulation respecting sandpits and quarries* (RSPQ) before proceeding with the operation of authorized sites.

**#2025-0729-06:** *write to the Provincial Administrator informing him that the members of COMEX have reviewed the document submitted by the proponent and recommend that the requested amendment be authorized, with conditions.*

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

**9) Other business**

**a) Proponent's response: Extension of Route 167 North to the Otish Mountains**

COMEX was informed that signage had been installed at the boundaries of the Réserve faunique des Lacs-Albanel-Mistassini-et-Waconichi. The signs at the boundaries of Parc national Nibiischii will be installed once Nibiischii Corporation has completed its ongoing discussions with the MELCCFP concerning the management of the new park.

COMEX considers that condition 5 of the certificate of authorization has been met. The members of COMEX have no additional comments to make on this subject. However, COMEX is still waiting for follow-up on the camps affected by dust generated by the project and on the mitigation measures that will be implemented.

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

**b) 2024–2025 COMEX annual report**

A final version of the 2024–2025 COMEX annual report will be sent to COMEX members for review by August 8, 2025.

**c) Follow-up on COMEX’s invitation to the Provincial Administrator**

The Executive Secretary informed COMEX members that Frédéric Guay, Deputy Minister of the MELCCFP and Provincial Administrator of Section 22 of the JBNQA, has accepted the invitation to attend the in-person meeting scheduled for November 2025. She will prepare the agenda, which will be submitted for review at the next COMEX meeting.

**d) Projects on the agenda for the meetings scheduled for fall 2025**

- Eastmain and Rupert diversion hydroelectric project – Monitoring reports
- James Bay lithium mine project – Condition monitoring
- Whabouchi mining project – Condition monitoring
- Éléonore mining project – MODCA: Sand pit expansion
- Windfall mining project – Answers to QC02

**10) Next meetings**

The next meetings are scheduled for September 16, 2025, and October 21, 2025, by videoconference.

<b>Appendix A</b>					
<b>Follow-up correspondence from June 27, 2025, to July 29, 2025</b>					
<b>Project</b>	<b>From</b>	<b>To</b>	<b>Document</b>	<b>Date</b>	<b>Action – Comments</b>
Renard diamond project, Stornoway Diamonds (Canada) Inc. Ref.: 3214-14-041	Mélissa Gagnon MELCCFP	Raphaël Perreault and Patrick Sévigny Stornoway	Questions and comments – Renard mine operations status update	Sent June 26, 2025 Received COMEX June 27, 2025	<i>For information</i>
Retirement of Ms. Lizotte	Luc Lainé COMEX	Marie-Josée Lizotte Deputy Minister MELCCFP	Letter of congratulations	Sent June 30, 2025 Acknowledged June 30, 2025	
Route 167 extension to the Otish Mountains, MTMD Ref.: 3214-05-077	Sébastien Doire MTMD	Mélissa Gagnon MELCCFP	Monitoring of condition 24 of the certificate of authorization issued on December 1, 2011	Sent May 20, 2025	<i>For information</i>
	Mélissa Gagnon MELCCFP	Luc Lainé COMEX		Sent July 14, 2025 Received COMEX July 14, 2025	
Éléonore mining project, Dhilmar Éléonore Ref.: 3214-14-042	Geneviève Pépin Dhilmar Éléonore	Frédéric Guay Deputy Minister MELCCFP	Application to amend the certificate of authorization: Expansion of sand pit A-01	Sent July 4, 2025	<i>For recommendation</i>
	Mélissa Gagnon MELCCFP	Luc Lainé COMEX		Sent July 14, 2025 Received COMEX July 14, 2025	
Rose Lithium-Tantalum mining project, Critical Elements Lithium Corporation Ref.: 3214-14-053	Luc Lainé COMEX	Frédéric Guay Deputy Minister MELCCFP	Monitoring of conditions of the certificate of authorization – Condition 24: Emergency measures plan – Transmission of questions and comments	Sent July 16, 2025	<i>For information</i>
Letter to the Provincial Administrator	Luc Lainé COMEX	Frédéric Guay Deputy Minister MELCCFP	Congratulations and invitation to the 440 <sup>th</sup> COMEX meeting	Sent July 22, 2025 Acknowledged July 22, 2025	

**Appendix A**

**Follow-up correspondence from June 27, 2025, to July 29, 2025**

<b>Project</b>	<b>From</b>	<b>To</b>	<b>Document</b>	<b>Date</b>	<b>Action – Comments</b>
Letter to the new Grand Chief – Grand Council of the Crees and Cree Nation Government	Luc Lainé COMEX	Paul John Murdoch CNG	Congratulations on your recent election	Sent July 23, 2025	
James Bay lithium mine project, Galaxy Lithium Inc. Ref.: 3214-14-055	Mélissa Gagnon MELCCFP	Denis Couture Galaxy Lithium	Amendment to the certificate of authorization – Wording of condition 11	Sent July 23, 2025 Received COMEX July 28, 2025	<i>For information</i>