



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

<b>DATE:</b>	September 16, 2025
<b>PLACE:</b>	Videoconference (Teams)
<b>PRESENT:</b>	Daniel Berrouard, Québec Robert Joly, Québec Lucas Del Vecchio, CNG  Sophie Cooper, Executive Secretary
<b>ABSENT:</b>	Luc Lainé, Chairman Paul John Murdoch, Grand Chief, CNG

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

The agenda for the 438<sup>th</sup> meeting was adopted as presented.

**2) Adoption of the minutes of the 437<sup>th</sup> meeting**

Point 6b was clarified. After correction, the minutes of the 437<sup>th</sup> meeting were adopted.

**Action: Translate and file the 437<sup>th</sup> meeting minutes**

**3) Correspondence follow-up**

The follow-up correspondence from July 30, 2025, to September 16, 2025, is presented in Appendix A.

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

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

- a) Data sheets on landscape monitoring (2018) and rock paintings (2019)
  - For information

WHEREAS on August 25, 2022, the Review Committee (COMEX) received, for information, a technical memorandum on landscape monitoring (2018) and Lac Nemiscau rock paintings monitoring (2019) as part of the Eastmain-1-A and Rupert River diversion hydroelectric project. This monitoring was carried out by the proponent to meet the requirements of condition 6.37 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 aim of landscape monitoring is to assess the effects of reduced flow in the Rupert River on its environment. Campaigns were carried out in 2011 and 2015, and again in 2018 and 2019 after COMEX raised concerns about the high water levels observed in 2015. The sites studied include kilometre points (KP) 49, 54, 57 and 85 along the Rupert River.

The observations made in 2018 were used to update the previous data sheets. These were compared with data from 2011 and 2015, taking the reference state established prior to the diversion (2004) into account. The surveys were carried out by teams including photographers, anthropologists and Cree representatives.

**KP 49:** In 2018, the water level was higher than in 2011 but lower than in 2015. The shrubbery had grown since 2011, but several trees had died or been weakened since 2015. Contrary to the forecasts in the impact study, the riverbanks were flooded. The Cree perceived the vegetation as degraded and the rocky obstacles as dangerous.

**KP 54:** This site, which is influenced by KP 49, featured sparse aquatic vegetation and numerous dead trees. The herbs and shrubs showed better growth, but the tree vegetation was being impacted by the current. The water level appeared to be higher than expected, and the Cree considered the vegetation to be in poor condition.

**PK 57:** Many trees were dead or lying on the bank. The lack of shrubs and the tree mortality suggested that flooding was hindering plant regeneration.

**KP 85:** The water level in 2018 was slightly higher than in 2011. There were more dead or dying trees than in 2015. However, aquatic and herbaceous vegetation was showing signs of recovery. The regeneration of deciduous trees on the right bank indicated that reorganization of vegetation was beginning.

Monitoring shows that hydraulic facilities have had a significant impact on the landscape and vegetation. Extreme climatic conditions (rainfall and drought) are complicating plant growth. Climate change could also be playing a role.

The Lac Nemiscau rock paintings were visited twice in 2019 (May and September) at different water levels. By September, the water had returned to a level close to that observed prior to the hydraulic facilities. Although flooding episodes were observed before the project, they seem to be more frequent today. The rock paintings are becoming less visible, which may be due to natural processes. Their erasure seems slow, but inevitable.

WHEREAS COMEX will write to the Provincial Administrator to confirm it has read the technical note on the landscape monitoring and rock paintings and has no comments to make on the subject.

**#2025-0916-01:** *write to the Provincial Administrator informing him that the members of COMEX have reviewed the document submitted by the proponent and have no comments to make on the subject.*

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

- b) Environmental activity report – 2017  
➤ For information

WHEREAS on January 9, 2025, the Review Committee (COMEX) received, for information, the report on environmental activities conducted in 2017 in connection with the Eastmain-Sarcelle-Rupert Complex. Since 2007, an environmental activity report has been submitted. This report summarizes the main findings of the environmental and human monitoring studies carried out in 2017.

Environmental monitoring conducted as part of the operation of Bernard-Landry and Sarcelle powerhouses and the Rupert diversion is designed to assess how the facilities affect the natural environment (e.g., monitoring ice cover), wildlife (ex. (e.g., monitoring lake sturgeon spawning grounds) and humans (e.g., economic benefits). This monitoring makes it possible to verify the impact study forecasts and ensure resources are managed responsibly while integrating traditional Cree knowledge.

The proponent also pursued several mitigation and monitoring measures, including installing a footbridge on an island between KP 3.5 and KP 4.5 to allow foot traffic from one end of the island to the other, carrying out corrective work on the hydraulic structure at KP 170 of the Rupert River, and conducting environmental monitoring of the drinking water supply.

WHEREAS COMEX will write to the Provincial Administrator to confirm it has reviewed the document submitted by the proponent. As each round of monitoring was presented to COMEX individually, no additional comments are required. The file has been professionally produced, and traditional Cree knowledge has been taken into account in the production and analysis of numerous monitoring results.

However, this report concerns 2017 and was produced in 2024. It would have been more appropriate for the report to have been produced and provided closer to the year in question. It would also be helpful to produce such a report once all the monitoring has been completed.

**#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**

- 5) **Éléonore mining project, Dhilmar Éléonore**  
**Ref.: 3214-14-042**

- a) Application to amend the CA: Expansion of sand pit A-01  
➤ For recommendation

WHEREAS on April 16, 2025, the Review Committee (COMEX) received, for recommendation, an application to amend the certificate of authorization to expand sand pit A-01 in connection with the Éléonore mining project.

Sand pit A-01 is located approximately 1.5 km west of the mine tailings site (MTS) and 5 km west of the industrial sector of the mine site. Materials from this sand pit are mainly used to improve and build roads and infrastructure for the Éléonore mining project. An initial amendment to the certificate of authorization was issued on February 28, 2014, increasing the operating area of sand pit A-01 to 39.92 hectares. The current application is to extend this area by 14.45 hectares, for a total surface area of 54.37 hectares, given that the current area is reaching the end of its useful life.

WHEREAS the members of COMEX consider that the file is complete, that the proposed expansion will not have a significant impact on the receiving environment or on the communities concerned, and that mitigation measures have already been implemented by the proponent. COMEX therefore recommends authorizing the amendment to the certificate for the expansion of the A-01 sand pit, subject to the following conditions:

**Condition 1:**

In accordance with the first paragraph of section 15 of the *Regulation respecting sand pits and quarries* (RSQ), “A quarry or sand pit must be located at a minimum distance of 30 m from a lake, a steady-flow watercourse, a riparian shrub swamp of one of those environments or a marsh and 100 m from an open peatland situated south of the 50<sup>th</sup> parallel and 30 m from such a peatland situated north of the 50<sup>th</sup> parallel.”

The proponent indicates that the nearest open ombrotrophic peatland to sand pit A-01 is 25 m from the expanded operation area, which is less than the minimum prescribed distance of 30 m. It will therefore need to review this distance in accordance with the RSQ and present the updated information in the documents accompanying the application to amend the ministerial authorization under section 30 of the *Environment Quality Act* (EQA). This information should also be sent to the Provincial Administrator for information purposes.

**Condition 2:**

The proponent will have to comply with the deforestation restriction periods during the bird and bat breeding season, i.e., from May 1 to August 1, as indicated in the document provided. In addition to complying with condition 1 of the amendment to the overall certificate of authorization (February 28, 2014) concerning bald eagles and peregrine falcons, the proponent must ensure there are no bats in the specified areas containing potential bat habitat prior to any clearing.

Lastly, the proponent must obtain a forestry permit from the Harricana-Nord management unit to clear the logging area. It must also comply with the *Regulation respecting sand pits and quarries* (RSQ) and the *Regulation respecting the sustainable development of forests* (RSDF) at all stages of the project.

**#2025-0916-03:** *write to the Provincial Administrator informing him that the members of COMEX have reviewed the document submitted by the proponent and recommend that the amendment to the certificate to expand sand pit A-01 be authorized with conditions.*

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

**6) Rose Lithium-Tantalum mining project, Critical Elements Lithium Corporation**

**Ref.: 3214-14-053**

- a) Monitoring of conditions of the CA: Condition 22 – Availability of electric and hybrid mining equipment
  - For information

WHEREAS on January 18, 2024, the Review Committee (COMEX) received, for information, a progress report on the evolution and availability of electric and hybrid mining equipment, including an equipment conversion plan, for the Rose Lithium-Tantalum mine. This report was prepared by the proponent to meet the requirements of condition 22 of the certificate of authorization issued on October 31, 2022.

In this report, the proponent assesses the viability of the equipment for the project, from both a technical and economic point of view, and presents the potential reductions in greenhouse gas (GHG) emissions associated with its use. It indicates that, for the time being, many conversion options and the availability of electrical equipment remain inapplicable to the mine's planned operations. The analysis focuses mainly on loading and transportation equipment, which will be the most numerous and powerful items of equipment on the mine site and therefore produce the most GHGs. A status report is also provided for auxiliary equipment (other loading equipment, service equipment, transportation equipment and access platforms). The proponent plans to acquire them when the necessary equipment becomes available on the market, provided it has the financial capacity required for the additional investment.

WHEREAS the members of COMEX have reviewed the document submitted by the proponent. They consider that the proponent has adequately demonstrated the potential environmental and economic gains associated with the use of electrical equipment over the life of the mine.

WHEREAS, based on the information, COMEX concludes that the requirements of condition 22 of the certificate of authorization issued on October 31, 2022, have been met. However, given the time between when the report was produced (December 2023) and when ministerial authorization was issued for mine construction under section 22 of the *Environment Quality Act* (February 2025), an update on the current status of the electrical and hybrid equipment acquired appears necessary.

WHEREAS a letter requesting this update will be sent to the Provincial Administrator.

**#2025-0916-04:** *write to the Provincial Administrator informing him that the members of COMEX have reviewed the document submitted by the proponent and are requesting an update on the status of the electrical and hybrid equipment acquired since the report was written.*

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

## **7) Other business**

### **a) 2024–2025 COMEX annual report**

The 2024–2025 COMEX annual report was approved by the members present. Once approved by the Chair, it will be forwarded to the Provincial and Regional Administrator during the week of September 22, 2025.

**Action: Send the 2024–2025 COMEX annual report**

### **b) A look back at IAIA 2026**

COMEX’s proposal for a conference session at the IAIA Congress was rejected. The Executive Secretary will contact the Executive Director of the JBACE to find out who on the Advisory Committee was planning to attend.

### **c) Planning a meeting with the Provincial Administrator**

The Executive Secretary proposed an agenda for the meeting between COMEX members and Frédéric Guay, Deputy Minister of the MELCCFP and Provincial Administrator of Section 22 of the JBNQA, scheduled for November 2025. The agenda was revised and meeting dates will be suggested to the Deputy Minister.

### **d) Climate Plan – Invitation from FaunENord**

The Executive Secretary will contact FaunENord for information on the Climate Plan and specific expectations of COMEX in this context.

### **e) Projects on the agenda for meetings scheduled for fall 2025**

- James Bay lithium mine project – Condition monitoring
- Whabouchi mining project – Condition monitoring
- Windfall mining project – Answers to QC02
- Nemaska landfill project – Answers to QC01
- Forest roads H and I – MODCA

**8) Next meetings**

The next COMEX meeting is scheduled for October 21, 2025, by videoconference. A survey will be sent to members to decide on the date of the November 2025 COMEX meeting.

**Appendix A**  
**Follow-up correspondence from July 30, 2025, to September 16, 2025**

Project	From	To	Document	Date	Action – Comments
Whabouchi mine project, Nemaska Lithium Inc. Ref.: 3214-14-052	Denis Isabel Nemaska Lithium	Marie-Josée Lizotte Deputy Minister MELCCFP	Application to amend the certificate of authorization: Optimization of mining operations (MODCA13) – Transmission of additional information: Answers to questions and comments	Sent July 9, 2025	<i>For recommendation</i>
	Mélissa Gagnon MELCCFP	Luc Lainé COMEX		Sent July 29, 2025 Received COMEX August 4, 2025	
Whabouchi mine project, Nemaska Lithium Inc. Ref.: 3214-14-052	Denis Isabel Nemaska Lithium	Marie-Josée Lizotte Deputy Minister MELCCFP	Application to amend certificate of authorization – Spodumene concentrate transportation logistics (MODCA15)	Sent July 15, 2025	<i>For recommendation</i>
	Mélissa Gagnon MELCCFP	Luc Lainé COMEX		Sent July 29, 2025 Received COMEX August 4, 2025	
Windfall mining project, Windfall Mining Group Ref.: 3214-14-059	Andréanne Boisvert Windfall Mining Group	Marie-Josée Lizotte Deputy Minister MELCCFP	Environmental and social impact study – Transmission of additional information: Answers to 2 <sup>nd</sup> round of questions and comments	Sent July 25, 2025	<i>For recommendation</i>
	Mélissa Gagnon MELCCFP	Luc Lainé COMEX		Sent July 29, 2025 Received COMEX August 4, 2025	
Rose Lithium-Tantalum mining project, Critical Elements Lithium Corporation Ref.: 3214-14-053	Mélissa Gagnon MELCCFP	Nancy Duquet-Harvey CELC	Monitoring of conditions of the certificate of authorization – Condition 24: Emergency measures plan – Transmission of questions and comments	Sent July 29, 2025	<i>For information</i>
Project to dewater pits J-4 and 87 at the former Troilus mine site, Troilus Gold Corp Ref.: 3214-14-025	Luc Lainé COMEX	Frédéric Guay Deputy Minister MELCCFP	Monitoring report on pit dewatering activities – 2024 Transmission of questions and comments	Sent August 6, 2025	<i>For information</i>
James Bay lithium mine project, Galaxy Lithium Inc. Ref.: 3214-14-055	Luc Lainé COMEX	Frédéric Guay Deputy Minister MELCCFP	Monitoring of conditions of the certificate of authorization – Condition 24 - Transmission of questions and comments	Sent August 8, 2025	<i>For recommendation</i>
	Mélissa Gagnon MELCCFP	Denis Couture Galaxy Lithium		Sent August 26, 2025 Received COMEX August 27, 2025	

**Appendix A**  
**Follow-up correspondence from July 30, 2025, to September 16, 2025**

<b>Project</b>	<b>From</b>	<b>To</b>	<b>Document</b>	<b>Date</b>	<b>Action – Comments</b>
James Bay lithium mine project, Galaxy Lithium Inc. Ref.: 3214-14-055	Mélissa Gagnon MELCCFP	Denis Couture Galaxy Lithium	Monitoring of the conditions of the certificate of authorization – Condition 4: Environmental and social monitoring program – Transmission of questions and comments	Sent August 12, 2025	
Éléonore mining project, Dhilmar Éléonore Ref.: 3214-14-042	Marjorie Bujold Dhilmar Éléonore	Frédéric Guay Deputy Minister MELCCFP	Environmental and social monitoring report – 2024	Sent July 13, 2025	<i>For information</i>
	Mélissa Gagnon MELCCFP	Luc Lainé COMEX		Sent August 13, 2025 Received COMEX August 25, 2025	