



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
440TH MEETING OF THE REVIEW COMMITTEE
(Adopted)**

DATE:	November 12, 2025
PLACE:	Videoconference (Teams)
PRESENT:	Luc Lainé, Chairman Daniel Berrouard, Québec Robert Joly, Québec Lucas Del Vecchio, CNG Sophie Cooper, Executive Secretary
ABSENT:	Paul John Murdoch, Grand Chief, CNG

1) Meeting between COMEX and the Provincial Administrator

The members of COMEX met with the Provincial Administrator of Section 22 of the James Bay and Northern Quebec Agreement (JBNQA), Frédéric Guay, accompanied by Vanessa Chalifour, advisor on northern environmental protection regimes:

1. Introduction, Mandate and Mission of COMEX

The meeting began with a brief presentation of each member of COMEX and the Administrator, including a brief overview of their professional backgrounds. This introduction also reaffirmed COMEX's role and mission. Attention was paid to the fact that the JBNQA was one of the first agreements to introduce environmental assessment procedures in Quebec, and to marking the 50th anniversary of the Agreement.

Discussions focused on:

- The principles of the JBNQA, including protecting Indigenous rights, the environment, wildlife and ecosystems, and Cree participation in the protection regime.
- COMEX's operating model, using consensus-based decision-making.
- Respective responsibilities:
 - Government of Quebec: compensating its designated members, covering operating and public hearing costs, sending documents quickly, approving or rejecting projects.
 - COMEX: analyzing projects and recommendations, organizing public hearings as required, publishing information and monitoring authorized projects.

The meeting confirmed the parties' commitment to maintaining a thorough and transparent process that respects the rights and principles established by the JBNQA.

2. Discussion points presented in COMEX's 2025–2025 Annual Report

a) Bill – Optimization of the environmental assessment procedure (EIARP)

COMEX emphasized that the overhaul of the EIARP is an important step in modernizing southern Quebec's environmental framework and understands that the aim of this bill is to make the procedure more efficient, transparent and focused on priority issues. However, COMEX clarified that this bill does not apply to environmental assessment regimes for projects governed by the JBNQA. COMEX questioned the way in which this information was communicated to proponents and senior Quebec government officials. Another question that was raised: how can optimizing the EIARP help reduce proponents' reluctance to submit complete impact studies, or convince them to provide adequate and thoughtful responses to the questions and comments submitted to them?

COMEX noted that, in practice, proponents often provide incomplete information when submitting impact studies and additional information. This situation means that COMEX must send multiple rounds of questions and comments to the Administrator, who then forwards them to the proponent, to obtain the information needed to analyze the project.

In the past, COMEX has expressed the wish that proponents be better informed about the environmental and social impact assessment and review procedure set out in Section 22 of the JBNQA, particularly regarding the importance of submitting a complete impact study.

The Administrator assured COMEX members that senior officials, proponents and all stakeholders have been clearly informed that the revised EIARP only applies to southern Quebec. He pointed out that the Direction générale de l'évaluation environnementale et stratégique (DGÉES) is working on measures to make proponents aware of the steps involved in the procedure. Mechanisms will also be put in place to stop the analysis process if a project is insufficiently defined or if the proponent refuses to answer questions. More detailed information on the overhaul of the EIARP will be presented by Mélissa Gagnon.

The Administrator asked whether COMEX would be interested in following the southern procedure more closely. COMEX responded that its main role is to ensure that the JBNQA's guiding principles are applied when analyzing projects. However, COMEX recognizes that as an evolving agreement, the JBNQA offers a degree of flexibility to incorporate certain aspects of the southern environmental impact evaluation procedure.

b) Cumulative impact of transportation

COMEX informed the Administrator that the cumulative impact of transportation in the Eeyou Istchee James Bay region is still a major concern for COMEX. This topic is regularly raised as a key concern by Cree communities during public consultations. These communities have mainly highlighted safety issues and perceived risks associated with transporting products from mines. In addition to this safety issue, there are issues regarding nuisances, dust on unpaved roads, noise, air quality deterioration and premature deterioration of road infrastructure.

Several issues remain concerning the management and maintenance of the Billy-Diamond Highway, including its load-bearing capacity, monitoring, applicable regulations and coordination between the various authorities that oversee it. COMEX did note, however, that some proponents have initiated discussions with the James Bay Development Corporation (JBDC) on road safety and maintenance and have even signed management agreements with this organization.

COMEX expressed the hope that the Quebec government would set up a regional coordination mechanism involving the MELCCFP, MRNF, JBDC and EIJBGR, while drawing on the MTMD's expertise.

In response, the Administrator acknowledged the relevance of the concerns raised and agreed that dialogue between the various stakeholders would benefit from further improvement. He suggested that the MELCCFP consider setting up a committee composed of the ministries and organizations concerned or setting up a fund to which proponents would be required to contribute. COMEX will be kept informed of progress and consulted when necessary.

c) Planning energy requirements

COMEX pointed out a worrying trend observed in recently submitted mining projects: insufficient energy requirement planning in the earliest design stages, often with the aim of reducing analysis times. Once the project has been authorized, this approach means that the proponent must apply to amend the certificate of authorization to meet its energy needs by adding fossil fuels.

The Administrator asked whether it would be possible to strengthen the section on energy requirements in the impact study guidelines issued by COMEV. COMEV members Daniel Berrouard and Lucas Del Vecchio confirmed that this option could be considered with the support of MELCCFP analysts and the Cree Nation Government.

3. COMEX public consultations

As part of its mandate, COMEX may be called upon to organize public hearings. This responsibility involves the executive secretary booking rooms, hiring caterers and audiovisual firms, and arranging translation services. Often, there is only one supplier who can meet these needs. These steps can involve numerous exchanges with different MELCCFP stakeholders, which can slow down or complicate the process. COMEX would like the MELCCFP to be more flexible when organizing these types of events, particularly when it comes to the administrative rules governing the choice of suppliers.

The Administrator indicated that he would authorize any waivers required to facilitate the organization of the next public consultation, which will be held in Waswanipi and Lebel-sur-Quévillon for the Windfall mining project. The COMEX secretariat will follow up on this matter.

4. COMEX visibility

COMEX informed the Administrator that its members wish to participate in the IAIA Conference, which will be held in the city of Québec in May 2026. COMEX also expressed interest in organizing field trips to Eeyou Istchee James Bay.

In response, the Administrator confirmed his support for COMEX's participation in the IAIA Conference. However, given the government's budget constraints, it will not be able to authorize a field trip.

2) Overhauling the environmental impact assessment and review procedure – southern Quebec

Meeting with Méli^sa Gagnon, Deputy Director General – Environmental and Strategic Assessment: Northern Environment and Strategic Mandates, accompanied by Maud Ablain, Director, Environmental Assessment of Industrial and Mining Projects (DGÉES).

The EIARP aims to assess the environmental and social impact of major projects (industrial, mining, energy, transportation, etc.) in advance to support sustainable development decisions. It is being optimized to improve efficiency and transparency and focus on priority issues. Ms. Gagnon presented the main changes:

Intervention prior to the impact study

- The notice of intent (formerly known as “preliminary information”) must include the objectives, methodology, scope of the study and issues to be addressed.
- Objectives: to clarify expectations, target key issues, and encourage the submission of better-prepared studies.

A stronger role for the BAPE from the outset

- The Bureau d'audiences publiques sur l'environnement will be responsible for consulting the public as soon as the notice of intent is issued.
- The BAPE will formulate an opinion on the relevance of organizing public consultations or mediations.

Customized guidelines and eligibility validation

- An appropriate guideline will be drawn up in consultation with proponents, Indigenous communities and government experts.
- Introduction of a certificate of eligibility issued rapidly with the proponent's attestation, which will replace the admissibility stage.

Single assessment

- End of the distinction between the “admissibility” and “analysis” phases.
- The entire analysis will be carried out without interruption, starting as soon as the study is submitted.

Ms. Gagnon concluded the presentation by pointing out that meetings with proponents will systematically be held in advance and that warnings will be sent to them. It will also be suggested that DGÉES project managers and experts systematically hold preparatory meetings with proponents to explain the environmental assessment procedure in greater detail.

Ms. Ablain informed COMEX that provisional schedules would be drawn up for presentation to the proponents. She asked whether COMEX wished to be consulted as part of this process for northern projects. The members expressed their agreement, since this initiative would make it easier to understand the steps involved and expected deadlines.

An additional meeting with Ms. Gagnon will be organized to present the proposed modifications to the sectoral or regional environmental assessment. The COMEX secretariat will be contacted to plan this meeting.

3) Call to order and adoption of the agenda

The agenda for the 440th meeting was adopted as presented.

4) Adoption of the minutes of the 439th meeting

The minutes of the 439th meeting were adopted as presented.

Action: Translate and file the 439th meeting minutes

5) Correspondence follow-up

The follow-up correspondence from October 22, 2025, to November 12, 2025, is presented in Appendix A.

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

Ref.: 3214-14-055

- a) Monitoring of condition 8 – Watertightness of geomembrane installed under haul roads (for discussion)
 - For recommendation

At the meeting on May 27, 2025, it was agreed that COMEX would recommend conditional authorization for the geomembrane watertightness monitoring program and the construction of haul roads. However, COMEX was waiting for clarification on the timing of the monitoring and additional analyses provided for in condition 1 of the recommendation.

The executive secretary presented members with a draft letter incorporating the requested clarifications. COMEX suggested several corrections. The letter will be revised accordingly and sent to members after the meeting for final approval.

**Action: Correct the letter and send it to the Provincial Administrator
Send a recommendation**

7) Windfall mining project, Windfall Mining Group

Ref.: 3214-14-059

- a) Environmental and social impact study
- b) Additional information (Answers to questions and comments – QC01)
- c) Additional information (Answers to questions and comments – QC02)
- d) Additional information (pending)
- e) Discussion – Public hearings
 - For recommendation

WHEREAS, pending the proponent's answers to the additional questions, COMEX has decided to begin preparations for public hearings in Waswanipi. Lucas Del Vecchio informed members that the Waswanipi community has expressed a preference for the beginning of February 2026. A letter will be sent to the Chief of the Cree First Nation of Waswanipi to inform her that the members of COMEX would like to know the proposed date for the public hearings.

#2025-1112-01: *write to the Chief of the Cree First Nation of Waswanipi to inform her that COMEX members would like to know the proposed date for public hearings relating to the Windfall mining project.*

Action: **Send a letter to Chief Irene Neeposh**
 Send a request for information

8) Other business

- a) **Projects on the agenda for meetings scheduled for winter 2026**
 - James Bay lithium mine project – Condition monitoring
 - Whabouchi mining project – Condition monitoring
 - Forest roads H and I – Amendment to the certificate of authorization

9) Next meeting

The next COMEX meeting is scheduled for December 2, 2025, by videoconference.

Appendix A
Follow-up correspondence from October 22, 2025, to November 12, 2025

Project	From	To	Document	Date	Action – Comments
Éléonore mining project, Dhilmar Éléonore Ref.: 3214-14-042	Luc Lainé COMEX	Frédéric Guay Deputy Minister MELCCFP	Application to amend the certificate of authorization: Expansion of sand pit A-01 – Transmission of a recommendation	Sent October 22, 2025	<i>For recommendation</i>
Rose Lithium-Tantalum mining project, Critical Elements Lithium Corporation Ref.: 3214-14-053	Luc Lainé COMEX	Frédéric Guay Deputy Minister MELCCFP	Condition monitoring for the certificate of authorization – Condition 22: Availability of electric and hybrid mining equipment – Transmission of a comment	Sent October 22, 2025	<i>For information</i>
	Mélissa Gagnon MELCCFP	Nancy Duquet-Harvey CELC		Sent November 3, 2025 Received COMEX November 4, 2025	
James Bay lithium mine project, Galaxy Lithium Ref.: 3214-14-055	Luc Lainé COMEX	Frédéric Guay Deputy Minister MELCCFP	Application to amend the certificate of authorization: Heating strategy – Transmission of questions and comments	Sent October 24, 2025	<i>For recommendation</i>
	Mélissa Gagnon MELCCFP	Denis Couture Galaxy Lithium		Sent November 3, 2025 Received COMEX November 4, 2025	
New trench landfill project in Nemaska, Cree Nation of Nemaska Ref.: 3214-16-079	Luc Lainé COMEX	Frédéric Guay Deputy Minister MELCCFP	Environmental and social impact study – Transmission of a recommendation	Sent October 31, 2025	<i>For recommendation</i>
Eastmain-1-A and Rupert diversion hydroelectric project, Hydro-Québec Ref.: 3214-10-017	Mélissa Gagnon MELCCFP	Marie-Josée Grimard Hydro-Québec	Condition monitoring for the certificate of authorization	Sent October 27, 2025 Received COMEX October 31, 2025	<i>For information</i>

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Project	From	To	Document	Date	Action – Comments
Windfall mining project, Windfall Mining Group Ref.: 3214-14-059	Andréanne Boisvert Windfall Mining Group	Frédéric Guay Deputy Minister MELCCFP	Additional information: Minutes and notes from meetings with tallymen – May 8, 2025	Sent September 25, 2025	<i>For recommendation</i>
	Mélissa Gagnon MELCCFP	Luc Lainé COMEX		Sent October 27, 2025 Received COMEX October 31, 2025	
Windfall mining project, Windfall Mining Group Ref.: 3214-14-059	Luc Lainé COMEX	Frédéric Guay Deputy Minister MELCCFP	Request for additional information	Sent November 4, 2025	<i>For recommendation</i>