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(ADOPTED)

DATE:	April 19, 2017
PLACE:	COMEX Office 201 President Kennedy Ave. – Office PK-2840 Montréal (Québec) H2X 3Y7
PRESENT:	Suzann Méthot, Chairman, Québec Daniel Berrouard, Québec Brian Craik, CNG (by phone) Robert Joly, Québec
ABSENT:	John Paul Murdoch, CNG

1) CALL TO ORDER AND THE ADOPTION OF THE AGENDA

As John Paul Murdoch was absent and the other member from the CNG was only able to participate by phone, it added a level of difficulty to the meeting and so it was agreed to shorten the agenda and limit discussion only to those files that required immediate follow-up. The items below were removed from the agenda and will either be addressed in conference call or by email, or postponed until the next meeting:

- The 2016-2017 Strategic Plan – Assessment and forecasts for 2018
- Correspondence
- Varia

2) ADOPTION OF THE MINUTES OF THE 351ST MEETING

The minutes of the 351st meeting were adopted as written.

Action: Translate and file CR 351.

3) Meeting 352 A:

- a. **Project to mine and process 900,000 tonnes of gold ore from the Bachelor lake property, metanor ressources inc. – Mining and processing of 600,000 additional tonnes of ore, Ref. No: 3214-14-027 : Follow-up on Condition 3, lowering of water level**

WHEREAS on March 24, 2017 the COMEX received for information a technical note supplied by the proponent regarding Condition 3 of the project;

WHEREAS on the same date, the COMEX held an ad hoc conference meeting with the proponent to discuss Condition 3 due to concerns and delays with respect to the conditions imposed on the proponent;

WHEREAS the proponent was not able to meeting Condition 3 to lower the water level in its tailings pond to 328.2 meters elevation;

WHEREAS the COMEX is not satisfied with this response because no explanation was given as to why it was not possible to lower the water level, and because the technical note does not mention any efforts made by the proponent to correct the situation, and finally because the new calculations presented are not reassuring;

WHEREAS the COMEX has been informed of actions taken by the Centre de contrôle environnemental du Québec (CCEQ) instructing the proponent to fulfill its obligations.

ACCORDINGLY, the members of the COMEX agreed:

#2017-0324-01: *to send a letter to the Provincial Administrator stating that COMEX considers that the best way to ensure that the proponent takes appropriate action to correct the situation is to rely on the CCEQ. The COMEX will monitor the situation closely via the analyst of northern and mining projects at the MDDELCC and the regional directorate for Abitibi-Témiscamingue and Northern Quebec.*

The COMEX would like the proponent to keep the committee informed on the measures taken to meet Condition 3 in the certificate of authorization.

Action: Send letter to Provincial Administrator.

4) Project to mine and process 900,000 tonnes of gold ore from the Bachelor lake property, metanor ressources inc. – Mining and processing of 600,000 additional tonnes of ore, Ref. No: 3214-14-027

a. Follow-up on Condition #3, lowering of the water level

WHEREAS the proponent still has not been able to meet Condition 3, to lower the water level in the tailings pond to 328.2 meters elevation.

WHEREAS on March 27, the COMEX sent a letter to the Administrator recommending to rely for now on the procedure initiated by the CCEQ, and continue to stay informed on the proponent's efforts to correct the situation and that no communication from the proponent to the Administrator on this issue was send;

WHEREAS since then, the COMEX has been told by the MDDELCC employee in charge of following up on this file with the proponent that the Regional Directorate of the Centre de contrôle environnemental for Abitibi-Témiscamingue and Northern Quebec had sent the proponent a letter instructing it to react quickly, i.e., within two weeks of the letter from the CCEQ dated March 28, 2017, in order to avoid being in non-compliance under Section 123.1 of the EQA, and the proponent has not followed up on that letter within the prescribed time limit;

WHEREAS the COMEX was informed a day before this meeting that an action plan had finally been submitted to the Administrator that same day, and was undergoing analysis;

WHEREAS the COMEX is also concerned about the fact that the cyanide treatment system is not operating, there is no timetable to correct the situation and total residual cyanide (CNT) concentrations are currently above the discharge standards prescribed in the attestation of decontamination.

ACCORDINGLY, the members of the COMEX are still waiting for the action plan as well as the follow-up that was to be carried out by the CCEQ.

b. Tailings Management Plan (Condition #2)

WHEREAS on March 9, 2017, received the tailings management plan to meet Condition 2 for the Bachelor Mine site, for its recommendation to the Administrator;

WHEREAS there is a possibility that future tailings could potentially be acid generating given that the geochemical characterization of the tailings facility is still incomplete and although these results will be submitted by the proponent as soon as they are available, this process may take more than one year;

WHEREAS as a precautionary measure, the proponent has proposed using the liming plant already on-site to treat the tailings water in the event that the pH no longer meets environmental requirements but the proponent has still not reported on whether this approach is functioning properly.

WHEREAS the management plan as a whole provides for adequate mitigation measures to handle the possible risks related to the tailings geochemistry and to wind and water erosion.

ACCORDINGLY, the members of the COMEX agreed:

#2017-0419-01: *to send a letter to the Provincial Administrator informing her that the members of the COMEX have studied the revised tailings management plan and that it meets Condition 2 in the amendment to the certificate of authorization issued February 10, 2017. However, the COMEX expects to receive the other requirements contained in Conditions 1 and 6 within the prescribed three-month timeframe following the issuance of the amendment to the CA.*

Action: Send letter to Provincial Administrator.

5) Forest Access Roads H Section West, and I – Reference No.: 3214-05-075 by Matériaux Blanchet

a. Monitoring report on the conditions in the CA – (received February 15, 2017)

- *For information (Conditions 1, 2, and 7)*

WHEREAS the COMEX received for information a follow-up on Conditions 1, 2 and 7;

WHEREAS the COMEX has taken note of the follow-up on Conditions 1 and 2, and would like to be kept informed of any changes to the route of the road and the related consequences to the possible presence of bald-headed eagles nests, as stipulated in Condition 7 of the CA;

- *For approval, Study of archaeological potential (Condition 8)*

WHEREAS the COMEX received for its approval the Study of archaeological potential as required under Condition 8 of the certificate of authorization;

WHEREAS the COMEX considers that the methodology of this study is deficient in terms of the sample size of users who were consulted, as it involved only one individual, which cannot be considered representative of all territorial users who possess the appropriate knowledge to complete a study of the archaeological potential;

WHEREAS the COMEX is still waiting for the pre-construction requirements for roads H & I as outlined in Condition 3 (woodland caribou monitoring measures), Condition 4 (program for the characterization of the natural environment) Condition 5 (work related to stream crossing and borrow pit operations), and Condition 6 (protection measures for the possible presence of threatened and vulnerable species);

WHEREAS the COMEX questions the lack of minutes for meetings between the monitoring committee and the community, which the proponent was supposed to hold according to Condition 9;

ACCORDINGLY, the members of the COMEX decided:

#2017-0419-02: *to send a letter to the Provincial Administrator advising that the COMEX members have reviewed the proponent's efforts in response to Conditions 1, 2, 7 and 8. The COMEX has also taken note of the follow-up to Conditions 1 and 2 and wishes to be kept informed of any changes to the route and the consequences for the possible presence of bald-headed eagle's nests, as stipulated in Condition 7 of the certificate of authorization.*

As for the study of archaeological potential required under Condition 8, the COMEX reviewed the document and find it inadequate. Although the COMEX recognizes that the interviewer encountered difficulties, it considers that this study of archaeological potential has methodological deficiencies related to sample size, which was limited to a single individual, and therefore considered unrepresentative of all the users of the territory who possess the relevant knowledge for the study. The COMEX therefore recommends that the proponent complete this study and contact the Band Council of Waswanipi to obtain better collaboration with territorial users and those with traditional knowledge of the area..

In addition, the COMEX members are still awaiting the pre-construction requirements for the roads H & I mentioned in conditions 3 (woodland caribou monitoring measures), 4 (environmental characterization program), 5 (work related to stream crossings and operation of borrow pits), and 6 (protection measures for the presence of threatened or vulnerable wildlife species).

Finally, the COMEX wonders why there are minutes documenting meetings between the monitoring committee and the community as required under Condition 9, and would like to have an update without delay on the status of discussions between the proponent and the community of Waswanipi in anticipation of work on roads H Section West & I.

Action: Send letter to Provincial Administrator.

6) Road L-209 Nord extension Ref. No: 3214-05-072 & Construction of Road E West Ref. No: 3214-05-074 – by Barrette Chapais

- a. Follow-up on COMEX questions and schedules sent to the Administrator regarding L-209 on July 27, 2016 and E-West on November 23, 2015

WHEREAS the COMEX the Administrator a series of questions and comments for the proponent in connection to the extension of road L-209 Nord on July 27, 2016 and on the construction of forest road E West on November 23, 2015.

WHEREAS the COMEX has not received any response to these questions.

ACCORDINGLY, the members of the COMEX agreed:

#2017-0419-03: *to send a letter to the Provincial Administrator to mention that the members would like an update from the proponent on the timetable for the planned work as well as a response to their questions and comments regarding the extension of forest road L-209 Nord and the construction du forest road E West. The COMEX would like to know how these roads fit in to the current and future integrated forest management plan (PAFIT).*

Action: Send a letter to the Provincial Administrator.

7) Eastmain-1A and Rupert Diversion Project, Hydro-Québec – Ref. No: 3214-10-017

- a. Application for amendment: construction of a rockfill spur dike and stabilization of a bank slope near the weir at PK-170 of the Rupert River

WHEREAS on March 29 the COMEX received a request for an amendment to the certificate of authorization for the construction of a rockfill spur dike and stabilization of the a bank slope near the weir at PK-170 on the Rupert River;

WHEREAS the COMEX also received additional information the proponent sent to the Administrator on April 18, as well as recent photos of weir PK-170 supplied by the proponent in response to a request from the COMEX and forwarded to the MDDELCC analyst on April 4, 2017.

ACCORDINGLY, the members of the COMEX agreed:

#2017-0419-04 : *to send the Administrator a recommendation in favour of the request to amend the certificate of authorization so as to construct a rockfill spur dike and stabilize the bank slope near the weir at PK-170, on the following conditions:*

- *The proponent must maintain the mechanisms for the exchange of information that were established with the Cree during the construction of the Eastmain 1A and Rupert diversion project in the construction of PK-170 phase, and provide a report to this effect when the work is complete.*
- *The proponent must extend the monitoring of the natural spawning grounds located downstream from PK-170 until 2020.*

Action: Send letter to Provincial Administrator.

8) TROILUS MINE PROJECT BY FIRST QUANTUM MINERALS LTD. REF. NO: 3214-14-025

- a) 2015 Post-closure environmental monitoring and inspection report
 - For information

WHEREAS the COMEX followed up as agreed upon at the 351st COMEX meeting and that prior to this meeting and without further formalities it sent a letter to the Provincial Administrator seeking additional information.

ACCORDINGLY:

#2017-0419-05: *Following up on the 351st COMEX meeting and for the purpose of additional verification, on April 12, 2017, the COMEX sent a letter to the Administrator seeking the studies mentioned in Paragraph 6.2 of the 2015 Annual Report from the Troilus mine, specifically, the kinetic assays of airborne particles.*

9) Whabouchi project by Nemaska Lithium, Ref. No: 3214-14-052

- b) Plan to operate three borrow pits (BB-05, BB-06, BB-07)
 - Application to amend the CA, for recommendation

WHEREAS on March 8 the COMEX received an application to amend the certificate of authorization for the Whabouchi mine project so as to operate three borrow pits (BB-05, BB-06 and BB-07).

WHEREAS the COMEX checked with project stakeholders in the community of Nemaska to determine the social acceptability of the project.

WHEREAS the COMEX is satisfied overall with the information provided in support of the application to amend the CA.

ACCORDINGLY, the members of the COMEX agreed:

#2017-0419-06: *to recommend to the Provincial Administrator to approve the application to amend the CA on the following conditions:*

- *Before beginning operations at borrow pits BB-05, BB-06, and BB-07, the proponent must send the Provincial Administrator a status report on past and upcoming discussions between the proponent and concerned territorial users on the topic of the start date and type of work.*

Action: Send letter to Provincial Administrator.

10) Coming meetings

a. May 18, Montréal

b. June 21-22-23, Nemaska – given the program planned, it was agreed that the Nemaska visit would be extended

1. Meeting with Band Council
2. Éléonore mine visit
3. Visit to PK 170 – meeting between COMEX and HQ (contact H-Q for help with arrangements)
4. Visit to Whabouchi

Suzann Méthot will perform the necessary follow-up to prepare for the Nemaska visit. The dates have been changed to accommodate the meeting of the Rupert River management board which Brian Craik is attending on June 20.

c. June 19, Quebec City