



$b \cdot \nabla f \cdot \Delta U_d$ C^{∞} L^q

$a_0 b^{L_j} C^j d^j$

$\triangleleft i j$

A wooden boardwalk made of dark grey planks leads from the bottom left towards the center of the frame. To the right of the boardwalk is a sandy area with patches of low-lying green and yellowish vegetation. Further right is a body of water, possibly a lake or a wide river, with reeds and grasses growing along its edge. The background shows a flat horizon line with some distant trees and hills under a clear blue sky with a few wispy clouds. The overall scene is a coastal or wetland landscape.

July 28, 2023

Front page: Champion Lake, Nemaska, Québec

Last page : Eastmain, Québec

Marie-Josée Lizotte

Deputy Minister and Provincial Administrator for Section 22
of the James Bay and Northern Québec Agreement

Ministère l'Environnement, de la Lutte contre les changements climatiques,
de la Faune et des Parcs

Isaac Voyageur

Regional Administrator for Section 22
of the James Bay and Northern Québec Agreement

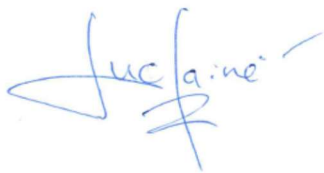
Cree Nation Government

Dear Madam, Dear Sir:

On behalf of myself and the members of the Environmental and Social Impact Review Committee (COMEX), I am pleased to send you the report of activities for the year ended March 31, 2023.

COMEX gradually returned to its normal pre-COVID operations in 2022-2023, holding two monthly meetings and one public hearing in person.

Yours truly,



Luc Lainé

Chairman
Environmental and Social Impact Review Committee

Message from the Chairman

The 15th Conference of the Parties (COP15) on Biological Diversity was held in Montréal in December 2022. As safeguarding nature and halting biodiversity loss are key issues in our own work, COMEX was interested in the discussions dealing with novel approaches to wetland conservation and best practices for addressing climate change.

On March 29, 2023, the COMEX members met with Marie-Josée Lizotte to discuss ways to improve efficiency in COMEX's operations and familiarize her to recurring issues of concern in the territory of Eeyou Istchee James Bay, in particular the cumulative impacts of road transportation and compensation for wetland loss. The Deputy Minister informed the COMEX members that she is aware of these issues and that the MELCCFP is looking at various ways to better equip our committee. These issues are discussed at greater length in the annual report.

COMEX held monthly meetings and issued several recommendations to the Provincial Administrator throughout this past year. The committee also held in-person public hearings in the First Nation community of Eastmain and the city of Matagami for the Allkem/Galaxy Lithium Inc.'s James Bay Lithium Mine Project. COMEX's participation and presence in these communities were greatly appreciated and demonstrated the relevance of listening to the people affected by a project and soliciting their opinions.

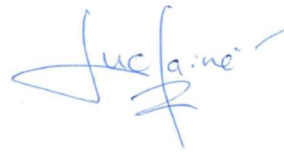
I invite everyone who is interested to visit COMEX's website at comexqc.ca. It contains a wealth of information about our activities, the minutes of our meetings, the recommendations made by COMEX, and much more.

In 2022-2023, we had the pleasure of welcoming a new member to COMEX, Lucas Del Vecchio, who was appointed by the Cree Nation Government (CNG). Lucas has years of experience working at the GNC as Manager of Natural Resources and Sectoral Development and was keen to fill Brian Craik's moccasins. We wish Brian good health in his well-earned retirement.

The CNG also welcomed Graeme Morin into the fold as its new Environmental and Social Assessment Coordinator. Graeme left his position at the James Bay Advisory Committee on the Environment (JBACE) to replace Kelly Leblanc, who accepted a new challenge in the private sector.

In closing, I want to thank my fellow members Daniel Berrouard and Robert Joly, appointed by the Gouvernement du Québec, and John Paul Murdoch and Lucas Del Vecchio, appointed by the Cree Nation Government, as well as our executive secretary, Sophie Cooper, PhD (Water Science). Also, I would be remiss not to stress the excellent work and professionalism of the Québec and Cree Nation government analysts for their contribution to our collective reflection and help in making informed recommendations.

O nenh



Luc Lainé

Chairman

Environmental and Social Impact
Review Committee

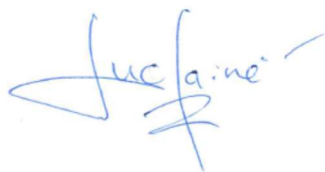
Chairman's Statement

To the best of my knowledge, the annual report 2022-2023:

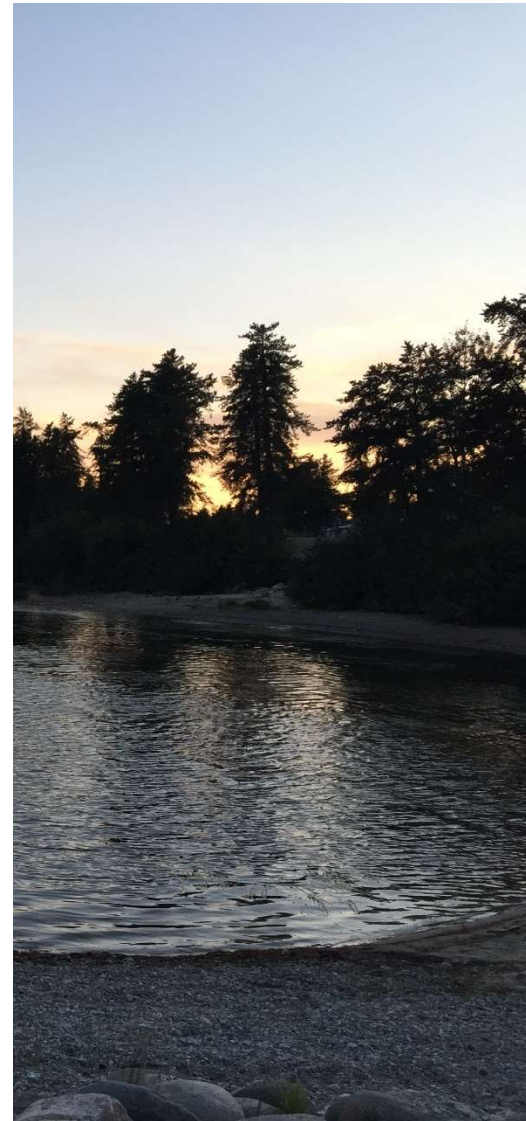
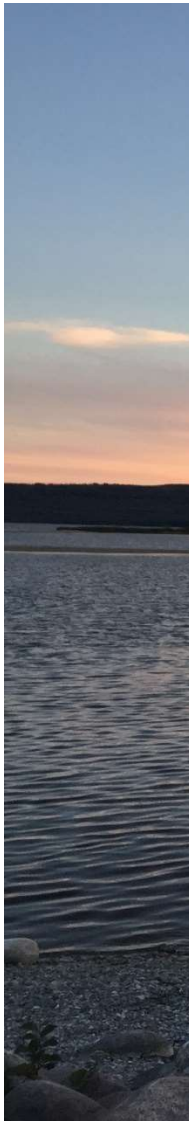
- accurately describes the Review Committee's mission, areas of activity, strategic directions and priorities;
- provides accurate and reliable data covering all Review Committee's activities and indicates the degree of achievement of its goals.

In accordance with its mandate, the Review Committee maintained a system for sharing information with the MELCCFP throughout the fiscal year to ensure sound management of its operations and accountability for the undertakings ensuing from its strategic directions and its goals for 2022-2023.

I am satisfied with the practices and methods used to produce the information contained in this annual report of activities.



Luc Lainé
Chairman
Environmental and Social Impact
Review Committee



List of Acronyms

CA	Certificate of authorization
CNG	Cree Nation Government
COFEX-South	Federal Review Panel – South
COMEX	Environmental and Social Impact Review Committee
COP15	15th Conference of the Parties on Biological Diversity
EQA	<i>Environment Quality Act</i>
JBACE	James Bay Advisory Committee on the Environment
JBNQA	James Bay and Northern Québec Agreement
KWREC	Kuujuaraapik-Whapmagoostui Renewable Energy Corporation
MELCCFP	Ministère de l'Environnement, de la Lutte contre les changements climatiques, de la Faune et des Parcs
RCEWBW	<i>Regulation respecting compensation for adverse effects on wetlands and bodies of water</i>

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About the Review Committee

Mission

The Environmental and Social Impact Review Committee (Review Committee – COMEX) is an independent body reporting to the Minister of the Environment, the Fight Against Climate Change, Wildlife and Parks (MELCCFP). Its mission is to contribute to the protection of human health and the environment and to the economic and social well-being of the peoples inhabiting the territory south of the 55th parallel governed by the James Bay and Northern Québec Agreement (JBNQA).

Mandate

The Review Committee was established by Section 22 of the JBNQA and Title II of the *Environment Quality Act* (EQA). Its mandate is to review development projects submitted to the environmental and social impact assessment and review procedure and recommend to the Provincial Administrator or the Cree Regional Administrator whether or not the project should be authorized and under what conditions. Where necessary, the Review Committee stipulates the appropriate preventive or remedial measures.

Accordingly, COMEX examines every project subject to the environmental and social impact assessment and review procedure, using the relevant expertise of the Québec and Cree Nation governments where necessary. The participation of affected communities, as well as other interested individuals and groups, plays an important role in COMEX's approach, allowing the Review Committee to identify the concerns of people living in the territory and, in particular, take into account the traditional knowledge held by Indigenous communities.

In keeping with its mandate, the Review Committee gives due consideration to the following guiding principles set out in paragraph 22.2.4 of the JBNQA:

- ⊕ the protection of Cree hunting, fishing and trapping rights in the territory;
- ⊕ the environmental and social protection regime;
- ⊕ the protection of the Cree people, societies, communities and economies;
- ⊕ the protection of wildlife resources, the physical and biological environments and ecological systems;
- ⊕ the rights and guarantees of the Cree people within Category II lands;
- ⊕ the involvement of the Cree people in the application of the environmental and social protection regime;
- ⊕ the rights and interests of non-Indigenous people, whatever they may be;
- ⊕ the right to develop by persons acting lawfully in the territory;
- ⊕ the minimizing of negative environmental and social impacts of development on the Cree people and communities by reasonable means with special reference to those measures proposed or recommended by the impact assessment and review procedure.

The Review Committee's mandate covers the territory south of the 55th parallel of latitude and west of the 69th meridian of longitude, as defined in Section 22 of the JBNQA, and including the Category I and II lands of Whapmagoostui, a Cree community just north of the 55th parallel. The land regime established by the JBNQA divides the lands into three categories. Category I lands are reserved for the exclusive use of the Crees and include the lands located in and around their communities. Category II lands are public lands where the Crees have exclusive hunting, fishing and trapping rights. Category III lands are public lands where the Crees have the right to hunt, fish and trap at any time without a licence or permit and without a bag or catch limit, subject to the principle of conservation.



Composition of the Review Committee

The Review Committee and its composition were established by paragraphs 22.6.1 and 22.6.2 of the JBNQA.

22.6.1 An Environmental and Social Impact Review Committee (hereinafter referred to as “the Review Committee”) is established which shall be the review body respecting development projects in the Territory involving provincial jurisdiction.

22.6.2 The Review Committee shall have five (5) members. Quebec shall appoint three (3) members and the Cree Regional Authority [now the Cree Nation Government] shall appoint two (2) members. The Chairman shall be appointed by the Lieutenant-Governor in Council from among the members appointed by the Provincial Government. The remuneration of a member and his expenses shall be paid for by the body that appoints such a member. However, the expenses of the Cree representatives shall be part of the costs of the secretariat.

The members of COMEX in 2022-2023 were:

Members appointed by the Gouvernement du Québec

Luc Lainé, Chairman
Daniel Berrouard
Robert Joly

Members appointed by the Cree Nation Government

John Paul Murdoch
Lucas Del Vecchio



Luc Lainé



Daniel Berrouard



Robert Joly



John Paul
Murdoch



Lucas Del Vecchio

Code of ethics and professional conduct

COMEX is a public body. As such, its members are deemed to be public office holders within the meaning of the *Public Administration Act*. In the performance of their duties, members are required to respect the ethical principles and the rules of professional conduct set out in the *Regulation respecting the ethics and professional conduct of public office holders*, as well as the code of ethics and professional conduct adopted by COMEX. In case of discrepancy between the texts, the more stringent rules and principles apply. The *Déclaration de valeurs de l'administration publique québécoise* also guides members in the performance of their duties.

The Review Committee's code of ethics, signed by every member, is available on the COMEX website at the following address: <http://comexqc.ca/en/a-propos/ethique-deontologie/>

COMEX recommendations

The JBNQA provides for three administrators for development projects submitted to impact assessment and review: one for matters respecting provincial jurisdiction, one appointed by the Cree Nation Government for proposed development on Category I lands, and one for matters respecting federal jurisdiction. Projects involving federal jurisdiction are submitted to the Federal Review Panel (COFEX-South).

After reviewing a project submitted for its consultation and comments, COMEX forwards its recommendations to the appropriate Administrator responsible for Section 22 of the JBNQA. It is up to the Administrator to decide whether or not to authorize a project and, if so, under what conditions. If the Administrator is unwilling or unable to accept any recommendations of the Review Committee or wishes to modify such recommendations, they must consult with the Review Committee to explain their position (para. 22.6.17, JBNQA).

Up until October 2022, the Administrator appointed by the Gouvernement du Québec was Marc Croteau. The current Administrator is Marie-Josée Lizotte, Deputy Minister of the MELCCFP. The appointee for the Cree Nation Government is Isaac Voyageur, Director, Environment and Remedial Works Department, Cree Nation Government.

Public participation in the Review Committee's work

COMEX adopted a directive on public participation that is available on its website at the following address:

<https://comexqc.ca/en/participation-publique/information-generale/>

COMEX's concept of public participation hinges on three elements: information, consultation and public hearings. First, project-related information made available to the public must be complete and accessible. This is the bedrock of any public participation process. In COMEX's case, this means making publicly available all information related to its mandate, procedures and working methods, as well as information about projects that are under review or have completed the review process. Accordingly, all of this information is posted on the COMEX website.

Second, at the consultation stage, COMEX seeks views and opinions on the projects under review. As soon as the COMEX website announces that a project is "under

review"—and then throughout the review process—any interested party may submit their comments and opinions, either via the COMEX website or by mailing or emailing them to the COMEX secretariat.

Third, the public hearing process consists of an information and consultation session, held in a community at a designated time, to gather comments and opinions on a given project or on any planned changes to a project. The consultation stage is an opportunity for the public, the project proponent and COMEX members to share information and discuss the project. All COMEX hearings are public. In accordance with the directive on public participation, "The Review Committee determines whether a public hearing is needed after taking into account the social and environmental impacts of a project, initiatives undertaken by the proponent, and the comments and concerns it hears during the consultation process."



Current issues for COMEX

In the last few years, COMEX has faced issues that go beyond the review of a given project's environmental and social impacts. This is the case for issues regarding wetland conservation and the cumulative impacts of road transportation in the Eeyou Istchee James Bay territory. The COMEX members met with Marie-Josée Lizotte, the Provincial Administrator for Section 22 of the JBNQA, to share their views on optimizing the environmental and social impact review procedure for northern projects, to express their concerns about the cumulative impacts of transportation and, lastly, to discuss the compensation for wetland loss.

Optimization of the impact assessment and review procedure for northern projects

COMEX has taken several steps in recent years to improve understanding of the environmental and social impact assessment and review of projects in the Eeyou Istchee James Bay territory. In response to proponents' observations regarding delays in the project review process or keeping all contributors to the review process abreast of developments, the COMEX members participated in activities to ensure greater public visibility of the Review Committee, including participation in conventions and conferences to explain the environmental and social impact review process.

Despite its efforts, COMEX notes that proponents still do not fully understand the review process for northern projects. As a result, COMEX must repeatedly send questions and comments to the Provincial Administrator, who then forwards them to the proponent, to obtain the information needed to continue reviewing the project. It is also not uncommon for proponents to take several months to respond to COMEX's questions and comments. The Review Committee pointed out that any significant delay in the project review process or the implementation of a project once it has been authorized is likely to result in disappointment and some bitterness not only among the communities concerned, but also among the population in general.

To minimize delays during analysis, COMEX is calling on the MELCCFP to better inform proponents about the environmental and social impact assessment and review procedure under Section 22 of the JBNQA, particularly the importance of submitting fully defined projects and a complete impact assessment study. COMEX also wants proponents to be notified of the timeframe for reviewing projects subject to impact assessment and the fact that COMEX can hold public hearings and consultations at its discretion.

In the case of mining projects, the MELCCFP meets with the proponent at the start of the procedure to stress the importance of providing complete information. According to the Provincial Administrator, the same approach could be applied for all other projects automatically subject to the review procedure in order to fully explain the environmental and social assessment and review procedure. The MELCCFP would also take this opportunity to inform the proponent of the normal timeframes related to the review procedure and the public hearing mechanism. Preliminary timelines could also be provided to proponents so that they can visualize the steps involved in the procedure and where there might be delays.

Cumulative impacts of transportation

Of all the projects reviewed by COMEX in recent years, mining projects account for a substantial share of developments in the Eeyou Istchee James Bay territory. The review process and the public hearings held in the impacted Cree and Jamésien communities have brought to the fore, among other things, safety issues or perceived risks associated with transporting supplies to mine sites and hauling the products of mining activities off site. In addition to user safety, other issues of concern include nuisances, dust raised by vehicles on unpaved roads, noise, deterioration of air quality and premature damage to the road infrastructure.

COMEX acknowledges that the cumulative impacts of transportation involves all proponents and therefore no one proponent is responsible for finding a solution that is acceptable to all. Responsibility for northern roads is shared among several stakeholders, be it for cleaning, maintaining or setting traffic standards: Ministère des Transports et de la Mobilité durable, Hydro-Québec, Ministère des Ressources Naturelles et des Forêts, Société de développement de la Baie James and the Société du Plan nord, which plays a key role in integrated development.

It is COMEX's hope that a coordinated vision of transportation, built on data from every mining project, will help guide the actions of the above stakeholders and control vehicular traffic to ensure that the territory's roads are safe for all users. COMEX suggested setting up a committee to promote networking between the different regional players involved in road management and maintenance as well as government experts in heavy transport, road safety and standards for each type of road, and share expertise on the cumulative impacts of transportation.

The Provincial Administrator said that the concerns raised by COMEX were valid. The MELCCFP will contact the various

stakeholders to gauge their interest in participating in a networking exercise to share opinions and concerns about the cumulative impacts of transportation associated with mining projects.

Compensation for wetland loss

In 2017, the National Assembly passed the *Act respecting the conservation of wetlands and bodies of water* for the purpose of offsetting the loss of wetlands and bodies of water in Québec. The Act contains provisions related to knowledge, protection and restoration of wetlands and bodies of water, as well as compensation measures in cases where it is not possible to avoid adverse effects.

COMEX always takes the adverse effects on wetlands and bodies of water into consideration when assessing the impacts of a project. However, in northern regions, where peat bogs and other wetlands abound, compensation for temporary or permanent impacts on these environments cannot easily be applied in accordance with the steps and terms set out in the *Regulation respecting compensation for adverse effects on wetlands and bodies of water* (RCEWBW) because the Regulation does not apply to territories under agreement. In addition, the ecological value of wetlands and bodies of water is still not clearly defined.

In recent years, COMEX has approved or reviewed the compensation measures proposed by the operators of several mines, including financial contribution to research projects on the characteristics of northern wetlands, restoration of abandoned borrow pits and road segments, assisted migration and restoration of ecosystem services. However, it will take years to assess the usefulness and effectiveness of such measures. COMEX is also concerned about the consistency and fairness of proponents' compensation measures.

COMEX wants to see thought given to best practices in compensation for wetlands and

bodies of water in the unique context of territories under agreement.

COMEX learned that a departmental working committee was set up in winter 2023 to address this concern. The primary mandate of the committee is to identify short and medium-term solutions for compensating adverse effects on wetlands and bodies of water north of the 49th parallel and ultimately establishing

administrative parameters that are coherent and fair. As part of its mandate, the committee will consult the review and evaluating bodies created by sections 22 and 23 of the JBNQA, particularly COMEX, to share its thoughts and suggestions with a view to establishing administrative parameters for compensation for adverse effects on wetlands and bodies of water in territories under agreement.



Communication, meetings and projects

Communication

Website

COMEX updates its website on a weekly basis to post the latest news on projects submitted for its review. The main purpose is to ensure greater transparency and allow all interested parties to stay informed about a project or changes to a project and consult the related documents. A continuous effort is made to show due diligence in providing the affected communities, where necessary, with project-related documents in English and Cree, in addition to French.

Between April 1, 2022 and March 31, 2023, 15,952 users visited the website, viewing 52,098 pages in 25,113 sessions. The average session duration was 1 minute 37 seconds. That represents a roughly 10% increase in visits to COMEX's website over the previous year. The increase can be attributed to numerous factors, including the arrival of new players and projects in the territory and the public hearings held by COMEX in January 2023.

The number of visits to COMEX's website has increased annually for at least the last five years.

Social media

COMEX posts certain information on its Facebook and Twitter accounts to reach a wider public.



External communication and information channels

COMEX is always on the lookout for external communication channels and forums for raising awareness and enabling a better understanding of the environmental and social impact assessment and review procedure.

COMEX MEETINGS

In addition to sustained interaction during the year, the COMEX members met by video conference (Teams) eight times and twice in person to discuss projects submitted to the environmental and social impact assessment and review procedure.

- ⊕ 403rd meeting: April 21, 2022
- ⊕ 404th meeting: May 25, 2022
- ⊕ 405th meeting: June 14, 2022
- ⊕ 406th meeting: July 26, 2022
- ⊕ 407th meeting: September 20, 2022
- ⊕ 408th meeting: November 2, 2022
- ⊕ 409th meeting: December 5, 2022
- ⊕ 410th meeting: January 24, 2022, in Eastmain
- ⊕ 411th meeting: February 15, 2022
- ⊕ 412th meeting: March 29, 2022, in Québec

PROJECTS THAT WERE THE SUBJECT OF A FULL REVIEW, A MODIFICATION OR MONITORING

Between April 1, 2022 and March 31, 2023, several decisions and recommendations were adopted and entered in the decisions register and the various meeting minutes, all of which are available on COMEX's website at <http://comexqc.ca/en/comex-documents>. Projects can be modified or followed up on after COMEX has made its recommendation.

Questions and comments sent

- ⊕ Eastmain-1-A and Rupert diversion project
 - ⊕ Follow-up on conditions of the CA
- ⊕ Extension of forest access roads "H, Section west" and "I"
 - ⊕ Application to amend the CA
- ⊕ Extension of Route 167 North to the Otish Mountains
 - ⊕ Follow-up on conditions of the CA
- ⊕ Establishment of a quarry over 3 ha in size near the La Grande-3 hydroelectric development
 - ⊕ Environmental and social impact assessment

Questions and comments sent

- ⊕ James Bay Lithium Mine Project
 - ⊕ Environmental and social impact assessment
- ⊕ Processing of gold ore from the Barry and Moroy projects
 - ⊕ Environmental and social impact assessment

Recommendations

- ⊕ Whapmagoostui-Kuujuaraapik Hybrid Power Plant Project, KWREC
 - ⊕ Environmental and social impact assessment
- ⊕ Rose Lithium-Tantalum Mining Project, Critical Elements Lithium Corporation
 - ⊕ Environmental and social impact assessment
- ⊕ Connecting the Rose Lithium-Tantalum Mine and relocating a segment of the 315-kV line, Hydro-Québec
 - ⊕ Environmental and social impact assessment
- ⊕ Dewatering of the J-4 and 87 pits on the former Troilus site, Troilus Gold Corp.
 - ⊕ Application to amend the CA
- ⊕ Quarry C-02 expansion project, Éléonore mine site, Goldcorp Canada Ltd.
 - ⊕ Application to amend the CA
- ⊕ Whabouchi Project – Prolonged use of the temporary camp, Nemaska Lithium
 - ⊕ Application to amend the CA

Follow-up of conditions, annual and/or other monitoring

- ⊕ Eastmain-1-A hydroelectric and Rupert River diversion project
 - ⊕ COMEX examined 19 monitoring reports on conditions of the CA for this project, including Cree land users' perception of water quality and navigation conditions, fish communities and population dynamics (lake sturgeon, cisco, lake trout, etc.) in the Rupert River and diversion bays, and land use planning. For more information on the Review Committee's recommendations, see the meeting minutes at comexqc.ca/en/comex-documents/.
- ⊕ Extension of forest access roads "H, Section west" and "I"
 - ⊕ Application to amend the CA
- ⊕ Extension of Route 167 North to the Otish Mountains
 - ⊕ Follow-up on conditions of the CA
- ⊕ James Bay Lithium Mine Project
 - ⊕ Announcement of public hearings

PROJECT SUBMITTED TO PUBLIC HEARINGS

COMEX held public hearings in hybrid mode (combination of in-person and video conference) in Eastmain and Matagami on January 24, 2023 and January 25, 2024, respectively. The COMEX members were on hand in the Cree community of Eastmain and the city of Matagami to hear the public's views, opinions and concerns about Allkem/Galaxy Lithium's James Bay Lithium Mine Project.

After concluding the public hearings, COMEX continued reviewing the project and will make a recommendation to the Provincial Administrator regarding whether or not to authorize the project.

Resources

Human and material resources

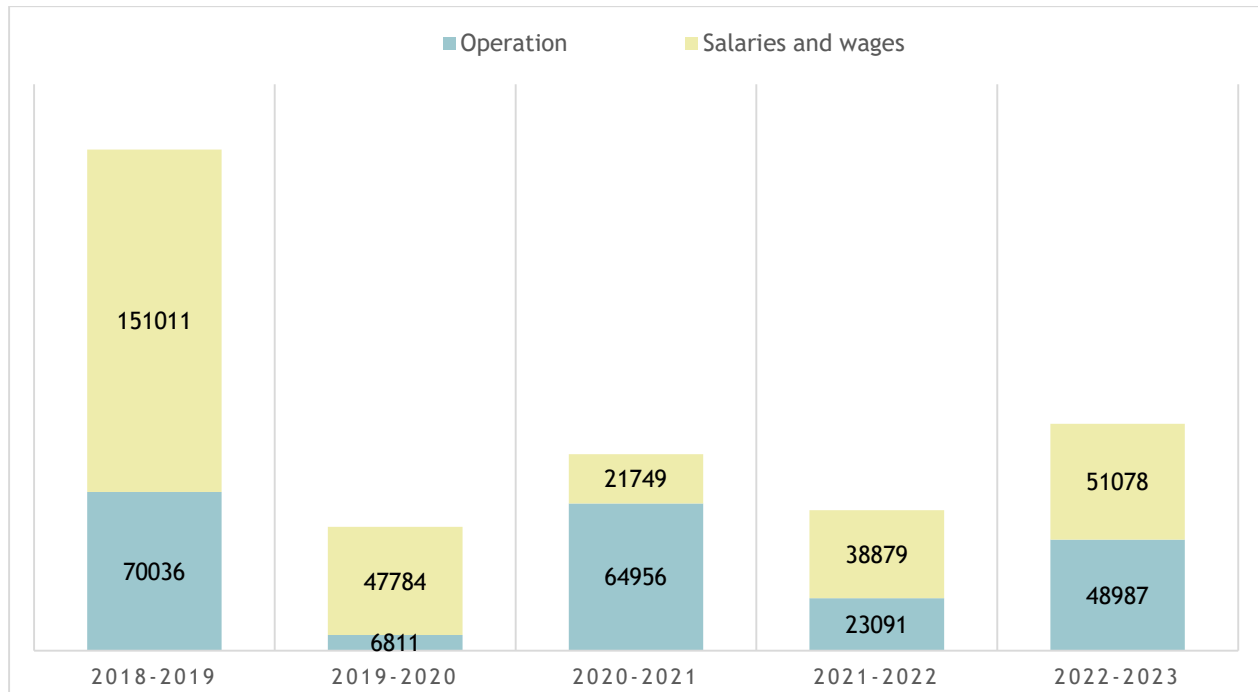
The JBNQA stipulates that the Review Committee “shall be provided with an adequate staff to fulfil its functions and such staff shall be maintained and funded by Québec” (para. 22.6.3). Accordingly, the Ministère de l’Environnement, de la Lutte contre les changements climatiques, de la Faune et des Parcs handles the operations and associated costs of the Review Committee’s secretariat. It also appoints some of its employees to assist in the analysis of projects reviewed by COMEX.

The secretariat is headquartered in the city of Québec and has its office at the MELCCFP. The executive secretary manages the official documents of the Review Committee, sees to the organization of meetings and writes up the minutes. She also follows up on official correspondence and is the administrative contact person. The executive secretary is also charged with updating COMEX’s website. The position of executive secretary is currently held by Sophie Cooper.

The Cree Nation Government (CNG) maintains its own environmental and social assessment secretariat. In consultation with the executive secretary of COMEX, the CNG secretary follows up on official correspondence and is the administrative contact person for the Regional Administrator, the CNG-appointed members of COMEX and CNG project analysts. The CNG secretary also stays in close, constant contact with the members of the Cree communities. In 2022-2023, the position was held by Kelly Leblanc (until October 2022), on an interim basis by Anna Krupa (October 2022 to March 2023) and by Graeme Morin (since March 2023).

Finances

As stipulated in paragraph 22.6.3 of the JBNQA, the Review Committee is provided with an adequate staff to fulfil its functions and such staff is maintained and funded by Québec, “subject to the approval of budget for same.” The following chart shows the expenditures incurred by the Review Committee in recent years:



Total expenditures funded by the Québec government.
Expenditures paid by the Cree Nation Government are not shown.

**Comité d'examen des répercussions
sur l'environnement et le milieu social**

**Environmental and Social Impact
Review Committee**

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