

CRITICAL ELEMENTS LITHIUM CORPORATION  
**ROSE LITHIUM-TANTALUM PROJECT –  
ANSWERS TO THE COMPLEMENTARY  
QUESTIONS AND COMMENTS FROM THE MELCC  
FILE 3214-14-053**

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# 1. INTRODUCTION

In October 2021, Critical Elements Lithium Corporation (CEC) received from the Ministry of Sustainable Development, Environment and the Fight against Climate Change (MELCC) complementary questions and comments addressed to CEC in the context of the analysis of the update of the Rose Lithium-tantalum project's (the Project) Environmental Impact Assessment (EIA). These questions and comments were issued following the analysis of the Environmental and Social Impact Review Committee (COMEX) carried out on the basis of the information provided to date by the CEC, same as the analysis carried out by the Directorate of Environmental Assessment of Northern and Mining Projects in collaboration with the relevant administrative units of the MELCC and certain other ministries, as well as with the collaboration of the Environment and Restoration Works Directorate in Cree government of the nation.

The present document fully incorporated the content of the document sent by the MELCC, followed by CEC's answers. These answers allow the COMEX to continue the Project analysis. Section 2 of the present document transcribes the information requested by the MELCC, followed by CEC's answers. In order to facilitate the distinction between these different texts, the information requests by the MELCC are presented in *italic*.



## 2. QUESTIONS AND COMMENTS BY THE MELCC

### I. PROJECT DESCRIPTION

#### MANAGEMENT OF RESIDUAL MATERIALS

**QC4-1.** *In QC3-10, the promoter had to indicate what involvement Nemaska Development Corporation (NDC) could have in the management of residual materials and report the discussions held in this regard. The promoter mentioned that discussions were still ongoing between Critical Elements Corporation (CEC) and NDC. The promoter must confirm who will be awarded the residual materials management contract and provide details of the services offered. Information related to the transport of residual materials must also be presented.*

#### ANSWER

As mentioned in answer QC3-10, CEC is in communication with Nemaska Development Corporation (NDC) and is awaiting a response from NDC regarding the services offered and the rates. It should be noted, however, that it is too early in the process for CEC to be able to award contracts relating to the management of residual materials. Indeed, the final investment decision has not yet been taken as CEC is still awaiting the MELCC decision and the financing of the Project remains to be finalized. CEC is in discussion with several suppliers and is considering various options, such as collaboration with other projects in the sector.

#### IMPLEMENTATION SCHEDULE

**QC4-2.** *The promoter must present an update of the schedule for carrying out the project.*

#### ANSWER

The sequence of calendar activities is the same as that presented in response to question QC3-11. The start of work is always subject to obtaining environmental authorizations and financing. On August 10, 2021, the Federal Minister of the Environment and Climate Change delivered the Environmental Assessment Decision Statement to CEC, thereby authorizing the Project as presented (including the proposed mitigation measures) to proceed. CEC is still awaiting clearance from MELCC. Obtaining this authorization as soon as possible would facilitate the procedures for financing the Project so that CEC would be able to start the land preparation work in 2022.

**Table QC4-2. Updated Project calendar**

SECTOR	ACTIVITY
<i>Construction Phase (years -2 to -1) – or after reception of authorizations</i>	
Preparation of the site	Mobilisation and installation of the construction infrastructure
	Implantation of the temporary access paths from the exploration paths
	Clearing and grubbing
	Removal and stockpiling of overburden
	Leveling and excavation of the industrial platform
	Exploitation of borrow pits and waste from the pit for construction
Construction of infrastructures and the mine site	Construction of the access paths, service routes, and ditches
	Installation of surface water regulation devices as well as protection against erosion and sedimentation
	Construction of the concentration plant
	Construction of the administrative building, drying section for workers, and the garage for pit equipment maintenance
	Construction of the diesel fuel and liquid natural gas warehouses
	Construction of the collection basin and final effluent treatment plant
	Development of the overburden stockpile
	Development of phase 1 of the co-deposit waste pile
	Development of the ore stockpile
	Development of the ditches and collection basins for management of the waters from the platform, co-deposition stockpile, and the ore stockpile
	Implantation of the PP1 wells for procurement of fresh water
	Excavation of waste and ore from the pit in anticipation of the plant start-up
Construction of the electric station and 25 kV electrical lines	
Equipment for construction, transportation and traffic	Operation, maintenance and vehicle traffic of the equipment required for the worksite (bulldozer, drills, excavators, etc.)
	Road transport of construction equipment and circulation of the workforce

SECTOR	ACTIVITY
Management and elimination of hazardous and residual materials	Handling, management, and transportation of residual materials and hazardous materials to be eliminated, recycled, or reused
<b><i>Operation and Maintenance Phase (years 1 to 17) – two years after having received authorizations</i></b>	
Mining operation of open-air pit	Excavation of the overburden of the pit
	Drilling, dynamiting and extraction of the ore for a total of approximately 209 million tons over the total duration of the Project
	Dewatering of the pit by pumping of the mine water
	Drawdown of the water by the wells surrounding the pit
	Transport of the ore to the transformation plant
	Transport of the waste to the co-deposition stockpile
Ore processing	Crushing, storage, grinding, sieving, ore concentration by magnetic, gravity, and flotation separation
	Production of lithium concentrate
	Production tantalum concentrate
	Transport, storage and use of chemical substances
Waste management	Deposit by truck of the tailings in the co-deposition stockpile
	Progressive rehabilitation of the co-deposition stockpile
Management of water and water balance	Provision for water requirements by the PP1 pumping wells
	Management of water: effluents, mine water, process and runoff water, and domestic waters. Clean water, not having been in contact with the mine site, will be routed to a discharge point
Management of hazardous materials and residual materials	Handling, management, and transportation of residual materials and hazardous materials to be eliminated, recycled, or reused
Mining Equipment	Use, maintenance and traffic of heavy machinery and vehicles. The anticipated equipment are the following: mining trucks, hydraulic excavators, rotary and percussions drills, backhoe loader, water and fuel tankers, graders, sanders, bulldozers on tracks and wheels

SECTOR	ACTIVITY
Infrastructures	Installation of the other wells for the drawdown of the water by the wells surrounding the pit
	Installation of the 25 kV electrical line for the pumping wells around the pit
	Development of phase 2 of the co-deposit waste pile
	Development of the access road, ditches and collection basins, and the 25 kV electrical line for phase 2 of the co-deposition stockpile
	Progressive revegetation of the co-deposition stockpile
<b><i>Close-out and Restoration Phase (years 18 to 24) – seven years after operation</i></b>	
Site decommissioning	Dismantling of buildings and support infrastructures
	Removal of the infrastructure for mine water collection and treatment and for water requirement provision
	Closure of the drawdown wells
	Installation of warning signs around the open-pit mine
Site Rehabilitation	Final rehabilitation and revegetation of the mine site and co-deposition stockpile
	Impoundment and securing of the pit area
	Management of waste and hazardous materials
	Rehabilitation of contaminated soils, if applicable
	Management of access to the site

**QC4-3.** *In the answer to question QC3-11, the schedule still indicates the construction of a dyke at Lake 3, although this dyke has been removed from the project. The promoter must confirm the removal of the dyke at Lake 3 from the project. If applicable, the promoter must provide an up-to-date map of the project, without a dyke at lake 3.*

**ANSWER**

The dyke at Lake 3 has been removed from the Project. A map of the Project without the dyke at Lake 3 can be found in Appendix QC4-3.

## II. BIOPHYSICAL ISSUES

### GEOCHEMICAL CHARACTERISATION

**QC4-4.** *In QC2-11 and QC3-5, it is mentioned that one of the amphibolite samples (S659713) shows results which indicate an increase in the concentration for various parameters which approach the resurgence criteria in surface water of the Intervention Guide - Soil protection and rehabilitation of contaminated sites, in particular for copper. The promoter indicated in July 2020 that testing on this sample was still ongoing because the results had not stabilized. The promoter must provide the results of these tests in order to confirm whether this amphibolite sample is leachable, or not, in metals. The report should include an analysis of the results obtained and explanations of the trends observed. Depending on the results obtained, the proponent must describe the planned management measures to take into account the proven nature of the mine tailings.*

### ANSWER

The kinetic test on an amphibolite sample which was still in progress was completed in October 2021. The results are presented in a document in Appendix QC4-4 (Lamont, 2021). The new results available demonstrate that all of the waste rock lithologies are not potentially acid-generating, and also demonstrate the very unreactive geochemical behavior of the Project waste rock. The conductivity measures are very low and the water has a low content of metals and dissolved elements. It is therefore consistent that the concentrations of metals and dissolved elements are also low. The pHs tend to decrease slowly over the course of testing, but it is important to remember here that the pH of the water used for the rinses is initially 5.0 to 5.5. The pH values did not drop below this range so there was no acid generation.

As for the assessment of the leaching potential, it is mentioned in the Mine Tailings Characterization Guide (MELCC, 2020) that a humid cell test is not the best choice for this assessment. The humid cell testing program first assessed the potential for acid generation. Comparisons of humid cell kinetic test results with water quality criteria are unrealistic since humid cell kinetic test results come from 100% oxygenated and highly diluted conditions. The test was not designed to predict the concentration of elements when the rocks are in pile. Rather, it is used to determine the rates of oxidation, neutralization and leaching of metals which could then be used in prediction. The copper level in the test with the amphibolite sample, once the data has stabilized, is approximately 0.03 mg/kg/week. This is the maximum average copper level obtained during kinetic tests. The average copper level, weighted according to the proportions of each waste rock lithology estimated from all the kinetic tests, is 0.00194 mg/kg/week.

In addition, another humid cell kinetic test with a sample of the same amphibolite lithology gave lower copper concentrations (Lamont, 2020). So it is possible that only a fraction of the amphibolite lithology will release higher concentrations of copper once

these are stockpiled. As the amphibolite lithology represents only about 10% of the waste rock, more than 90% of the waste rock stored in the future in the stockpile would be non-leachable.

Finally, during the geochemical characterizations, the results of the static tests of which are presented in the reports by Lamont (2017) and Lamont (2018), it had been shown that the samples were non-leachable. A few copper concentrations higher than the groundwater quality criterion resurfacing in surface water in the Intervention Guide - Soil Protection and Rehabilitation of Contaminated Sites (Beaulieu, 2021) were measured during the TCLP leaching tests and CTEU-9. However, it was not for the same samples, and some of them with a copper content lower than the background content (criterion A of the Intervention Guide - Soil Protection and Contaminated Land Rehabilitation (Beaulieu, 2021)). They were therefore not leachable according to the classification of the Mine Tailings Characterization Guide (MELCC, 2020). Since the copper concentrations were relatively low in the solids (67 to 110 mg/kg while Criterion A is 65 mg/kg) and the sulphide content is low in the rocks, the probability of copper leaching in the contact water is very low. Thanks to the geological and mineralogical information available (Jourdain, 2020), the copper would come mainly from chalcopyrite, a sulphide present in the form of disseminated grains or in veins and in association with pyrite. Sulphides are present in traces, and locally up to a few percent. The compilation of the descriptions of the drilling data made it possible to estimate the total length of the intervals containing sulphides at 0.9% of the length of the waste rock intervals within the proposed pit. The presence of sulphides in the rock lithologies of the Project therefore remains marginal.

Although the latest results obtained during the kinetic test with an amphibolite sample show slightly higher copper concentrations, it is estimated that all of the waste rock would be non-acid generating and non leachable. Mitigation measures as described in the documents of the environmental impact assessment study, including the method of deposition and groundwater protection measures in connection with the choice of the location of the co-disposal waste rock and tailings pile will be conserved.

## MINE WASTE MANAGEMENT

**QC4-5.** *In QC3-8, the promoter had to assess a variant which consisted of accumulating mine tailings in the pit and justifying their choice. The promoter's answer refers to the backfilling of the pit at the end of operations, during restoration and rehabilitation, without taking into account the possibility of using the pit during operation for tailings management. As the backfilling of the pit in the context of site restoration is addressed by a provision of the Mining Law (art. 232.3, 5 °), the validity of the arguments presented by the promoter will be assessed during the approval of the restoration and rehabilitation plan. On the other hand, the possibility of progressive backfilling of the pit during operation, in particular in order to reduce the footprint of the tailings stockpile, must be evaluated immediately by the promoter.*



## ANSWER

The geometry of the pit does not lend itself to gradual backfilling with plant residues during operation. Gradual backfilling during operation can be done when an operation includes several pits and they are operated sequentially or when a pit is very long and operated progressively from one end to the other so as to allow backfilling of a pit zone without interfering with the activities and safety of the areas in operation.

The Rose pit excavation sequence is southwest to northeast. The excavation follows the pegmatite dykes. It is in these that the ore is found (spodumene and tantalite). The pegmatite dykes dip north, northeast (NNE) at a dip varying between 30 and 35 degrees. The lower pegmatite dyke excavation forms the south, southwest (SSW) wall of the pit. The main ramp is placed in this wall. The other walls of the pit have an overall angle of 55 degrees from the horizontal. The ultimate exploitation of the ore is located under these walls and does not allow any deposit of waste rock or tailings during the exploitation phase of the pi.

The area of the pit in which waste rock storage could be considered is on the SW wall between two portions of the main ramp. A preliminary estimate indicates that around 7M tonnes of waste rock could be left in this area during the mining of the pit. Its feasibility in relation to the safety of underground workers will remain to be demonstrated. This area is not conducive to the storage of plant tailings, the maximum slope of a tailings bank being 5H: 1V versus about 2H: 1V for waste rock. In addition, transporting waste from the plant to this sector rather than waste rock from the pit would generate more GHGs.

## PHYSICOCHEMICAL CHARACTERIZATION OF SOILS

**QC4-6.** *In question QC3-13, the promoteur was asked to complete the physicochemical characterization work of the initial state of soils in order to comply with the recommendations of the Guide for the physicochemical characterization of the initial state of soils before an industrial project (hereinafter referred to as Guide). The promoter was also asked to present the results of the initial state of soil contents.*

*The answer provided so far only presents a program of work to complete the assessment of natural background levels in soils. The promoter must present the results of this characterization. This data is necessary in order to know the natural initial state contents of the soils before there are any disturbances. In addition, these results will allow better monitoring of the rehabilitation works at the end of the mining project. The promoter must submit a complete and final study, including the initial state grade results for the soils of the Rose Lithium-Tantale mine.*

## ANSWER

During the second request for information from the MELCC, CEC presented a preliminary work program for the evaluation of the natural background content of

metals in natural soils (QC2-43) to improve the characterization done in 2017 in order to include the elements requested by the MELCC in this request for information. Following this, the MELCC added, in the third series of questions (QC3-13) several comments that CEC should take into account and include in the work program. A call between the MELCC analyst and the CEC analyst in June 2018 enabled CEC to better target the MELCC's expectations and include them in the work program. To this end, CEC has included the following items:

- Two units of surface deposits will be considered, the glaciofluvial deposit composed of sand and gravel and the till horizon composed of a matrix of silt and sand. These units may be adjusted according to the results of the work carried out.
- For each unit more than 30 samples will be analyzed in order to obtain a sufficient number of analyzes for each parameter.
- The choice of parameters analyzed is based on the parameters recommended in section 2.2.6 of the characterization guide. Additional parameters have also been added such as lithium and tantalum.
- An evaluation of the radioactivity will be carried out on the new samples.
- Twenty samples will be taken from the extended area in order to establish the metal content in the soil serving as a benchmark in the event of airborne contamination. The extended area was established based on the prevailing winds at the site.

The physicochemical characterization of the soils, which will be used to establish the initial state before construction, is currently underway and will be completed by the start of construction, as already mentioned in previous correspondence. The final report will be sent to government agencies as soon as it is available.

**QC4-7.** *In order to complete the work program proposed in the appendix to question QC2-43 and QC3-13, the promoter must take into account the following comments:*

- *Regarding the hydrostratigraphic units presented in section 2 - description of the lithology of the site, the bedrock should not be included in the same unit (unit 2) as the matrix which consists mainly of silt. The bedrock should be part of another unit. The typical layers presented should reflect the reality of the stratigraphic layers encountered in the field.*
- *The number of drillholes for the extended study area seems insufficient with regard to the area to be covered. In order to ensure the representativeness of the results, additional surveys are necessary to confirm that this is the same typical soil layer. The number of surveys shown on map 1 must be justified.*

#### **ANSWER**

Regarding the first point, about the hydrostratigraphic units presented in section 2, this is a typo. Indeed, the bedrock is considered to be unit 3.

In response to the second point, regarding the number of drill holes, new drill holes in the larger area have been added. A total of 20 manual holes will be sampled according to the recommendations of the guide to the physicochemical characterization of the initial state of soils. These are shown on Map 1 - Location of the proposed drill holes which can be found in appendix QC4-7.

The first 30 centimeters of soil are targeted in order to obtain an initial state of soil quality and to be able to assess possible airborne contamination in the future. The enlarged area was defined from the wind directions. The winds coming mainly from the south / southwest a greater proportion of sounding was positioned to the north / northeast. Manual surveys were also added in the remote area near the future dump in order to have a portrait of the soils in place on the entire periphery of the dump.

As access conditions can be difficult on the site, the samples were kept at a reasonable distance from the local area for accessibility reasons. Considering that the site is free from any human activity, the characteristics of the soils should be similar in the local area and the extended area.

### III. SOCIAL ISSUES

#### COMMUNITY WELL-BEING AND HUMAN HEALTH

**QC4-8.** *In response to QC3-18, the promoter mentions that they were unable to continue discussions with the Nemaska medical clinic and the CCSSSBJ relating to a possible partnership for medical services. The promoter must provide an update of these discussions and specify if they have reached an agreement.*

#### **ANSWER**

CEC will be autonomous with regards to health coverage, prevention and response to medical emergencies for its site, as required by CNESST standards and good industry practice. This will include an infirmary, on-site nursing staff and an available doctor. It is still planned to have an agreement with the Nemaska clinic and the CCSSSBJ for two-way collaboration. CEC intends, however, to continue collaborative efforts once its own autonomous system is further defined, in order to allow more constructive discussions when the key players have been identified, the available equipment known, etc.

During a meeting between CEC and the Nemaska clinic in 2018, the two parties discussed the possibility of an agreement concerning medical services. Employees at the Nemaska clinic have expressed concerns about the limited services they could offer as their priority is serving patients in the community. As a result of these discussions, CEC concluded that the best option would be to be self-sufficient. That being said, CEC remains open to collaboration with the Nemaska clinic in order to explore possible synergies.

**QC4-9.** *In question QC3-19, the promoter was asked to specify the measures planned to ensure the safety of users on the roads used. In its answer, the promoter indicates that the measures will be agreed upon with the responsible authorities and the main users during the preparation for the start of the project. The promoter indicates that the measures will generally concern road maintenance, snow removal, signage and the application of speed limits.*

*Considering the concerns relating to road safety, the promoter must develop and detail the measures planned to ensure the safety of users on the roads used. They must also present a summary of the discussions held with the responsible authorities and partners in relation to the application of all the planned measures. As mentioned in the answer to QC-3 of the document providing answers to questions and comments following the public hearings, a system for receiving and resolving complaints will be put in place. The promoter must detail the expected effectiveness of such a system on the impact of the increase in road traffic, and what additional measures could be put in place following a complaint.*

#### **ANSWER**

*i) Detail the measures planned to ensure the safety of users on the roads used:*

The following mitigation measures (taken from Table 13-4 - Summary of environmental effects on the human environment) will be put in place from the start of the construction phase to ensure the safety of users on the roads:

- It will potentially be possible to use vehicles equipped with speed controllers for trucking (heavy transport).
- The company's Health and Safety department will remind employees of the importance of respecting speed limits and educate employees on the impact on Cree users (trapping and opportunistic hunting practices) on a regular basis (every three months)
- CEC can also collaborate with the SQ or the competent authorities within the framework of speed measurement campaigns and speed controls if necessary.
- The increased traffic associated with the Project will require additional maintenance to keep the roads in good condition. In winter, the roads will be cleared of snow as often as necessary to maintain a safe condition on the roads.
- Road safety and the points mentioned above will be discussed with the SDBJ and the main users.
- Sensitization of workers and transporters to the need to respect road safety rules and, if necessary, take measures in collaboration with the competent authorities to ensure the safety of users of the Nemiscau-Eastmain-1 road (CCE-74)
- CEC undertakes to monitor the effects of the increase in heavy traffic on the Nemiscau-Eastmain-1 road on the quality of the experience in the camps and on access to the territory through the implementation committee. (ACEE-134 and QC2-79)

- CEC agrees to initiate, before the start of construction, discussions with the Nemaska tallymen affected by the road transport of the Project regarding signage by posters of camps and access routes. (CCE-76)
- As far as possible, distribute heavy traffic over the whole day and week in order to avoid intensive periods of this type of traffic
- The circulation study will be shared with the Eeyou Istchee Baie-James regional government as well as the cities and communities affected by transportation, namely the cities of Matagami, Chibougamau and Nemaska. (QC-13)
- CEC's vehicles and those of its suppliers will have to respect the speed limit under penalty of expulsion. Road signs will be added to remind people of the speed limit at an appropriate frequency. (QC2-58)
- Drivers will be equipped with radios and road users will be able to communicate with them. (ACEE-146)
- The measures put in place to ensure the safety of users on the roads (mentioned above) will be discussed with the SDBJ and the main users

It should be noted that the safety of users on the roads will be part of the monitoring program and that, if necessary, either in the light of discussions within the exchange and consultation committee or in the light of discussions with the competent authorities, additional mitigation measures may be added.

ii) *Provide a summary of the discussions held with the responsible authorities and partners in relation to the application of all the planned measures:*

The summary of the discussions is presented in answers QC2-8 and QC3-23 (of the second and third requests for information). There have been no discussions since and therefore no new updates.

iii) *Detail the expected effectiveness of such a system on the impact of the increase in road traffic, and what additional measures could be put in place following a complaint:*

CEC intends to put in place a system for receiving and resolving complaints which will include an email address and a telephone number, as is already the case on the CE website, in the Contact us tab.

Complaints received will be the subject of an acknowledgment of receipt, they will be evaluated and directed to the right person or committee responsible for the issue in question. It will be part of the task of the communications/community relations department to provide feedback to the complainant on the status of the complaint and the methods of resolution if necessary.

CEC will encourage stakeholders to contact the committees set up to ensure continuous discussion and ensure prevention in the field of transport in particular and any other activities in general. CEC wishes to foster a culture of prevention (instead of a culture

of reaction and correction), and this will be reflected in its discussions with stakeholders.

**QC4-10.** *The promoter must clarify whether the number of trucks entered in question "QC-1: Responses to questions and comments following public hearings: Table 78 - Number of blasts and trucks" refers to the average or critical scenario, and if it is planned to reduce the number of trucks transporting materials to the mine and those transporting materials produced by the mine during hunting periods or other traditional activities.*

**ANSWER**

In the 2018 WSP study on the circulation of the Project, the reference period of the analysis is one day. Two (2) scenarios were studied, namely the critical scenario where at least one truck per type of material would arrive and leave the site in the same day and the average scenario which corresponds to the average number of trucks per day, calculated by dividing the number trucks over one week per seven days. The number of trucks entered in table 78 corresponds to both scenarios since it shows the number of trucks per week.

**Table 78: Number of blasts and trucks**

	<b>Regular operation No/week</b>	<b>Hunting period No/week</b>
Blasts	7	3
Trucks	308	100

**HISTORICAL, CULTURAL AND ARCHAEOLOGICAL HERITAGE**

**QC4-11.** *In response to QC3-20, the proponent indicates that the inventory of areas of archaeological potential was scheduled for fall 2020. Areas of potential 1, 2 and 5 could be affected by project activities or infrastructure. In the event that these sites must be preserved, the excavation sequence may have to be adapted (zone 1), a pylon be moved (zone 2), a basin or the explosives store relocated (zone 5).*

*Given these implications, the promoter must present the results of the archaeological inventory and confirm whether the modifications presented in the previous paragraph will be carried out. In addition, the promoter must specify the mitigation measures that will be implemented, following the recommendations of the inventory, if applicable.*

**ANSWER**

Fieldwork for the archaeological inventory was carried out in July 2021. No discoveries were made during the inventory. Archaeologists consider that no archaeological site is

within the perimeter of the identified potential zones, including zones 1, 2, and 5. No modifications to activities and infrastructure are necessary. A letter to this effect can be found in Appendix QC4-11.

The Ministry of Culture and Communications (MCC) issued the permit for the excavations around July 9, 2021. Archaeologists have one year to submit the report to MCC. As is their habit, they complete the fieldwork in the fall and write their report in the winter. The report will be submitted to the MELCC as soon as it is available.





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