



Answers to Questions and Comments -
Change Notice to the Whabouchi Mining Project
January 15, 2025

ENV0514-1519-00_EN

Whabouchi Mine – Nemaska Lithium
April 24, 2025



James Bay, Québec

ANSWERS TO QUESTIONS AND COMMENTS

CHANGE NOTICE TO THE WHABOUCHI MINING PROJECT JANUARY 15, 2025


ENV0514-1519-00_EN



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APPENDIX

A. Whabouchi Site Development Plan (GCM, 2024)

1.0 **ADDITIONAL INFORMATION REQUIRED**

1.1 **Revision of the Mining Plan and the Extraction and Production Rates**

Section 5.0 of the Change Notice to the Whabouchi Mining Project of January 15, 2025 (the Notice) deals with an extension of the projected life of the mine, an increase in the pit area and an increase in the maximum daily concentrator feed rate. Section 6.0 of the Notice deals the projected modifications to the crushing circuit, the concentrator and the storage areas, including the addition or expansion of components associated with the project.

The Physical Activities Regulations (the Regulations) describe s the types of projects that may necessitate an impact assessment under the Impact Assessment Act (IAA). Section 19 of the Regulations more specifically concerns the expansion of a mine:

19 (c) in the case of an existing metal mine, other than a rare earth element mine, placer mine or uranium mine, if the expansion would result in an increase in the area of mining operations of 50% or more and the total ore production capacity would be 5 000 t/day or more after the expansion;

The area of mining operations is defined the Regulations as: “the area at ground level occupied by any open-pit or underground workings, mill complex or storage area for overburden, waste rock, tailings or ore. “

The Notice indicates that “even though the production capacity requested is greater than 5,000 t/d, the increase in the area of mining operations will be less than 50%.” The IAAC requires a justification, information in support of the assertion that the increase in the area of mining operations would be less than 50%. This justification should account for all the project components that are part of the definition of “area of mining operations” identified in the Regulations. It should include a calculation of the area related to the development of all of its components that were the subject of the environment impact assessment, which led to the issuance of the Decision Statement in 2015. It should also include the surface area of all the project components that are part of the definition of “area of mining operations”, the addition or modification of which is proposed in sections 5.0 and 6.0 of the Notice.

The IAAC requires the following additional information to assess whether the proposed modifications that are described in sections 5.0 and 6.0 of the Notice are activities subject to the Regulations:

1. *Indicate the areas of each of the existing (or authorized) components that are part of the definition of “area of mining operations”;*
2. *Indicate the areas of each of the project components that are part of the definition of “area of mining operations” that are proposed to be added or modified according to sections 5.0 and 6.0 of the Notice;*
3. *Calculate and present in tabular form the percentage increase of the area of mining operations based on the areas presented in points (1) and (2) above;*
4. *Provide a figure illustrating the components found in the proposed area of mining operations.*

Answers:

1. The areas of the components that were part of the project in 2015 are presented in the 2015 column of Table 1 below. The areas are taken directly from section 2.2 of the Notice, when available, or were estimated from the map in Figure 3 of the environmental assessment report if there were not reported directly (IAAC, 2015).
2. The expansion of the Pit (section 5.0 of the Notice) is considered in the first line of Table 1. The modifications to the crushing circuit (section 6.1), the addition of the flotation tank (section 6.2), the fine ore stockpile (section 6.6), the rejects stockpile (section 6.7) and the tailings silo and stockpile (section 6.8) are all considered in the area of the mining complex. The reduction of the overburden stockpile (section 6.3), the addition of the mixed stockpile [ore and overburden] (section 6.4) and the modification of the run-of-mine stockpile (section 6.5) are the subject of their own line in Table 1. Finally, the changes associated with Phase 1 of the co-disposal pile (waste rock and tailings) are described summarily in section 6.9, while no modification is planned for Phase 2.
3. Table 1 presents the surface area variations of the area of mining operations planned between 2015 and 2024. In short, the different modifications present a 7% increase in the area of mining operations.

Table 1. Modifications to the Components of the Area of Mining Operations

Component	2015 (IAAC)	Unit	Source	2024 (A-002)	Unit	Source
Pit	0.28	km ²	Section 2.2	0.42	km ²	Map 1
Mill complex	0.038	km ² (est.)	Estimated since Figure 3	0.05	km ²	Map 1
Run-of-mine (ROM) stockpile	0.0023	km ²	Section 2.2	0.012	km ²	Map 1
Waste rock and tailings stockpile (P1 and P2)	0.84	km ²	Section 2.2	0.78	km ²	Map 1
Overburden stockpile	0.086	km ² (est.)	Estimated since Figure 3	0.03	km ²	Map 1
Mixed stockpile			N.A.	0.04	km ²	Map 1
Total	1.2463	km² (est.)	Environmental Assessment Report (IAAC, 2015)	1.332	km²	Map 1
Increase				7%		

4. Map 1 attached to Appendix A illustrates the components of the area of mining operations, as planned in the 2024 Notice application, but with a higher level of detail. For example, the presentation of the new design of the mixed stockpile and the industrial area is identified in mauve.

1.2 Update of the General Location Plan and Modifications to the Related Facilities

Section 8.0 of the Notice indicates that: “Certain modifications made/planned to the Whabouchi project are not, to the understanding [of the proponent], subject to an application to amend the Decision Statement.” The modifications the proponent considers not subject to the application to amend the Decision Statement include the “update of the general location plan and modifications to the related installations”. Section 8.1 of the Notice includes a summary description of the project components that would be affected by the “update of the general location plan and modifications to the related installations”.

The IAAC requires the following additional information to assess if Condition 2.9 applies to the modifications to the project components concerned by the “update of the general location plan and modifications to the related installations”.

5. Indicate if the modifications to the project components concerned by the “update of the general location plan and modifications to the related installations” described in section 8.1 of the Notice would involve a change of location of each of the project components, represented in Figure 3 of the environmental assessment report.

6. If such is the case:

a. for each of the components concerned, provide the information required in Conditions 2.9.1, 2.9.2 and 2.9.3 of the Decision Statement;

b. provide a version of the figure requested in point 4 above, which illustrates the new location of each of the components concerned, including the changes to the project components since the publication of the environmental assessment report.

Answers:

5. Components presented in Figure 3 of the environmental assessment report; only modifications to the mining roads and the garage are mentioned in section 8.1 of the Notice.

Let us note that the modifications to the mining complex and the different stockpiles are addressed in detail in section 6.0 of the Notice and that the modification to water management is detailed in section 7.0.

It should also be noted that in compliance with Condition 3.4 of the Decision Statement (IAAC, 2023), the encroachments of the most recent development plan were used in the preparation of the offset plan for fish habitat loss linked to the completion of the project. Moreover, the discussions with Fisheries and Oceans Canada on the subject of this offset plan were already very advanced in March 2025.

6.a.

Garage

The garage was constructed in 2018, before the Decision Statement was amended to include Condition 2.9. Nonetheless, the change, the associated measures and the summary assessment of the anticipated effects are presented below. Compared to Figure 3 of the environmental assessment report, the mining equipment garage currently on the site is about 50 m farther north (see Figure 1 and Figure 2).

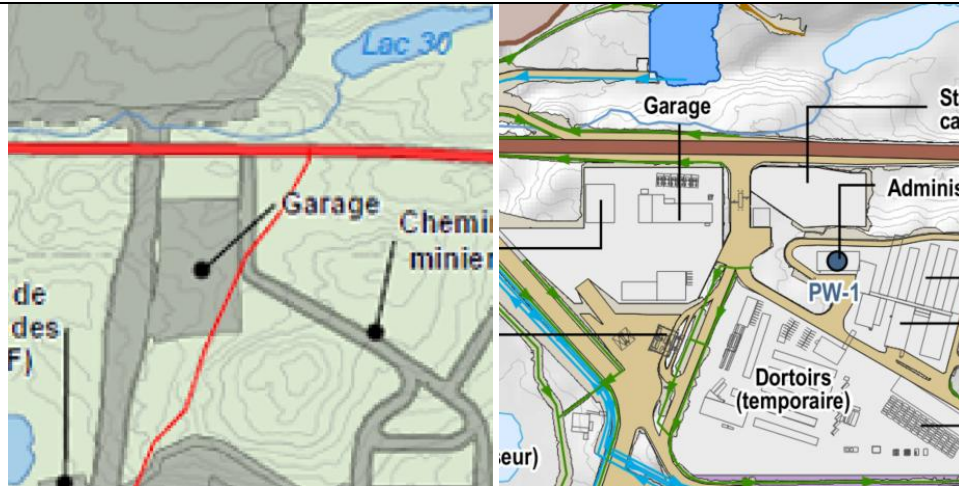


Figure 1. Moving the Garage (A: 2015, B: 2024)

Moving the garage to the north led to the anthropization of an additional surface of approximately 3650 m². However, this surface is an integral part of the safety perimeter of the mining site and thus inaccessible to the other land users. The infrastructure is also more visible to the users of Route du Nord.



Figure 2. Mining Equipment Garage – Whabouchi Site, September 2024

The anticipated effects and the proposed mitigation, surveillance and monitoring measures for the valued components are presented summarily in Table 2. It should be noted, since the construction has already been done, some partial effects have already occurred. The measures deployed during the construction work are highlighted in the table.

Table 2. Summary Assessment of the Effects Related to Moving the Garage

Moving the garage						
	Anticipated effects	Proposed mitigation, surveillance and monitoring measures	Intensity	Scope	Duration	Reversibility/Irreversibility
Valued components of the environment	Fish, fish habitat and other aquatic species					
	Surface water contamination risk	<u>Drainage and runoff water directed to settling ponds or vegetation zone located at least 20 m from water environments, retention works and control of additional sediment transport (as needed).</u> Use of a closed-circuit water-oil separator to capture the water inside the garage.	Low	Local	Medium	Reversible (Low)
	Migratory birds					
	Brightness, noise and collision risks	Application of planned measures for the noise climate and light (section 2.1.3.2 of Notice 2024), avoid performing land clearing work in critical breeding periods, raise workers' awareness, specific measures for special status species and in case of discovery of nests, Environmental and Social Monitoring Plan [ESMP] (NMX B9).	Low	Spot	Medium	Reversible (Low)
	Species at risk					
	Brightness, noise and collision risks	Application of planned measures for the noise climate and light (section 2.1.3.2 of Notice 2024), avoid performing land clearing work in critical breeding periods, raise workers' awareness, monitor the evolution of little brown bat maternity, ESMP (NMX B9).	Low	Spot	Medium	Reversible (Low)
	Current use of lands and resources for traditional purposes by Indigenous peoples					
	No apprehended effect	N.A.	N.A.	N.A.	N.A.	N.A.
	Health, Social and Economic Conditions of Indigenous Peoples					
	Surface water and groundwater contamination risk	Collection ditches and settling ponds, machinery storage and refuelling over 60 m from a wetland or water environment, inspect the machinery, provide for emergency spill kits, do not perform work in heavy rain periods, control erosion at the source, stabilize the cleared soil, stabilize and maintain the drainage ditches.	Low	Local	Medium	Reversible (Low)
Opportunity for performance of work by local companies (Chinuchi Agreement)	N.A.	N.A.	N.A.	N.A.	N.A.	
Natural and cultural heritage /Structures, places or things of historical, archaeological, paleontological or architectural importance for the Indigenous peoples						
No apprehended effect	N.A.	N.A.	N.A.	N.A.	N.A.	

Mining Road Leading to the Explosives Magazine

Compared to the route envisioned in 2015, the mining road leading to the explosives magazine has been moved to the south (see Figure 3 and Figure 4).

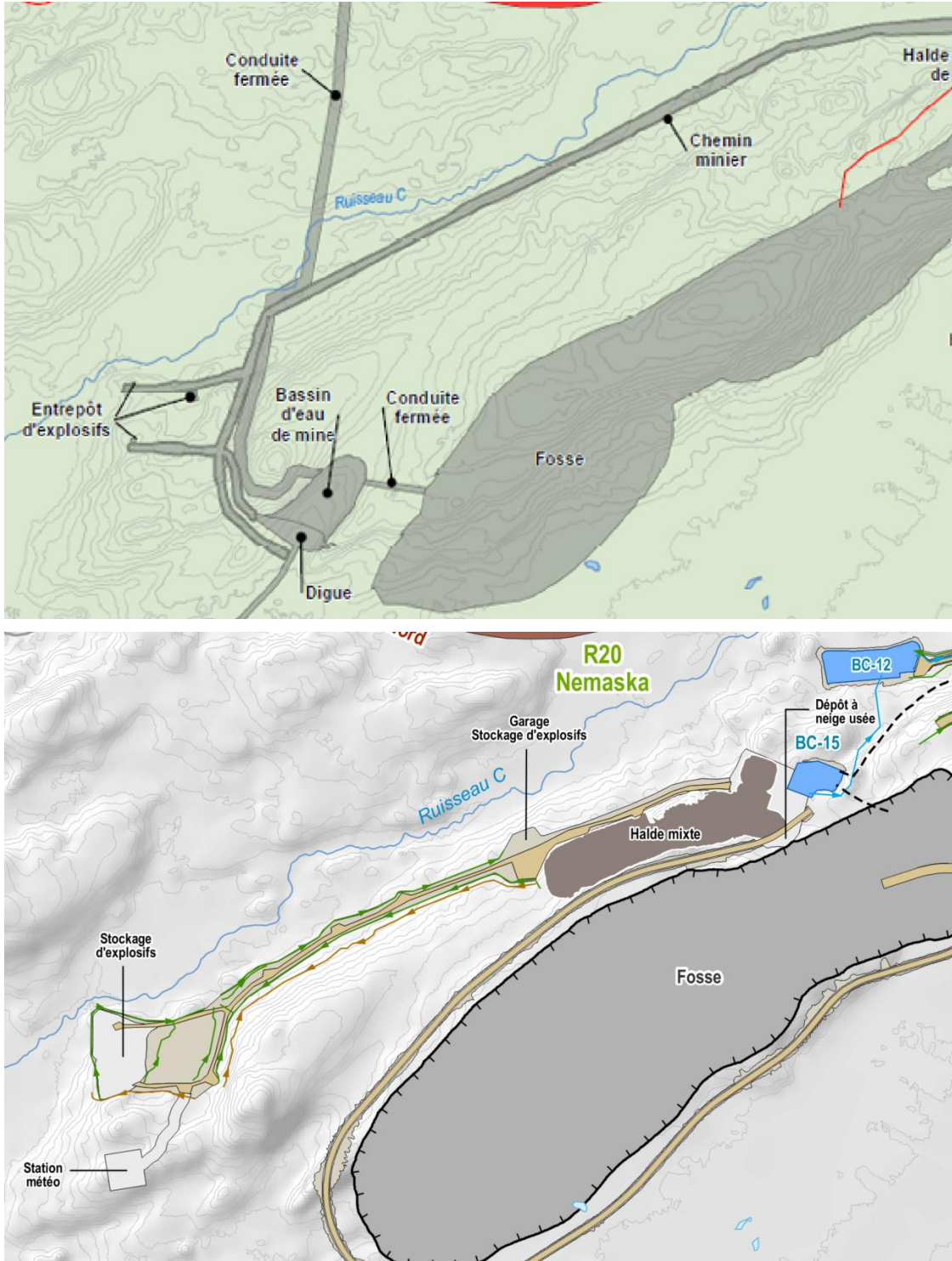


Figure 3. Moving the Mining Road Leading to the Explosives Magazine (A: 2015, B: 2024)

This modification is considered to have a positive environmental impact because it moves the mining road away from Stream C, thus reducing the potential direct and indirect effects on fish habitat. The reduction of the potential encroachment on Stream C allows better maintenance of the component's integrity. It is not anticipated that the modification of the route of the mining road leading to the explosives magazine will have significantly different effects on the other valued components in the project compared to the 2015 route.



Figure 4. Mining Road Leading to the Explosives Magazine –Whabouchi Site, September 2024

The anticipated effects and the proposed mitigation, surveillance and monitoring measures for the valued components are presented summarily in Table 2. It should be noted, since the construction has already been done, some partial effects have already occurred. The measures deployed during the construction work are highlighted in the table.

Table 3. Summary Assessment of the Effects Related to Moving the Mining Road Leading to the Explosives Magazine

Moving the mining road leading to the explosives magazine						
	Anticipated effects	Proposed mitigation, surveillance and monitoring measures	Intensity	Scope	Duration	Reversibility/Irreversibility
Valued components of the environment	Fish, fish habitat and other aquatic species					
	Surface water contamination risk	<u>Settling pond or sediment control works (as needed), machinery storage and refuelling over 60 m from a wetland or water environment, inspect the machinery, provide for emergency spill kits, do not perform work in heavy rain periods, control erosion at the source, stabilize the cleared soil, stabilize and maintain the drainage ditches.</u>	Low (positive)	Local	Medium	Reversible (low)
	Loss of area in fish habitat	Offset plan for loss of fish and fish habitats	Low (positive)	Local	Long	Partially reversible (medium)
	Migratory birds					
	Loss of forest habitats, generation of noise and light, and collision risks	Application of the planned measures for the noise climate and light (section 2.1.3.2 of Notice 24), functional and efficient mufflers, noisy daytime work, backup alarm (white noise), ESMP (NMX P2), avoid performing land clearing work in critical breeding periods, raise workers' awareness, specific measures for special status species and in case of discovery of nests, ESMP (NMX B9).	N.A.	N.A.	N.A.	N.A.
	Species at risk					
	Loss of forest habitats, generation of noise and light, and collision risks	Application of the planned measures for the noise climate and light (section 2.1.3.2 of Notice 24), avoid performing land clearing work in critical breeding periods, raise workers' awareness, monitor the evolution of little brown bat maternity, ESMP (NMX B9).	N.A.	N.A.	N.A.	N.A.
	Current use of lands and resources for traditional purposes by Indigenous peoples					
	No apprehended effect	N.A.	N.A.	N.A.	N.A.	N.A.
	Health, Social and Economic Conditions of Indigenous Peoples					
	Air quality, surface water and groundwater contamination risk	Machinery inspection and maintenance, speed limitation, watering of roads, efficient antipollution systems, ESMP (NMX P1), functional and efficient mufflers, noisy daytime work, white noise backup alarm, ESMP (NMX P2), provide for emergency spill kits.	N.A.	N.A.	N.A.	N.A.
	Natural and cultural heritage /Structures, places or things of historical, archaeological, paleontological or architectural importance for the Indigenous peoples					
No apprehended effect	N.A.	N.A.	N.A.	N.A.	N.A.	

Mining Road Leading from the Pit to the Viaduct

Compared to 2015, it is planned to separate the mining truck traffic from the rest of the traffic on the site. It is therefore planned to build a road reserved for heavy traffic farther west.

As mentioned in section 3.0 of the Notice, it is planned to install a viaduct to strengthen road safety on the outskirts of the mine site. For technical feasibility reasons, it is preferable to develop the viaduct between two high topographic points. Limited by the existing installations and the minimum slopes and widths necessary for mining truck traffic, the crossing point had to be moved west and a new road will have to be developed to access the viaduct (see Figure 5).

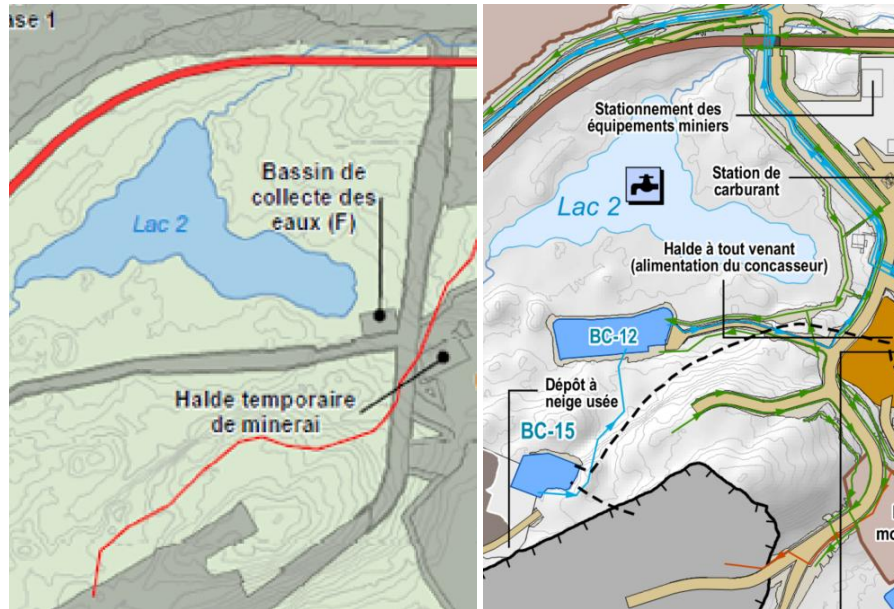


Figure 5. Moving the Mining Road Leading from the Pit to the Viaduct (A: 2015, B: 2024)

Fundamentally, the development of the mining road leading from the pit to the viaduct is essential to access the viaduct and thus to strengthen the integrity of road safety on the outskirts of the site (see Figure 6 and Figure 7). However, an additional land area estimated at 28,000 m² compared to 2015 will be necessary for development of the road. Moreover, this development will bring the installations closer to Lake 2, increasing the risks related to spills and the indirect impacts on fish habitat. The anticipated effects and the proposed mitigation, surveillance and monitoring measures for the valued components are presented summarily in Table 2.



Figure 6. Mining Road Leading from the Pit to the Viaduct – Whabouchi Site, September 2024

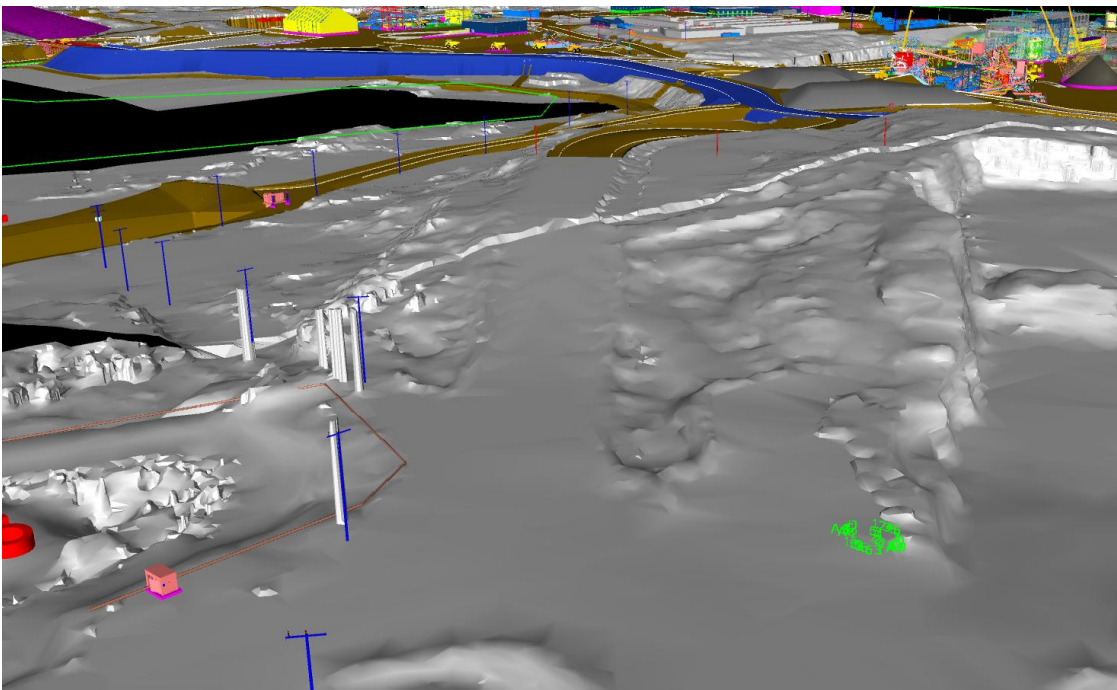


Figure 7. Mining Road Leading from the Pit to the Viaduct Planned in the Model (in Blue) – Whabouchi Model, March 2025

Table 4. Summary Assessment of the Effects Related to the Addition of the Mining Road Leading from the Pit to the Viaduct

Addition of the mining road leading from the pit to the viaduct						
	Anticipated effects	Proposed mitigation, surveillance and monitoring measures	Intensity	Scope	Duration	Reversibility/Irreversibility
Valued components of the environment	Fish, fish habitat and other aquatic species					
	Surface water contamination risk	Collection ditches and settling ponds, machinery storage and refuelling over 60 m from a wetland or water environment, inspect the machinery, provide for emergency spill kits, do not perform work in heavy rain periods, control erosion at the source, stabilize the cleared soil, stabilize and maintain the drainage ditches.	Low	Local	Medium	Reversible (low)
	Loss of area in fish habitat	Offset plan for loss of fish and fish habitats	Low	Local	Long	Partially reversible (medium)
	Migratory birds					
	Loss of forest habitats, generation of noise and light, and collision risks	Application of the planned measures for the noise climate and light (section 2.1.3.2 of Notice 24), functional and efficient mufflers, noisy daytime work, backup alarm (white noise), ESMP (NMX P2), avoid performing land clearing work in critical breeding periods, raise workers' awareness, specific measures for special status species and in case of discovery of nests, ESMP (NMX B9).	Low	Local	Medium	Reversible (low)
	Species at risk					
	Loss of forest habitats, generation of noise and light, and collision risks	Application of the planned measures for the noise climate and light (section 2.1.3.2 of Notice 24), avoid performing land clearing work in critical breeding periods, raise workers' awareness, monitor the evolution of little brown bat maternity, ESMP (NMX B9).	Low	Local	Medium	Reversible (low)
	Current use of lands and resources for traditional purposes by Indigenous peoples					
	No apprehended effect	N.A.	N.A.	N.A.	N.A.	N.A.
	Health, social and economic conditions of Indigenous peoples					
	Air quality, surface water and groundwater contamination risk	Machinery inspection and maintenance, speed limitation, watering of roads, efficient antipollution systems, ESMP (NMX P1), functional and efficient mufflers, noisy daytime work, white noise backup alarm, ESMP (NMX P2), provide for emergency spill kits.	Low	Local	Medium	Reversible (low)
	Improvement of road users' safety on the outskirts of the mine site	N.A.	High (positive)	Local	Medium	Reversible (low)
	Natural and cultural heritage /Structures, places or things of historical, archaeological, paleontological or architectural importance for the Indigenous peoples					
No apprehended effect	N.A.	N.A.	N.A.	N.A.	N.A.	

Road Loop Leading to the Concentrator

The road loop leading to the concentrator was revised for technical considerations during its implementation in 2017.

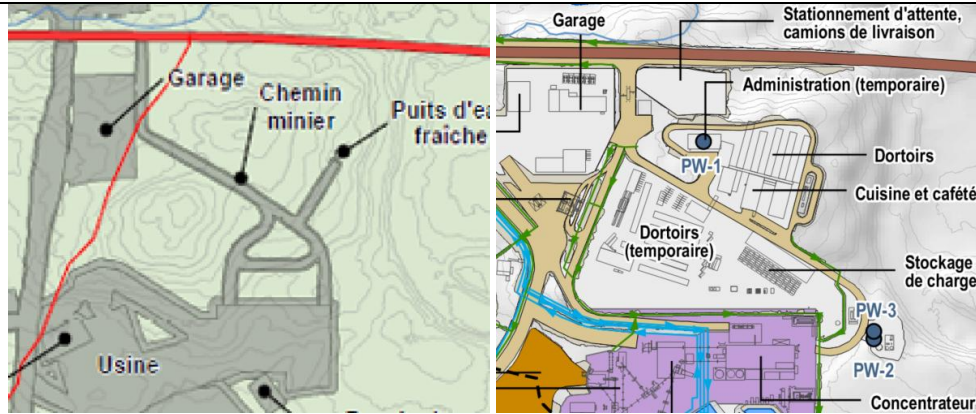


Figure 8. Road Loop Leading to the Concentrator (A: 2015, B: 2024)

Compared to the route presented in 2015, a portion of the mining road that already existed for exploration activities (in red in the left-hand image of Figure 8) was integrated into the current route. Moreover, given the topography and the slopes, as well as the minimum braking radius required for trucks transporting concentrate, the loop was lengthened about 75 m to the east (see Figure 9 and Figure 10).



Figure 9. Road Loop Leading to the Concentrator (Western Portion) –Whabouchi Site, September 2024



Figure 10. Road Loop Leading to the Concentrator (Eastern Portion) –Whabouchi Site, September 2024

The portion of the developed additional loop represents the anthropization of a surface of approximately an additional 7000 m² (including the inside of the loop). The surface in question is inside the safety perimeter of the mine and thus does not represent a loss for the other land users. However, this is a habitat loss. The modification of the roads, like all excavation work, leads to a water contamination risk. The anticipated effects and the proposed mitigation, surveillance and monitoring measures for the valued components are presented summarily in Table 5. It should be noted, since construction has already been done, that some partial effects have already occurred. The measures deployed during the construction work are highlighted in the table.

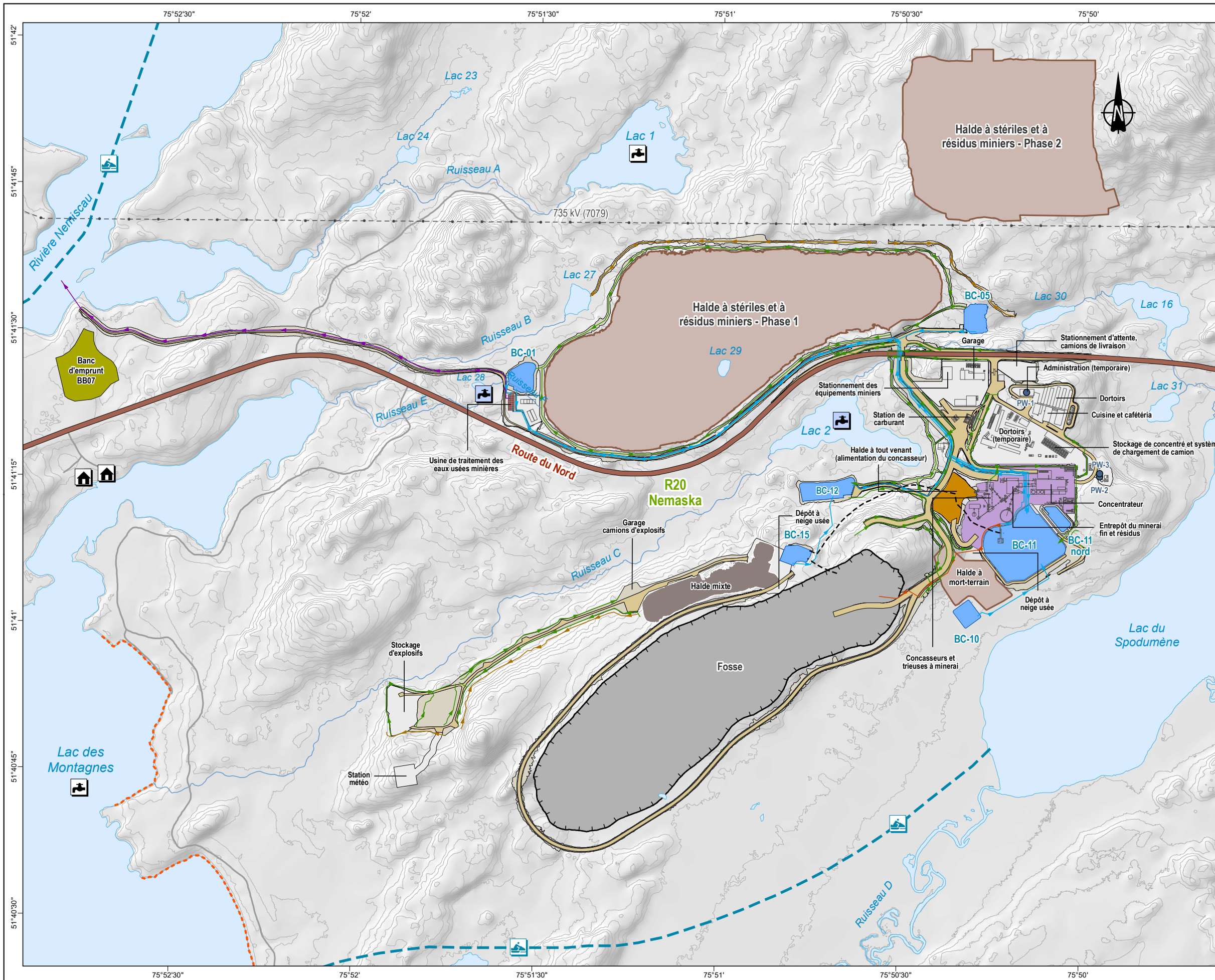
Table 5. Summary Assessment of the Effects Related to Redevelopment of the Road Loop Leading to the Concentrator

Redevelopment of the Road Loop Leading to the Concentrator						
	Anticipated effects	Proposed mitigation, surveillance and monitoring measures	Intensity	Scope	Duration	Reversibility/Irreversibility
Valued components of the environment	Fish, fish habitat and other aquatic species					
	Surface water contamination risk	<u>Settling pond or sediment control works (as needed), machinery storage and refuelling over 60 m from a wetland or water environment, inspect the machinery, provide for emergency spill kits, do not perform work in heavy rain periods, control erosion at the source, stabilize the cleared soil, stabilize and maintain the drainage ditches.</u>	Low	Local	Medium	Reversible (low)
	Loss of area in fish habitat	Offset plan for loss of fish and fish habitats	Low	Local	Long	Partially reversible (medium)
	Migratory birds					
	Loss of forest habitats, generation of noise and light, and collision risks	<u>Application of the planned measures for the noise climate and light (section 2.1.3.2 of Notice 24), functional and efficient mufflers, noisy daytime work, backup alarm (white noise), ESMP (NMX P2), avoid performing land clearing work in critical breeding periods, raise workers' awareness, specific measures for special status species and in case of discovery of nests, ESMP (NMX B9).</u>	Low	Local	Medium	Reversible (low)
	Species at risk					
	Loss of forest habitats, generation of noise and light, and collision risks	<u>Application of the planned measures for the noise climate and light (section 2.1.3.2 of Notice 24), avoid performing land clearing work in critical breeding periods, raise workers' awareness, monitor the evolution of little brown bat maternity, ESMP (NMX B9).</u>	Low	Local	Medium	Reversible (low)
	Current use of lands and resources for traditional purposes by Indigenous peoples					
	No apprehended effect	N.A.	N.A.	N.A.	N.A.	N.A.
	Health, social and economic conditions of Indigenous peoples					
Air quality, surface water and groundwater contamination risk	<u>Machinery inspection and maintenance, speed limitation, watering of roads, efficient antipollution systems, ESMP (NMX P1), functional and efficient mufflers, noisy daytime work, white noise backup alarm, ESMP (NMX P2), provide for emergency spill kits.</u>	N.A.	N.A.	N.A.	N.A.	
Natural and cultural heritage /Structures, places or things of historical, archaeological, paleontological or architectural importance for the Indigenous peoples						
No apprehended effect	N.A.	N.A.	N.A.	N.A.	N.A.	

6.b. Map 1 attached to Appendix A illustrates the new location of the components mentioned in answers 5. And 6.a.

APPENDIX A

WHABOUCI SITE DEVELOPMENT PLAN (GCM, 2025)



ÉLÉMENTS DU MILIEU

- Plan d'eau
- Cours d'eau permanent
- Route principale
- Route secondaire
- Ligne hydroélectrique

INFRASTRUCTURES DU PROJET

- Fosse
- Route
- Déblai, remblai
- Complexe usinier
- Plateforme pour les activités de support aux opérations
- Infrastructure

LIEUX DE DÉPÔT

- Lieu de dépôt définitif
- Lieu de dépôt temporaire
- Halde à tout venant (run-of-mine stockpile)
- Banc d'emprunt

GESTION DES EAUX

- Bassin de collecte
- Conduite d'eau principale
- Conduite pour la gestion des crues
- Fossé de dérivation
- Conduite pour rejet de l'effluent final
- Fossé de collecte
- Point de rejet de l'effluent final
- Conduite d'eau temporaire
- Puit d'eau souterraine
- Usine de traitement des eaux usées minières

UTILISATION DU TERRITOIRE

- Camp permanent
- Plage
- Sentier de motoneige
- Lot de piégeage
- Source d'eau potable
- Source d'eau potable historique maintenant à l'intérieur du périmètre d'exclusion de la mine



SITE MINIER WHABOUCHI
Avis de modification de projet 2024 - AEIC

Plan d'aménagement du site

Sources :
 CanVec, RNCan, 2019
 BDGA, 1/5 000 000, MRNF Québec, 2012
 Adresses Québec, MERN Québec, 2018
 Infrastructures : DRA Americas inc., 2024
 Utilisation du territoire : Norda Stelo, 2019

Projet : 22-1331-0514
 Fichier : 22-1331-0514_c1_gcm_plan_aménagement_aeic_2025-04-22.mxd

0 50 100 150 200 250 m
 Projection UTM, zone 18, NAD83