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Grand Council of the Crees (Eeyou Istchee)
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Cree Nation Government
Gouvernement de la Nation Crie

Agence d'évaluation
d'impact du Canada

Impact Assessment
Agency of Canada

January 8, 2020, Quebec City **BY EMAIL**

Gail Amyot
Galaxy Lithium (Canada) Inc.
2000 Peel Street, Suite 720
Montreal, Quebec H3A 2W5

Dear Ms. Amyot:

SUBJECT: James Bay Lithium Mine Project – Supplementary answers to the June 27, 2019, information request

On December 23, 2019, the Joint Assessment Committee (the Committee) received the supplementary answers to its June 27, 2019, information request concerning the project in question. The answers are in the following document:

WSP, 2019. *James Bay Lithium Mine Project. Answers to requests for further details concerning questions (round 1) from the Canadian Environmental Assessment Agency as part of the environmental assessment of the Project.* Report prepared for Galaxy Lithium (Canada) Inc. 82 pages, maps and appendices.

The Committee compared the information request and the answers provided. This exercise revealed that the information sent is incomplete. The answers to the questions listed below are either missing or the Committee finds that they do not reflect the information expected. It is recommended that you refer to the June 27, 2019, request for further context.

The Committee has, however, decided to continue the technical analysis of the corroborating information received to date. In order to obtain information and clarification on the information received, questions may be sent in a future information request to enable the Committee to continue the analysis of the environmental effects of the James Bay Lithium Mine Project.

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Question CEAA-6
Alternative analysis methodology—category weighting
The proponent must provide an explanation for the various considerations and weight assigned to each indicator in a category. The proponent must review its indicators if it is not possible to provide an explanation for these.

Question CEAA-19
Project Description—management of residual materials and hazardous waste
B) The proponent must specify the on-site storage capacity for each category of residual materials and hazardous waste.

Question CEAA-31
Surface water and groundwater—overall impact of the project on the quality of surface water and groundwater during the different phases of the project
A) The proponent must provide results on the project's impacts on the surface water and groundwater quality of the receiving environment caused by leaching and the risk of acid mine drainage from the ore stockpiles.

B) The proponent must include the results of the kinetic tests on the ore and the tests on the waste rock/tailings mix in its analysis of the quality of surface water and groundwater, and compare them with the *Canadian Water Quality Guideline* of the Canadian Council of Ministers of the Environment for the protection of aquatic life for the different phases of the project, as well as the standards in the *Metal and Diamond Mining Effluent Regulations* to which the mine is subject.

C) The proponent must provide all of the analytical results for the ore that show the probability of some of the apprehended impacts, including the results of the long-term kinetic tests to determine, as applicable, the time necessary to trigger mine drainage (acid and/or neutral) or leaching of metals.

D) The proponent must provide a complete study of the mobility of leachable metals and metalloids in order to predict their mobility by runoff from the waste rock stockpiles to their availability in the surface water and their ecotoxicity.

Question CEAA-42
Surface water and groundwater—information concerning the sealing measures at the bottom of the piles and contact water ditches

Since the available data indicate a potential for leaching, the proponent must provide the sealing measures at the bottom of the ore piles, including with regard to the presence of a geomembrane.

Question CEAA-44
Surface water and groundwater—service roads
The proponent must provide information about the measures identified to ensure the sealing of the ditches along the service roads, since potential leaching of metals is expected from the construction equipment coming from the quarry.

Question CEAA-50
Soils and sediments—construction materials and mapping of lithology types

A) The proponent must provide a map showing the lithology types related to the construction materials (quarries and borrow pits). The proponent may also provide this map showing the various options considered for the choice of quarries and borrow pits to be operated.

C) The proponent must provide all results of geochemical characterization and/or any other relevant characterization of the materials that will be extracted from the quarries and borrow pits in order to determine their acid drainage and/or leaching potential.

Questions CEAA-60 and CEAA-104 A)
Air and greenhouse gases—adjustment of atmospheric modelling of contaminants / toxicological risk assessment—baseline data and identification of contaminants of potential concern
A) The proponent must include emissions from generators (including their number and location), the concrete batch plant and the transportation of concentrate between the mine and Matagami in its modelling of the atmospheric dispersion of contaminants. The proponent may make these estimates on the basis of the maximum emissions from these types of equipment, infrastructure and transportation or on the basis of the worst-case scenario.

B) On the basis of the emissions estimated in A), the proponent must estimate the contribution of those components to total atmospheric emissions.

Question CEAA-133
Monitoring and follow-up programs—monitoring program
A) The proponent must provide the general outline of the environmental monitoring program.

B) The proponent must indicate, for the elements requiring monitoring specified in the program mentioned in A), the measures and means considered for carrying out such monitoring.

Next steps
The federal environmental assessment timeline will restart once the Committee has received all the requested information. The Committee will continue its technical analysis of the corroborating information. Please note that the Committee could submit another information request at a later date to clarify some answers.

If you need further information or wish to discuss the requirements of the information request and the non-compliant information, please contact Véronique Lalande at 418-455-4116 or *veronique.lalande@canada.ca*

Yours truly,

John Paul Murdoch
Co-Chair, Joint Assessment Committee
Government of the Cree Nation

Anne-Marie Gaudet
Co-Chair, Joint Assessment Committee
Impact Assessment Agency of Canada

c.c. [by email]: Brian Craik, Government of the Cree Nation
Véronique Lalande, Impact Assessment Agency of Canada
Elisabeth Gill, Impact Assessment Agency of Canada
Isabelle Vézina, Health Canada
Marie-Eve Lenghan, Natural Resources Canada
Annaïg Kervella, Fisheries and Oceans Canada
Sylvain Martin, Environment and Climate Change Canada
Catherine Gaudette, Transport Canada