

**NOTE TO THE READER**

This document was translated from the original French version. Therefore, the French version constitutes the official version.

In case of conflict of interpretation between the English and French versions, the French version prevails.

TECHNICAL NOTE

CLIENT:	Galaxy Lithium (Canada) Inc.		
PROJECT:	Baie James Lithium Mine	WSP Ref.:	201-12362-00
SUBJECT:	Commitments as part of the Environmental Impact Assessment	DATE:	29 November 2022
RECIPIENT:	Caroline Morissette, Directrice Environnement		

Since the filing of the Environmental Impact Assessment (EIA) in 2021, some mitigation measures have been modified to address questions or comments from federal or provincial authorities. The measures presented in the table below are the most up-to-date measures to which Galaxy Lithium (Canada) Inc. (hereinafter Galaxy) has committed to. In the event that the mitigation measures proposed by Galaxy address the same aspects as the conditions issued by federal authorities, the federal conditions will take precedence over Galaxy's proposed measures.



Code	Description	Phase			Reference
		Construction	Operation	Closure	
Soil Profile and Surface					
SUR 01	Mark out the boundaries of the planned earthworks, restrict the areas of deforestation and soil stripping as well as cutting areas to the footprint of the required infrastructure (road, pits, stockpiles, basin, etc.).	X		X	EIE (2021)
SUR 02	Mark out access, paths and work areas before undertaking work, and prohibit parking and movement of machinery and vehicles outside of those areas.	X		X	EIE (2021)
SUR 03	Rehabilitate creek banks disturbed by the work as early as possible to minimize erosion and sedimentation. If it is impossible to permanently stabilize disturbed surfaces before winter, implement temporary protection measures.	X			EIE (2021)
SUR 04	In watercourse crossing areas, perform deforestation work immediately before construction to minimize erosion.	X			EIE (2021)
SUR 05	Install a geomembrane on haul roads that are not on waste rock piles.	X			Technical Note (COMEX, JAC) Alternative solution [...]
SUR 06	Implement a QA/QC program during construction of the haul road, including installation of the geomembrane, as well as during operations and restoration work.	X			Technical Note (COMEX) Additional information [...]
NOR 01	Restore work areas and stockpiles by levelling surfaces, covering them with natural soils, scarifying or seeding them to support revegetation. Stabilize reworked areas, embankment slopes, overburden stockpiles, etc., as work progresses. Reference: D019 for rehabilitation phase.			X	EIE (2021)
Soil, water, and sediment quality					
QUA 01	Ensure that enough emergency kits for the recovery of petroleum products and chemicals are available in sensitive locations.	X	X	X	EIE (2021)
QUA 02	Through frequent inspections, ensure that machinery is in good working order (clean with no contaminant leaks) and that fuel and lubricant tanks are perfectly sealed. Any discovered leaks require immediate repairs to the tank in question.	X	X	X	EIE (2021)
QUA 03	The usual precautions should be taken during maintenance (draining, greasing, etc.) and refuelling of machinery on site to avoid any accidental spills.	X	X	X	EIE (2021)
QUA 04	In the case of temporary storage of contaminated excavated material, take all the necessary actions to preserve the integrity of the surrounding soil and water and ensure the safety of workers (put piles on a sealed or impermeable surface, cover piles, restrict access to these piles, etc.).	X	X	X	EIE (2021)

Code	Description	Phase			Reference
		Construction	Operation	Closure	
QUA 05	Continuously stabilize or protect exposed surfaces (revegetation) as soon as possible to reduce the transport of TSS and to limit the leaching of materials.	X			EIE (2021)
QUA 06	Establish a well system on the periphery of the mining infrastructure to measure the drawdown and the rise of the water table in the sector of the pit.	X	X		EIE (2021)
QUA 07	Carry out development work likely to alter the hydraulicity of watercourses outside the snowmelt period (April 15 to June 15).	X			EIE (2021)
QUA 08	Limit the transport of fine particles in the water environment beyond the immediate work area by an effective means (sediment traps, sediment barriers, turbidity curtain, etc.).	X	X	X	EIE (2021)
QUA 09	Build a temporary bridge for machinery if crossing a watercourse is required. Set up bridging or an ice-bridge when building a trail across a watercourse or fish habitat (ref. NOR 05).	X			EIE (2021)
QUA 10	Equip all fixed equipment containing oils and/or fuel (e.g., lighting tower, generator, crusher, sifter, etc.) located less than 60 m from a watercourse or body of water with a leakproof recovery system. Equipment must be equipped with absorbents for quick and effective response in the event of an accidental spill.	X	X	X	EIE (2021)
QUA 11	Temporary facilities (e.g. construction site trailer, access road, storage areas, waste site) must be located more than 60 m from a watercourse.	X		X	EIE (2021)
QUA 12	Any vehicle and machinery maintenance is prohibited outside the designated areas.	X	X	X	EIE (2021)
QUA 13	Refuel vehicles and machinery at designated locations in accordance with good practices.	X	X	X	EIE (2021)
QUA 14 ¹	Monitoring of well water volume and quality will be conducted for the truck stop drinking water well and drilling a new drinking water well in case drawdown of the groundwater makes the truck stop drinking water well unserviceable.		X		EIE (2021)
QUA 15	Managing the explosive plant to be zero waste: <ul style="list-style-type: none"> – Sanitary discharges will be stored in a sealed tank and disposed of outside the site; – Waste oil and other non-recyclable discharges will be disposed of outside the site by an authorized company for reclamation or disposal; – Trucks with ANFO will be cleaned inside the building and washwater will be sent to the oil-water separator then filtered and reused. 		X		EIE (2021)
QUA 16	Implement a groundwater monitoring program along haul roads.		X		COMEX 4th series, QC4-14

¹ Despite the proponent's commitment to monitor the drinking water supply at the km 381 truck stop, it appears the operation of this truck stop, including any questions related to drinking water management, is the responsibility of its owner, the SDBJ. The latter holds authorizations issued by the MELCCFP for water management at the km 381 truck stop, for which monitoring and reports are notably transmitted to the MELCCFP. The proponent will therefore not be in position to respect this commitment, as it has no right or capacity to intervene directly on the management of water, or any other element whatsoever, at the km 381 truck stop. The proponent shall ensure that it works closely with the SDBJ to ensure the quality/quantity of the drinking water at the km 381 truck stop.



Code	Description	Phase			Reference
		Construction	Operation	Closure	
QUA 17	Implement a monitoring program for phosphorus in the final effluent discharge in the CE2 as well in groundwater.		X		COMEX, 4th series, QC4-45
QUA 18	Implement a final effluent water quality monitoring program during the first five years following the mine closure, with six sampling campaigns per year.			X	JAC, 2nd series, JAC-53H
QUA 19	Implement a surface water quality monitoring program in accordance with The Fisheries act and the MDMER, including phosphorus, in which water quality results will be compared to the 2021 Environmental Discharge Objectives (EDOs), beginning in the construction phase. Appropriate corrective measures will be implemented where necessary and incorporated into the environmental management system for the operation phase. Results will be reported after 2 years of operation and every 5 years thereafter.	X	X		COMEX, 4th series, QC4-11, QC4-14 and JAC, 3rd series, JAC3-36
QUA 20	Implement a geochemical monitoring program for waste rock and tailings during operation, based on criteria of the Directive 019 (D019) as well as the material characterization procedure contained in the new <i>Guide de caractérisation des résidus miniers et du minerais</i> (Characterization Guide) issued by the MELCC in 2020.		X		COMEX, 4th series, QC4-5
QUA 21	Meet remediation criteria for soils potentially contaminated with lithium, vanadium, or titanium. The criteria for lithium are 16 mg/kg for residential land use soils and 230 mg/kg for commercial/industrial land use soils. The criteria for vanadium are 39 mg/kg for residential land use soils and 86 mg/kg for commercial/industrial land use soils. For soils containing titanium and other contaminants covered by the Land Protection and Rehabilitation Regulation (LPRR) or the lithium or vanadium response guide, it is recommended that they be managed according to the criteria or standards applicable to those other contaminants. In the case of soils containing only titanium, they can be managed according to the site-specific background levels after validation with the Ministry.			X	COMEX, 4th series, QC4-51
QUA 22	Ensure that all material imported from outside of the mine site meets certain conditions regarding their geochemical qualities (absence of metal leaching and acid generating potential).	X	X	X	JAC, 3rd series, 4.1 comment 4
NOR 02	Manage excavation waste according to their degree of contamination and in accordance with the requirements of the <i>Soil Protection and Rehabilitation of Contaminated Sites Policy</i> . Reference: Q-2, r. 37 – <i>Land Protection and Rehabilitation Regulation</i> : Schedules I and II and Response Guide – <i>Soil Protection and Contaminated Sites Rehabilitation</i> : Table 5 – Soil recovery methods authorized in Québec.	X	X	X	EIE (2021)
NOR 03	Dispose of contaminated excavation in accordance with the Contaminated Soil Management Grid set out in the <i>Guide d'intervention</i> . If disposal in the stockpile turns out to be an attracting option, Galaxy will submit an application for authorization to the Ministère and only take action after issuance of said authorization. Reference: Q-2, r. 18 – <i>Regulation respecting the burial of contaminated soils</i> : Schedule I and Guide – <i>Soil Protection and Contaminated Sites Rehabilitation</i> : Schedule 5 – Excavated soil management grid; Section 6.4.3.1 List of authorized treatment facilities.	X	X	X	EIE (2021)

Code	Description	Phase			Reference
		Construction	Operation	Closure	
NOR 04	Dispose of surplus or unusable excavation waste (clay, silt, gravel, rock) with due care and in accordance with the <i>Protection Policy for Lakeshores, Riverbanks, Littoral Zones and Floodplains</i> and D019 to ensure adequate separation from water environments.	X	X	X	EIE (2021)
NOR 05	Install culverts or crossing structures designed to maintain the free flow of water (and the free passage of fish). The construction of bridges or the installation of culverts shall not reduce the width of the watercourse by more than 20%, as measured from the natural high-water mark. The base of the lower culvert shall be driven below the natural bed of the watercourse at a depth of not less than 15 cm or 10% of the height of the structure and its ends shall extend beyond the base of the embankment by not more than 30 cm and be adequately stabilized. Reference: <i>Regulation respecting standards of forest management for forests in the domain of the State</i> .	X			EIE (2021)
NOR 06	Install a minimum of three observation wells in the selected locations around the stockpile to verify groundwater quality upstream and downstream. Reference: D019, section 2.3.2.1.		X		EIE (2021)
NOR 07	Surround mining infrastructure with ditches so that drainage and runoff waters are directed towards a basin and then treated as needed before being discharged into the environment. In addition, runoff water from outside activity areas shall be directed into drainage ditches, built around mine infrastructure to prevent these waters from sources of contamination (dilution prohibited). Reference: D019, section 2.1.5.	X	X		EIE (2021)
NOR 08	Ensure, before discharging the effluent water, that it complies with the standards. Reference: <i>Metal and Diamond Mining Effluent Regulations</i> , sec. 4 and Schedule 4 and D019, section 2.1.1.1.	X	X	X	EIE (2021)
NOR 09	In the event of an accidental spill, stop the leak as soon as it is spotted, contain the product, and recover it using suitable equipment (absorbent sheets, flanges, drain covers, etc.). Immediately notify the Minister. Excavate contaminated soil, place it in sealed containers and dispose of it in accordance with the hazardous materials management program. Advocate for quicker interventions to prevent deep infiltration. Reference: <i>Environment Quality Act, Sec. 21 and Regulation respecting hazardous materials, Sec. 9</i> .	X	X	X	EIE (2021)
NOR 10	Set aside overburden and segregate the topsoil for reuse when redeveloping disturbed areas. Reference: D019, section 2.6.	X		X	EIE (2021)



Atmosphere					
AIR 01	Regularly water roads, work areas, and stockpiles by moistening them to prevent resuspension and dust emission and keep a watering and BNQ certified dust control agent spraying logbook during the site construction and operation. The frequency and intensity of road watering will be combined to meteorological conditions and to the air quality monitoring.	X	X		EIA (2021), COMEX, 4th series, QC4-21
AIR 02	Avoid unnecessary engine idling to reduce noise and disturbances from exhaust gas, smoke, dust, or any other contaminants likely to come from the machinery.	X	X	X	EIE (2021)
AIR 03	Limit the vehicle speed on the various sites as well as for mine operations.	X	X	X	EIE (2021)
AIR 04	Instead of burning, proceed as much as possible with chipping tree removal residue and clear brush at the work site and then spread.	X			EIE (2021)
AIR 05	Instead of burning, proceed as much as possible with chipping tree removal residue and clear brush at the work site and then spread.	X	X		EIE (2021)
AIR 06	Monitor total particulate matter (TPM), breathable particulate matter (PM10), fine particulate matter (PM2.5) and crystalline silica, especially close to the truck stop, from the start of operations.		X		EIE (2021)
AIR 07	Ensure regular maintenance of the dust collectors to maintain cleaning efficiency at all times.		X		EIE (2021)
AIR 08	Submit to MELCC for approval, detailed air quality sampling specification prior to the start of the construction phase.	X			COMEX, 4th series, QC4-32
AIE 09	Implement a dust emission management plan in which the ambient air quality monitoring program proposed for the project will include ambient air quality monitoring of total particulate matter, PM10, PM2.5, crystalline silica, NO2 and selected metals. Ensure that the NO2 monitoring is conducted during the construction phase. CAAQS will be considered when managing and interpreting air quality monitoring results.	X			COMEX, 4th series, QC4-32 JAC, 3rd series, 1.1 Comment 1, JAC3-58
AIR 10	Update the air dispersion modeling in the operation phase. If modelled concentration at sensitive receptors still exceeds applicable limit values, additional mitigation measures will be evaluated and their impacts on concentrations determined through modelling.		X		COMEX, 4th series, QC4-32
AIR 11	Complete monitoring of GHG emissions by mobile sources by compiling fuel consumption of vehicles and machinery throughout the life of the project.	X	X	X	COMEX, 4th series, QC4-85
AIR 12	Follow the progression of electrifying technologies for mining equipment and use them if the option become viable as well as purchase only Tier 4 certified mobile equipment for the operation, when available.		X		JAC. 3e series, 1.1 Comment
NOR 11	Ensure that vehicle and machinery exhaust systems are in good condition and function optimally to minimize contaminant emissions into the air and ensure that the same is true for dust control systems for equipment and machines that are equipped. Reference: <i>Clean Air Regulation</i> , Sec.6.	X	X	X	EIE (2021)

Artificial light at night					
LUM 01	Restrict the emission of light toward the sky using fixtures that produce a sober and uniform lighting that would meet the real lighting needs with a luminous flux that would be directed toward the surface to be illuminated.		X		EIE (2021)
LUM 02	Limit the period and duration of the use of the lights at night.		X		EIE (2021)
LUM 03	Install fixed lights to avoid light spilling out of the areas to illuminate and pay attention to the orientation of portable lights and lighting from mobile sources.	X	X		EIE (2021)
Ambient noise					
SON 01	Ensure that motorized equipment (trucks, loaders, bulldozers, backhoes, etc.) are equipped with efficient silencers and are in good condition.	X	X	X	EIE (2021)
SON 02	Inspect regularly machinery to make sure exhaust systems are in good condition to minimize noise emissions.	X	X	X	EIE (2021)
SON 03	Develop a mound with waste rock at the south perimeter of the east waste rock and tailings storage facility (WRTSF) to have a shielding effect between mobile equipment circulating at the top of the WRTSF and ruck stop at km381. This mound will evolve with the elevation of the WRTSF.		X		EIE (2021)
NOR 12	The reference noise level of a fixed source associated with a mining activity shall be assessed in accordance with the requirements of Instruction Note 98-01. Reference: D019, section 2.4.1.	X	X		EIE (2021)
Vibrations and overpressure					
VIB 01	Notify all employees and the public in the vicinity about the blasting schedule.	X	X		EIE (2021)
VIB 02	For blasting activities, maintain a maximum of 4 holes exploding in 8 ms to ensure compliance with the vibration criteria of D019.	X	X		EIE (2021)
VIB 03	To limit air overpressure, perform blasting activities in the absence of thermal inversion and carrier wind, when activities will be carried out within 800 m of the km 381 truck stop.	X	X		EIE (2021)
VIB 04	Use blasting mats and a collar height of at least 5 m when the blasting will be carried out within 500 m of the km 381 truck stop and the James Bay road, to limit rock projections.	X	X		EIE (2021)
VIB 05	Implement a self-noise and vibration monitoring system during blasting operations.	X	X		EIE (2021)
NOR 13	Comply with the maximum distances and loads during blasting to adhere to the criteria of D019 and the threshold guidelines regarding the use of explosives in or near Canadian fisheries waters. Reference: D019, section 2.4.2 and Fisheries Act, para. 35(2) and Guidelines for the use of explosives in or near Canadian fisheries waters, p. 6, paragraphs 8 and 9.	X	X		EIE (2021)
Vegetation and wetlands					
VEG 01	Carry out tree clearing to direct their fall into the areas to be cleared. Do not leave any logging residues in watercourses and areas not affected by the work.	X			EIE (2021)



VEG 02	Choose native plant species suitable for mine site rehabilitation and appropriate to the hardiness zone.	X		X	EIE (2021)
VEG 03	To prevent the introduction of invasive alien plant species (IAPs), clean the excavation machinery or vessels before using them on site.	X	X	X	EIE (2021)
VEG 04	Recover tree species with commercial value, recover other types of wood by chipping them and using them to condition soil.	X			EIE (2021)
VEG 06	Annually validate potential introduction or non-introduction of IAPs up to two years after completion of work and one year after restoration, and promptly eradicate, to the extent possible, any new IAPs occurrence observed.		X	X	EIE (2021)
VEG 07	Implement an annual program to monitor the quality of the plants used by the Cree community as traditional food.		X		JAC, 2nd series, JAC-18
VEG 08	Conduct a monitoring of the water table level in the peat by installing surface wells and piezometers, as the water table has a direct influence on peatland plants. Those wells will be in addition to those already planned for the hydrogeological component and will document the effect of groundwater drawdown in the underlying mineral substrate on water levels in the bogs. The vegetation and wetland monitoring system will be set up prior to the start of construction. Water table measurements will be taken annually while vegetation surveys will be completed at five-years intervals during the operation phase. Follow-up will be conducted annually after the mine closure for a period of five years.	X	X	X	JAC, 3rd series, JAC3-50
NOR 14	Maintain a riparian protection area of 10 to 15 m, depending on the side slope, around wetlands, watercourses, and waterbodies. Reference: Protection Policy for Lakeshores, Riverbanks, Littoral Zones and Floodplains, Sec. 3.1 and 3.2.	X			EIE (2021)
NOR 15	Develop a compensation project for the loss of wetlands. Reference: <i>Act respecting compensation measures for the carrying out of projects affecting wetlands or bodies of water, Sec. 2.</i>	X			EIE (2021)
Fauna					
FAU 01	Perform work in the water during the low-risk period, from July 1st to August 31st for brook trout and from July 15th to April 15th for northern pike.	X			EIE (2021)
FAU 02	Deforestation activities between May 1st and August 15th are prohibited or limited to minimise impacts on fauna during key nesting periods.	X			EIE (2021)
FAU 03	Identify and report areas with the highest risk of collision with large mammals through adequate signage.	X	X		EIE (2021)
FAU 04	Prior to the demolishing a building or other facility, carry out an inspection (concealed spaces) to verify its possible use as maternity or dwelling place by bats. Where appropriate, protective measures will be taken to ensure the survival of bats.			X	EIE (2021)
FAU 05	Ensure workers are aware that it is important not to feed animals and not to leave food lying around so as not to attract wildlife near work areas.	X	X	X	EIE (2021)

FAU 06 ²	Provide scare measures in the event of bird use of water management ponds. Implement measures to prevent the use of water management basins by migratory birds or birds species at risk.		X		Modification following discussion with federal authorities
FAU 07	Limit use of borrow pits as nesting site for birds by smoothing the slope and using scare tactics. If nesting does occur, create an area prohibited for operation until nesting is complete.	X	X		EIE (2021)
FAU 08	Implement a five-year program to monitor the quality of game meat likely to be consumed by the Cree community.		X		JAC, 2nd series, JAC-18
FAU 09	Create a joint working table to discuss the potential monitoring of caribou, even though the probability of caribou frequenting the area even prior to the construction of the project is very low.		X		JAC, 2nd series, JAC-12A
FAU 10	Limit wildlife access to food waste by the implementation of a composter, and by installing lids on garbage cans.	X	X		EIE (2021)
NOR 16	Develop a compensation project for the loss of fish habitat. Reference: <i>Act respecting the conservation and development of wildlife</i> , Chapter IV.1; <i>Lignes directrices pour la conservation des habitats fauniques</i> ; <i>Fisheries Act</i> , Sec. 35(2)b and <i>Metal and Diamond Mining Effluent Regulations</i> , Sec. 27.1 (if deposit of deleterious substances into fish habitat).	X			EIE (2021)
Use of land for traditional purposes					
UTT 01	Ensure workers are aware of traditional practices of Indigenous communities and activities of Indigenous users of the territory. Make drivers aware of the presence of land users near the Billy-Diamond Highway through training, awareness campaigns and warnings.	X	X	X	Modification following discussion with federal authorities and First Nations
UTT 02	Establish and maintain a communication plan to inform the public, users, and municipal authorities about the start and progress of work.	X			EIE (2021)
UTT 03	Conduct beaver dam inspections at regular intervals to identify any changes to the CE2 water level and flow and notify the community of these changes.		X		EIE (2021)
UTT 04	Prohibit hunting, recreational fishing and trapping for workers at the mine site, with a clause in the contract, and appropriate disciplinary measures.	X	X	X	EIE (2021)
UTT 05	Provide a fund in the IBA with the Cree community of Eastmain to finance intergenerational traditional knowledge initiatives.		X		EIE (2021)

² The preliminary advice from ECCC is that birds should not be scared, even before the start of the nesting season, as this could lead to adverse effects on migratory birds and birds at risk. Therefore, the measure was modified while maintaining the objective of the measure, which is to avoid the use of the water management ponds by birds.

UTT 06	<p>Encourage activities, such as stopping production and doing care and maintenance for roughly 10 days, that limit wildlife disturbance and road traffic during goose hunting season, as well as facilitating the practice of traditional activities for Cree workers.</p> <p>The measure was modified by the following measures:</p> <ul style="list-style-type: none"> – Reduce waste rock handling on site by 30% for 2 weeks during the goose and moose hunting seasons. – Reduce the number of blasts of 3 per week to 1 per 5 days, for 3 weeks during the goose hunting period – Do the blasting between 1 PM and 3 PM during the day to avoid hunting hours. – Schedule the blasting, when possible, on a day in the week when forecasted weather conditions are not conducive to goose hunting (i.e., when the wind is coming from the north). – Reduce the transport of concentrate on the Billy-Diamond Road to 8 trucks per day (16 round trips) for 2 weeks during the goose hunting period and 2 weeks during the moose hunting period. 		X		Modification following discussion with federal authorities and First Nations
UTT 07	Work in partnership with SDBJ to identify camps/trails along the Billy-Diamond Road between Matagami and km 382 by the installation of signs marking their presence and therefore sensitize truckers to the use of the road.	X	X	X	Modification following discussion with federal authorities and First Nations
Infrastructure					
CIR 01	Establish a traffic management plan, including the addition of appropriate signage in specific areas, indicating speed limits to follow, and snowmobile and ATV crossings.	X	X	X	EIE (2021)
CIR 02	Secure mine infrastructure at risk for land users by adding fencing.	X	X		EIE (2021)
CIR 03	Maintain at all times public routes free of any obstruction of debris, waste, dirt, sediment, etc.	X	X	X	EIE (2021)
CIR 04	Establish, together with the Tallyman, an area closed to traditional activities for security purposes.	X	X		EIE (2021)
CIR 05	Limit traffic of machinery to work areas.	X		X	EIE (2021)
CIR 06	Prohibit access to the mine site in the event that mining operations are temporarily suspended.	X	X		EIE (2021)
CIR 07	Install a protection berm around the pit to ensure the safety of land users at the end of the project, in accordance with the section 4.5.2 of the Guide for the Preparation of a Mine Site Rehabilitation and Restoration Plan in Quebec (MERN, 2017).			X	EIE (2021)

CIR 08	Train truck drivers appropriately and confirm that they have a valid license, are qualified and have followed the applicable training programs. Train drivers assigned to the transport of hazardous materials (THM) on the transport of such materials. All drivers will also be warned about the risks of using Billy Diamond Road, Cree use of territory in the vicinity of the road, and the risk associated with winter driving and night driving. Drivers will have to comply with the applicable limit regarding hours spent driving. Conduct quarterly driver training and meetings to discuss driver safety, awareness, and sensitive areas.	X	X	X	EIE (2021)
CIR 09	Install tachograph in the trucks carrying the concentrate.	X	X	X	EIE (2021)
CIR 10	Keep a register of drivers' training records.	X	X	X	EIE (2021)
CIR 11	Complete routine inspection for validation of the state of the vehicle before taking the road. Trucks shall have adequate lighting and clean windows and mirrors and be maintained in such a way that they allow unobstructed vision. Records will be kept of inspections.	X	X	X	EIE (2021)
CIR 12	Consider weather conditions before leaving or going to project site.	X	X	X	EIE (2021)
CIR 13	Develop procedures for the proper management of truck breakdown on the road.	X	X	X	EIE (2021)
CIR 14	Establish a protocol for radio communication between drivers, site and shipment yard.		X		EIE (2021)
CIR 15	Monitor any accidents along the highway in order to see if there is recurrence, to validate and determine problems, if any, and to propose corrective measures. Record all problems encountered on the road in the mine's global incident management log.	X	X	X	EIE (2021)
CIR 16	Avoid any animal intrusion into the container space for the management of RM (residual materials). The management of residual materials that may attract animals will therefore be conducted as to prevent the intrusion of animals in the container area. The container will be equipped with a bear-proof skip.		X		Change made following internal discussions
CIR 17	Widen Billy-Diamond Road to include a turn lane to ensure safe entry and exit from the site.	X			COMEX, 4th series, QC4-76
CIR 18	Raise awareness to all subcontractors, suppliers, contractors, and employees to drive safely and to follow traffic law.	X	X	X	COMEX, 4th series, QC4-76
CIR 19	Prohibit night traffic except for emergencies.		X		COMEX, 4th series, QC4-76
CIR 20	Maintain a record of wildlife sightings along Billy-Diamond Road (km 0 to 382) and of wildlife incidents. Propose corrective measures in the event of recurrence of wildlife incidents.		X		COMEX, 4th series, QC4-81
CIR 21	Implement a communication system to notify truck drivers of any sightings or signs of caribous on the road near the mine's area of influence and on the James Bay Road. If the wildlife protection officers, in collaboration with GLCI, judge that there is a risk to a caribou present in the area of the mine or the ore transport road, GLCI will propose adjustments to its operations.		X		JAC, 2nd series, JAC-12A
CIR 22	Incorporate a boreal caribou module in the employee and subcontractors training to prevent potential collisions.	X	X	X	JAC, 2nd series, JAC-12A



INFR 01	Develop a monitoring program for the mine pit walls, waste rock and tailing storage facilities (WRTSFs), the overburden and peat storage facility (OPSF) and the water management ponds. This program is planned for the operation phase and will include monitoring by visual inspections and instrumentation.		X		COMEX, 4th series, QC4-82
INFR 02	Implement a geotechnical monitoring program for the waste rock and tailings storage facilities for the period of mining operations, as per section 2.9.3.3 of Directive 019. This monitoring program will be submitted no later than the first application for environmental authorization under section 22 of the Environmental Quality Act for the construction of the mine site. The results of this monitoring will be presented as part of the annual environmental monitoring report.	X	X		COMEX, 4th series, QC4-83
Perception of physical environment					
PER 01	Have monitoring and environment quality monitoring reports available annually on a website dedicated to this purpose and present them to the tallymen if they so desire.	X	X		EIE (2021)
Quality of life					
VIE 01	Establish an ongoing dialogue with the public through an internal community relations group and communication program.		X		EIE (2021)
VIE 02	Establish and implement a code of ethics and ensure that all workers are well informed of its content.	X	X	X	EIE (2021)
VIE 03	Prohibit alcohol and drug consumption in the worker camp at the site.	X	X	X	EIE (2021)
VIE 04	Offer healthy and balanced menus (low in sugar and trans fat) in the worker camp's cafeteria.	X	X	X	EIE (2021)
VIE 05	Establish with the representatives of the Cree community an annual calendar of the main traditional activities and set time slots for production stoppages based on their participation in these activities. Accept days off requests during traditional activity periods.		X		EIE (2021)
VIE 06	Prohibit all forms of video lottery and money game at the site.	X	X	X	EIE (2021)
VIE 07	In collaboration with the Community liaison officer and the CBHSSJB, implementation by Galaxy's human resources department of a social issue awareness program for workers, including sexual harassment, prostitution, alcohol and drug use, gambling, financial management, violence and any other issue that may arise during mine operation.	X	X		EIE (2021)
VIE 08	Offer suitable working conditions for pregnant women by complying with the Commission de la santé et de la sécurité du travail's (CNESST) "For a Safe Maternity Experience" program.	X	X		EIE (2021)
VIE 09	Provide STBBI testing services to workers and their families, in collaboration with the CBHSSJB.	X	X		EIE (2021)
VIE 10	Ensure that telephone and/or Internet services are available at the camp to encourage workers to contact their families.	X	X		EIE (2021)
VIE 11	Authorize family visits for workers staying on the mining site during special holidays.	X	X		EIE (2021)
VIE 12	Have zero tolerance for violence at the workers camp and on site, with disciplinary measures imposed if found guilty of harassment or violence.	X	X		EIE (2021)

VIE 13	Reserve a section of the workers' camp for women to protect their privacy.	X	X		EIE (2021)
VIE 14	Have at least one woman present at the camp on Galaxy's human resources team to facilitate discussions with Cree and non-Cree female workers.	X	X		EIE (2021)
VIE 15	Implement a system for the reception and handling of complaints prior to the commencement of construction work and maintain this program until the mine closure period. A report on the nature of the complaints received by Galaxy and how they were handled will be presented to the members of the monitoring committee at each of its meetings. The web form will be posted on the community's Facebook page and forwarded to the IAAC, which will forward it to Health Canada and all other interested federal authorities.	X	X	X	EIA (2021) and JAC, 3rd series, JAC3-22
VIE 16	Maintain good relations between Galaxy and local Cree communities.	X	X	X	EIE (2021)
VIE 17	Avoid wasting food and materials at the mine and propose the excess, if any, to local Cree aid groups through the Environment Committee.	X	X	X	EIE (2021)
VIE 18	At the request of and in collaboration with the Council of the Eastmain Nation, a recognition ceremony will be held at the future mine site before construction begins.	X			EIE (2021)
VIE 19	Per the rules and regulations of the km 381 Truck stop and Galaxy's policies, there will be no tolerance for prostitution; the truck stop will request police intervention if a case is reported.	X	X		EIE (2021)
VIE 20	Record of cases involving calls to police on Galaxy employees and subcontractors' files by Galaxy's human resources department.	X	X		EIE (2021)
VIE 21	Inclusion of terms and conditions regarding hours and benefits of Cree workers in the Impact and Benefit Agreement (IBA) with the Cree Nation of Eastmain.	X	X		ÉIE (2021)
VIE 22	Formation of a monitoring committee, with invitations being offered to representatives of the communities of Eastmain and Waskaganish, Waswanipi, the Eeyou Istchee James Bay government and RE1, RE2, RE3, VC33, VC35 and R08 tallymen. Tallymen holding traplines north of Eastmain River will be invited to sit at the monitoring committee and other committees if they deem it relevant. This committee will be created in response to the Mining Act, section V, art. 101.0.3.	X	X		Email sent to Guillaume Clément-Mathieu (JAC) June 3rd
VIE 23	Ensure that a health clinic will be available on SDBJ's camp site as soon as construction begins. Develop, update as needed, and adapt according to project activities, the emergency and crisis response plan.	X	X	X	COMEX, 4th series, QC4-66
Local and regional economy					
ELR 01	Establish a regional purchasing policy that would prioritize local and regional companies in the competitive bidding process where the skill and price are competitive.	X	X	X	EIE (2021)
ELR 02	Offer training programs to local workers, when possible, to fill positions at the mine. Organize training programs in partnership with HRDC so that Cree workers can have access to jobs at the mine.	X	X		EIE (2021)
ELR 03	Prioritize the Cree workers, then the regional workforce, of equal skills, for job positions to fill.	X	X		EIE (2021)
ELR 04	Develop a memorandum of understanding and partnership agreement for Indigenous participation in the project (Impact and Benefit Agreement).	X	X		EIE (2021)



ELR 05	Implement mechanisms to integrate workers, particularly for members of Indigenous communities (information sessions, human resources representatives, employee assistance program, etc.).	X	X		EIE (2021)
ELR 06	A communication committee and Galaxy's human resources department will communicate with local stakeholders and visit schools to inform them on the positions to be filled at the mine.	X	X		EIE (2021)
ELR 07	Regularly update forecasts regarding the duration of operations and announce in advance the closure of the mine.		X		EIE (2021)
ELR 08	Develop a Workforce Adjustment Committee and an Employee Assistance Program to provide closure transition support (e.g., reclassification assistance committee for workers).		X	X	EIA (2021) JAC, 3rd series, JAC3-53
ELR 09	Participate in a Spinoff Optimization Committee (COMAX).	X	X		EIE (2021)
ELR 10	Working with the Cree Nation of Eastmain to ensure the greatest number of Cree hires.	X	X		EIE (2021)
ELR 11	Train recruiters and managers to recognize stereotypes and unconscious bias about the type of work women can do, namely in non-traditional roles.	X	X		EIE (2021)
ELR 12	Adhere to a process focused on meritocracy from the CV screening phase through selection process and to final offers.	X	X		EIE (2021)
ELR 13	When possible, offer flexibility in the time and location of training offered to access a job.	X	X		EIE (2021)
ELR 14	Provide development for women focusing on specific skills such as influencing and networking. Provide specialized on-site training and development sessions. Offer opportunities for women to network for information sharing and support.	X	X		EIE (2021)
ELR 15	In addition to the mine, there will be supporting positions offered in the community of Eastmain, in an effort to keep women closer to their families.	X	X		EIE (2021)
ELR 16	Submit to the MELCC a detailed program for monitoring the impacts on the human environment, which will include monitoring the impact on training, employment and the economy of regional communities.	X	X		EIE (2021)
ELR 17	Encourage training and employment for young people by presenting in schools (high schools and CEGEP) in the region, in collaboration with the schools and the relevant school boards. Galaxy will inform students of all the job opportunities in the mining sector available with a diploma. To do this, posters presenting job opportunities at the Galaxy mine will be hung in schools and public buildings, and career days will be organized in schools with different types of workers in the mining sector. Guided tours of the mine will also be offered to local students.	X	X		EIE (2021)
ELR 18	Hire a Cree Community Liaison Officer during all project phases. Its role will be to inform the Cree population of jobs and contracts offered by the company, to ensure Cree workers are successfully integrated with other mine site workers, share the concerns of the Cree population with the company, including territory users, and help resolve conflicts	X	X	X	EIE (2021)

ELR 19	Establish an implementation committee of the Impact and Benefit Agreement (IBA) and file an annual report of the committee's activities and make it public. The content of the annual report will be defined in partnership with the members of this committee. This committee oversees the Environment and Communications subcommittees.	X	X		JAC, 3rd series, JAC3-53
Heritage and archaeology					
ARC 01	Ensure workers are aware of the obligations regarding fortuitous archaeological discoveries.	X	X		EIE (2021)
ARC 02	Notify the RE2 trapline tallyman, the Eastmain Nation council, and the Cree Nation Government's Culture and Language Department upon discovery of artefacts.	X	X		EIE (2021)
ARC 03	Maintain exchanges with the Cree Nation Government project managers to ensure that the terminology used for watercourses and places is the same as that of authorities and Cree population.	X			JAC, 3rd series, JAC3-56
NOR 17	Report to the officials of the various building sites any fortuitous discovery and halt work at the location of the discovery until it can be fully assessed. Officials must notify the Minister of it without delay. Obtain formal authorization from these officials before resuming work. Reference: <i>Cultural Heritage Act</i> , Sec. 74.	X	X		EIE (2021)
NOR 18	Have any archaeological site discovered assessed, by a professional, to determine the extent of work required (e.g., excavation) to protect archaeological discoveries. Reference: <i>Cultural Heritage Act</i> , Sec. 76.	X	X		EIE (2021)
NOR 19	Obtain an archaeological research permit to conduct any excavations or surveys of the property or archaeological sites. Reference: <i>Cultural Heritage Act</i> , Sec. 68.	X			EIE (2021)
Landscape					
PAY 01	Model the top of the waste rock stockpile to round it and integrate it into the landscape.			X	EIE (2021)



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