

Summary of Issues

Shaakichiuwaanaan Mining Project

Table I – Issues to Inform the Impact Assessment Agency of Canada’s Decision on Whether an Impact Assessment is Required

The Shaakichiuwaanaan Mining Project (the Project) is being assessed by a Joint Assessment Committee (the Committee) composed of the Impact Assessment Agency of Canada (IAAC) and the Cree Nation Government (CNG). Table I summarizes the key questions related to information that will support decision-making on whether an impact assessment is required for the Project under section 16 of the *Impact Assessment Act*. These issues, which fall under federal jurisdiction, were submitted to the Committee during the public comment period on the Summary of the Initial Project Description presented by Patriot Battery Metals (the Proponent). The original issues as submitted are available online on the Canadian Impact Assessment Registry Internet site for the Project (reference number 89271).

The Proponent must provide the Committee with a response indicating how they intend to address the issues listed in the table below. The response must be detailed enough to inform the decision on whether an impact assessment is required for the Project.

Issues
Indigenous Peoples’ Health, Social and Economic Conditions
Briefly describe the potential effects of changes in water quality (groundwater and surface water) on the health of Indigenous peoples due to the presence of contaminants, including arsenic.
Indigenous Peoples’ Rights
Briefly describe the potential impacts of the Project on the rights of the Indigenous peoples of Canada, as recognized and affirmed by section 35 of the <i>Constitution Act, 1982</i> , particularly resulting from the potential effects of the Project on navigation and the partial diversion of Lake 01. Briefly describe the proposed mitigation measures to address these impacts.
Indigenous Peoples’ Current Use of Lands and Resources for Traditional Purposes
Provide information regarding Indigenous peoples’ current use of lands and resources for traditional purposes at or near the Project site and describe the potential effects of the Project on this use (e.g. medicinal plants, food security, wild game, berries, potable water, spiritual practices), including effects related to environmental contaminant emissions (e.g. air, soil, water, and traditional food) and the cumulative effects on health. The perception of contamination could impact the practice of traditional activities.

Table II – Other Comments, Advice, and Recommendations

The Committee is providing the following table for consideration by the Proponent. Table II includes other comments, advice and recommendations received from participants on the Summary of the Initial Project Description. The issues in Table II may relate to areas of federal jurisdiction; however, the Committee is of the view that they are not necessary to inform its determination on whether an impact assessment is required. The issues below will be considered should an impact assessment be required. The Proponent can respond to the following comments as part of its response to the Summary of Issues (Table I), noting that any responses may support the tailoring of the guidelines related to the Impact Statement Guidelines and other Planning phase documents, as appropriate. The Committee encourages the Proponent to review and consider all original participant comments available online on the Canadian Impact Assessment Registry Web site for the Project (reference number 89271).

Issues
Activities, Project Design and Alternative Means
It is important to provide information on the possibility of backfilling the pit with mine waste.
Indigenous Peoples' Health, Social, and Economic Conditions
There are concerns about the safety of Indigenous women and the opening of the territory, potentially increasing the risks of human trafficking and drug trafficking.
There are concerns about the psychosocial and mental health effects triggered by the start of the Project's impact assessment process. The Project may raise expectations, but also concerns, stress, anxiety, emotional distress, and differing perceptions within the communities.
Cumulative Effects
There are concerns about the cumulative environmental, social, health, and economic effects on the physical and cultural heritage of Indigenous peoples, on Indigenous peoples' current use of lands and resources for traditional purposes, including the food security of the Cree (e.g. altered lands, reduced access to bodies of water due to perceived or proven contamination, etc.) and the cumulative social aspect. This includes the potential cumulative effects of past, present, and reasonably foreseeable projects near the Project (e.g. Adina mining project). The Project is likely to revive the historical traumas caused by the contamination of bodies of water with methylmercury, the many lands that were flooded for hydroelectric projects, and the forced relocation of a thousand Cree, who were required to leave Fort George Island to settle in the new village of Chisasibi to allow for construction of the La Grande-1 dam.
There are concerns about the cumulative effects related to the possibility that trucking may eventually use the road infrastructure to be built as part of the Adina mining project to reach Chibougamau.
Permits and Authorizations
It is important to consult Transport Canada, particularly the navigation protection team, concerning the applicability of the <i>Canadian Navigable Waters Act</i> . Indigenous traditional practices must be considered in determining the navigability of a body of water or water course.
It is important to consult Environment and Climate Change Canada concerning the <i>Metal and Diamond Mining Effluent Regulations</i> , the <i>Migratory Birds Regulations</i> , the <i>Migratory Birds Convention Act, 1994</i> , the <i>Species at Risk Act</i> , and the <i>Fisheries Act</i> .
It is important to consult Fisheries and Oceans Canada, including concerning the <i>Invasive Aquatic Species Regulations</i> , the <i>Metal and Diamond Mining Effluent Regulations</i> , the <i>Fisheries Act</i> , and the <i>Species at Risk Act</i> .

Fish and Fish Habitat
It is important to provide additional information regarding the release of harmful substances, ¹ such as metal leaching and acid mine drainage, on the quality of surface water and groundwater in the surrounding bodies of water and/or those in contact with the site, including elevated levels of arsenic and acid production. Provide additional information regarding the control or management of these hazardous materials, particularly on the treatment of effluents that may contain, among other things, suspended solids, hydrocarbons, blasting products, contaminants from mine drainage, and metal leaching.
It is important to provide additional information on the development of mining infrastructure and other necessary infrastructure, including the diversion of Lake 01 and the construction of dikes. Describe encroachments, changes to hydrology, changes to hydrogeology, their combined effects, changes to physicochemical parameters, sedimentology and their potential effects on the quality of surface water, groundwater, and sediments.
It is important to provide additional information on the presence of lake sturgeon ² in the water courses and bodies of water that may be affected, as well as potentially affected habitats that may be used by these species.
It is important to provide details on the fish relocation plan related to the partial diversion of Lake 01 and, as applicable, whether the Project's potential effects on fish and habitat include fish mortality.
It is important to provide additional information on the mitigation measures, monitoring and follow-up programs that will be implemented to address the effects on fish and fish habitat, including the development of a fish habitat compensation plan and measures related to the introduction of invasive aquatic species.
Indigenous Peoples' Current Use of Lands and Resources for Traditional Purposes
It is important to describe how the Project aligns with established priorities or strategies in relation to the affected Indigenous communities' current use of lands and resources for traditional purposes.
It is important to describe the potential effects of the Project on culturally significant species, including boreal caribou, ³ migratory caribou, ⁴ lake sturgeon, ⁵ moose, bear, beaver and Canada goose.
It is important to consider the development of additional mitigation measures, in consultation with Indigenous peoples, to ensure that the Project's effects on wildlife are minimized, including habitat restoration to compensate for habitat loss, restoration using native plants and wildlife monitoring.
Miscellaneous (Other factors deemed relevant by the Committee)
There are concerns about: <ul style="list-style-type: none"> - The potential for expansion of the Project at site CV13 to the west and site CV9 to the east, both offering potential for additional resources; - Social acceptability and the representation of Indigenous peoples; - The current international economic context and the possibility that this may lead to delays.

¹ From: overburden, tailings, materials from borrow pits or extracted from the site, low-grade ore, ore, waste produced on the mining site and representative mixtures of the co-disposal of tailings and waste, including tantalum.

²⁻⁴⁻⁵ Species at risk under the Committee on the Status of Endangered Wildlife in Canada (COSEWIC).

³ Threatened species under the *Species at Risk Act* (range QC-6).