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Comité consultatif de l'environnement Kativik  
Kativik Environmental Advisory Committee

February 25, 2016

Christyne Tremblay  
Provincial Administrator- James Bay  
and Northern Quebec Agreement  
Édifce Marie-Guyart, 30th Floor  
675 boul. René-Lévesque East  
Québec City, QC  
G1R 5V7

**Subject: Environmental assessment applicable to the Hopes Advance iron mining project**

Dear Madam:

In its capacity as the preferential and official forum for the governments of Canada and Québec pursuant to Section 23 of the *James Bay and Northern Québec Agreement* (JBNQA), the Kativik Environmental Advisory Committee (KEAC) wishes to share with you its concerns regarding the Hopes Advance iron mining project situated near the Inuit community of Aupaluk. At the same time, the KEAC would like to submit recommendations to mitigate the difficulties faced by the residents of this community in relation to the project.

To begin, it should be recalled that the Hopes Advance iron mining project proposed by Oceanic Iron Ore Corp. is subject to three environmental assessment procedures, i.e. the provincial environmental and social impact assessment and review procedure under the JBNQA, the federal procedure under the *Canadian Environmental Assessment Act* (2012), and the review procedure under the *Nunavik Inuit Land Claims Agreement*. In addition to the fact that the application of these three environmental assessment procedures to a single project has generated a high degree of confusion among the residents of Aupaluk, the application of the federal procedure under the *Canadian Environmental Assessment Act* has regrettably been privileged over the federal JBNQA procedure. The KEAC is in particular of the opinion that the federal JBNQA procedure, which provides for direct Inuit participation, ensures more thorough consideration of the social impacts of projects subject to assessment.

In order to correct this situation that is unfair towards Inuit, the KEAC has examined the possibility of triggering the substitution and equivalence mechanism identified under the *Canadian Environmental Assessment Act*. Such an action, which must be requested by a provincial government, would permit the

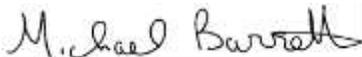
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application of the provincial procedure in lieu of the procedure under the *Canadian Environmental Assessment Act*, serving to reduce the number of procedures applicable to the Hopes Advance iron mining project and fostering the participation of Inuit in the environmental and social impact assessment. In this context, the KEAC wishes to be informed of the thinking of the Provincial Administrator regarding the possibility of triggering the substitution and equivalence mechanism identified under the *Canadian Environmental Assessment Act*.

The KEAC would also like to make the Provincial Administrator aware of a further concern, specifically the prolonged uncertainty surrounding the implementation of the Hopes Advance iron mining project. The KEAC has been informed that the project is having significant psychosocial impacts on the residents of Aupaluk, prior even to its description in an impact study. For close to four years, the lack of concrete details on the project originating from either the project proponent or the government, the never-ending wait for the project's implementation and ongoing mineral exploration near the community have given rise to all kinds of speculation, producing uncertainty in the community that is unacceptable. Given that the directive for the provincial impact study by Oceanic Iron Ore Corp. has not been valid since September 2015, the KEAC would like to be informed of the next steps envisaged by the project proponent for its project and the expected positions of the Provincial Administrator regarding a possible renewal of its directive and a continuation of the environmental and social assessment.

In light of the circumstances, the KEAC recommends that the Provincial Administrator ensure that the community of Aupaluk is clearly informed of the project proponent's intentions regarding the Hopes Advance iron mining project. As well, the KEAC would like to obtain information regarding the possible future of the project and, should Oceanic Iron Ore Corp. indicate its intention to continue with the project, the position of the Provincial Administrator regarding the production of a new directive and the continuation of its environmental assessment, taking into consideration the KEAC questions above regarding the triggering of the substitution and equivalence mechanism identified under the *Canadian Environmental Assessment Act*.

Sincerely,



Michael Barrett  
Chairperson

c.c. Ron Hallman, Federal Administrator, James Bay and Northern Quebec Agreement  
Peter Jacobs, Chairperson, Kativik Environmental Quality Commission