

first item of Schedule I, it states that "Any significant addition, alteration or modification of existing mining operations" must be subject to the environmental impact assessment process.

Considering the scope of the new infrastructures planned for Phase 2b and the potential impacts of the Delta project, the members of the KEAC have difficulty understanding why this phase will be analyzed through the process of amending an existing certificate of authorization and will therefore not be considered as a new project requiring an impact study. In our view, the creation of a new relocated sector with a significant amount of new infrastructure represents a significant set of modifications to the existing mining operation.

In this context, the KEAC wishes to obtain confirmation that Phase 2b planned by CRI will indeed be considered as a modification of the initial certificate of authorization issued in 2008, and, if so, to know what criteria were used to conclude that this phase does not represent a significant modification to the existing mining operation.

Finally, the KEAC notes that mining projects authorized under the assessment and review process provided for in Section 23 of the JBNQA often see a significant number of modifications made after the fact to their initial certificate of authorization. The impacts of these modifications, sometimes significant, are thus analyzed on a case-by-case basis rather than being considered in the context of the project as a whole and its cumulative impacts. Consequently, the Committee would like to know the criteria used by your department to determine whether or not a modification to an existing mining project should be subject to an impact study as provided for in Section 23 of the JBNQA.

Sincerely,



Alexandre-Guy Côté
Chairperson, KEAC

cc. Mr. Pierre Philie, Chairperson of the Kativik Environmental Quality Commission