



Kuujjuaq, March 3, 2023

Mrs. Marie-Josée Lizotte  
Provincial Administrator of the James Bay and Northern Quebec Agreement  
Deputy Minister of the Ministère de l'Environnement, de la Lutte contre les changements climatiques, de la Faune et des Parcs  
Marie-Guyart Building  
675 René-Lévesque Boulevard East, Box 02  
Quebec City, Quebec G1R 5V7

**Subject: Amendment to the Certificate of Authorization for Canadian Royalties Inc.'s Nunavik Nickel Mining Project**

Ms. Lizotte,

The Kativik Environmental Advisory Committee (KEAC) was created in 1975 under Section 23 of the James Bay and Northern Quebec Agreement (JBNQA). It is consultative body to responsible governments on matters relating to environmental and social protection in Nunavik. It is the privileged and official forum of the governments of Canada and Québec as well as the Kativik Regional Government (KRG) and the Northern villages. The Committee is responsible for monitoring the application and administration of the environmental and social protection regime applicable in the Nunavik region through the exchange of views, opinions and information.

At the 174<sup>th</sup> meeting of the KEAC which was held on December 14 and 15, 2022 in Kuujjuaq, representatives of Canadian Royalties Inc. (CRI) presented to the committee members their environmental program as well as the expansion projects for their Nunavik Nickel mine property. At this meeting, CRI representatives presented their Phase 2b project, called the Delta project, for which the proponent intends to file an application to amend the certificate of authorization issued in 2008 for the initial development of the mine.

The Delta project will involve the development of a new area, including the opening of a new deposit, the construction of a multi-kilometre road, a base camp and water treatment plant, the development of a potable water source through a water pipeline and several other infrastructures. This new development will be located in a caribou calving ground. During the presentation to the KEAC, the CRI representatives mentioned that the various projects in Phase 2, including the Delta project, were considered amendments to the initial application for a certificate of authorization. The members of the KEAC are concerned about this situation and wish to share their concerns with you.

According to Section 23.3.12 of the JBNQA, all developments listed in Schedule I must automatically be subject to the assessment and review processes set forth in Section 23. In the

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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