

## List of Key Mitigation, Monitoring and Follow-up Measures Considered by the Agency

Valued Component	Mitigation, Monitoring and Follow-up Measures
Effects identified under subsection 5(1) of CEAA 2012	
Fish and fish habitat	<p><b>Mitigation measures</b></p> <ul style="list-style-type: none"> <li>• Shall manage effluent produced by the Project by ensuring that effluent is collected and treated if required before being discharged into the environment;</li> <li>• Shall comply with the <i>Metal Mining Effluent Regulations</i>, the <i>Fisheries Act</i>, and any requirements of the Government of Quebec regarding the management of effluent discharges from the Project, including the installation of a wastewater treatment unit at the mine water pond discharge point, to be operated, to ensure compliance with those standards and requirements;</li> <li>• Shall avoid the burial, installation and disassembly of the mine effluent discharge pipe in Lac des Montagnes during the critical timing windows for northern pike, walleye, white sucker and lake whitefish, and shall take measures to control the release of suspended solids in the water during those construction activities;</li> <li>• Shall, in consultation with Fisheries and Oceans Canada, develop and implement a plan to offset the loss of fish and fish habitat associated with the carrying out of the Project;</li> <li>• For any fish habitat offsets area proposed in any offsetting plan, prior to submitting the offsetting plan to Fisheries and Oceans Canada, and in consultation with the Cree Nation of Nemaska, and the Cree Nation Government, shall determine whether there are adverse effects on: <ul style="list-style-type: none"> <li>○ migratory birds and their habitat;</li> <li>○ species at risk and their habitat;</li> <li>○ current use of lands and resources for traditional purposes by the Cree Nation of Nemaska; and</li> <li>○ sites of physical and cultural heritage importance to the Cree Nation of Nemaska.</li> </ul> </li> <li>• Shall, if there are adverse effects on any of the previous elements, avoid or lessen those adverse effects.</li> </ul> <p><b>Monitoring and follow-up</b></p> <ul style="list-style-type: none"> <li>• Monitor whether implementation of the measures set out in the fish habitat offsetting plan is proving effective in achieving the objectives set out in that plan;</li> <li>• Determine the effectiveness of effluent mitigation measures in managing effluent quality and effects on the receiving environment, including benthic organisms and fish in the lac des Montagnes;</li> <li>• Monitor effluent concentrations of lithium and beryllium, in accordance with the same requirements for the other</li> </ul>

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	<p>substances in Schedule 5 of <i>the Metal Mining Effluent Regulations</i>, to verify the accuracy of water quality predictions in the environmental assessment;</p> <ul style="list-style-type: none"> <li>• Monitor surface water quality annually in Lac du Spodumène and lakes 1, 2, 18 and 28, to verify the accuracy of the water quality predictions in the environmental assessment. Monitoring shall begin with construction and end five years after decommissioning. The monitoring shall include the following elements: <ul style="list-style-type: none"> <li>○ analysis of the substances specified in the <i>Metal Mining Effluent Regulations</i>, Schedule 4 (column 1) and Schedule 5, subsection 4(1), with the addition of lithium and beryllium; and</li> <li>○ comparison of the concentration measures with the chronic aquatic life criteria, as defined in <i>Quebec's Critères de qualité de l'eau de surface</i> and the Canadian Council of Ministers of the Environment's <i>Canadian Water Quality Guidelines for the Protection of Aquatic Life</i>;</li> </ul> </li> <li>• Monitor water flows and levels in relation of the brook trout spawning sites in Stream D, in the downstream section of Stream C and in a control watercourse not affected by pumping of the pit, and monitoring water levels in Lac du Spodumène and accessibility to the potential brook trout spawning site in Stream G. Details of the monitoring to be conducted shall be determined in consultation with Fisheries and Oceans Canada;</li> <li>• Shall, before construction begins, conduct an analysis to confirm the environmental assessment prediction that metals and metalloids contained in the waste rock and the tailings from the Project are not leachable, and submit the results of the analysis to the Agency and the Cree Nation Government. If metals and metalloids contained in the waste rock and tailings prove to be leachable, shall add these new leachable substances to the follow-up program for the quality of effluent and its receiving environment and implement mitigation measures to protect groundwater.</li> </ul>
Migratory birds	<p><b>Mitigation measures</b></p> <ul style="list-style-type: none"> <li>• Shall carry out all phases of the Project in a manner that protects and avoids harming, killing or disturbing migratory birds or destroying, disturbing or taking their nests or eggs. In this regard, shall take into account Environment Canada's <i>Avoidance Guidelines</i>. The Proponent's actions in applying the Avoidance Guidelines shall be in compliance with the <i>Migratory Birds Convention Act, 1994</i> and with the <i>Species at Risk Act</i>.</li> </ul> <p><b>Monitoring and follow-up</b></p> <ul style="list-style-type: none"> <li>• Shall develop and implement a follow-up program to determine the effectiveness of the mitigation measures used to comply during all phases of the Project.</li> </ul>
Current use of lands and resources for traditional purposes by Aboriginal persons	<p><b>Mitigation measures</b></p> <ul style="list-style-type: none"> <li>• Shall, in consultation with the Cree Nation of Nemaska, develop and implement a follow-up program to monitor the presence of wildlife species of interest in the Project area and to develop and implement of any corrective measures to mitigate adverse effects of the Project of those wildlife species of interest. The follow-up program shall begin with the start of construction and end following decommissioning;</li> </ul>

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	<ul style="list-style-type: none"> <li>• In consultation with the Cree tallyman, the Cree Nation of Nemaska and the Cree Nation Government, shall determine the optimal location of the mine effluent pipe in the Lac des Montagnes, taking into consideration the fishing areas of the Cree Nation of Nemaska;</li> <li>• Shall develop and implement a communication plan in consultation with the Cree Nation of Nemaska in order to keep the Cree Nation of Nemaska informed of the Project schedule and any updates or revisions to that schedule as stated and of the results of the wildlife species of interest follow-up programs. Implementation of the communication plan shall begin at the same time as the construction phase and end following decommissioning;</li> <li>• In consultation with the Cree tallyman, the Cree Nation of Nemaska and the Cree Nation Government, shall develop a program for the management of beaver, black bear and the recuperation of harvested wood for the use of the Cree Nation of Nemaska in the Project area prior to construction;</li> <li>• In consultation with the Cree Nation of Nemaska, shall determine a safety zone with respect to the Project for the purpose of ensuring public safety;</li> <li>• Shall prohibit its employees and contractors from hunting, fishing and trapping within the limits of the mining lease and the surface use leases unless an employee or a contractor is provided access for traditional purposes or for exercising Aboriginal or treaty rights, in which case such access will be in accordance with all rules established by the Proponent with respect to the safety zone;</li> <li>• In consultation with the Cree Tallyman and the Cree Nation of Nemaska, shall undertake progressive reclamation of the habitats impacted by the Project.</li> </ul>
Health and socio-economic conditions of Aboriginal persons	<p><b>Mitigation measures</b></p> <ul style="list-style-type: none"> <li>• shall, during all phases of the Project, implement mitigation measures to manage air emissions of the Project which shall include: <ul style="list-style-type: none"> <li>○ use of dust control products;</li> <li>○ a 30 kilometers per hour speed limit for vehicles on the Project site; and</li> <li>○ progressive reclamation of the waste rock and tailings pile.</li> </ul> </li> </ul> <p><b>Monitoring and follow-up</b></p> <ul style="list-style-type: none"> <li>• In order to verify the accuracy of the environmental assessment of the Project and to determine the effectiveness of the mitigation measures, shall develop and implement a follow-up program on health and socio-economic conditions that shall include: <ul style="list-style-type: none"> <li>○ monitoring the air quality at the Bible Camp and at hunting camp most likely to be affected by the Project using the Canadian Council of Ministers of the <i>Environment’s Canadian Ambient Air Quality Standards</i> and the Quebec <i>Clean Air Regulation</i> as benchmarks. Air quality monitoring shall be implemented from the beginning of construction until the completion of the decommissioning phase;</li> </ul> </li> </ul>

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	<ul style="list-style-type: none"> <li>○ notifying the Cree Nation of Nemaska if monitoring shows exceedances of the Canadian Council of Ministers of the <i>Environment's Canadian Ambient Air Quality Standards</i> or the <i>Quebec Clean Air Regulation</i>, and, if necessary, implementing additional mitigation measures; and</li> <li>○ monitoring, every three years, heavy metal concentrations in the flesh and livers of walleye, northern pike and lake whitefish in Lac des Montagnes and Lac du Spodumène. The monitoring program shall be implemented when construction begins and end five years after the decommissioning phase is completed.</li> <li>● Shall, in consultation with the Cree Nation of Nemaska, develop and implement a plan for communicating the results of the monitoring programs to the Cree Nation of Nemaska, as well as any corrective measures to be taken. The Proponent shall implement this communication plan from the beginning of construction until the completion of decommissioning.</li> </ul>
Physical and cultural heritage and sites and structures of historical, archaeological, paleontological or architectural significance to Aboriginal peoples	<p><b>Mitigation measures</b></p> <ul style="list-style-type: none"> <li>● In the event that archaeological remains or artefacts are discovered by the Proponent in the Project area, the Proponent shall: <ul style="list-style-type: none"> <li>○ halt work at the location of the discovery;</li> <li>○ have a qualified individual conduct an assessment at the location of the discovery;</li> <li>○ inform, in writing, the Cree tallyman directly affected by the Project, the Cree Nation of Nemaska and the Cree Nation Government, forthwith; and</li> <li>○ comply with any legislative or legal requirements respecting the discovery of archeological remains or artefacts.</li> </ul> </li> <li>● Shall implement the following mitigations measures to reduce visual nuisance: <ul style="list-style-type: none"> <li>○ burial of the effluent discharge pipe at least 100 meters away from the shoreline and in the littoral zone in accordance with the Fisheries and Oceans Canada requirements, in order to prevent serious harm to fish;</li> <li>○ progressive re-vegetation of the waste rock and tailings pile;</li> <li>○ reclamation of the mine site after decommissioning is completed.</li> </ul> </li> <li>● Shall, subject to the safety requirements of the Project and the safety zone established, ensure access to Lac des Montagnes, in the north-east sector, so that the users of the Bible Camp can carry on all their activities on the lake and its shores, such as swimming and canoeing.</li> </ul> <p><b>Monitoring and follow-up</b></p> <ul style="list-style-type: none"> <li>● Shall, during all phases of the Project, develop and implement a noise-level follow-up program at the Bible Camp and the hunting camp most likely to be affected to verify that the noise levels originating from the Project respect the noise levels set out in the <i>Note d'instructions du Québec 98-01 sur le bruit</i>;</li> <li>● Shall develop and implement a plan for communicating the results of the follow-up program to the Cree nation of Nemaska and shall consult the Cree Nation of Nemaska concerning implementation of any corrective measures.</li> </ul>
Accidents or malfunctions	<p><b>Mitigation measures</b></p>

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	<ul style="list-style-type: none"> <li>• Shall take all reasonable measures to prevent accidents and malfunctions that may result in adverse environmental effects and shall implement emergency response procedures and contingencies developed in relation to the Project;</li> <li>• Shall, prior to construction, consult with the Cree Nation of Nemaska to identify potential accidents and malfunctions that may result in an adverse environmental effect, and on the measures to be applied to prevent such accidents and malfunctions;</li> <li>• shall develop and implement a communication plan in consultation with the Cree Nation of Nemaska that shall include: <ul style="list-style-type: none"> <li>○ the type of accident or malfunction that requires a notification by the Proponent to the Cree Nation of Nemaska;</li> <li>○ the manner by which the Cree Nation of Nemaska shall be notified by the Proponent of an accident or malfunction, and of any opportunities for the Cree Nation of Nemaska to assist in the response to the accident or malfunction; and</li> <li>○ the contact information of the representatives of the Proponent that the Cree Nation may contact and of the representative of the Cree Nation of Nemaska to which the Proponent provides notification.</li> </ul> </li> </ul> <p><b>Monitoring and follow-up</b></p> <ul style="list-style-type: none"> <li>• In the event of an accident or malfunction with the potential to cause adverse environmental effects, shall: <ul style="list-style-type: none"> <li>○ notify relevant federal and provincial authorities, including notifying the Agency in writing of the accident or malfunction as soon as possible in the circumstances;</li> <li>○ implement immediate measures to minimize any adverse environmental effects associated with the accident or malfunction;</li> <li>○ submit a written report to the Agency, no later than 30 days after the day on which the accident or malfunction took place. The written report shall include: <ul style="list-style-type: none"> <li>▪ a description of the accident or malfunction and its adverse environmental effects;</li> <li>▪ the measures that were taken by the Proponent to mitigate the adverse environmental effects of the accident or malfunction;</li> <li>▪ a description of any residual environmental effects, and any additional measures required to address residual environmental effects; and</li> <li>▪ if an emergency response plan was implemented, details concerning its implementation.</li> </ul> </li> <li>○ no later than 90 days after the day on which the accident or malfunction took place, submit a written report to the Agency on the changes made to avoid a subsequent occurrence of the accident or malfunction, and on the implementation of any additional measures to mitigate residual environmental effects;</li> </ul> </li> </ul>