

Kelly LeBlanc

Environmental and Social Assessment Coordinator

Cree Nation Government

February 10th, 2021

Re: Request for Expert Advice: the Cree Board of Health and Social Services of James Bay

Dear Ms. LeBlanc,

On February 10th the Cree Board of Health and Social Services of James Bay (CHB) received a request for advice from you, with a series of questions. The questions are found below in normal font and the CHB answers are presented in italics:

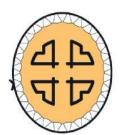
Existing environment and baseline conditions

1-Is the information presented by the proponent in relation to the consumption of traditional food and the health of the Cree Nations located in the vicinity of the project adequately described and documented?

Yes, this is a low-risk mining site, and a risk assessment was conducted, which goes above and beyond the usual recommendations.

Potential impacts

2-Have the potential impacts on the health of the Cree Nations in the vicinity of the project (resulting from changes to the quality of traditional food) been adequately identified and documented by the proponent?



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Yes, they were extensively documented in a risk assessment that took into account traditional food. Conservatism was used across the board in all parameters, so in all likelihood the risk was overestimated.

For the element of tantalum, which would be discharged into surface water, there is no reliable toxicological information, however the few indications that exist suggest low toxicity. In this case, it would be appropriate for the benthos to be monitored at the point of discharge with a comparison to an area further away. Water concentrations of tantalum could also be measured, and a toxicity reference value could be derived in the future if considered necessary.

In previous discussions the elements of arsenic, cadmium, mercury and lead were mentioned since they have the potential to bioaccumulate. The concentrations measured of these elements in rock does not exceed the Quebec A Criteria for soils, which is considered to be appropriate for residential use. This criteria is considered to be protective of sensitive receptors such as toddlers and children, therefore further scrutiny of these substances is not warranted.

Mitigation Measures

3-As part of the mitigation measures proposed by the proponent and Health Canada, please identify those that you consider to be key measures. Please propose corrective measures (if necessary) or recommend any other measures that you consider essential to avoid or mitigate impacts and that would not have been proposed by the proponent or Health Canada.

The dust control plan is a key measure to avoid off-site dust impacts, these measures should be enforced even though elevated levels of heavy metals in dust are not anticipated. Furthermore, the typical environmental controls used for all mining sites should be sufficient to ensure that there are no undue health impacts to humans or ecosystems.

Monitoring and Follow-up Programs

5-Does the monitoring program verify and control the implementation of mitigation measures and ensure that they are appropriate to diminish, avoid or mitigate potential impacts on each of the elements?

The risk assessment does not anticipate any risks due to wind erosion and deposition of dust. As an additional level of safety, environmental monitoring of dust (ie. in the form of a dust fall jar) could measure the effectiveness of the dust control measures implemented on-site.



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Since the risk assessment showed that all risks were found to be acceptable, additional monitoring of ecosystems is not considered to be necessary. Apart from cost and time to conduct these studies, there are additional drawbacks to such studies: there can be significant disruption to wildlife, a small area of impact might not be able to provide sufficient sampling for statistical significance, and it might further increase the concern of the Cree population and turn them away from traditional food. Similar academic studies have been conducted in the past in Eeyou Istchee (and included biomonitoring), and they did not change the public perceptions concerning mining and health risks for the community in question.

I trust these answers are to your satisfaction and do not hesitate to contact me if you have any further comments or questions, sincerely,

<Original signed by>

Paul Meillon MSc.

Cc: Dr. Marie-Jo Ouimet - Public Health Director