

GALAXY PROJECT – 2024 ANNUAL REPORT IN RESPONSE TO CONDITION 2.10 OF THE DECISION STATEMENT DATED JULY 26, 2024

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SUMMARY

In March 2024, Galaxy Lithium (Canada) Inc. (GLCI) began site preparation and pre-construction work on its Galaxy project. The project is located in the Nord-du-Québec administrative region, approximately 10 km south of the Eastmain River and approximately 130 km east of James Bay, at the same latitude as the Cree village of Eastmain. The site is located on Category III lands under the James Bay and Northern Quebec Agreement (JBNQA), accessible via the Billy Diamond Road and near the 381 km truck stop.

The following report presents the activities carried out by GLCI between January 1 and December 31, 2024, to meet the conditions of the Decision Statement issued by the Minister of Environment and Climate Change Canada on January 13, 2023, and amended on July 26, 2024. This report is prepared in accordance with the requirements stipulated in Condition 2.10 of the Decision Statement.

The main activities carried out during the period covered by this report are as follows:

- Consultation with First Nations and relevant government authorities during the development of several documents to be prepared prior to project construction.
- Finalization of environmental follow-up programs to verify the accuracy of the environmental assessment and assess the effectiveness of mitigation measures with respect to the project's adverse environmental effects.
- Installation of observation wells (Phase 2) to monitor groundwater quality and levels around the projected infrastructure.
- Environmental monitoring (groundwater levels and quality, surface water quality, hydrology, birdlife, bats, caribou, wetlands, invasive exotic plant species, air quality, noise measurements, quality of traditional food plants, beaver and fish).
- Site environmental management.

RÉSUMÉ

En mars 2024, Galaxy Lithium (Canada) Inc. (GLCI) a démarré des travaux de préparation de site et de pré-construction de son projet Galaxy. Le projet se trouve dans la région administrative du Nord-du-Québec, à environ 10 km au sud de la rivière Eastmain et à quelque 130 km à l'est de la Baie-James, à la même latitude que le village cri d'Eastmain. Le site se trouve sur des terres de catégorie III selon la Convention de la Baie-James et du Nord québécois (CBJNQ), accessible par la route Billy-Diamond et à proximité du relais routier du km 381.

Le rapport qui suit présente les activités réalisées entre le 1^{er} janvier et le 31 décembre 2024 par GLCI pour satisfaire aux conditions de la Déclaration de décision émise par le ministre de l'Environnement et Changement climatique Canada le 13 janvier 2023 et modifiée le 26 juillet 2024. Ce rapport est préparé conformément aux exigences stipulées dans la condition 2.10 de la Déclaration de décision.

Les principales activités qui ont été menées pendant la période couverte par le présent rapport sont les suivantes :

- Consultation des Premières Nations et des autorités gouvernementales concernées lors de l'élaboration de plusieurs documents à préparer avant la construction du projet.
- Finalisation de programmes de suivis environnementaux visant à vérifier la justesse de l'évaluation environnementale et à juger de l'efficacité des mesures d'atténuation relativement aux effets environnementaux négatifs du projet.
- Installation de puits d'observation (phase 2) pour le suivi de la qualité et des niveaux d'eau souterraine autour des infrastructures projetées.
- Suivis environnementaux (niveaux et qualité de l'eau souterraine, qualité de l'eau de surface, hydrologie, faune aviaire, chiroptères, caribous, milieux humides, espèces végétales exotiques envahissantes, qualité de l'air, mesures de bruit, qualité de la nourriture traditionnelle – plantes, castor et poissons).
- Gestion environnementale au site.



1. INTRODUCTION

1.1. PURPOSE OF THE REPORT

This annual report prepared by Galaxy Lithium Canada Inc. (GLCI) outlines the progress of the Galaxy project with respect to the conditions set out in the Decision Statement issued on January 13, 2023, and amended on July 26, 2024, by the Minister of the Environment and Climate Change Canada pursuant to section 54 of the *Canadian Environmental Assessment Act*, 2012. This report, required by condition 2.10 of this Statement, covers the period between January 1 and December 31, 2024.

1.2. PROJECT DESCRIPTION

The project is located within the territory of the Eeyou Istchee James Bay Regional Government (EIJBRG), in the Nord-du-Québec administrative region. The project is located approximately 130 km east of James Bay and the village of Eastmain. The general location of the Galaxy project is shown on Map 1.

The central coordinates of the site are as follows

UTM, 18 N (NAD83): N: 5 789 180 E: 358 891

Degrees, minutes, seconds (WGS84): 52° 14'5.74 "N 77° 3'59.09 "O

The Galaxy project consists of a new open pit spodumene mining complex. The project also includes accumulation areas for ore, waste rock, tailings and overburden, as well as a spodumene concentrator and mine water management facilities, including a water treatment plant. The project site is accessible by the Billy-Diamond Highway from Matagami. The mine has an ore production capacity of 5,480 tons per day, with an 18.5-year mine life, for an average annual production of 331 kilotons of spodumene concentrate.

CARTE 1: LOCATION OF THE GALAXY PROJECT



2. ACTIVITIES CONDUCTED BY GLCI

Since issuance of the Decision Statement on January 13, 2023, and its amendment dated July 26, 2024, by the Minister of the Environment and Climate Change Canada, GLCI has pursued its authorization procedures at the federal and provincial levels. During the period covered by this report, GLCI carried out the following pre-construction site preparation activities:

- Tree cutting (Map 2).
- Set up of temporary camp at km 381 truck stop.
- Installation of the permanent camp and kitchen in the industrial sector of the site.
- Construction of the substation and installation of the electrical chamber.
- Culvert installation on CE3 watercourse.
- Construction of an access road to CE3 watercourse. This access road is the underlayer of the future haul road.

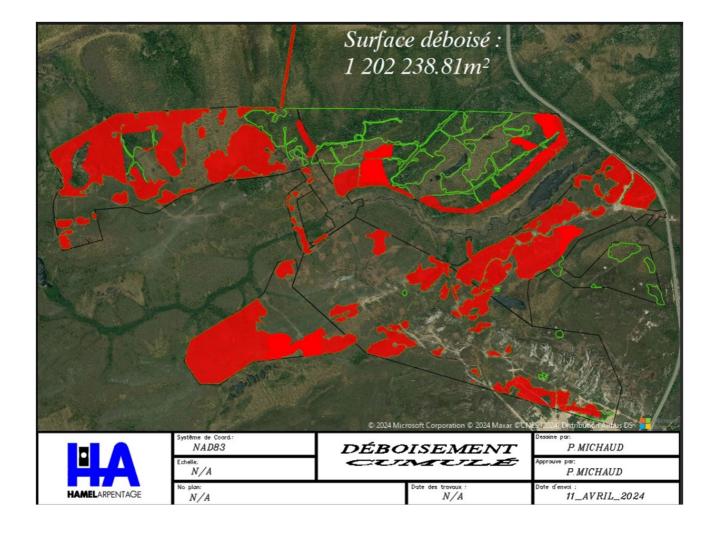
The following sections detail the activities performed by GLCI in 2024 to meet each of the conditions set out in the Decision Statement dated January 13, 2023, and amended on July 26, 2024, which relate to the pre-construction phase.

The following color code is used to clearly indicate the state of compliance with the condition:

Condition not applicable for the period covered by this report
Condition completed
Condition completed for the period covered by this report but continuing in subsequent years
Condition in progress
Condition not completed, no delays anticipated
Condition not completed and overdue



CARTE 2: CLEARED AREA





2.2. GENERAL CONDITIONS

Condition #	Details and Follow-Up of Conditions	Status of Implementation
	General Conditions	
2.1	The Proponent shall ensure that its actions in meeting the conditions set out in this Decision Statement during all phases of the Designated Project are considered in a careful and precautionary manner, promote sustainable development, are informed by the best information and knowledge including community and Indigenous knowledge, available at the time the Proponent takes action, are based on methods and models that are recognized by standard-setting bodies, are undertaken by qualified individuals, and have applied the best available economically and technically feasible technologies.	Ongoing
	Follow-up on condition GLCI aims to develop its lithium mine project as a sustainable mining operation. For the period covered by this report, policies, procedures, guidelines, training, community knowledge and indigenous knowledge were considered and/or applied.	
	The Proponent shall ensure that its actions in meeting the conditions set out in this Decision Statement are taken in a way that is consistent with any applicable recovery strategy and action plans for listed species at risk.	
2.2	Follow-up on condition The follow-up programs that have been developed for listed species at risk take existing recovery strategies into account and ensure that the measures to be taken to meet the conditions of the Decision Statement are consistent and coherent with these programs.	Ongoing
	Consultation	
2.3 2.3.1 2.3.2 and 2.3.4	The Proponent shall, where consultation is a requirement of a condition set out in this Decision Statement: provide a written notice of the opportunity for the parties being consulted to present their views and information on the subject matter of the consultation; provide all information available and relevant to the scope and the subject matter of the consultation and a reasonable period of time agreed upon with the parties being consulted, not to be less than 15 days, to prepare their views and information; undertake an impartial consideration of all views and information presented by the parties being consulted on the subject matter of the consultation; and advise as soon as feasible the parties being consulted on how the views and information received have, or have not, been integrated into the subject matter of the consultation by the Proponent, and provide a justification.	Completed



Condition #	Details and Follow-Up of Conditions	Status of Implementation
	Follow-up on condition This condition was completed in 2023; information on compliance with this condition is presented in the 2023 Annual Report. However, a number of communications were made to stakeholders in 2024, particularly in relation to certain conditions of the Decision Statement. The main communications can be found in a register presented in Appendix A.	
2.4 2.4.1 2.4.2 2.4.3 and 2.4.4	 The Proponent shall, where consultation with First Nations is a requirement of a condition set out in this Decision Statement, communicate with First Nations with respect to the manner to satisfy the consultation requirements referred to in condition 2.3, including methods of notification; the type of information and the period of time to be provided when seeking input; the process to be used by the Proponent to undertake impartial consideration of all views and information presented on the subject of the consultation; and the period of time and the means to advise First Nations of how their views and information were considered by the Proponent. 	Completed
	This condition was completed in 2023; information on compliance with this condition is presented in the 2023 Annual Report. Follow-Up and Adaptive Management	
2.5 2.5.1 2.5.2 2.5.3 2.5.4 2.5.5 and 2.5.6	 The Proponent shall, where a follow-up program is a requirement of a condition set out in this Decision Statement, determine, as part of the development of each follow-up program and in consultation with the parties being consulted during the development, the following information, unless otherwise specified in the condition: the methodology, location, frequency, timing and duration of monitoring associated with the follow-up program; the scope, content and frequency of reporting of the results of the follow-up program to the parties consulted for the development of the follow-up program; the minimum frequency at which the follow-up program must be reviewed and, if necessary, updated; the levels of environmental change relative to baseline that would require the Proponent to implement modified or additional mitigation measure(s), including instances where the Proponent may require Designated Project activities causing the environmental change to be stopped; the technically and economically feasible mitigation measures to be implemented by the Proponent if monitoring conducted as part of the follow-up program shows that the levels of environmental change 	Completed
	referred to in condition 2.5.4 have been reached or exceeded in order to return environmental changes to levels below those referred to in condition 2.5.4; and	



Condition #	Details and Follow-Up of Conditions	Status of Implementation
	the specific and measureable end points that must be achieved before the follow-up program can end. Those end points should indicate that the accuracy of the environmental assessment has been verified and/or that the mitigation measures are effective.	
	Follow-up on condition	
	This condition was completed in 2023; information on compliance with this condition is presented in the 2023 Annual Report.	
	The Proponent shall update the information determined for each follow-up program pursuant to condition 2.5 during the implementation of each follow-up program, at the minimum frequency determined pursuant to condition 2.5.3 and in consultation with the parties being consulted during the development of each follow-up program.	
2.6	Follow-up on condition	Ongoing
	The follow-up programs were implemented in 2024. Some minor modifications will have to be made to some programs (e.g. relocation of some wetland monitoring stations). Details are provided in each of the conditions concerned. The parties consulted during the development of each follow-up program will be informed of any changes in due course.	
	The Proponent shall provide the follow-up programs referred to in conditions 3.17, 3.18, 3.19, 3.20, 3.21, 4.8, 5.6, 5.7, 6.5, 7.13, 7.14, 7.15, 7.16, 8.17 and 8.18, including the information determined for each follow-up program pursuant to condition 2.5, to the Agency, the Cree Nation Government, and to the parties being consulted during the development of each follow-up program prior to the implementation of each follow-up program. The Proponent shall also provide any update made pursuant to condition 2.6 to the Agency, the Cree Nation Government and to the parties being consulted during the development of each follow-up program within 30 days of the follow-up program being updated.	
2.7	Follow-up on condition	Ongoing
	In 2023, when developing the follow-up programs referred to in conditions 3.17, 3.18, 3.19, 3.20, 3.21, 4.8, 5.6, 5.7, 6.5, 7.13, 7.14, 7.15, 7.16, 8.17 and 8.18, GLCI provided details to the consulted parties. GLCI forwarded these follow-up programs to the Agency on March 18, 2024, once all the comments from the consulted parties had been incorporated, and prior to their implementation.	
	GLCI will also provide updates to any follow-up program within 30 days of the update, to the Agency, the Cree Nation Government and the parties consulted, in accordance with condition 2.6.	



Condition #	Details and Follow-Up of Conditions	Status of Implementation
	The Proponent shall, where a follow-up program is a requirement of a condition set out in this Decision Statement:	
2.8 2.8.1 2.8.2 2.8.3 2.8.4 and 2.8.5	 implement the follow-up program according to the information determined pursuant to condition 2.58 conduct monitoring and analysis to verify the accuracy of the environmental assessment as it pertains to the particular condition and/or to determine the effectiveness of any mitigation measure; determine whether modified or additional mitigation measure(s) are required based on the monitoring and analysis undertaken pursuant to condition 2.8.2; if modified or additional mitigation measure(s) are required pursuant to condition 2.8.3, develop and implement these mitigation measure(s) as soon as feasible and monitor them pursuant to condition 2.8.2. The Proponent shall notify the Agency and the Cree Nation Government prior to implementing any modified or additional mitigation measure, or within 24 hours of any modified or additional mitigation measure being implemented when urgent or immediate intervention is required. If the Proponent implements any additional or modified mitigation measure not previously submitted to the Agency and the Cree Nation Government pursuant to condition 2.5, the Proponent shall submit a detailed description of the measure(s) to the Agency within 7 days of their implementation; and report all results of the follow-up program to the Agency and the Cree Nation Government no later than March 31 following each reporting year during which the follow-up program is implemented and, subject to information determined pursuant to 2.5.2, to the parties being consulted during the development of the follow-up program. 	Ongoing
	Follow-up on condition	
	Considering that work on site started in March 2024, the follow-up programs that were developed in accordance with condition 2.5 and that needed to be implemented at the start of the construction phase were implemented.	
	No modified or additional mitigation measures were required as a result of the monitoring and analysis carried out in accordance with condition 2.8.2.	
	The results of the follow-up programs are presented in this report and submitted to the Agency and the Cree Nation Government no later than March 31, 2025.	



Condition #	Details and Follow-Up of Conditions	Status of Implementation
	Where consultation with First Nations is a requirement of a follow-up program, the Proponent shall discuss the follow-up program with each group and shall determine, in consultation with each group, opportunities for their participation in the implementation of the follow-up program, including the conduct of monitoring, the analysis and reporting of follow-up results and whether modified or additional mitigation measure(s) are required, as set out in condition 2.8.	
	Follow-up on condition	
2.9	The follow-up programs were the subject of consultation with the First Nations in 2023. In 2024, when planning field work for the various follow-up programs, it was planned to involve and train Mr. Cameron Cheezo, a member of the Eastmain Cree Nation. Mr. Cheezo participated in air quality monitoring and site work supervision for a certain period of time. However, for personal reasons, Mr. Cheezo withdrew during the year.	Ongoing
	As presented in Appendix A, on a few occasions, the tallyman of RE02, Mr. Brian Weapenicappo, and members of his family were offered the opportunity to participate in some field work, including:	
	- Characterization of wetland compensation projects.	
	- Sampling for surface and ground water quality.	
	- Inventory and beaver trapping to monitor country food quality.	
	- Noise monitoring at the km 381 truck stop.	
	Finally, GLCI is committed to maintaining exchanges with First Nations throughout the life of the project, including opportunities to participate in the implementation of specific follow-up programs, including the conduct of monitoring, the analysis and communication of follow-up results, and the identification of modified or additional mitigation measures, if required.	



Condition #	Details and Follow-Up of Conditions	Status of Implementation
	Annual Reporting	
2.10 2.10.1 2.10.2 2.10.3 2.10.4 2.10.5 2.10.6 and 2.10.7	 The Proponent shall prepare an annual report for each reporting year that sets out: the activities undertaken by the Proponent to comply with each of the conditions set out in this Decision Statement; how the Proponent complied with condition 2.1; for conditions set out in this Decision Statement for which consultation is a requirement, how the Proponent considered any views and information that the Proponent received during or as a result of the consultation; the information referred to in conditions 2.5 for each follow-up program and any update to that information made pursuant to condition 2.6; the summary of available results of the follow-up program requirements identified in conditions 3.17, 3.18, 3.19, 3.20, 3.21, 4.8, 5.6, 5.7, 6.5, 7.13, 7.14, 7.15, 7.16, 8.17 and 8.18; for any plan that is a requirement of a condition set out in this Decision Statement, any update(s) to the plan that have been made during the reporting year; and any modified or additional mitigation measure implemented or proposed to be implemented by the Proponent, as determined pursuant to condition 2.8. 	Ongoing
	Follow-up on condition This annual monitoring report is prepared and filed in accordance with condition 2.10 and other related conditions.	
2.11	The Proponent shall submit the annual report referred to in condition 2.10 to the Agency and the Cree Nation Government, including a plain language executive summary in both official languages, no later than March 31 following the reporting year to which the annual report applies.	
	Follow-up on condition This annual report includes a plain-language summary in English and French. It is submitted to the Agency and the Cree Nation Government before March 31, 2025, and covers the period from January 1 to December 31, 2024.	Ongoing
2.12	The first reporting year for which the Proponent shall prepare an annual report pursuant to condition 2.10 shall start on the day the Minister of the Environment issues the Decision Statement pursuant to subsection 54 (1) of the Canadian Environmental Assessment Act, 2012.	Completed
	Follow-up on condition This condition was completed in 2023; information on compliance with this condition is presented in the 2023 Annual Report.	



Condition #	Details and Follow-Up of Conditions	Status of Implementation
	Information Sharing	
2.13	The Proponent shall publish on the Internet, or any medium which is publicly available, the annual reports and the executive summaries referred to in conditions 2.10 and 2.11, the action plan referred to in condition 5.1, the communication plan referred to in condition 8.1, the accident and malfunction response plan referred to in condition 12.3, the reports related to accidents and malfunctions referred to in conditions 12.5.3 and 12.5.4, the communication plan for accident and malfunction referred to in condition 12.6, the schedules referred to in conditions 13.1 and 13.2, and any update or revision to the above documents, upon submission of these documents to the parties consulted for the respective conditions. The Proponent shall keep these documents publicly available for 25 years following the end of operation, or until the end of decommissioning of the Designated Project, whichever comes first. The Proponent shall notify the Agency, the Cree Nation Government and First Nations of the availability of these documents within 48 hours of their publication.	Ongoing
	Follow-up on condition	
	Although a request for publication was sent internally in 2024, none of the documents listed in the condition could be posted on the project website before Q1-2025 or on any other medium widely accessible to the general public. However, all the documents listed have been available since January 2025. Galaxy has informed the Agency, the Cree Nation Government and the First Nations of the availability of these documents within 48 hours of their publication.	
	These documents will also be preserved and will continue to be made public for up to 25 years after the end of operations, or until the project has been decommissioned.	
	When the development of any plan is a requirement of a condition set out in this Decision Statement, the Proponent shall submit the plan to the Agency and the Cree Nation Government prior to construction, unless otherwise required through the condition.	
2.14	Follow-up on condition	Completed
	The plans required by the conditions of this Decision Statement have been submitted to the Cree Nation Government where specified in the condition. All plans were transmitted to the Agency and the Cree Nation Government on March 18, 2024, prior to the start of construction of the project.	
	Change of Proponent	
2.15	The Proponent shall notify the Agency, the Cree Nation Government and First Nations in writing no later than 30 days after the day on which there is any transfer of ownership, care, control or management of the Designated Project in whole or in part.	Not applicable



Condition #	Details and Follow-Up of Conditions	Status of Implementation
	Follow-up on condition There has been no transfer of ownership, custody, control or management of the project, in whole or in part.	
	Changement au projet désigné	
	If the Proponent is proposing to carry out the Designated Project in a manner other than described in condition 1.8, the Proponent shall notify the Agency in writing in advance. As part of the notification, the Proponent shall provide:	
	 a description of the proposed change(s) to the Designated Project and the environmental effects that may result from the proposed change(s); any modified or additional measure to mitigate any environmental effect that may result from the proposed change(s) and any modified or additional follow-up requirement; and 	
2.16 2.16.1 2.16.2 and 2.16.3	 an explanation of how, taking into account any modified or additional mitigation measure referred to in condition 2.16.2, the environmental effects that may result from the proposed change(s) may differ from the environmental effects of the Designated Project identified during the environmental assessment. 	Ongoing
	Follow-up on condition	
	On January 17, 2024, a first notice of modification to the project was sent to the IAAC to present the updated development plan for the project, as well as updated areas of affected habitat. The main modification is the relocation of the west stockpile.	
	Inadvertently, representatives of the Cree Nation Government were not added to the distribution list for the project amendment notice. The notice was sent to them on May 9, 2024, at the same time as the additional information requested by the IAAC on April 25, 2024 (see follow-up to condition 2.17).	
2.17	The Proponent shall submit to the Agency and the Cree Nation Government any additional information required by the Agency about the proposed change(s) referred to in condition 2.16, which may include the results of consultation with First Nations and relevant authorities on the proposed change(s) and environmental effects referred to in condition 2.16.1 and the modified or additional mitigation measures and follow-up requirements referred to in condition 2.16.2.	Ongoing
	Follow-up on condition	
	Following the project modification notice sent on January 17, 2024, the IAAC sent a request for additional information on April 25, 2024. The requested information was sent to the IAAC and the Cree Nation Government on December 13, 2024.	



2.3. FISH AND FISH HABITAT

Condition #	Details and follow-up of conditions	Status of Implementation
	Fish and Fish Habitat	
3.1	The Proponent shall develop, to the satisfaction of Fisheries and Oceans Canada and in consultation with First Nations, an offsetting plan to mitigate residual adverse effects on fish and fish habitat pertaining to the harmful alteration, destruction or disturbance of fish habitat, and the death of fish associated with carrying out the Designated Project. The Proponent shall implement the offsetting plan and submit the offsetting plan approved by Fisheries and Oceans Canada to the Agency and the Cree Nation Government before implementing it.	Ongoing
	Follow-up on condition The fish and fish habitat compensation plan was approved by Fisheries and Oceans Canada (DFO) on August 9, 2024. The approved compensation plan was submitted to the Agency and the Cree Nation Government on August 28, 2024. Implementation of the plan is scheduled before December 31, 2026, as required by DFO in its authorization under paragraphs 34.4(2)(b) and 35(2)(b) of the Fisheries Act.	
	For any fish habitat offset measure proposed in any compensation plan referred to in condition 3.1 that could result in adverse environmental effects that were not taken into account in the environmental assessment, the Proponent shall develop and implement, after consulting First Nations and relevant authorities, measures to mitigate these effects. The Proponent shall present these measures to the Agency and the Cree Nation Government before implementing them.	
3.2	Follow-up on condition	Ongoing
	The DFO-approved compensation plan includes measures and standards designed to avoid or mitigate impacts related to the implementation of the compensation project. This compensation plan has been submitted to the Agency and the Cree Nation Government. DFO's authorization under paragraphs 34.4(2)(b) and 35(2)(b) of the <i>Fisheries Act</i> also sets out a series of conditions that must be met when implementing the compensation plan.	
3.3 3.3.1 3.3.2 3.3.3 3.3.4	The Proponent shall manage mine effluents before their release into the environment, taking into account the Metal and Diamond Mining Effluent Regulations and the pollution prevention provisions of the Fisheries Act. For this purpose, the Proponent shall:	Not applicable



Condition #	Details and follow-up of conditions	Status of Implementation
3.3.5 3.3.6 3.3.7 3.3.8 3.3.9	 install the water treatment plant as soon as water treatment is necessary and ensure it is operational as long as water treatment is necessary; install ditches surrounding the mine infrastructures (notably the waste rock and tailings stockpiles, the overburden stockpile, the industrial sector and the hauling roads) to collect the drainage, dewatering and runoff water from the site and route it to the north water management pond, and treat the water before its release into the environment; construct ditches in a manner that prevents any overflow of drainage, dewatering and runoff water; construct the ore stockpile, its peripheral ditch, and the industrial water pond by using an impermeable lining to recover the runoff water and limit infiltration, and maintain the lining during all the phases of the Designated Project. The Proponent shall consult relevant authorities when deciding on the type of lining used; use the water collected pursuant to condition 3.3.4 to supply the mill and treat all non-reusable water collected pursuant to condition 3.3.4 before its release into the environment; construct the north water management pond with an impermeable lining or in a manner that the percolation flow does not allow water in the management pond to reach the groundwater table; install a pond with an impermeable lining to collect water coming from the concrete plant; treat any water coming from the concrete plant, the waste rock extraction area and the explosives plant area before its release into the environment; and recover the sludge from the water treatment plant and dispose of it in the waste rock and tailings storage areas. 	
	implemented to meet conditions 3.3.1 to 3.3.9 are not applicable for the period covered by this report.	
	The Proponent shall develop, prior to construction, and implement during all the phases of the Designated Project, measures to mitigate the Designated Project's effects on surface and groundwater water levels. In doing so, the Proponent shall:	
	Follow-up on condition	
3.4	GLCI has developed an environmental and social follow-up program that includes procedures for monitoring surface and groundwater levels. The follow-up program was finalized in 2024, prior to project construction.	Ongoing
	Monitoring of surface and groundwater levels was carried out in 2024. Details of surface water level monitoring are presented in condition 3.19, while details of groundwater level monitoring are presented in condition 3.18.	



Condition #	Details and follow-up of conditions	Status of Implementation
	operate the water treatment plant in a manner that replicates the natural flow variations of watercourse CE2, taking into account the storage capacity of the north water management pond;	
3.4.1	Follow-up on condition	Not applicable
	As the water treatment plant has not yet been built, the actions required to meet this condition are not applicable for the period covered by this report.	
	install a network of wells on the periphery of mine infrastructures to measure the level of the groundwater table; and	
	Follow-up on condition	
3.4.2	In 2024, 18 wells were installed to complete the network of wells around the planned mining infrastructures.	Ongoing
	Appendix B presents the work carried out to install these wells, and Map 1 in Appendix B shows the location of new wells.	
	Since the installation of the well network, two wells have been destroyed: BH-50 and 24-PO26. In 2025, new wells will be installed near the location of these former wells.	
	perform the development work likely to affect the hydraulicity of the watercourse outside of the snowmelt period, from April 15 to June 15.	
3.4.3	Follow-up on condition	Completed
	The development work likely to affect watercourse hydraulicity carried out in 2024 involved the installation of a culvert on CE3 watercourse. The work took place from October 8 to December 20.	
3.5	The Proponent shall not use materials that are, or may be, acid-generating or metal-leaching in the construction of roads. If non-acid generating or non-metal leaching materials are not available, the Proponent shall implement all measures to mitigate effects on groundwater quality by the construction of the hauling roads presented in the Alphard Group technical opinion included in Appendix A of the technical note on complementary information concerning haul roads (Canadian Impact Assessment Registry, reference number 80141, document number 51) and supplemented or modified in the Englobe second opinion document included in the document titled Compte-rendu de la réunion multipartite avec le comité conjoint d'évaluation (Agence d'évaluation d'impact du Canada et Gouvernement de la Nation Crie) concernant la conception des routes de halages (Canadian Impact Assessment Registry, reference number 80141, document number 58) during all phases of the Designated Project. In particular, the proponent shall:	Ongoing



Condition #	Details and follow-up of conditions	Status of Implementation
	Follow-up on condition	
	As part of the pre-construction work, an access road of approximately 1.5 km was built from the future industrial area to the CE3 watercourse. This road was necessary to allow installation of the culvert over the CE3. This access road corresponds to the foundations of the future haul road. A total of 47,205 m³ of non-leachable material from the industrial sector was used. The additional geochemical characterization carried out in 2023 on mine waste rock and unconsolidated deposits (WSP, 2023) and presented in Appendix E-3 of the 2023 Annual Report confirms that the unconsolidated deposits sampled are not considered leachable and are not potentially acid-generating. No waste rock was used in the construction of this access road.	
3.5.1	identify, prior to construction, all roads that will be constructed with waste rock, including the hauling roads, access roads, temporary roads and circulation road, and identify the roads that will be constructed with a geomembrane;	Completed
	Follow-up on condition	
	This condition was completed in 2023; information on compliance with this condition is presented in the 2023 Annual Report.	
	install a geomembrane for all haul roads constructed with waste rock, except for the hauling roads constructed on stockpiles or in the ditch;	
3.5.2	Follow-up on condition	Not applicable
0.0.2	No waste rock was used in the construction of the access road.	Not applicable
	A geomembrane will be installed at the appropriate time, when waste rock is used to build the haul road.	
	carry out, before undertaking work related to the hauling roads, piezometric monitoring at the wells identified on Map 2 of the document titled From Galaxy Lithium (Canada) Inc. to the Impact Assessment Agency of Canada regarding the James Bay Lithium Mine Project - Response to the Information Request (Canadian Impact Assessment Registry, reference number 80141, document number 45), in order to validate the direction of groundwater flow;	
3.5.3	Follow-up on condition	Completed
	Piezometric monitoring of the wells installed in winter 2024 was carried out. The results of this monitoring are presented in Appendix B. Water levels were also monitored during the three sampling campaigns carried out as part of the groundwater quality follow-up program. The results are presented in Appendix C.	
	This monitoring validated the direction of groundwater flow. In fact, the flow directions observed during each campaign were the same as those observed during previous field campaigns.	



Condition #	Details and follow-up of conditions	Status of Implementation
3.5.4 3.5.4.1 3.5.4.2 3.5.4.3 3.5.4.4	 include the following elements in the engineering details for the road design: drainage under the geomembrane on both sides of the ditches; protection of the geomembrane from the roadbed; drainage of ditches; and cleaning and maintenance of ditches. Follow-up on condition This condition was completed in 2023; information on compliance with this condition is presented in the 2023 Annual Report. 	Completed
3.5.5	construct the drainage sand layer with a steep drainage slope of a minimum of 4%; Follow-up on condition Construction of the haul road with the sand layer has not yet begun. This condition is therefore not applicable for the period covered by this report.	Not applicable
3.5.6	develop and implement measures to control leaching of the drainage sand layer if leaching is observed; Follow-up on condition Construction of the haul road with the sand layer has not yet begun. This condition is therefore not applicable for the period covered by this report.	Not applicable
3.5.7	develop and implement a quality control plan for the construction of hauling roads, including control points during the installation of the geomembrane and validating the properties of the material used; Follow-up on condition GLCI has developed a monitoring and quality assurance program for geomembrane waterproofing on haul roads. This program includes control points during geomembrane installation and validation of the properties of the material used. The program was developed in January 2024 and revised in January 2025. The most recent version is presented in Appendix D. As construction of the haul roads has not yet begun, implementation of this control plan is not applicable for the period covered by this report.	Ongoing
3.5.8	install a drainage sand layer, the geomembrane and the waste rock once the first layer of soil has been consolidated and postpone work if land surveys show that consolidation is not yet achieved after 120 days; Follow-up on condition Construction of the haul road has not yet begun. This condition is therefore not applicable for the period covered by this report.	Not applicable



Condition #	Details and follow-up of conditions	Status of Implementation
3.5.9	carry out the installation and welding of the geomembrane only when the ambient temperature is above 0 degrees Celsius;	
	Follow-up on condition	Not applicable
	Construction of the haul road with geomembrane has not yet begun. This condition is therefore not applicable for the period covered by this report.	
	keep the geomembrane in good working order and maintain the ditches in such a way as to prevent damage to the geomembrane, including by:	
3.5.10 3.5.10.1 3.5.10.2 3.5.10.3	 evaluating the state of the ditches during snowmelt each spring; identifying the maintenance measures to be implemented; establishing a water balance during snowmelt; and identifying any malfunction with the geomembrane or the ditches and applying maintenance measures. 	Not applicable
3.5.10.4	Follow-up on condition	
	Construction of the haul road has not yet begun. This condition is therefore not applicable for the period covered by this report.	
	The Proponent shall maintain, during all the phases of the Designated Project, a buffer zone of undisturbed vegetation on the edge of every waterbody and watercourse, excluding the cleared areas required to build the components of the Designated Project. The Proponent shall perform work or activities within the buffer zone only if necessary for safety reasons or to implement and maintain any element of the Designated Project.	Ongoing
3.6	Follow-up on condition	Ongoing
	During work carried out at the site this year, a buffer zone of undisturbed vegetation was maintained along the edges of water bodies and watercourses. Only the area of the CE3 watercourse, where the culvert was installed, had to be cleared (see map in Appendix E, buffer zone identified as reference strip).	
3.7	The Proponent shall develop the temporary facilities more than 60 metres from the high water mark of the watercourse and lakes, with the exception of the east waste rock stockpile, which crosses a segment of an intermittent watercourse draining into Lac Kapisikama.	
	Follow-up on condition	Ongoing
	Temporary facilities were set up at more than 60 meters from the highwater mark of watercourses in the industrial sector of the mine (see the area identified in brown on the map in Appendix E).	
3.8	The Proponent shall install any culvert or crossing structure required for the Designated Project so as to maintain the free flow of water and the free passage of fish when the free flow of water and the free passage of fish are required.	Completed



Condition #	Details and follow-up of conditions	Status of Implementation
	Follow-up on condition The culvert in the CE3 was installed so as to maintain free water flow and fish passage.	
3.9	The Proponent shall, during all phases of the Designated Project, manage the tailings and materials that are or may be acid-generating or metalleaching. For this purpose, the Proponent shall:	
	Follow-up on condition Characterization work on acid rock drainage potential and metal leaching from overburden carried out in 2023 (see Appendix E-3 of the 2023 Annual Report) shows that the unconsolidated deposits collected in the industrial sector are not considered leachable or potentially acid-generating.	Ongoing
3.9.1	characterize, before construction, the acid rock drainage and metal leaching potential of overburden metals and other mine rocks used in construction;	
	Follow-up on condition This condition was completed in 2023; information on compliance with this condition is presented in the 2023 Annual Report.	Completed
3.9.2	carry out geochemical analyses of waste rock and tailings during operation, including a mixture representative of waste rock and tailings co-disposition, to verify the magnitude and inception of potential acid rock drainage and metal leaching in the waste rock and tailings;	Not applicable
	Follow-up on condition As the mine is not yet in operation, the actions required to meet this condition are not applicable for the period covered by this report.	тот оррановано
3.9.3	prepare, taking into account the geochemical analysis referred to in condition 3.9.2, segregation procedures for potentially acid-generating or metal-leaching materials and additional mitigation measures for storage of waste rock, low-grade ore and other ores; and	Not applicable
	Follow-up on condition As the mine is not yet in operation, the actions required to meet this condition are not applicable for the period covered by this report.	- гот арриоавіо
3.9.4	not use acid-generating, potentially acid-generating or metal leaching materials for construction purposes, except for the exception referred to in condition 3.5.	Ongoing



Condition #	Details and follow-up of conditions	Status of Implementation
	Follow-up on condition As mentioned in condition 3.9, the characterization work on acid rock drainage potential and metal leaching from overburden carried out in 2023 (see Appendix E-3 of the 2023 Annual Report) shows that the unconsolidated deposits collected in the industrial sector are not considered leachable and are not potentially acid-generating.	
3.10 3.10.1 3.10.2 3.10.3	The Proponent shall develop, prior to construction, and implement measures to manage soil excavated as part of the Designated Project to mitigate the adverse environmental effects on fish and fish habitat, including by applying the principle of non-degradation of soil to all reused soils and by managing soils that present potential for contamination so that they do not constitute a new source of contamination for the environment. In doing so, the Proponent shall: • manage soils according to their degree of contamination, based on the results of the characterization conducted in the Étude spécialisée sur la teneur de fond naturelle dans les sols (Canadian Impact Assessment Registry, reference number 80141, document number 18) and the Mise à jour de l'étude spécialisée sur la teneur de fond naturelle dans les sols (Canadian Impact Assessment Registry, reference number 80141, document number 33); • submit to the Agency, prior to construction, the measures developed by the Proponent for the management of the characterized soils pursuant to condition 3.10.1; and • dispose of all excess or unusable soil and manage any soil that must be stockpiled temporarily so that it does not adversely affect the aquatic environment.	Ongoing
	Follow-up on condition GLCI has prepared a technical note on soil management, which was submitted to the AEIC on January 3, 2024. This note summarizes the results of the soil characterization work that has been carried out since the project began and presents appropriate management measures based on the characterization results obtained. When work was carried out at the site, soil was stored in such a way as not to adversely affect the aquatic environment. For example, sediment barriers were installed where there was a greater likelihood of reaching the aquatic environment, and increased monitoring was carried out by environmental supervisors.	
3.11	The Proponent shall carry out construction work in water only during the timing windows defined for the region of the Designated Project and according to the species present in Fisheries and Oceans Canada's Timing Windows for Carrying out Work in Fish Habitat According to Quebec Administrative Regions, unless authorized to do so by Fisheries and Oceans Canada.	Ongoing

Condition #	Details and follow-up of conditions	Status of Implementation
	Follow-up on condition	
	The authorization under paragraphs 34.4(2)(b) and 35(2)(b) of the <i>Fisheries Act</i> , issued by DFO on August 9, 2024, allowed the culvert to be installed in the CE3 between August 9, 2024, and December 31, 2045, without taking into account low-risk periods for work in fish habitat. Thus, the culvert was installed between October 8 and December 20, 2024. The next in-water construction work will be related to the fish and fish habitat compensation project. This work will be carried out between July 15 and April 15, outside the sensitive period for northern pike. This work is scheduled for 2026.	
	The Proponent shall carry out deforestation of the water crossing areas immediately before the beginning of construction activities in these areas.	
	Follow-up on condition	
3.12	Tree clearing activities in the CE3 crossing area were carried out in April 2024, 6 months prior to culvert installation activities, as provincial authorities required GLCI to prohibit all clearing activities between May 1 and August 15 to limit impacts on avian fauna during the main nesting periods. This commitment is found in the document "Addendum - RE: Demande de consultation et d'engagements, projet de mine de lithium Baie-James", dated June 28, 2023, which forms part of the provincial Certificate of Authorization issued on December 27, 2023. Based on initial discussions with DFO, Fisheries and Oceans Canada had originally planned an authorized period for the installation of the culvert on the CE3 from June 1 to September 30. It was therefore decided to carry out the tree clearing a few weeks before the in-water work began. Finally, DFO authorization was received on August 9, 2024, with no restrictions on respecting the low-risk periods for fish habitat work associated with the installation of the culvert on CE3. However, it was still necessary to meet our commitment towards the provincial authorities.	Completed
3.13 3.13.1 3.13.2 3.13.3 3.13.4	The Proponent shall implement, during all phases of the Designated Project, measures to control erosion and sedimentation in the Designated Project area in order to prevent effects on water quality in waters frequented by fish, in accordance with the requirements of the Fisheries Act. The Proponent shall take into account flood, heavy precipitation and frost periods when developing and implementing the measures and shall maintain these measures regularly to repair any damaged measure as soon as possible. Among these measures, the Proponent shall: • construct permanent retention ponds and temporary sedimentation ponds; • develop and implement mitigation measures to prevent particles coming from the erosion of accumulation areas from reaching watercourse CE3; • stabilize and protect the exposed surfaces in a Ongoing manner as soon as possible to reduce transport of suspended particulate matter and limit leaching of materials to the aquatic environment; and • install sediment barriers, or any other equivalent equipment, over	Ongoing



Condition #	Details and follow-up of conditions	Status of Implementation
	particularly along watercourses and ditches, on the periphery of work areas, at the bottom of embankments and around piles of unconsolidated materials, so as to capture all the runoff water during all phases of the Designated Project.	
	Follow-up on condition	
	Where water was pumped into the natural environment, sedimentation pockets were used within the hoses. Temporary retention basins were also used to allow for suspended sediments to settle before release to the environment, and where appropriate, sediment barriers were installed.	
3.14	The Proponent shall install a temporary passage when any machinery and vehicles must cross a watercourse, if a bridge or crossing is not already present, to ensure that any crossing of a watercourse is done at fixed and developed locations.	Completed
5.14	Follow-up on condition	Completed
	Wooden mats were used as temporary passageways on the CE3 to ensure safe passage for vehicles digging the diversion canal.	
	The Proponent shall take into account Fisheries and Oceans Canada's Guidelines for the use of explosives in or near Canadian fisheries waters when undertaking blasting activities.	
	Follow-up on condition	
3.15	The blasting procedure was developed and presented in the 2023 Annual Report.	Not applicable
	Considering that no blasting activity started in 2024, the actions to be implemented to meet this condition are not applicable for the period covered by this report.	
	The Proponent shall operate the explosives plant in a manner that ensures there is no discharge into the environment in order to mitigate the environmental effects on fish and fish habitat, particularly by:	
3.16 3.16.1 3.16.2 3.16.3	 recovering the sanitary releases of the explosives plant in a sealed pit in order to have them managed offsite by an accredited firm; recovering the used oils and other non-recyclable discharge in order to have them managed offsite by an accredited firm; and washing the trucks containing explosives inside the explosives plant and sending the wash water to the oil separator to be filtered and recycled. 	Not applicable
	Follow-up on condition	
	As construction of the explosives factory has not yet begun, the actions required to meet this condition are not applicable for the period covered by this report.	



Condition #	Details and follow-up of conditions	Status of Implementation
3.17	The Proponent shall develop, before construction and in consultation with First Nations, the Cree Nation Government, Environment and Climate Change Canada and the other relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and to determine the effectiveness of the mitigation measures pertaining to the adverse environmental effects on fish from changes to surface water quality caused by the Designated Project. The Proponent shall implement the follow-up program during all phases of the Designated Project. As part of the follow-up program, the Proponent shall:	
	Follow-up on condition GLCI has developed an environmental and social follow-up program in consultation with the First Nations, the Cree Nation Government, Environment and Climate Change Canada and other competent authorities. Section 5.7 of this program outlines how fish and fish habitat and surface water quality will be monitored to meet the requirements of this condition. The program was sent to stakeholders for comment in 2023, and comments received were incorporated. The document was finalized in 2024, prior to project construction. Implementation of the follow-up program began in light of the pre-construction activities that took place at the site this year. Surface water quality monitoring results are presented in Appendix F.	Ongoing
3.17.1 3.17.2	monitor the water quality in watercourses CE1, CE2, CE3, CE4, CE5, and Asiyan Akwakwatipusich Lake, including suspended particulate matter, and concentrations of lithium, fluoride, silver, arsenic, cadmium, chromium, lead, nickel, iron, zinc, mercury and copper; and 3.17.2 carry out the monitoring referred to in condition 3.17.1 by taking water samples around the effluent entry point into the final release point in watercourse CE2 and at least one sampling point in each of watercourses CE1, CE2, CE3, CE4 and CE5 identified in Map 6-8 of the revised Environmental Impact Statement (Canadian Impact Assessment Registry, reference number 80141, document number 33). The Proponent shall determine, for the monitoring in Asiyan Akwakwatipusich Lake, the location of at least one sampling point during the preparation of the follow-up program.	Ongoing
	Follow-up on condition Water quality was monitored in streams CE1, CE2, CE3, CE4, CE5 and Lake Asiyan Akwakwatipusich. Three sampling campaigns were carried out. Surface water quality monitoring results are presented in Appendix F.	



Condition #	Details and follow-up of conditions	Status of Implementation
	The Proponent shall develop, prior to construction and in consultation with First Nations, the Cree Nation Government, Environment and Climate Change Canada and the relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and to determine the effectiveness of mitigation measures pertaining to the adverse environmental effects on fish and fish habitat from changes to groundwater quality caused by the Designated Project. The Proponent shall implement the follow-up program during all phases of the Designated Project. As part of the follow-up program, the Proponent shall:	
	Follow-up on condition	
3.18	GLCI has developed an environmental and social follow-up program in consultation with the First Nations, the Cree Nation Government, Environment and Climate Change Canada and the relevant authorities. Section 4 of this program outlines groundwater monitoring procedures to verify the accuracy of the environmental assessment and to assess the effectiveness of mitigation measures with respect to adverse environmental effects on fish and fish habitat.	Ongoing
	The follow-up program was sent to stakeholders for comment in 2023, and the comments received have been incorporated.	
	The program was finalized in 2024, prior to project construction. The implementation of the program began in 2024. The results are presented in Appendix C.	
	implement a network of monitoring wells around facilities that may affect groundwater quality, including hauling roads. The monitoring wells must be installed upstream and downstream of each facility that may affect groundwater quality;	
	Follow-up on condition	
3.18.1	A total of 36 wells located upstream and downstream of future stockpiles, ponds, pit, roads and industrial area will be used to measure groundwater levels: 3 wells installed prior to the issuance of the Decision Statement, 15 wells installed in the winter of 2023 and 18 wells installed in the winter of 2024. Map 1 in Appendix B shows the location of these wells.	Completed
	Since the installation of the well network, two wells have been destroyed: BH-50 and 24-PO26. In 2025, new wells will be installed near the location of these former wells.	
3.18.2	monitor, from the beginning of construction and during all the phases of the Designated Project, at a frequency of at least once every three months, the concentrations of substances measured by the Proponent in the context of the environmental assessment and presented in Table 18 of the Étude spécialisée en hydrologéologie of the Environmental Impact Statement (Canadian Impact Assessment Registry, reference number 80141, document number 18) in the groundwater monitoring wells determined pursuant condition 3.18.1; and	Ongoing



Condition #	Details and follow-up of conditions	Status of Implementation
	Follow-up on condition Considering that work at the site began in March 2024, groundwater quality monitoring was carried out on 3 occasions. The results of this monitoring are presented in Appendix C.	
3.18.3	develop and implement modified or additional mitigation measures if the concentrations measured in accordance with condition 3.18.2 demonstrate concentrations greater than those measured by the proponent as part of the environmental assessment and presented in Table 18 of the Étude spécialisée sur l'hydrogéologie (Canadian Impact Assessment Registry, reference number 80141, document number 18).	Not applicable
	Follow-up on condition At present, the data collected does not allow us to demonstrate that the concentrations measured in groundwater are higher than those measured in the environmental assessment. No modified or additional mitigation measures are deemed necessary at this stage of the project.	
3.19	The Proponent shall develop, prior to construction and in consultation with First Nations and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and to determine the effectiveness of the mitigation measures pertaining to the adverse environmental effects on fish and fish habitat from changes to water levels and water discharge rates caused by the Designated Project. The Proponent shall implement the follow-up program from the beginning of construction to at least three years after the end of progressive reclamation activities. As part of the follow-up program, the Proponent shall monitor water discharge flows, including the low water discharge rates, and the water levels in watercourses CE2, CE3 and CE4 at locations identified in consultation with First Nations. The Proponent shall identify its monitoring locations on a map.	
	Follow-up on condition GLCI has developed an environmental and social follow-up program in consultation with the First Nations, the Cree Nation Government, Environment and Climate Change Canada and the relevant authorities. Section 5.10 of this program describes how water levels and flows will be monitored to verify the accuracy of the environmental assessment and to assess the effectiveness of mitigation measures. The program was sent to stakeholders for comment in 2023, and the comments received have been incorporated. The program was finalized in 2024, prior to project construction. Implementation of the follow-up program began in 2024. The results are presented in Appendix G.	Ongoing



Condition #	Details and follow-up of conditions	Status of Implementation
	The Proponent shall develop, prior to operation and in consultation with First Nations and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment as it pertains to the physicochemical characterization of the mining materials and the adverse environmental effects associated with management of the mining materials on surface water and groundwater quality. The Proponent shall implement the follow-up program during operation and decommissioning. As part of the follow-up program, the Proponent shall:	
3.20 3.20.1 3.20.2	 monitor, during operation and decommissioning, the physicochemical quality of sediment at the sampling points identified pursuant to condition 3.17.2; and carry out a physicochemical characterization of the ore extracted during operation, and the waste rock and tailings, including a mixture representative of waste rock and tailings co-disposition, during operation and decommissioning. 	Not applicable
	Follow-up on condition As the mine is not yet in operation, the actions required to meet this condition are not applicable for the period covered by this report.	
	The Proponent shall develop, prior to construction and in consultation with First Nations and the relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and to determine the effectiveness of mitigation measures as it pertains to acid rock drainage and metal leaching in the aquatic environment. The Proponent shall implement the follow-up program during operation and decommissioning. As part of the implementation of the follow-up program, the Proponent shall:	
	Follow-up on condition	
3.21	GLCI has developed an environmental and social follow-up program in consultation with First Nations and the relevant authorities. Section 6 of this follow-up program outlines monitoring procedures to verify the accuracy of the environmental assessment and to assess the effectiveness of mitigation measures with respect to acid mine drainage and metal leaching into the aquatic environment. This monitoring will be carried out during project operation and decommissioning.	Ongoing
	The follow-up program was sent to stakeholders for comment in 2023, and the comments received have been incorporated.	
	The follow-up program was finalized in 2024, prior to project construction. It will be implemented during project operation and decommissioning.	
	 carry out a geochemical characterization of the waste rock, tailings and ore, including a mixture representative of waste rock and tailings co-disposition; and 	
3.21.1 3.21.2	 3.21.2 compare the results of the characterization referred to in condition 3.21.1 to the initial geochemical characterization undertaken by the Proponent as part of the environmental assessment and presented in the revised Environmental Impact Statement (Canadian Impact Assessment Registry, reference number 80141, document number 33) and determine, in 	Not applicable



Condition #	Details and follow-up of conditions	Status of Implementation
	consultation with relevant authorities and taking into account the results of the water quality follow-up referred to in conditions 3.17 and 3.18, if modified or additional mitigation measures are necessary. If applicable, the Proponent shall update the progressive reclamation measures referred to in condition 8.16. The Proponent shall submit the results of the follow-up program to Health Canada and the Cree Board of Health and Social Services of James Bay.	
	Follow-up on condition	
	As the mine is not yet in operation, the actions to be implemented to meet this condition are not applicable for the period covered by this report.	

2.4. MIGRATORY BIRDS

Condition #	Details and follow-up of conditions	Status of Implementation
	Migratory Birds	
4.1	The Proponent shall carry out the Designated Project, including clearing and blasting, in a manner that protects migratory birds and avoids injuring, killing or harassing migratory birds or destroying, taking, or disturbing their eggs, or damaging, destroying, removing or disturbing their nests. In this regard, the Proponent shall take into account Environment and Climate Change Canada's Guidelines to avoid harm to migratory birds.	Ongoing
	Follow-up on condition Environment and Climate Change Canada's Guidelines to avoid harm to migratory birds are taken into consideration during project implementation. Clearing activities took place from March 20 to April 11, 2024, to avoid the migratory bird nesting period. Blasting activities have not yet begun.	
4.2	The Proponent shall develop and implement, in consultation with Environment and Climate Change Canada, the Cree Nation Government, the Cree Nation of Eastmain and the tallyman of trapline RE02, mitigation measures to avoid the destruction, disturbance or removal of nests, including by the implementation of setback buffer zones if active migratory bird nests are found during construction. The Proponent shall establish any setback buffer zone by taking into account the intensity, duration, frequency and proximity of the activity associated with the Designated Project that could hinder bird nesting. The Proponent shall present these measures to the Agency and the Cree Nation Government before implementing them.	Ongoing
	Follow-up on condition GLCI has committed to refraining from tree cutting between May 1 and August 15, in order to minimize the impact on avian fauna during the main nesting periods. In addition, no active migratory bird nests were identified during site activities this year. No specific mitigation measures were	



Condition #	Details and follow-up of conditions	Status of Implementation
	deemed necessary to avoid the destruction, disturbance or removal of nests.	
4.3	The Proponent shall limit deforestation, soil stripping and flush cutting in the mine site development area, as identified in Figure 5 of the Environmental Assessment Report prepared by the Impact Assessment Agency of Canada (Canadian Impact Assessment Registry, reference number 80141).	
	Follow-up on condition The group covered by tree clearing activities are shown on Map 2. Soil	Ongoing
	The areas covered by tree clearing activities are shown on Map 2. Soil stripping was limited to the industrial sector of the site and the access road to CE3 watercourse. These areas are identified in brown on the map in Appendix E.	
	The Proponent shall control the lighting necessary for Designated Project activities during all phases of the Designated Project, including its orientation, duration of use and intensity, in order to prevent injuring, killing or harassing migratory birds and birds that are listed species at risk due to sensory disturbances attributable to light, while complying with operational heath and safety requirements.	
4.4	Follow-up on condition	Ongoing
4.4	The lighting on the project site is limited to what is necessary for the safe and efficient performance of activities, considering lighting design guidelines.	
	To avoid adverse effects on migratory birds, only the lighting required for safe construction activities has been installed. For safety reasons, it was necessary to keep the lights on every night. Where possible, the lights provided downward illumination.	
4.5	The Proponent shall develop, in consultation with the relevant authorities and taking into account Environment and Climate Change Canada's Beneficial Management Practices, and implement, from the beginning of operation, measures to prevent migratory birds and birds that are listed species at risk from using the water management ponds.	Not applicable
	Follow-up on condition	
	As the water management basins have not yet been built, the actions to be implemented to meet this condition are not applicable for the period covered by this report.	
4.6	The Proponent shall develop, taking into account Environment and Climate Change Canada's document Bank Swallow (Riparia riparia): in sandpits and quarries, and implement measures to avoid use of the borrow pit by bank swallow (Riparia riparia).	Ongoing



Condition #	Details and follow-up of conditions	Status of Implementation
	Follow-up on condition	
	Measures were developed to prevent the use of borrow pits by Bank Swallows. These measures were presented to the contractor prior to the start of work, but no monitoring of the implementation of the measures was carried out. However, no mention of the species was reported in the local study area during inventories carried out in 2023 and 2024, despite particular attention paid to the project's borrow pits.	
	It is also important to note that an insignificant quantity of material was removed from the sandpit in 2024, mainly from the bottom of the slope. There was therefore no inspection, since the risk of disturbing Bank Swallows' nests was considered low at the time.	
	The Proponent shall offer regular awareness training on the presence of migratory bird nests and the measures to be implemented in the event of discovery of nests for all employees and contractors associated with the Designated Project who may encounter nests. As part of the training, the Proponent shall educate employees and contractors associated with the Designated Project on the need to report any use of water management ponds by avian wildlife to the environmental officer designated by the Proponent. The Proponent shall document the participation of employees and contractors in the training.	
4.7	Follow-up on condition	Ongoing
	GLCI has developed a program to raise awareness of the presence of migratory bird nests and the measures to be implemented in the event of their discovery. Virtual environmental and occupational health and safety training sessions are mandatory for all employees and contractors prior to their arrival on site. In addition, during meetings with contractors prior to their mobilization to the worksite, they are given further training and are also informed of the measures to be taken in the event of nest discovery. A register of those who have received training is kept by the Human Resources department.	
4.8	The Proponent shall develop, prior to construction and in consultation with Environment and Climate Change Canada and the Cree Nation Government, and implement during all phases of the Designated Project, a follow-up program to verify the accuracy of the environmental assessment and to determine the effectiveness of the mitigation measures pertaining to adverse environmental effects on migratory birds and birds that are listed species at risk, their eggs and their nests caused by the Designated Project. The follow-up program includes the mitigation measures implemented to satisfy conditions 4.1 to 4.7. As part of the development of the follow-up program, the Proponent shall determine the criteria that will be used to determine the effectiveness of mitigation measures. As part of the implementation of the follow-up program, the Proponent shall:	Ongoing



Condition #	Details and follow-up of conditions	Status of Implementation
	Follow-up on condition	
	GLCI has developed an environmental and social follow-up program in consultation with Environment and Climate Change Canada and the Cree Nation Government. Section 9 of this program outlines monitoring procedures for verifying the accuracy of the environmental assessment and judging the effectiveness of mitigation measures with respect to adverse environmental effects on migratory birds and birds that are listed species at risk, their eggs and nests caused by the designated project. The follow-up program includes mitigation measures implemented to meet conditions 4.1 to 4.7.	
	The program was sent to stakeholders for comments in 2023, and comments received were incorporated. It was finalized in 2024, prior to project construction.	
	Implementation of this program began in 2024. The results are presented in Appendix H.	
	update, prior to construction, the avian wildlife inventories completed by the Proponent and presented in l'Étude spécialisée sur les faunes terrestre et avienne of the Environment Impact Statement. The Proponent shall present the update of the inventories to the Agency and the Cree Nation Government prior to construction;	
4.8.1	Follow-up on condition	Completed
	GLCI carried out an update of the avian fauna inventories (2017 inventory update completed and presented in the study on terrestrial and avian fauna in the environmental impact study). This update was completed in August 2023. The inventory update report was presented in the 2023 Annual Report. This report was also sent to the AEIC and the GNC on January 3, 2024.	



Condition #	Details and follow-up of conditions	Status of Implementation
4.8.2 4.8.3 4.8.4 4.8.5 4.8.6	 have a qualified individual conduct surveys every five years, from the beginning of construction and during all phases of the Designated Project, to confirm the presence of migratory birds and birds that are listed species at risk, including Canada warbler (Cardellina canadensis), olive-sided flycatcher (Contopus cooperi), rusty blackbird (Euphagus carolinus), common nighthawk (Chordeiles minor), short-eared owl (Asio flammeus), bank swallow (Riparia riparia), red-necked phalarope (Phalaropus lobatus), yellow rail (Coturnicops noveboracensis) and hudsonian godwit (Limosa haemastica). The Proponent shall have the surveys carried out in the Designated Project area and in the safety perimeter and use the avian wildlife inventory sites identified on Map 3 of the l'Étude spécialisée sur les faunes terrestre et avienne of the Environment Impact Statement in order to locate the inventory stations. monitor any use of the water management ponds by avian wildlife reported by employees and contractors pursuant to condition 4.7 in order to determine the effectiveness of mitigation measures referred to in condition 4.5; monitor any use of the borrow pits by bank swallow (Riparia riparia) in order to determine the effectiveness of mitigation measures referred to in condition 4.6; develop and implement modified or additional mitigation measures if the results of the monitoring conducted under the follow-up program show that modified or additional mitigation measures are required to avoid harming migratory birds, including migratory birds that are listed species at risk, their eggs and their nests; and update the follow-up program in accordance with condition 2.7 if species identified by the Committee on the Status of Endangered Wildlife in Canada and listed in the Species at Risk Act change status during the implementation of the Designated Project. 	Ongoing
	Follow-up on condition Since work has been carried out on the site, monitoring of the avian fauna has begun. Surveys were conducted by WSP to confirm the presence of migratory birds and birds that are listed species at risk. The results are presented in Appendix H.	
	Monitoring of any use of the water management basins by avian fauna has not been carried out, given that the water management basins have not yet been built.	
	As for monitoring the use of borrow pits by Bank Swallows (<i>Riparia riparia</i>) to determine the effectiveness of mitigation measures referred to in condition 4.6, no mention of the species was reported in the local study area during inventories carried out in 2023 and 2024, despite particular attention paid to the project's borrow pits.	
	Finally, based on the results of monitoring activities, no modified or additional mitigation measures are deemed necessary at this stage of the project.	



2.5. LISTED SPECIES AT RISK

Condition #	Details and follow-up of conditions	Status of Implementation
	Listed Species at Risk	
	The Proponent shall prepare, prior to construction and in consultation with the Cree Nation Government, the Cree Nation of Eastmain, the tallyman of trapline RE02, Environment and Climate Change Canada, and other relevant authorities, and implement during all phases of the Designated Project, an action plan for caribou (Rangifer tarandus). As part of the implementation of the plan, the Proponent shall:	
	Follow-up on condition	
5.1	GLCI has developed a caribou action plan in consultation with the Cree Nation Government, the Eastmain Cree Nation, the RE02 tallyman, Environment and Climate Change Canada and other relevant authorities.	Ongoing
	The follow-up program was sent to stakeholders for comments in 2023, and comments received have been incorporated.	
	The action plan was finalized in 2024, before construction began, and submitted to the relevant authorities on March 18, 2024. The plan was implemented from the start of activities at the project site.	
	develop mitigation measures to be implemented in case of the presence of caribou (Rangifer tarandus) in the Designated Project area, on the access roads of the mine site and within a four-kilometre radius of the Designated Project area to mitigate the adverse environmental effects of the Designated Project on caribou (Rangifer tarandus) caused by sensory disturbances and collisions with vehicles, particularly by modifying the frequency, schedule and modality of mining and ore transportation activities;	
5.1.1	Follow-up on condition	Ongoing
	The mitigation measures to be taken will essentially be adjustments to operations to limit the risk of disturbance and collision. They will have to be determined according to the type of observation to be carried out, for example by modifying the frequency, schedule and modalities of mining and concentrate transportation activities.	
	These measures are presented in the action plan, which was finalized in 2024.	



Condition #	Details and follow-up of conditions	Status of Implementation
5.1.2 5.1.3 5.1.4 5.1.5 5.1.6 5.1.7	 offer regular awareness training to all the employees and contractors associated with the Designated Project who could encounter caribou regarding the precariousness of caribou (Rangifer tarandus), how to identify signs of their presence, the measures to be implemented in the event of the presence of caribou (Rangifer tarandus) or the sign of their presence pursuant to in condition 5.1.1, and the communication procedure referred to in condition 5.1.3; implement a communication procedure between the Proponent and the employees and contractors associated with the Designated Project to inform the Proponent of the presence of caribou (Rangifer tarandus) and to report any presence of caribou (Rangifer tarandus) to the employees and contractors associated with the Designated Project, including the ore transport truck drivers; notify the employees and the contractors associated with the Designated Project, including the ore transport truck drivers, of any presence of caribou (Rangifer tarandus) in the Designated Project area, on the access roads of the mine site and within a 500-metre radius of the Designated Project area; immediately implement the measures developed in accordance with condition 5.1.1 if the Proponent observes or is informed of the presence of caribou (Rangifer tarandus) in the Designated Project area or on the ore transport road; if the Proponent observes or is informed of the presence of caribou (Rangifer tarandus) within a four-kilometre radius of the Designated Project area, immediately implement the measures developed pursuant to condition 5.1.1 and determine, in consultation with the Cree Nation Government, the Cree Nation of Eastmain, the tallyman of trapline RE02, Environment and Climate Change Canada and other relevant authorities, if modified or additional mitigation measures are necessary and inform the tallyman of trapline RE02 of the presence of caribou (Rangifer tarandus); and participate in all regional initia	Ongoing
	Follow-up on condition A training module on caribou has been developed to raise awareness among employees and contractors of the following points: the precariousness of caribou; how to distinguish and identify signs of caribou presence; the action plan to be implemented in the event of caribou presence; the importance of reporting any caribou sightings on site (information to be gathered in the wildlife register); the importance of reporting any sightings of caribou predators (bear and wolf) near the site and its access routes, as well as the communication mechanism to be used in the event of caribou presence. This training was offered to employees and contractors likely to encounter caribou. A communication system for reporting the presence of caribou has been developed by GLCI in accordance with the EIA (WSP, 2021) and this condition. This protocol ensures that information regarding the presence of	



Condition #	Details and follow-up of conditions	Status of Implementation
	caribou is transmitted promptly to employees, contractors and drivers traveling within the mine's zone of influence, on the mine site access road and the Billy-Diamond Highway within a 500 m radius of the site, in accordance with condition 5.1.4 of the Decision Statement. The purpose of this communication protocol is to enable anyone working in the project area to ensure implementation of the mitigation measures set out in section 5.1.	
	No caribou were observed on the Billy-Diamond Highway or within a four-kilometer radius of the project area, so no measures were implemented.	
	Finally, GLCI has not yet taken part in any regional initiatives concerning the project's contribution to the environmental effects on caribou.	
	The Proponent shall educate employees and contractors associated with the Designated Project not to feed animals in the Designated Project area and to dispose of food and waste properly so as not to attract animals near the work areas.	
5.2	Follow-up on condition	Ongoing
	In the environmental training course, we mention that it is strictly forbidden to feed animals. The scale of disciplinary sanctions put in place is also mentioned in the induction training.	
	The Proponent shall develop and implement measures to prevent bears from accessing the garbage containers stored in the Designated Project area. The measures shall include installation of bear-resistant lids on waste containers	
	Follow-up on condition	
5.3	The black bear management protocol and the procedure for dealing with wildlife interactions were presented in the 2023 Annual Report.	Ongoing
	Measures to prevent bears from accessing waste containers at the site, including the installation of anti-bear lids, will be implemented when waste containers containing food are present at the site. For the time being, no domestic waste is managed directly on site, as residual materials are managed by the SDBJ.	
5.4	The Proponent shall implement measures to mitigate the effects of the Designated Project on little brown myotis (Myotis lucifugus) or Northern myotis (Myotis septentrionalis). In doing so, the Proponent shall:	
	Follow-up on condition	Ongoing
	The chiropteran follow-up program was implemented in 2024. Surveys were carried out to cover the breeding (June 15 to August 14) and autumn migration (August 15 to September 25) periods. The results are presented in Appendix I.	



Condition #	Details and follow-up of conditions	Status of Implementation
5.4.1	have a qualified person conduct a survey, in consultation with land users, to establish the presence of maternity sites and rest areas for little brown myotis (Myotis lucifugus) or Northern myotis (Myotis septentrionalis) in the Designated Project area before any deforestation or building dismantling activity carried on during the breeding period of little brown myotis (Myotis lucifugus) or Northern myotis (Myotis septentrionalis);	Ongoing
0	Follow-up on condition	31.g3g
	Tree clearing activities at the site took place between March 20 and April 11, before the breeding and fall migration periods of the little brown bat (<i>Myotis lucifugus</i>) or the northern bat (<i>Myotis septentrionalis</i>). No buildings were dismantled during the period covered by this report.	
5.4.2	if maternity sites or rest areas for little brown myotis (Myotis lucifugus) or Northern myotis (Myotis septentrionalis) are identified in accordance with condition 5.4.1, establish a setback buffer zone with a 100-metre radius around each maternity site or rest area and maintain the zone for the duration of the breeding period; and	Not applicable
	Follow-up on condition	
	No maternity or resting sites for the little brown bat (<i>Myotis lucifugus</i>) or the northern bat (<i>Myotis septentrionalis</i>) have been identified on the project site.	
5.4.3	for any maternity site or rest area for little brown myotis (Myotis lucifugus) or Northern myotis (Myotis septentrionalis) located on a building that must be dismantled as part of the Designated Project, dismantle the building outside the chiropteran breeding period and install, prior to dismantling the building, a shelter to offset the loss of the maternity site or the rest area. The Proponent shall maintain the shelter during all phases of the Designated Project.	Not applicable
	Follow-up on condition	
	No maternity or resting sites for the little brown bat (<i>Myotis lucifugus</i>) or the northern bat (<i>Myotis septentrionalis</i>) have been identified on the project site.	
5.5	The Proponent shall develop, prior to construction and in consultation with the Cree Nation Government, the Cree Nation of Eastmain and the tallyman of trapline RE02, a protocol to report the presence or signs of the presence of wolverine (Gulo gulo). The Proponent shall implement the protocol during all phases of the Designated Project.	
	Follow-up on condition	Ongoing
	GLCI has developed, in consultation with the Cree Nation Government, the Cree Nation of Eastmain and the RE02 tallyman, a protocol for reporting the presence or evidence of wolverine (<i>Gulo gulo</i>). This protocol was presented in the 2023 Annual Report and the document was sent to stakeholders in 2023.	



Condition #	Details and follow-up of conditions	Status of Implementation
	The protocol was implemented in 2024 as activities were carried out on site. Employees and contractors were trained in the protocol's broad outlines.	
	No presence or signs of wolverine were observed.	
5.6	The Proponent shall develop, prior to construction and in consultation with Environment and Climate Change Canada, the Cree Nation Government, the Cree Nation of Eastmain and the Cree of the First Nation of Waskaganish, and implement during all the phases of the Designated Project, a follow-up program in order to verify the accuracy of the environmental assessment and to determine the effectiveness of the mitigation measures to avoid causing adverse environmental effects on caribou (Rangifer tarandus). The follow-up program shall include the mitigation measures implemented to satisfy conditions 5.1 to 5.3. In doing so, the Proponent shall:	
	Follow-up on condition In consultation with Environment and Climate Change Canada, the Cree Nation Government, the Cree Nation of Eastmain and the Crees of the Waskaganish First Nation, GLCI has developed an environmental and social follow-up program. Section 11 of this program outlines monitoring procedures for verifying the accuracy of the environmental assessment and judging the effectiveness of mitigation measures with respect to adverse environmental effects on caribou (Rangifer tarandus).	Ongoing
	The follow-up program was sent to stakeholders for comment in 2023, and the comments received have been incorporated.	
	The follow-up program was finalized in 2024, prior to the start of construction, and submitted to the relevant authorities on March 18, 2024. This plan was implemented as soon as activities began at the project site. The results are presented in Appendix J.	
	monitor the use of the Designated Project area by predators of caribou (Rangifer tarandus);	
5.6.1	Follow-up on condition A wildlife observation log was developed. The information recorded in this register was considered in the caribou monitoring report. The use of the designated project area by caribou predators are presented in the monitoring report in Appendix J.	Ongoing
5.6.2	determine whether modified or additional mitigation measures are necessary based on the results of the monitoring conducted pursuant to condition 5.6.1.	
	Follow-up on condition	Ongoing
	No mitigation or additional measures are deemed necessary at this stage of the project, given the results of the follow-up.	



Condition #	Details and follow-up of conditions	Status of Implementation
	The Proponent shall develop, prior to construction and in consultation with the Cree Nation Government, First Nations and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and to determine the effectiveness of the mitigation measures to avoid deleterious effects on little brown myotis (Myotis lucifugus) and Northern myotis (Myotis septentrionalis). The Proponent shall implement the follow-up program during construction and up to five years after closure. As part of the implementation of the follow-up program, the Proponent, through a qualified individual, shall:	
	Follow-up on condition	
5.7	GLCI has developed an environmental and social follow-up program in consultation with the Cree Nation Government, First Nations and competent authorities. Section 10 of this program outlines monitoring procedures for verifying the accuracy of the environmental assessment and assessing the effectiveness of mitigation measures with respect to adverse environmental effects on the little brown bat (<i>Myotis lucifugus</i>) and the northern bat (<i>Myotis septentrionalis</i>).	Ongoing
	The follow-up program was sent to stakeholders for comments in 2023, and comments received have been incorporated.	
	The follow-up program was finalized in 2024, prior to the start of construction, and submitted to the relevant authorities on March 18, 2024. This program was implemented as soon as activities began at the project site. The results are presented in Appendix I.	
	conduct inventories of little brown myotis (Myotis lucifugus) and Northern myotis (Myotis septentrionalis) starting in the first year of operation and up to the fifth year after closure of the mine, at a frequency of one inventory every five years;	
5.7.1	Follow-up on condition	Not applicable
	Inventories of the little brown bat (<i>Myotis lucifugus</i>) and the northern bat (<i>Myotis septentrionalis</i>) will be carried out from the first year of operation until the fifth year following mine closure, at a frequency of one inventory every five years.	
5.7.2	monitor the use of any maternity site or rest area identified pursuant to condition 5.4.1 during any deforestation or building dismantling activities during construction;	
	Follow-up on condition	Ongoing
	Tree clearing activities at the site took place between March 20 and April 11, before the breeding and fall migration periods of the little brown bat (<i>Myotis lucifugus</i>) or the northern bat (<i>Myotis septentrionalis</i>). No buildings were dismantled during the period covered by this report.	
5.7.3	monitor annually, during construction and operation, the use and integrity of any shelter installed pursuant to condition 5.4.3; and	Not applicable



Condition #	Details and follow-up of conditions	Status of Implementation
	Follow-up on condition	
	There was no need to install any shelter in accordance with condition 5.4.3. Monitoring was therefore not necessary.	
	perform a characterization of the potential habitat of little brown myotis (Myotis lucifugus) and Northern myotis (Myotis septentrionalis) at the sites where monitoring is performed in accordance with condition 5.7.2 and 5.7.3.	
5.7.4	Follow-up on condition	Ongoing
	The potential habitat of the little brown bat (<i>Myotis lucifugus</i>) and the northern bat (<i>Myotis septentrionalis</i>) was characterized as part of the monitoring program. The results are presented in Appendix I.	

2.6. WETLANDS

Condition #	Details and Follow-Up of Conditions	Status of Implementation
	Wetlands	
	The Proponent shall carry out the Designated Project in a manner that avoids adverse environmental effects of the Designated Project on wetlands and wetland functions. The Proponent shall favour, to avoid adverse effects, the maintenance of wetlands and wetland functions over the reduction of adverse effects on wetlands and wetland functions. Where the loss of wetlands and wetland functions cannot be avoided, the Proponent shall favour the mitigation of adverse effects on wetlands and their functions rather than offsetting the wetlands and their functions that are affected.	
	Follow-up on condition	
6.1	The project was initially designed with the aim of optimizing the footprint of the infrastructure, to avoid affecting wetlands as much as possible.	Ongoing
	In particular, the following mitigation measures have been implemented to minimize impacts on wetlands:	
	 Maintain a riparian buffer zone of 10 to 15 m, depending on the slope of the embankment, around wetlands, watercourses and water bodies; and 	
	 Marking the boundaries of the planned earthworks, limiting tree cutting, soil stripping and minimizing clear-cutting to the footprint required for the necessary infrastructure. 	
6.2 6.2.1 6.2.2 6.2.3	The Proponent shall develop, prior to construction and in consultation with the Cree Nation of Eastmain, the Cree Nation Government, Environment and Climate Change Canada and other relevant authorities, and implement a wetlands offsetting plan taking into account Environment and Climate Change Canada's Operational Framework for Use of Conservation Allowances for adverse environmental effects of the Designated Project on wetlands and wetland functions that cannot be avoided or mitigated pursuant to condition 6.1. The Proponent shall begin implementation of the	Ongoing



Condition #	Details and Follow-Up of Conditions	Status of Implementation
	Wetlands	
	wetlands offsetting plan in the first year following the start of construction. The offsetting plan shall include:	
	 a description of the wetland functions that will be offset and an assessment of the losses of wetlands and wetland functions after offsetting; a description and a justification of the key performance indicators used by the Proponent to assess the effectiveness of offsetting; and a timeline for implementation of the offsetting plan. 	
	Follow-up on condition	
	GLCI has developed, in consultation with the Cree Nation of Eastmain, the Cree Nation Government (CNG), Environment and Climate Change Canada and the relevant authorities, a wetland compensation plan describing the wetlands and their affected surface areas, ecological functions, compensatory measures and compensation projects. This plan takes into account Environment and Climate Change Canada's Operational Framework for Use of Conservation Allowances for the adverse environmental effects of the Galaxy mine on wetlands and their functions that cannot be avoided or mitigated in accordance with condition 6.1. The compensation plan details the consultation efforts that were carried out with the Cree Nation of Eastmain during the development of the wetland compensation plan. The final document was submitted to the CNG and ECCC on January 3, 2024. Comments from ECCC were received on April 2, 2024.	
	The implementation of the plan began in the fall of 2024 with characterization work on the sites selected for wetland compensation (Appendix K1). The characterization work was carried out by WSP's team, accompanied by the RE02 tallyman, Brian Weapenicappo.	
	A meeting was also held on November 5, 2024, with Mr. Éric Rosa of the Université de Québec in Abitibi-Témiscamingue and Mr. Dylan Mayappo, representative of the Cree Nation of Eastmain. The purpose of the meeting was to present the project to acquire knowledge of the aquifers in the Eastmain region, as part of the wetland compensation plan, and to validate the project's relevance with Mr. Rosa's current research. The minutes of the meeting are presented in Appendix K2.	
	The Proponent shall maintain the drainage profiles of any wetland located within 100 metres of any work area in the Designated Project area.	
6.3	Follow-up on condition Machinery traffic remained confined to the work areas. The drainage profile remained unchanged around the periphery of the work areas.	Ongoing
6.4 6.4.1	The Proponent shall implement, during all the phases of the Designated Project, measures to avoid the introduction or propagation of invasive alien plant species in the Designated Project area. In doing so, the Proponent shall:	Completed



Condition #	Details and Follow-Up of Conditions	Status of Implementation
	Wetlands	
	delineate, before construction, the areas containing invasive alien plant species in the Designated Project area;	
	Follow-up on condition	
	This condition was completed in 2023; information on compliance with this condition is presented in the 2023 Annual Report.	
	 clean any vehicle and any machinery before it enters the Designated Project area; and clean any vehicle and any machinery that has circulated in any area containing invasive alien plant species, delineated pursuant to condition 6.4.1, before it leaves this area. 	
	Follow-up on condition	
6.4.2 6.4.3	The vehicles and machinery belonging to Arcadium Lithium were new when they entered the project site. No cleaning was therefore necessary. As for the vehicles and machinery belonging to the contractors, their number was kept to a minimum due to the low level of activity on site. Once the contractor's machinery was returned to the site, it remained there until the contractor's activities were completed. In the documents sent to the contractors (Environment Program), this clause is included, but we have no written proof that they cleaned the vehicles and machinery before they arrived at the site.	Ongoing
	As no invasive alien plant species have been observed on the site, condition 6.4.3 is not applicable for the period covered by this report.	
6.5	The Proponent shall develop, prior to construction and in consultation with First Nations, the Cree Nation Government, Environment and Climate Change Canada and other relevant authorities, and implement during all phases of the Designated Project, a follow-up program to verify the accuracy of the environmental assessment regarding the adverse environmental effects of the Designated Project on wetland functions, including the adverse environmental effects caused by invasive alien plant species, and the effectiveness of the mitigation measures regarding wetlands. As part of the implementation of the follow-up program, the Proponent shall:	
	Follow-up on condition	Ongoing
	GLCI has developed an environmental and social follow-up program in consultation with the First Nations, the Cree Nation Government, Environment and Climate Change Canada and the relevant authorities. Sections 7 and 8 this program outline monitoring procedures for verifying the accuracy of the environmental assessment and judging the effectiveness of mitigation measures with respect to adverse environmental effects on wetland functions, including adverse environmental effects caused by invasive alien plant species, as well as the effectiveness of wetland-related mitigation measures.	



Condition #	Details and Follow-Up of Conditions	Status of Implementation
	Wetlands	
	The follow-up program was sent to stakeholders for comments in 2023, and comments received have been incorporated.	
	It was finalized in 2024, prior to the start of construction, and submitted to the relevant authorities on March 18, 2024. This program was implemented as soon as activities began at the project site. Wetland monitoring results are presented in Appendix L, while invasive alien species monitoring results are presented in Appendix M.	
	monitor the presence of invasive alien plant species in the Designated Project area at a minimum annual monitoring frequency;	
6.5.1	Follow-up on condition	Ongoing
	The presence of invasive alien plant species is monitored annually. The results are presented in Appendix M.	
	monitor the integrity of the residual wetlands and their functions during all the phases of the Designated Project;	
6.5.2	Follow-up on condition	Ongoing
	The integrity of residual wetlands and their functions are monitored. The results are presented in Appendix L.	
	monitor the effectiveness of the offsetting plan referred to in condition 6.2, including the establishment and integrity of any wetland created as part of the offsetting, for at least five years after its creation, and determine, in consultation with the parties consulted for the preparation of the follow-up program, if additional monitoring is required; and	
6.5.3	Follow-up on condition	Not applicable
	Considering that the creation of new wetlands as part of the compensation plan has still not been implemented, the actions to be implemented to satisfy this condition are not applicable for the period covered by this report.	
6.5.4	determine if modified or additional mitigation measures are necessary according to the results of the monitoring conducted in accordance with conditions 6.5.1, 6.5.2 and 6.5.3.	
	Follow-up on condition	Not applicable
	No modified or additional mitigation measures are deemed necessary at this stage of the project.	



2.7. CREE HEALTH

Condition #	Details and Follow-Up of Conditions	Status of Implementation
	Cree Health	
	The Proponent shall develop, prior to construction and in consultation with First Nations, the Cree Nation Government, the tallyman of trapline RE02, the managers of the kilometre 381 roadstop and relevant authorities, a dust management plan that includes measures to mitigate dust emissions generated by the Designated Project and to prevent the exceedance of the ambient air quality criteria set out in the National Ambient Air Quality Objectives for Particulate Matter and the World Health Organization's recommendations for particulate matter (PM10). The Proponent shall submit the plan to the Cree Board of Health and Social Services of James Bay and relevant authorities three months before the start of construction. The Proponent shall implement the plan at the start of construction and during all phases of the Designated Project. The Proponent shall take into account current weather conditions that are conducive to dust emissions (including drought or sustained wind conditions) when implementing the measures in the plan. Among these measures, the Proponent shall:	
7.1	Follow-up on condition	Ongoing
	GLCI has developed, in consultation with the First Nations, the Cree Nation Government, the RE02 tallyman, those responsible for the km 381 truck stop and the relevant authorities, an environmental and social follow-up program, as well as a dust management plan presented as an appendix to the follow-up program.	
	The follow-up program and dust management plan were sent to stakeholders for comments in 2023, and comments received have been incorporated.	
	The follow-up program and dust management plan were finalized in 2024, before construction began, and submitted to the relevant authorities on March 18, 2024.	
	Implementation of the dust management plan began in 2024, given the activities carried out at the site.	



Condition #	Details and Follow-Up of Conditions	Status of Implementation
	Cree Health	
7.1.1 7.1.2 7.1.3 7.1.4 7.1.5 7.1.6	 use dust suppressants for non-asphalted roads and other similar surfaces that preserve environmental health; regularly clean and/or wet the roads and the work site areas, in order to reduce fugitive dust emissions likely to come from these surfaces; use non-friable, non-clay materials with good road abrasion resistance for road surface construction and maintenance; maintain roads on a regular basis to maintain a good rolling surface and low silt; enclose the external conveyors in the industrial area, as identified on Figure 5 of the Environmental Assessment Report prepared by the Impact Assessment Agency of Canada (Canadian Impact Assessment Registry, reference number 80141), in sealed structures; and mitigate the dispersion of dry and fine materials generated by drilling activities, including during blasting. 	Ongoing
	Follow-up on condition The following measures have been implemented to minimize dust at the site: - Regular cleaning and watering of the access road and site area; and - The use of non-friable, non-clayey materials with good resistance to road abrasion for the access road.	
7.2	The Proponent shall identify, prior to undertaking blasting activities and in consultation with relevant authorities, the conditions during which detonations are likely to generate high gas emissions, including nitrogen dioxide. In doing so, the Proponent shall: Follow-up on condition	Completed
	This condition was completed in 2023; information on compliance with this condition is presented in the 2023 Annual Report.	
7.2.1	take into account weather conditions and the characteristics of the explosive used when identifying these conditions, and implement, in consultation with relevant authorities, additional mitigation measures when carrying out blasting activities under these conditions; and	
	Follow-up on condition Weather conditions and the characteristics of the explosive to be used were considered when identifying the conditions under which detonations are likely to generate high gas emissions. However, since there has been no blasting activity at the site during the period covered by this report, this condition is considered not applicable for the time being.	Not applicable



Condition #	Details and Follow-Up of Conditions	Status of Implementation
	Cree Health	
	present to the Agency and the Cree Nation Government, before the start of blasting activities, a description of the conditions referred to in condition 7.2 and the measures referred to in condition 7.2.1 to be implemented if carrying out blasting activities under these conditions.	
7.2.2	Follow-up on condition The technical note on the environmental constraints generated by blasting fumes was sent to the CNG on September 21, 2023. It was also sent to the IAAC on January 3, 2024.	Completed
7.3	The Proponent shall prohibit blasting, not handle any granular material and implement measures to avoid raising dust in the stockpiles during operation when there are strong wind conditions as defined in Environment and Climate Change Canada's Weather and meteorology glossary in the direction of sensitive receptors. The proponent shall identify the sensitive receptors prior to construction, including the kilometre 381 roadstop and traditional activity sites to the east and southeast of the Designated Project Area. The proponent shall keep the list of sensitive receptors up to date during all phases of the Designated Project.	Ongoing
	Follow-up on condition No blasting was carried out in 2024. Sensitive receptors were presented in the 2023 Annual Report, and an update was not necessary in 2024.	
	The Proponent shall install dust control systems for the drill rigs. The Proponent shall maintain the dust control systems in good working order.	
7.4	Follow-up on condition Considering that drilling activities have not yet begun, the actions to be implemented to satisfy this condition are not applicable for the period covered by this report.	Not applicable
7.5	The Proponent shall use electric vehicles for the transport of employees during all phases of the Designated Project unless not technically or economically feasible, and shall prioritize the use of electric equipment during operation, or equipment that meets the United States Environmental Protection Agency (USEPA) Tier 4 emission standards if electric equipment is unavailable or its use is not technically or economically feasible. If the Proponent determines that equipment meeting Tier 4 emission standards is unavailable or its use is not technically or economically feasible, the Proponent shall submit a justification to the Agency and the Cree Nation Government for this determination before using the equipment.	Ongoing



Condition #	Details and Follow-Up of Conditions	Status of Implementation
	Cree Health	
	Follow-up on condition	
	In 2024, it was not possible to use electric vehicles for employee transport. Indeed, given the very low level of activity at the site this year and the small number of employees and where they come from, the use of electric vehicles was not technically or economically feasible. Nevertheless, employees and contractors used vehicles that complied with US Environmental Protection Agency (USEPA) Group 4 emission standards.	
7.6	The Proponent shall establish speed limits on all roadways located in the Designated Project area taking into account the recommended speed limits in the document Best Practices for the Reduction of Air Emissions From Construction and Demolition Activities prepared for Environment and Climate Change Canada by Cheminfo Services Inc. and by requiring and ensuring that any person obeys these speed limits during all the phases of the Designated Project (including by installing signs indicating the speed limits).	Ongoing
	Follow-up on condition	
	GLCI has developed up a traffic plan (Appendix N). Speed limits are well defined in this plan. Signs displaying speed limits on the site have been installed, and monitoring has been carried out to ensure compliance with the plan. The plan was finalized in 2024, prior to construction of the project.	
7.7	The Proponent shall maintain all vehicles and equipment operated by the Proponent as part of the Designated Project in accordance with the manufacturer's maintenance guidelines to keep them in good working order and ensure that emission and noise control technologies are not removed from the vehicles and equipment, unless their removal is required for repair and maintenance activities, in which case the technologies shall be reinstalled or replaced before the vehicle or equipment is returned to service.	Ongoing
	Follow-up on condition	
	The equipment is new and comes with the original muffler for the year of purchase (2022-2023).	
7.8	The Proponent shall favour chipping and spreading of ligneous waste and debris in the Designated Project area or any other use of ligneous debris that allows its reclamation, reuse or recycling, unless not possible for safety reasons.	Completed
	Follow-up on condition	Completed
	During tree clearing, woody debris was chipped and spread in the project area.	



Condition #	Details and Follow-Up of Conditions	Status of Implementation
	Cree Health	
7.9	The Proponent shall construct, during operation, a noise barrier using waste rock on the south perimeter of the east stockpile between the mobile equipment circulating at the top of the stockpile and the kilometre 381 roadstop. The Proponent shall maintain the height of the noise barrier depending on the elevation of the pile.	Not applicable
	Follow-up on condition As the mine is not yet in operation,, the actions required to meet this condition are not applicable for the period covered by this report.	
	The Proponent shall prepare, prior to construction and in consultation with	
	First Nations, a protocol for managing complaints pertaining to exposure to noise generated by the Designated Project, the shared use of land and resources by First Nations and the employees and contractors associated with the Designated Project, and the quality of the resources used for traditional purposes. The Proponent shall respond to any complaint received within 48 hours after receipt of the complaint and deploy corrective measures in a timely manner. The Proponent shall develop the corrective measures in consultation with First Nations and the Cree Nation Government and implement the protocol during all the phases of the Designated Project. The Proponent shall present to First Nations the results of the implementation of the protocol for complaints pertaining to exposure to noise and the corrective measures implemented in response to these complaints.	
	Follow-up on condition	
7.10	In 2023, in consultation with First Nations, GLCI developed a complaint management protocol for the Galaxy project (Appendix O). This protocol applies, among other things, to exposure to noise generated by the project, to the shared use of land and resources by First Nations and by employees and contractors associated with the designated project, and to the quality of resources used for traditional purposes. GLCI has committed to respond to any complaints received within 48 hours, and to implement corrective measures, which will be developed in consultation with the First Nations and the Cree Nation Government, in a timely manner.	Ongoing
	This protocol was revised in March 2024 and sent to First Nations for information.	
	This protocol is implemented and maintained throughout all phases of the project, and the results of its implementation will be presented to First Nations.	
	No complaints related to exposure to noise generated by the project, to the shared use of land and resources by First Nations or by employees and contractors associated with the designated project, or to the quality of resources used for traditional purposes were received in 2024.	



Condition #	Details and Follow-Up of Conditions	Status of Implementation
	Cree Health	
	The Proponent shall equip motorized equipment with mufflers, except if this is not technically or economically feasible, and maintain the mufflers in good working order.	
7.11	Follow-up on condition	Ongoing
	The equipment is new, and all fitted with the original muffler for the year of purchase (2022-2023). A daily vehicle inspection form has been developed and distributed to all vehicles.	
	The Proponent shall develop, prior to construction, and implement, during all phases of the Designated Project, a policy prohibiting the operation of engine brakes for all vehicles in the Designated Project area. The Proponent shall require and ensure that any person complies with this policy, unless there are technical constraints or constraints pertaining to health or safety. The Proponent shall ensure that the policy includes raising awareness about the use of engine brakes outside of the mine site, in areas where Cree camps are located and in areas where traditional activities are practiced more intensely.	Ongoing
7.12	Follow-up on condition	
	A local policy to reduce the fuel consumption of equipment and vehicles and a procedure for the use of machinery have been developed, prohibiting the use of engine brakes (Appendices P1 and P2). In addition, eco-driving training is mandatory for all workers on site. This training includes raising awareness of the use of engine brakes outside the mine site.	
	GLCI has ensured that this good practice is respected through regular site inspections, unless there are any special constraints.	
7.13	The Proponent shall develop, prior to construction and in consultation with Environment and Climate Change Canada, Health Canada, the Cree Nation of Eastmain, the Cree Nation Government, the tallyman of trapline RE02, land users, the Cree Board of Health and Social Services of James Bay, and other relevant authorities, a follow-up program in order to verify the accuracy of the environmental assessment and to determine the effectiveness of the mitigation measures pertaining to the adverse environmental effects on human health caused by the changes to air quality resulting from the Designated Project. The Proponent shall implement the follow-up program before the start of construction and up to the end of operation. As part of the implementation of the follow-up program, the Proponent shall:	Ongoing
	Follow-up on condition	
	GLCI has developed an environmental and social follow-up program in consultation with Environment and Climate Change Canada, Health Canada, the Cree Nation of Eastmain, the Cree Nation Government, the RE02 tallyman, land users, the Cree Board of Health and Social Services of James Bay and the relevant authorities. Section 2 of this program describes the measures to be taken to verify the accuracy of the	



Condition #	Details and Follow-Up of Conditions	Status of Implementation
	Cree Health	
	environmental assessment and to judge the effectiveness of mitigation measures regarding the adverse environmental effects on human health caused by changes in air quality resulting from the project.	
	The follow-up program was sent to stakeholders for comments in 2023, and comments received were incorporated. The follow-up program was finalized in 2024, prior to project construction.	
	Implementation of this program began in 2023, prior to construction. The report for 2024 is presented in Appendix Q.	
7.13.1	determine, in consultation with relevant authorities and taking into account the guidance on air zone management and the levels of management for the Canadian Ambient Air Quality Standards from the Canadian Council of Ministers of the Environment, the thresholds above which modified or additional mitigation measures are necessary;	Completed
	Follow-up on condition	
	This condition was completed in 2023; information on compliance with this condition is presented in the 2023 Annual Report.	
	monitor the rates of total particulate matter (TPM), fine particulate matter (PM2.5), particulate matter (PM10), metals (particularly arsenic) and crystalline silica at no less than one location in the Designated Project area and one location determined in consultation with the parties consulted during the development of the follow-up program;	
	Follow-up on condition	
7.13.2	An air quality monitoring station has been installed at the truck stop at km 381 of Billy-Diamond Highway in July 2022.	Ongoing
	A second sampling station was installed in 2024, prior to project construction. Since electricity was not available on site, this station was powered by a generator and positioned for easy access. For the part of the year covering site preparation work, the station was powered by construction generators, several power outages occurred, and some analysis could not be completed. This station will be relocated in due course.	
	Monitoring results for the year 2024 are presented in Appendix Q.	
7.13.3	monitor the nitrogen dioxide emissions during blasting activities and during the use of other nitrogen dioxide sources, particularly in the event that equipment compliant with the Tier 4 emission standards is unavailable or its use is not technically or economically feasible, as determined pursuant to condition 7.5; and	Ongoing



Condition #	Details and Follow-Up of Conditions	Status of Implementation
	Cree Health	
	Follow-up on condition	
	Although blasting activities had not yet begun at the site, and the equipment used complied with Group 4 emission standards, nitrogen dioxide emissions were monitored for air quality. The results are presented in Appendix Q.	
	develop and implement modified or additional mitigation measures if the results of the monitoring referred to in conditions 7.13.2 and 7.13.3 shows an exceedance of the thresholds established in condition 7.13.1.	
7.13.4	Follow-up on condition	Not applicable
	No modified or additional mitigation measures are deemed necessary at this stage of the project.	
	The Proponent shall develop, prior to construction and in consultation with Health Canada, the Cree Nation Government, First Nations, the manager of the kilometre 381 roadstop and other relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and to determine the effectiveness of mitigation measures pertaining to the adverse environmental effects on human health caused by noise attributable to the Designated Project. The Proponent shall implement the follow-up program during all the phases of the Designated Project. In doing so, the Proponent shall take into account Health Canada's Guidance for Evaluating Human Health Impacts in Environmental Assessment: Noise. As part of the implementation of the follow-up program, the Proponent shall:	
	Follow-up on condition	
7.14	GLCI has developed an environmental and social follow-up program in consultation with Health Canada, the Cree Nation Government, First Nations, the person responsible for the truck stop at kilometer 381 and the relevant authorities. Section 3 of this program, developed in consideration of Health Canada's "Guidance for Human Health Impact Assessment in Environmental Assessments: Noise", describes the steps to be taken to verify the adequacy of the environmental assessment and to judge the effectiveness of mitigation measures with respect to adverse environmental effects on human health caused by noise attributable to the project.	Ongoing
	The follow-up program was sent to stakeholders for comments in 2023, and comments received were incorporated. The follow-up program was finalized in 2024, prior to project construction.	
	Implementation of this program began in 2024. The results are presented in Appendix R.	
7.14.1	conduct monitoring at the kilometre 381 roadstop for noise levels attributable to the project during construction and operation;	Ongoing



Condition #	Details and Follow-Up of Conditions	Status of Implementation
	Cree Health	
	Follow-up on condition Noise levels at truck stop 381 were monitored during site activities. The results are presented in Appendix R.	
	compare the noise levels attributable to the Designated Project with the relevant health indicators, particularly percent highly annoyed (%HA) and long-term sleep disturbance; and	
7.14.2	Follow-up on condition Noise levels attributable to the project were compared with relevant health indicators. The results are presented in Appendix R.	Ongoing
	develop and implement modified or additional mitigation measures if the results of the monitoring referred to in condition 7.14.1 show an exceedance of the thresholds established in condition 7.14.2.	
7.14.3	Follow-up on condition No modified or additional mitigation measures are deemed necessary at this stage of the project.	Not applicable
	The Proponent shall prepare, prior to construction and in consultation with Health Canada, the Cree Nation Government, First Nations, the Société de développement de la Baie-James and other relevant authorities, and implement a follow-up program to verify the accuracy of the environmental assessment as it pertains to the water quality of the drinking water supply well at the kilometre 381 roadstop. If the Société de développement de la Baie-James informs the proponent of water contamination in the drinking water supply well attributable to the designated project, the proponent shall implement mitigation measures to correct the quality of the drinking water in the well and shall supply drinking water to the kilometre 381 roadstop until the quality of the water in the drinking water supply well meets the standards applied by the Société de développement de la Baie-James.	
7.15	Follow-up on condition GLCI has developed an environmental and social follow-up program in consultation with Health Canada, the Cree Nation Government, First Nations, the Société de développement de la Baie-James (SDBJ) and the relevant authorities. The groundwater quality follow-up, presented in Section 4, discusses the monitoring to be conducted to verify the accuracy of the environmental assessment with respect to the water quality of the drinking water supply well at the Kilometer 381 truck stop. The follow-up program was sent to stakeholders for comments in 2023, and comments received were incorporated. The follow-up program was	Ongoing
	finalized in 2024, prior to project construction. The results of this monitoring are presented in Appendix C.	



Condition #	Details and Follow-Up of Conditions	Status of Implementation
	Cree Health	
	No mitigation measures were deemed necessary to correct the quality of the drinking water in the well, and there was no need to supply drinking water to the truck stop at kilometer 381.	
	The Proponent shall develop, prior to construction, to the satisfaction of Health Canada and the Cree Board of Health and Social Services of James Bay, and in consultation with the Cree Nation Government, First Nations, the tallyman of trapline RE02 and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and determine the effectiveness of the mitigation measures pertaining to the adverse environmental effects of the Designated Project on the health of Indigenous peoples resulting from the changes to the concentration of contaminants of potential concern in plants and game animal tissues likely to be consumed by the Cree as traditional foods. As part of the development of the follow-up program, the Proponent shall determine the plants, game animal tissues and their components that will be monitored, the locations where the monitoring will be conducted, the contaminants to monitor, and the timing and frequency of the monitoring activities. The Proponent shall ensure that the follow-up program respects traditional Cree customs and practices. The Proponent shall implement the follow-up program from construction to decommissioning and in collaboration with the Cree Nation of Eastmain. In doing so, the Proponent shall:	
	Follow-up on condition	
7.16	GLCI has developed an environmental and social follow-up program in consultation with the Cree Nation Government, the First Nations, the RE02 tallyman and the relevant authorities. Section 12 of this program was developed to verify the accuracy of the environmental assessment and determine the effectiveness of mitigation measures with respect to the project's adverse environmental effects on the health of Indigenous peoples resulting from changes in the concentration of contaminants of potential concern in plants and game tissues likely to be consumed by the Crees as traditional foods.	Ongoing
	The follow-up program was sent to stakeholders for comments in 2023, and the comments received have been incorporated, except for a third set of comments received from Health Canada on November 22, 2024, which are to be incorporated into the follow-up program. It is still planned to finalize the follow-up program in 2025, prior to the construction phase.	
	Given the activities at the site, implementation of this program began in 2024. Potential contamination in plants was monitored. The results are presented in Appendix S.	
	Potential contamination in beaver flesh was also supposed to be monitored. However, prior to capturing the beavers, an inventory of the beaver population was conducted in the study area's waterways with the help of the RE02 tallyman Brian Weapenicappo. Following this inventory, it was agreed with Mr. Weapenicappo that the beaver population was too small to capture the desired number of beavers to monitor potential	



Condition #	Details and Follow-Up of Conditions	Status of Implementation
	Cree Health	
	contamination in the flesh of this species. Inventory results are presented in Appendix T.	
	Finally, at the request of Health Canada, monitoring of potential contamination of fish flesh was added to the monitoring program. Fishing was therefore carried out in 2024, and flesh samples were taken for analysis. The results of this monitoring are presented in Appendix U.	
7.16.1	conduct, prior to construction and during a harvesting period planned by the First Nations in the area of influence of the project, or during a harvesting period planned by the First Nations in the first year following the start of construction at a reference site outside the area of influence of the Designated Project that has similar environmental conditions to the area of influence of the Designated Project, a survey of the levels of contaminants of potential concern in plants;	Completed
	Follow-up on condition	
	This condition was completed in 2023; information on compliance with this condition is presented in the 2023 Annual Report.	
	monitor, during all phases of the Designated Project, the contaminants of potential concern in plants in the area of influence of the Designated Project at a sampling frequency of at least once a year;	
7.16.2	Follow-up on condition	Ongoing
	Potential contamination in plants was monitored in 2024. The results are presented in Appendix S.	
	carry out, prior to construction, a survey of the levels of contaminants of potential concern in game animal tissues;	
7.16.3	Follow-up on condition	Completed
	This condition was completed in 2023; information on compliance with this condition is presented in the 2023 Annual Report.	
7.16.4	monitor the levels of contaminants of potential concern in game animal tissues at minimum every five years from the start of construction; and	
	Follow-up on condition	
	As mentioned in condition 7.16, as part of the monitoring of levels of contaminants of potential concern in game tissues, an inventory of signs of beaver presence was conducted in the study area's watercourses. Tallyman Brian Weapenicappo participated in this fieldwork. Following the inventory, it was agreed with Mr. Weapenicappo that the beaver population was too small to capture the desired number of beavers to monitor potential contamination in the tissues of this species. Inventory results are presented in Appendix T.	Ongoing
	potential contamination in the tissues of this species. Inventory results are presented in Appendix T.	



Condition #	Details and Follow-Up of Conditions	Status of Implementation
#	Cree Health	implementation
	An inventory of signs of beaver presence in the study area's waterways is also planned for 2025. If the beaver population is considered large enough, levels of contaminants of potential concern in beaver tissue will be monitored.	
7.16.5	if the sampling and monitoring results described in conditions 7.16.2 and 7.16.4 exceed the predictions of the environmental assessment, implement any modified or additional mitigation measure in accordance with condition 2.5 according to the results of the follow-up program, and update the assessment of the human health risks established by the Proponent in the assessment of the toxicological risks for human health in Appendix CEAA-44 of the complement to the Environmental Impact Statement (Canadian Impact Assessment Registry, reference number 80141, document number 28), using the sampling and monitoring results. The Proponent shall integrate the current and projected consumption habits of First Nations identified during the environmental assessment in the updated human health risk assessment and any new information on consumption habits provided by the First Nations under the follow-up program.	Not applicable
	Follow-up on condition No modified or additional mitigation measures are deemed necessary at this stage of the project. Updating of the human health toxicological risk assessment is currently scheduled for the first year following the start of construction.	
7.171 7.17.1	The proponent develops measures to reduce air emissions, integrates them into the design of the designated project and implements them during all phases of the designated project, in order to avoid or reduce the negative environmental effects caused by these emissions on the health of the Crees. In doing so, the proponent provides eco-driving training to truckers transporting materials, including ensuring that truckers are trained in efficient acceleration and deceleration;	
	Follow-up on condition GLCI has developed a greenhouse gas management plan, which was presented in the 2023 Annual Report. This plan includes several measures aimed at reducing greenhouse gases and atmospheric emissions. These measures include, among others, the development of training material on eco-driving, as well as tracking sheets for fuel and electricity consumption associated with the project's activities. Implementation of this management plan began in 2024 with the start of activities at the site. Eco-driving training was offered to truckers transporting materials to the site.	Ongoing

 $^{^{1}}$ Conditions 7.17; 7.17.1, 7.17.2, 7.17.3, 7.17.4, 7.17.5 replace the conditions of section 9 in the amended Decision Statement dated July 26, 2024.



Condition #	Details and Follow-Up of Conditions	Status of Implementation
	Cree Health	
	develops, prior to construction and in consultation with the relevant authorities, a policy aimed at reducing fuel consumption. The developer applies the policy throughout all phases of the designated project;	Ongoing
7.17.2	Follow-up on condition	
	In consultation with the relevant authorities, GLCI has developed a policy to reduce the fuel consumption of equipment and vehicles associated with the Galaxy project. This policy was presented in the 2023 Annual Report.	
	This policy has been applied from the beginning of activities at the site.	
	monitors fuel consumption associated with the designated project during all phases of the designated project, and submits the results of this monitoring annually to Environment and Climate Change Canada and to the "Ministère de l'Environnement, de la Lutte contre les changements climatiques, de la Faune et des Parcs";	Ongoing
7.17.3	Follow-up on condition	
	Fuel consumption associated with the project has been recorded and is being monitored. Results for the year 2024 will be presented to Environment and Climate Change Canada, as well as to the "Ministère de l'Environnement, de la Lutte contre les changements climatiques, de la Faune et des Parcs" in Q2 2025.	
	prohibits idling of all equipment and vehicles within the designated project area. The proponent requires and ensures that all comply with this policy, unless there are technical constraints related to the operation of equipment and vehicles and health or safety constraints;	Ongoing
7.17.4	Follow-up on condition	
	Idling of all equipment and vehicles in the project area is prohibited, unless there are technical or health and safety constraints. This information is mentioned during training sessions and in the machinery procedure.	
7.17.5	develops the designated project area and optimizes activities related to the implementation of the designated project in order to minimize transport requirements and travel distances within the designated project area.	
	Follow-up on condition	Ongoing
	To date, the project area has been developed in such a way as to minimize the need for transport and the distances involved. The materials required for the various works are stored on site to reduce transport distances.	



2.8. CURRENT USE OF LANDS AND RESOURCES FOR TRADITIONAL PURPOSES

Condition #	Details and Follow-Up of Conditions	Status of Implementation
	Current Use of Lands and Resources for Traditional Purposes	
8.1 8.1.1 8.1.2 8.1.3 8.1.4 8.1.5 8.1.6 8.1.7	The Proponent shall develop, prior to construction and in consultation with First Nations, the Cree Nation Government, the Cree Board of Health and Social Services of James Bay, and relevant authorities, a communication plan for the purposes of sharing information with First Nations, the kilometre 381 roadstop staff, land users, employees and contractors associated with the Designated Project, and potentially affected parties on the Designated Project's activities, pertaining to the health of Indigenous peoples and the practice of Indigenous activities. The Proponent shall implement and maintain the communication plan during all the phases of the Designated Project. The plan shall include the procedures, including the schedule and the methods, pertaining to the sharing of information on the following: • a schedule of mine construction, operation and closure activities and any update to the schedule of these activities; that will be carried out by the Proponent, and any update to the schedule of blasting activities in the open-pit mine; • the dates and times of all scheduled blasting activities that will be carried out by the Proponent, and any update to the schedule of blasting activities in the open-pit mine; • the results of the follow-up programs referred to in conditions 3.17, 3.18, 3.19, 3.20, 3.21, 4.8, 5.6, 5.7, 6.5, 7.13, 7.14, 7.15, 7.16, 8.17 and 8.18, including the potential risks for health, in plain language, and the modified or additional mitigation measures prepared and implemented by the Proponent in accordance with condition 2.8.4 for each follow-up program. In doing so, the Proponent shall hold presentations and information sessions on the results of the follow-up programs with First Nations at least one per year; • the action plan referred to in condition 5.1; • the details of the protocol for receiving complaints pertaining to noise exposure attributable to the Designated Project referred to in condition 8.16.	Ongoing
	Follow-up on condition	
	In 2023, GLCI developed a communications plan for the Galaxy project in consultation with First Nations, the Cree Nation Government, the Cree Board of Health and Social Services of James Bay and the relevant authorities. This plan was revised in 2024 and is presented in Appendix V. It includes all communications related to the federal conditions concerned, its timing and frequency, key messages, target audience, means and tools of communication. It has been forwarded to the abovementioned stakeholders.	
	This communication plan is implemented and maintained throughout all phases of the project.	



Condition #	Details and Follow-Up of Conditions	Status of Implementation
	Current Use of Lands and Resources for Traditional Purposes	
	The Proponent shall offer the tallymen of traplines RE02, VC33 and VC35, and Eastmain environmental services, the possibility of participating in the environmental monitoring and follow-up activities.	
	Follow-up on condition	
8.2	When planning certain field work to be carried out in 2024 (beaver inventory and characterization work for wetland compensation projects), GLCI offered the tallyman of territory RE02, Mr. Brian Weapenicappo, the opportunity to participate. Considering that this work was carried out on territory RE02, the opportunity to participate in the work was offered only to the tallyman of territory RE02 and members of his family.	Ongoing
	GLCI is committed to maintaining communication with tallymen throughout the life of the project. During future environmental monitoring and follow-up activities, GLCI will continue to offer tallymen and Eastmain's environmental departments the opportunity to get involved if they wish.	
8.3 8.3.1 8.3.1.2 8.3.1.3 8.3.2 8.3.2.1 8.3.2.2	The Proponent shall prepare, in collaboration with the Cree Nation of Eastmain, a schedule of the annual hunting periods for the goose hunt and the moose hunt. The hunting periods will each last two weeks, meaning 14 days. The Proponent shall implement measures to mitigate the effects of the Designated Project on the goose and moose hunts, including: • for the duration of each hunting period, the Proponent shall: • reduce daily waste rock handling by at least 30%; • reduce the transportation of concentrate on the Billy-Diamond Highway from 12 to 8 return truck trips per day; and • perform truck transportation between 9:00 a.m. and 7:10 p.m; • following each hunting period, the Proponent shall: • hold a feedback session with the Cree Nation of Eastmain, the Cree Nation Government and the tallyman of trapline RE02 in order to determine if mitigation measures are sufficient; and • prepare and implement modified or additional mitigation measures, in consultation with the parties referred to in condition 8.3, if the feedback shows that the measures in place are insufficient. Follow-up on condition As the mine is not yet in operation, the actions required to meet this condition are not applicable for the period covered by this report.	Not applicable
8.4 8.4.1 8.4.2 8.4.3	The Proponent shall implement measures to mitigate the effects of blasting activities on the goose hunt. The Proponent shall implement these measures during the goose hunt period determined pursuant to condition 8.3 and for minimum one additional week, meaning a minimum	Not applicable



Condition #	Details and Follow-Up of Conditions	Status of Implementation
	Current Use of Lands and Resources for Traditional Purposes	
	of 21 days. In doing so, the Proponent shall:	
	 reduce the number of blasting operations to one blasting operation per 5 days, meaning a total of four blasting operations in 21 days; 	
	carry out blasting between 1:00 p.m. and 3:00 p.m.; and	
	 carry out blasting on weekdays, on days when the forecast weather conditions are unsuitable for goose hunting, except if this is not technically or economically feasible. 	
	Follow-up on condition	
	Considering that blasting activities have not yet begun, the actions to be implemented to meet this condition are not applicable for the period covered by this report.	
	The Proponent shall prohibit, during all the phases of the Designated Project, any person from fishing, hunting, trapping and to be in possession of firearms and hunting, trapping or fishing equipment in the Designated Project area and within the safety perimeter for any purposes not associated with the Designated Project or the implementation of the conditions included in this Decision Statement, except if this person is granted access by the Proponent for traditional purposes or for the exercise of Aboriginal rights, to the extent this access is safe.	Ongoing
8.5	Follow-up on condition	Oligonig
	All fishing, hunting and trapping activities are prohibited in the project area. It is also forbidden to possess firearms, hunting, trapping or fishing equipment in the project area. Employees and contractors are made aware of this through the Environment induction session, which is mandatory to access the project site. In addition, checklists are distributed in all contractors' site trailers.	
	The Proponent shall allow Cree workers to have access to traditional foods in the workplace.	
8.6	Follow-up on condition Considering that the employees are currently housed and fed at the km381 truck stop, which is managed by SDBJ, it is not possible to offer them this opportunity at this time.	Not applicable
8.7	The Proponent shall use antishrapnel mats when blasting occurs less than 500 metres from the kilometre 381 roadstop and the Billy-Diamond Highway.	Not applicable



Condition #	Details and Follow-Up of Conditions	Status of Implementation
	Current Use of Lands and Resources for Traditional Purposes	
	Follow-up on condition Considering that blasting activities have not yet begun, the actions to be implemented to meet this condition are not applicable for the period covered by this report.	
	The Proponent shall develop, prior to construction and in consultation with First Nations, a traffic management plan in order to mitigate the effects of the Designated Project on the practice of traditional activities and implement the plan during all the phases of the Designated Project. The plan shall include:	
	a protocol for the use of radio communications systems in the transport trucks associated with the Designated Project by the employees and contractors associated with the Designated Project;	
8.8	 monitoring of accidents involving vehicles associated with the Designated Project on the Billy-Diamond Highway; and 	
8.8.1 8.8.2 8.8.3	 the frequency of passage of heavy trucks and vehicles transporting workers on the different days of the week and at different times of day. 	Ongoing
	Follow-up on condition	
	As mentioned in condition 7.6, GLCI has developed, in consultation with First Nations, a transportation management plan for the project. Among other things, this plan aims to mitigate the project's effects on the practice of traditional activities. The management plan was finalized in 2024. The transportation management plan is in the process of being approved by provincial authorities, and a revised version will be sent to stakeholders as soon as it is available. Its implementation is planned from the construction phase.	
8.9 8.9.1 8.9.2 8.9.3 8.9.4	The Proponent shall offer an awareness training program to all employees and contractors associated with the Designated Project on the current use of lands and resources for traditional purposes by First Nations in order to promote a better understanding of different realities, deepen relations with First Nations and foster greater cohesion among workers. The Proponent shall develop the training in consultation with the Cree Nation Government. The training shall include:	
	 awareness of Cree culture, Cree language, values, and the practice of traditional activities by land users, particularly near the Billy-Diamond Highway; a companion system to establish and maintain respectful relationships between Indigenous and non-Indigenous workers; the road safety rules and speed limits on the Billy-Diamond Highway, and the requirement to obey them; and the steps to follow to ensure the safety of land users parking on the roadside to perform their harvesting. 	Ongoing



Condition #	Details and Follow-Up of Conditions	Status of Implementation
	Current Use of Lands and Resources for Traditional Purposes	
	Follow-up on condition	
	All employees and contractors associated with the project are made aware of the current use of lands and resources for traditional purposes by First Nations, with the aim of promoting a better understanding of different realities, deepening relations with First Nations and fostering greater cohesion among workers. A Cree Cultural Awareness Program was developed in 2023, in consultation with the Cree Nation Government. This program, revised in December 2024, is presented in Appendix W.	
	This program contains several actions, including those mentioned in conditions 8.9.1 to 8.9.4. They are implemented at different stages in the life of the project, as appropriate. Its implementation began in 2024 with the start of pre-construction work at the site, including the mandatory one-hour "Cultural Sensitivity" training offered online to all GLCI employees and all those working at the site. The mentoring system will be rolled out during the operational phase.	
	The Proponent shall delimit, in consultation with the tallyman of trapline RE02, an exclusion zone for traditional activities for safety reasons.	
8.10	Follow-up on condition	Completed
	This condition was completed in 2023; information on compliance with this condition is presented in the 2023 Annual Report.	
	The Proponent shall prepare, prior to construction, a protocol for receiving complaints pertaining to the adverse environmental effects of the Designated Project on the current use of lands and resources for traditional purposes. The Proponent shall implement the protocol during all phases of the Designated Project. As part of the implementation of the protocol, the Proponent shall:	
	 communicate the details of the protocol, including the method for submitting a complaint, to the Cree Nation Government and potentially affected parties; 	
8.11	 acknowledge receipt of any complaint attributable to the Designated Project as quickly as possible, within a maximum period of 48 hours after receipt of the complaint; 	Ongoing
	 implement, as soon as technically feasible, any corrective action under the Proponent's control in response to any complaint received, which may include modified or additional mitigation measures; and 	
	 present a summary report each quarter to the Agency, the Cree Nation Government and potentially affected parties of the complaints received during the quarter, the processing time of any complaint received, any corrective action in response to a complaint received and the implementation time of any corrective action. 	



Condition #	Details and Follow-Up of Conditions	Status of Implementation
	Current Use of Lands and Resources for Traditional Purposes	
	Follow-up on condition	
	As mentioned in condition 7.10, GLCI developed a complaint management protocol for the Galaxy project in 2023, in consultation with First Nations.	
	GLCI will submit to the Agency, the Cree Nation Government and potentially affected parties, on a quarterly basis, a summary report including complaints received during the quarter, the timeframes for handling any complaints received, any corrective action taken in response to a complaint received and the timeframe for implementing any corrective action.	
	For the year 2024, no complaints have been received regarding the adverse environmental effects of the designated project on the current use of lands and resources for traditional purposes.	
8.12	The Proponent shall retain the services of a liaison officer from the Cree Nation of Eastmain during all the phases of the Designated Project to inform the First Nations of jobs and contracts offered by the Proponent, ensure harmonious integration of Cree workers into the mine workforce, raise workers' awareness of Cree culture and traditional stewardship of the land, share First Nations' concerns with the Proponent, including land users, and participate in conflict resolution.	Ongoing
	Follow-up on condition A liaison officer from the Cree Nation of Eastmain was hired on May 1, 2024.	
	The Proponent shall develop, in consultation with the Cree Nation of Eastmain, Fisheries and Oceans Canada and other relevant authorities, a plan to salvage fish before drying out Lac Kapisikama.	
	Follow-up on condition	
	Discussions have begun on a plan to recover fish before Lake Kapisikama is drained.	
8.13	In February 2024, the tallyman, Mr. Brian Weapenicappo, and his family met to discuss their interest in participating in the fishery before the lake is dried up. Mr. Weapenicappo expressed his desire to participate in the fishery, or to have one of his family members participate. In August 2024, Eastmain Chief Raymond Shanoush and Brian Weapenicappo were informed again, confirming their interest in participating. In December 2024, the issue was raised again at a meeting of the Environment Committee, which included representatives of the Cree Nation Government and Galaxy. It was clarified that fisheries should be organized before the lake was drained.	Ongoing
	Given that the fish are very small, and that during the last fisheries carried out in 2022 by WSP, several individuals showed parasites under the skin, it has been recommended to compost the fish that will be caught in the	



Condition #	Details and Follow-Up of Conditions	Status of Implementation
	Current Use of Lands and Resources for Traditional Purposes	
	lake.	
8.14	The Proponent shall undertake, in consultation with the tallyman of trapline RE02 and prior to the start of construction, a beaver inventory in watercourse CE2 and undertake an annual beaver inventory during all the phases of the Designated Project. In doing so, the Proponent shall inspect the beaver dams at a frequency determined in consultation with the tallyman of trapline RE02 in order to survey any change in the flow and water level in watercourse CE2, and inform the Cree Nation of Eastmain of these changes.	Ongoing
	Follow-up on condition	
	As mentioned in condition 7.16.4, GLCI, in collaboration with the RE02 tallyman, conducted an inventory of beavers in the watercourses of the study area. The results of this inventory are presented in Appendix T.	
	Inventory results will be presented to the Environment Committee, which includes representatives of the Cree Nation of Eastmain.	
	The Proponent shall develop, in consultation with the First Nations and the tallyman of trapline RE02, a management protocol for black bear (Ursus americanus), which shall include measures to mitigate the effects of the Designated Project on traditional activities pertaining to black bear (Ursus americanus).	
8.15	Follow-up on condition	Completed
	In consultation with the First Nations and the RE02 tallyman, GLCI developed a black bear management protocol and a procedure describing the measures to be taken for interaction with wildlife. This procedure was finalized in 2024 and is presented in Appendix X.	
	The Proponent shall undertake progressive reclamation of the areas disturbed by the Designated Project, except for the pit. In doing so, the Proponent shall:	
8.16 8.16.1 8.16.2 8.16.3 8.16.4 8.16.5	 identify, in consultation with the Cree Nation of Eastmain, the tallymen of traplines RE02, VC33 et VC35, and relevant authorities, the plant species to use for revegetation necessary for progressive reclamation and that support the creation of favourable habitats for migratory birds and species at risk, particularly caribou (Rangifer tarandus); 	Not applicable
	 restore the job site areas and the piles by grading the surfaces, covering them with natural soil, scarifying them or seeding them to favour the recovery of vegetation. The Proponent shall stabilize the disturbed areas, the embankment slopes, and unconsolidated deposit stockpile other stockpiles, as the work is completed; 	
	 characterize the soil quality of each side of the sections of the hauling roads and manage soils according to their degree of 	



Condition #	Details and Follow-Up of Conditions	Status of Implementation
	Current Use of Lands and Resources for Traditional Purposes	
	contamination;	
	 revegetate the disturbed locations in the Designated Project area during the decommissioning phase, using plant species identified in condition 8.16.1; 	
	stabilize the shores of the watercourses disturbed by the construction work as soon as the work is completed; and	
	 in the decommissioning stage, favour the creation of wetlands in low gradient areas adjacent to the revegetated stockpiles of the watersheds of watercourses CE2 and CE3 with the goal of limiting the increase in peak flows and reducing the intake of suspended particulate matter in these watercourses. The Proponent shall ensure that these wetlands are located so that they receive all of the runoff water coming from the stockpiles without threatening the stability of their slopes. 	
	Follow-up on condition	
	Considering that no reclamation activities are required during the period covered by this report, the actions to be implemented to satisfy this condition are not applicable.	
8.17 8.17.1	The Proponent shall develop, prior to construction and in consultation with First Nations, a follow-up program to verify the accuracy of the environmental assessment and to determine the effectiveness of the mitigation measures pertaining to the adverse environmental effects of the Designated Project on the current use of lands and resources for traditional purposes, including cumulative effects. The Proponent shall implement the follow-up program prior to construction and until one year following progressive reclamation and determine, during each consultation referred to in conditions 8.17.2 and 8.17.3 and in consultation with First Nations and the tallymen of traplines VC33 and VC35, whether monitoring for traplines VC33 and VC35 remains necessary and the frequency at which this monitoring needs to be carried out. As part of the implementation of the follow-up program, the Proponent shall: consult, prior to construction, the users of traplines RE02, VC33 and VC35, and the Cree Trappers Association, on the goose and moose harvest rates, the quality of the harvests, residual effects on navigability, the quality of use of the traplines and their access via the Billy-Diamond Highway during the goose and moose hunt periods, in order to characterize the state of the resources and the harvests of valued species;	Ongoing
	Follow-up on condition In 2023, GLCI, in consultation with First Nations, developed a follow-up program to verify the accuracy of the environmental assessment and to assess the effectiveness of mitigation measures with respect to the adverse environmental effects of the designated project on the current	

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Condition #	Details and Follow-Up of Conditions	Status of Implementation
	Current Use of Lands and Resources for Traditional Purposes	
	use of lands and resources for traditional purposes, including cumulative effects. The program was sent to First Nations on April 28, 2023.	
	In May 2023, prior to construction, a meeting was held with users of traplines RE02, VC33 and VC35 and with the Cree Trappers' Association to obtain information on goose and moose harvest rates, harvest quality, navigability, quality of trapline use and access via the Billy-Diamond Highway during goose and moose hunting periods, in order to characterize the resource and harvest status of valued species. The report was presented in the 2023 Annual Report.	
	The next monitoring activities are scheduled for the end of the construction period, in accordance with the follow-up program that has been developed.	
	consult the users of traplines RE02, VC33 and VC35 on the adverse environmental effects of the Designated Project on trapping activities for traditional purposes, particularly the goose and moose harvest rates on the quality of the harvests, residual effects and navigability, and on access to the camps and traplines via the Billy-Diamond Highway during the goose and moose hunt periods;	
8.17.2 8.17.3 8.17.4	• consult the users of traplines RE02, VC33, VC35, RE03 and R08 on the adverse environmental effects of blasting and transport truck traffic associated with the Designated Project on the quality of the use of traplines RE02, VC33, VC35, RE03 and R08, including their access, the goose and moose harvest rates and the quality of the harvests; and	Not applicable
	determine whether modified or additional mitigation measures are necessary based on the results of the monitoring conducted in accordance with conditions 8.17.2 and 8.17.3.	
	Follow-up on condition	
	The next monitoring activities are scheduled for the end of the construction period, in accordance with the follow-up program that has been developed.	
8.18 8.18.1	The Proponent shall develop, prior to construction and in consultation with the Cree Nation of Eastmain, the tallymen of traplines RE02, VC33 and VC35, and relevant authorities, a follow-up program to assess the effectiveness of the progressive reclamation referred to in condition 8.16. The Proponent shall implement the follow-up program for five years following the end of decommissioning. As part of the implementation of the follow-up program, the Proponent shall:	Ongoing
	define the key performance indicators it will use to assess the effectiveness of progressive reclamation; and	



Condition #	Details and Follow-Up of Conditions	Status of Implementation
	Current Use of Lands and Resources for Traditional Purposes	
	Follow-up on condition	
	GLCI has developed an environmental and social follow-up program in consultation with the Cree Nation of Eastmain, the tallymen of traplines RE02, VC33 and VC35, and the relevant authorities. Section 14 of this program was developed to verify the effectiveness of the progressive reclamation referred to in condition 8.16.	
	The follow-up program was finalized in 2024, prior to construction of the project. It will be implemented for five years following decommissioning.	
	monitor soil stability, growth and diversification of the plant species used for revegetation.	
8.18.2	Follow-up on condition Considering that no reclamation activities were carried out during the period covered by this report, the actions to be implemented to satisfy this condition are not applicable.	Not applicable



2.9. GREENHOUSE GASES

This section has been deleted. Conditions 9.1 and 9.2 have been amended and moved to section 7 following receipt of the amended Declaration of Decision dated July 26, 2024.

2.10. PHYSICAL AND CULTURAL HERITAGE AND STRUCTURES, SITES OR THINGS OF HISTORICAL, ARCHAEOLOGICAL, PALEONTOLOGICAL OR ARCHITECTURAL IMPORTANCE

Condition #	Details and Follow-Up of Conditions	Status of Implementation
	Physical and Cultural Heritage and Structures, Sites or Things of Historical, Archaeological, Paleontological or Architectural Importance	
	The proponent shall establish, prior to construction and in consultation with First Nations and relevant authorities, an archaeological and cultural resource protection plan for any structure, site or thing of historical, archaeological, paleontological or architectural significance not previously identified and discovered within the Designated Project area. The proponent shall implement the plan during all phases of the Designated Project. As part of the plan, the Proponent shall state:	
10.1 10.1.1	 the manner in which the Proponent will implement a procedure for dealing with accidental discoveries in the event that previously identified structures, sites or things of historical, archaeological, paleontological or architectural significance are discovered by the Proponent or are brought to the attention of the Proponent by another party during all phases of the Designated Project. As part of the procedure for dealing with accidental discoveries, the Proponent shall: immediately halt work at the location of the discovery, except for actions required to be undertaken to proect the integrity of the 	
10.1.1.1 10.1.1.2 10.1.1.3 10.1.1.4 10.1.1.5	 discovery; delineate an area of at least 600 metres around the discovery as a no-work zone until such a time that the Proponent receives advice issued pursuant to section 76 of Quebec's Cultural Heritage Act and from the qualified individual pursuant to condition 10.1.1.4; inform the Agency, the tallyman of trapline RE02, the Cree Nation Government, the band council of the Cree Nation of Eastmain, the Aanischaaukamikw Cree Cultural Institute, the Ministère de la Culture et des Communications, and other relevant authorities within 24 hours of the discovery, and allow First Nations to monitor archaeological works taking place at the site of the discovery; have a qualified individual, whose expertise pertains to the requirements of Quebec's Cultural Heritage Act, conduct an assessment at the location of the discovery. The terms of reference of this assessment shall be validated by the Cree Nation Government, the band council of the Cree Nation of Eastmain, and the Aanischaaukamikw Cree Cultural Institute; and consult with the Cree Nation of Eastmain, the Aanischaaukamikw Cree Cultural Institute, and relevant authorities on regulations, protocols, and customs related to respecting the discovery, recording, transferring and safekeeping of previously unidentified 	Ongoing



Condition #	Details and Follow-Up of Conditions	Status of Implementation
	Physical and Cultural Heritage and Structures, Sites or Things of Historical, Archaeological, Paleontological or Architectural Importance	
	structures, sites or things of historical, archaeological, paleontological or architectural significance.	
	Follow-up on condition	
	In 2023, GLCI developed, with the help of Arkéos Inc.'s team of archaeologists and in consultation with First Nations and the appropriate authorities, an archaeological resource protection plan for any previously undiscovered structures, sites or things of historical, archaeological, paleontological or architectural significance in the project area. This plan was presented in the 2023 Annual Report. Implementation began as soon as work began on the site and will continue throughout construction. No accidental discoveries were made in 2024.	
10.2	The Proponent shall require that all the employees and contractors associated with the Designated Project, prior to conducting any soil disturbance activity in the Designated Project area, take training given by a qualified individual on the identification of archaeological or cultural remains that may be discovered in the Designated Project and the procedure to follow in case of a fortuitous archaeological discovery referred to in condition 10.1. The Proponent shall document the participation of employees and contractors in this training.	Ongoing
	Follow-up on condition All employees and contractors involved in ground-disturbing activities in the project area have received the training prepared by Arkéos Inc.'s team of archaeologists. Training follow-up is documented in a training log on the Paelo platform.	
	The Proponent shall prepare, prior to construction and in consultation with First Nations and the Social and Cultural Development Department of the Cree Nation Government, a glossary of Cree toponyms that identify in Cree language the geographic locations in the Designated Project area. In doing so, the Proponent shall:	
10.3; 10.3.1; 10.3.2; 10.3.3	 identify in the glossary the existing Cree toponyms of the geographic locations in the Designated Project area. For any location that does not have an existing Cree toponym and for which First Nations or the Social and Cultural Development Department of the Cree Nation Government considers that a toponym is necessary, the Proponent shall determine a Cree toponym for this location in consultation with the Social and Cultural Development Department of the Cree Nation Government and First Nations, and include it in the glossary; present to the Agency, the Social and Cultural Development Department of the Cree Nation Government and First Nations, prior to construction, the glossary and a map of the Designated Project area that includes all Cree toponyms identified in the glossary and 	Completed



Condition #	Details and Follow-Up of Conditions	Status of Implementation
	Physical and Cultural Heritage and Structures, Sites or Things of Historical, Archaeological, Paleontological or Architectural Importance	
	that shows the general layout of the Designated Project infrastructure; and	
	include the Cree toponyms identified in the glossary for any map produced by the Proponent as part of the Designated Project.	
	Follow-up on condition	
	Prior to construction, GLCI developed a glossary of Cree toponyms in consultation with First Nations and the Social and Cultural Development Department of the Cree Nation Government. This glossary identifies, in the Cree language, the geographic locations within the Galaxy project area.	
	The glossary of Cree toponyms was submitted to the IAAC and CNG on February 8, 2024.	
	CNG's comments were received on May 21, 2024, and incorporated into the document. In August 2024, the COMEX indicated that it had no further comments on the document. The amended version of the glossary of Cree toponyms can be found in Appendix Y.	

2.11. INDEPENDENT ENVIRONMENTAL MONITOR

Condition #	Details and Follow-Up of Conditions	Status of Implementation
	Independent Environmental Monitor	
11.1	The Proponent shall retain, prior to construction, the services of a third-party independent environmental monitor, who is a qualified individual in environmental monitoring in Quebec, to independently observe and record on the implementation of follow-up programs set out in this Decision Statement for the duration of each of the programs and present their findings to the Proponent, the Agency, and the Cree Nation Government.	Completed
	Follow-up on condition This condition was completed in 2023; information on compliance with this condition is presented in the 2023 Annual Report.	
11.2	The Proponent shall require the independent environmental monitor to report to the Agency, the Cree Nation Government and the First Nations in writing, prior to or concurrent with reporting to the Proponent on any condition set out in this Decision Statement during construction, operation, and decommissioning.	Ongoing



Condition #	Details and Follow-Up of Conditions	Status of Implementation
	Independent Environmental Monitor	
	Follow-up on condition In the contract awarded by GLCI to Norda Stelo, it is stipulated that the independent environmental monitor must report to the Agency, the Cree Nation Government and the First Nations, in writing, at the same time as he reports to the client (GLCI).	
	The Proponent shall require the independent environmental monitor to present to the Agency and the Cree Nation Government, at a frequency determined in consultation with these parties, the information pursuant to condition 11.2.	
11.3	Follow-up on condition It has been agreed that the environmental monitor will report on the implementation of follow-up programs in accordance with condition 11.1 on an annual basis. The first report should be sent by the independent environmental monitor in Q2 2025.	Ongoing

2.12. ACCIDENTS AND MALFUNCTIONS

Condition #	Details and Follow-Up of Conditions	Status of Implementation
	Accidents and Malfunctions	
12.1	The Proponent shall take all reasonable measures to prevent accidents and malfunctions that may result in adverse environmental effects and mitigate any adverse environmental effect from accidents and malfunctions that does occur. In doing so, the Proponent shall:	
	 ensure the availability of equipment necessary to respond to any accident or malfunction identified pursuant to condition 12.3.1; and maintain readily accessible petroleum and hazardous material recovery kits at all times on the job site, as well as absorbent materials in each piece of job site equipment and conduct an annual audit of the contents of the emergency kits. 	
12.1.1 12.1.2	Follow-up on condition	Ongoing
	All reasonable measures were taken to prevent accidents and malfunctions that could lead to adverse environmental effects, and to mitigate any adverse environmental effects that might have occurred. Good environmental practices (use of sedimentation pockets, sediment barriers where necessary, settling basins, retention tanks under mobile equipment, etc.) were promoted by daily work surveillance.	
	This ensured that the equipment needed to respond to any accident or malfunction was available. In addition, emergency recovery kits for petroleum products and hazardous materials were always readily available.	



12.2	The Proponent shall consult, prior to construction, First Nations, the Cree Board of Health and Social Services of James Bay, and relevant authorities about the measures to be implemented to prevent accidents and malfunctions. Follow-up on condition This condition was completed in 2023; information on compliance with this condition is presented in the 2023 Annual Report.	Completed
12.3 12.3.1 12.3.2 12.3.2.1 12.3.2.2 12.3.3 12.3.4 12.3.5	The Proponent shall develop, prior to construction and in consultation with First Nations, the managers of the kilometre 381 roadstop, the Cree Board of Health and Social Services of James Bay, and relevant authorities, an accident and malfunction response plan in relation to each phase of the Designated Project. The accident and malfunction plan for each phase shall include: • a description of the types of accidents and malfunctions that may cause adverse environmental effects during any phase of the Designated Project; • the measures, including organizational and management measures, to be implemented in response to each type of accidents and malfunctions referred to in condition 12.3.1 to mitigate any adverse environmental effect caused by the accident or malfunction. These measures include: • specific intervention procedures, particularly in the event of oil spills or spills of any other dangerous substance; and • evacuation and confinement criteria in regards to the different types of accidents and malfunctions. • a map identifying the locations where the mitigation measures referred to in condition 12.3.2 are to be implemented, including information regarding site specifics that should be communicated to external emergency responders who may be on site, such as cellular reception; identification of resources for the exclusive use of the project in the event of an emergency, distinguishing these resources from those that may also be used by the public, such as the ambulance at the kilometre 381 roadstop; and • for each type of accident and malfunction referred to in condition 12.3.1, the roles and responsibilities of the Proponent and each applicable relevant authority in implementing the measures referred to in condition 12.3.2 (including for mobilizing emergency response equipment).	Completed



12.4	The Proponent shall maintain the accident and malfunction response plan referred to in condition 12.3 up-to-date during the applicable phase of the Designated Project. The Proponent shall submit any updated accident and malfunction response plan to the Agency, the Cree Nation Government and parties consulted during the development of the plan within 30 days of the plan being updated. Follow-up on condition	Ongoing
	The accident and malfunction response plan referred to in condition 12.3 is kept up to date. The latest version of the plan was submitted to the Agency, the Cree Nation Government and the parties consulted on March 18, 2024.	
	In the event of an accident or malfunction with the potential to cause adverse environmental effects, including an accident or a malfunction referred to in condition 12.3.1, the Proponent shall immediately implement the measures appropriate to the accident or malfunction, including any measure referred to in condition 12.3.2, and shall: o implement the communication plan referred to in condition 12.6;	
	o notify, as soon as possible and pursuant to the communication plan referred to in condition 12.6, First Nations, the Cree Nation Government, the Cree Board of Health and Social Services of James Bay, and relevant authorities of the accident or malfunction, and notify the Agency in writing no later than 24 hours following the accident or malfunction. When notifying First Nations, the Cree Nation Government, the Cree Board of Health and Social Services	
12.5 12.5.1	of James Bay and the Agency, the Proponent shall specify: the date and time when and location within the Designated Project area where the accident or malfunction occurred;	
12.5.2 12.5.2.1 12.5.2.2	 a summary description of the accident or malfunction; 	
12.5.2.3	a result of the accident or malfunction;	
12.5.3 12.5.3.1 12.5.3.2	and the Cree Board of Health and Social Services of James Bay no later than 30 days after the day on which the accident or malfunction	En continu
12.5.3.3 12.5.3.4	occurred. The written report shall include: o a detailed description of the accident or malfunction and of its	
12.5.3.5 12.5.3.6 12.5.4	adverse environmental effects; o a description of the measures that were taken by the Proponent to mitigate the adverse environmental effects caused by the accident or malfunction:	
	or malfunction; o a list of the relevant authorities notified pursuant to condition 12.5.2;	
	o any view from First Nations and advice from relevant authorities received with respect to the accident or malfunction, its adverse environmental effects and the measures taken by the Proponent to mitigate these adverse environmental effects;	
	 a description of any residual adverse environmental effect and any modified or additional measure required by the Proponent to mitigate residual adverse environmental effects; and 	
	 details concerning the implementation of the accident or malfunction response plan referred to in condition 12.3. 	
	 submit a written report to the Agency, the Cree Nation Government, and the Cree Board of Health and Social Services of James Bay, no later than 90 days after the accident or malfunction occurs, and 	



	taking into account the information submitted pursuant to condition 12.5.3, which shall include a description of the changes made to prevent a recurrence of such accident or malfunction and the implementation of any modified or additional measures to mitigate and monitor residual adverse environmental effects and to carry out any necessary progressive reclamation. The report shall include any additional views of First Nations and advice of relevant authorities received by the Proponent, if any, since the views and advice referred to in condition 12.5.3.3 were received by the Proponent.	
	Follow-up on condition There have been no accidents or malfunctions that could have led to adverse environmental effects.	
12.6 12.6.1 12.6.2 12.6.3	 The Proponent shall develop, in consultation with First Nations, a communication plan for Designated Project accidents and malfunctions. The Proponent shall develop the communication plan prior to construction and shall implement and keep it up to date during all phases of the Designated Project. The plan shall include: the types of accidents and malfunctions requiring the Proponent to notify the First Nations; the manner by which First Nations shall be notified by the Proponent of an accident or malfunction and of any opportunity for the First Nations to assist in the response to the accident or malfunction; and the contact information that First Nations may use to communicate with the Proponent and the contact information for each Indigenous 	Ongoing
	group that the Proponent shall use to provide notification. Follow-up on condition	
	In consultation with First Nations, among others, GLCI developed a communications plan for the Galaxy project. This plan was presented as an appendix to the 2023 Annual Report.	
	The communication plan is being implemented and will be updated as needed.	



2.13. SCHEDULES

Condition #	Details and Follow-Up of Conditions	Status of Implementation
	Schedules	
13.1	The Proponent shall submit to the Agency and the Cree Nation Government a schedule for all conditions set out in this Decision Statement no later than 60 days prior to the start of construction. This schedule shall detail all activities planned to fulfill each condition set out in this Decision Statement and the commencement and estimated completion month(s) and year(s) for each of these activities.	Completed
	Follow-up on condition	, , , , , , , , , , , , , , , , , , ,
	The schedule for the implementation of all the conditions set out in this Decision Statement was submitted to the Agency and the Cree Nation Government on November 1, 2023. Information on compliance with this condition is presented in the 2023 Annual Report.	
13.2	The Proponent shall submit to the Agency and the Cree Nation Government a schedule outlining all activities required to carry out all phases of the Designated Project no later than 60 days prior to the start of construction. The schedule shall indicate the commencement and estimated completion month(s) and year(s) and duration of each of these activities.	Completed
13.2	Follow-up on condition	Completed
	A preliminary schedule for the Galaxy project was submitted to the Agency and the Cree Nation Government on October 16, 2023. Information on compliance with this condition is presented in the 2023 Annual Report.	
	The Proponent shall submit to the Agency and the Cree Nation Government in writing an update to schedules referred to in conditions 13.1 and 13.2 every year no later than March 31, until completion of all activities referred to in each schedule.	
13.3	Follow-up on condition	Ongoing
	At the time of writing this report and up to the date of submission, i.e. March 31, 2025, there has been and there will be no updating of the schedules mentioned in conditions 13.1 and 13.2, as no activities are planned until the final investment decision has been obtained.	
13.4	The Proponent shall submit to the First Nations the schedules referred to in conditions 13.1 and 13.2 and any update or revision made to the schedules pursuant to condition 13.1 at the same time that the Proponent submits these documents to the Agency.	
	Follow-up on condition	Ongoing
	The updated schedules referred to in conditions 13.1 and 13.2 were submitted to the First Nations at the same time as to the Agency on March 31, 2024.	



2.14. RECORD-KEEPING

Condition #	Details and Follow-Up of Conditions	Status of Implementation
	Record-Keeping	
14.1	The Proponent shall maintain all records relevant to the implementation of the conditions set out in this Decision Statement. The Proponent shall retain the records and make them available to the Agency and the Cree Nation Government throughout construction and operation and for 25 years following the end of operation or until the end of decommissioning of the Designated Project, whichever comes first. The Proponent shall provide the aforementioned records to the Agency and the Cree Nation Government upon demand within a timeframe specified by the Agency and the Cree Nation Government.	Ongoing
	Follow-up on condition GLCI maintains all records relevant to the implementation of the conditions of the Decision Statement and undertakes to provide the Agency and the Cree Nation Government with such documents upon request, within the timeframe specified by the Agency and the Cree Nation Government.	
14.2	The Proponent shall retain all records referred to in condition 14.1 at a facility in Canada and shall provide the address of the facility to the Agency and the Cree Nation Government. The Proponent shall notify the Agency at least 30 days prior to any change to the physical location of the facility where the records are retained, and shall provide to the Agency and the Cree Nation Government the address of the new location.	Ongoing
	Follow-up on condition	
	All records referred to in condition 14.1 are kept in Canada, at GLCI's head office at:	
	800-2000 Mansfield, Montreal, Quebec H3A 2Z5	
14.3	The Proponent shall notify the Agency and the Cree Nation Government of any change to the contact information of the Proponent in this Decision Statement.	
	Follow-up on condition	Ongoing
	The promoter's contact details have not changed since 2023.	

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APPENDICES



APPENDIX A – 2024 CONSULTATION REGISTER



APPENDIX B – INSTALLATION OF OBSERVATION WELLS (PHASE 2) - PRESENTATION OF WORK AND GROUNDWATER QUALITY ANALYSES (WSP, 2024)



APPENDIX C – ENVIRONMENTAL MONITORING - GROUNDWATER QUALITY 2024 (WSP, 2025)



APPENDIX D – GEOMEMBRANE WATERPROOFING MONITORING AND QUALITY ASSURANCE PROGRAM (ALPHARD GROUP, 2025)



APPENDIX E – WATERCOURSES NEAR INFRASTRUCTURES



APPENDIX F – ENVIRONMENTAL MONITORING - SURFACE WATER QUALITY (WSP, 2025)



APPENDIX G - HYDROLOGICAL MONITORING REPORT(WSP, 2025)



APPENDIX H - ENVIRONMENTAL MONITORING - AVIFAUNA (WSP, 2024)



APPENDIX I - ENVIRONMENTAL MONITORING - BATS (WSP, 2025)



APPENDIX J - ENVIRONMENTAL MONITORING - WOODLAND CARIBOU (WSP, 2025)



APPENDIX K1 –(WSP, 2025) WETLAND COMPENSATION PLAN - ACTIVITY REPORT 2024



APPENDIX K2 – MINUTES OF MEETING – WETLAND COMPENSATION PROJECT



APPENDIX L – ENVIRONMENTAL MONITORING - WETLANDS (WSP, 2025)



APPENDIX M – ENVIRONMENTAL MONITORING - INVASIVE ALIEN PLANT SPECIES (IAPS) (WSP, 2024)



APPENDIX N – TRAFFIC PLAN (GMINING, 2024)



APPENDIX O - CONCERNS AND COMPLAINTS OF EXTERNAL STAKEHOLDERS



APPENDIX P1 – POLICY AIMED AT REDUCING FUEL CONSUMPTION OF EQUIPMENT AND VEHICLES



APPENDIX P2 - PROCEDURE - USE OF MACHINERY AND VEHICLES

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APPENDIX Q -ENVIRONMENTAL CHARACTERIZATION - AIR QUALITY STUDY - GALAXY PROJECT, JANUARY 2024 TO DECEMBER 2024



APPENDIX R - ENVIRONMENTAL MONITORING - NOISE MEASUREMENTS TAKEN AT KM 381 TRUCK STOP (WSP, 2024)

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APPENDIX S – ENVIRONMENTAL MONITORING - TRADITIONAL FOOD QUALITY (PLANT COMPONENT) (WSP, 2025)



APPENDIX T – ENVIRONMENTAL MONITORING - TRADITIONAL FOOD QUALITY (BEAVER COMPONENT) (WSP, 2025)



APPENDIX U – ENVIRONMENTAL MONITORING – TRADITIONAL FOOD QUALITY (FISH COMPONENT) (WSP, 2025)



APPENDIX V - COMMUNICATION PLAN

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APPENDIX W - CREE CULTURE AWARENESS PROGRAM



APPENDIX X – MANAGEMENT PROTOCOL WITH BLACK BEAR - WOLF - FOX

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APPENDIX Y – GLOSSARY OF CREE TOPONYMS

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