



Sent by email only

March 28, 2014

Mr. Clément D' Astous
Deputy Minister
Ministère du Développement durable,
de l'Environnement et de la Lutte contre les changements climatiques
Édifice Marie-Guyart, 30th floor
675 René-Lévesque Blvd. E.
Quebec City, Quebec, G1R 5V7

Subject: Wind turbine farm at the Raglan Mine site
(Your reference: 3215-10-007)

Dear Sir,

As part of the environmental and social impacts assessment and review procedure set out in Chapter II of the *Environment Quality Act*, the Kativik Environmental Quality Commission has reviewed the impact study on the above project forwarded on June 13, 2013 and the additional information sent February 4, 2014 by Mireille Paul of your department.

Raglan Mine plans to build and operate a wind farm at the Katinniq mine site. The project will be implemented in two phases and involves six wind turbines with a rated power of 3 MW each. This energy will be fed into the existing power grid. The project also includes a hydrolysis unit and hydrogen storage. This last component will be used when wind energy exceeds the load demand so as to be converted into fuel instead of being dissipated. The first phase involves the installation of one wind turbine as well as the hydrolysis unit and hydrogen storage. Based on performance results of this wind turbine, the other five turbines will be installed in the second phase.

This project will allow Raglan Mine to reduce annual greenhouse gas emissions by 6,447 CO₂ equivalent tonnes. The Commission recognizes the importance of this effort by Raglan. However, during our analysis of the project, certain issues emerged, particularly in with regards to the impacts on avian fauna and also safety concerns about the hydrolysis unit and the hydrogen storage.

...2

After reviewing all information provided, and pursuant to the provisions set out in Section 23.3.20 of the *James Bay and Northern Quebec Agreement* and Section 200 of the *Environment Quality Act* (RSQ, Chapter Q-2), the Commission has decided to authorize the project for the construction of wind turbines at Kattiniq. However this decision comes with the following conditions:

Condition 1

Six (6) months before the pilot turbine is put into operation, the proponent must file for the approval of the Administrator a program for monitoring avian mortality. The monitoring program must make it possible to assess the mortality rates of all bird species that can be linked to the presence or operation of the turbines.

The program must also assess the relevance of a study on how the behaviour of species such as caribou and geese may be affected during migration by the arrival of the pilot turbine and later, the wind farm. The monitoring program should pay particular attention to species that are rare, threatened, or vulnerable or at risk of becoming so.

The program must extend for three (3) years after the six turbines at the wind farm are put into operation. The methods and timeframes for census-taking must comply with the protocols established by the relevant government agencies and be submitted to them no later than one month before the start of monitoring. If the situation warrants, specific mitigation measures developed in collaboration with these same agencies should be implemented in the first year of monitoring, which may themselves require monitoring.

Condition 2

Before the work begins, the proponent must establish a monitoring and coordinating committee. The committee's composition and mandate must be submitted to the Administrator for information. The monitoring and coordinating committee must be active through the construction, operational and decommissioning phases of the wind farm. Ideally, this committee should come from an existing communications structure between the proponent and the communities of Salluit and Kangiqsujuaq. The role of this committee will be to gather and process comments from the population and also to participate in the review of the emergency measures plan and of the monitoring reports. The committee should also provide a communication plan so that citizens can submit their comments.

Condition 3

An environmental monitoring report must be submitted to the Administrator after the first year of the construction phase, and annually thereafter. This report will describe the progress of construction work, the problems encountered in the course of regular operations of the project and the solutions implemented. The report must include the results from the monitoring required under conditions 1 and 2. The report will be based on the previous year's data and will propose mitigation measures, if appropriate.

...3

Condition 4

Before construction begins, the proponent must prepare an emergency measures plan for potential accident and failure risks. This plan must be submitted to the Administrator for information six (6) months before the start of operations.

Condition 5

After the pilot turbine phase and before the other five (5) turbines are put into operation, the proponent must submit for the Administrator's approval a report on changes and updates to the March 2013 impact study that result from optimizing the project. This report must include anticipated social and environmental impacts that could change after the pilot phase, and contain the following information:

- Performance and efficiency of the pilot turbine;
- Cost-effectiveness in a northern context;
- Findings on actual project impacts versus expected impacts.

Condition 6

Before the pilot wind turbine is put into operation, the proponent must submit to the Administrator for information the details on the plan for dismantling the turbines and their foundations along with access roads and the infrastructure for the hydrogen storage. In addition, the proponent must submit a program for the management of waste resulting from the dismantling or produced during operations. The decommissioning plan for the wind farm project should be tied to the decommissioning plan for Raglan Mine, updated every five (5) years, and considered an integral part of the "Redevelopment and Restoration" section of the certificate of authorization issued for the Raglan Mine project on May 5, 1995.

Yours truly,

A handwritten signature in black ink that reads "Peter Jacobs." The signature is written in a cursive style with a large, looping initial "P" and "J".

Peter Jacobs
Chairman