

**ATTACHMENT: 2023-06-10****Federal Authority Advice Record (FAAR)**

Strange Lake Rare Earth Mining Project – Torngat Metals Ltd.

Registry reference # 85969

Department/Agency	Fisheries and Oceans Canada
Lead Contact	<b>Vincent Carrier (Quebec region)</b> <b>Kate Tobin (Newfoundland and Labrador Region)</b>
Full Address	850, Route de la Mer, Mont-Joli (Québec) G5H 3Z4 80 East White Hills Road, St. John's, NL, A1C 5X1
Email	Vincent.Carrier@dfo-mpo.gc.ca Kate.Tobin@dfo-mpo.gc.ca
Telephone	n.d.
Alternate Contact	Annaïg Kervella, biologiste principale par intérim, équipe Mines (Quebec Region) Kimberley Keats, Team Lead, Impact Assessment and Major Projects (Newfoundland and Labrador Region)

1. Is it probable that your department or agency may be required to exercise a power or perform a duty or function related to the Project to enable it to proceed?

If yes, specify the Act of Parliament and that power, duty or function.

Authorization under sections 34.4(2)(b) and 35(2)(b) of the *Fisheries Act* may be required for proposed works, undertakings or activities, other than fishing, that are likely to result in the “death of fish” and/or “the harmful alteration, disruption or destruction of fish habitat.” The initial project description does not include sufficient information on fish and fish habitat, or on the effects of the project on watercourses and water bodies, to determine whether such authorization will be required. In addition, one or more aspects of the project may be subject to the *Aquatic Invasive Species Regulations*, for which Fisheries and Oceans Canada (DFO) is responsible for administration and enforcement, and to the *Metal and Diamond Mining Effluent Regulations*, for which DFO acts as an expert advisor to Environment Canada at various stages of the process.

In addition, DFO assesses the impacts of projects on aquatic species at risk and/or their critical habitat(s), under sections 32, 33 and subsection 58(1) of the *Species at Risk Act*. Based on the initial project description, it is likely that a species listed in Schedule 1 of this Act will be present.

1b. Please describe any Indigenous or public consultation that will be undertaken in relation to the exercise of that power, duty or function, including when it would take place.

Should an authorization be required following submission of the application, the duty to consult and, where appropriate, accommodate aboriginal communities, whose aboriginal or treaty rights may be affected by regulatory decisions made under the *Fisheries Act* and the *Species at Risk Act*, is required under section 2.4 of the *Fisheries Act*. This may include consultation and/or accommodation on potential impacts on Canada's aboriginal peoples and/or the traditional use of territories and resources in relation to fish and fish habitat. As for public consultations, DFO does not currently provide opportunities for public participation prior to the issuance of an authorization, however information on the authorization issued will subsequently be made available to the public via the *Fisheries Act* registry. DFO will also support the Impact Assessment Agency during consultations, Indigenous and public, on matters relevant to our mandate.

2. Is your department or agency in possession of specialist or expert information or knowledge that may be relevant to the conduct of an impact assessment of the Project?

Specify the specialist or expert information or knowledge.

Yes.

DFO recommends that the proponent review the following relevant guidance documents including:

- <https://www.gazette.gc.ca/rp-pr/p2/2019/2019-08-21/html/sor-dors286-fra.html> - August 2019.
- [Policy on the Application of Measures to Compensate for Adverse Impacts to Fish and Fish Habitat under the Fisheries Act](#) - December 2019.
- [Interim Policy for Establishing Fish Habitat Banks to Support the Administration of the Fisheries Act and the Species at Risk Act](#) - February 2021.
- [Periods of low risk \(when work can be carried out\) to fish and fish habitat in freshwater environments \(dfo-mpo.gc.ca\)](#).
- Guidelines for Watercourse Crossings in Quebec. 2016 edition: <https://www.qc.dfo-mpo.gc.ca/infoceans/en/infocean/protecting-fisheries-watercourse-crossings>.
- Best Management Practices for the Protection of Freshwater Fish Habitat in Newfoundland and Labrador, Edition 2022. <https://www.dfo-mpo.gc.ca/pnw-ppe/ffhpp-ppph/publications/nfl-freshwater-protection-eau-douce-tnl-eng.html>
- [Measures to Protect Fish and Fish Habitat \(dfo-mpo.gc.ca\)](#).
- Map of aquatic species at risk. <https://www.dfo-mpo.gc.ca/species-especes/sara-lep/map-carte/index-eng.html>
- Species at Risk Public Registry. <https://www.dfo-mpo.gc.ca/species-especes/sara-lep/map-carte/index-eng.html>
- [Aquatic Invasive Species Regulations](#) (dfo-mpo.gc.ca).

Various other relevant documents are available at the following link:

FR: <https://www.dfo-mpo.gc.ca/pnw-ppe/reviews-revues/request-review-demande-d-examen-001-fra.html>

ENG: <https://www.dfo-mpo.gc.ca/pnw-ppe/reviews-revues/request-review-demande-d-examen-001-eng.html>

DFO can provide information or expertise on the assessment of effects on fish and fish habitat in relation to the *Fisheries Act*. DFO can provide information to the proponent to avoid and mitigate adverse effects of proposed works, undertakings or activities. If required, DFO can assess the offsetting measures that will be proposed to offset residual effects on fish and fish habitat. Information is already available at <https://www.dfo-mpo.gc.ca/pnw-ppe/reviews-revues/request-review-demande-d-examen-001-fra.html>.

In addition, DFO can also provide specialized information or knowledge on the assessment of effects on aquatic species at risk and their habitat, under the *Species at Risk Act*, and on aquatic invasive species, fisheries, marine mammals, sea turtles and other aquatic resources.

3. Has your department or agency considered the Project; exercised a power or performed a duty or function under any Act of Parliament in relation to the Project; or taken any course of action that would allow the Project to proceed in whole or in part?

Specify.

No, DFO has not exercised a power or performed a duty or function under any Act of Parliament or taken any course of action.

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4. Has your department or agency had previous contact or involvement with the proponent or other party in relation to the Project? (for example: an enquiry about methodology, guidance, or data; introduction to the project)

Provide an overview of the information or advice exchanged.

Yes, DFO Newfoundland and Labrador Region and Quebec Region have been in contact with the proponent through a series of e-mail exchanges between March and June 2023, as well as a virtual meeting on June 28, 2023, to clarify certain requirements and guidelines, to be used during the Impact Assessment and regulatory phase, for planning the characterization of streams and water bodies in the project area that have the potential to be directly or indirectly impacted, and the related biological inventories.

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5. Does your department or agency have additional information or knowledge not specified, above, including information on the geographic, environmental, economic or social context of the project? (e.g. location of protected or sensitive areas, previous history between local communities and proponent or similar projects, local or regional social or economic concerns)?

Specify as appropriate.

No.

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6. What are the key issues likely to be relevant to the public interest decision, based on the mandate and area(s) of expertise of your department, and which should be addressed in an impact assessment of the Project, should the Agency determine that one is required?

For each key issue:

- Describe the effect or the nature of the issue, including any relevant context;
- Provide the rationale and/or evidence for why it is a key issue;
- Provide advice on how to address the issue, including any information or studies that should be required in the Tailored Impact Statement Guidelines, potential mitigation measures, and/or regulatory requirements relevant to the issue;
- Provide a concise, plain-language summary of the issue for inclusion in the Summary of Issues.

The information provided will be used by the Agency to determine if and an impact assessment is required and where appropriate to develop project-specific draft Tailored Impact Statement Guidelines that focus on the key issues likely to be relevant to the public interest decision.

Please use table 1 to respond to this question.

See table 1.

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7. Where possible, identify any clarifications or additional information the Proponent could include in the Detailed Project Description or in the response to the Summary of Issues that would:

- give confidence that an issue or effect could be addressed and managed;
- inform the decision as to whether an impact assessment is required; or
- aid in tailoring the Impact Statement Guidelines, if an impact assessment is required.

These clarifications and additional information will be included as specific questions in the Summary of Issues provided to the proponent

Please use table 2 to respond to this question.

At this stage of the project, there is too little information about the biophysical environment and potential impacts of the project to determine what additional details and information the proponent could include in its detailed project description or in its response to the summary of questions.

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**Québec:**

Stéphanie Rioux

Name of Departmental / Agency Responder

A/Team Lead, Regulatory Reviews - Fish and Fish Habitat Protection Program, Fisheries and Oceans Canada/Government of Canada

Title of Responder

10<sup>th</sup> November 2023

Date

**Newfoundland and Labrador:**

Jason Kelly

Name of Departmental / Agency Responder

Manager, Regulatory Reviews - Fish and Fish Habitat Protection Program, Fisheries and Oceans Canada/Government of Canada

Title of Responder

10<sup>th</sup> November 2023

Date

**Table 1: Key Issues to inform decision-making**

The Agency asks that federal authorities align expert advice with the Agency’s approach to tailoring, which focuses on key issues or effects that are likely to be relevant to the public interest decision. In identifying key issues, federal authorities should be mindful of the Project’s context (size, scope, location), Indigenous knowledge and perspectives, and public concerns. Key issues that may be relevant to the public interest decision include:

- effects that may be significant, based on federal experts’ knowledge and experience with past projects;
- effects that may impact Indigenous peoples and their rights, based on Indigenous knowledge and perspectives or experience with past projects;
- effects on key species or habitats (e.g. at risk, important to Indigenous communities, commercial importance, provide important ecosystem function);
- issues or effects that may result from novel project activities, components or technology;
- effects with large uncertainties, including in the effectiveness of mitigation measures;
- transboundary effects where mitigation measures are limited;
- positive effects, including where project may support other governmental priorities, including reconciliation with Indigenous peoples; and
- key concerns raised by Indigenous or local communities.

Effects that are anticipated to be minor or which can be managed using well understood mitigation measures, existing guidance, and/or other regulatory processes may have simplified information requirements or may be removed entirely. Measured advice from federal authorities on key issues and solutions —and on the scope and detail of any required information and studies — will enable the Agency to focus assessments on issues that are important to participants and to decision-makers.

Comment ID	Valued Component or Factor to Consider	Description of Key Issue (Context and Rationale)	Solutions	Plain language summary for inclusion in Summary of Issues
<p><i>Please identify organization and comment number. e.g.: IAAC-01</i></p>	<p><i>Identify valued component(s) or factor to consider—within the mandate of your department or agency—to which the effect of issue applies.</i></p>	<p><i>Provide a brief description of the issue and rationale for being a key issue.</i></p> <p><i>Include, where relevant,:</i></p> <ul style="list-style-type: none"> <li>• <i>the pathway of effects;</i></li> <li>• <i>social, economic or environmental context which are relevant to it being a key issue;</i></li> <li>• <i>key uncertainties that should be addressed in the impact assessment;</i></li> </ul>	<p><i>Where applicable, briefly identify solutions to address the potential issue or effects including</i></p> <ul style="list-style-type: none"> <li>• <i>Information or studies required to describe and characterize the effect, should an impact assessment be required; including any guidance for data collection and/or analysis or existing data sources to inform the assessment;</i></li> </ul>	<p><i>For issues to be included in the Summary of Issues, provide a concise, plain language synopsis of the key issue and any questions or directions for the proponent.</i></p>

		<ul style="list-style-type: none"> <li>• <i>Indigenous or public concerns or perspective;</i></li> <li>• <i>potential for differential effects among diverse subgroups;</i></li> <li>• <i>scientific evidence or traditional knowledge, including from past project experience, which supports inclusion as a key issue.</i></li> </ul>	<ul style="list-style-type: none"> <li>• <i>Any powers, duties or functions that your department or agency has that may mitigate, manage, or set conditions related to the effect;</i></li> <li>• <i>Guidance or policies for mitigating effects or any standard and well-understood mitigation measures that would address the effect, including follow-up monitoring activities; and/or</i></li> <li>• <i>Commitments the proponent could make to respond to the issue.</i></li> </ul> <p><i>Where available, please refer to existing text in the TISG template.</i></p>	
DFO-01	Fish and fish habitat / identification, determination and delimitation of watercourses and water bodies potentially affected by the project	In several places of the initial project description (IPD), the proponent has narrowed down the selection of watercourses and bodies characterized. For example, only part of Lac Brisson was characterized, due to its size (section 14.2.2.1.1), a ground assessment was limited to the main watercourses (section 14.2.2.1.1), and future studies in Lac Napeu will be limited to the upstream portion where secondary effluents may flow. In addition, the locations presented for the next studies seem to indicate that work will focus mainly on a few streams and water bodies.	The characterization zone must make it possible to determine and delimit all potential effects on aquatic environments and fish communities, whether they be direct effects (e.g., backfilling in fish habitat by a waste rock pile resulting in the destruction of fish habitat, or the use of explosives near water resulting in fish mortality) or indirect effects resulting in the modification of fish habitat (e.g., the effects of lowering the water table for dewatering a pit on surrounding streams and lakes, the modification of flows by effluent discharge, sediment suspension).	Need to provide a detailed baseline of water bodies and watercourses directly or indirectly affected or likely to be affected, irrespective of the project variants chosen.
DFO-02	Fish and fish habitat/ Aquatic habitat	A comprehensive description of the baseline status of fish communities (e.g. fish composition, abundance and habitat	To enable DFO to subsequently analyze the effects of the project on fish and fish habitat, the proponent	Need to provide up to date information on the characteristics of fish and fish habitat in water bodies

	<p>characterization and fish community assessment</p>	<p>use) and fish habitat (e.g. habitat size and quality, water, substrate and aquatic vegetation conditions) within all water bodies potentially affected directly or indirectly by the project is incomplete or missing in section 14.2.2 of the Initial Project Description (IPD). In addition, the sampling locations described for the studies carried out in the same section are incomplete. This lack of information fuels uncertainties regarding the potential impacts to fish and fish habitat.</p> <p>Baseline data acquired in 2011 and 2012 is not sufficient for characterization of fish and fish habitat. Baseline data acquired in the 2023 and 2024 field studies is necessary to characterize the fish habitat in the project area.</p>	<p>must ensure that the data and information collected to characterize the environment are sufficient in quantity and quality to provide an adequate representation of the environment affected by the project. Among other things, the proponent must describe the physical characteristics, physico-chemical characteristics and water regime of the watercourses and waterbodies on which effects are anticipated.</p> <p>With regard to the biological environment, for all watercourses or bodies of water on which the project is likely to have effects, the proponent must describe, but not limit itself to, the fish species present on the basis of the inventories carried out and the data available (electric and experimental fishing, government and historical databases sport fishing data, etc.), specify the location and life stages of the fish species present and the location, surface areas and functions of potential or confirmed fish habitats (spawning, rearing, growth, feeding, migration, shelter, winter survival).</p>	<p>and watercourses that may be directly or indirectly affected by the project.</p>
DFO-03	<p>Fish and fish habitat / Anticipated effects of the project on fish and fish habitat</p>	<p>The IPD lacks a complete description of the works/undertakings/activities, including but not limited to duration and periods of execution, work methods and permanent and temporary footprint, as well as a description of the potential direct and indirect impacts of the various works/undertakings/activities on fish and fish habitat. This includes construction and use of the storage and handling</p>	<p>The proponent must accurately determine the anticipated effects of its project on, but not limited to, the physical, physico-chemical and biological characteristics and water regime of all watercourses and waterbodies indirectly or directly affected by the project, and include the resulting potential effects on fish and fish habitat, including but not limited</p>	<p>The proponent needs to provide DFO with a complete description of project components to accurately determine the anticipated effects of the project on fish and fish habitat for all watercourses and waterbodies directly or indirectly affected or likely to be affected, regardless of the variants chosen.</p>

		facility to be developed at the port of Voisey's Bay.	to the harmful alteration and/or destruction or disruption of fish habitat and/or fish mortality.	
DFO-04	Fish and their habitat / aquatic species at risk or of precarious status	Species at risk, including the American eel designated as threatened by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC), could potentially be adversely affected by the project's structures, undertakings or activities.	DFO considers it important for the proponent to mention the closest occurrences of these species observed, as well as information relating to these occurrences, such as the habitat where the individuals were captured. In addition, the proponent must also identify habitats likely to be used by these species in water bodies potentially directly or indirectly affected by project works/undertakings/activities.	Need to document the presence of species of precarious status in watercourses and bodies of water likely to be impacted by the project, as well as to identify habitats potentially impacted by the project and likely to be used by these species.
DFO-05	Species at risk / Other species at risk in or near study areas	The proponent indicates that there are no species at risk listed in Schedule 1 of the <i>Species at Risk Act</i> (2002) in or near the characterization zones. However, the project activities may potentially be carried out in proximity to other aquatic species at risk, such as several marine mammals.	Under the <i>Species at Risk Act</i> (2002), the proponent must consider the potential presence and use of all or part of an area by an aquatic species at risk. They must then precisely determine the anticipated impacts of the project, which include harm, harassment, capture, taking, mortality, destruction/disruption/loss of habitat as well as destruction/disruption/loss of critical habitat or a residence, and which are prohibited under the <i>Fisheries Act</i> (2019) and the <i>Species at Risk Act</i> (2002).	The proponent must consider the potential presence and use of all or part of an area by an aquatic species at risk.
DFO-06	Fish and fish habitat / work schedule	The proponent has included a summary schedule of the project's planning and execution stages.	The schedule should describe the construction period, frequency and duration of works/undertakings/activities associated with the project, to enable assessment of the project's effects on fish and fish habitat.	Need for a more detailed project schedule including all works/undertakings/activities likely to have an effect on fish and fish habitat.
DFO-07	Fish and fish habitat / mitigation measures	The proponent does not fully address mitigation measures for the potential effects of the project on fish or fish	When it is determined that works/undertakings/activities could have effects on fish and fish habitat,	Need to present a more comprehensive list of mitigation measures taken or planned to

		habitat that are anticipated to avoid or reduce fish mortality and the harmful alteration, disruption, or destruction of fish habitat. Measures must be taken into account.	the proponent must, after considering and documenting the possibility of relocating or modifying the project to avoid these effects, propose mitigation measures to attempt to reduce the project's effects on fish and fish habitat.	mitigate the effects of the project on fish and fish habitat.
DFO-08	Fish and fish habitat / Offsetting plan	The proponent does not address fish habitat offsetting despite anticipated habitat destruction and disruption.	In the event of residual adverse effects, after the implementation of avoidance and mitigation measures, the proponent will be required to obtain an authorization from DFO under sections 34.4 (2) b) and 35 (2) b) of the <i>Fisheries Act</i> and submit an offsetting plan to offset the harmful alteration, disruption or destruction of fish habitat and/or fish mortality. DFO invites the proponent to look at suitable offsetting options now. Indeed, finding suitable offsetting projects with significant benefits for fish and fish habitat can be a major challenge. Offsetting projects must: 1) support fisheries management objectives and give priority to restoring degraded fish habitat; 2) offset the effects of works, undertakings or activities; 3) provide additional benefits to the ecosystem, and; 4) generate benefits that are self-sustaining over the long term.	Need for a fish habitat offsetting plan to offset anticipated losses from the mining project.
DFO-09	Fish and fish habitat / Aquatic invasive species	The proponent does not address the risks of the presence of aquatic invasive species in the water bodies included in the project area(s) or the risks related to their introduction.	The proponent must ensure that the data and information collected to identify and locate aquatic invasive species are sufficient in quantity and quality to provide adequate representation in managing the risk of their spread. In addition, it must identify the measures needed to	Need to identify and locate aquatic invasive species and determine the measures required to prevent the introduction of aquatic invasive species into unaffected water bodies.

			prevent their introduction into unaffected water bodies.	
DFO-10	Fish and fish habitat / presence or absence of fish	The proponent indicates in section 14.2.2.1.1 the presence of watercourses with no fish following inventories or with natural obstacles to fish passage and migration. The absence of fish during inventories is not a complete justification for confirming the absence of fish, and the description of natural obstacles must be sufficient for DFO to determine beyond doubt the impossibility of fish using the habitat targeted for watercourse crossing projects. Baseline data acquired in 2011 and 2012 is not sufficient to determine the presence or absence of fish and fish habitat. Baseline data acquired in the 2023 and 2024 field studies is necessary to make these determinations.	The proponent is responsible for characterizing habitats with sufficient information for DFO to determine beyond doubt the absence of fish in the watercourse or the impossibility of fish using the watercourse segment for passage or migration.	The proponent must provide the necessary up to date information to demonstrate the presence/absence of fish in the watercourse or body of water, or the impossibility of fish using the watercourse segment for passage.
DFO-11	Fish and fish habitat / Fish species considered	The IPD places emphasis in certain sections, such as in the studies to be carried out in sections 14.2.2.1 and 14.2.2.2, on certain groups of fish concerning the use of a watercourse or body of water for particular functions (e.g. spawning grounds). However, under the <i>Fisheries Act</i> , updated in 2019, the mortality of any fish and the harmful alteration, destruction or disruption of their habitat are prohibited. Habitat can fulfil many functions for fish, including growth, migration, winter survival and spawning.	In relation to points DFO-01 and DFO-02, the proponent must specify the location and surface areas of potential or confirmed fish habitats, and describe the use that would be made of them by any fish species (spawning, rearing, growth, feeding, migration, shelter, winter survival). Consequently, the proponent will have to determine precisely the anticipated impacts of its project on fish (as defined by the 2019 <i>Fisheries Act</i> ) and fish habitat.	The proponent must take into account all fish species as defined by the <i>Fisheries Act</i> of 2019 in the biological inventories, the characterization of fish habitat and its use, and the identification and impact analysis of the various works/undertakings/activities on fish and fish habitat.
DFO-12	Marine Mammals	The IPD lacks information regarding marine mammals that may be potentially present, and therefore potentially impacted, at both the ports and within the proposed shipping route. The shipping route shown in Map 9-1	Recommend visiting <a href="#">Notices to Mariners 1 to 46 - Annual Edition 2023 (notmar.gc.ca)</a> Section A2 (5) for General Guidelines for Aquatic Species at Risk and Important Marine Mammal Areas. Recommend	The IPD should discuss the marine mammal species and their potential presence at the ports and along the proposed shipping route.



		overlaps with important areas of blue whale feeding, foraging and migration, as well as identified priority areas to enhance monitoring of cetaceans ( <a href="https://www.dfo-mpo.gc.ca/canada-marine-planning-atlas-atlantic">Canada Marine Planning Atlas - Atlantic (dfo-mpo.gc.ca)</a> ).	visiting <a href="https://www.justice.gc.ca/marine-mammal-regulations">Marine Mammal Regulations (justice.gc.ca)</a> under the <i>Fisheries Act</i> .	
DFO-13	Marine Species at Risk (SAR)	The IPD lacks information regarding marine SAR that may be potentially present, and therefore potentially impacted, at both the ports and within the proposed shipping route. The shipping route shown in Map 9-1 overlaps with the following marine SAR: Fin Whale (Atlantic), Blue Whale (Atlantic), Beluga Whale (St. Lawrence Estuary), Spotted Wolffish, Atlantic Wolffish, Northern Wolffish, White Shark (Atlantic), North Atlantic Right Whale, and Leatherback Sea Turtle (Atlantic).	Recommend characterizing marine SAR for port areas and shipping route. Recommend visiting the following: <a href="https://www.dfo-mpo.gc.ca/aquatic-species-at-risk-map">Aquatic species at risk map (dfo-mpo.gc.ca)</a> <a href="#">AC CDC   HOME</a>	The IPD should provide detailed summary of marine SAR and their potential presence at the ports and along the proposed shipping route.
DFO-14	Fisheries	The IPD does not include any information regarding fisheries that have the potential to be impacted due to project-related vessel use at the port facilities and along the proposed shipping route.	Fisheries information should be provided in order to be assessed properly in the cumulative effects assessment.	The IPD should include fisheries information.
DFO-15	Study Area	The IPD does not include a study area for the proposed marine shipping route or for the proposed storage and handling facility at the existing port.  There is uncertainty regarding the proposed location of the access road and whether it is subject to change as Section 9.3.1 states that "Studies are underway to optimize the Road corridor."	Study area should be defined in order to fully identify critical environmental components and sources of potential effects.	The proponent should provide a more detailed description of study area for the project components.
DFO-16	Regulatory reviews	<i>Fisheries Act</i> Authorization is not included in Table 18.1.	If works/undertakings/activities occur in or near water and negative effects on fish habitat cannot be fully avoided or attenuated, the	The proponent should add <i>Fisheries Act</i> Authorization to Table 18.1

			proponent will be required to obtain a <i>Fisheries Act</i> Authorization.	
DFO-17	Fish and fish habitat, species at risk, aquatic invasive species	<p>The IPD lacks a complete description of the works/undertakings/activities associated with the proposed access road. For example, the IPD does not include details regarding the location and use of quarries during construction of the access road, or construction and use of temporary camps along the access road.</p> <p>The IPD lacks sufficient baseline information to identify sensitive fish and fish habitat areas, including species at risk, along the proposed road and implement mitigation measures to avoid or reduce impacts on these areas and/or species.</p> <p>The IPD does not address the risks of the presence of aquatic invasive species in the water bodies along the proposed access road or the risks related to their introduction.</p>	<p>The proponent should provide details on the footprint and construction (i.e. methodologies) of any quarries and temporary camps.</p> <p>The proponent should provide sufficient and up to date baseline information to identify sensitive fish and fish habitat areas (e.g. Atlantic salmon), including species at risk, along the proposed road and propose mitigation measures (e.g. clear span bridges) to avoid or reduce impacts on these areas and/or species.</p> <p>Data and information should be sufficient to identify and locate aquatic invasive species. The proponent should identify the measures needed to prevent their introduction into unaffected water bodies.</p>	The proponent should provide a complete description of project activities, sufficient baseline information to identify sensitive fish and fish habitat areas, species at risk, and aquatic invasive species.
DFO-18	Fishing activity	The IPD does not address how the proponent will manage the potential prosecution of fish through fishing activity by workers during the construction of the access road, in areas which were otherwise undisturbed.	The proponent should identify how fishing activity by construction workers during construction of the access road will be managed in areas that are otherwise unfished and where fish populations are potentially more sensitive.	The IPD should include mitigation measures for management of construction worker fishing activity along the proposed access road.