

Attachment 3



Agence d'évaluation
d'impact du Canada Impact Assessment
Agency of Canada

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Comment Form – Information to Inform the Summary of Issues

Project: Strange Lake Rare Earth Mining Project

Proponent: Torngat Metals Ltd.

CIAR No.: 85969

End of comment period: December 4, 2023

Name of the Community, Nation or Organization: Qiniqtiq Landholding Corporation of Kangiqsualujuaq	
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The Agency invites your community to provide information it has available at this time on the Project and its potential effects or impacts (both positive and negative) to the environment and to your community and your asserted or established Indigenous and/or Treaty Rights. We also welcome your input on how you would like to be engaged throughout the potential federal impact assessment process. Your comments will inform the Summary of Issues¹ with respect to the Project and will be provided to the Proponent to address. You may use this form or use another format of your choice.

This comment form should be submitted via the **Submit a Comment** feature available on the Project's Canadian Impact Assessment Registry page (Reference **85969** at <https://iaac-aeic.gc.ca/050/evaluations/proj/85969?culture=en-CA>). Letters and forms can be uploaded using this feature. If you have any difficulties submitting this way, please contact the Agency at strangelake@iaac-aeic.gc.ca for assistance.

For the purpose of the impact assessment of this project, comments received during this comment period will be shared between the Agency, the Nunatsiavut Government and the Government of Newfoundland and Labrador.

1. Potential environmental effects

Please identify any potential environmental effects of the Project that are of concern to your community, including any that you think of that were not identified in the Initial Project Description.

- Modification of watersheds systems around Project.
- Release of additional sediments in watershed systems affecting spawning sites and fish habitats
- Quantity of Water consumption affecting natural water tables and levels? Consumption during operations, with accommodations, at processing plant? More details needed on the Water Supply section (6.2.1.1)
- Effectiveness of water treatment at mine site and determination of final effluent location (environment vs collecting pond).
- Hydrocarbons, fuel spills responses? (so many spills observed in other projects)
- Content and composition of ore, waste rocks and tailings piles generating potential leakage.

¹ The Summary of Issues is a list of issues raised in the Planning Phase, as per section 14(1) of the *Impact Assessment Act*. This document provides the proponent with an understanding of issues raised by federal authorities, Indigenous Peoples and the public. It also allows participants to see how their comments and concerns have been characterized.


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- Section 7.4 Radionuclides – Management and monitoring of separated radionuclides? Radon gas release during mining operations? What are levels of radioactivity emissions during operations?
- Permafrost mitigation measures considered when construction phase? Impacts evaluation on permafrost thawing on watersheds and fluvial geomorphology.
- Dust emissions abatement measures foreseen ? During blasting, mining, transportation (plane, trucks) operations. Potential impacts on moss, lichens and ultimately food chain.
- Adequate filtration/treatment of mine water effluents
- Modification of fauna species migratory paths
- Community environmental monitoring working groups? How will the company involve them?
- What is the Torngat Env. Management program?

2. Potential effects to physical and cultural heritage

Please describe how the change, resulting from the project potential effects to the environment, could result in changes to your community's physical and cultural heritage (e.g. ceremonial sites, burial sites, cultural landscapes).

- Modification of historical camp sites locations & access;
- Modification of ancestral/historical travel routes. To be validated with Kangiqsualujjuaq Land Use Study map.
- Modification of landscape. Adequate remediation plan?

3. Potential effects to current use of lands and resources for traditional purposes

Please describe how any change, resulting from a project potential effect to the environment, could result in changes to your community's current use of lands and resources for traditional purposes (e.g. hunting, fishing, trapping).

Potential impacts on subsistence harvesting activities:

- On arctic char/salmon/fish habitats, migration and stocks resulting in potential displacement of fishing locations and harvesting.
- Idem for caribou harvesting.
- Change on seasonal land use trails and travel routes.
- Modification of subsistence economy.

These items are to be validated with a comprehensive 'Kangiqsualujjuaq Land Use and Occupancy Study map' that will be considered and integrated to an eventual Environmental & Social Impacts Assessment.



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4. Potential effects to structures, sites or things of historical, archaeological, paleontological or architectural significance.

Please add any further detail, and please describe how the change, resulting from a project potential effect to the environment, could result in changes to your community's structures, sites or things of historical, archaeological, paleontological or architectural significance (e.g. artifacts, important historic buildings or symbols).

As above, historical sites and sites of interest are to be confirmed with a comprehensive 'Kangihsualujuaq Land Use and Occupancy Study map' and that will be considered and integrated to an eventual Environmental & Social Impacts Assessment.

5a. Potential effects to social conditions

Please describe how the Project could potentially affect social conditions that are important to your community.

- Improving local socio-economic development conditions.
- Diversification of economic activities impacting traditional activities.
- "Fly-in/fly-out" working schedules creating adverse impacts on concerned families.
- Tensions between different stakeholders and concerned groups.
- Transfer of local community employment to Project.
- Economic, financial benefits influx into community leading to over-consumption of goods and materials generating issues with disposal management.
- Consideration of community projects development.
- Triggering a of Community socio-development assessment and planning.

5b. Potential effects to health conditions

Please describe how the Project could potentially affect health conditions that are important to your community.

- Project may result in fish/water disturbance that could have effects on traditional food and human health by bioaccumulation in the food chain.
- Extraction impacts (dust, waste rocks leakage, storage/management/and release (?) of radioactive materials in environment) generating health and safety issues.
- Psychosocial effects already produced, community perceptions, expectations and concerns. Is the Company to address these impacts with mitigation measures? To develop adapted and appropriate social/health monitoring programs?
- Proper site remediation plan to be provided and share including safety measures and monitoring.



5c. Potential effects to economic conditions

Please describe how the Project could potentially affect economic conditions that are important to your community.

- Project will eventually bring increased employment opportunities and wages;
- Creation of diversified training programs in various mining project key sector;
- Financial allocations provided in Project Agreement.
- Trainings and technical knowledge acquisition may benefit to community development, not only to mining development but other sectors.
- Economic growth may result to impacts on existing subsistence economy.
- Economic development planning required to identify coherent entrepreneurship, business development opportunities benefiting the community.

6. Potential impact to exercise of asserted or established rights

Please describe if you expect the Project may impact your community's exercise of asserted or established rights, please describe how.

Qiniqtiq LHC will support Makivvik and Nunavik Inuit to make sure the JBNQA provisions, Nunavik Inuit rights and interests are respected and protected during the consultation exercise, the Project planning and development. No project development nor other agreement, ex.: NEQA, or other interest zones should supersede JBNQA provisions.

7-8. Consultation and Engagement

Assuming a federal impact assessment is required for the Project, please provide information on the how you would like to be consulted by the Agency.

Avoid any consultation duplication processes that could increase community "fatigue" and administrative stress and expenses. Different Impact Assessment Review agencies must harmonize processes to facilitate community participation, project awareness and understanding, and communications.

****Initial Project Description mentions that "most of these impacts would be felt by the Indigenous groups: the Nunavik Inuit (mainly from the communities of Kangiqsualujuaq and Kuujuaq)".** Community of Kangiqsualujuaq is identified to be the most impacted due to its geographical location in the George River watershed. Makivvik as representative of the whole Nunavik region will participate to the consultation process on behalf other communities including Kuujuaq.

Assuming a federal impact assessment is required for the Project, please provide information on the how you would like the proponent to consult your community.



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Project proponent already in contact with Kangiqsualujjuaq community and Nunavik regional organizations and already planning to establish a local liaison committee that will engage in solutions-focused dialogue and transparent communication about the Strange Lake Project. This includes discussing priorities and issues related to information and communication materials, project design, technical and environmental work programs, environmental protection, social cohesion, community development, economic opportunities (training, jobs and business), and other topics raised by the local liaison committee members.

9. Additional considerations under the federal impact assessment process

Are there any additional issues, such as issues considered under the federal impact assessment process (i.e. gender based analysis, sustainability, or Indigenous cultures) that you wish to note for the Agency's consideration?²

The local Liaison Committee will consider Equity, Diversity and Inclusion (EDI) practices related to the Strange Lake project to increase economic participation of all Inuit community members.

Please provide this form and any other comments you wish to provide to the Agency on the Summary of the Initial Project Description using the **Submit a Comment** button on the Canadian Impact Assessment Registry **by December 4, 2023**. Thank you.

² The text of the *Impact Assessment Act* is available online: <https://www.parl.ca/DocumentViewer/en/42-1/bill/C-69/royal-assent>