

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: Makivik Corporation	
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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.

<p>Modification of features of identified watersheds around the Project, including from water and dust rejections of trace metals, radioactive and acidic residues, and other chemical substances. These could negatively impact the health of aquatic and terrestrial wildlife with potential population level effects.</p> <p>Release of additional sediments in watershed systems which can alter the physical, chemical, and biological composition of the watershed with subsequent impacts for the aquatic life inhabiting it.</p> <p>(Most of the first comments on potential impacts are identified in the Initial Project Description document).</p> <p>Impacts from permafrost thaw on above-mentioned rejections from the Projects, and vice-versa, i.e., impact of Project on permafrost thaw.</p>
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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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Increased habitat fragmentation caused by the construction of new infrastructure (e.g., roads, airstrip, camps) with significant negative implications for aquatic and terrestrial wildlife populations (ex. Fragmentation of fish spawning and caribou calving grounds).

Potential impacts of contamination or projection of dust on vegetation in the surroundings of the Project.

Unknow effects of contaminated vegetation with trace metals or dust deposit for caribou foraging.

Potential destruction of high-quality habitat for the caribou and the fragmentation of some of it's crucial habitat.

Exposition to noise from mining activities or aircraft can generate additional stress to wildlife. This can have direct impact on their survival, caribou calf being particularly at risk. Possible collisions between vehicles and caribou as the proposed road is crossing the caribou range.

Environmental disruption on a large scale, resulting from the amount of land needed to be mined to accumulate sufficient quantities of ore containing rare earth elements.

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).

Alteration of historical camp sites location & access; alteration of ancestral/historical travel routes. Existing data, such as the Kangiqsualujuaq Land Use Study can be use to better understand the potential impacts on physical and cultural heritage but there's a need to collect more information and Inuit knowledge on this specific area.

The potential environmental effects identified in question one can have significant negative impacts for aquatic and terrestrial wildlife, which are of significant cultural and subsistence importance to Kangiqsualujuaqmiut and Nunavimmiut.

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).

Impacts on subsistence harvesting activities:

- 1- Potential impacts on Fish habitats, spawning, migration, that could result in permanent or temporary habitat lost, displacement of fishing locations and health. All these impacts can affect harvesting of Nunavik Inuit (catches);
- 2- idem for caribou harvesting. Habitat fragmentation leading to potential impacts on caribou migration routes and therefore on the harvesting activities of Nunavik Inuit. Potential impacts on the calving grounds which can impact caribou behaviour and survival. As the George River herd is in a critical condition, any disturbance with a negative impact on recruitment rate put at risk the recovery of the herd. If the herd does not recover, traditional activities, practices and knowledge essential to Inuit lifestyle could be severely impacted.
- 3- Change on seasonal land use trails and travel routes
- 4- Having installations and a road could lead to an acceleration of development (mining, camps or infrastructures) in the region. This could generate cumulative impacts and disturbances to harvesting activities and community use of land.



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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).

An archaeological assessment will be required as per the above comment. Further land use study is needed in the area to fully understand past and current use of the site that could be impacted by this proposed project.

Previous archaeological surveying in the Lake Brisson area identified a site that would need further investigation and noted that the new proposed mine configuration will require a new archaeological impact assessment to make sure there are no sites in the additional areas that could potentially be impacted by the project

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 economical activities impacting traditional activities. "Fly-in/fly-out" working schedules creating adverse impacts on concerned families. Tensions between different stakeholders and concerned groups; Potential impact on local community employment due to transfer to the Project; Economic, financial benefits influx into community leading to a potential increased consumption of goods and materials generating an increased need for, and potential issues with , disposal management. Potential disharmony, confrontation and conflicts between community members who are for or against the Project.

5b. Potential effects to health conditions

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

The Project may result in water/land/air disturbance that could have effects on traditional food (aquatic and terrestrial) and human health (mental and physical); Extraction impacts (dust, waste rocks leakage, storage/management/and release of trace metals and acidic and radioactive materials and other chemical substances into the environment) generating health (mental and physical) and safety issues. Very limited scientific knowledge is available detailing the impact of rare earth elements on its chemical behavior in the environment and its subsequent implications for animal and human health. The project can potentially increase stress, anxiety and emotional distress among community members affected by the Project impacts, whether during the planning phase (e.g., over consultation leading to fatigue, stress or an overwhelming feeling) or operational phase (e.g., increased stress and anxiety linked to the Inuit's capacity to



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harvest safe traditional food, increased anxiety related to the Project's impacts on the George River caribou herd population which is already really concerning for Nunavik Inuit).

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; 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.
Potential negative effects on ecotourism and outfitting activities due to impacts of the Project on the environment and wildlife.
Potential impacts on wildlife abundance and health could lead to a diminution of country food available. This would subsequently decrease food security in 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.

Impact on Inuit hunting, fishing and trapping rights.
Makivvik and Nunavik Inuit will make sure the JBNQA provisions, Nunavik Inuit rights and interest are respected and protected during the consultation exercise and/or the Project planning and development, as per the constitutional protection that they benefit from. No other agreement, ex.: NEQA, or other interest zones should affect the rights, privileges and benefits of Nunavik Inuit under the James Bay and Northern Québec Agreement.

The consultation, involvement and support (logistical, financial, etc) offered to Nunavimmiut by the proponents and review bodies throughout the Project should reflect the importance of these protected rights.

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.

The proponent was under the impression that Kuujjuaq will be impacted at the same level as Kangiqsualujuaq, and therefore requires the same consultation approach. That said, Kuujjuaq is not as directly impacted by the project since it is not part of the same watershed. Therefore, while there is a need for the proponent to consult Kangiqsualujuaq directly, it is recommended that the proponent works with Makivvik to determine the best consultation approach for the other Nunavik communities.

Makivvik is interested in receiving the \$25,000 grant available for Part 2 of the planning phase for participating in the development of the Tailored Impact Statement Guidelines and the Consultation Plan.



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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.

It is Makivvik's understanding that the proponent already engaged with Community and Regional organizations and is planning to establish a local community committee that will engage in solutions-focused dialogue and transparent communication about the Strange Lake Project. This would include 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 committee members. Makivvik supports such proposed approach from the proponent.

In addition to the above, Makivvik should be engaged on a regular basis (frequency to be determined with the proponent) to receive information and updates on the Project in a manner and format to be determined by Makivvik (e.g., information structured around thematic issues rather than around technically defined impacts).

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

Makivvik expects the proposed local community committee to consider Equity, Diversity and Inclusion (EDI) practices related to the Strange Lake project to increase economic participation of Inuit communities.

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>