



# Naskapi Nation of Nation Naskapi de KAWAWACHIKAMACH

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## BY EMAIL

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December 6, 2023

### Subject: Strange Lake Rare Earth Mining Project – Project Description and Registration

Dear Ms Gill and Ms Sweeney,

As you are aware, the Naskapi Nation of Kawawachikamach (“Nation”) received a consultation request on October 6, 2023, pertaining to the project entitled Strange Lake Rare Earth Mining Project (“Project”) submitted by Torngat Metals (“Proponent”) and AECOM. The following information (“Documentation”) was supplied by the Impact Assessment Agency of Canada (“IAAC”) and the Government of Newfoundland and Labrador (“GNL”):

- *Letter dated October 6, 2023, entitled “Opportunity to comment on the potential impact assessment of the Strange Lake Rare Earth Mining Project”;*
- *Map of Project Components;*
- *Strange Lake Rare Earth Mining Project - Initial Project Description and Registration Document, dated September 2023.*

Consequently, we understand that:

1. All the Documentation enabling the Nation to make an informed decision has effectively been communicated within a reasonable time frame;
2. The final Project shall be substantially as described in the Documentation.

As you are also aware, the Project is located near the George River and in the area of the calving and post-calving grounds of the George River caribou herd. Given the herd is in such a precarious state, the Nation is concerned that there will be extremely significant direct and indirect impacts on the herd and its habitat. Furthermore, a significant amount of work needs to be done by the Proponent to adequately describe every component of the Project, including, but not limited to,



potential impacts, proposed mitigation measures, alternatives for the Project and rehabilitation efforts, prior to the Project moving forward.

Subject to the foregoing, the Nation's detailed comments pertaining to the Project Documentation are attached hereto in **Appendix 1** and the Nation strongly insists the IAAC and the GNL subject the Project to its full Impact Assessment process.

Such position is also subject to the following terms and conditions:

1. No substantial modifications shall be brought to the Project, as described in the Documentation, without undertaking additional consultation with the Nation;
2. Any modification that affects our Aboriginal and treaty rights in Quebec and Labrador, shall be submitted to a new and distinct consultation process;
3. The position adopted by the Nation is entirely based upon the Documentation and may be modified where any other relevant issues are brought to the attention of our representatives;
4. Such position does not amount to consent to any future activities and shall not affect the Aboriginal and treaty rights of the Nation.

The Nation looks forward to continuing to develop, with the Proponent, the IAAC and the GNL, a mutually beneficial relationship based on trust, transparency, and open communication.

Should you require any additional information, please do not hesitate to contact myself at <email address removed> or Ms Lindsay Richardson at <email address removed> or <personal information removed>

Best Regards,  
<Original signed by>

David Swappie  
Councillor, Environment Portfolio  
Naskapi Nation of Kawawachikamach

c.c. (by email)

Chief Theresa Chemaganish and Council members of the Naskapi Nation of Kawawachikamach  
Ms Stella Pien, Director General, Naskapi Nation of Kawawachikamach  
Mr Michel Bacon, Mining Liaison Officer, Naskapi Nation of Kawawachikamach  
Mr Billy Shecanapish, Environment Coordinator, Naskapi Nation of Kawawachikamach  
Ms Lindsay Richardson, Project Coordinator (Environment), Atmacinta  
Ms Aude Therrien, Impact Assessment Agency of Canada  
Ms Brenda Rowe, Government of Newfoundland and Labrador  
Ms Jennifer Barnes, Government of Newfoundland and Labrador

## **APPENDIX 1**

### **1.0 CONTEXT**

Tornгат Metals Ltd. (“Proponent”), formerly Quest Rare Minerals Ltd, proposes to develop a rare earth minerals mine in northeastern Quebec approximately 235 kilometers from the Naskapi community of Kawawachikamach, for a duration of 30 years. The ore would be extracted via an open pit mine, processed and separated through a beneficiation plant and then shipped by truck on a newly constructed road approximately 160 kilometers in length east towards Voisey’s Bay near Nain, after which it will be shipped by boat to Sept-Iles to be further refined (the “Project”).

The proposed Project will have significant direct and indirect impacts on the Nation given the location of the proposed mine being within the calving and post-calving grounds of the George River caribou herd, in the heart of the important habitat identified by Naskapi Elders and land users and near the George River. Naskapis indeed still use this land to practice their traditional activities, although they tend to avoid the area during summertime to respect the caribou, and in hopes that the young survive and repopulate the diminishing herd.

The document under review is the Impact Assessment Initial Project Description (“IPD”) and Registration Document and the main objective of this review and comment by the Naskapi Nation of Kawawachikamach (“Nation”) is to verify the quality of the content and proposed methods and operations. The Nation does not support the level of detail presented in this IPD as it does not fully describe all the potential impacts of the Project, it does not describe sufficient mitigation measures, and the Nation believes it should be subjected to more thorough and intensive scrutiny and review. A full Impact Assessment is indeed necessary and much more information, analysis, discussions and full understanding of the proposed Project is necessary.

### **2.0 REVIEW AND COMMENTS**

Although the Proponent is, for the most part, correct in that “...the overall concerns expressed by most communities being: the preservation of the water quality of the George River and its tributaries; the protection of caribou and valued species that are part of the diet of the populations; economic benefits that promote sustainable development of the communities concerned; access to relevant information related to the Project; and effective participation of communities in the development of the Project” (page 49), the Nation believes that this IPD is incomplete and that the Project will have significant impacts and should not be considered acceptable quality since the Proponent has excluded a substantial amount of information, those of major concern to the Nation being outlined below.

#### **Aboriginal Rights and Treaty Rights:**

The Nation is a signatory to the *Northeastern Quebec Agreement*, (“NEQA”), a modern treaty, executed in 1978, and its members hold treaty rights on the Territory contemplated by the NEQA

in Northeastern Québec. The Naskapi also hold Aboriginal rights and title on the portion of their traditional territory located in Quebec and Labrador.

Therefore, the Nation's Aboriginal rights, including title and treaty rights must be taken into account and given effect by governments and proponents alike. Furthermore, proposed Project activities, including the road in Labrador may have adverse effects on the NEQA territory, as well as on the Naskapi traditional territory, both in Québec and in Labrador.

The Proponent acknowledges that this Project will cause “disturbance of the peace and quietness of the site for them, as well as a potential deterioration in the practice of certain activities such as hunting” (page 92). Furthermore, the Proponent claims that “It is also possible that Indigenous groups may reduce or even stop practicing certain traditional activities because of fears of resource contamination” (page 92). Naskapis use this area and are concerned as to how the Project will affect its traditional activities surrounding the mine site and the road. The Nation believes that more details regarding the Project, its potential impacts, and more targeted mitigation measures should be presented by the Proponent and discussed in depth with the Nation and its community members. The Project is located in a pristine environment that will be significantly and permanently disturbed, whilst directly and indirectly impacting the local Native communities, therefore more details, prevention strategies, strategic planning measures, continuous monitoring procedures, enforcement and follow up are all required to enhance this Project.

The Proponent notes that “acceptance of the project by the Indigenous and non-Indigenous communities directly affected will be particularly important, both in northern and Sept-Iles areas.” (page 81). The Nation fully respects this statement and believes it can engage in meaningful discussions with the Proponent if they truly accept that social acceptability is a necessary and a crucial part of project development. The Nation believes that the only way for any project to move forward is open and honest communication whilst ensuring continuous engagement and discussions.

### **Traditional Knowledge**

“Landscape studies were conducted in 2012-2013...the study also indicated that this landscape was infrequently used and therefore considered to have moderate intrinsic value for both Indigenous and non-Indigenous users.” (page 74). What evidence or information does the Proponent have to state that there is moderate intrinsic value to this area for the Naskapis? If the Proponent is going to make such a statement, it requires evidence as to how they came to this conclusion as it can be misleading. Efforts should be made by the Proponent to use Traditional Aboriginal Knowledge, considering the Naskapis have hunted and fished in the Project's proposed footprint for centuries. Furthermore, the methodology used, and respect of knowledge ownership should be clearly defined.

“For the 2023-2024 biophysical workplans, governmental departments of Quebec, Federal, NG, and NL have been and will be contacted in order to assemble proper information on best timing for fieldwork assessments and inventories...” (page 55). Indigenous Nations should also be consulted on this type of information given their knowledge of the area, the environment, the wildlife etc.

### **Human Health**

“A comprehensive study on human health, on quality of life and psychosocial impacts will be conducted as part of the current project.” (page 73) This is interesting, but the Proponent should include more information concerning when and how this will be undertaken.

“The human health and quality of life of communities residing or active in the study areas of the various project components could be affected by the implementation of the different phases of the project, in particular with regard to: Risks associated with the potential release of contaminants (metals, radioactive elements) into air, water or soil, and their movement through the ecosystem and food chain...More specifically, a rare earth mining project raises issues of toxicity and radioactivity of the contaminants generated by the different phases of the project...in the north, specific concerns relate to the consequences of mining activities on the quality of water, air, soil, or plants and eventually on the traditional diet of these populations (berries, caribou, fish)” (page 79). “**The radionuclides** naturally found in the Strange Lake deposit are **Thorium and Uranium**” (page 40). This will have significant impacts if they are released into the air or water, they will surely be absorbed by the vegetation or into the water, and the animals that consume the plants or live in the water will be ingested by humans. The risk of radioactive elements leaching into the environment is a major concern and the Nation requires much more information, intense analysis, review, discussions and prevention measures will need to be very clear, prior to the Project moving forward.

### **Biological Environment**

“At the time of writing this document (August 2023), engagement activities and data acquisition have started for wildlife...and more surveys will be conducted in 2023-2024 for other components” (page 55). The Nation would like to know what the other activities, components and surveys might be and when will they occur?

“The protection of biodiversity therefore concerns: protection and preservation of the territory’s wildlife and flora resources valued by stakeholders, in particular by the Indigenous groups concerned (notably caribou, Arctic char, etc.)” (page 80) The Nation is pleased to see the Proponent recognize this in the IPD.

### **Caribou**

Caribou are of significant importance to Naskapis and the potential impacts of this Project on caribou needs to be presented and examined in great depth. Caribou have always been the primary resource harvested by Naskapis and both migratory and woodland caribou are of extreme importance to the Nation. If caribou cannot be found in the Kawawachikamach region, the Naskapis have been known to seek out caribou within their traditional hunting grounds (including the Project area). Caribou and their calves migrate directly in the Project area, therefore, protocols need to be put in place to monitor the caribou using the already available telemetric data, and the Proponent needs to consider ceasing operations during certain months, and certain periods of the year (as proposed by the Nation from May 15<sup>th</sup> to August 1<sup>st</sup>).

The migratory patterns of caribou do not remain static, and the Naskapis have traditionally moved with the herd throughout its annual range. The George River herd, unfortunately, is experiencing the biggest population crash ever registered, and their distribution has moved and decreased

considerably. On page 68 the Proponent notes that the caribou had "...a record low in 1956...However, the population has been experiencing a rapid decline in recent years (Bergerud et al (2008))." This is quoted from the year 2008, but 15 years later, the population is still declining! The entire section on caribou has been written with outdated figures. Updated information needs to be presented in the IPD so as to present the existing current situation.

Furthermore, the Proponent proclaims that "Caribou are an important issue given the value of this animal to Indigenous and non-Indigenous people in Quebec and Newfoundland and Labrador, and the recent decline in the George River migratory herd population (from 74,000 in 2010 to 14,200 in 2014). Regardless, this population does not have legal conservation status." (page 69). Firstly, why is the Proponent using such old data when they have access to more accurate information. This leads the Nation to believe that old information was recycled and this IPD was rushed and not verified. Secondly, regardless of their legal status, they are of extreme importance to the local communities and their population is in jeopardy. The Nation would appreciate an explanation from the Proponent as to what it means by that last sentence. The Committee on the Status of Endangered Wildlife in Canada has classified the George River caribou herd as "Endangered", and it will soon be listed on the federal Species at Risk Act. This should be noted and considered in this section. The Proponent itself states "A study on land use and traditional ecological knowledge (TEK) was conducted between 2012 and 2013...Naskapi users from Quebec and Labrador Innu users visited the mining site area for activities such as winter caribou hunting and spring waterfowl hunting....**All Indigenous groups** encountered at the time...also expressed concerns about the effect of the project (essentially the mining site and the road) on **caribou**" (page 71).

Other than ongoing monitoring, voluntary bans on hunting by Indigenous groups and the closure of the sport hunt in Quebec and Labrador, there have been few other meaningful conservation actions to protect the George River herd. Progress towards the conservation and protection of the herd is needed and collaborative efforts must be sought. When the Proponent mentions the Caribou Working Group that was established in collaboration with the Nation, it notes that "The purpose of those meetings is to review together the methodology of the different field work happening on the territory and to put in place mechanisms to avoid impacting the herd of George River caribous during those activities" (page 50). Yet it is also very important to include that the proposed mine is located in the traditional caribou calving and post-calving zone, as designated by Naskapi Elders and hunters. The Nation has major concerns for the caribou not only to protect the herd but also to ensure the newborns have the best chance at survival, given the current state of the herd's declining population. The caribou is a keystone species in Naskapi culture and history and the Nation would appreciate more detailed information and explanations in this section.

Concerning the incidental observations of caribou, the Proponent notes that "the link is sent to all communities" (page 50). The Nation believes that, in order to protect the herd, this map should be reserved only for the established caribou working groups and should not be a shared public document.

Moreover, roads are known to create access to favorable habitats for moose and the presence of moose (as alternative prey phenomenon) can be detrimental to the caribou. The Nation would appreciate more information concerning the potential impacts of the Project on moose.

Finally, page 11 states that "the timing is ideal", but with regards to the George River caribou herd this is the worst timing. This Project may gain social acceptability if the Proponent is willing to

realize it when the herd will be at a level that will ensure a certain resilience to the impacts of the Project.

Overall, the sections presented on wildlife and specifically caribou, are uninspiring, much too vague, sampling methodology is missing, no maps are presented and providing outdated information is simply disappointing; the Nation believes that additional work is necessary.

### **Birds**

With regards to avian fauna, the Proponent notes that “Additional surveys are to be carried out in 2023 and 2024” (page 66). The Nation would like to know what other surveys they will be doing in 2023 and 2024? Furthermore, what kind of survey and when will it occur?

### **Species at Risk**

The Nation was surprised that the Proponent presented “the conservation status for sensitive species observed during the 2011, 2012 and 2013 surveys...” (page 68), but there is no mention of providing updates upon reviewing the most current species at risk, threatened or endangered.

### **Water and Air Pollutants:**

The Nation is concerned that the airborne emissions and water pollutants will contaminate the habitats and environments of wildlife, therefore, the Proponent needs to commit to concrete avoidance and mitigation measures.

#### *Air Quality:*

Air quality, dust suppression and the impacts on the surrounding environment and human health was not addressed adequately in the IPD and should be outlined in much greater detail. There will be many logistical questions pertaining to dust suppression along the haul road alone. (For example: where will this water be sourced? What will be the schedule of this dust suppression? How many trucks will be circulating and how frequently? Will they have vehicle cleaning stations? Do they plan to have water or chemical based dust suppressant?) Mitigation measures for fugitive dust, radioactive elements, metals and all potential airborne emissions and contaminants need to be strong and better explained by the Proponent.

#### *Water Quality:*

Water quality is a major concern for the Nation, and this is a component of the Project whereby the Nation would like to see and understand more detailed information. Water runoff could easily bring contaminated water, oil and waste into the surrounding water bodies and the local environment; therefore, the Nation needs more reassurance as to how the water management plan will be implemented, monitored, and strategically managed to avoid mistakes, mishaps, or accidents. Prevention should be at the heart of planning. When analyzing the impacts on water resources, the Proponent must consider all potential downstream effects since “The primary hydrographic basin is that of the George River, which is located 100km downstream of the mine site considering the waterflow (the George River is approximately 30 kms due West of the mine site)” (page 23). Furthermore, the George River is not only a habitat to some keystone species of fish, but it also was historically a fundamental travel route for Naskapis and they therefore have a significant amount of cultural ties, burial grounds, archaeological artifacts all along the George River and its shorelines.

The Proponent explains that “Approximately 80% of the mine site’s area drains towards Lake Brisson, which waters, after flowing through Lake Napeu Kainiut, discharge into the Deat River watershed and ultimately leads to the George River (approximately 100km downstream)” (page 58), therefore the Nation needs to be assured that all scenarios have been considered, proper mitigation measures are in place and emergency measures are outlined.

Finally, the Nation would like to understand the risks associated with the potential contaminants to fish and what the Proponent will implement to monitor fish health.

### **Waste Management**

The Nation believes that there are a lot of unanswered questions concerning the Proponent’s waste management plan and waste piles. Will they have a local landfill and where will it be located? Hazardous waste will be transported “...off-site to an approved disposal facility” (page 97), but where will this be and how will it be transported off-site (by air)?

“The revised Strange Lake Project includes a physical concentration step at the mine site, which considerably reduce the amount of material to be transported to the process plant. This decrease will result in approximately 125,000 to 350,000 tonnes per year of ore concentrate to be shipped from the mine, compared to approximately 1,500,000 tonnes in the previous version...” (page 13). This is good for ore transportation, (road and ship transportation), but where will this waste rock be stored? What potential impacts will these waste piles have?

“The beneficiation plant will be fed with high grade ore for the first 18 years at a rate of between 2.5 and 3.0 million tonnes per year. For the remaining 12 years, the mill will be fed with lower grade stockpiled ore at a rate of 5.0 to 7.0 million tonnes per year...The separation processes that will be used in the beneficiation plant are currently being optimized. The dry residues will be stockpiled in the waste rock storage area. The ore concentration processes, generated in a wet environment are thickened and filtered before being transported to the mine residue stockpile area.” (page 39) The Nation would like to know what the thickener will be and where will the waste/tailings be located?

Finally, page 30 notes that “An area will also be set up to carry out the bioremediation of contaminated soil and snow”, but there are no specifics regarding where, when and how this will be done?

### **Road**

The Nation would like more information concerning the construction, use, and maintenance of the proposed 160km road. The details concerning this road are very unclear in the IPD. There is vague information about when and how the road is proposed to be used, for shipping out and shipping in. This road will disrupt ecosystems, fragment habitats, cross water bodies and open the land to people, and other animals, therefore a significant amount of additional information is required, on the use, traffic, maintenance, safety measures and monitoring of the road. The Proponent states “Although mining activities would occur from 9 to 12 months annually, the road transportation of mining materials would rather be seasonal, for an estimated period of 8 to 9 months outside of the warmer



months (approximately June to August).” This seems slightly deceiving to the Nation, since it will also be used for “...incoming supplies such as food, chemicals used in the flotation process and in the water treatment, consumables used for machinery and facility maintenance, material, equipment and outgoing waste, other excess materials and any equipment no longer in use” (page 32). The Nation requires more information pertaining to the use and the frequency of the road. A monthly breakdown of the number of trips and the type of freight expected would be useful.

Additionally, “The road corridor passes through three ecological Land Regions and vegetation types vary from one to another” (page 62). The Nation would like to therefore understand what the Proponent will change to adapt to the different Land Regions. (Will they use different material to build the road? Different machinery?).

### **Climate Change**

The Proponent claims “its environmental follow-up/monitoring and restoration programs will be developed in such a way as to aim for carbon neutrality by 2050, all with a view to sustainable development.” (page 10). Furthermore, “The main sources of atmospheric emission (greenhouse gases, particles, etc.) will be generated by mining, blasting, crushing, concentrate storage, stockpiles, electricity production (generators) as well as vehicles traffic for the transportation of ore, concentrate and other transportation activities on the site” (page 25). The Nation would love to see this detailed plan to achieve net-zero emissions by 2050, but notes that it should also include the destruction of greenhouse gas sinks and stores (for example the removal of wetlands and permafrost).

### **Rehabilitation and Closure**

Given this is a remote pristine area the Nation supports the idea of progressive rehabilitation efforts but notes that with the harsh environment and short growing season, this is something that needs to be well planned and researched. What native plants and seeds will be used? How will they be dispersed? How will this be monitored? The Nation strongly believes that proper rehabilitation efforts must be practiced by all proponents and strongly enforced by all government authorities. The environment must be restored with an aim to attain a natural landscape continuous with surrounding landscapes and encourage the repopulation of a flourishing ecosystem. This phase is indeed mentioned in the IPD but since this is an essential part of the Project it needs to be better analyzed in an Impact Statement.

### **General Comments**

The Nation has a few additional comments which demonstrate that this IPD is insufficient, and lacks detail:

#### *Fueling:*

There was not much information pertaining to a designated fueling station on site. This should be clear and planned from the beginning of the Project to avoid any unnecessary spills, or accidents. When any big projects are developed, spills are bound to happen, it is the prevention measures, and response measures that need to be clear and well-structured to ensure the least damaging outcome. Has the Proponent considered alternatives?

*Archaeology:*

“Three concentrations of anthropogenic quartz flakes and a concentration of burned bone fragments were also found...Another site with several stone flakes was discovered near Lake Brisson...These two sites were not dated” (page 79). The Nation wonders why they were not dated? Further archaeological work is necessary in the area and the Nation would like to know the Proponents plan for such work.

*Alternatives:*

The Proponent fails to mention realistic Project alternatives (road, route of the road, ice road only, etc.) and it would be valuable to have a comparison table and discussion of alternative options for the Project.

The Proponent states that “In order to diminish the dependance to diesel and reduce the carbon footprint of the project, wind turbines, or in combination with other renewable energy, might be constructed at the Mine Site under the responsibility of third parties” (page 36). The Nation believes that a full assessment of this proposal should be included in the Project Impact Assessment to obtain a full and clear picture of the Project, the mine site and the potential impacts.

Page 43 notes that “the current targeted mining plan significantly reduced (10 fold) the environmental footprint from the previous pre-feasibility study”. An explanation as to what specifically was done to significantly reduce the environmental footprint should be included.

*Misinformation:*

“As part of the Strange Lake Project, Torngat Metals has presented the Project to various government stakeholders at the federal and provincial (Quebec and Newfoundland and Labrador) levels and to Indigenous governments (Nunavik and Nunatsiavut) since 2011” (page 45). The Nation would like to point out this should read Kativik Regional Government, since there is no Nunavik government.

On page 51, Table 11-1, the Proponent claims that in 2023 they met with “Elders, land users and community members of Kawawachikamach (through a public meeting)” The Nation believes that this is false information and/or would like to know what they are referring to?

Furthermore, Table 11-1 also lists the comments of the Nation and failed to include all of the Nation’s concerns which include much more than what is listed, as mentioned in the above text of this Appendix.

*IDP Document:*

The IPD needs more visuals, such as maps, throughout the document. This would have presented more clarity and understanding for the Nation.

The mine site and road should have been clearly separated from the Sept Iles processing plant in the IPD. This would make for a better organized, and easy to follow document.

Additional studies and information are required, for example, the section presenting amphibians and reptiles (page 66), seems to simply state that none were found. The Proponent should explain why, what type of survey was done and if they were specifically looking for them or not.

Finally, the Nation believes it would be beneficial to understand how the mining plan would be affected if the life of mine was extended (the location and size of waste piles, tailings, use of pit, etc.).

### ***3.0 CONCLUSION***

The Nation must consider that the Project will certainly have impacts during its mine life but may also have long lasting impacts on the environment and on future generations, and particularly the George River caribou herd and the George River. This is a Project with potentially huge impacts therefore all environmental and human impacts need to be detailed and well-planned with strong mitigation measures. “The development of the Strange Lake Project could potentially lead to changes associated with land and resources use” (page 71) and “All Indigenous groups encountered shared common values related to the preservation of natural habitats and traditional harvesting activities” (page 72).

Given the Naskapis’ Aboriginal and treaty rights on the site of the Project and given the potentially huge impacts of the Project on the Naskapis’ rights, interests and way of life, the strongest level of consultation and accommodation is required. The Nation is thus expecting the highest level of engagement with the Government authorities and with the Proponent.

The Nation believes that the IPD in general, is much too vague and disorganized as a document, (for example, Table 15-3 presenting impacts and mitigation measures only for Migratory Birds and Fish seemed out of place and peculiar when the other project components weren’t addressed). The Nation is therefore not satisfied with the content and quality of the work presented in this IPD. It lacks a significant amount of information, including but not limited to; radioactive elements, pollution and waste management, species at risk, water and air emissions (including cumulative impacts), caribou conservation, and the rehabilitation and closure planning. The Nation believes that this IPD document needs to be strengthened and a full Impact Assessment process would be beneficial for this Project, the Proponent, and the Nation.