Comments on the Strange Lake Rare Earth Mining Project - IPD

You will find below comments from the Nunatsiavut Government regarding the proposed Strange Lake mine. Overall, this project is one of the most ambitious industrial developments to ever be considered in Northern Labrador, and the risk of significant and irreversible harm to the environment and Labrador Inuit it poses are substantial. In this context, there is no place for uncertainty, and the level of standards to which the proponent's evaluation of potential impacts and its selection of mitigation measures are being held to must be proportionate to these risks.

Potential impacts

As stated above, described by the proponent in the project description and commented on extensively by Nunatsiavut beneficiaries, the project has the potential to have significant negative impacts. While the list is extensive, we singled out two categories of potential impacts here, amongst the especially concerning: impacts on the George River caribou herd and impacts to waterways and fish. This should not, however, be interpreted as saying that the other potential impacts are less significant or worrisome, as comments from beneficiaries on issues such as radiation safety, developments in Edward's Cove or impacts on the marine environment can demonstrate.

In terms of caribou, the road is a significant concern. It would indeed cross the entirety of the habitat on the Labrador side of the border, and despite its potentially small width and limits on use, linear disturbances are a specific concern for impacts on caribou. Mitigation measures listed in the IPD are few considering the potential impacts, and do not reference studies or reviews to support their selection. Roads in caribou habitat are not a new element in the North or the Rockies, and reviews of successes or failures in the mitigation of impacts of previous road projects with measures such as wildlife corridors need to be considered. Potential impacts of the mine itself are also worrisome. The proponent, based on recent telemetry data, states that the project is happening south of the herd calving grounds, but in relative proximity to them (especially considering the northward flow of the George River). The information that the mine itself in not located within calving grounds also seems to contradict Inuit Knowledge that has been provided by community members. This has two main consequences. First, if stating that the project is not directly affecting current calving grounds, the proponent will need to prove it both in the lenses of western science and of Indigenous Knowledge. Second, the proponent cannot base its evaluation of impacts and selection of mitigation measures only on the current state of the population and on data gathered after its collapse. While collecting more recent data on the population is definitely needed, pre-collapse knowledge and data on the state, range and habits of the population at its peak need to be considered too, in order to be able to evaluate potential impacts both on the population in its current state and on a larger population if it recovers.

Impacts to waterways and fish, either by the infrastructure itself, construction activities or accidental spills could be disastrous for Inuit, especially in the important harvesting area of IKadlivik. Brook trout, arctic char and Atlantic salmon have all been harvested in the area. Although the proponent often highlights only three major crossings, the hundreds of smaller ones along the road cannot be considered inconsequential. Modifications to the road design that limit the amount of water crossings or improve buffer zones for streams and waterways should be considered. As an aside, on the road design and operation, the use of the term seasonal road seems inaccurate, as it will be operational most of the year.

Cumulative Effects

The initial project description does identify most of the other projects the initiative could interact with, and but only some areas of potential cumulative effects. Voisey's mine and related operations are likely the biggest source here, notably in terms of impacts on Caribou and the marine environment. One element that is not included here but is a significant source of concern is the cumulative effects between the project and human-caused climate change. Wholly distinct from impacts of the project in terms of GHG emissions or impacts of climate change on the project itself, this should include, for example, consideration such as the potential cumulative impacts on Arctic char which will be at risk of negative impacts from both climate change and the project. Similarly, decrease in fish habitat should also be identified in the major potential areas of cumulative impacts.

Cumulative effects are generally mostly considered in the interactions between projects causing negative environmental impacts. However, in this case, efforts to help the George River caribou herd recover are amongst the activities whose expected impacts will combine with and be affected by those of the initiative, and vice versa. The current hunting ban on the George River caribou herd is the most significant measure in place, and comes at a cost to Inuit that cannot be understated. The potential of the project's impacts on the environment to reduce or negate environmental impacts of the hunting ban and other measures need to be properly assessed.

Climate Change

Impacts of the climate on the project are a concern, especially considering the harsh winter conditions in the area the road will cross and implications in terms of safety for workers and the environment in case of accidents. These need to be assessed in themselves, but they will also be important elements to include in the assessment of the resilience of the project to climate change, and in the development of safety and response plans for accidents along the road.

Mitigation Measures

As stated above, considering the almost unprecedented level of risk for the region, whether (and how) these risk can be mitigated needs to be demonstrated beyond doubts. The selection and assessment of mitigation measure have to be based on science and/or Indigenous Knowledge and be properly referenced. Problematic sources common in the Environmental Assessment world such as 'expert knowledge' or 'industry best practices' should not be used. If studies demonstrating the efficiency of proposed mitigation measures have never been undertaken, or cannot be provided by the proponent, each mitigation measure proposed should be backed by a detailed rationale including its mechanisms of action, predicted impact, and the level of confidence in its efficacy.

Crucially, and in addition to demonstrating the efficiency of individual mitigation measure, the proponent should provide an analysis of how the combination of selected mitigation measures work to provide a sufficient level of protection from potential negative impacts.

Assessment of alternatives

We are aware the proponent did not identify any economically viable alternatives to the main project components. However, the road is probably the element of the project most likely to have severe negative environmental impacts on Labrador Inuit Lands and the proponent itself had brought forward alternatives to it in earlier phases of project development. Considering its massive footprint, the proponent should properly describe alternatives and demonstrate why they are not feasible or desirable from both environmental, economic and technical point of views. This should especially include elements that the proponent itself had at one point considered viable alternatives, such as the use of airships for transport.

Essential Agreements

A number of crucial agreements between the proponent and Rightsholders, stakeholders or regulators will need to be put in place for this project to move forward, and are in general not addressed properly in the project description. Most importantly, the agreement between the Proponent and Vale for use of port infrastructure is a critical issue that needs to be sorted out as soon as possible especially if the proponent is not proposing any

alternatives. Limited correspondences on the subject are included in the confidential appendix B, but the proponent should provide updated information on the status of this agreement, in a form that the public can take into account.

Thank you for your time,

Frédéric Dwyer-Samuel

Avatet Kaujisattaugutinginnik Aulatsijik
Environmental Assessment Manager
Nunatsiavut kavamanga / Nunatsiavut Government