

Section	Subsection and page	Reference in the Draft Guidelines
3.3 Federal requirements and information	3.3.1 Project components and activities (p.17)	It states on p. 17 that "It should be noted that the high-purity separation plant in Sept Îles is not part of the Project evaluation by IAAC, while marine transportation <u>is limited to a restricted area on the Labrador Coast</u> ". Nevertheless, throughout the Joint IS Guidelines, the marine study area differs and may encompass transportation further in Labrador.
8.8.1 Fish and Fish Habitat Baseline Conditions	8.8.1.2 NL requirements and information (p.87)	"A thorough sampling program must be conducted for <b>Trout Pond</b> , regardless the route taken since this is the major lake of production for the Ikadlivik système and all routes will intersect its tributaries. Sampling methodology should be consistent with previous Gov NL sampling programs to ensure that data are comparable: Full-scal habitat assessments documenting locations of spawning areas, nursery streams, and holding, resting and migration areas for both SASA, SAAL"
8.8.2 Effects to Fish and Fish Habitat	8.8.2.1 Joint requirements and information	" ... and by carbon and nitrogen stable isotope measurements in fish and the complete fish food web"

### Comments

The marine study area should be more precisely defined in the Final Guidelines. As the Sept-Îles plant is not part of the Project evaluation by IAAC, the marine study area should be specific to Voisey's Bay. The existing marine route from Voisey's Bay to Sept-Îles is an existing route and already being used by other ships. Torngat Metals will submit to all the requirements that apply to all ships using this route.

Although the DPD presented options of access road, the current design considers only Option C, ending into Voisey's Bay. Therefore there is no connection to Trout Pond. As Option A of the access road (ending at Vale's connection) is not studied anymore, Trout Pond assessment should be excluded. We suggest that this request should be removed from the Final Guidelines.

Given the relatively simple trophic structure of northern food webs, the use of carbon and nitrogen isotope ratios is not required to establish its structure.