

Projet minier de terres rares Strange Lake – Torngat Metals Ltd.  
 Numéro de référence : 85969

## Projet minier de terres rares Strange Lake

Commentaires des autorités fédérales concernant la version provisoire des lignes directrices conjointes relatives à l'étude d'impact

<b>Ministère/agence</b>	Environnement et Changement climatique Canada		
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### Instructions :

1. Veuillez examiner les sections de la version provisoire des lignes directrices conjointes relatives à l'étude d'impact qui s'appliquent au mandat et aux expertises de votre ministère ou agence.
2. À l'aide du tableau ci-dessous, veuillez inclure vos recommandations sur la manière dont les lignes directrices conjointes finales relatives à l'étude d'impact devraient être modifiées :
  - Veuillez indiquer les corrections, les ajouts ou les suppressions à apporter au texte. Pour chaque recommandation, veuillez fournir une justification claire. **Pour tout ajout, veuillez-vous assurer que l'information n'est pas déjà exigée et brièvement expliquer la nécessité de l'ajout.**
  - **Veillez tenir compte du contexte du projet** et vous appuyer sur les éléments contenus dans la [description détaillée du projet](#) et les réponses du promoteur au sommaire des questions (voir à l'annexe A de la description détaillée du projet).
3. Les commentaires doivent être soumis au plus tard la fin du **23 septembre 2024** par courriel à l'adresse suivante : [StrangeLake@iaac-aeic.gc.ca](mailto:StrangeLake@iaac-aeic.gc.ca) Tous les commentaires soumis seront ensuite publiés sur le site web du Registre pour le projet (Numéro de référence 85969).

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Numéro du commentaire (p. ex., ECCC-01)	Section des Lignes directrices conjointes provisoires	Élément à commenter ou à modifier	Commentaire ou modification proposée et justification
ECCC-01	3.2.1.3 - Operation and Maintenance	<p>Quote (page 13) "<i>sources, predicted decibel levels and duration of noise, including noise during blasting</i>"; "<i>sources of light emissions</i>" should be included in this section.</p> <p>The same sensory disturbances listed in the "Construction" phase (page 13) should be included in the project components of the operation and maintenance phase (section 3.2.1.3).</p> <p>Noise and light, in particular, may have impacts on migratory birds and species at risk.</p>	ECCC recommends adding sources of potential sensory disturbance to the components of the operations and maintenance section (3.2.1.3), namely noise and light.
ECCC-02	Section 3.3.1.1.1 Mine site	<p>Quote (page 17): <i>storage and stockpiles of waste rock, overburden, topsoil, and low and medium grade ore (footprint, location, volume, development and management plans, and design criteria);</i></p> <p>According to the DPD, concentrate will only be trucked in winter, ECCC is of the opinion that a concentrate storage area will be necessary at the mine site.</p>	ECCC recommends adding the concentrate storage area to the project components.
ECCC-03	Section 3.3.1.1.1 Mine site	<p>Quote (page 18): "<i>storage and handling facilities for concentrate, chemical and hazardous materials and waste (footprint, location);</i>"</p> <p>A description of estimated quantities should be provided to adequately estimate the risk associated with the care and handling of hazardous materials and other substances.</p>	ECCC recommends the following modification: "Storage and handling facilities for concentrate, chemicals, hazardous materials, and waste (expected quantities of substances, and footprint and location of facilities);"
ECCC-04	Section 3.3.1.2.2	Quote (page 21): <i>management strategies of mine wastes, including topsoil, overburden, low and medium grade ore, waste rock and tailings;</i>	ECCC recommends adding the concentrate management strategy to project activities during the operation and maintenance phase. This management strategy must be described in order to know if the concentrate storage area should be included in section 8.3.1.1

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	Operation and maintenance	According to the DPD, concentrate will only be trucked in winter, ECCC is of the opinion that a concentrate storage area will be necessary at the mine site.	<p>(page 61) which states : <i>provide estimates of the potential for all materials (i.e., waste rock, ore, low and medium grade ore, pit wall materials, tailings, overburden, and potential construction material) to be sources of acid drainage, neutral mine drainage, metal(loid) leaching (including radionuclides), and/or radioactivity.</i></p> <p>The same need for a description of the concentrate management strategy is necessary in order to know if the concentrate area should be included in section 8.6.2.2 (page 75) which states: <i>present a 3-dimensional numerical groundwater flow model of the hydrogeological system that incorporates all major project components such as the open pit, waste rock piles, tailings management facilities, dewatering wells, and water diversion ditches:</i></p>
ECCC-05	7.1 - Baseline Methodology 7.1.2 - Newfoundland and Labrador requirements and information	Quote (page 42) " <i>avifauna including migratory birds and their habitat; fish and fish habitat (including species at risk, non-SAR and species of conservation concern, aquatic species including marine mammals, freshwater and marine environment; species at risk, species of conservation concern and their habitat requirements.</i> "	Editorial recommendation to improve consistency. ECCC recommends modifying the text to "avifauna including migratory birds and their habitat (including <b>migratory bird species at risk</b> and species of conservation concern)" to remain consistent with the "fish and fish habitat" bullet.
ECCC-06	7.2 - Selection of valued components 7.2.3 - Federal requirements and information	Species at risk and species of conservation concern have not been included in the list of valued components (Table on pages 44/45), despite section 8.11 of the guidelines dedicated to requirements related to species at risk.	ECCC recommends that "species at risk and species of conservation concern" be included in Section 7.2.3 in the list of valued components that will be included in the Impact Statement.
ECCC-07	7.6 - Cumulative effects assessment	Quote (page 55) " <i>the analysis must include the effects of past, existing and future projects and physical activities in combination with residual effects of the Project, taking into account how the effects may interact (additive, synergistic, compensatory, and masking effects).</i> "	ECCC notes that the proponent should include the proposed new Nain Airport Project ( <a href="http://New Nain Airport Project (iaac-aeic.gc.ca)">New Nain Airport Project (iaac-aeic.gc.ca)</a> ) as part of the cumulative effects assessment for the port and portion of the road.

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	7.6.1 - Joint requirements and information	Additional recommendation included for proponent's consideration in cumulative effects assessment.	ECCC proposes to include the proposed new Nain airport project in the list of the projects to be considered for the cumulative impact assessment for the port and a portion of the road.
ECCC-08	8.5 8.5.1 Conditions de référence 8.5.1.1 Exigences et information conjointes	Quote (page 64) <i>Characterize the ambient air quality in the study areas and identify existing emissions and contaminant sources. Include a description of the impact of forest fires, if applicable, by referring to the Portrait statistique des feux de forêt published by the Ministère des Ressources naturelles et des Forêts du Québec and the Canadian National Fire Database;</i>	Because of the project's proximity to the province of Newfoundland and Labrador, ECCC recommends to include a description of the impact of forest fires on ambient air quality if applicable, by referring to the Fisheries, Forestry and Agriculture or other relevant Newfoundland and Labrador site. <a href="#">Forest Fire Statistics - Fisheries, Forestry and Agriculture</a>
ECCC-09	8.5.2 Effets sur l'environnement atmosphérique, acoustique et visuel 8.5.2.1 Exigences et information conjointes.	<p>Dans la version française à la page 72, on lit cette exigence :</p> <ul style="list-style-type: none"> <li>• <i>utiliser la modélisation de la dispersion atmosphérique pour prévoir le devenir des polluants atmosphériques provenant des sources d'émission liées au projet, avec un domaine suffisamment vaste pour identifier les effets sur la qualité de l'air pour tous les récepteurs sensibles, et fournir des cartes de contours à l'échelle appropriée<sup>1</sup> indiquant les niveaux de polluants prévus pour toutes les étapes du projet (voir l'Annexe 1 - Orientations complémentaires).</i></li> </ul> <p>Les deux termes surlignés en jaune nécessiteraient une correction.</p>	<p>ECCC recommande de remplacer le terme « vaste » par le terme « large ». Vaste semble exagéré dans ce contexte.</p> <p>ECCC recommande également de remplacer le terme « niveaux » par « concentrations »</p> <ul style="list-style-type: none"> <li>• utiliser la modélisation de la dispersion atmosphérique pour prévoir le devenir des polluants atmosphériques provenant des sources d'émission liées au projet, avec un domaine suffisamment large pour identifier les effets sur la qualité de l'air pour tous les récepteurs sensibles, et fournir des cartes de contours à l'échelle appropriée<sup>2</sup> indiquant les concentrations de polluants prévus pour toutes les étapes du projet (voir l'Annexe 1 - Orientations complémentaires).</li> </ul>

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ECCC-10	<p>8.5.2 Effets sur l'environnement atmosphérique, acoustique et visuel</p> <p>8.5.2.1 Exigences et information conjointes.</p>	<p>Dans la version française, la note de bas de page numéro 9 (page 72) se lit comme suit :</p> <p><i><sup>9</sup> Étendre les cartes en courbes de niveau à l'intérieur des limites de la propriété dans les zones où les utilisations traditionnelles des terres seront autorisées à se poursuivre, le cas échéant.</i></p> <p>En anglais, on mentionne des courbes de contour.</p> <p>Cependant, ce qui est en fait recherché, ce sont les courbes de concentrations (ou iso-concentrations) à l'intérieur des limites de la propriété dans les zones traditionnelles des terres.</p> <p>Note :</p> <ul style="list-style-type: none"> <li>- Les cartes de contour ou cartes en courbes de niveau représentent la géographie et autres éléments de la région (relief, plans d'eau, chemins, etc.).</li> <li>- Les résultats de la dispersion peuvent être visualisés sous forme de courbes d'isoconcentration (courbes reliant les points sur la carte avec la même concentration) sur une carte de contour.</li> </ul>	<p>ECCC recommande le texte suivant pour traduire cette exigence :</p> <p><sup>9</sup> Étendre les cartes de <b>contour et les courbes d'isoconcentration</b> à l'intérieur des limites de la propriété dans les zones où les utilisations traditionnelles des terres seront autorisées à se poursuivre, le cas échéant.</p>
ECCC-11	<p>8.6 Eaux souterraines et eaux de surface</p> <p>8.6.1 Conditions de référence</p> <p>8.6.1.2 Exigences et information fédérales</p>	<p>Dans la version française, la note de bas de page numéro 10 (page 79) se lit comme suit:</p> <p><i>Étant donné que de nombreux contaminants potentiellement préoccupants (CPP), tels que le fluorure, sont plus facilement mobilisés dans les déchets miniers que dans leur état in situ, il est recommandé d'envisager d'abaisser la limite de détection rapportée (LDR) en dessous de la valeur de <b>la directive canadienne sur la qualité de l'eau pour la protection de la vie aquatique</b></i></p>	<p>ECCC recommande un changement concernant la référence surlignée. Pour plus de précision, ECCC recommande de citer plutôt : les Recommandations canadiennes pour la qualité des eaux : protection de la vie aquatique dans la note de bas de page numéro 10 et d'ajouter la source dans les deux langues soit : le Conseil canadien des ministres de l'environnement (CCME) Canadian Council of Ministers of the Environment.</p>

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ECCC-12	8.6.1.2  Groundwater and surface water Baseline conditions	Quote (page 71) : <ul style="list-style-type: none"> <li>• <i>describe and illustrate on one or more topographic maps, at appropriate scales, the drainage basins in relation to key project components. On the map(s), identify all waterbodies and watercourses, including intermittent streams, flood risk areas, wetlands, watershed and sub-watershed boundaries, and direction of flow;</i> <ul style="list-style-type: none"> <li>◦ <i>if applicable, indicate the intended locations of water crossings and watercourse diversions;</i></li> </ul> </li> </ul>	ECCC recommends adding the following highlighted text to improve the project description by addressing all relevant project components and the location where the project interacts with the receiving environment : <ul style="list-style-type: none"> <li>• describe and illustrate on one or more topographic maps, at appropriate scales, the drainage basins in relation to key project components. On the map(s), identify all waterbodies and watercourses, including intermittent streams, flood risk areas, wetlands, watershed and sub-watershed boundaries, and direction of flow; <ul style="list-style-type: none"> <li>◦ if applicable, indicate the intended locations of water crossings and watercourse diversions, <b>proposed water intake, and proposed effluent discharge(s);</b></li> </ul> </li> </ul>
ECCC-13	8.6.1.2  Groundwater and surface water Baseline conditions	Quote (page 71): <ul style="list-style-type: none"> <li>• <i>provide flow hydrographs and corresponding water levels for nearby streams and rivers including any site-specific rating curves (and manually collected flow/level data), if available, showing the full range of seasonal and inter-annual variations; as well as seasonal low-flow for baseflow quantification;</i> <ul style="list-style-type: none"> <li>◦ <i>hydrographs may be based on data from nearby gauging stations or from gauging stations on site if appropriate rationale is provided to explain its applicability;</i></li> </ul> </li> </ul>	ECCC recommends adding the following highlighted text to improve the project description by addressing provide a description and justification of the collection methods and data used. <ul style="list-style-type: none"> <li>• provide flow hydrographs and corresponding water levels for nearby streams and rivers including <b>a description of the methods used</b> (such as any site-specific rating curves <b>and their accuracy,</b> and manually collected flow/level data) showing the full range of seasonal and inter-annual variations; as well as seasonal low-flow for baseflow quantification; <ul style="list-style-type: none"> <li>◦ hydrographs may be based on data from nearby gauging stations or from gauging stations on site <b>with specific</b></li> </ul> </li> </ul>

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			justification for using the data and if appropriate rationale is provided to explain its applicability;
ECCC-14	8.6.1.2 Groundwater and surface water Baseline conditions	Quote (page 72): <ul style="list-style-type: none"> <li>• <i>using traditional field and mapping techniques, provide a delineation and characterization of groundwater–surface water interactions, including an identification of groundwater-dependent ecosystems, wetlands, discharge, and recharge areas that are potentially affected by the Project;</i> <ul style="list-style-type: none"> <li>◦ <i>the chosen field and mapping techniques should take into account the potential effect that changes to groundwater-surface water interactions have on fish and fish habitat;</i></li> </ul> </li> </ul>	ECCC recommends adding the following highlighted text to clarify that the groundwater–surface water interactions must be quantified with sufficient level of detail required to conduct the assessment. This requirement highlights the importance of precise and comprehensive data. <ul style="list-style-type: none"> <li>• using traditional field and mapping techniques, provide a delineation and characterization of groundwater–surface water interactions, including an identification of groundwater-dependent ecosystems, wetlands, discharge, and recharge areas that are potentially affected by the Project;</li> <li>◦ the chosen field and mapping techniques should take into account the potential effect that changes to groundwater-surface water interactions have on fish and fish habitat and the level of accuracy should be sufficient to characterize these interactions at the level of detail required for the assessment;</li> </ul>
ECCC-15	8.6.1.2 Groundwater and surface water Baseline conditions	Quote (page 72): <ul style="list-style-type: none"> <li>◦ <i>develop a quantitative surface water balance for watersheds potentially affected by the Project, detailing water intake and outflow to the environment;</i></li> </ul>	ECCC recommends adding the following highlighted text because the interaction between surface and groundwater needs to be taken into consideration to develop a reliable surface water balance <ul style="list-style-type: none"> <li>◦ <i>develop a quantitative surface water balance for watersheds potentially affected by the Project, detailing water intake and outflow to the environment and incorporating interactions between the surface and groundwater regimes;</i></li> </ul>

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ECCC-16	8.6.1.2  Groundwater and surface water Baseline conditions	Quote (page 72):  <ul style="list-style-type: none"> <li>○ <i>provide baseline data for relevant physicochemical parameters and chemical constituents for surface water, groundwater, and sediment quality;</i></li> </ul>	ECCC recommends that baseline data must be collected to capture seasonal and inter-annual fluctuations, providing a more comprehensive understanding of the variability in surface water, groundwater, and sediment quality over time.  <ul style="list-style-type: none"> <li>• provide baseline data for relevant physicochemical parameters and chemical constituents for surface water, groundwater, and sediment quality, including temporal variations in these parameters, to fully capture seasonal and inter-annual fluctuations;</li> </ul>
ECCC-17	8.6.1.2  Groundwater and surface water Baseline conditions	Quote (page 74):  <ul style="list-style-type: none"> <li>○ <i>present a conceptual model for the hydrological environment, as appropriate to describe baseline conditions for surface waters. The model should be developed to support the assessment of potential changes to water and sediment quantity and quality in watercourses, waterbodies, and wetlands, with input from regulators and Indigenous groups;</i></li> </ul>	ECCC recommends adding the highlighted text because the uncertainty of effects predicted by the conceptual model for the hydrological environment is dependent on its accuracy, calibration, and sensitivity analysis.  <ul style="list-style-type: none"> <li>• present a conceptual model for the hydrological environment, as appropriate to describe baseline conditions for surface waters (quantity and quality). The model should be developed to support the assessment of potential changes to water and sediment quantity and quality in watercourses, waterbodies, and wetlands, with input from regulators and Indigenous groups, including: <ul style="list-style-type: none"> <li>○ state limitations, and assumptions in the proposed modelling approach, including calibration methods, model validation, accuracy and limitations;</li> <li>○ calibrate the conceptual model to baseline hydrological conditions using stream flow monitoring data; and</li> </ul> </li> </ul>

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			<ul style="list-style-type: none"> <li>○ analyze the sensitivity of key model outputs to interactions between the groundwater-surface water and climatic parameters, and describe uncertainty within the model as it relates to model assumptions;</li> </ul>
ECCC-18	8.6.2 Effects to groundwater and surface water  8.6.2.2 Federal requirements and information	Quote (page 75): <ul style="list-style-type: none"> <li>○ <i>quantify the extent of hydrological changes resulting from disturbances to groundwater and surface water features for each phase of the Project, taking into account climate change (see also sections 8.12 Climate change and 12 Effects of the Environment on the Project). This includes changes to the quantity or timing of surface flow, water levels, ice thickness or extent, sediment input, and channel regime in watercourses, and water levels in affected waterbodies;</i></li> </ul>	ECCC recommend adding the highlighted text to ensure a more comprehensive assessment of hydrological changes by considering not only climate change, but also the effects of extreme weather events <ul style="list-style-type: none"> <li>• quantify the extent of hydrological changes resulting from disturbances to groundwater and surface water features for each phase of the Project, taking into account <b>extreme precipitation events and</b> climate change (see also sections 8.12 Climate change and 12 Effects of the Environment on the Project). This includes changes to the quantity or timing of surface flow, water levels, ice thickness or extent, sediment input, and channel regime in watercourses, and water levels in affected waterbodies;</li> </ul>
ECCC-19	8.6.2.2 Effects to groundwater and surface water	Quote (page 75); <ul style="list-style-type: none"> <li>○ <i>present an integrated site water balance model incorporating surface and groundwater fluxes to or from all major project components, for all project phases. Include estimates of surface water runoff rates for major project components;</i></li> </ul>	ECCC recommends adding this new text to provide a clear understanding of how different water flows are managed and discharged and ensuring a detailed and transparent assessment of water management throughout the Project's life cycle. We recommend adding this text after the requirement in the left column. <ul style="list-style-type: none"> <li>○ synthesize results of the site water balance model to clearly present the flow composition (flow differentiated by their source) reporting to each water management feature or proposed discharge point to the environment at all stages of the Project's life cycle. Flow composition should</li> </ul>

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			<p>be presented in graphical and tabular forms and at a suitable temporal scale, to evaluate the proposed volumes of water management ponds, treatment capacity of proposed water management plants and the assimilative capacity of the receiving environment under median and extreme climatic conditions.</p>
ECCC-20	8.6.2.2 Effects to groundwater and surface water	<p>Quote (page 76);</p> <ul style="list-style-type: none"> <li>○ <i>using the 3-dimensional numerical groundwater flow model:</i></li> </ul>	<p>ECCC recommends adding a sub-bullet to consider the potential seepage from nearby Lac Brisson to the open pit which may represent a large component to the total flow to be managed on the mine site. Quantifying these flows may be relevant to assess the proposed water management plant.</p> <ul style="list-style-type: none"> <li>○ using the 3-dimensional numerical groundwater flow model:</li> <li>○ quantify the potential seepage from Lac Brisson to the proposed open pit during all phases of the Project;</li> </ul>
ECCC-21	8.6.2.2 Effects to groundwater and surface water		<p>ECCC recommends adding this requirements to section on effect to groundwater and surface water 8.6.6.2 (p 75) to ensure a detailed assessment of potential impacts from discharging effluent into Lac Brisson and to support effluent design and mitigation strategies to protect Lac Brisson's environmental quality.</p> <ul style="list-style-type: none"> <li>• if the effluent is proposed to be discharged to Lac Brisson, present a hydrodynamic model developed to characterize the receiving environment (vertical mixing regime, current speeds, residence time) and use the calibrated 3-dimensional hydrodynamic model of the receiving environment to evaluate the mixing zones, cumulative effects and potential for changes in</li> </ul>

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			the vertical mixing regime of Lac Brisson. Alternative modelling methods could be considered if appropriate rationale is provided to explain its applicability.
ECCC-22	8.6.2.2 Effects to groundwater and surface water		<p>ECCC recommends adding this requirement to the section on effect to groundwater and surface water 8.6.6.2 to ensure the flooded pit lake could support fish and fish habitat after the post-closure phase.</p> <ul style="list-style-type: none"> <li>characterize the limnology of the proposed pit lake once flooded by evaluating the vertical mixing regime of the pit lake and water quality at depth and surface;</li> </ul>
ECCC-23	8.6.2.2 Effects to groundwater and surface water	<p>Dans la version française à la page 84 3<sup>e</sup> boulette :</p> <ul style="list-style-type: none"> <li><i>les changements de la qualité des eaux de surface, des eaux souterraines et des sédiments <b>des</b> à tous les rejets et effluents du projet, y compris les changements des paramètres physicochimiques (température, pH, salinité, oxygène dissous), et les constituants chimiques pertinents (y compris les éléments de terres rares, le zirconium, le béryllium, le niobium et l'yttrium, les ions majeurs et mineurs), zirconium, béryllium, niobium et yttrium, ions majeurs et mineurs, métaux traces (y compris l'arsenic), radionucléides (y compris le thorium, l'uranium et leurs descendants), nutriments, composés organiques), et en tenant compte des changements prévus dans la quantité d'eau;</i></li> </ul>	<p>ECCC recommande de changer pour ce libellé en remplaçant « des » par « dus » :</p> <ul style="list-style-type: none"> <li>les changements de la qualité des eaux de surface, des eaux souterraines et des sédiments <b>dus</b> à tous les rejets et effluents du projet, y compris les changements des paramètres physicochimiques (température, pH, salinité, oxygène dissous), et les constituants chimiques pertinents (y compris les éléments de terres rares, le zirconium, le béryllium, le niobium et l'yttrium, les ions majeurs et mineurs), zirconium, béryllium, niobium et yttrium, ions majeurs et mineurs, métaux traces (y compris l'arsenic), radionucléides (y compris le thorium, l'uranium et leurs descendants), nutriments, composés organiques), et en tenant compte des changements prévus dans la quantité d'eau;</li> </ul>

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ECCC-24	8.6.3 Mitigation and enhancement measures	Quote (page 80); <ul style="list-style-type: none"> <li>• <i>describe and justify water use for the Project and the measures that will be taken to eliminate or reduce the adverse effects, including the supply and discharge of water and potential exchanges between watersheds;</i></li> </ul>	ECCC recommends adding this requirement ensures that the potential impacts on natural hydrologic regimes are explicitly considered. It highlights the need to evaluate how the project may alter existing water flow patterns and which is crucial for understanding and mitigating potential ecological and hydrological impacts on watercourses and waterbodies. <ul style="list-style-type: none"> <li>• describe and justify water use for the Project and the measures that will be taken to eliminate or reduce the adverse effects, including the supply and discharge of water, potential exchanges between watersheds <b>and changes to natural hydrologic regimes in affected watercourses and waterbodies;</b></li> </ul>
ECCC-25	8.6.3 Mitigation and enhancement measures		ECCC recommends adding this mitigation measure requirement to ensure that the water storage systems are clearly defined and properly designed for capturing and reusing water throughout all Project phases <ul style="list-style-type: none"> <li>• specify the design and capacity of water storage systems that will be implemented for the capture and reuse of water during all phases of the Project. This should include retention ponds, tanks, or other infrastructure used to store precipitation, snowmelt, surface runoff, and treated water for future use in operations or environmental management.</li> </ul>
ECCC-26	8.6.3 Mitigation and enhancement measures	<ul style="list-style-type: none"> <li>• <i>describe groundwater and surface water monitoring programs during, as applicable, the construction, operation and maintenance, decommissioning, and the rehabilitation phases, including:</i> <ul style="list-style-type: none"> <li>○ ...</li> </ul> </li> </ul>	ECCC recommends to replace flow reductions to flow changes in order to scope any alterations in surface water flow, not just reductions. <ul style="list-style-type: none"> <li>• describe groundwater and surface water monitoring programs during, as applicable, the construction, operation and</li> </ul>

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		<ul style="list-style-type: none"> <li>○ <i>the proposed monitoring points to assess changes to surface water quantity, which should include watercourses and waterbodies with the potential for flow reductions</i></li> </ul>	<p>maintenance, decommissioning, and the rehabilitation phases, including:</p> <ul style="list-style-type: none"> <li>○ ... <ul style="list-style-type: none"> <li>○ the proposed monitoring points to assess changes to surface water quantity, which should include watercourses and waterbodies with the potential for flow changes;</li> </ul> </li> </ul>
ECCC-27	8.9 - Birds and birds habitat  8.9.1 Joint requirements and information	<p>Quote (page 93) “<i>describe and map the general biodiversity of bird species and their habitat that are found or are likely to be found in the LSA and RSA, based on available information from desktop analysis, supplemented by field data as necessary to build confidence in the assumptions...</i>”</p> <p>Editorial note to include the project area in this bullet.</p>	ECCC recommends that this bullet be modified to include the Project area as well: “describe and map the general biodiversity of bird species and their habitat that are found or are likely to be found in the <b>Project Area</b> , LSA and RSA...”
ECCC-28	8.11.3 - Baseline conditions 8.11.3.1 - Federal requirements and information	<p>Quote (page 103) “<i>provide information and mapping at an appropriate scale for potential habitats, survey sites, species sightings records, the areas of highest concentration or areas of use, residences, habitat requirements, key habitat areas, identified or proposed critical habitats and/or recovery habitat (where applicable and unless such information is considered sensitive), seasonal movements, and movement corridors</i></p>	<p>For the bats, ECCC suggested that the following bullets should be included or added to the baseline section 8.11.3.1:</p> <ul style="list-style-type: none"> <li>● Provide detailed information and mapping at an appropriate scale for any bat hibernacula and roosting habitat in the project and study areas.</li> <li>● Describe how bat behaviour (differentiated by species) has been taken into account, based on the geographical location and time period of project activities;</li> </ul>
ECCC-29	8.11.4 - Effects to species at risk and their habitat 8.11.4.1 - Newfoundland and Labrador requirements and information	<p>Quote (page 105) “<i>an assessment and description of historical and recent caribou distribution and habitat use at various temporal and spatial scales using recent data available from both Newfoundland and Labrador, and Quebec (upon finalization of a data sharing agreement between the Proponent and the Province). This assessment shall include:</i></p> <ul style="list-style-type: none"> <li>● <i>Appropriate analyses and interpretation of data to ensure a fulsome understanding of the George River Caribou Herd range use throughout the</i></li> </ul>	ECCC notes that Section 8.10 - Terrestrial wildlife and their habitat includes additional information requirements related to Eastern Migratory Caribou (EMC), which includes the George River Caribou Herd, which may cause confusion given that information requirements for EMC are also included in Section 8.11 - Species at Risk and their habitat. ECCC recommends that all EMC-related information requirements should be included in the same section to avoid confusion.

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		<p><i>various biological seasons and population cycles and to ensure compatible analysis across Quebec and NL datasets; and</i></p> <ul style="list-style-type: none"> <li>• <i>Indigenous Knowledge on Eastern Migratory Caribou into the baseline information.</i></li> </ul> <p><i>The Impact Statement must present an evaluation of mitigation measures to ensure viability of George River Caribou Herd (GRCH) population during all phases of the Project including but not limited to:</i></p> <ul style="list-style-type: none"> <li>• <i>A literature review of the effects of linear features on caribou populations and the potential direct and indirect effects on the GRCH, including but not limited to effects of habitat fragmentation, increased predator efficiency, increased ease of human access to caribou groups, and cumulative effects;</i></li> <li>• <i>A literature review of potential implications of all aspects of this project (in Quebec and Labrador) on the atmospheric deposition of contaminants on caribou forage, including impacts to contaminant and heavy metal loads within caribou meat and organs;</i></li> <li>• <i>A spatiotemporal analysis of caribou movement identifying migration corridors and interactions with the proposed road location and other relevant project features; and</i></li> <li>• <i>An analysis to discuss/determine whether potential effects of the proposed undertaking on the GRCH can be mitigated to the extent that the Project will not hinder the population's recovery from its current 1% of previous maximum population size."</i></li> </ul> <p>The Eastern Migratory Caribou requirements are currently separated into two sections (8.10 - Terrestrial Wildlife and 8.11 - Species at Risk).</p>	

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ECCC-30	Section 8.12.1 Federal requirements and information	<p>Quote (page 107)</p> <p><i>The Impact Statement must:</i></p> <ul style="list-style-type: none"> <li>• <i>assess the project's GHG emissions as described in section 5 of the SACC and section 2.1 of the Technical Guide;</i></li> <li>• <i>provide a quantitative and qualitative description of the project's positive or negative effects on carbon sinks as described in section 5.1.2 of the SACC and section 4 of the Technical Guide;</i></li> <li>• <i>an explanation of how the Project may impact Canada's effort to reduce GHG emissions in Canada and globally as described in section 5.1.3 of the SACC and in the Technical Guide; and</i></li> <li>• <i>a description of the impact of increased forest fires that may result from the Project on climate change.</i></li> </ul>	<p>ECCC recommends Including the following additional bullet points to cover the SACC. ECCC recommends 2 grammatical edits in the last 2 bullets.</p> <ul style="list-style-type: none"> <li>• assess the project's GHG emissions as described in section 5 of the SACC and section 2.1 of the Technical Guide;</li> <li>• provide a quantitative and qualitative description of the project's positive or negative effects on carbon sinks as described in section 5.1.2 of the SACC and section 4 of the Technical Guide;</li> <li>• include a discussion on the development of emissions estimates and uncertainty assessment (refer to Section 3.3 of the SACC);</li> <li>• when applicable, include a description of large sources of GHG emissions that may be the consequence of accidents or malfunctions; and</li> <li>• include an explanation of how the Project may impact Canada's effort to reduce GHG emissions in Canada and globally as described in section 5.1.3 of the SACC and in the Technical Guide; and</li> <li>• include a description of the impact of increased forest fires that may result from the Project on climate change.</li> </ul>
ECCC-31	Section 8.12.1.1 Mitigation for climate change and greenhouse gas emissions	<p>Quote (page 107)</p> <p><i>In terms of mitigation measures, the Impact Statement must include a determination of Best Available Technologies and Best Environmental Practices (BAT/BEP) as described in Section 3.2 of the technical guidance. This BAT/BEP determination process will evaluate potential mitigation measures throughout all phases of the Project with an emphasis on reducing net GHG emissions as early as possible in the life of the Project, as described in Section 5.1.4 of the SACC. Additional guidance is provided in Sections 3.4.1 and 3.4.2 of the Technical Guide.</i></p>	<p>ECCC recommends those following edits to align with the approved TISG text and include the mitigation measures for carbon sinks (3.4.3 and 3.5.3).</p> <p>In terms of mitigation measures, the Impact Statement must include a determination of Best Available Technologies and Best Environmental Practices (BAT/BEP) as described in Section 3.2 of the <b>Technical Guide</b>. This BAT/BEP determination process will evaluate potential mitigation measures throughout all phases of the Project with an emphasis on <b>minimizing</b> net GHG emissions as early as possible <b>and throughout the project lifetime</b>, as described in</p>

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		<p><i>If the proponent determines that there will be activities beyond 2050, the proponent must also provide a credible plan to achieve net-zero emissions that would be used for and form the basis of the BAT/BEP determination process, describing the mitigation measures that will be taken to minimize GHG emissions during all project phases and achieve net-zero emissions by 2050, as described in section 5.3 of the SACC. The plan to achieve net-zero emissions must follow the principles and include the required information that is described in sections 3.5.1 and 3.5.2 respectively of the Draft Technical Guide, or any final version of the Technical Guide that becomes available prior to submission of the Impact Statement.</i></p>	<p>Section 5.1.4 of the SACC. Additional guidance is provided in Sections 3.4.1, <b>3.4.2 and 3.4.3</b> of the Technical Guide.</p> <p>If the proponent determines that there will be activities beyond 2050, the proponent must also provide a credible plan to achieve net-zero emissions that would be used for and form the basis of the BAT/BEP determination process, describing the mitigation measures that will be taken to minimize GHG emissions during all project phases and achieve net-zero emissions by 2050, as described in section 5.3 of the SACC. The plan to achieve net-zero emissions must follow the principles and include the required information that is described in sections <b>3.5.1, 3.5.2 and 3.5.3 of the Technical Guide</b>, or any final version of the Technical Guide that becomes available prior to submission of the Impact Statement.</p>
ECCC-32	Section 11.1.3 Emergency management	<p>Quote (p. 145) <i>The Impact Statement shall include an Emergency Response/Contingency Plan that describes procedures, equipment and responsibilities that are in place to ensure an efficient and effective response. The plan shall establish an emergency communication strategy with those potentially affected and must describe the capacity of the proponent/nearby communities to respond to each type of accident, malfunction or emergency, including the availability of required response equipment and training. The plan must include at a minimum the following:</i></p> <ul style="list-style-type: none"> <li>● <i>accidental spills and/or releases of gasoline and associated products, chemicals, pesticides, oily waste, or any potentially hazardous substance on land or in air or water;</i></li> <li>● <i>fire (including wildfires) and explosion;</i></li> <li>● <i>motor vehicle accidents and marine vessel collisions involving other vessels, marine mammals, ice or navigational hazards;</i></li> </ul>	<p>The Project includes the operation of an aerodrome, which should be considered in the emergency management plan. ECCC recommends modifying the highlighted bullet by adding aircraft.</p> <p>“Motor vehicle, <b>aircraft</b> accidents, and marine vessel collisions involving other vessels, marine mammals, ice or navigational hazards;”</p>
ECCC-33	Appendix 1 – Additional guidance; Birds	Quote (page 166) <i>“survey protocol planning should include modelling and simulations to estimate sampling requirements and analysis to evaluate resulting survey</i>	ECCC recommends modifying this bullet into two separate bullets, as follows:

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	and their habitat	<p><i>options. It is recommended to collect field data over at least two years. The goal of collecting data over multiple years is to improve the understanding of natural variability in populations. Two years of sampling is suggested as a minimum to achieve that goal. As the number of sampling years increases so does the understanding of natural variability; use spatially balanced and randomly chosen sampling sites, preferably using stratified random sampling that covers all habitat types. When major habitat edges are identified, sampling should be designed such that it is possible to sufficiently describe the importance not only of the types of habitat, but also of the edges between the types of habitat;</i>"</p> <p>Editorial note – the quoted statement appears to be two bullets combined into one; ECCC recommends modifying to two separate bullets.</p>	<ul style="list-style-type: none"> <li>• survey protocol planning should include modelling and simulations to estimate sampling requirements and analysis to evaluate resulting survey options. It is recommended to collect field data over at least two years. The goal of collecting data over multiple years is to improve the understanding of natural variability in populations. Two years of sampling is suggested as a minimum to achieve that goal. As the number of sampling years increases so does the understanding of natural variability;</li> <li>• use spatially balanced and randomly chosen sampling sites, preferably using stratified random sampling that covers all habitat types. When major habitat edges are identified, sampling should be designed such that it is possible to sufficiently describe the importance not only of the types of habitat, but also of the edges between the types of habitat;"</li> </ul>
ECCC-34	Appendix 2 – Resources and Guidance;	Missing references/guidance resources in Appendix 2.	<p>ECCC notes that the following references/guidance materials are missing from Appendix 2 and should be included:</p> <p>Species at risk:</p> <ul style="list-style-type: none"> <li>• <i>Species at Risk</i>. Newfoundland and Labrador Department of Fisheries, Forestry and Agriculture. Available at: <a href="http://www.gov.nl.ca/species-at-risk/">Species at Risk - Fisheries, Forestry and Agriculture (gov.nl.ca)</a></li> <li>• <i>Loi sur les espèces menacées ou vulnérables</i> – Gouvernement du Québec. Available at: <a href="http://www.gouv.qc.ca/les-especes-menacees/">Loi sur les espèces menacées ou vulnérables: version administrative modifiée par le projet de loi 102 (gouv.qc.ca)</a></li> <li>• <i>Species at Risk Act Permitting Policies</i>. Government of Canada. Available at: <a href="http://www.canada.ca/permitting-en.pdf">Permitting_EN.pdf (canada.ca)</a></li> </ul> <p>Wetlands:</p> <ul style="list-style-type: none"> <li>• Policy for Development in Wetlands (<a href="http://www.gov.nl.ca/ecc/watersres/regulations/policies/wetlands/">www.gov.nl.ca/ecc/watersres/regulations/policies/wetlands/</a>)</li> </ul>