

Strange Lake rare earth project - Torngat Metals Ltd.  
Reference number: 85969

## Strange Lake Rare Earth Mining Project

### Comments from the federal authorities on the draft version of the Joint Impact Statement Guidelines

<b>Ministry/Agency</b>	Employment and Social Development Canada (ESDC)		
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#### Instructions :

1. Please review the sections of the draft Joint Impact Statement Guidelines that apply to your department's or agency's mandate and expertise.
2. Using the table below, please include your recommendations on how the final Joint Impact Statement Guidelines should be modified:
  - Please indicate any corrections, additions or deletions to be made to the text. For each recommendation, please provide a clear justification. **For any additions, please ensure that the information is not already required and briefly explain the need for the addition.**
  - **Please take into account the context of the project** and draw on the elements contained in the [detailed project description](#) and the proponent's answers to the Summary of Issues (see Appendix A of the detailed project description).
3. Comments must be submitted no later than the end of **September 23, 2024** by e-mail to [StrangeLake@iaac-aeic.gc.ca](mailto:StrangeLake@iaac-aeic.gc.ca). All comments submitted will then be published on the Registry website for the project (Reference number 85969).

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Comment number (e.g. ECCC-01)	Draft Joint Guidelines section	Item for comment or modification	Comment or proposed change and justification
ESDC - 01	9.1.1. Baseline conditions, (p.113).	<p>“The Impact Statement shall describe relevant community elements, in jurisdictions with and without municipal plans and development regulations, including municipalities, Inuit Communities, Labrador Inuit Lands, Labrador Inuit Settlement Areas, and unincorporated communities in the study areas of the Project, including the following:</p> <ul style="list-style-type: none"> <li>- population demographics and health status, including physical, mental, and social well-being;</li> <li>- family life, recreation, and culture;</li> <li>- education and training facilities and programs;</li> <li>- housing, accommodations, and property values;</li> <li>- fire and emergency services;</li> <li>- health care services including mental health and addiction services, social programs, and other community services;</li> <li>- active municipal, governmental or non-governmental working groups or committees; and</li> <li>- municipal infrastructure or services to be used by the Project and the capacity of the infrastructure and services to support the Project, including human resources, equipment and training.”</li> </ul>	<p>It is recommended that examples be provided for each of the relevant community elements that are listed in section 9.1.1 to ensure the proponent provides the correct categories of information regarding each element.</p>
ESDC - 02	9.1.1. Baseline conditions, (p.113).	<p>“In addition, the Impact Statement shall describe relevant economy, employment and business elements in the study areas of the Project, including the following:</p> <ul style="list-style-type: none"> <li>- economy of the regions in the project area;</li> <li>- value of existing industries including cultural and recreational; mining, mineral and quarrying; commercial, recreational, and Indigenous fisheries industrial operations and other major employers.</li> <li>- employment in the region;</li> <li>- availability of skilled and unskilled labour in the region and in the province;</li> <li>- business capacity relative to goods and services; and</li> <li>- employment equity and diversity including under-represented groups.”</li> </ul>	<p>It is recommended that in section 9.1.1. clarity be provided regarding the following:</p> <ul style="list-style-type: none"> <li>- The categories of economic activity (ie. employment, labour force) being requested with respect to relevant project regions;</li> <li>- A clear definition of the concept of value being referred to with respect economic and/or social benefits;</li> <li>- The categories of employment being requested that exist within the proposed Project’s region;</li> <li>- Specify the periods of time that skilled and unskilled labour is accessible within the timeframe of the proposed Project’s construction and operation schedule;</li> <li>- If any existing government level programs regarding employment equity and diversity are currently in practice in compatible industries in the region.</li> </ul>

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ESDC - 03	9.2.1. 1. Baseline conditions, (p. 117).	<p>“Baseline conditions must be described using disaggregated data for diverse population groups (e.g., Indigenous Peoples, women, youth, Elders, etc.) and their different access to resources, opportunities and services within the community to support GBA Plus.</p> <p>The Impact Statement must provide:</p> <ul style="list-style-type: none"> <li>- an overview of the main economic activities in the study areas, including information on the economically active members of the local, regional and Indigenous population;</li> <li>- existing employment rates, including principal employment and economic well-being in the study areas and impacted communities;</li> </ul> <p>an overview of the workforce, including:</p> <ul style="list-style-type: none"> <li>- the availability of skilled and unskilled workers, including a qualitative summary of the conditions that influence workforce availability over the proposed project timeline,</li> <li>- existing working conditions,</li> <li>- wages and average salary range in mining and other industries,</li> <li>- full-time and part-time employment and training; and</li> <li>- gender gaps such as for skilled trades and in wages and qualifications;</li> <li>- a description of any use of lands and waterbodies for economic activities in the study areas including commercial fishing, ecotourism and outfitters.” </li></ul>	<p>It is recommended that in section 9.2.1.1. clarity be provided regarding the following:</p> <ul style="list-style-type: none"> <li>- The economic activities in the study areas that are being requested, specifically, if they are they those that are relevant to the proposed Project;</li> <li>- How existing employment rates, economic well-being indicators and existing working conditions information in the study areas and impacted communities is relevant to the proposed Project;</li> <li>- How to address best and worst-case scenarios regarding the availability of skilled and unskilled workers over the proposed Project’s timeline (short, medium and long-term);</li> <li>- The jurisdiction (federal, provincial, municipal) regarding average salary and wage range in the same industry and others.</li> </ul>
ESDC - 04	9.2.1.2.1 Employment, (p.118).	<p>“The Impact Statement must:</p> <p>describe the potential changes in employment including:</p> <ul style="list-style-type: none"> <li>- an estimate of the direct, indirect and induced employment created at each phase of the Project, and during each calendar year over the lifespan of the Project (including also an estimate of the full-time</li> </ul>	<p>It is recommended that the Impact Statement also contain the following:</p> <ul style="list-style-type: none"> <li>- How, in addition to Indigenous Peoples, the employment estimates will impact specific categories of the population (e.g. equity deserving groups);</li> <li>- What compensation measures will be accessible to the proposed Project’s labour force during the Project’s</li> </ul>

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		<p>equivalent employment and part-time employment created at each phase of the Project, and during each calendar year over the lifespan of the Project);</p> <ul style="list-style-type: none"> <li>- an estimate of direct, indirect or induced income or wages and benefits, including a comparison for each phase of the Project and to the industry average, and regional and provincial average;</li> <li>- a description of the types of employment created at each phase of the Project, including skill and education requirements for the types of employment; and</li> <li>- an estimate of the ability of the local and regional labour market (including Indigenous participants in the labour market) to meet demand. To the extent possible, indicate the hiring targets and number of jobs potentially created for each Indigenous groups identified in the Indigenous and Engagement Partnership Plan.”</li> </ul>	<p>lifespan and once it is no longer in commission; this would include any programs that assist the proposed Project’s labour force to re-train for employment once the Strange Lake mine is de-commissioned;</p> <ul style="list-style-type: none"> <li>- In any estimate of induced workers, the categories of those workers i.e. temporary, permanent, foreign.</li> </ul>
ESDC - 05	9.2.1.3. Mitigation and enhancement measures, (p.120).	<p>“The Impact Statement must describe the mitigation and enhancement measures that will be implemented for all potential effects on economic conditions, including:</p> <p>With respect to the economic conditions of Indigenous Peoples, identify and describe opportunities for enhancing positive effects, including:</p> <ul style="list-style-type: none"> <li>- education, training and hiring practices that encourage employment and retention;</li> <li>- training, education, and scholarship programs that the proponent plans to support in order to improve employment opportunities, including participation in and contribution to local training networks. Specify the types of employment targeted by these programs, as well as the targeted clientele, such as local residents, Indigenous Peoples, and various relevant population groups;”</li> </ul>	<p>It is recommended that the Impact Statement indicate the proponent’s intention to access any government level programs that would assist Indigenous Peoples with respect to participating in the proposed Project’s labour force. This could potentially include programs offered by ESDC, such as the Indigenous Skills and Employment Training (ISET) Program (please refer to question 1 ESDC’s FAAR from November 3<sup>rd</sup>, 2023).</p>
ESDC - 06	9.2.2.2.1 Community	<p>“The Impact Statement must describe effects to community well-being for Indigenous Peoples, including:</p> <ul style="list-style-type: none"> <li>- changes that result from increased cost of living;</li> </ul>	<p>The following is recommended:</p> <ul style="list-style-type: none"> <li>- That clarification be provided regarding what changes are being referred to in section 9.2.2.2.1, with respect to</li> </ul>

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	Well-Being, (p.122, 123).	<ul style="list-style-type: none"> <li>- describe any positive effects on well-being (e.g. resulting from improved economic opportunities, increased access to services)."</li> </ul>	<p>community well-being. This will assist the proponent in describing the effects the proposed Project will have on Indigenous community's employment and income levels as well as access to social services;</p> <ul style="list-style-type: none"> <li>- How the proposed Project's positive effects with respect to well-being are defined and measured; and indicate what economic opportunities are being referred to for the proponent to describe.</li> </ul>

Insert as many lines as necessary.