

September 23, 2024

Draft Joint Impact Statement Guidelines for Strange Lake Rare Earth Mining Project

Comments by Mary Lou Harley, PhD

Thank you for this opportunity to submit a few comments concerning the adequacy of some of the requirements in the Strange Lake Rare Earth Mining Project Draft Joint Impact Statement Guidelines. The numbering is that of the relevant entry in the Guidelines.

1.1.4 I suggest that more be added to the stated requirement that
Where the proponent is of the opinion that the information is not required, it should contact the jurisdictions to confirm the rationale for not including it, prior to submitting the Impact Statement. The rationale for not including the information must also be provided in the Impact Statement.

I recommend that the rationale that would not be acceptable for failing to provide required information be given in this section. I offer these points:

- An area where research is inadequate to support a conclusion of safety cannot be dismissed as not required nor can it be misused to imply safety.
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- Where required information is not available on an issue of concern, it is not accepted as not required. Rather, it is to be acknowledged as required with an indication of the information needed to address the concern, and without use of misleading phrases such as "There are no known concerns."
- Where the required information relates to threats of serious or irreversible damage, lack of full scientific certainty is not an acceptable reason to not include the available information and the potentially effective measures for mitigation or prevention.
- Recognizing that research is on-going, the fact that a body of relevant scientific research has conclusions that differ from available government information cannot be used as a reason for failing to address the data and conclusions of that body of work.

4.1.4 Given the concerns already raised in public comments related to the inadequate study of and consideration for the Labrador culture, the caribou and the calving ground environment which will be impacted by the proposed road across Labrador planned for this project, all options should be assessed.

The list for alternative means analysis only has "route or corridor options for the access road between the mine site and the Labrador coast" While analysis is not limited to these options, routes within Quebec need to be highlighted here.

I recommend that added to this list, the proponent be directed to analyze all transportation mode options and alternative routes within Quebec from the mine to Sept-Îles.

4.2 This Newfoundland and Labrador requirements and information section raises the issue of "...the viability of potentially mining the Labrador portion of the "Main Zone REE deposit" in the future."

While the context is the placement of stockpiles, this reference to mining the Labrador portion is likely to generate questions and concerns requiring clarification by some authority other than the proponent.

7.1.2 I recommend that ambient radioactivity be added to "atmospheric environment" and terrestrial mammals be added to read "species....concern, terrestrial mammals and their habitat requirements."

General Comment:

For evaluating impacts and cumulative effects of toxins, the mode of contact is an important factor in dose and consequences: inhalation, ingestion, skin contact, blood stream contact via skin abrasion. One, some, or all of these modes could apply to a given VC. Additional consideration for external exposure to radioactive sources are distance from and total time of exposure to the source.