

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

Ministry/Agency			
Main contact and title		E-mail	
		Phone	

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. 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
TC-ATL-01	3.1.3	<ul style="list-style-type: none"> ○ <i>whether a request has been or will be submitted to Transport Canada’s Marine Safety Directorate for implementation of the Navigation Safety Assessment Program review process;</i> 	<p>The Proponent’s choice to construct a new port facility (floating dock) with an option to load at the dock or transfer to a moored vessel in deeper waters in Voisey’s Bay will require further information in the EIS, regardless of the option chosen for loading vessels.</p> <p>TC understands that the coastal area in Voisey’s Bay, NL is undeveloped and that the bay itself is uncharted. As little is known about the specific Voisey’s Bay area, Transport Canada (TC) suggests replacing the <i>identified wording</i> with the following:</p> <ul style="list-style-type: none"> ○ undertake a Navigation Safety Assessment Program (NSAP) review with Transport Canada’s Marine Safety and Security Directorate, integrated within the EIS and IA process.
TC-ATL-02	8.6.2.2 (second bullet, page 75)	<ul style="list-style-type: none"> ● <i>describe the effects on the navigability of waterbodies and watercourses, including navigation safety, from project components (e.g., water crossing structures) and from physical and hydrological changes to surface water;</i> ○ <i>describe consultation with regulators, waterway users, and Indigenous groups regarding navigability of waterways, issues raised and how they were addressed;</i> 	<p>Using the information previously provided to the Proponent, it would be helpful if the EIS flagged what components of the project (i.e. stream crossings and the floating dock) would require <i>Canadian Navigable Waters Act</i> approval. Suggest adding the following sub-bullet:</p> <ul style="list-style-type: none"> ○ identify those components of the project that will require an approval under the <i>Canadian Navigable Waters Act</i>.
TC-ATL-03	11.1	11.1 <i>Joints requirements and information</i>	Title of subsection seems incorrect.
TC-ATL-04	11.1.1 (third bullet on page143)	<ul style="list-style-type: none"> ○ <i>identify and justify the spatial and temporal boundaries for the effect assessment associated with accidents and malfunctions. The spatial boundaries identified for effects from potential accidents and malfunctions will generally be larger than the boundaries for the project effects alone, and may extend beyond Canada’s jurisdiction. For example,</i> 	<p>Please clarify what is meant by “... beyond Canada’s jurisdiction...”.</p> <p>TC understood from IAAC that the impacts from marine shipping were geographically limited to Voisey’s Bay (Gagnon, E., IAAC, email, March 22, 2024).</p>

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		<i>for potential accidents and malfunctions related to marine shipping, the effects assessment should go beyond the Voisey's Bay;</i>	
TC-QC-PPN-01	7.1.2	<i>...toutes les cartes qui doivent être présentées dans un format SIG et les fichiers de forme associés doivent être fournis en format numérique;</i>	Mauvais usage du terme « <i>format SIG</i> ». Par définition, un fichier implique nécessairement un format numérique. Un SIG n'est pas un format mais plutôt un système formé de plusieurs composantes comprenant, entre autres, des logiciels et des bases de données. Ici le commentaire ne semble viser que les fichiers de forme (shapefile) qui est le format d'origine d'ArcGIS alors que plusieurs autres formats peuvent être intégrés à un SIG.
TC-QC-PPN-02	8.6.2.2	<i>« décrire la consultation des autorités, des utilisateurs des voies navigables et des groupes autochtones concernant la navigabilité des voies navigables, les préoccupations soulevées et la manière dont elles ont été traitées; »</i>	Je propose « ... la navigabilité et l'usage des cours d'eau, ... ».
TC-QC-PPN-03	8.6.2.2	<i>Cela comprend les changements au débit de surface (quantité et moment), au niveau d'eau, à l'épaisseur ou l'étendue de la glace, à la sédimentation et au régime des canaux dans les cours d'eau, ainsi qu'au niveau d'eau dans les plans d'eau affectés;</i>	Redondance.
TC-QC-PPN-04	9.1.1	<i>l'usage courant et historique des terres pour des activités d'exploitation et d'exploration minière, et pour des carrières, y compris la présence de gisements connus de minéraux ayant une importance économique potentielle;</i>	Redondance

Insert as many lines as necessary.