



# Naskapi Nation of Nation Naskapi de KAWAWACHIKAMACH

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October 4, 2024

**Subject: Strange Lake Rare Earth Mining Project – Joint Impact Statement Guidelines-  
Draft Version**

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Dear Ms Therrien and Ms Rowe,

As you are aware, the Naskapi Nation of Kawawachikamach (“Nation”) received a consultation request on August 15 2024, pertaining to the project entitled Strange Lake Rare Earth Mining Project (“Project”) by Torngat Metals (“Proponent”) and AECOM. The following information (“Documentation”) was supplied by the Impact Assessment Agency of Canada (“IAAC”) and the Government of Newfoundland and Labrador (“GNL”) for the Nation to review:

- *Letter dated August 15 2024, entitled “Notice of Comment Period and Invitation to comment on the draft joint Impact Statement Guidelines and Draft Indigenous Engagement and Partnership Plan for the Strange Lake Rare Earth Mining Project”;*
- *Link to the draft version of the Joint Impact Statement Guidelines;*
- *Table of comments and key issues raised by the Nation and corresponding section in the Joint Impact Statement Guidelines;*
- *Draft Indigenous Engagement and Partnership Plan.*

Consequently, we understand that:

1. The Documentation enabling the Nation to provide informed comments has effectively been communicated within a reasonable time frame;
2. The final Project shall be substantially as described in the Documentation.



As you are also aware, the Project is located near the George River (*Musuwaaw-siipiiy*) and in the area of the calving and post-calving grounds of the George River caribou herd. The George River (*Musuwaaw-siipiiy*) was a significant fishing ground, gathering area and travel route, and there are undoubtedly archaeological artefacts and burial grounds all along the River. Among other potential impacts, the risk of radioactive elements, **Thorium and Uranium** leaching into the environment is a major concern for the Nation, and the Proponent should therefore provide valid justification for this Project. Additionally, caribou have always been the primary resource harvested by Naskapis and the potential impacts of this Project on caribou needs to be presented and examined in great depth. The George River caribou herd, unfortunately, is experiencing the biggest population crash ever registered, and their distribution has moved and decreased considerably, yet caribou and their calves continue to migrate directly in the Project area. Given the herd is in such a precarious state, the Nation is concerned that there will be extremely significant direct and indirect impacts on the herd and its habitat.

Furthermore, a significant amount of work needs to be done by the Proponent to adequately describe every component of the Project, including, but not limited to, potential impacts, proposed mitigation measures, alternatives for the Project and rehabilitation efforts, prior to the Project moving forward.

Subject to the foregoing, the Nation's detailed comments pertaining to the draft Joint Impact Statement Guidelines are attached hereto in **Appendix 1**.

Such position is also subject to the following terms and conditions:

1. No substantial modifications shall be brought to the Project, as described in the Documentation, without undertaking additional consultation with the Nation;
2. Any modification that affects our Aboriginal and treaty rights in Quebec and Labrador, shall be submitted to a new and distinct consultation process;
3. The position adopted by the Nation is entirely based upon the Documentation and may be modified where any other relevant issues are brought to the attention of our representatives;
4. Such position does not amount to consent to any future activities and shall not affect the Aboriginal and treaty rights of the Nation.

The Nation looks forward to continuing to develop, with the Proponent, IAAC and the GNL, a mutually beneficial relationship based on trust, transparency, and open communication.

Should you require any additional information, please do not hesitate to contact myself at [lmameanskum1@naskapi.ca](mailto:lmameanskum1@naskapi.ca) or Ms Lindsay Richardson at [richardson@atmacinta.com](mailto:richardson@atmacinta.com) or (514) 318-8954.

Best Regards,

<Original signed by>

Louise Mameanskum  
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c.c. (by email)

Chief Louise Nattawappio and Council members of the Naskapi Nation of Kawawachikamach  
Ms Stella Pien, Director General, Naskapi Nation of Kawawachikamach  
Mr Michel Bacon, Mining Liaison Officer, Naskapi Nation of Kawawachikamach  
Mr Billy Shecanapish, Environment Coordinator, Naskapi Nation of Kawawachikamach  
Ms Lindsay Richardson, Project Coordinator (Environment and Impact Assessment), Atmacinta  
Ms Jennifer Barnes, Government of Newfoundland and Labrador

## APPENDIX 1

### **1.0 CONTEXT**

Tornгат Metals Ltd. (“Proponent”), formerly Quest Rare Minerals Ltd, proposes to develop a rare earth mineral mine in northeastern Quebec approximately 235 kilometers from the Naskapi community of Kawawachikamach, for a duration of 30 years. The ore would be extracted via an open pit mine, processed and separated through a beneficiation plant and then shipped by truck on a newly constructed road approximately 160 kilometers in length east towards Voisey’s Bay, near Nain, after which it will be shipped by boat to Sept-Iles to be further refined (“Project”).

The proposed Project will have significant direct and indirect impacts on the Nation given the location of the proposed mine being near the George River (*Musuwaaw-siipi*), and within the calving and post-calving grounds of the George River caribou herd, in the heart of the important habitat identified by Naskapi Elders and land users called *Kawashukdaknabinnanouch*. Naskapis indeed still use this land to practice their traditional activities, although they tend to avoid the area during summertime to respect the caribou and their calves, in hopes that the young survive and repopulate the diminishing herd.

The document under review is the draft version of the Joint Impact Statement Guidelines issued by the Impact Assessment Agency of Canada (“IAAC”) and the Government of Newfoundland and Labrador (“GNL”). The main objective of this review and below comments by the Naskapi Nation of Kawawachikamach (“Nation”) is to ensure that they are comprehensive, and the Proponent is held to the highest standard and required to cover all aspects of concern and value to the Nation.

### **2.0 REVIEW AND COMMENTS**

Although the Nation expresses the below comments, pertaining to the draft Joint Impact Statement Guidelines for the Project, overall the Nation believes that they are quite detailed and complete. The Project will have significant direct and indirect impacts on the Nation and it seems as though the IAAC and the GNL have listened to these concerns and are in turn asking the Proponent to address them in the Impact Statement.

<b>Draft Impact Statement Guidelines</b>	<b>Nation’s Comment</b>
<b>Section 3 Project Description</b>	Project Location should include areas of archaeological potential.
(page 10)	“the Impact Statement shall identify: established and evolving developments in the mining of rare earth elements...” it should be clear to the Proponent that this includes current, ongoing and upcoming research in the

	industry to ensure the most up to date information, data and processes are applied.
<b>Section 3.1.4 Workforce requirements</b>	The workforce requirements should include the Proponents methods to attract Indigenous employees, provide accessible training session, and to retain Indigenous employees.
<b>Section 4.1.3 Alternatives to the Project</b>	The Proponent should also consider the possibility of a delayed start to the Project, based on social acceptability and when the George River caribou herd’s population increases to reach a steadier number of species. This Project may gain more social acceptability if the Proponent is willing to realize it when the George River caribou herd will be at a level that will ensure a certain resilience to the impacts of the Project.
	Alternative energy sources should be presented in detail by the Proponent.
<b>Section 7.2 Selection of Valued Components</b>	The valued components (“VC”) in this section should be more explicit. The Proponent should avoid grouping species and other components into one single VC.
<b>Section 7.6 Cumulative Effects Assessment</b> (page 55)	“past, existing, or future mining activities or projects” this will be difficult to frame as future mining and mining exploration is sometimes difficult to identify. “mineral exploration activities near the Project;” how will the Proponent define the term ‘near’ to the Project? To strengthen the content presented in this section, and to continue to address future cumulative impacts, the Nation suggests that the Proponent be required to draft a Cumulative Effects Assessment Plan, which would be similar to an Environmental Protection Plan and/or Closure and Rehabilitation Plan, that is updated every five years to reflect accuracy and the real-life situation.
<b>Section 8.3 Geochemistry of mined or excavated materials</b> (page 61)	“provide estimates of the potential for all materials...to be sources of acid drainage, neutral mine drainage, metal(loid) leaching (including radionuclides), and/or radioactivity..” The Proponent should also include what resulting impacts this would create on the surrounding environment, flora and fauna.

<p><b>Section 8.5.2 Effects to the atmospheric, acoustic, and visual environment</b></p>	<p>In the section about night-time illumination levels “describe night-time illumination levels during different weather conditions and seasons” the Proponent should assess the impacts on wildlife, migration patterns, and migrating animals as well.</p> <p>Furthermore, all sound and vibrations should be analyzed in terms of what the caribou and wildlife can sense as they will be regularly and continuously affected by noises and vibrations felt in the ground.</p>
<p><b>Section 8.7.2 Effects to vegetation, riparian and wetland environments</b></p>	<p>The Proponent has stated to the Nation that it plans to construct a man-made wetland to act as a filter at the mine site. therefore, the potential impacts/repercussions of manufacturing a wetland should be integrated in their Impact Statement, particularly as compared to surrounding waterbodies, current wetlands, and local flora and fauna.</p>
<p><b>Section 8.10 Terrestrial wildlife and wildlife habitat</b></p>	<p>The Proponent should be asked to identify all terrestrial species present or potentially present in all Project components (surrounding the mine site, the road and the port facility). Indeed, there should be a strong focus on caribou, but the Impact Statement should provide for a comprehensive analysis by the Proponent of all the species living (with a special status or not), utilizing or passing through any impacted area (including small mammals, amphibians, reptiles, etc.).</p>
<p><b>Section 8.10.2.2 Effects to terrestrial wildlife and their habitat - Federal requirements and information</b></p>	<p>The Impact Statement must “describe the potentials effects from all phases of the Project on terrestrial wildlife species of importance to Indigenous Peoples and on their habitat”, yet according to Indigenous Peoples, all species have their own significant role to play and are important.</p> <p>Species must therefore be treated separately, not pooled together into one VC.</p>
<p><b>Section 15 Follow-up Programs and Plans</b></p>	<p>This section should include a request for a Cumulative Effects Assessment Plan and a Wildlife Management Plan.</p>

### ***3.0 CONCLUSION***

The Project is located in a pristine environment that will be significantly and permanently disturbed, whilst directly and indirectly impacting the local Native communities. The Nation must consider that the Project will certainly have impacts during its mine life but may also have long lasting impacts on the environment and on future generations, and particularly the George River caribou herd and the George River watershed.

The Nation believes that the draft version of the Joint Impact Statement Guidelines in general, are very good and it supports the level of detail requested by the IAAC and the GNL for this Project. Overall, the Nation is satisfied with the content and quality of the draft Joint Impact Statement Guidelines.