

Appendix N

Kami Project Public Consultation Plan

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August 2012

1. PUBLIC CONSULTATION PLAN – KEY DRIVERS

Alderon Iron Ore Corp. (“Alderon”) is committed to operating within a sustainable development framework. This means integrating economic, environmental and social considerations in the decision-making processes relating to the Kami Project (the “Project”).

One of the key principles of sustainable development is to consult with stakeholders (members of the public, communities and associations) who may be affected by the Project in order to build and maintain positive, long term and mutually beneficial relationships.

The principles guiding this Public Consultation Plan are set out in Alderon’s *Communities Relations Policy*:

- Engage stakeholders through meaningful, transparent and respectful communication and consultation;
- Value, acknowledge and give consideration to the cultural diversity, unique traditions and the needs and aspirations of local peoples communities and other stakeholders;
- Act responsibly at all times;
- Develop relationships with local community leaders and provide timely responses to their communications;
- Understand, acknowledge and respond to the concerns of local people, communities and other stakeholders; and
- Provide Project information and updates on a regular basis.

2. PUBLIC CONSULTATION PLAN – KEY STRATEGIES

Alderon has adopted a ‘life of Project’ approach to public consultation. The main objective of the consultation framework outlined in this Plan is to implement a flexible, comprehensive and coordinated strategy for informing, engaging and obtaining feedback from a diverse range of stakeholders. Alderon will involve stakeholders at the earliest possible stage in the planning of the Project and continue consultation throughout the construction and operations phases in order to build and maintain positive, long term and mutually beneficial relationships throughout the life of the Project

Specifically, the key strategies of the Plan are to:

- Provide timely and accurate Project information and updates as required;
- Deliver information in a form that is clear and easy to understand;

- Engage stakeholders throughout the planning process and during the life of the Project;
- Identify issues of concern with the Project and respond in a timely and responsible manner;
- Improve the consultation process and the Kami Project by incorporating stakeholder feedback and input, as well as public ideas and opinions;
- Identify, remove and prevent barriers to participation in public consultation by individuals with disabilities;
- Adapt project design, and adjust construction and operations activities where possible, to avoid and mitigate adverse environmental effects; and
- Maintain an inventory of issues identified during the public consultation process and report on how issues and concerns raised by stakeholders have been addressed.

3. STAKEHOLDERS

Preparation for public consultation involves the identification of the legal and policy requirements for public consultation. Alderon is committed to act in accordance with existing commitments and processes respecting public consultation, including any commitments and processes imposed on Alderon as a requirement of legislation or policy.

To ensure all stakeholders are given the opportunity to participate in the consultation process, stakeholder identification will include the following key community groups:

- Residents of communities in proximity to the Project -- Labrador City, Wabush, Fermont and Sept-Îles;
- Municipal governing bodies;
- Local businesses;
- Potential municipal, private, and academic partners;
- Non-governmental organizations (NGOs) and other community groups and associations; and
- Self-identified stakeholders (e.g., participants at consultation activities);
- Relevant regulatory agencies; and
- Print, broadcast and news media outlets.

A preliminary stakeholder list can be found in Appendix A. To facilitate communication with relevant stakeholder groups throughout the life of the Project, Alderon will maintain a current stakeholder list in its database and update as appropriate throughout the life of the Project. It is expected that the stakeholder list will be dynamic and will be modified and expanded throughout the life of the Kami Project.

4. IMPLEMENTATION

Alderon will employ a range of public consultation initiatives to ensure that stakeholders participate appropriately in consultation activities. Information will be disseminated through digital and print media, including Alderon’s website, email, newspaper advertisements and newsletters.

Participation levels will range from information sessions to active involvement of stakeholders in the decision-making process. The following sections identify each of the activities and the groups responsible for carrying out those activities and their objectives.

4.1 Participation on Multi-Stakeholder Committees

Alderon will participate on multi-stakeholder committees as appropriate and is currently an active member of two multi-stakeholder groups:

4.1.1 Labrador West Regional Task Force

The Labrador West Task Force is a social development group comprised of local mining companies, municipalities and governments. It was established in February, 2012 and meets approximately 4 times a year. The group identifies ways in which multiple stakeholders may collaborate to manage impacts upon the communities of Labrador City, Wabush and Fermont arising from the rapid growth of the local mining industry. Participants are decision-making representatives of the respective stakeholder groups, and they operate at a strategic level to develop solutions and plans for addressing the issues that are identified. The Task Force operates in conjunction with the Labrador West Community Advisory Panel, which provides information to the Task Force about issues and opportunities for sustainable development in the adjacent communities.

4.1.1.1 Participants

Community Sector	Affiliation
Area Municipalities	Town of Wabush
	Town of Labrador City
	Town of Fermont

Community Sector	Affiliation
Business/Industry	IOC
	Alderon Iron Ore Corp.
	Cliffs Natural Resources
	Labrador Iron Mines
	New Millennium Iron Corp.
	ArcelorMittal
Federal Government	Federal Government, Atlantic Canada Opportunities Agency
NL Government	NL Department of Intergovernmental and Aboriginal Affairs
	Executive Council - Labrador Affairs Office (LAO)
	NL Intergovernmental Secretariat
	NL Department of Municipal Affairs
	NL Department of Natural Resources

4.1.2 Labrador West Community Advisory Panel

The Labrador West Community Advisory Panel (CAP) is a community-led social development group comprised of mining companies, municipalities, the Newfoundland and Labrador Government, Innu Nation, local interest groups, education institutions, an environmentalist, and organizations involved in health care, social services and community well-being. CAP was initiated by IOC in in 2006, and is co-chaired by IOC and Cliffs Natural Resources. CAP meets 4 times a year and provides a consultative forum for Labrador West stakeholders to identify issues and opportunities for sustainable development. Issues discussed by CAP include affordable housing, childcare, health care services, recruitment and retention (non-mining), and community infrastructure. CAP works in conjunction with the Labrador West Task Force by providing information about the issues and opportunities identified by the Panel.

4.1.2.1 Stakeholders and Participants

Community Sector	Affiliation
Area Municipality	Town of Labrador City/Labrador West Ministerial Association
Area Municipality	Town of Labrador City/Labrador West Housing & Homelessness Coalition

Community Sector	Affiliation
Business/Industry	Cliffs Natural Resources
	AMEC Consulting
	Alderon Iron Ore Corp.
	IOC
Community Group	Labrador West Status of Women
	Association Francophone du Labrador
Education	Labrador School Board
Health	Labrador Grenfell Health
Police Services	Royal Newfoundland Constabulary

4.2 Participation in Follow-up and Monitoring Committees

Alderon will participate in Project follow-up and monitoring activities including the establishment of committees, as appropriate, with the communities potentially affected by the mine, including Labrador City, Wabush, Fermont and Sept-Îles.

4.3 Council and Staff Information Briefings

Alderon will provide regular briefings to the Town Councils of Labrador City, Wabush, Fermont and Sept-Îles to ensure that these municipalities are informed of Project progress on a timely basis. Alderon will also meet with Town Councils on request to discuss issues of particular concern.

4.4 Stakeholder Consultation Events

Alderon will engage community stakeholders throughout the life of the Project by holding regular public information sessions in communities to present Project-related information and discuss and respond to community issues and concerns. Public information sessions will be held in an open house format to allow participants to access information and communicate concerns in the most convenient manner. Alderon will also document and respond to concerns and issues raised during these events. Feedback will be collected through a combination of an Exit Survey and handwritten notes by Alderon personnel and consultants.

4.5 Consultation with Educational and Training Institutions

Alderon will participate in focus groups conducted by educational and training institutions such as the College of the North Atlantic and Memorial University to communicate Alderon's expected human resource requirements during the Project's construction and operation periods.

4.6 Information Briefings with Regulators

Alderon will continue to engage relevant Provincial and Federal Government regulators through information briefings about the Kami Project as required. Briefings will include information updates about the Kami Project and will also address issues relevant to the departments on an ongoing basis. Please refer to Appendix A for a list of relevant regulators.

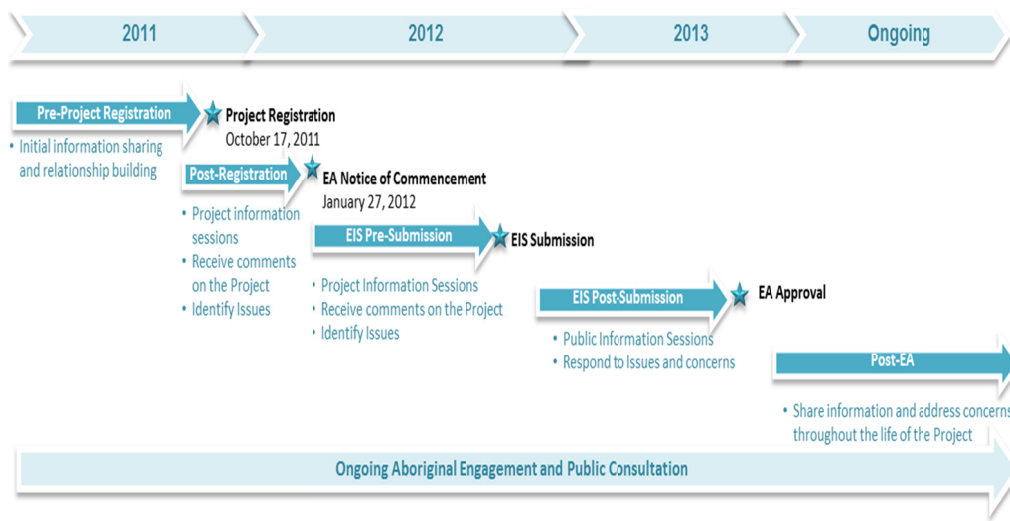
4.7 Newsletters

Alderon will publish a Kami newsletter twice a year to disseminate information to stakeholders, including residents of neighbouring communities. The Kami newsletter will announce upcoming public consultation events, inform stakeholders of developments in the Kami Project relevant to their communities and demonstrate how Alderon is benefitting communities.

4.8 Media Relations

Alderon will continue to engage the media as the Project unfolds. Newspaper, radio and cable television advertisements will be used to announce upcoming public consultation events and disseminate important information about the Project to the public. As required, designated Alderon spokespersons will participate in radio or television interviews to provide information about the Project and address issues and concerns raised by the public.

5. SCHEDULE



6. ISSUES IDENTIFICATION, TRACKING AND REPORTING

Issues identification and documentation is an essential component of the development of the Kami Project as it informs Project planning. Alderon is committed to ensuring that the Kami Project is developed collaboratively with the communities of Labrador City, Wabush, Fermont and Sept-Îles. There will be various opportunities for communities and other stakeholders to provide feedback during consultation activities. All feedback obtained throughout the consultation process will be documented and considered. The methods of collecting, organizing and documenting feedback are identified below.

6.1 Issues Tracking

All comments received as part of the consultation program will be documented in an issues identification and documentation database. All communications will be entered into the database and organized by issues to which they are relevant. The database allows reports to be generated by issue so that relevant stakeholder feedback can easily be identified and used to inform the development of the Kami Project.

6.2 Evaluation and Feedback Mechanisms

Following any consultation activity feedback from stakeholders will be entered into the database. Alderon personnel will evaluate the feedback from consultation activities and develop ideas and plans of how to address issues raised and incorporate suggestions into the Project, as appropriate. In each case, Alderon will consider the appropriate method to communicate the outcomes of the evaluation process to the relevant stakeholders.

Appendix A Kami Project Stakeholder List

Category	Sub-Category	Stakeholder group
Government	Newfoundland and Labrador (NL) Government	<ul style="list-style-type: none"> Executive Council Department of Advanced Education and Skills (DAES) Department of Environment and Conservation (DOEC) Department of Government Services and Lands (DGSL) Department of Health and Community Services (DHCS) Department of Innovation, Business and Rural Development (DIBRD) Department of Justice (DOJ) Department of Municipal Affairs (DOMA) Department of Natural Resources (DNR) Department of Tourism, Culture and Recreation (DTCR) Department of Transportation and Works Intergovernmental and Aboriginal Affairs (IGAA) Provincial Archaeology Office Service Newfoundland and Labrador Women's Policy Office
	Federal Government	<ul style="list-style-type: none"> Aboriginal Affairs and Northern Development Canada (AANDC) Atlantic Canada Opportunities Agency (ACOA) Canadian Environmental Assessment Agency (CEA Agency) Canadian Transportation Agency (CTA) Environment Canada (EC) Fisheries and Oceans Canada (DFO) Major Project Management Office (MPMO) Privy Council Office Transport Canada Port of Sept-Îles
	Québec Government	<ul style="list-style-type: none"> Ministère du développement durable, de l'environnement et des parcs (MDDEP) Ministère des ressources naturelles et de la faune (MDRNF) Secrétariat aux affaires autochtones (SAAA)
Municipal	NL Municipal	<ul style="list-style-type: none"> Town of Wabush Town of Labrador City
	Québec Municipal	<ul style="list-style-type: none"> Town of Fermont City of Sept-Îles

Category	Sub-Category	Stakeholder group
Community Groups	Environment	<ul style="list-style-type: none"> • Conseil régional de l'environnement de la Côte-Nord • Corporation de protection de l'environnement de Sept-Îles • Le Mouvement citoyen de Fermont
	Economic Development	<ul style="list-style-type: none"> • CLD Caniaspicau • Conseil de développement économique d'Uashat mak Mani-Utenam • Hyron Regional Economic Development Board • Innu Business Development Centre • Labrador West Chamber of Commerce • Labrador West Employment Corporation • Labrador West Tourism Corporation • Newfoundland and Labrador Organization of Women Entrepreneurs (NLOWE) • Town of Labrador City Economic Development Department • Women in Resource Development Corporation
	Outfitters and Recreation	<ul style="list-style-type: none"> • Cabin Owners • Newfoundland and Labrador Outfitters Association • White Wolf Snowmobile Club
	Education, Social Services, and Health	<ul style="list-style-type: none"> • College of the North Atlantic • CSSS de L'Hematite • Labrador City Municipal Enforcement • Labrador Grenfell Health • Labrador Institute Memorial University, LW Campus • Labrador West Status of Women • Labrador West Aboriginal Friendship Association • Labrador School Board • Newfoundland and Labrador Housing Corporation • Provincial Advisory Council on the Status of Women • Royal Newfoundland Constabulary • Wabush Municipal Enforcement Officer