

4 ABORIGINAL ENGAGEMENT AND PUBLIC CONSULTATIONS

The reader is cautioned that the Air Quality data discussed in this chapter derives from the data presented in the federal report (Volume 2 Supporting Study E).

The Proponent has deployed considerable effort to develop positive and fruitful relationships with the various stakeholders, in particular with Aboriginal groups of Québec and Labrador. The Proponent has established ongoing consultation/discussion mechanisms in order to maintain these positive relationships and to respond to the requests of Aboriginal groups in a timely manner. The following chapter describes the relationships and discussions held with:

- Government departments and agencies;
- Aboriginal groups; and
- Other stakeholders and the public.

For each, a short report is presented on:

- the ongoing engagement mechanisms established by HML (TSMC) 1, in particular the IBAs signed with Aboriginal groups, through which consultation for the Howse Project took place;
- the consultation process prior to and leading to the EIS; and
- the EIS consultations process itself.

It is important to understand that the Howse Project is being inserted within a brownfield context, where mining activities (exploration and operations) are ongoing. Although HML is the Proponent, TSMC’s personnel has been the Project face interacting with the various stakeholders. Accordingly, the local population associates the Project with TSMC (primarily), and thus, it is difficult to dissociate the Howse Project from the ongoing DSO Project. For its part, Labrador Iron Mines (LIM) obtained in April 2015 Court protection under the *Companies’ Creditors Arrangement Act* (CCAA) and has not carried out mining operations since 2014.

4.1 GOVERNMENT DEPARTMENTS AND AGENCIES

HML has provided Project overview information to, and corresponded and met with, the provincial and federal governments on various occasions in the course of the EIS process (Table 4-1). Most of the meetings took place before March 2014, just before the submission of the Project Registration, and during the preparation of the Final EIS in summer and fall 2015. Ongoing discussions also occur with some government departments, especially those who act as regulators for the EIS.

Table 4-1 Meetings and Discussions with Government Agencies

GOVERNMENTS / AGENCIES	MEETING LOCATION AND DATE	MEETING FOCUS
TSMC Meetings		
Newfoundland and Labrador Department of Environment and Conservation	St-John’s, January 22, 2014	Presentation of the Howse Property Project

¹ For the purposes of this specific chapter, while HML is the Proponent, TSMC is the company acting on behalf of HML for day-to-day operations and interactions with stakeholders. TSMC is also the company with which agreements have been signed with Aboriginal groups.

GOVERNMENTS / AGENCIES	MEETING LOCATION AND DATE	MEETING FOCUS
Newfoundland and Labrador Water Resource Management Division	St-John's, January 22, 2014	Presentation of the Howse Property Project
Newfoundland and Labrador Pollution Prevention Division	St-John's, January 22, 2014	Presentation of the Howse Property Project
Newfoundland and Labrador Intergovernmental and Aboriginal Affairs Secretariat	St-John's, January 22, 2014	Presentation of the Howse Property Project
Canadian Environmental Assessment Agency (CEAA)	Halifax, January 23, 2014	Presentation of the Howse Property Project
Québec Ministère des Ressources naturelles du Québec	Québec, January 15, 2014	Information meeting on: <ul style="list-style-type: none"> ○ Status of the DSO project including latest developments ○ Introduction to the Howse Property Project
Québec Ministère des finances et de l'économie	Québec, January 15, 2014	Information meeting on: <ul style="list-style-type: none"> ○ Status of the DSO project including latest developments ○ Introduction to the Howse Property Project
Québec Secrétariat of Développement Nordique	Québec, January 15, 2014	Information meeting on: <ul style="list-style-type: none"> ○ Status of the DSO project including latest developments ○ Introduction to the Howse Property Project
Newfoundland and Labrador Department of Natural Resources Assistant Deputy Minister	Toronto (PDAC), March 4, 2014	Discussions on the Howse Property Project

In addition, a draft copy of the Project Registration was sent out and a comment period of 30 days was provided to the following government departments and agencies:

- Canadian Environmental Assessment Agency (CEAA);
- Newfoundland and Labrador Pollution Prevention Division;
- Newfoundland and Labrador Water Resource Management Division;
- Newfoundland and Labrador Department of Environment and Conservation; and
- Newfoundland and Labrador Wildlife Division.

Comments received via the CEAA were included in the guidelines for the EIS by the CEAA. In addition, several discussions were held with the CEAA to address questions on the EIS process and expectations (June 30th and October 8th in Halifax, and November 12th 2014, as well as May 22nd and 26th, June 1st and 11th, July 24th and September 14th 2015 by phone) and a site visit on May 14-15 2015. Since the beginning of the EIS process, email correspondence with CEAA has been frequent, almost on a weekly basis, to ensure that all reviewers (Aboriginal groups and government agencies) obtain the information in a timely manner, and to ensure that the EIS duly responds to requirements. Questions from CEAA and three First Nations

(IN, NIMLJ and NNK) were received following the submission of the draft EIS, HML has provided answers to groups individually.

It is important to note that HML has established long term relationships with the federal, NL and Québec governments, and that discussions are held frequently with various departments, depending on the issue, more particularly with the Environmental Assessment Division of the NL Environment and Conservation Department. These meetings concern TSMC’s operation generally, and the Howse Project has been referred to as a joint venture with LIM. Examples of recent meetings include:

- October 17, 2014, Minister of Transport, the Honorable Lisa Raitt;
- October 17, 2014, Minister of Infrastructure, Communities and Intergovernmental Affairs and Minister of the Economic Development Agency of Canada for the Regions of Québec, the Honorable Denis Lebel;
- October 27, Minister of Native Affairs (Québec), Mr. Geoffrey Kelly;
- November 3, 2014, Minister of Natural Resources, Mr. Pierre Arcand ;
- December 17, 2014, Minister of Mines (Québec), Mr. Luc Blanchette;
- January 8, 2015, Deputy Minister, Plan Nord Secretariat, Mr. Robert Sauvé; and
- January 12, 2015, Office of the Premier of Québec.

In the context of the EIS process, specific government organizations and elected officials of Québec and Labrador were consulted by letter in October, 2014, informing them of the ongoing EIS consultation process and asking whether they had concerns regarding the Howse Project or suggestions for mitigation measures (Table 4-2). The decision to contact them by letter was justified by the fact that the Project will maintain the jobs and contracts associated with TSMC’s DSO project.

No responses to the letters sent had been received as of November 2015. An example of the letters sent can be found in Volume 1 Appendix IX.

Table 4-2 Elected Officials in Newfoundland and Labrador and Québec Consulted on the Howse Project - October 14 2014

FUNCTION / MINISTRY	NAME	COMMENTS RECEIVED
Member of Parliament, Labrador	Ms. Yvonne Jones	None
Member of the House of Assembly, Labrador West	Mr. Nick McGrath	None
Minister of Labrador and Aboriginal Affairs	The Honorable Keith Russell	None
Elected member of Parliament, Manicouagan, Québec,	M. Jonathan Genest-Jourdain	None
MNA for Duplessis, Québec	Ms. Lorraine Richard	None
Prefect, Caniapiscau MRC	Ms. Lise Pelletier	None
Prefect, Sept-Rivières MRC	Ms. Violaine Doyle	None

The Project will also eventually require a range of additional environmental permits and other authorizations. The post-EIS permitting process will provide the opportunity for relevant regulatory authorities to receive and review additional Project design information, and to establish specific terms and conditions to avoid or reduce environmental effects. The proponent and/or its contractors will identify,

apply for and adhere to all required permits and other authorizations that are required for Project Construction and/or Operations.

In the case of benefits to the Province of NL, TSMC will be responsible for compliance with all applicable obligations under its Newfoundland and Labrador Benefits Plan (NLBP). For instance, 60% of the labour force will come from NL, as is currently the case for the DSO project.

In addition, the NLBP includes a Women’s Employment Plan (WEP) (NML, 2010). This plan, which was prepared for TSMC’S DSO project (Volume 1 Appendix X), will also apply to the Howse Project. The WEP includes provisions relating to: “a communications strategy; targets for women’s employment and access to business opportunities; an implementation plan; leadership and accountability mechanisms; a monitoring, reporting and implementation schedule; and periodic evaluations and amendments. It also contains important goals for education and training, as well as for the recruitment and retention of Aboriginal women” (NML, 2010). The WEP also includes an implementation plan, accountability mechanisms, and monitoring measures (NML, 2010).

4.2 ENGAGEMENT AND COMMUNICATIONS WITH ABORIGINAL GROUPS

The Proponent is committed to ensuring that Aboriginal communities and organizations are consulted appropriately on the proposed Project and to meaningfully accommodating their rights and interests as required by Section 35 of the *Canadian Constitution Act (1982)* and as per IBAs signed with them. What follows describes the Proponent’s efforts to interact with the potentially affected Aboriginal groups so as to integrate their concerns into the planning process for the Howse Project. Table 4-3 provides a list of the Aboriginal groups consulted for the EIS.

Table 4-3 Aboriginal Groups Consulted for the EIS

ABORIGINAL GROUP	CONTACT INFORMATION
Nation Innu Matimekush-Lac John	Chief Réal Mackenzie C.P. 1390 Schefferville, QC G0G 2T0 (418) 585-2601
Naskapi Nation of Kawawachikamach	Chief Noah Swappie 1009 Naskapi Road Kawawachikamach Nuchimiyuschiy, Québec P.O. Box 5111 G0G 2Z0 (418) 585-2686
Innu-takuaikan Uashat mak Mani-Utenam	Chief Mike Mackenzie 265 Boul. des Montagnais Uashat, QC G4R 5R2 (418) 962-0327
Innu Nation	Grand Chief Anastasia Qupee Innu Nation PO Box 119

ABORIGINAL GROUP	CONTACT INFORMATION
	Sheshatshiu, NL (709) 497-8398
NunatuKavut Community Council	President Todd Russell PO Box 460 Station C 370 Hamilton River Rd. Happy Valley-Goose Bay, NL A0P 1C0 (709) 896-0592

In the context of the EIS, actions were taken to ensure due participation of potentially affected Aboriginal groups, who are subjected to mining activities and their related effects on a daily basis. These groups have also signed IBAs with both TSMC and LIM, and it is in the LIM IBA that provisions for the Howse Project have initially been made.

The Proponent has been engaged in Project-related consultation activities with the aforementioned groups, through which it has provided information on the proposed Project in order to identify and discuss the nature of any associated interests, questions or concerns on the part of each group, for consideration as Project planning proceeds.

Based on TSMC’s previous work with the concerned Aboriginal groups, HML has determined that the groups most impacted by the planned activities for the Howse Project are the NIMLJ, NNK and ITUM. Of these, members of the NNK and the NIMLJ actively use the land near the Howse Property (Irony Mountain / Kauteitnat and the Howells River valley).

ITUM is also informed on the Project, as two traplines pertaining to ITUM families will be affected by the mining activities of the Howse Project. Indeed, family trapline holders in the area around the Howse Project (Trapline #211 – Jean-Marie Mackenzie family; and Trapline #207 – Louis (Sylvestre) Mackenzie family) (Figure 4-1) are ITUM members, and the area near the Kauteitnat Mountain has been identified as sensitive.

In contrast, members of the Innu Nation (IN) and NCC are not known to currently use the land near the Howse Project. However, given the agreements signed with these groups (Section 7.5.1.1), both the IN and NCC were consulted within the EIS process. In particular, IN has, under the Tshash Petapen/New Dawn Agreement, a recognized *Economic and Hydroelectric Major Development Impacts and Benefits Area* in the area of Labrador where the Project is located, and the NCC have land claims of the same area. Given the distance of these populations from the Project site, as well as the information available regarding their actual use of this area (Section 6.9.9), these two groups were consulted early in the EIS process: in the context of the project guidelines via the CEAA, and by letter for the EIS. The IN has prepared an extensive list of questions relative to the draft EIS that the Proponent has duly answered (Section 4 below for a summary). A meeting was held with IN at the end of October 2015 to discuss the Howse Project and related IN concerns.

To ensure that the measures proposed were satisfying for the local population dealing with mining activities on a daily basis, a validation session was held with members of NIMLJ and NNK. The purpose was to ensure that they concurred with the proposed mitigation measures, and that they could be heard regarding other measures that they would find useful in alleviating the Project’s potential effects. The results of these discussions are presented in Section 4.3 below.

Overall, in keeping with the spirit of the agreements signed, consultations were carried out with all five groups, but were more extensive with the three former groups (NIMLJ, NNK, ITUM), and this will be applicable to the proponent's longer term engagement activities.

4.2.1 Agreements with Aboriginal Groups

Integrating the environmental and human components of sustainable development in mining is important for HML. In keeping with the founding principles of Tata, HML is committed to working with and supporting Aboriginal communities impacted by its activities.

As a result of its past and ongoing presence and development activities in Labrador West and Québec, HML has established respectful and mutually beneficial relationships with Aboriginal communities and organizations in Labrador and Québec.

In relation to the Howse Project, the following agreements have been signed:

- LIM
 - IN: IBA dated July 17, 2008
 - NNK: IBA dated September 2, 2010
 - NIMLJ: IBA dated June 6, 2011
 - ITUM: IBA dated February 13, 2012
 - NCC: Economic Partnership Agreement, dated December 14, 2012
- HML
 - NNK: IBA dated June 10, 2010
 - NIMLJ: IBA dated June 6, 2011
 - IN: IBA dated November 11, 2011
 - ITUM: IBA dated February 9, 2012
 - NCC: Cooperation Agreement dated August 14, 2013.

Initially, the responsible development of the Howse Project was provided for in the LIM agreements. However, given the change in circumstances in April 2015 whereby HML acquired 100% of the Howse deposit and LIM obtained Court protection under the CCAA, it is the intention of HML to incorporate the Howse deposit into its agreements with Aboriginal groups. As such, the same commitments made as part of HML DSO Project will apply for the Howse Deposit. These agreements provide for mechanisms and measures for full and effective participation and involvement of said groups in the planning and implementation of the Howse Project so that they obtain socioeconomic benefits, their traditional activities and knowledge are respected, and environmental effects are minimized. These provisions include:

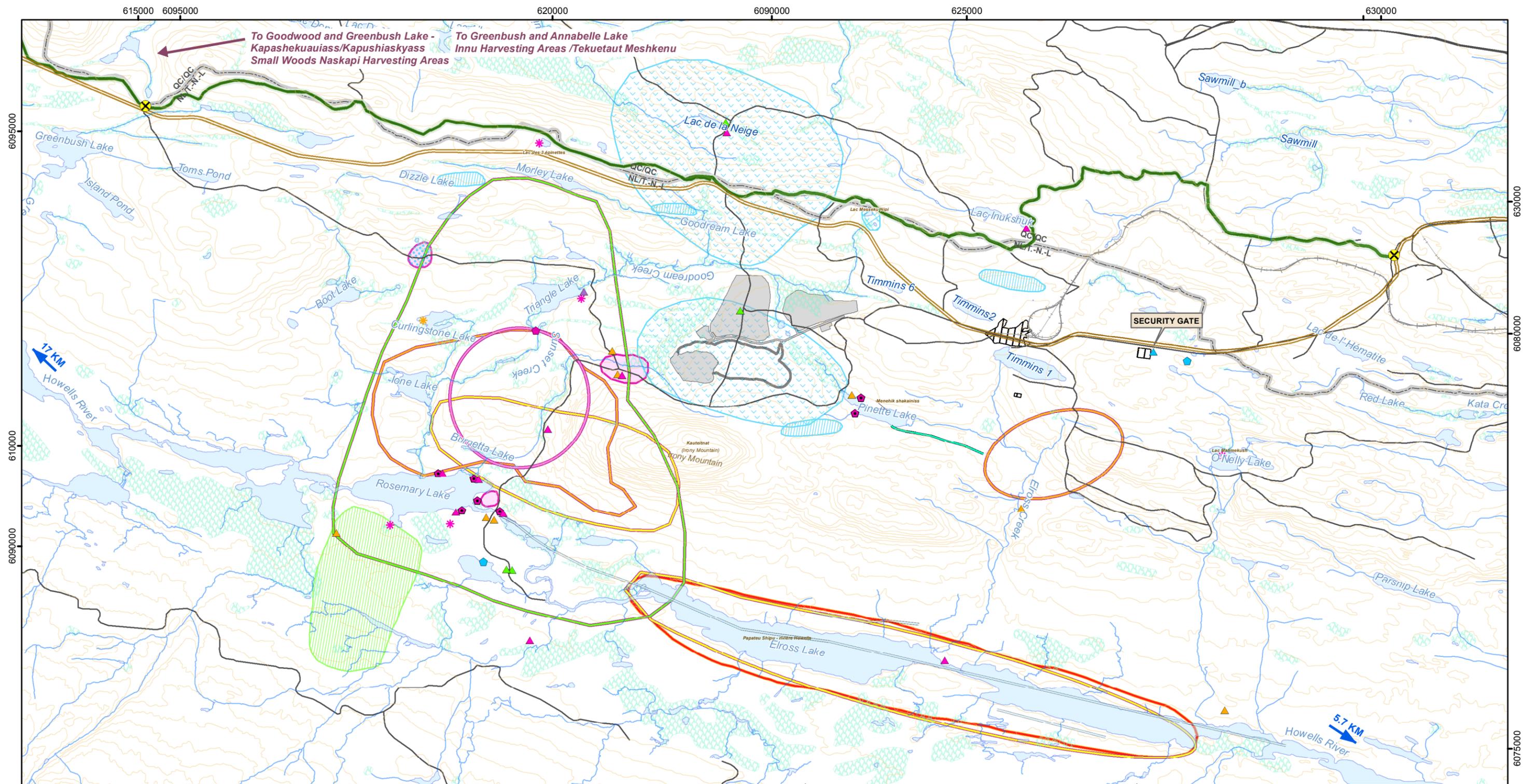
- Aboriginal employment targets and training measures during the Construction and Operation phases;
- Targets and processes that encourage and facilitate the participation of Aboriginal businesses in contracting opportunities;
- Program dollars for priority areas identified by communities, which vary from one agreement to the next but which generally include:
 - capacity-building;
 - economic development;
 - infrastructure;
 - support for traditional activities;
 - training;
 - education;
 - arts and music;

- recreation.
- Revenue-sharing;
- Environmental monitoring; and
- Accommodations for culturally- and gender-specific needs.

HML is committed to fully respecting these confidential agreements.

Proper implementation is essential in meeting the objectives of these agreements, which is why timely and open communication, reporting, and support and involvement in the joint management of matters important to the communities through implementation committees and a Community Health, Safety and Environment committee are vital aspects of positive relationships. HML has already begun integrating these activities into its ongoing engagement activities for the DSO Project, and using them throughout the consultation process for the Howse Project EIS.

Support for local infrastructure, training, education, environmental protection, economic development, traditional activities, arts and music, and revenue sharing have been and will continue to be provided by HML. Furthermore, there are clear measures identified for safe, healthy, respectful and culturally cognizant work conditions and arrangements as these relate to counselling, transportation, rotation schedules, cultural leave, harvesting restrictions by workers staying at Camp and country food.



LEGEND		Harvesting Roads		Access Roads		Infrastructure and Mining Components		Basemap	
Camps/ Tents	Innu Harvesting Areas	Winter Skidoo Trail	Haul Road to DSO Area 4	Railroad	Contour Line (50 ft)	Proposed Howse Pit	Provincial Border	Watercourse	Water Body
▲ Naskapi	○ Hunting Area	ATV Road - Skidoo Trail	Timmins - Kivivik Bypass Road	Howse Infrastructure	Footprint	Existing DSO Project Infrastructure	Wetland		
▲ Innu	○ Goose Hunting	Old Innu Harvesting Site	Other Land Use Road	Land User Crossing					
▲ Unknown Owner	○ Porcupine Hunting	Caribou Killing Site							
▲ Naskapi - Old	○ Firewood Cutting	Old Innu Harvesting Areas							
▲ Innu - Old	○ Camp Area	Old Partridge Area							
Innu Harvesting Locations	Naskapi Harvesting Area	Old Goose Hunting							
◆ Beaver Hunting	○ Goose Hunting	Old Berry Picking Area							
◆ Goose Hunting		Old Camp Area							
◆ Fishing		Old Naskapi Harvesting Area							
Naskapi Harvesting Spot		Old Camp Area							
★ Fishing									

*Hydronyms are oriented along the direction of water flow

FILE, PROJECT, DATE, AUTHOR:
GH-0584, PR185-19-14, 2016-03-21, edickoum

UTM 19N NAD 83 SCALE: 1:55 000

SOURCES:
Basemap and Land Use Components
Government of Canada, NTDB, 1:50,000, 1979
Government of NL and government of Quebec,
Mining Components
Howse Minerals Limited/
MET-CHEM Howse Deposit Design
for General Layout, 2015
Groupe Hémisphères, Hydrology and update, 2013

ENVIRONMENTAL IMPACT ASSESSMENT
HOWSE PROPERTY PROJECT

Land Use and Traditional Aboriginal Knowledge

Howse Minerals Limited

5731, rue Saint-Louis, Bureau 201, Lévis (QC) Canada, G6V 4E2 | 1453, rue Beaubien est, Bureau 301, Montréal (QC) Canada, H2G 3C6

**Figure
4-1**

4.2.2 Ongoing Engagement and Consultation Mechanisms

HML, via TSMC, has engaged with the residents of the Schefferville region for over four years and has been involved in organizing or participating in events to support the community and to strengthen its relationships with the Aboriginal and non-Aboriginal population of the LSA.

These activities for the interest and benefit of the communities have included:

- the renovation and modernization of the MLJ arena – a significant front-end contribution forming part of the LIM and TSMC IBAs;
- elder’s gatherings;
- school career fairs;
- site tours for students and Elders;
- cultural and spiritual gatherings;
- interactive workshops for students to strengthen ties with schools and to expose youths in school to the numerous and varied careers that can be pursued relating to the mining sector; and
 - various community celebrations, sporting events, and social causes.

HML has also established numerous engagement and participation mechanisms for its projects to maintain an open and transparent dialogue with the Aboriginal groups, and the Howse Project will be integrated into TSMC’s ongoing activities. As indicated above, feedback on the Howse Project collected through these mechanisms was communicated for inclusion in the EIS. These mechanisms include:

- The Community Health, Safety and Environment (HSE) Committee, established in spring 2013, and represented by mandated officials of the NIMLJ, the NNK, ITUM, the Labrador Innu, the NCC and TSMC/HML. The Committee meets three to four times per year, and its general responsibilities include:
 - Serving as a formal mechanism for communication and cooperation between TSMC/HML and Aboriginal groups with respect to HSE-related matters pertaining to the Project;
 - Serving as a monitor and facilitating the implementation of TSMC/HML’s HSE-related objectives or obligations under its respective IBAs, provincial and federal laws, and corporate policies with regard to HSE-related matters;
 - Reporting in a timely manner on the environmental effects and TSMC/HML’s compliance with its HSE objectives and obligations;
 - Facilitating, integrating and coordinating the involvement of Aboriginal groups and appropriate and qualified organizations and businesses in the environmental monitoring and mitigation of environmental effects;
 - Reporting and making recommendations to TSMC/HML and the Aboriginal groups with respect to environmental monitoring and mitigation for the Project;
 - Serving as an accessible, public repository of environmental data, studies and reports relevant to the Project, subject to such confidentiality provisions as may apply;
 - Carry out such other functions as are referred to it jointly by TSMC/HML and Aboriginal groups.

HML considers this committee as a working group and the preferred forum for open discussions and addressing issues relating to health, safety and the environment. HML provides information transparently to HSE Committee members and encourages members to disseminate the information to their community. HML supports initiatives to assist in the communication flow between the HSE Committee and community members. All documents that relate to the HSE Committee meetings are saved on a shared drive to which all members have access. Many Howse Project documents are also available on this server: meeting

minutes, maps, Howse Project Registration, DSO Project environmental studies, internal monthly environmental monitoring reports, pamphlets, environmental follow-up reports, etc. Given that DSO and Howse Projects involve the same stakeholders, HML has included the Howse Project within the work of the HSE Committee. Table 4-4 summarizes the proceedings of the HSE Committee.

Table 4-4 Meetings of the HSE Committee and Discussions on the Howse Project

MEETING LOCATION AND DATE	MEETING FOCUS , INCLUDING ANY QUESTIONS / ISSUES RAISED AND PROPONENT RESPONSE
<p>Uashat, October 7, 2013</p> <p>Present: Representatives of NIMLJ, NNK, ITUM, and IN.</p>	<ul style="list-style-type: none"> ▪ Provision of information on planned mining activities relating to the Howse Project, including details on the Exploration Plan; ▪ NIMLJ and ITUM representatives expressed concerns with the proximity to Irony Mountain ("Kauteitnat"), which has spiritual and historical significance to the Innu, as well as the Project's planned production timeframe; ▪ It was explained that a separation (buffer) zone will be established and maintained between Kauteitnat and Project activities; ▪ Aboriginal groups will be kept informed of exploration and development activities as they progress, and TSMC will support the groups in the dissemination of information to their membership.
<p>Timmins Site, January 28, 2014</p> <p>Present: Representatives of NIMLJ, ITUM, NNK and NCC.</p>	<ul style="list-style-type: none"> ▪ TSMC provided an update on the DSO project, and presented information including location, purpose, and nature of the partnership between HML and LIM and implications for IBA obligations, the environmental assessment process, environmental effects, and effects avoidance and reduction. Handouts were also provided, including maps and pamphlets in English and Naskapi or French and Innu. ▪ The in was invited but could not participate due to a schedule conflict. Information provided at meeting was forwarded electronically. No comments on Howse Project were received from the IN. ▪ No concerns were raised by NCC members. ▪ NIMLJ, NNK and ITUM had concerns with the cumulative effects of dust caused by mining activities in general. ▪ Although dust originates from multiple sources, it was agreed that HML and the communities will collaborate to take steps towards greater dust control in the Schefferville area, including the creation of a Steering Committee on air quality involving the Town of Schefferville and other mining companies active in the area, and which will require the support from the provincial and federal governments regarding investment in the local road system. ▪ The NIMLJ recommended hiring Innu environmental science graduates for environmental monitoring work. HML indicated that it has previously provided job shadowing opportunities for students interested in environmental studies though the TSMC DSO project, and is continuously seeking profiles of Aboriginal candidates for the position of Environmental Technician/Coordinator. The NIMLJ will forward résumés of Innus with the relevant education for consideration in future employment and work experience opportunities.
<p>June 6, 2014, Schefferville, QC</p> <p>Present: Representatives of NIMLJ, NNK, ITUM, NCC. By phone: IN.</p>	<ul style="list-style-type: none"> ▪ Review of the Committee's mandate and responsibilities of members regarding transfer of information to respective leadership and community members ▪ The Howse Project deadline for comments from the public on federal government guidelines for EIS is July 3, 2014 <p>Measures taken by TSMC to control dust:</p> <ul style="list-style-type: none"> ▪ Hiring of a water truck to apply water between the Timmins site and the Schefferville landfill; ▪ Speed limit of 50km/hr established for TSMC employees and contractors; ▪ TSMC collaborating with the Town of Schefferville in the purchase and use of a wash bay that will be installed at the end of the Summer 2014. The principal users will be TSMC and its contractors, but all vehicles coming from the mines to town will be required to use the wash bay; ▪ Evaluation of product application options on the road; ▪ Internship opportunities were offered to the local schools but students were not identified or were not available.

MEETING LOCATION AND DATE	MEETING FOCUS , INCLUDING ANY QUESTIONS / ISSUES RAISED AND PROPONENT RESPONSE
<p>November 26, 2014, Schefferville, QC</p> <p>Present: Representatives of NIMLJ, NNK, ITUM.</p>	<p>TSMC will be an active member of the Schefferville Region Emergency Measures Steering Committee, composed of the NNK, NIMLJ, Sureté du Québec, Town of Schefferville, and Tshiuetin Rail Transportation. A DSO Project update was also presented.</p> <p>Howse Project update :</p> <ul style="list-style-type: none"> ▪ The reports on the socioeconomic and land use studies are being compiled. Light monitoring is taking place at Irony Mountain and Pinette Lake and in Schefferville and Kawawachikamach. ▪ The EIS review period will be at least one year. Aboriginal groups will be attributed a pre-review period, followed by general public consultations.
<p>May 13th 2015</p> <p>Present: Representatives of NIMLJ, NNK, ITUM.</p>	<ul style="list-style-type: none"> ▪ Update on the DSO Project, especially concerning Kivivic region. Construction of the DSO ore process plant is coming to an end. Pictures of the Dome were provided. ▪ Current challenges for the viability of the DSO Project in the context of low iron ore prices. ▪ Health and safety: two security agents were added 24/7 for escorts during the goose hunting season. Road safety needs to be enforced, and TSMC will install road signs on the main road and on the bypass road. ▪ Discussions on the Howse Project: comments received through CEAA. More data required on hydrology, permafrost, surface water, air quality, and wildlife. Field work will be required. ▪ Environmental monitoring: <ul style="list-style-type: none"> ○ Report on environmental incident, silica management, air quality, domestic waste management, recycling, water management, caribou (contribution to Caribou Ungava). ○ One member observed water changing color near Rosemary Lake – TSMC has agreed to analyze water quality in this location. ▪ Re: dust, TSMC in discussions with the Government of Québec on the pavement of roads in Schefferville and Matimekush. TSMC has also agreed to install air quality stations in Schefferville to analyze for silica. ▪ Goodwood and bypass road: will be ready at the end of July 2015. A map of the road will be prepared and distributed to community members.
<p>October 20th 2015</p> <p>Present: Representatives of NIMLJ, NNK, and NCC</p>	<ul style="list-style-type: none"> ▪ Update on the DSO Project, particularly re: Kivivic region. The construction of the DSO ore process plant is complete at 97%. Pictures of the Dome were provided. Plant is being tested and commissioned. ▪ Engagement: reopening of Schefferville arena, Aboriginal training, and softball team. ▪ Environmental monitoring: <ul style="list-style-type: none"> ○ Inspection of culverts along Goodwood road. ○ Airborne silica monitoring (no results to date, beginning of testing), ○ spill response ability improvement ○ sampling in Kivivic area, ○ increase in environmental staff, ○ endangered species protection, ○ Environmental authorizations for DSO3. ▪ Research programs: Vegetation research program cancelled (but looking for other options), water management research program (ongoing discussions), and bioevaluation of air quality (ongoing discussion) ▪ Health and safety: 1.5 million hours worked without lost time injury; proactive approach to health and safety; decrease in health station visits; road safety incident; fire hall completed and emergency practices sessions held. ▪ Update on Howse field studies and completion of EIS.

- Meetings between HML and leadership from each community on a regular basis. These meetings serve as a forum to discuss particular issues with HML executives and Aboriginal community leaders. Periodic meetings also occur with the family trapline holders to discuss

any issues related to the Projects (DSO and Howse Project). In particular, TSMC's Community Affairs Manager and Senior Director, Government and Stakeholders Relations make themselves available to meet with community leadership at their convenience or when required;

- Regular Agreement Implementation Committee meetings held with each Aboriginal group separately to review the successes and challenges in the implementation of these agreements;
- Community Affairs department in place to address matters that relate to community needs, requests, and to ensure compliance within HML and its contractors. The Community Affairs Manager and the Senior Director, Government and Stakeholders Relations remain available to answer concerns raised by community members. The tasks of the Community Affairs department are to :
 - Contribute to maintaining positive relations with Aboriginal communities near the DSOP area and with Aboriginals working on site;
 - Work with TSMC and its contractors to achieve the employment and training objectives outlined in the IBAs;
 - Update and implement Aboriginal human resource development strategy and action plans;
 - Address Aboriginal worker and employer issues relating to employment, training, communication, performance, workplace policies, the environment, culture, and social matters;
 - Be engaged in community projects;
 - Assist in carrying out cultural orientation for all new employees and cultural awareness sessions;
 - Organize cultural training and language courses for all workers on-site;
 - Organize mentorship programs;
 - Prepare meeting minutes and employment reports;
 - Implement other measures conducive to an inclusive workplace;
 - providing information on projects such as the Howse Project and addressing concerns.
- TSMC uses the two local radio stations to provide project updates quarterly. Information on the Howse Project was disseminated by radio periodically in 2014 and 2015, and radio was used to announce the open-house activity in September of 2014. In addition, radio is used at least 48 hours prior to all blasting activities by TSMC.
- A radio announcement was broadcasted in January 2015, and included information relative to the Howse Project: "On the Howse Project, near Irony Mountain, TSMC, through Howse Minerals Limited, will submit to Aboriginal communities in early February a draft environmental impact study as required by the federal government. The document will be sent to the Naskapi Nation and to the Conseil de Matimekush-Lac John for comments. A final draft incorporating comments from Aboriginal communities will then be submitted and made public in March and accessible on the website of the Canadian Environmental Assessment Agency. The public and Aboriginals will then have 30 additional days to provide comments, after which point a final revised version of the environmental study for the Howse Project will be submitted to the Agency and the GNL for analysis." Radio announcements are broadcasted on an as-needed basis, several times per year to communicate company activities, responses to current issues, and general updates on benefits for the communities. For instance, TSMC informed the population in August 2015 of the end of the construction of the iron ore process plant (DSO Project), the possibility to access the Timmins-Kivivik bypass road, and positive socioeconomic effects including employment of Aboriginals, contracts and community initiatives funded by HML IBAs.
- Periodic bulletins are also sent to all post office boxes in the Schefferville region (Schefferville and Kawawachikamach) by HML to provide updates on mining activities, on the Howse Project planning process, and current issues (Volume 1 Appendix XI). For instance, the summer 2015 newsletter announced the completion of the K rail railway, the advancements on the Goodwood road construction, and information on the percentage of jobs occupied by /

contracts awarded to Aboriginal peoples at the Timmins site. Events and actions organized in the communities were also communicated (renovations in the area and tree planting, for example).

HML also participates in three local partnerships that will bring positive changes in the Schefferville area:

- Agreement between the Sureté du Québec (SQ) and the Royal Newfoundland Constabulary (RNC): This agreement allows the SQ to intervene in Labrador, at the camp site for example, without having to request permission from the RNC. The agreement was signed on August 31, 2014. The SQ is now given full powers for interventions in Labrador in cases of emergency or for preliminary inquiries (Bouchard, Communication, and September 26, 2014). This facilitates the work of the SQ, as the officers are now protected by this agreement.
- Standing Joint Committee on Emergency Measures (SJCEM) for Kawawachikamach, Matimekush-Lac John and Schefferville. In June of 2014, a forest fire broke out not far from Kawawachikamach. TSMC and its contactors helped contain the forest fire but also arranged for food and accommodations for the evacuated people from the community. Chief Noah Swappie sent a letter thanking TSMC for their support. This event coincided with an initiative supported by AANDC and the Québec's Ministry of Public Safety to reunite several actors (social services, public safety, and businesses) working locally to collectively work together to improve public safety in Schefferville area. The terms of reference for this committee are in the process of being approved, and TSMC/HML has been invited to be a member of the committee.
- A Regional Steering Committee on Mining Issues was formed May 2015 as a result of concerns raised by residents of Schefferville and Matimekush. Composed of local organisations (Ville de Schefferville, Schefferville airport, local enterprises, First Nation representatives, land-users) and of TSMC representatives, the objectives of this Committee are to discuss and address concerns related to mining activities in the Schefferville area and potential measures that would improve the quality of life of residents. Issues have included dust, the capacity of local infrastructure, cleanliness of workers and their vehicles in public areas, access to Greenbush, Kivivik, and Goodwood areas, road safety, etc. Measures since been taken by TSMC in improve conditions for residents.

Finally, HML has an open communication policy in place by which all leaders or community members may communicate directly with the companies' representatives when they need to obtain specific information or to convene a meeting if needed.

4.3 HOWSE PROJECT EIS CONSULTATIONS

4.3.1 Consultations on Project Registration

A draft copy of the Project Registration was sent to all five Aboriginal organizations at the end of January 2014 for review and comments within a 30-day time frame.

NIMLJ, IN and NCC offered comments to inform the EIS requirements (guidelines). NNK provided questions and comments on the Project Registration itself. Although many questions were raised on technical aspects of the projects, general comments and important issues for NNK can be extracted from this document. ITUM submitted an email in support of the Howse Project dated July 5th 2014, indicating to the CEAA and the GNL that it had signed IBAs with both LIM and TSMC, and that ITUM "wishes to convey to both Canada and Newfoundland that ITUM will address its concerns with respect to the development of the Howse mine directly with the proponent".

Table 4-5 Consultations on Project Registration

ABORIGINAL GROUP(S), LOCATION, DATE	MEETING FOCUS , QUESTIONS / ISSUES RAISED	PROPONENT RESPONSE
NIMLJ, Montreal, June 3, 2013	Presentation of information on the Joint Venture and plans to mine the Howse deposit. No concerns were raised.	
IN, Montreal, July 18, 2013	Provision of a Project update, including information on the Joint Venture and plans to mine the Howse deposit. No comments were received.	
ITUM, Montreal, August 8, 2013	Provision of a Project update, including information on the Joint Venture and plans to mine the Howse deposit.	Indicated that further discussion on the mining of Howse will be required at a later time.
NIMLJ, NNK, ITUM and IN, Individual emails, October 15, 2013	Information regarding the 2014 permit application for the Howse deposit. No responses were received.	
NIMLJ Council, Site visit, Howse Property November 7, 2013	Potential disruptions to goose hunting activities on the opposite (west) side of Kauteitnat in May as a result of noise from the proposed mining activities.	<ul style="list-style-type: none"> ▪ Adjusted the Project layout to minimize visual effects on Kauteitnat; ▪ Will ensure continuous access to Pinette Lake and Howells River Valley. ▪ To discuss with the NIMLJ how to avoid or reduce any potential disturbance through Project construction and operations planning.
ITUM delegation – site visit Site visit, Howse Property November 10, 2013	<p>The Howse deposit is situated on the trapline of the Jean-Marie MacKenzie family (210) and the Louis Sylvestre MacKenzie family (207), presently residing in Uashat and Maliotenam. An ITUM delegation, including members of the MacKenzie family, to the Howse site to discuss the exploration work and its distance from Kauteitnat.</p> <p>Requested that TSMC establishes a sufficient buffer zone between Kauteitnat and the planned exploration and mining activities and efforts to minimize any visual effects.</p>	Adjusted the Project layout to reduce waste pile height and thus the visual effects, and increased the distance between Irony Mountain and the Project.
NIMLJ, By email, January 24, 2014	Submission of the Draft Project Registration and request for review and comments within 30 days. No comments were received.	
ITUM, By email, January 24, 2014	Submission of the Draft Project Registration and request for review and comments within 30 days. No comments were received.	
NNK Council, Kawawachikamach, January 28, 2014	<p>HML presented information on the Howse Project, including location and purpose, the environmental assessment process, environmental effects, effects avoidance and reduction, and maps. Handouts were also provided, including maps and a pamphlet in English and Naskapi.</p> <p>Questions:</p> <ul style="list-style-type: none"> ▪ Access to harvesting grounds. 	<ul style="list-style-type: none"> ▪ The company will ensure that land users will continuously have access to harvesting grounds except for periods of blasting. ▪ LIM will be responsible for revenue-sharing payments².

² As previously explained, the responsible development of the Howse Project was provided for in the LIM agreements. However, given the change in circumstances whereby HML acquired 100% of the Howse deposit and LIM obtained Court protection under the CCAA, it is the intention of HML to incorporate the Howse deposit into its agreements with Aboriginal groups.

ABORIGINAL GROUP(S), LOCATION, DATE	MEETING FOCUS , QUESTIONS / ISSUES RAISED	PROPONENT RESPONSE
	<ul style="list-style-type: none"> ▪ Mechanics of the IBA were raised. 	
IN, By email, January 29, 2014	Submission of the Draft Project Registration and request for review and comments within 30 days. No comments were received.	
NNK, By email, January 29, 2014	Submission of the Draft Project Registration and request for review and comments within 30 days. No comments were received.	
NCC, By email, January 29, 2014	Submission of the Draft Project Registration and request for review and comments within 30 days. NCC asked about the mechanics of the agreement obligations in relation to the joint venture between LIM and HML and the implications if LIM defaults on its revenue-sharing payments.	Should LIM default on payments relating to the Howse Project, HML will assume responsibility for said payments.
NNK Community-at-large Kawawachikamach, January 29, 2014	<p>Information Centre held³, publicized prior to the event via postings in public buildings and radio announcements. Approximately 10-15 community members attended. Information was presented on: location and purpose of Project; nature of the partnership between HML and LIM and implications for IBA obligations; potential environmental effects, assessment process, and mitigation measures.</p> <p>Question:</p> <ul style="list-style-type: none"> ▪ Will Howells River be affected by the Project? ▪ Mining is destructive to the land and the people who use it and is occurring at an overly advanced pace. ▪ What is the restoration plan? 	<ul style="list-style-type: none"> ▪ The Howells River will not be affected because it is sufficiently removed from Project site and on the other side of Irony Mountain. ▪ Restoration will be progressive in nature and consist of laying topsoil that was set aside from preliminary mining works, planting vegetation, building safety barriers around pits, re-grading waste dumps to resemble the natural landscape, environmental monitoring for 10 years following pit closure.
Members of the Jean-Marie Mackenzie family and the Louis Sylvestre Mackenzie family (holders of Trapline Nos. 207 and 211) Uashat, January 30, 2014	<p>HML provided an update on TSMC's DSO project. Information was presented on: location and purpose of Project; nature of the partnership between HML and LIM and implications for IBA obligations; potential environmental effects, assessment process, and mitigation measures.</p> <p>Questions raised:</p> <ul style="list-style-type: none"> ▪ Why was this location chosen to mine and can the mine be farther away? ▪ Where will the process water be sent? ▪ Many birds nest on Kauteitnat. ▪ Recommendation for hiring Innu environmental science graduates for environmental monitoring work. ▪ Are there tests for mercury and other heavy metals in fish (apprehension that fish could contain heavy metals as a result of mining)? ▪ Concerns about possible dumping of wastewater into nearby lakes 	<ul style="list-style-type: none"> ▪ The Howse deposit has a very high iron ore content. ▪ Tailings process water is expected since the ore will be mined, crushed, screened and shipped without being processed at the plant. ▪ Clearing and stripping will be suspended during bird nesting. ▪ HML welcomes profiles of Aboriginal candidates for the position of Environmental Technician, and for job shadowing with the Environment Team. ▪ HML does not have a procedure for monitoring heavy metals in fish. ▪ Wastewater: HML does not have sufficient information on the matter to comment.

³ Posters were made available, as well as handouts, including maps and pamphlets in English and Naskapi.

ABORIGINAL GROUP(S), LOCATION, DATE	MEETING FOCUS , QUESTIONS / ISSUES RAISED	PROPONENT RESPONSE
	<ul style="list-style-type: none"> ▪ Is there a possibility that blasting activities could cause cracks in Kauteitnat. ▪ What is the schedule for workers? 	<ul style="list-style-type: none"> ▪ Such cracks would not occur given the measures taken to contain the blast to a very small area. ▪ Work schedules vary according to the employer/contractor, but are usually 12 hr/day, 14 days on, 14 days off for TSMC employees
ITUM Community-at-large, Uashat and Maliotenam, January 30, 2014	Pamphlets on the Howse Project in French and Innu were distributed in public places in Uashat and Maliotenam.	
NIMLJ and ITUM Councils, Matimekush, February 12, 2014	Meeting to discuss the Howse Project and other matters. ITUM asked about the mechanics of the IBA obligations in relation to the joint venture between LIM and HML and the implications if LIM defaults on its revenue-sharing payments.	Should LIM default on payments relating to the Howse Project, HML will assume responsibility for said payments.
NIMLJ Council, Matimekush, March 14, 2014	Information was presented on: location and purpose of Project; nature of the partnership between HML and LIM and implications for IBA obligations; potential environmental effects, assessment process, and mitigation measures. NIMLJ asked about ownership of Howse and IBA responsibilities in the hypothetical event that LIM enters into bankruptcy.	In this situation, HML would have the option to acquire the Howse Project.

As explained above, the development of the Howse Project was provided for in the LIM agreements. However, given the change in circumstances whereby HML acquired 100% of the Howse deposit and LIM obtained Court protection under the CCAA, it is the intention of HML to incorporate the Howse deposit into its agreements with Aboriginal groups.

In addition to these meetings, several comments were received in writing on the EIS Project Registration. These written comments and questions received from the NIMLJ, NNK, IN and NCC are found in Volume 1 Appendix XII. These comments were significant for HML as they provided guidance in the preparation of the preliminary EIS, and enabled an informed scoping of issues. In addition, they served as a basis for the proponent’s subsequent consultation efforts, especially in terms of the involvement of local land-users. The main concerns expressed in writing during the spring of 2014 by Aboriginal groups are summarized as follows:

NIMLJ:

- an environmental assessment is required for the Project given its environmental effects on fish and their habitat, aquatic species and migratory birds, on the NIMLJ community and on its ancestral rights;
- potential sources of pollutants and emissions are and will be noise, vibrations, dust, suspended solids, exhaust gases and greenhouse gases from the heavy machinery and vehicle traffic, impacting the NIMLJ community and its rights;
- dust and poor air quality from mining-related activities is having major repercussions on community members;
- negative effects of the noise from vehicle and air traffic;

- work on the railway and blasting restrict access to ancestral lands for traditional activities. Paths used to access lands are completely inaccessible in the spring because of mud;
- concerned about the survival of caribou and protective and management measures required. Subsistence caribou hunting is a practice, custom and tradition that forms an integral part of MLJ Innu culture;
- environmental effects of mining have been driving migratory birds away and have affected their reproduction and the traditional practice of goose hunting, mostly on the Howells River; and
- concerned about the presence of heavy metals in any fish caught near the Project.

NNK:

- concerns regarding respect of the IBA as per the Joint Venture Agreement and whether the Howse Project will be included in an updated IBA;
- concern for passenger train service potentially affected by increased ore transportation;
- concern that the Proponent's agreement with the GNL regarding employment and business opportunities takes precedence over IBAs;
- attention must be paid to archaeological sites or artifact discovery throughout the life of the Project;
- the Proponent should propose compensation for the potential loss of traditional hunting and gathering grounds, known to be used by Naskapis;
- Naskapis need to be consulted on traditional knowledge;
- the effects on the caribou populations should be taken very seriously;
- potential effects of mining and dewatering on the aquatic fauna or its habitat, fish eggs and spawning grounds should be monitored and reported;
- the cumulative effects of trains on caribou are increasing with every new project, and need to be analyzed in depth;
- the NNK should be kept updated following the submission of the hydrogeological report, notably on effects of seepage from waste rock piles and of dewatering on the water table and water bodies; and
- sightings of wildlife (wolverine, caribou or lynx, etc.) should be reported to the NNK and the Government.

IN:

- There is a need for an Environmental Assessment of the Project given the potential adverse effects on fish and fish habitat, migratory birds, and the Innu of Labrador's health and socioeconomic conditions, heritage, exercise of their rights, and archaeological sites. Cumulative effects must also be addressed;
- Concerned that the project could have serious negative effects on the George River caribou herd - proposed mitigation measures will have to address the gravity of the situation;
- An up-to-date and comprehensive assessment of the Innu of Labrador's historic use in the area and proper archaeological assessments should be done with the involvement of the IN. Proper mitigation measures must be put in place to protect archaeological sites;
- The potential effects on the health and socioeconomic conditions of the IN needs to be fully understood;
- Concerned about the effects of dewatering on the watersheds and ecosystems, as well as about the effect of the numerous mining projects on water quality in the region;
- There should be a fully funded consultation plan with Canada to assess the effects of the proposed Project on Aboriginal rights;

NCC:

- Major concerns about the Project are the following: general adverse effects on wildlife caused by loss of habitat; effect of silica dust on air quality; adverse effects of tailings ponds; loss of habitat in the mine site area affects accessibility to other areas due to loss of trail routes; effects on affordable housing in the area; hiring;
- Cumulative effects must be considered: added noise, dust, water contamination, habitat loss for various species, population increase, NCC communities and the general area must be addressed in a substantial manner;
- Concerns regarding the effects on the George River Caribou Herd;
- Ongoing projects and exploration will add to the number of flights to the Schefferville and Wabush airports;
- The mines’ power needs affect local communities in a region already strapped for available electrical power; and
- Clarify how the water table and groundwater in the region will be affected by the project.

4.3.2 Consultations on Environmental Impact Statement

Consultations for the EIS took place between September 2014 and November 2015. These included:

- Initial Community Consultations from September to November 2014. These consisted of in-person interviews held in Matimekush, Schefferville, Kawawachikamach and Uashat-Maliothenam, with community representatives and land users relating to potential effects, measures or concerns (Section 4.3.2.1). Consultations were also held with other stakeholders such as the Town of Schefferville and business partners (Section 4.3.2.1). A Project presentation (Volume 1 Appendix XIII) and a pamphlet (Volume 1 Appendix XIV) explaining the Howse Project were prepared to serve as visual support for these interviews;
- Aboriginal Consultations on Preliminary Draft between January and November 2015 (Section 4.3.2.2); and
- Feedback Received on Mitigation Measures from Local Aboriginal groups (Section 4.3.2.3).

4.3.2.1 Initial Community Consultations and Aboriginal Traditional Knowledge

NIMLJ and NNK Representatives and Community Members

Aboriginal communities included in the LSA are the NIMLJ and the NNK. Three types of interviews took place in Matimekush-Lac John and Kawawachikamach: interviews to obtain feedback and concerns on the Howse Project from community Councils and other representatives (for example, Council elected officials, community administrators, police officers, CLSC and public health, school directors, etc.), interviews with land-users, and interviews for the purpose of data collection, mostly to establish the baseline conditions.

Table 4-6 NIMLJ and NNK EIS Interviews

REPRESENTATIVES	DATE
NIMLJ	
Chief Real Mackenzie	September 23 and 24, 2014
Members of the NIMLJ Band Council (3 members)	September 23, 2014
Director General	October 28, 2014
Director, Public Works	September 23, 2014
Environment Officer	September 24, 2014

REPRESENTATIVES	DATE
Land-users (elders)	September 25, 2014
Land-users (youth)	October 28, 2014
Local dispensary (Health Canada)	September 26, 2014
School Director	September 24, 2014
Public Safety (SQ)	September 26, 2014
NNK	
Chief and Council	September 22, 2014
Environment Officer	September 22, 2014
Public Works Department	October 28, 2014
Naskapi Development Corporation	September 22, 2014
Local CLSC (3 members, including the physician for Schefferville area)	September 24 and 25, 2014
Jimmy Sandy Memorial School principal	September 25, 2014
Public Safety (NNK Police)	September 25, 2014
Land-users (elders)	September 26, 2014
Land-users (youth)	October 27, 2014

In addition to these meetings, an open-house event was held on September 23rd, 2014, at the NML/TSMC office in Schefferville. Concerns expressed by both local First Nations were mostly related to the effects of dust on air quality and the cumulative effects of the different mining projects in the region. Other comments and questions received included:

- the daily difficulties associated with an ongoing mining operation in the area;
- IBAs perceived as not being respected, lacked transparency and tangible commitments;
- questions of responsibility of LIM IBA commitments in context of HML partnership;
- economic development opportunities are welcome, though more benefits should flow to local First Nations, including training, filling of qualified positions, and overall benefits for community members;
- the need for better communication; and
- effects on water bodies and other resources.

Comments received during the Open House event confirmed issues that were raised by community members during previous consultations. Given that this was a public consultation, a registry of the participants was prepared, but HML indicated that the comments made would remain confidential to ensure that participants would feel free to ask their questions.

LOCAL ABORIGINAL TRADITIONAL KNOWLEDGE AND LAND-USE

Recognizing the importance of ATK and land-use practices, specific interviews for land-use and occupation were carried out in relation to the proposed Howse Project mine site, the detailed results of which are presented in Volume 2 Appendices C and D. It should be noted that an Innu researcher was hired to conduct a portion of the field work. The interviews allowed the Proponent to take stock of the many concerns in relation to the environment and wildlife, harvesting activities, and the transmission of ATK by the Innu of MLJ, the ITUM, and the Naskapi. While Elders indicated that they rarely frequent the area anymore, but

suggested that younger land-users be interviewed. The younger harvesters pointed to the difficulties in reconciling land-use with full-time employment, and mining activities with safe access to land and resources.

It should be noted that a meeting was held with members of NIMLJ in August of 2015 to obtain their feedback on Figure 4-1.

As previously indicated, NIMLJ community members frequently use the land in the vicinity of the Howse Project, while certain ITUM members are the holders of family traplines. The Naskapi also use the land to harvest resources in the area of the Howse Project (Figure 4-1). Their respective concerns on land-use are further discussed in Section 7.5.2.1. Table 4-7 provides a summary of the concerns raised during discussions on land-use, using participatory mapping, with Aboriginal stakeholders, Elders, and by land-users and trapline holders.

A summary of responses/ mitigation measures and feedback received from the local First Nations is included in Table 4-11.

Table 4-7 Summary of Issues Raised by Aboriginal Stakeholders, Land-Users and Trapline Holders

THEME	COMMENTS MADE DURING COMMUNITY CONSULTATIONS (NIMLJ AND NNK)	COMMENTS MADE BY LAND-USERS (NIMLJ AND NNK) AND BY TRAPLINE HOLDERS (ITUM)
Access to Land (Section 0)	<ul style="list-style-type: none"> ▪ Need for a bypass road. The Howse project is located on the road that leads to Kauteitnat and it will prevent land access. ▪ There is a security escort on the way in, but not on the way back, and users must pass around large trucks. ▪ Will the existing road near Pinette Lake be kept open to the public? What is the alternative? ▪ Ongoing work blocks road access in Goodwood and Greenbush 	<ul style="list-style-type: none"> ▪ Access to the land is a very important issue and a bypass road would better ensure this access. ▪ The gate and machinery are disturbing. Many do not want to pass through the security checkpoint and be escorted - it is too restrictive. ▪ Ski-doo access is not possible because of mining traffic on road, and trucks leave rocks behind. ▪ Access to Pinette Lake for fishing will become difficult. ▪ Mining activities are being practiced on the same routes used for hunting. ▪ It is important to the community that young Innu still have opportunity to travel to the Howells River in the future
Agreements (Section 7.5.1.1)	<ul style="list-style-type: none"> ▪ IBAs are not transparent and are too complicated for people who are not familiar with their content. Little information is communicated on IBAs, and only Council is kept informed. ▪ People want tangible commitments, such as a training center. ▪ If LIM goes out of business, HML will theoretically go out of business too. 	<ul style="list-style-type: none"> ▪ Will there be compensation or royalties for loss of these resources? ▪ Some regret having signed the agreements and feel there is no respect from the mining companies.
Air quality and Cleanliness (Section 7.5.2.2)	<ul style="list-style-type: none"> ▪ There was no air quality monitoring and the community was not tested. ▪ Air quality and dust are a problem especially in summer when it is dry. Dust can be seen on windows and in offices and it deposits on berries, plants, and in lakes. ▪ The town is dirtier than before due to mud and filthy vehicles ▪ There should be a security gate at the town limits to control traffic, as was done by IOC. 	<ul style="list-style-type: none"> ▪ Dust is considered as an important issue, and its effects on air quality, water quality and health are a concern. ▪ Dust from mining activities and from trucks is a concern.

THEME	COMMENTS MADE DURING COMMUNITY CONSULTATIONS (NIMLJ AND NNK)	COMMENTS MADE BY LAND-USERS (NIMLJ AND NNK) AND BY TRAPLINE HOLDERS (ITUM)
Caribou and other resources (Section 7.5.2.1)	<ul style="list-style-type: none"> ▪ The caribou has been present in the region for centuries but hasn't been present for 10 years because of mining, and won't come back because of blasting. ▪ All works should be stopped when a caribou herd is present. ▪ People need to go further to harvest food and other resources, including caribou, grouse and berries. 	<ul style="list-style-type: none"> ▪ There is a concern that animals will move farther away because of new mining activities. ▪ People depend on hunting and fishing for food supply and they worry they will need to go further for hunting (food supply). ▪ There are costs to going farther. Costs for hunting and fishing can double. Also, food in the supermarket is expensive. ▪ The long-term use of land to practice traditional activities by young First Nations is important.
Communication (Section 0)	<ul style="list-style-type: none"> ▪ Information from the HSE Committee does not come through, is not communicated to the community. ▪ The Liaison Officer is Naskapi, which creates a language barrier. Why not also have an Innu. ▪ People working for security are all English and don't speak French. This is intimidating for the Innu who don't speak English. ▪ The community does not know who to reach if there is a problem with TSMC. ▪ If there are effects on Lake Pinette, information about potential pollution should be communicated by the company. ▪ Information is often limited to hot topics, such as Health, Safety and Environment. The community would like to know more about social effects, which requires a different type of communication. ▪ There is a need for more consultation and explanations on the project, as well as more citizen participation. ▪ Many people do not know what the CEAA is. There are many ways to reach the population – radio, Facebook, etc. 	<ul style="list-style-type: none"> ▪ People wish to have more information on the project - they feel they know very little.
Economic benefits (Section 7.5.3.5)	<ul style="list-style-type: none"> ▪ Because of the fly-in fly-out system, royalties go to Labrador and they collect income tax from workers. ▪ Innu do not have their share of benefits. ▪ Infrastructure and facilities in the community are not well maintained: some street lights are broken, and sidewalks and road need maintenance and major repairs. There is no financing. The Council would like support from TSMC. ▪ There is a feeling that TSMC takes more care of people in Labrador than of the Innu of Québec, even though effects are felt in Québec and Québec Innu are the ones that use the territory. ▪ Economic development is a positive effects of the project. ▪ NNK have small contracts with mining companies. It's hard for them to compete with bigger companies. They always have to bid, but don't always have the expertise. TSMC should give them the job instead of fighting fair game. 	<ul style="list-style-type: none"> ▪ More economic benefits are wanted - some feel only TSMC will profit from mining operations. ▪ There should be more partnerships with the Innu. ▪ Economic benefits need to be equitably distributed.

THEME	COMMENTS MADE DURING COMMUNITY CONSULTATIONS (NIMLJ AND NNK)	COMMENTS MADE BY LAND-USERS (NIMLJ AND NNK) AND BY TRAPLINE HOLDERS (ITUM)
Employment and Training (Section 7.5.3.2)	<ul style="list-style-type: none"> ▪ Companies need to reinvest locally. ▪ TSMC does not respect agreements regarding employment and training. There are presently only 10 Innu working. ▪ Local people want jobs. In the end, there are few Natives employed. ▪ Cases of discrimination have occurred, employee abuse. People work too hard. There does not seem to be a clear complaint mechanism at the camp. ▪ In the first years, Innu / Naskapi workers were employed, but the number of employees decreases each year. Some are now in debt. ▪ Some training has been carried out, mainly heavy machinery operation. Mamu has contracts, but they employ white outsiders. Youth from the community do not have contracts. ▪ Trained persons are not employed by the mine. Some have been trained and were later dismissed. ▪ People see that many people in Labrador and Uashat are employed. Some of them do not have their competency cards. ▪ Job postings require potential employees to speak English, which is very limiting for the Innu. ▪ Some workers do not know their rights (e.g., CSST). There is no labour organization for Québec workers. Cross-border problems are significant. ▪ There is no targeted training for women, most of the work is for men. Women could be used, for example, for construction finishing stage. ▪ Employment makes people proud of themselves, brings personal growth and better living standards. However, it can lead a person to consume more alcohol. ▪ There are ongoing training programs – for example, heavy machinery. Would like to see the Naskapis in qualified positions, such as millwrights, mechanics, and boilers. ▪ There is a career fair in the community, organized by the academic councillors. Sometimes, mining companies participate. Exploration/mining people have come to explain about the types of jobs. A mining-oriented career fair might help. ▪ There is no facility for vocational training in the area. There is the new learning center, but it is small. A proper training facility should come soon. 	<ul style="list-style-type: none"> ▪ There is a desire for more qualified jobs for the Innu, and more specialized training. ▪ Some feel Innu are hired at the beginning of the Project and are then limited to unskilled jobs (cleaning). ▪ There is concern that jobs are not fairly distributed between Québec and Labrador and that the NIMLJ should have its fair share. ▪ Mining companies employ people from Labrador and the outside on a fly-in-fly out basis. There are no local jobs or benefits. ▪ Some locals think that if there is mining development, jobs should be given to the members of the family that use or occupy the land. ▪ Employment is a great concern and TSMC should respect the agreement and ensure jobs for the community. ▪ To avoid problems with racism between workers, there should also be local bosses. ▪ There are pressures between workers and workers do not complain because they are afraid of losing their jobs if they do. ▪ There should be better monitoring and communication on jobs and promotions. ▪ People are glad that there will be job opportunities again.

THEME	COMMENTS MADE DURING COMMUNITY CONSULTATIONS (NIMLJ AND NNK)	COMMENTS MADE BY LAND-USERS (NIMLJ AND NNK) AND BY TRAPLINE HOLDERS (ITUM)
Environment (Section 7.5.2.1)		<ul style="list-style-type: none"> ▪ Respect for the environment is a concern. ▪ Would like feedback on environmental monitoring. ▪ Major concerns are for wildlife, trees, the environment and ecosystems. ▪ Disturbances to vegetation and trees by industrial activities are a concern. ▪ There are concerns on the monitoring of the environment by mining companies.
Health (Section 7.5.2.2)	<ul style="list-style-type: none"> ▪ People with alcohol problems are often unemployed. Those who are able to maintain a job are sober. ▪ Many white construction workers have substance abuse problems. It is hard to know who supplies the camp, locals or whites. 	<ul style="list-style-type: none"> ▪ Health services are more burdened than before and some are concerned about access to health services. ▪ Concerns on the presence of outside workers bringing new viruses and affect Innu health. ▪ As with IOCC, there should be health exams and drug testing before workers are employed ▪ -The effect of dust on health is a concern.
Kauteitnat/Cultural Heritage (Section 7.5.2.1)	<ul style="list-style-type: none"> ▪ The project being near Kauteitnat could be problematic. ▪ The issue of the discovery of a burial site was raised – people ask if the company would stop building in this area if there was one. 	<ul style="list-style-type: none"> ▪ The mountain is an important landmark used for orientation and to spot caribou, and is a feeding ground for ptarmigans and Canada geese. ▪ The site is appreciated and has a historical and sacred value. ▪ There is a will to protect the mountain. People are concerned the mountain will eventually be mined. ▪ Discovery of artifacts or any archaeological element should be well communicated. This should be the object of an agreement. ▪ Elders are very attached to Kauteitnat. ▪ Blasting near Kauteitnat should be avoided. ▪ The mountain is considered as a nice area that should become a park but protection has never been discussed. ▪ The site is used for blueberry picking and caribou sighting. ▪ Kauteitnat represents a lot of history, particularly geological history.
Noise (Section 7.3.3)	<ul style="list-style-type: none"> ▪ Noise scares away animals. ▪ In May (2014), during goose-hunting season, machinery use was noisy. In the surroundings of Rosemary Lake, machinery could still be heard. However, the geese are still present. ▪ Some Innu can hear the railway from their cottage. 	<ul style="list-style-type: none"> ▪ The effects of vibration are a concern. ▪ Noise can be heard from far away and it drives the animals away. ▪ Effects on resources of noise from helicopters, planes, trucks and blasting are a concern.
Road safety (Section n 0)	<ul style="list-style-type: none"> ▪ The company does not listen and lacks respect for locals in terms of security and subsistence, by blocking the access to resources. ▪ Speeding on the road to Timmins is problematic. Trucks go very fast and it's dangerous. 	<ul style="list-style-type: none"> ▪ People are concerned that traffic constraints will become worse and that the Howse Project will be a problem for road safety. ▪ Safety is a concern; concerns that mining companies could try to save money by skimping on safety measures.

THEME	COMMENTS MADE DURING COMMUNITY CONSULTATIONS (NIMLJ AND NNK)	COMMENTS MADE BY LAND-USERS (NIMLJ AND NNK) AND BY TRAPLINE HOLDERS (ITUM)
	<ul style="list-style-type: none"> ▪ Contractors do not follow the company’s directives and the area is not in the SQ jurisdiction. ▪ Access to camp and Irony Mountain: when travelling on the road in the mine site people are escorted on the way in, but not on the way back. This is a safety issue because it is dangerous. ▪ There are some new roads, and some people felt they would get lost. 	<ul style="list-style-type: none"> ▪ The need to pass through mining activities on the road is a concern.
Rehabilitation n (Section 10)	<ul style="list-style-type: none"> ▪ People are worried that there will be no money left for rehabilitation. It has been the case in the past and LIM is also going bankrupt. It could be the same for TSMC. ▪ Will rehabilitation recreate a live lake? 	<ul style="list-style-type: none"> ▪ Rehabilitation is important because the community feels open pits can be dangerous and remain a source of dust. ▪ Some insist that the company must agree to start site rehabilitation as early as 2018. ▪ Rehabilitation of the mining site and of stock piles is a concern. ▪ The pit should be filled with hard material and not water to avoid dust.
Water Quality (Section 7.3.10)	<ul style="list-style-type: none"> ▪ Concerned by effects on water quality and on fish. 	<ul style="list-style-type: none"> ▪ Contamination of surface water and particularly of the Howells River via groundwater is a major concern. ▪ Want to be informed on the way water will be cleaned if there is contamination. ▪ Concern for contamination affecting wildlife and fish. ▪ Some are worried about accidental spills polluting lakes.

THEME	COMMENTS MADE DURING COMMUNITY CONSULTATIONS (NIMLJ AND NNK)	COMMENTS MADE BY LAND-USERS (NIMLJ AND NNK) AND BY TRAPLINE HOLDERS (ITUM)
CUMULATIVE EFFECTS		
<p style="text-align: center;">Air quality (Section 8.9)</p>	<ul style="list-style-type: none"> ▪ Dust around mining sites is an issue. Dust from the roads is also an issue. ▪ Lakes in the region are affected by dust. Fishing activities are also disturbed. ▪ Since the opening of the mine in 2009, there is more dust and wind creates orange clouds. This could be a source of respiratory problems. ▪ There are dots on fish - dust may be the cause. ▪ Health issues are always a concern. Thyroid issues – could be because of mining activities. ▪ Effects on health are not visible yet, but iron dust may have an effect on health in the long term. 	<ul style="list-style-type: none"> ▪ Every mine creates dust, which creates contamination.
<p style="text-align: center;">Caribou and wildlife resources (Section 8.10)</p>	<ul style="list-style-type: none"> ▪ The disappearance of caribou is a cumulative effect of mining activity. Cause for decline: mining activity and natural causes (mix of both). When IOCC shut down in 1982, caribou came back in the area, which means that mining activity had an effects. When the mining exploration began again, caribou left. More moose are now present in the area. ▪ Geese are less present because of helicopters and some contractors do not follow directives. ▪ Birds’ nests near the TSMC camp are threatened. ▪ Mining activities are affecting livelihoods and food available to populations. ▪ The absence of caribou has an effect on culture. ▪ Berries and fish are used for subsistence. People here live off nature’s resources. ▪ It’s becoming harder to practice traditional medicine because of the effects of dust on berries and plants. 	<ul style="list-style-type: none"> ▪ Pinette Lake is overfished due to easy access. ▪ Effects on resources have changed hunting habits. Since there are no more caribou, people hunt more geese and moose. ▪ Areas around mining sites are avoided for berry harvesting because of dust.
<p style="text-align: center;">Communication (Section 8.9)</p>	<ul style="list-style-type: none"> ▪ There is little information in the community about mining projects – what are the activities and how many workers? ▪ Mining companies do not integrate women and do not communicate with informal organizations. Relations with the community are limited to official organizations (elected officers), but both types should be used. 	

THEME	COMMENTS MADE DURING COMMUNITY CONSULTATIONS (NIMLJ AND NNK)	COMMENTS MADE BY LAND-USERS (NIMLJ AND NNK) AND BY TRAPLINE HOLDERS (ITUM)
Economic Benefits and Employment (Section 8.9)	<ul style="list-style-type: none"> ▪ Kids are quitting school and mining companies should help find ways to keep kids in school, with training, for example. ▪ Mining has had a positive effect on living standards, but money has also amplified existing social problems. 	
Environmental effects (Chapter 7)	<ul style="list-style-type: none"> ▪ All mining activities should be considered as a whole. Many companies are present and are breaking the land. ▪ There are already 18 mine pits, 9 in Québec and 9 in Labrador. These have a major effects and locals have to live with these holes. ▪ The main concerns of the Council are the environment, dust, pollution of lakes, pollution of groundwater, health of youth, and local employment. ▪ The environment is already damaged enough. Locals must live with that without benefiting from the projects. ▪ Long-term environmental effects are worrisome, especially for kids. ▪ The projects are in Labrador, but the effects are in Québec 	<ul style="list-style-type: none"> ▪ There is a feeling that there are so many mining companies that it's hard to isolate the effects of each one. ▪ Some believe that mining activities break up the land. ▪ Some think mining companies should only establish themselves on previously used site and not go any farther. ▪ There is a sense that there are so many mining companies that it's hard to isolate the effects of each one.
Roads and access to Land (Section 8.9)	<ul style="list-style-type: none"> ▪ The Greenbush-Goodwood road is not accessible anymore because it is surrounded by mines. ▪ Roads have damaged the environment. They are very wide and people won't use them anymore because there is too much machinery. ▪ Passenger and freight transport is constrained due to increased ore traffic and priority is given to ore trains. Freight is a particular issue in the summer. The construction period is short, and it becomes more difficult to bring materials, groceries, all types of supplies (May-December). Sometimes (3-4 week period) waiting time, which causes losses – payments for carpenters, staff. 	<ul style="list-style-type: none"> ▪ There are concerns about access to Howells River, which is difficult to access because there is no road. ▪ It is important to the community that young Innu still have the opportunity to travel to the Howells River in the future
Waste	<ul style="list-style-type: none"> ▪ There are concerns about waste and its effects, air quality and the use and disposal of dangerous products. ▪ TSMC does not control and monitor its contractors sufficiently, and exploration activities generate a lot of waste in the environment. 	

THEME	COMMENTS MADE DURING COMMUNITY CONSULTATIONS (NIMLJ AND NNK)	COMMENTS MADE BY LAND-USERS (NIMLJ AND NNK) AND BY TRAPLINE HOLDERS (ITUM)
Water quality (Section 7.3.2)	<ul style="list-style-type: none">▪ Mining activities affect lakes, and locals wonder if it also affects groundwater.▪ Mining activities threaten potable water sources.▪ Oil and fuel pollute water sources.	

ITUM

As indicated above, Uashat and Mani-Utenam are located far from the Project site (over 500 km), but some of their members have family traplines located on the Project site, and ITUM has signed IBAs with both TSMC and LIM. Table 4-8 presents the ITUM members that were met with or contacted during the consultation process. Table 4-9 presents a summary of the issues raised by the ITUM members.

Table 4-8 ITUM EIS Interviews

REPRESENTATIVES	DATE
ITUM	
Chief Mike Mackenzie	November 3, 2014
Bureau de la protection des droits et du territoire, Director	November 4, 2014
Bureau de la protection des droits et du territoire, Environment Advisor and Biologist	November 3, 2014
Tshiuetin Rail Transportation	November 3, 2014
Société de développement économique de Uashat mak Mani-Utenam	November 3, 2014
Louis (Ben) Sylvestre Mackenzie family, land-users (207)	November 4, 2014
Jean-Marie Mackenzie family (211)	November 4, 2014
<i>Data collection discussions</i>	
Public Works	November 4, 2014
Public Safety (SQ)	November 5, 2014
CSLC	November 5, 2014 (was unable to meet at the time, no answer to email)
Director, Education	By email, no answer

ITUM members expressed various concerns; the main issue was the desire for more spin-offs in employment and contracts. Other issues included: the need for a bypass road; the effects on water quality and the environment; the proximity of the site to Kauteitnat (Irony Mountain).

It should be mentioned that the ITUM leadership sent a letter to the federal government and the government of NL confirming that it supports the Howse Project and that it will address its concerns with respect to the development of the Howse mine directly with the Proponent.

Table 4-9 Summary of Issues Raised by ITUM Members

THEME	COMMENTS	EIS SECTION
Access to Land	An alternative bypass road for users is wanted.	6.9.7
Communication	An update of the 2013 site visit in 2015 is requested.	-
Economic benefits	<ul style="list-style-type: none"> ▪ Financial compensation for sensitive areas should be provided. ▪ Uashat also has a minority of contracts. There are very few jobs for Uashat entrepreneurs. 	6.9.9

THEME	COMMENTS	EIS SECTION
Employment	<ul style="list-style-type: none"> ▪ Spin-offs in employment are significant. ▪ There is favoritism for the Naskapi and few jobs for people of Uashat. Uashat people are a minority. Jobs available are often with Sodexo. 	6.9.8
Environment	<ul style="list-style-type: none"> ▪ There is concern regarding the environmental compliance of the Howse Project in general. 	EIS
Kauteitnat	<ul style="list-style-type: none"> ▪ Kauteitnat is a sacred place. There is concern about proximity of the pit to this site (too close). ▪ Kauteitnat Mountain is an observation point. Caribou could be spotted from the top. ▪ Question whether archaeological investigations were properly carried out. 	6.9.9
Water quality	There are concerns about water quality near the Project site.	6.7.10

IN and NCC

The IN of Labrador and the NCC were also consulted for the Howse EIS, but given their considerable distance from the Project site (close to 500 km), and given their participation in the HSE Committee and Implementation Committee, they were consulted by letter in mid-October 2014 (Volume 1 Appendix XV). The letters acknowledged the comments previously received from both groups during the Project Registration phase. No response was received from both groups, but IN provided comments on the EIS preliminary draft as discussed below (Section 4.3.2.2).

Town of Schefferville Representatives and Residents

A meeting was held in April 2014 with the Town of Schefferville Administrator to discuss the Project Registration of the Howse Project. The Town Administrator sent HML a letter dated April 21 2014, indicating that, given that the Howse Project will have no additional effects on Schefferville and the mitigation measures already put in place for environmental protection, the Town supports the Howse Project. Table 4-10 lists the individuals met for the purposes of the EIS.

Table 4-10 Meetings with Schefferville Representatives and Residents

REPRESENTATIVES	DATE
Town Administrator	September 24, 2014
Non-Aboriginal land-users (2)	September 25, 2014
Business person	September 25, 2014
CLSC	September 27, 2014
Sûreté du Québec	September 26, 2014

Stakeholders consulted in Schefferville did not have concerns about the Howse Project, but rather about the cumulative effects of the mining industry’s presence in the area, mostly regarding the town’s inability to deal with a boom in the mining industry. They also relayed the difficulties experienced on a daily basis related to the Québec-Labrador border. In general, the Town would like to be adequately prepared for when the next mining boom, in which case, government participation is necessary (Joncas 2014, personal communication).

Table 4-11 Summary of Issues Raised by Schefferville Representatives

THEME	COMMENTS	EIS SECTION
Howse Project Effects		
Access to land	The gate and the escort on the road make travel difficult. Control at the gate is problematic and it's intimidating to say you work for another company.	6.9.7
Agreements	Mining companies are concerned about First Nations blocking projects and the governments' lack of intervention.	6.9.4
	People do not know their rights and get angry. Mining companies should be their partners.	6.9.4
	There is no agreement between TSMC and doctors, even if an attempt was made.	6.9.6
	There is no agreement between the mining companies and health services. An agreement or a protocol would make things easier for health care employees.	6.9.6
Communication	People on the Reserve are not informed. There is a lack of transparency from the Band Council.	-
Economic benefits	<ul style="list-style-type: none"> ▪ Mines are in Labrador but there are many effects in Québec, particularly Schefferville. Investments must be made for the landfill and waste water system. ▪ Facilities were planned for 850 persons and are functioning at 100-130% of their capacity; the infrastructure is insufficient. ▪ In general, mining development is positive; housing development has started again. 	6.9.7
Employment	<ul style="list-style-type: none"> ▪ It is hard to find two suitable jobs for couples. Families in general do not want to move to the region. ▪ Jobs can have positive and negative effects on health. 	-
Cumulative Effects		
Access to land	<ul style="list-style-type: none"> ▪ The security checkpoint hampers traffic and the escort system is complicated. ▪ Since mining started, some areas have become inaccessible or less attractive. 	6.9.7
Air quality	Dust in town is problematic. A wash bay at the city entrance is supposed be put in place.	6.7.2
Caribou and wildlife resources	Caribou hunting is no longer possible.	6.8.3
Health	<ul style="list-style-type: none"> ▪ Many mine workers are not from Québec and must pay fees when treated for health issues in Schefferville. ▪ Health consultations in Schefferville for mine workers have increased. Many mine workers have poor health. ▪ CLSC workers wish there would be discussion to better coordinate healthcare between Québec and Labrador. ▪ Economic spin-offs can have positive and negative effects on health. 	
Housing	<ul style="list-style-type: none"> ▪ Housing is problematic. Outfitters now provide services to mining companies. ▪ The town cannot expand anymore. There are only 6 lots left for expansion in 2014 (125 in 2012). 	6.9.6
Water quality	The contamination of lakes and its effects on fish are a concern. The proliferation of mining projects will make it more and more difficult to find good lakes to fish.	Chapter 7

Business Partners

Some comments were received from local business representatives, especially those who provide services to the Proponent (Table 4-12). Given that the Howse Project will secure the need for services for the

duration of the Project, it is seen as positive by business partners. However, the purpose of the discussions was to provide business representatives with information on the Howse Project.

Table 4-12 HML Business Partners

ORGANIZATION	DATE OF COMMUNICATIONS
Air Inuit	By letter, November 27, 2014. No response received.
Tshiuetin Rail Transportation	November 3, 2014.
Wabush Airport	By letter, October 14, 2014. Response received November 5, 2014.

Wabush Airport provided an answer to the letter, indicating that Wabush’s airport is owned by Transport Canada. As a Federal Authority under the CEAA, TC has provided comments on both the Project Description and the Environmental Impact Statement Guidelines. The letter indicated that TC has not identified any potential effects related to the Wabush Airport operations in reading the Project Description. TC will also have the opportunity to comment on the Environmental Impact Statement during the review process.

Tshieutin Rail Transportation (TSH) has no concerns regarding the Howse Project, as the volume can be handled with an upgraded maintenance plan. TSH is prepared to carry up to 5 million tonnes per year with its current maintenance plan, and up to 8 million tonnes per year when its railway maintenance plan is upgraded. In 2015, over two million tonnes of ore was transported on the railway. The passenger train is not affected by the freight train, because all pull-off lanes are open. The Howse Project will have little if any effect on the enhanced transportation capacity of TSH (Cordova 2014, *personal communication*).

Other Stakeholders from Labrador and Québec

The Proponent meets with various local stakeholders from the region and in Schefferville on a regular basis, and participates in numerous conferences through which the public can stay informed on current and planned mining projects operated by HML. Regular meetings are held with municipal councils, local authorities and the business community from the Québec-Labrador region (Labrador West, Happy Valley Goose Bay, and Sept-Îles).

Frequent discussions with the authorities of Sept-Îles have been held given the presence of TSMC in the area, more specifically for the use of the Port facilities. Where indicated, these discussions include the Howse Project on behalf of HML. Positive relations were established and are maintained with the City of Sept-Îles and with DESI in particular. The latest meeting held with DESI took place on December 1, 2015.

4.3.2.2 Comments from Aboriginal Groups on EIS Preliminary Draft

A draft version of the Howse Project EIS was submitted to the CEAA and relevant Aboriginal groups for comment. Between March and May 2015, HML received questions from NIMLJ, NNK, IN and the CEAA on this document.

The Final EIS was revised according to the comments and questions received from First Nations and the CEAA. The effects assessment and cumulative effects assessment methodology was thoroughly revised in close consultation with the CEAA. When relevant, answers to questions were integrated into the main body of the EIS. Additional supporting studies were carried out and are available in Volume 2 of the present document.

What follows is a summary of the main issues addressed through the comments and questions from First Nations on the preliminary EIS. Only a summary is presented below. HML appreciates the substantial level of comments made and questions asked, which were numerous: NIMLJ had 50 questions; NNK 103 questions; and the IN submitted 60 questions. These allowed for important improvements to the Final EIS.

Comments from NIMLJ Representatives

A first set of general comments were made, including request to detail the Project justification. Several questions concerned the involvement of NIMLJ in communications and consultations for the EIS, and a question was about the role and efficiency of the HSE Committee and communications during the Howse Project. One question was about how HML intended to communicate with its contractors to ensure that they will also apply the health, safety and environmental policies, as some NIMLJ had noted non-conformities by contractors. No less than 15 questions were about air quality in the area, and 8 questions concerned water quality and fish habitat. A question was raised in relation to work conditions at the mine site, in particular for the inclusion of women in the workforce.

Several questions pertained to access to land, traditional activities, and comments were appended to the main document submitted by NIMLJ regarding contemporary land-use of the Innu for inclusion in the EIS. The preservation of Kauteitnat was also raised as a concern, and a few questions were about the visual effects of the Project. Finally, several comments made regarded cumulative effects, and again, the importance of communications relative to cumulative effects was reiterated.

Comments from NNK Representatives

NNK questions dealt with a variety of issues, beginning with technical questions on the Project itself, on the mine site, stock piles, grade of material, and acid rock drainage. Several questions concerned air quality (9, including questions on climate), and over 15 questions pertained to water quality, and another five on fish and fish habitat.

An additional 16 questions dealt with wildlife, including caribou, avifauna, and small mammals. A few questions concerned traditional activities, access to land and road safety. Socioeconomic concerns was also of importance, as questions were asked regarding employment and contract opportunities, training, adaptation of work conditions for families, and initiatives for women, youths and cultural awareness. Finally, a few questions tackled IBAs, cumulative effects, monitoring and reporting, as well as site rehabilitation.

Comments from IN Representatives

Globally, most of the questions by the IN focused on methodological considerations of the effects assessment and cumulative effects assessment, as well as of the land-use study carried out in the context of the Howse Project. The IN document began with general comments on various issues, including the EIS methodology, air quality, traditional land-use and the George River Caribou Herd. These were complemented by sixty detailed questions on:

- The Howse Project undertaking;
- The EIS methodologies;
- Land-use and ATK, including on the land-use study carried out for the purpose of the Howse Project, and about First Nations concerns regarding land-use (approximately 10 questions);
- Agreements with First Nations.

Air quality was also a significant theme for which the IN requested clarifications (9 questions total, including a general comment, a question on GHG, and on the relation with human health). Other questions concerned noise, light, and wildlife. Another set of questions focused on socioeconomic issues, such as employment and work conditions. Finally, there were a few questions on reclamation and on the closure plan.

4.3.2.3 Feedback on Mitigation Measures by Local Aboriginal Groups

In the context of the environmental effect assessment for the Howse Project, a number of mitigation measures were proposed as normally required in EISs. Given that the Project's effects are mostly felt at the local level, discussions with NIMLJ and NNK representatives were held to validate the proposed measures.

Feedback Received from the NIMLJ

One meeting was held with NIMLJ representatives in August 2015 to discuss the comments made in writing on the EIS draft. The representatives indicated that they were pleased regarding the availability of the Timmins-Kivivik bypass road, although they mentioned that it took a long time for HML to complete it. Many comments were made on the land-use map and these comments are integrated in this current version as previously indicated (Figure 4-1). The NIMLJ's feedback included corrections on areas of particular concern for waterfowl, wildlife hunting locations that seemed to be missing, and they also clarified their need to extend the bypass road network to maintain easy access to Rosemary Lake area.

Another discussion was held at the beginning of November 2015 to specifically discuss main concerns raised by community representatives and members, and HML's proposed mitigation measures. The feedback received from NIMLJ representatives on these mitigation measures was overall positive, except for certain suggestions for further improvements. HML reiterated during the meeting that it remains open to further suggestions, which can be discussed at future HSE Committee meetings, or at another time that is convenient, which was acknowledged and appreciated.

This feedback, which includes that of the NNK given the close similarities in issues and concerns raised, is presented in Table 4-13.

NNK Representatives

A discussion was held by teleconference at the beginning of November 2015 to specifically discuss main concerns raised by community representatives and members, and HML's proposed mitigation measures. HML's mitigation measures were generally well-received by the NNK representative, who was in agreement with the measures, without precluding the possibility to suggest other measures in due course. Suggestions made during the discussion for further improvements were noted. HML reiterated during the meeting that it remains open to further suggestions, which can be discussed at future HSE Committee meetings, or at another time that is convenient, which was acknowledged and appreciated.

Table 4-13 Summary of Main Issues Raised by Local First Nations, Measures by HML and Feedback Received (November 2015)

THEME	ANSWERS / MEASURES	FIRST NATIONS FEEDBACK RECEIVED
Access to the land	<ul style="list-style-type: none"> ▪ Upgrades to the Timmins-Kivivik bypass road were completed in Summer 2015; and ▪ Access to active mining roads will continue to be controlled for safety reasons. Active mining roads should not be used by the land users since an alternative bypass road is available. If a land user requires access a specific area not accessible from the bypass road, HML/TSMC will provide a safety escort. 	<ul style="list-style-type: none"> ▪ Bypass road to Howells River is needed, via Pinette Lake; ▪ More signage on bypass road is required to guide drivers; ▪ TSMC should continue snow removal to the Rosemary Lake bridge during Goose Break in May to give road access to local hunters

THEME	ANSWERS / MEASURES	FIRST NATIONS FEEDBACK RECEIVED
Agreements	<ul style="list-style-type: none"> ▪ IBAs signed with the local leadership contain a number of tangible commitments, are legally-binding and are confidential. Specific questions on the IBAs should be taken up with local authorities; ▪ Given the change in circumstances whereby HML acquired 100% of the Howse deposit and LIM obtained Court protection under the CCAA, and the acquisition of 100% of the Howse deposit by TSMC, it is the intention of HML/TSMC to incorporate the Howse deposit into its IBAs with Aboriginal groups; and ▪ Periodic updates are provided by way of radio announcements and bulletins to community members on the progress of the DSO and Howse Projects, mining activities, and on the numerous benefits to the community. 	<ul style="list-style-type: none"> ▪ Community members can consult agreements at Nation office; ▪ Ongoing discussions on transfer of Howse to TSMC IBA; ▪ Important to continue with communications, jointly with Nation representatives.
Air quality and Cleanliness	<p>HML has /will :</p> <ul style="list-style-type: none"> ▪ Install an air quality measurement unit in Schefferville once specifications advised by the Government of Québec are confirmed; ▪ Apply water, via its Innu contractor, Mamu Construction, to road between DSO Project Site and Schefferville during dry periods to avoid dust generation as much as possible; ▪ Begun reducing its workforce as the construction of the DSO Project nears completion, thus reducing traffic and dust generation; ▪ Since Summer 2015, begun transporting freight by train between Schefferville and the DSO site, which will help diminish dust in town; ▪ Since Summer 2015, coordinated an improved system for transportation of merchandise and workers by bus; ▪ Redesigned the Howse Project to further reduce the height of the waste rock piles and to return a portion of the waste rock to the Howse pit; ▪ A wash bay operated by TSMC at DSO site between May and October, which all vehicles must use; ▪ Been collaborating with the authorities responsible for local road infrastructure within the Government of Québec (Secrétariat au Plan Nord, Ministère des Affaires municipales et Occupation du territoire, Ministère des Transports) and the Town of Schefferville regarding paving of streets, including Chemin de la Gare, Knob Lake, Laurentide, Wishart and Atlantic. According to information obtained by the government, it is envisaged that the paving will take place in 2016, at same time as works on road to Kawawachikamach. 	<ul style="list-style-type: none"> ▪ To be more effective, TSMC wash bay should be moved to the DSO Timmins site exit/entry point ▪ NIMLJ would like to see the main road on the reserve paved as part of the paving project – will need to be coordinated with responsible parties
Caribou and other resources	<ul style="list-style-type: none"> ▪ Since 2009, caribou sightings within the LSA have been rare. The GRCH has experienced unprecedented declines throughout its range, and in tandem with other caribou populations across North America, commencing in 2010. Causes for this decline are generally unknown but commonly attributed to habitat loss and/or climate factors. Local activities cannot be directly attributed as the cause of this continental trend; ▪ As discussed in the Howse EIS, some time prior to 2010, caribou calving areas migrated more than 230 km east from their original location near Schefferville 	<ul style="list-style-type: none"> ▪ Local communities would like to be involved in the monitoring if caribou are found to be in the vicinity over the Howse/DSO Project. ▪ No other comments because no other projects operating in region.

THEME	ANSWERS / MEASURES	FIRST NATIONS FEEDBACK RECEIVED
	<p>and so there is negligible potential for the Howse Project to interact with this sensitive life stage;</p> <ul style="list-style-type: none"> ▪ The Proponent recognizes that the GRCH can, one day, return to its original grounds and includes, in its mitigation measures, a commitment to be aware of any caribou seen within a 100 km radius of Howse activities, conduct surveys if collared caribou are found within 20 km of Howse and cease all activities if caribou are known to be within 5 km of the active pit or the processing complex; ▪ HML/TSMC contributes to a compensation fund as specified in certain IBAs⁴, as per priorities identified, for subsistence activities. First Nation leadership determines how the funds are allocated and used. This fund contributes to alleviating the financial burden for families who count on subsistence harvesting for its economic and nutritive value, in an area where store-bought food is expensive, such as for a fuel allocation for all members; ▪ HML/TSMC, the biggest private contributor to the Caribou Ungava project, will pursue its financial participation in the program to advance research on caribou and on the effects of mining activities on the George River herd decline, and on other factors that may play a role in this decline. Researchers will involve the concerned Aboriginal communities by considering their views, their traditional indigenous knowledge in the studies and by involving them in the research activities held on their traditional territories; ▪ Sightings of caribou will be reported to the HSE Committee; ▪ HML will announce on the local radio stations blasting activities two days ahead of time; and ▪ In collaboration with the HSE Committee, and in some cases with local authorities, mining activities will be adapted if needed to minimize the effects on traditional activities. 	
Communication	<p>HML has /will :</p> <ul style="list-style-type: none"> ▪ Support the work of the IBA Implementation Committees; ▪ Provide Project information via radio updates and newsletter; ▪ Work with the local Councils to improve communication to community members on a periodic basis; ▪ Include the Howse Project in TSMC's HSE Committee; ▪ Maximize the presence of Aboriginal personnel for all security shifts to facilitate communication in Innu with local lands users; 	<ul style="list-style-type: none"> ▪ Suggest to provide pictures to First Nation representatives that illustrate monitoring and mitigation measures to assist them in providing explanations to with community members

⁴ Local leadership have determined in each of their respective IBAs their needs in regard to land-use. As such, said compensation funds vary according to the IBA. However, in all cases, HML provides funds but each local leadership is responsible for funds management and allocation.

THEME	ANSWERS / MEASURES	FIRST NATIONS FEEDBACK RECEIVED
	<ul style="list-style-type: none"> ▪ Provide cultural awareness to all staff and language training to personnel who require it in their day-to-day tasks; ▪ Work with the local communities to hold a Security course for its members, so that there are additional Innu personnel at the security post; and <p>HML contact information may be found in Band Councils. HSE Committee members may also provide contact information.</p>	
Cumulative Effects	<ul style="list-style-type: none"> ▪ HML will continue to address all HML/TSMC mining matters (Howse, Goodwood, DSO) under the aegis of the HSE Committee to monitor impacts and cumulative effects of mining operations; ▪ Continue to participate in the Regional Steering Committee on Mining Issues (Schefferville), and the Labrador West Regional Task Force, and collaborate with other mining companies operating in the region to assess, address and monitor cumulative effects relating to mining; ▪ Legislation requires financial guarantees from mining companies to ensure that all rehabilitation works are completed, while the Howse Rehabilitation and Closure Plan will require First Nation approval; ▪ Continue to adhere to the Joint Emergency Preparedness Plan and collaborate with communities and other mining companies in doing so; ▪ Continue to collaborate in the Ungava Caribou research program in order to assess cumulative effects of mining on the GRCH; ▪ Work with mining associations and government to discuss and address cumulative effects issues; and <p>Work with governments and communities to prepare a map showing all mining projects (proposed and ongoing), and which will guide land-users in harvesting resources in safe locations. These maps will be posted in public places.</p>	<ul style="list-style-type: none"> ▪ Agree with measures – may suggest other measures in due course.
Cumulative Effects	<ul style="list-style-type: none"> ▪ HML will continue to address all HML/TSMC mining matters (Howse, Goodwood, DSO) under the aegis of the HSE Committee to monitor impacts and cumulative effects of mining operations; ▪ Continue to participate in the Regional Steering Committee on Mining Issues (Schefferville), and the Labrador West Regional Task Force, and collaborate with other mining companies operating in the region to assess, address and monitor cumulative effects relating to mining; ▪ Legislation requires financial guarantees from mining companies to ensure that all rehabilitation works are completed, while the Howse Rehabilitation and Closure Plan will require First Nation approval; ▪ Continue to adhere to the Joint Emergency Preparedness Plan and collaborate with communities and other mining companies in doing so; ▪ Continue to collaborate in the Ungava Caribou research program in order to assess cumulative effects of mining on the GRCH; ▪ Work with mining associations and government to discuss and address cumulative effects issues; and 	<ul style="list-style-type: none"> ▪ Agree with measures – may suggest other measures in due course.

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	<p>Work with governments and communities to prepare a map showing all mining projects (proposed and ongoing), and which will guide land-users in harvesting resources in safe locations. These maps will be posted in public places.</p>	
Economic benefits	<p>HML/TSMC has/will:</p> <ul style="list-style-type: none"> ▪ In place IBAs that ensure that a share of the economic benefits remain in the Schefferville area, including priority hiring and contracting; ▪ Awarded hundreds of millions of dollars in contracts to local Aboriginal businesses since the beginning of the DSO Project; ▪ Continue to provide information on all employment and contracting opportunities; ▪ Continue to support the establishment of local businesses and capacity-building; ▪ Continue to adapt the bidding process to the size of some of the local businesses, where possible divide big contracts into smaller ones; ▪ Continue to collaborate with the responsible authorities for local road infrastructure within the Government of Québec (Secrétariat au Plan Nord, Ministère des Affaires municipales et Occupation du territoire, Ministère des Transports) and the Town of Schefferville regarding paving of streets, including chemin de la Gare, Knob Lake, Laurentide, Wishart and Atlantic. According to information obtained by the government, it is envisaged that the paving will take place in 2016, at same time as works on road to Kawawachikamach and ▪ Continue to meet with Aboriginal representatives to review IBA implementation. Significant benefits have flowed to Innu and Naskapi businesses since the beginning of the DSO Project, including to: Autobus Tshiuetin, Pétroles Naskinnuk, Construction Mamu, Innutel, TSH, Sodexo, Garage Montagnais, Nirinnu, Naskapi Heavy Machinery, Naskapi Imuun, and others. 	<ul style="list-style-type: none"> ▪ Agree with measures – may suggest other measures in due course.
Employment and Training	<p>HML/TSMC has/will:</p> <ul style="list-style-type: none"> ▪ Close to 150 Innu and Naskapi were working on the DSO Project (September 2015), representing close to 15% of the Project workforce. This rate is expected to increase once the construction period ends and there are less outside trades workers; ▪ HML/TSMC has a strict zero tolerance policy with regard to discrimination and harassment, which is presented to all workers during site orientation and which includes steps to take in the case of harassment; ▪ Maintain jobs through the Howse Project; ▪ Continue to train and promote Aboriginal workers in the workplace, and which will continue to be required of all contractors; ▪ Continue to support essential skills training and ensure its accessibility in the area; ▪ Continue to provide access to adequate technical training according to job needs as per IBA commitments; 	<ul style="list-style-type: none"> ▪ Agree with measures – may suggest other measures in due course.

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	<ul style="list-style-type: none"> ▪ Provide mechanisms through which Aboriginal workers may access qualified positions and obtain promotions (in progress); ▪ Offer an alternating schedule to local workers when work schedules can allow it; ▪ Continue to provide training equitably for both male and female staff; ▪ Continue to provide Cultural Awareness and Respectful Workplace training program for all its employees; ▪ Delivered a custom-designed training in Process Plant Operations to 3 Québec First Nations in spring 2015, which included English classes for Innu students. Many graduates have since been hired to work on the DSO Site; ▪ Employs women at a rate of over 10% of its Project Workforce and will continue to favour women who have the required skills and qualifications; ▪ Employs numerous Aboriginal women in non-traditional roles including heavy equipment operators, plant operators, security officers; ▪ Coordinate more training in collaboration w/ community in fields related to mining industry; ▪ Continue to support Innu staff in improving their English skills on-the-job, given that the worksite is in Labrador and primarily English-speaking; ▪ Deliver language training to personnel who require it in their day-to-day tasks; ▪ A clear complaint mechanism. In fact TSMC encourages workers who feel discriminated upon to speak out so that problems may be solved; and ▪ Continue to participate in local career fairs. 	
Kauteitnat	<ul style="list-style-type: none"> ▪ HML recognizes the historical and cultural significance of Kauteitnat, which is why it is considered a sensitive area by the Proponent; ▪ A buffer zone of 500 m will be maintained between the bottom of Irony Mtn and the Howse footprint. This distance was established based on the local of the iron deposit, an on-site meeting with trapline holder family representatives, and design criteria to set the maximum distance between the mountain and feasible mine activities, infrastructure and components; ▪ HML has optimized the Project design to minimize effects in the vicinity of Kauteitnat, including the visual impact, through reduced waste rock pile heights and progressive in-pit filling; ▪ As per discussions between TSMC and NML, it is envisaged that the mining claims covering Irony Mountain will be transferred to the local communities by the GNL and designated as a no-mining are; and <p>Proper archaeological investigations have been carried out for both DSO and the Howse Project. After verification, there was no burial found on Kauteitnat.</p>	<ul style="list-style-type: none"> ▪ Agree in principle with measures, but will require further analysis
Rehabilitation	<ul style="list-style-type: none"> ▪ LIM is subject to the Newfoundland and Labrador Mining Act with respect to rehabilitation of mining sites; 	<ul style="list-style-type: none"> ▪ Agree with measures – may suggest other measures in due course.

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	<ul style="list-style-type: none"> ▪ All rehabilitation and closure works are fully covered as per the requirements of the Newfoundland and Labrador Mining Act; ▪ The rehabilitation and closure plan for the Howse Project will be completed to the satisfaction of the Aboriginal groups prior to HML applying for the release certificate from the GNL; ▪ HML will inform in advance local businesses of contracting opportunities for the decommissioning and reclamation phase; and ▪ Rehabilitation works of DSO pits will begin in 2016 (Timmins 4). 	
Road safety	<p>HML has/will:</p> <ul style="list-style-type: none"> ▪ Continue to participate in the Regional Steering Committee on Mining Issues (Schefferville) which has discussed this matter and identified solutions; ▪ Continue to maintain the multi-user road between the Schefferville landfill and the DSO site, including safety signage; ▪ Installed in 2015 road safety signage on the road between Schefferville and the DSO site, including for the new railway. Additional bilingual road safety signs, including speed limits, messages on safe driving, beacon lights, will be installed in spring 2016, in collaboration with the Town of Schefferville and the Sûreté du Québec. This will assist the SQ in enforcing driving laws; ▪ Speed limit will be maintained at 70 km/hour on the multi-user road north of the Schefferville landfill, and at 50 km/hour between the Schefferville landfill and the town of Schefferville. The speed limit will apply to all road users. Respect of applicable speed limits will be monitored by HML and by the Sûreté du Québec; ▪ Continue to raise awareness among workers on importance of safe driving. Measures are taken for detractors found disobeying traffic laws, and witnesses of road safety violations are asked to report details. 	<ul style="list-style-type: none"> ▪ Suggest increased enforcement by HML/TSMC security personnel on the multi-user road between the DSO Site and Schefferville
Water quality	<ul style="list-style-type: none"> ▪ The water regime of Pinette Lake was analyzed in 2015. This work was undertaken to anticipate the change in water level resulting from a decrease of 4% in its watershed. Given the drainage form of the lake and a slight decrease in flow, the level of Pinette Lake is not expected to decrease by more than 2 mm, which would be in the spring. The water level in the Summer will continue to vary as before the Project; ▪ Since Pinette Lake will not receive any discharge water from the Howse mine (from drainage or treatment), the lake will not change colour and its water quality will remain the same. Regarding Rosemary Lake, which is at a much lower elevation and connected to the Howells River, the discharge water directed to Burnetta and Goodream creeks will flow into it. At its entry point, the discharge water will be highly diluted, however, i.e. 1/73, and the water will be clear at the lake exit point; ▪ Fish are not expected to be affected by the Howse Project. The Human Health Risk Assessment completed in October 2015 modelled the risk of fish consumption on human health, and concluded that the potential 	<ul style="list-style-type: none"> ▪ Agree in principle with measures, but will require further analysis.

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	<p>affect to human health was very low. During Howse operations, aquatic fauna (fish and benthic invertebrates) will be monitored in accordance with the Metal Mining Effluence Regulations;</p> <ul style="list-style-type: none"> ▪ Regarding spills that are reasonably expected to occur, there are safeguards in place: a spill response plan on which HML workers are regularly trained; spill kits are readily available equipped in trucks for spills to be contained quickly and not reach water bodies; and ▪ As mentioned in the EIS, Section 7.3.10, the only risk of groundwater contamination relates to nitrate and nitrite. Since there are no drinking water wells near the Project, this was not considered an issue. Therefore, mitigation measures were not proposed for this possible contamination. However, numerous current measures have been written with a view to reducing the amount of residual ammonium in surface water following the use of explosives. Ammonium is a form of nitrogen that quickly turns to nitrate. These measures can be found in Section 7.3.10.3, regarding drilling and blasting. 	