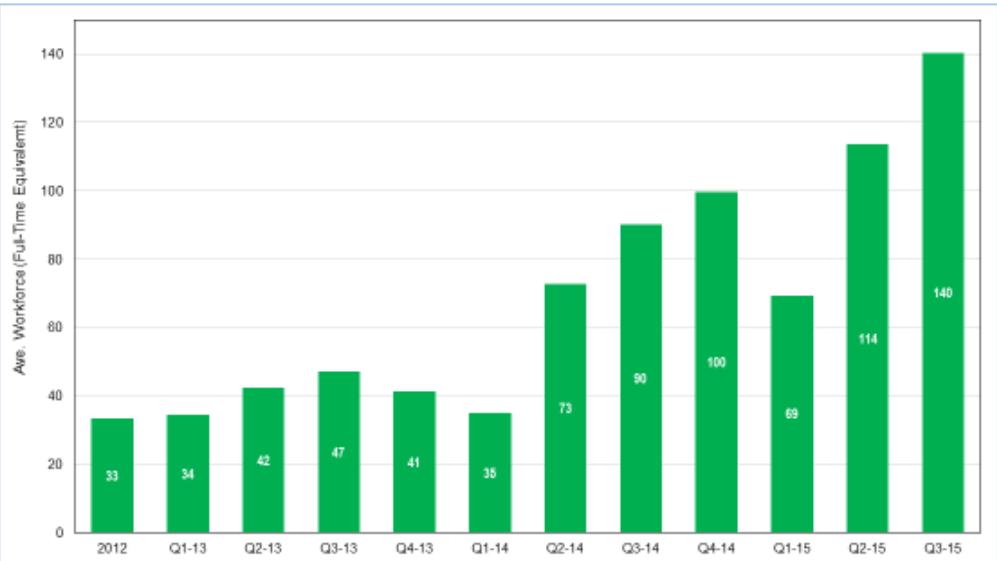


Howse Property EIS


Proponent Answer to CEEA 3, Part 2, Round 2




THEME	MMMENTS MADE DURING COMMUNITY CONSULTATIONS (NIMLJ AND NNK)	COMMENTS MADE BY LAND-USERS (NIMLJ AND NNK) AND BY TRAPLINE HOLDERS (ITUM)	PROPONENT'S CONSIDERATION OF THE COMMENTS	REMAINING CONCERNS
Access to Land	<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 	<ul style="list-style-type: none"> ▪ At the request of local First Nations Communities, the Proponent has upgraded an existing IOCC road and therefore made available the Timmins-Kivivik bypass road since August 2015. The Timmins-Kivivik bypass road was an existing road that was in disrepair, built by IOCC, and was upgraded in consultation with First Nations. The Proponent does not assume ownership of this road, but is committed to its maintenance bi-annually in order to continue to accommodate First Nation's access to the land. With this mitigation measure, the Proponent is also on the same breath providing additional access to the Howells River and Pinette Lake via a bypass road: The North Road – Greenbush bypass road; ▪ The North Road – Greenbush bypass road already exists in its entirety as it is an existing road that was built by IOCC. It connects to the Timmins-Kivivik bypass road via the Greenbush crossing to Triangle Lake, then to the Howells River and Pinette Lake, using an existing historic road between the planned Howse Pit and Irony Mountain. The Proponent does not assume ownership of this road, but is committed to its maintenance bi-annually in order to continue to facilitate First Nations access to the land; ▪ There will be no blasting when Indigenous groups are using Kauteitnat. Knowledge of upcoming blasting events 2 days in advance should help to plan activities around Kauteitnat; ▪ Indigenous groups can practice their traditional activities on Kauteitnat in a noise-free environment; ▪ HML recognizes that the North Road – Greenbush bypass that it will maintain is approximately 16 km longer than the pre-project access route. As such, HML is prepared to offer financial compensation for this additional cost, via a traditional fund/compensation fund. 	
Agreements	<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. 	<ul style="list-style-type: none"> ▪ Despite regrets, the proponent would like to highlight that it has consistently provided jobs, benefits and training and capacity development. <p><u>Excerpt from TSMC presentation:</u></p>	



THEME	MMMENTS MADE DURING COMMUNITY CONSULTATIONS (NIMLJ AND NNK)	COMMENTS MADE BY LAND-USERS (NIMLJ AND NNK) AND BY TRAPLINE HOLDERS (ITUM)	PROPONENT'S CONSIDERATION OF THE COMMENTS	REMAINING CONCERNS																										
			<p>CONSISTENT JOBS CREATED FOR FIRST NATIONS</p>  <p>Indigenous community employment</p> <table border="1"> <thead> <tr> <th>Year/Quarter</th> <th>Ave. Workforce (Full-Time Equivalent)</th> </tr> </thead> <tbody> <tr><td>2012</td><td>33</td></tr> <tr><td>Q1-13</td><td>34</td></tr> <tr><td>Q2-13</td><td>42</td></tr> <tr><td>Q3-13</td><td>47</td></tr> <tr><td>Q4-13</td><td>41</td></tr> <tr><td>Q1-14</td><td>35</td></tr> <tr><td>Q2-14</td><td>73</td></tr> <tr><td>Q3-14</td><td>90</td></tr> <tr><td>Q4-14</td><td>100</td></tr> <tr><td>Q1-15</td><td>69</td></tr> <tr><td>Q2-15</td><td>114</td></tr> <tr><td>Q3-15</td><td>140</td></tr> </tbody> </table> <p>TATA STEEL MINERALS CANADA LIMITED</p> <ul style="list-style-type: none"> TSMC has concluded life-of-mine IBAs and Co-operation Agreements with 5 Indigenous Communities, a pioneering work. <p>TSMC has developed substantial social and economic benefits, which are packaged through the IBAs:</p> <ul style="list-style-type: none"> Employment for First Nations citizens including training; Contracts with First Nations Contractors; Restoration of Community facilities; Promoting Arts, Health, Education, Culture; Rehabilitation and restoration of mining sites beyond compliance to best practices; Benefits linked to business progress. 	Year/Quarter	Ave. Workforce (Full-Time Equivalent)	2012	33	Q1-13	34	Q2-13	42	Q3-13	47	Q4-13	41	Q1-14	35	Q2-14	73	Q3-14	90	Q4-14	100	Q1-15	69	Q2-15	114	Q3-15	140	
Year/Quarter	Ave. Workforce (Full-Time Equivalent)																													
2012	33																													
Q1-13	34																													
Q2-13	42																													
Q3-13	47																													
Q4-13	41																													
Q1-14	35																													
Q2-14	73																													
Q3-14	90																													
Q4-14	100																													
Q1-15	69																													
Q2-15	114																													
Q3-15	140																													
<p>Air quality and Cleanliness</p>	<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 	<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. 	<p>Dust</p> <ul style="list-style-type: none"> A wash bay is available on site. In addition, before leaving the site, all vehicles are monitored by security and there is a policy in place that prevents vehicles that are not clean from leaving the site to go to Schefferville; Further, in 2016, the Proponent implemented a policy which restricts 90% of its vehicles from travelling to Schefferville. Of those 10% with special authorization to travel to Schefferville, they do so to go to the airport (which does not pass through the aboriginal community) or in the course of the work of environmental technicians or for logistical purposes. More vehicles will travel, occasionally, during shift changes (1 day every 2 weeks). It can be logically assumed that this mitigation measure reduces the dust incurred by vehicles travelling to and from the site by approximately 90%. The Proponent will continue this policy throughout the Howse Property Project Operations phase. <p>The following 40 sensitive receptors were included in the air modelling study. Note that: 36. Kawawachikamak (Town), 37. Lac John (Town), 38. Matimekush (Town) and 39. Schefferville (Town) were all included in the assessment.</p> <ol style="list-style-type: none"> Young Naskapi Camp 1 Young Naskapi Camp 2 Innu Tent 3 (Rosemary Lake) 	<ul style="list-style-type: none"> 																										

THEME	COMMENTS MADE DURING COMMUNITY CONSULTATIONS (NIMLJ AND NNK)	COMMENTS MADE BY LAND-USERS (NIMLJ AND NNK) AND BY TRAPLINE HOLDERS (ITUM)	PROPONENT'S CONSIDERATION OF THE COMMENTS	REMAINING CONCERNS
	<p>limits to control traffic, as was done by IOC.</p>		<ol style="list-style-type: none"> 4. Innu Tent 4 (Rosemary Lake) 5. Innu Tent 5 (Rosemary Lake) 6. Innu Tent 6 (Rosemary Lake) 7. Innu Tent 1 (Elross Lake) 8. Innu Tent 2 (Exact location tbd) 9. Young Naskapi Camp 7 (Pinette Lake) 10. Young Naskapi Camp 3 11. Young Naskapi Trailer tent (Triangle Lake) 12. Young Naskapi Camp 5 (Elross Creek) 13. Naskapi - Uashat people's camp 14. Young Naskapi Camp 4 15. Young Naskapi Camp 6 (Howells River) 16. Innu - Uashat - Mani-Utenam Camp 1 17. Innu - Uashat - Mani-Utenam Camp 2 18. Innu - Uashat - Mani-Utenam Camp 3 (Inukshuk Lake) 19. Innu Cabin 1 20. Innu Cabin 2 21. Bustard - Observation and hunting site 1 22. Bustard - Observation and hunting site 2 23. Picking site (berries / tea) 24. Irony Mountain 25. Innu Cabin 3 26. Innu Cabin 4 27. Innu Cabin 5 28. Innu Cabin 6 29. Innu Cabin 7 30. Innu Cabin 9 (Denault Lake) 31. Innu Cabin 8 32. Innu Cabin 10 (Vacher Lake) 33. Naskapi Cabin 1 34. Naskapi Cabin 2 (Elross Lake) 35. Naskapi Cabin 3 (Elross Lake) 36. Kawawachikamak (Town) 37. Lac John (Town) 38. Matimekush (Town) 39. Schefferville (Town) 40. TSMC Workers' Camp 	
<p>Caribou and other resources</p>	<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. 	<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. 	<p>Caribou</p> <ul style="list-style-type: none"> ▪ HML concurs that caribou will avoid areas where there is active mining for a distance of 15 km; ▪ According to the director of Caribou Ungava (Côté 2014, personal communication), no radio-collared individual of the GRCH are present in the LSA; ▪ 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; ▪ Under an agreement with the Ungava project and CARMA, TSMC's Environmental Specialist / Permit Manager will be notified when migratory tundra caribou, which are monitored via satellite collars, come within 100 km of the Howse Project. Upon receipt of such a notice, operations will continue with caution. If data from the radio collars indicate that some of the caribou have moved to within 20 km of the Howse Project, TSMC will institute surveys within that radius to monitor their movements in greater detail. <p><u>Update on the GRCH</u></p>	<ul style="list-style-type: none"> ▪ Food in the supermarket is expensive.

THEME	MMMENTS MADE DURING COMMUNITY CONSULTATIONS (NIMLJ AND NNK)	COMMENTS MADE BY LAND-USERS (NIMLJ AND NNK) AND BY TRAPLINE HOLDERS (ITUM)	PROPONENT'S CONSIDERATION OF THE COMMENTS	REMAINING CONCERNS
	<ul style="list-style-type: none"> People need to go further to harvest food and other resources, including caribou, grouse and berries. 	<ul style="list-style-type: none"> The long-term use of land to practice traditional activities by young First Nations is important. 	<ul style="list-style-type: none"> There is a serious decrease in the size of the population that began in the late 90's and accelerated around 2001; The last population size estimate provide in the EIS is 14, 200 animals in 2014. Since then, the wildlife division has indicated to the Proponent that the herd has declined further by 30%, to 10, 200 animals in 2015; GNL's Environment and Conservation issued a statement in August 2016 that the size of the herd has further decreased to 8, 938 animals based on a July 2016 survey. This statement also states that: "This long-term decline has been attributed to deterioration in habitat conditions, food resources, predation and climate change"; There is a hunting ban on caribou from the GRCH herd that will be maintained for the foreseeable future; The current areas used by the GRCH are located far from the traditional hunting grounds (see map to CEEA 82); Caribou, which have been absent from the area for several years, and so are not harvested, are not likely to return to the area naturally (e.g. their population is not expected to stabilize in the near future) nor will they return as a result of the habitat disruption from the Project. (Answer to CEEA 55, Round 2, Part 2); Furthermore, GNL's Environment and Conservation statement says that: "At the current rate of decline and without immediate cessation of illegal hunting, biologists predict this herd could become functionally extirpated in less than five years, meaning that the herd will become so small it will essentially lose its capacity to recover." <p>Land access</p> <ul style="list-style-type: none"> HML recognizes that the North Road – Greenbush bypass that it will maintain is approximately 16 km longer than the pre-project access route. As such, HML is prepared to offer financial compensation for this additional cost, via a traditional fund/compensation fund; The North Road – Greenbush bypass road already exists in its entirety as it is an existing road that was built by IOCC. It connects to the Timmins-Kivivik bypass road via the Greenbush crossing to Triangle Lake, then to the Howells River and Pinette Lake, using an existing historic road between the planned Howse Pit and Irony Mountain. The Proponent does not assume ownership of this road, but is committed to its maintenance bi-annually in order to continue to facilitate First Nations access to the land; HML will continue to contribute to a fund as specified in certain IBAs for traditional activities. The Aboriginal and 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. 	
Communication	<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 	<ul style="list-style-type: none"> People wish to have more information on the project - they feel they know very little. 	<ul style="list-style-type: none"> The Proponent holds HSE meeting 3-4 times annually. During these meetings, local people's opinions are solicited and reasonable requests are accommodated Although the Proponent feels that it is the responsibility of community consultants and CEEA to explain the process (and CEEA), in all town meetings, the Proponent refers to the CEEA (Howse) website. The proceedings from HSE meetings are communicated to stakeholders on a shared drive and they may release this information at any time for their own purposes. The HSE Committee, which has been put in place by HML to collaboratively oversee and assess the effectiveness and relevance of the environmental mitigation measures for the DSO Project, will also cover the Howse Project. This Committee's purpose is to provide information to the NIMLJ and the NNK on a regular basis of the economic benefits, mitigation measures, and health and safety issues. In addition, a Regional Steering Committee on Mining issues was established as of May 2015, to oversee issues relation to mining activities in Schefferville area. This Committee meets three to four times a year and is composed of local stakeholders (Ville de Schefferville, Schefferville Airport, NIMLJ, NNK and local land-users from both communities), and of mining companies working in the area. As of 2017, all security contracts require bilingual security officers. The TSMC VP/government and stakeholder relations employee is Innu and speaks the local indigenous languages Any environmental problem can be referred to TSMC's environmental team at 514-764-6700 xt 764 There is always someone available at the gate at the general number 514-764-6700 Every year, before the start of operations, local elders are met to discuss plans related to the development of the project <p>An excerpt from a public notice indicates the name of the contact person to reach if there is a problem with TSMC:</p>	

THEME	COMMENTS MADE DURING COMMUNITY CONSULTATIONS (NIMLJ AND NNK)	COMMENTS MADE BY LAND-USERS (NIMLJ AND NNK) AND BY TRAPLINE HOLDERS (ITUM)	PROPOSER'S CONSIDERATION OF THE COMMENTS	REMAINING CONCERNS
	<p>explanations on the project, as well as more citizen participation.</p> <ul style="list-style-type: none"> Many people do not know what the CEAA is. There are many ways to reach the population – radio, Facebook, etc. 		<p>TATA STEEL MINERALS CANADA: PUBLIC NOTICE / AVIS PUBLIC </p> <p>To all local communities of Schefferville, Matimekush-Lac John and of Kawawachikamach:</p> <p>Attached is a blast notification for Timmins 7, to be conducted between 8 am and 6 pm from February 18 to February 25. The supervisor in charge is Brian Hynes. He can be contacted by email at Brian.Hynes@tatasteelcanada.com, or at TSMC radio Channel 4 or at 514-764-6700 ext. 430 or via cell: 418-585-1651. Please notify your respective parties. Thank you!</p> <p>Ceci est pour communiquer aux populations locales de Schefferville, Matimekush-Lac John et de Kawawachikamach un avis de dynamitage (utilisation d'explosifs) près de la fosse Timmins 7 et ce, pour la période couvrant le 18 février au 25 février 2017 et ce dès 8:00 am jusqu'à 18:00 pm.</p> <p>La personne en charge est Brian Hynes. Vous pouvez le rejoindre par courriel à Brian.Hynes@tatasteelcanada.com sur le Canal 4 de la radio TSMC et au 514-764-6700 ext. 430 ou par cellulaire: 418-585-1651. Soyez prudents lorsque vous êtes dans le secteur. Merci!</p> <p>TATA STEEL MINERALS CANADA LIMITED</p> <ul style="list-style-type: none"> The community can contact the Proponent anytime, but the HSE remains the most effective method and, as expressed by the Proponent, there is a standing invitation for anyone the community wishes to invite. <p><u>Citizen participation is promoted by TSMC through:</u></p> <ul style="list-style-type: none"> Tree-planting with primary school students; Site tours for students and Elders. 	
<p>Economic benefits</p>	<p>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</p>	<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. 	<p>The Proponent agrees that the effect of local contracting is positive, and HML has already put in place a range of measures to help Aboriginal businesses benefit from these contracts, such as:</p> <ul style="list-style-type: none"> Prioritize First Nation and local contractors as much as possible (in place); Allow for a first round of bidding to First Nations (in place); Adapt the bidding process to the size of some of the local businesses, where possible divide big contracts into smaller ones (in place); Support the creation of local businesses (in place, on an ad hoc basis); Provide start-up training for new business (in place, on an ad hoc basis); Provide cultural training for new enterprises (provided to all contractors hired by TSMC); Continue to prioritize Aboriginal and local contractors as much as possible; 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 provide support the creation of local businesses; Continue to provide start-up training for new business (in place, on an ad hoc basis); Continue to provide cultural training for new enterprises (provided to all contractors hired by HML). <p><u>Excerpt from a TSMC power point presentation:</u></p>	<ul style="list-style-type: none">

THEME	MMMENTS MADE DURING COMMUNITY CONSULTATIONS (NIMLJ AND NNK)	COMMENTS MADE BY LAND-USERS (NIMLJ AND NNK) AND BY TRAPLINE HOLDERS (ITUM)	PROPONENT'S CONSIDERATION OF THE COMMENTS	REMAINING CONCERNS
	<p>and Québec Innu are the ones that use the territory. Economic development is a positive effects of the project.</p> <p>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. Companies need to reinvest locally.</p>		<p style="text-align: center;">OPPORTUNITIES FOR FIRST NATIONS BUSINESSES</p> <p style="text-align: right;"></p> <p><u>Illustrative list</u></p> <div style="border: 1px solid black; padding: 5px;"> <p>Contracts to First Nation and Aboriginal communities:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Autobus Tshiuetin <input type="checkbox"/> Béton Naskinnu <input type="checkbox"/> Construction Tshiuetin <input type="checkbox"/> Locations Discount Matimekush <input type="checkbox"/> Innu Municipal <input type="checkbox"/> Innutel <input type="checkbox"/> Mamu Construction <input type="checkbox"/> Naskapi Heavy Machinery <input type="checkbox"/> Naskapi Imuun <input type="checkbox"/> Nirint Canada <input type="checkbox"/> Pétroles Naskinnuk <input type="checkbox"/> Sodexo <input type="checkbox"/> Transport Ferroviaire Tshiuetin <input type="checkbox"/> Air Inuit </div> <div style="display: flex; justify-content: space-around; align-items: center;">   </div> <p style="text-align: center;">TATA STEEL MINERALS CANADA LIMITED</p> <p style="text-align: center;">6</p>	
Employment and Training	<p>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.</p>	<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. 	<p><u>TSMC is committed to:</u></p> <ul style="list-style-type: none"> ▪ Continue to support the essential skills training and other technical training according to job needs, via on-the-job training and institutional training, as per IBA and government funding available; ▪ Provide mechanisms through which Aboriginal workers may access qualified positions and obtain promotions (in progress); ▪ Work with communities to support the delivery of early training in areas that will be required. When the construction and operation phases begin, these workers will be fully prepared and trained; ▪ Offer an alternate schedule to local workers when operational schedules allow it; ▪ Continue to provide on-the-job training equitably for both male and female staff; ▪ Continue to address issues relating to project construction and operation, including employment, training and contracting, via each individual community IBA Implementation Committee; ▪ Continue to provide Cultural Awareness and Respectful Workplace training program for workers; ▪ HML will ensure that all new employees have their beginner's handbook and appropriate health and safety training; ▪ Deliver a custom-designed training in Process Plant Operations to three 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; ▪ Continue to employ women at a rate of over 10% of its Project Workforce and continue to favour women who have the required skills and qualifications; ▪ Continue to employ Aboriginal women in non-traditional roles including heavy equipment operators, plant operators, security officers; ▪ Continue to support Innu staff in improving their English skills on-the-job, given that the worksite is in Labrador and primarily English-speaking. English language courses will be offered on-site (to come); ▪ Continue to prioritize Aboriginal and local contractors as much as possible; ▪ Continue to adapt the bidding process to the size of some of the local businesses, where possible divide big contracts into smaller ones; and ▪ Continue to provide support the creation of local businesses. <p><u>Workplace conditions program:</u></p> <p>TSMC implemented a workplace conditions program that is receptive and conducive to the social and cultural values of indigenous groups and that protects and supports such social and cultural values in the context of the Project, e.g.</p> <ul style="list-style-type: none"> ▪ Adoption and enforcement, including under penalty of termination, of a zero-tolerance policy regarding discrimination and sexual-harassment; ▪ Provision of a cross-cultural training program for all employees that aims to build understanding of cultural differences and is intended to foster healthy working relationships through, amongst other things, education on culture and traditions; 	<ul style="list-style-type: none"> ▪ Some workers do not know their rights (e.g., CSST). There is no labour organization for Québec workers. Cross-border problems are significant.

THEME	MMMENTS MADE DURING COMMUNITY CONSULTATIONS (NIMLJ AND NNK)	COMMENTS MADE BY LAND-USERS (NIMLJ AND NNK) AND BY TRAPLINE HOLDERS (ITUM)	PROPONENT'S CONSIDERATION OF THE COMMENTS	REMAINING CONCERNS
	<p>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.</p>	<ul style="list-style-type: none"> There should be better monitoring and communication on jobs and promotions. People are glad that there will be job opportunities again. 	<ul style="list-style-type: none"> Provision, in consultation with indigenous groups, of culturally-sensitive counselling and support programs for members of the Project Workforce to promote individual and family well-being, including on such matters as family separation, money management, life skills, alcohol/drug and gambling education/awareness (forthcoming); Subject to safety and security requirements, the use of Aboriginal Language by Aboriginal members of the Project Workforce is not prohibited. The vast majority of the people involved in the last Mining Essential Training Program were aboriginal women <p><u>Excerpt from TSMC Power Point presentation:</u></p> <div data-bbox="1081 572 1734 606" style="text-align: center;"> <h3>FIRST NATIONS CAPACITY DEVELOPMENT</h3> </div> <div data-bbox="1982 560 2063 633" style="text-align: right;">  </div> <div data-bbox="1081 661 1703 1257" style="border: 1px solid blue; padding: 5px;"> <p>Multiple training programs have been delivered to First Nation members that relate to the mining industry including, many of which have been funded by TSMC, in collaboration with federal and provincial agencies:</p> <ul style="list-style-type: none"> ✓ Heavy Equipment Operator - over 50 graduates from Matimekush-Lac John and Kawawachikamach. ✓ Truck Driver Training - approximately 20 graduates. ✓ Workplace Essential Skills – ongoing since 2011 in Kawawachikamach and over 25,000 hours of instruction delivered. ✓ Adult Education – ongoing since 2013 in Matimekush and ~ 20 participants working towards their high school diploma. ✓ Iron Ore Processing and Safe Work Practices – nearly 30 graduates from the NIMLJ, NNK and ITUM. ✓ Security Officer – 10 Naskapis certified to work in QC and NL. ✓ Carpentry Training – 7 graduates from Kawawachikamach. ✓ Mining Essentials – 32 participants from Matimekush & Kawawachikamach. </div> <div data-bbox="1721 661 2063 1257" style="display: flex; flex-direction: column;">   </div> <div data-bbox="1081 1278 1659 1312" style="text-align: center;"> <h3>TATA STEEL MINERALS CANADA LIMITED</h3> </div> <div data-bbox="2045 1286 2063 1306" style="text-align: right; font-size: small;"> 12 </div>	<ul style="list-style-type: none"> The Proponent would like to state that there is a training center in Sept-Îles – but that there needs to be a population base for this to be viable (which is currently not the case in the Schefferville region). TSMC will contribute financially to this aboriginal training centre in Sept-Îles

THEME	MMMENTS MADE DURING COMMUNITY CONSULTATIONS (NIMLJ AND NNK)	COMMENTS MADE BY LAND-USERS (NIMLJ AND NNK) AND BY TRAPLINE HOLDERS (ITUM)	PROPONENT'S CONSIDERATION OF THE COMMENTS	REMAINING CONCERNS
Environment		<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. 	<ul style="list-style-type: none"> The Howse Property EIS provides a complete assessment of the potential environmental effects of the Howse Project on biophysical components; The Proponent holds HSE meeting 3-4 times annually. During these meetings, local people's opinions are solicited and reasonable requests are accommodated; The environmental monitoring and follow-up plans presented in the Howse EIS (Chapter 9) are presented for all VCs of the Howse EIS and they are designed to clarify some of the uncertainties inherent to the assessment process as well as to ensure that the Howse Project does not affect the VCs more than anticipated in the present document. Namely, the Proponent is committed to obtaining field data for those components which were assessed based on theoretical data; TSMC's Environmental Protection Plan (Volume 1 Appendix Ia of the Howse EIS) describes commitments to air, noise, surface/ground water monitoring as well as avifauna, fish and fish habitat, harvested animals, and caribou; During the last year of operations, the Proponent will conduct and evaluation the results of all of the environmental monitoring activities conducted on the Howse Project activities during the Operations phase. These results will allow the Proponent to adapt the closure and follow up program to the specific environmental issues identified for the Howse site. Any such environmental issue identified during the Operations phase will be targeted in order to improve the efficiency of the follow up program. Any issues or exceedances identified during the follow up program will be addressed in compliance with and applicable regulations and standards as well as in cooperation with local community. 	<ul style="list-style-type: none">
Health	<p>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.</p>	<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. 	<p>Dust</p> <ul style="list-style-type: none"> A wash bay is available on site. In addition, before leaving the site, all vehicles are monitored by security and there is a policy in place that prevents vehicles that are not clean from leaving the site to go to Schefferville; Further, in 2016, the Proponent implemented a policy which restricts 90% of its vehicles from travelling to Schefferville. Of those 10% with special authorization to travel to Schefferville, they do so to go to the airport (which does not pass through the aboriginal community) or in the course of the work of environmental technicians or for logistical purposes. More vehicles will travel, occasionally, during shift changes (1 day every 2 weeks). It can be logically assumed that this mitigation measure reduces the dust incurred by vehicles travelling to and from the site by approximately 90%. The Proponent will continue this policy throughout the Howse Property Project Operations phase. Perceived effects of dust generated by mining projects on resource quality, the environment, and health were concerns raised by local stakeholders. Dust will affect use of Kauteitnat insofar as it is perceived as having detrimental consequences to the quality of the resources (i.e. berry harvesting). These perceived effects will likely result in avoidance of the site; Although it is acknowledged that dust settling on vegetation may deter some local land users from traditional activities (namely collecting medicinal plants and berries), a Human Health Risk Assessment (Volume 2 Supporting Study D) confirms that the risk of contamination to country foods associated with the Howse activities is also very low. As such, the effect of the Howse Project on any of the few recreational land use activities that occur in the Howse Project area will be negligible. <p><u>Substance abuse</u></p> <ul style="list-style-type: none"> As a policy, TSMC conducts compulsory drug testing on all its employees before hiring them; Since 2015, there is an agreement in place between the Royal Newfoundland Constabulary (RNC) and the Sureté du Québec (SQ) that, allows the SQ to investigate, search and arrest and detain any worker that is found to be trafficking illegal substances on site (These circumstances have occurred at least 3-4 times in the past); TSMC security officers conduct regular random searches of the dormitories. Should any drugs be discovered, the RNC and SQ will be notified. 	
Kauteitnat/Cultural Heritage	<p>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.</p>	<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. 	<ul style="list-style-type: none"> Noise effects: Heavy equipment will be equipped with properly operating noise abatement systems and all materials handling will be carried out in such a way as to avoid unnecessary generation of noise; HML will announce on the local radio stations blasting activities two days ahead of time; There will be no blasting when Indigenous groups are using Kauteitnat. Knowledge of upcoming blasting events 2 days in advance should help to plan activities around Kauteitnat; HML will continue to contribute to a fund as specified in certain IBAs for traditional activities. The Aboriginal and 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 will pursue its financial participation in Caribou Ungava 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 or in the change of migratory paths, for example. Within the framework of the program, researchers will involve the concerned Aboriginal communities in its research initiatives 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; 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; NML holds the land claim to Irony Mountains. NML plans to ask the Government of Newfoundland and Labrador what options are available for the long-term protection of the relevant part of Kauteitnat from exploration and mining activity should NML divest itself of its claims thereon. <p><u>Archaeological Sites and Burial Grounds: Through exchanges between the Proponent (via the HSE meetings) and exchanges based on traditional knowledge, there is no proven burial site. However:</u></p>	<ul style="list-style-type: none">


THEME	MMMENTS MADE DURING COMMUNITY CONSULTATIONS (NIMLJ AND NNK)	COMMENTS MADE BY LAND-USERS (NIMLJ AND NNK) AND BY TRAPLINE HOLDERS (ITUM)	PROPONENT'S CONSIDERATION OF THE COMMENTS	REMAINING CONCERNS
		<ul style="list-style-type: none"> ▪ Kauteitnat represents a lot of history, particularly geological history. 	<ul style="list-style-type: none"> ▪ The Proponent has in place an agreement with states that: Indigenous groups shall cooperate in identifying Archaeological Resources that may be impacted by the Project, and agree that all such Archaeological Resources shall not be disturbed or removed until TSMC and such groups agree on measures for protecting such Archaeological Resources; ▪ Such measures shall take into account the nature and importance of the Archaeological Resources in question. TSMC will be responsible for the costs associated with this measure; 	
Noise	<p>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.</p>	<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. 	<ul style="list-style-type: none"> ▪ Noise effects: Heavy equipment will be equipped with properly operating noise abatement systems and all materials handling will be carried out in such a way as to avoid unnecessary generation of noise; ▪ Blasting at the Howse Property will occur approximately once per week during summer and infrequently during winter (the Proponent will blast infrequently in winter, and only if frozen ground or hard rock are encountered during winter overburden removal). <p>The Proponent will employ the following mitigation measures for blasting. Efficient blasting procedures lead to a reduction of explosives use and consequently of noise and vibration due to these blasting events.</p> <ul style="list-style-type: none"> ▪ All explosives must be used in accordance with applicable laws, orders and regulations; ▪ Only properly qualified and trained personnel may handle and detonate explosives as per the manufacturer's instructions and applicable laws and regulations; ▪ The manufacturer's instructions must be followed to ensure that blasting procedures are safe both for humans and the environment. ▪ Use multiple detonators in bore holes as per the manufacturer's recommendations and optimize the arrangement of blasting holes to minimize misfires; ▪ Prevent misfires by establishing time delay blasting cycles as per the explosives manufacturer's recommendations; ▪ Use reliable triggering systems that allow for precise firing of the explosives. <p>Should noise complaints occur, the proponent will prepare a mitigation plan for drilling to be implemented. Examples of methods of reducing drill noise include:</p> <ul style="list-style-type: none"> ▪ Reducing drilling speed; ▪ Reducing drilling time; ▪ Using a noise shroud around the drill; ▪ Use of a mobile noise screen; ▪ A blast monitoring specialist will monitor a minimum of an initial four blasts to obtain site-specific data. It is recommended that the four initial test blasts be conducted with a charge of less than 700 kg per delay; ▪ Blast designs shall be continually reviewed with respect to ground vibration and overpressure. Blast designs shall be modified as required to ensure compliance with applicable guidelines and regulations. Decking, reduced hole diameters, and sequential blasting techniques will be used to ensure minimal explosives per initiated delay period; ▪ Maintain blast records. Records will include information such as: Location, date and time of the blast; Dimensional sketch including photographs, if necessary, of the location of the blasting operation, and the nearest point of reception; Type of material being blasted; Prevailing meteorological conditions including wind speed in m/s, wind direction, air temperature in oC; Number of drill holes; Pattern and pitch of drill holes; Size of holes; Weight of charge per delay; Number and time of delays. MOE (1985) will be consulted to determine an applicable list of records. <ul style="list-style-type: none"> ▪ HML helicopters activity will be limited to emergency situations or environmental monitoring. Since the environmental monitoring for the Howse Project will be largely done by truck or foot, it is therefore expected that helicopter flying will constitute a maximum of 7 cumulative days per year. 	<ul style="list-style-type: none"> ▪
Road safety	<p>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. 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.</p>	<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. ▪ The need to pass through mining activities on the road is a concern. 	<ul style="list-style-type: none"> ▪ The EPP contains road maintenance measures: it provides for the access road to the workers' camp to be 12 m wide, and all other site roads to be 21 m wide to accommodate large 180-tonne trucks; ▪ All roads will have a maximum gradient of 8% to prevent freezing and slippery conditions during winter. All site roads will be maintained regularly, including grading and ditching. Regular road maintenance should limit negative effects associated with road transportation (e.g., erosion, dust). These measures will also be applied to the northern bypass road which is now in operation. <p>Several measures were put in place in order to limit the traffic for the construction phase:</p> <ul style="list-style-type: none"> ▪ The access road leading to the TSMC mine site is considered to be a multi-user road under Québec jurisdiction and the Sécurité du Québec (SQ) have the authority enforce the highway safety code; ▪ There is regular interaction between TSMC and SQ with respect to road safety; ▪ Workers living in Schefferville, MLJ or Kawawachikamach are transported to and from the camp by bus; ▪ Once the construction of the DSO facilities has been completed, a very limited number of workers will be accommodated in Schefferville (less than current number) which will considerably limit the number of pick-up trucks on the road between Schefferville and the workers' camp. Workers mobilized for the construction of the Howse Project will be accommodated at the Timmins camp; ▪ The construction of the Kerail (end of 2014) has limited the number of haul trucks on the road between Schefferville and TSMC's Dome. These trucks will be used between the Howse Project and the Dome only once the Project is in operation; ▪ To ensure land-users access and safety, a series of other measures will be put in place from the outset of the site preparation and construction phase through to the end of the decommissioning and reclamation phase: blasting announcements will be made on the radio 48 hours in advance of blast periods, and band councils will also be notified. Prior to any blasting, security vehicles will be present on the bypass road to protect the local population. These methods mirror those currently in place for DSO project; 	<ul style="list-style-type: none"> ▪

THEME	MMMENTS MADE DURING COMMUNITY CONSULTATIONS (NIMLJ AND NNK)	COMMENTS MADE BY LAND-USERS (NIMLJ AND NNK) AND BY TRAPLINE HOLDERS (ITUM)	PROPONENT'S CONSIDERATION OF THE COMMENTS	REMAINING CONCERNS
	<p>There are some new roads, and some people felt they would get lost.</p>		<ul style="list-style-type: none"> ▪ Access to the mine road network will continue to be controlled for safety reasons. The DSO Haul road should not be used by the land users since a bypass road is available. If a land user needs to use the mine road network to access a specific area not accessible with the Timmins-Kivivik bypass road, HML will provide a safety escort to the land users; ▪ Speed limit will be maintained at 70 km/hour on the main mining 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 (SQ); ▪ HML will raise awareness among workers on the importance of safe driving. Measures are taken for detractors who are caught disobeying traffic laws and witnesses of road safety violations are asked to report details of observations; ▪ Additional road safety signs will be installed in the summer of 2017. HML and the Town of Schefferville will install speed limit and safe driving road signs between Schefferville and Timmins work site to reinforce driving laws. The signs will clearly indicate the speed limits, and will remind users of the necessity to drive carefully, to turn off safety lights when in town; ▪ The Timmins-Kivivik bypass road for land-users was completed by HML in 2015, which provides access to lands to the northwest of the DSO and Howse sites. While more travel time is required, using the bypass road to access certain areas of the territory (Rosemary Lake and Pinette Lake, for example). HML is assessing a way to improve access to this part of the land; and ▪ Collaborate with 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. ▪ Information on road access and safety measures will be included in HML's radio announcements and newsletter as required 	
Rehabilitation	<p>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?</p>	<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. 	<p>Chapter 10 of the Howse Property EIS includes the proponent's rehabilitation and closure plan. The seven sections that are addressed are:</p> <ol style="list-style-type: none"> 1. Revegetation and restoration 2. Contaminated soils 3. Support infrastructure, equipment and heavy machinery 4. Open pit: The Proponent intends to apply a mixed conventional and in pit method of mineral extraction, which will facilitate the restoration process during the operations phase of the Project. The priority in closing the open pit is to prevent wildlife and the public from accessing the pit floor, ensure stability of the slopes and maintain water quality once the pit has flooded. The ramp will be blocked at the pit exit using berms to restrict public access while maintaining access to the pit. Flooding of the Howse pit will be allowed to occur naturally from groundwater inflows, snowmelt and rainfall within the pit catchment areas. The pit walls will be excavated to a stable slope angle during mining operations. Exact slope angles will be determined based on engineering specifications, historical pit slope stability in the region, and following a geotechnical pit wall stability study. Pit water quality will be monitored on a regular basis as flooding proceeds. The pit benches lying in overburden will be regraded in order to facilitate revegetation. The extent of regrading will depend on pilot tests conducted during operations, which will determine optimal vegetation compositions and slope angles for vegetation regrowth. All perimeter collection ditches will be regraded and contoured in accordance with the surrounding landscape. During the Decommissioning and Rehabilitation phase, rock barricades consisting of rocks 1-2 m in diameter will be placed 10 m from the edge of the pit. The exact distance from the edge of the pit will be confirmed once a geotechnical assessment of the slopes is completed. These rock barricades will act as a warning and a protective barrier to prevent people and vehicles from going straight over the top of the wall. Signs in English and French will be posted approximately 15 m apart around the pit perimeter. 5. Waste rock dumps and overburden stockpile: The end goal of vegetation of the waste rock dumps is to return the area to the state it was in prior to TSMC's mining activities. The vegetation cover of the waste rock dumps should reflect the vegetation in place prior to work by TSMC. The overburden stockpile will be active over the lifetime of the mine and will be used in progressive site rehabilitation, as well as in the final closure phase. Since the overburden in the Howse area is thick (between 21 m and 50 m), any overburden remaining in the stockpile at the end of the Howse pit operation will be regraded and contoured. Pending the completion of a complete revegetation study, and based on local site conditions, it is assumed that the most effective revegetation strategy will consist of revegetating small sheltered areas first. This method would concentrate the limited organic materials in areas relatively protected from wind and water scour. The accumulated organic material from these 'vegetation islands' will subsequently disperse and provide a sufficient base for the same vegetation to spread and cover additional areas naturally. The percentage of the waste rock dump that will be completely vegetated will be evaluated during progressive rehabilitation. Revegetation may not be possible in some areas due to strong winds and high elevations. In such cases, potential mitigation measures will be evaluated as part of the progressive rehabilitation efforts. It is noteworthy that the In-Pit method will allow the Proponent to limit the size of the waste rock piles considerably, which will facilitate the rehabilitation process 6. Sedimentation ponds 7. Howse Haul road <p>Through Agreements with the Communities, HML agreed on a Rehabilitation and Restoration Plans that provide for the following:</p> <ul style="list-style-type: none"> ▪ the restoration of all affected sites, including accumulation areas, to a stable, safe and healthy condition; ▪ the use of the most current technology reasonably practicable; ▪ the removal of all buildings and structures; ▪ subject to regulatory requirements, ultimate decision making power with respect to the final disposition of roads, and other access infrastructure to be granted to the Communities provided that such decision making power does not raise liability issues for HML; ▪ the clean-up, removal and proper disposal of all process materials and potentially hazardous materials; ▪ long-term monitoring and maintenance of the site; 	

THEME	MMMENTS MADE DURING COMMUNITY CONSULTATIONS (NIMLJ AND NNK)	COMMENTS MADE BY LAND-USERS (NIMLJ AND NNK) AND BY TRAPLINE HOLDERS (ITUM)	PROPONENT'S CONSIDERATION OF THE COMMENTS	REMAINING CONCERNS
			<ul style="list-style-type: none"> ▪ realistic site by site cost estimates for completing the work under the Rehabilitation and Restoration Plans; and ▪ geotechnical soil stabilization. <p>Performance bond With respect to the Howse Iron Mine Project, before production or within such time limits prescribed by the GNL, HML will provide a financial assurance in the form of a bank guarantee covering 100% of the anticipated cost in respect of carrying out the work provided for in the applicable Rehabilitation and Restoration Plan. Release certificate. Any application by HML for a release certificate from the governments following any rehabilitation and restoration work must be filed to the satisfaction of the Aboriginal Communities, acting reasonably. Surplus Equipment and Infrastructure</p> <p>Final disposition. The final disposition of all equipment and infrastructure belonging to HML at the end of the Project that HML does not intend to continue using shall be determined by HML and the Aboriginal Communities provided that HML would no longer be liable with respect to such equipment and infrastructure. The Aboriginal Communities will have the option of purchasing such equipment and infrastructure. For greater certainty, equipment and infrastructure that the Aboriginal Communities decline to acquire shall be decommissioned, removed, rehabilitated and reclaimed as per the terms of the Rehabilitation and Restoration Plans.</p>	
<p style="text-align: center;">Water Quality (Section Erreur ! Source du renvoi introuvable.)</p>	<p>Concerned by effects on water quality and on fish.</p>	<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. 	<p>Accidents and malfunctions Section 6.4 of the Howse Project EIS describes the Proponent's readiness to manage accidents and malfunctions, and their associated effects on Project activities. Events considered include those caused by human error, exceptional natural events as well as the environmental effects on the project, that could cause adverse environmental effects on VCs. The specific errors and/or events presented were identified by CEAA and communicated via the Howse Project Guidelines, and also by a roundtable of experts with knowledge of the Project and the environmental setting within which the Howse Project sits. Where possible, details of the effects are provided (e.g. estimate of contaminant leakage and extent of damage caused by the event). Estimates of the likelihood of the event and their consequence on VCs is provided. Although the Proponent makes an effort to provide the reader with phase-specific accidents, malfunctions and environmental concerns, the Proponent recognizes that most of the events described can occur at any stage of the Project's lifespan.</p> <p>The Proponent is in the enviable position of having multiple years of experience with mining Projects in the Schefferville area and, as such, has the benefit of experience with respect to accidents and malfunctions, especially those related to the harsh local environment of the Schefferville area. Although overall details are provided below, the reader is often directed to an EPP (Volume 1 Appendix Ia of the Howse EIS) or an ERP (Volume 1 Appendix Ib of the Howse EIS), which includes details on safeguards and emergency measures that the Proponent has previously evaluated and considers effective, and is committed to follow in the event of the error/events listed below. Further, the Proponent's long-term experience with the area has allowed HML/TSMC to acquire significant amounts of information on the biophysical environment of the Howse Project area, and this knowledge will serve to inform decision-makers on how to most effectively conduct targeted responses to accidents, malfunctions, and environmental hazards (e.g. extreme weather events).</p> <p>Federal and provincial standards will be used as mitigation tools in the design stage to prevent the environment from affecting the Project. For example, the National Building Code of Canada provides design criteria for dealing with wind, snow, waves, ice loading and drainage, which are important given the extreme environmental conditions the Project may face throughout its service life. The General Guidance for Practitioners prepared by the Agency (CEAA, 2003) has also been reviewed and taken into account in the design of mitigation measures for adverse effects on the public and the environment due to climate change. The design also considers the possibility of an increase in wind strength and frequency, extreme snow and ice events, extreme precipitation and sudden snow melt, and an overall increase in precipitation.</p> <p>Water quality The ELAIOM Project effluent TSS is known to be above MMER criteria for a short period of time in spring. No other ELAIOM Project MMER effluent parameters are above the criteria. Similar effluent quality should be expected for the Howse Project as the WMP uses similar water treatment techniques. As the dilution factor is very high when the effluent reach the Howells River (>1 in 50), the effect of the Howse Project on water quality is limited to the LSA. When comparing with Elross creek that has been a receiving environment for more than 40 years due to past IOCC and present ELAIOM Projects, the effect of the Howse Project effluent is not likely to cause the demise of the actual aquatic life in Goodream or Burnetta Creeks. For all these reasons, the effect of the Howse Project on water quality is considered non-significant.</p> <p>Fish A re-examination of MMER data over 10 years of metal mining activities across Canada shows that observed effect on aquatic fauna, if any, are often below the critical effect size (Resource Consultants and Endeavour Scientific, 2015), a threshold below which an effect may be indicative of a lower risk to the environment (Environment Canada, 2012c).</p> <p>Spills Section 6.5 of the Howse Property EIS assesses the risk of accidents and malfunctions at the Howse site, including the effects of spills. The likelihood of a worse-case scenario spill is <i>unlikely and further, the likelihood of such an effect on any VC (water quality or wetlands) is negligible.</i> The proponent has the following safeguards in place:</p>	

THEME	MMMENTS MADE DURING COMMUNITY CONSULTATIONS (NIMLJ AND NNK)	COMMENTS MADE BY LAND-USERS (NIMLJ AND NNK) AND BY TRAPLINE HOLDERS (ITUM)	PROPONENT'S CONSIDERATION OF THE COMMENTS	REMAINING CONCERNS
			<p>All vehicles are equipped with spill kits for emergency response and a current Emergency Response Spill Contingency Plan, which identifies spill kit locations and response plans, will be respected. The spill kits will contain the appropriate type, size and quantity of equipment for the volume/type of product present in the storage location as well as the environment likely to be affected by a spill.</p> <p>Heavy equipment will be refueled via a mobile fueling station (i.e. a fuel truck) at various locations throughout the mine site. All fuel trucks will be equipped with auto shut off valves and will be required to carry an appropriately sized spill kit. In addition, fuel trucks will follow the rules set out in the Federal 'Gasoline and Gasoline Dispensing Flow Rate Regulations' if applicable. A spill plan will be used when refueling to prevent a discharge in the event of a splashback or overfilled tank.</p> <p>HML has the following safeguards in place to avoid spilling incidents:</p> <ul style="list-style-type: none"> ▪ spill kits will be located in close proximity to areas of risk, including storage sites of hazardous materials, parking areas, and refueling locations; ▪ the Emergency Response Spill Contingency Plan will be given to Contractors before work begins. Contractors must make the manual available to employees and ensure they are aware of the emergency measures, their responsibility, and the importance of responding quickly when a spill occurs; ▪ contractors must have a sufficient number of Spill Response Kits with contents approved by the Environment Representative; ▪ machinery must be checked on a daily basis for leakage of lubricants or fuel, and must be in good working order with special attention given to machinery working near watercourses. ▪ workers awareness program, 2 drills per year; ▪ quarterly groundwater monitoring is required as a condition of the provincial Certificate of Approval; and ▪ safe driving practices. <p>The design of the project without any watercourse crossings is the single most important safeguard against fuel spill reaching water bodies.</p> <p>In addition, the Proponent's ERP includes a section on Spill Response Procedures (Volume 1 Appendix Ib of the Howse EIS). All site personnel are trained on the procedures to report a spill and initiate a spill response. In the event of a spill, the first person to notice it takes the following steps:</p> <ul style="list-style-type: none"> ▪ contractors must contact The Environment Representative immediately in the event of an environmental incident and apply the procedures set forth in the Emergency Response Spill Contingency Plan without delay; ▪ immediately warn other personnel working near the spill area; ▪ evacuate the area if the health and safety of personnel is threatened; ▪ in the absence of danger, and before the spill response team arrives at the scene, take any safe and reasonable measure to stop, contain, and identify the nature of the spill; and ▪ remove any source of ignition in the immediate vicinity. ▪ Fuel truck drivers will also be trained to initiate the ERP using the spill kit in the truck, in the event of a spill from a fuel truck. Large volumes of fuel should be diverted away from any waterbodies by trenching or building small dykes with the tools on hand (i.e., shovel, pick, nearby loader). If the spill kit is so equipped, placing booms on the ground or across small waterways may prevent further contamination until the Emergency Response Team can arrive. Emergency personnel may be required to boom the exit point of the river if containment is not possible at the spill site. If possible, the driver should maintain communication with the dispatcher and Emergency Response Team to update the situation. 	
CUMULATIVE EFFECTS				
Air quality	<p>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.</p>	<ul style="list-style-type: none"> ▪ 	<ul style="list-style-type: none"> ▪ Following a Human Health Risk Assessment, an independent contractor has concluded that (Section 8.8.4.1 Howse EIS): <p>The likelihood for cumulative effects to human health based on current knowledge of the Howse project and external ancillary activities is considered very low, because the multimedia exposure assessment has employed numerous conservative assumptions, with consideration to traditional foods, Aboriginal traditional activities, and a comprehensive evaluation of the interaction of mine activities, air emissions and meteorological conditions that will influence air quality. Notwithstanding the conservative assumptions, the magnitude of health risk was found to be negligible for all exposure pathways, both individually and additively.</p> <p>Dust</p> <ul style="list-style-type: none"> ▪ A wash bay is available on site. In addition, before leaving the site, all vehicles are monitored by security and there is a policy in place that prevents vehicles that are not clean from leaving the site to go to Schefferville; ▪ Further, in 2016, the Proponent implemented a policy which restricts 90% of its vehicles from travelling to Schefferville. Of those 10% with special authorization to travel to Schefferville, they do so to go to the airport (which does not pass through the aboriginal community) or in the course of the work of environmental technicians or for logistical purposes. More vehicles will travel, occasionally, during shift changes (1 day every 2 weeks). It can be logically assumed that this mitigation measure reduces the dust incurred by vehicles travelling to and from the site by approximately 90%. The Proponent will continue this policy throughout the Howse Property Project Operations phase. 	<ul style="list-style-type: none"> ▪ Every mine creates dust, which creates contamination.

THEME	MMMENTS MADE DURING COMMUNITY CONSULTATIONS (NIMLJ AND NNK)	COMMENTS MADE BY LAND-USERS (NIMLJ AND NNK) AND BY TRAPLINE HOLDERS (ITUM)	PROPONENT'S CONSIDERATION OF THE COMMENTS	REMAINING CONCERNS
	<p>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.</p>		<ul style="list-style-type: none"> Perceived effects of dust generated by mining projects on resource quality, the environment, and health were concerns raised by local stakeholders. Dust will affect use of Kauteitnat insofar as it is perceived as having detrimental consequences to the quality of the resources (i.e. berry harvesting). These perceived effects will likely result in avoidance of the site. <p>Although the Proponent acknowledges that dust settling on vegetation may deter some local land users from traditional activities (namely collecting medicinal plants and berries), a Human Health Risk Assessment (Volume 2 Supporting Study D) confirms that the risk of contamination to country foods associated with the Howse activities is also very low. As such, the effect of the Howse Project on any of the few recreational land use activities that occur in the Howse Project area will be negligible.</p>	
<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Caribou and wildlife resources</p>	<p>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.</p>	<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>Caribou</p> <ul style="list-style-type: none"> HML concurs that caribou will avoid areas where there is active mining for a distance of 15 km and that the animals may return once activities cease. According to the director of Caribou Ungava (Côté 2014, personal communication), no radio-collared individual of the GRCH are present in the LSA. 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. Under an agreement with the Ungava project and CARMA, TSMC's Environmental Specialist / Permit Manager will be notified when migratory tundra caribou, which are monitored via satellite collars, come within 100 km of the Howse Project. Upon receipt of such a notice, operations will continue with caution. If data from the radio collars indicate that some of the caribou have moved to within 20 km of the Howse Project, TSMC will institute surveys within that radius to monitor their movements in greater detail. <p><u>Update on the GRCH</u></p> <ul style="list-style-type: none"> There is a serious decrease in the size of the population that began in the late 90's and accelerated around 2001: The last population size estimate provide in the EIS is 14, 200 animals in 2014. Since then, the wildlife division has indicated to the Proponent that the herd has declined further by 30%, to 10, 200 animals in 2015; GNL's Environment and Conservation issued a statement in August 2016 that the size of the herd has further decreased to 8, 938 animals based on a July 2016 survey. This statement also states that: "This long-term decline has been attributed to deterioration in habitat conditions, food resources, predation and climate change"; There is a hunting ban on caribou from the GRCH herd that will be maintained for the foreseeable future; The current areas used by the GRCH are located far from the traditional hunting grounds (see map to CEAA 82); Caribou, which have been absent from the area for several years, and so are not harvested, are not likely to return to the area naturally (e.g. their population is not expected to stabilize in the near future) nor will they return as a result of the habitat disruption from the Project. (Answer to CEAA 55); Furthermore, GNL's Environment and Conservation statement says that: "At the current rate of decline and without immediate cessation of illegal hunting, biologists predict this herd could become functionally extirpated in less than five years, meaning that the herd will become so small it will essentially lose its capacity to recover." <p>Dust</p> <p>The proponent recognizes that the effect of dust on country foods is unappealing. However, following the results of a human health risk assessment conducted by a third party, the conclusion is that the likelihood for cumulative effects to human health based on current knowledge of the Howse project and external ancillary activities is considered very low, because the multimedia exposure assessment has employed numerous conservative assumptions, with consideration to traditional foods, Aboriginal traditional activities, and a comprehensive evaluation of the interaction of mine activities, air emissions and meteorological conditions that will influence air quality. Notwithstanding the conservative assumptions, the magnitude of health risk was found to be negligible for all exposure pathways, both individually and additively.</p> <p>Helicopters</p> <p>HML helicopters activity will be limited to emergency situations or environmental monitoring. Since the environmental monitoring for the Howse Project will be largely done by truck or foot, it is therefore expected that helicopter flying will constitute a maximum of 7 cumulative days per year</p> <p>Avifauna</p> <p>The Howse Property EIS's RSA for avifauna has conservatively been designated as the area within a 30-km radius of the Howse Project. Notably, this area will include every any species that spend a part of their life cycle regionally and on which the Howse project could be effected. The 30-km radius is arbitrary but deemed sufficient to encompass all potential past, present and foreseeable future effects of the Howse Project on avifauna. Bird populations will continue to interact with the landscapes for the duration of the Project and beyond for some species, and so we set the avifauna temporal boundaries at the operations phase and decommissioning and abandonment phases. Bird avoidance due to disturbances will be mostly restricted to the operation phase while breeding birds will avoid nesting in unsuitable (altered) habitats and will not recolonize until previous habitats are restored. It is noted that given the sensitive nature of the breeding season, the period between June and mid-August is of particular importance.</p>	<ul style="list-style-type: none">
<p style="writing-mode: vertical-rl; transform: rotate(180deg);">mun ica tion</p>	<p>There is little information in the community about</p>		<p>The physical works associated with the development of the Howse Property include:</p> <ul style="list-style-type: none"> open pit; 	

THEME	COMMENTS MADE DURING COMMUNITY CONSULTATIONS (NIMLJ AND NNK)	COMMENTS MADE BY LAND-USERS (NIMLJ AND NNK) AND BY TRAPLINE HOLDERS (ITUM)	PROPONENT'S CONSIDERATION OF THE COMMENTS	REMAINING CONCERNS
	<p>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.</p>		<ul style="list-style-type: none"> ▪ stockpiles (topsoil and overburden) and waste rock dumps; ▪ Howse haul road; ▪ bypass road; ▪ water management facilities and general site drainage works; ▪ diesel, light fuel oil and gasoline; and ▪ existing facilities. <p>Chapter 3 of the Howse Property EIS provides a comprehensive description of each component.</p> <p>The Proponent is committed to:</p> <ul style="list-style-type: none"> ▪ Continue to employ women at a rate of over 10% of its Project Workforce and continue to favour women who have the required skills and qualifications; ▪ Continue to employ Aboriginal women in non-traditional roles including heavy equipment operators, plant operators, security officers; ▪ The HSE Committee, which has been put in place by HML to collaboratively oversee and assess the effectiveness and relevance of the environmental mitigation measures for the DSO Project, will also cover the Howse Project. This Committee's purpose is to provide information to the NIMLJ and the NNK on a regular basis of the economic benefits, mitigation measures, and health and safety issues. ▪ In addition, a Regional Steering Committee on Mining issues was established as of May 2015 to oversee issues relation to mining activities in Schefferville area. This Committee meets three to four times a year and is composed of local stakeholders (Ville de Schefferville, Schefferville Airport, NIMLJ, NNK and local land-users from both communities), and of mining companies working in the area. 	
<p>Economic Benefits and Employment</p>	<p>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.</p>		<p>Centre Innu de formation professionnelle :</p> <ul style="list-style-type: none"> ▪ TSMC will make a financial contribution to fund the Centre Innu de Formation Professionnelle to be established in Sept-Îles, which will benefit ITUM, but also NIMLJ and NNK community members by allowing those members to participate in the various training programs. In particular, TSMC shall make an annual payment to ITUM to fund such educational and recreational initiatives; ▪ TSMC will also continue to support educational and recreational initiatives in the community. <p><u>Excerpt from TSMC power point presentation:</u></p> <div style="border: 1px solid black; padding: 10px; text-align: center;"> <p>INTEGRATING AN ETHICAL BRAND IN THE COMMUNITY</p>  <div style="display: flex; justify-content: space-around; align-items: center;">  <div style="border: 1px solid black; padding: 5px; background-color: #e0e0e0;"> <p>TSMC's CSR initiatives:</p> <ul style="list-style-type: none"> ✓ Renovation and modernization of the MLJ arena. ✓ Tree-planting with primary school students. ✓ Site tours for students and Elders. ✓ Cultural and spiritual gatherings. ✓ Contribution to local palliative care Centre L'Elyme des Sables. ✓ Various community celebrations, sporting events, and social causes. ✓ Interactive student workshops to expose youths to mining sector-related careers. </div> </div> <p>TATA STEEL MINERALS CANADA LIMITED</p> <p>17</p> </div>	
<p>Environmental effects</p>	<p>All mining activities should be considered as a whole. Many companies are</p>	<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. 	<ul style="list-style-type: none"> ▪ The evaluation of the potential cumulative adverse environmental effects of the Howse project in addition to projects as far as more than 200 km away was completed and is presented in Chapter 8 of the Howse Property EIS. <p>A summary of the findings is presented below: Air quality</p>	<ul style="list-style-type: none"> ▪

THEME	MMMENTS MADE DURING COMMUNITY CONSULTATIONS (NIMLJ AND NNK)	COMMENTS MADE BY LAND-USERS (NIMLJ AND NNK) AND BY TRAPLINE HOLDERS (ITUM)	PROPONENT'S CONSIDERATION OF THE COMMENTS	REMAINING CONCERNS
	<p>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</p>	<ul style="list-style-type: none"> 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. 	<ul style="list-style-type: none"> The significance of the cumulative effects of the Howse Project and surrounding projects on air quality remain high under a scenario with regular blasting. The cause for air quality exceedances is attributed to pit within the DSO3 activities and located close to the Québec border. The proponent is committed to a strict monitoring protocol, which includes limiting blasting events in winter (if necessary) and a network of air monitoring equipment. Water and Aquatic Fauna <ul style="list-style-type: none"> The activities of the Howse Project do not intersect with those of surrounding projects. As such, no cumulative effects are expected for water and aquatic fauna. Wetlands <ul style="list-style-type: none"> The significance of the effects of the Howse Project and surrounding projects on wetlands is expected to be negligible. Caribou <ul style="list-style-type: none"> Largely due to the absence of evidence of caribou occupation of the Howse Project area, the significance of the cumulative effects of the Howse Project is expected to be low. Noise and light are expected to continue to cause caribou avoidance of the area. Never the less, the Proponent is committed to practice adaptive management with the caribou resource, and to participate and cooperate with local caribou monitoring programs. The Proponent is committed to altering/stopping activities in the event that caribou is seen within the Project area (5 km buffer zone). Avifauna <ul style="list-style-type: none"> Habitat loss, noise and light are expected to affect a small number of avifauna in the Howse RSA. Overall, the significance of the cumulative effects of the Howse Project on avifauna is expected to be low, in part due to the small number of birds affected, and also due to the mitigation measure to which the Proponent is committed. Human Health <ul style="list-style-type: none"> The significance of the cumulative effects of the Howse Project to risk to human health is very low. No mitigation measures are proposed. Socioeconomic conditions of Aboriginal People <ul style="list-style-type: none"> The significance of the Howse cumulative effects on the socioeconomic conditions of aboriginal people is expected to be moderate, and largely positive. The Howse Project and surrounding projects offer numerous economic benefits, which will be optimised through measures focusing on maximization of the economic benefits. Subsistence and Traditional Activities <ul style="list-style-type: none"> The majority of locals conduct harvesting activities outside of the Howse and DSO area, the significance of the cumulative effects of Howse on these activities is expected to be moderate. These effects may intensity with time, however, if new projects are implemented. The Proponent is committed to providing an access road to facilitate access to areas for harvesting activities. 	
<p style="text-align: center;">Roads and access to Land</p>	<p>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</p>	<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 	<ul style="list-style-type: none"> At the request of local First Nations Communities, the Proponent has upgraded an existing IOCC road and therefore made available the Timmins-Kivivik bypass road since August 2015. The Timmins-Kivivik bypass road was an existing road that was in disrepair, built by IOCC, and was upgraded in consultation with First Nations. The Proponent does not assume ownership of this road, but is committed to its maintenance bi-annually in order to continue to accommodate First Nation's access to the land. With this mitigation measure, the Proponent is also on the same breath providing additional access to the Howells River and Pinette Lake via a bypass road: The North Road – Greenbush bypass road The North Road – Greenbush bypass road already exists in its entirety as it is an existing road that was built by IOCC. It connects to the Timmins-Kivivik bypass road via the Greenbush crossing to Triangle Lake, then to the Howells River and Pinette Lake, using an existing historic road between the planned Howse Pit and Irony Mountain. The Proponent does not assume ownership of this road, but is committed to its maintenance bi-annually in order to continue to facilitate First Nations access to the land. There will be no blasting when Indigenous groups are using Kauteitnat. Knowledge of upcoming blasting events 2 days in advance should help to plan activities around Kauteitnat; Indigenous groups can practice their traditional activities on Kauteitnat in a noise-free environment. HML recognizes that the North Road – Greenbush bypass that it will maintain is approximately 16 km longer than the pre-project access route. As such, HML is prepared to offer financial compensation for this additional cost, via a traditional fund/compensation fund. 	<ul style="list-style-type: none">

THEME	MMMENTS MADE DURING COMMUNITY CONSULTATIONS (NIMLJ AND NNK)	COMMENTS MADE BY LAND-USERS (NIMLJ AND NNK) AND BY TRAPLINE HOLDERS (ITUM)	PROPONENT'S CONSIDERATION OF THE COMMENTS	REMAINING CONCERNS
	losses – payments for carpenters, staff.			
Waste	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.		<p>The Proponent will apply the following best practice/mitigation measure:</p> <p>Waste reduction will minimize potential air emissions due to landfilling of organic wastes and transport to the landfill site</p> <ul style="list-style-type: none"> ▪ Emphasize, in the following order, reduction at source re-use, recycling and conversion of waste. Replace hazardous products with less harmful ones if possible. The quantity of waste can be reduced at source by using up products completely, buying in bulk and accurately estimating required amounts; ▪ Comply with applicable regulations that prohibit the burning of waste. 	
Water quality	Mining activities affect lakes, and locals wonder if it also affects groundwater. Mining activities threaten potable water sources. Oil and fuel pollute water sources.		<p>Following an assessment of the potential adverse environmental effects of the Howse Property project activities on water quality, the water quality cumulative effects assessment of the Howse Property EIS (Section 8.4) states that:</p> <p>Water quantity changes are expected to be small and limited to the Howells river watershed. Therefore, no cumulative water budget changes are expected at the Howells River watershed scale. The same reasoning applies to water quality at the Howells River watershed scale.</p> <p>At a smaller scale (Elross, Burnetta and Goodream creeks), some changes to the water budget are expected from the Howse Project, namely: a 4% reduction in area of the Pinette Lake watershed, a 9% increase in the area of the Goodream Creek watershed at the junction with HOWSEB, and a 72% increase in area of the Burnetta Creek watershed at the junction with HOWSEA. The only other projects impacting on those watersheds are past IOCC and DSO3 projects. As far as Burnetta Creek is concerned, none of those other projects had an effect on its water budget or water quality and there is therefore there is no cumulative effect to consider in that watershed.</p> <p>For the Goodream Creek watershed, the only accumulation of effects would come from Timmins 4 pit exploitation (DSO3 Project), but the impact of that activity only lasted a short while and is already completed with no detectable adverse environmental effect (only a few days of discharging essentially limited to surface mine drainage). Therefore, the predicted water budget effects will not be cumulative in Goodream Creek and will come solely from the Howse Project.</p> <p>Concerning Elross Creek, the 4% reduction of the Pinette Lake watershed was evaluated as negligible to the water budget of Elross Creek watershed and past IOCC and DSO3 projects are only redirecting surface drainage from the same watershed, therefore, no cumulative effect on water budget are expected in that watershed either.</p> <p>As for water quality, sampling following the Timmins 4 pit termination does not suggest any contamination of Goodream Creek. Indeed, water quality, according to basic chemistry (pH, conductivity, dissolved oxygen and turbidity), does not show any substantial change after the discharge as shown by data from 2013 and 2014 Real Time Water Quality annual deployment reports (NLDEC, 2013b and 2014d). Therefore, no cumulative effect on water quality is expected in that watershed either. In Elross Creek, there are no water quality effects expected from the Howse Project and no cumulative effect on water quality of Elross Creek is therefore expected either</p> <p>Oil and fuel Section 6.5 of the Howse Property EIS assesses the risk of accidents and malfunctions at the Howse site, including the effects of spills. The likelihood of a worse-case scenario spill is <i>unlikely and further, the likelihood of such an effect on any VC (water quality or wetlands) is negligible.</i> The proponent has the following safeguards in place:</p> <p>All vehicles are equipped with spill kits for emergency response and a current Emergency Response Spill Contingency Plan, which identifies spill kit locations and response plans, will be respected. The spill kits will contain the appropriate type, size and quantity of equipment for the volume/type of product present in the storage location as well as the environment likely to be affected by a spill.</p> <p>Heavy equipment will be refueled via a mobile fueling station (i.e. a fuel truck) at various locations throughout the mine site. All fuel trucks will be equipped with auto shut off valves and will be required to carry an appropriately sized spill kit. In addition, fuel trucks will follow the rules set out in the Federal 'Gasoline and Gasoline Dispensing Flow Rate Regulations' if applicable. A spill plan will be used when refueling to prevent a discharge in the event of a splashback or overfilled tank.</p>	

THEME	COMMENTS MADE DURING COMMUNITY CONSULTATIONS (NIMLJ AND NNK)	COMMENTS MADE BY LAND-USERS (NIMLJ AND NNK) AND BY TRAPLINE HOLDERS (ITUM)	PROPONENT'S CONSIDERATION OF THE COMMENTS	REMAINING CONCERNS
			<p>HML has the following safeguards in place to avoid spilling incidents:</p> <ul style="list-style-type: none"> ▪ spill kits will be located in close proximity to areas of risk, including storage sites of hazardous materials, parking areas, and refueling locations; ▪ the Emergency Response Spill Contingency Plan will be given to Contractors before work begins. Contractors must make the manual available to employees and ensure they are aware of the emergency measures, their responsibility, and the importance of responding quickly when a spill occurs; ▪ contractors must have a sufficient number of Spill Response Kits with contents approved by the Environment Representative; ▪ machinery must be checked on a daily basis for leakage of lubricants or fuel, and must be in good working order with special attention given to machinery working near watercourses. ▪ workers awareness program, 2 drills per year; ▪ quarterly groundwater monitoring is required as a condition of the provincial Certificate of Approval; and ▪ safe driving practices. <p>The design of the project without any watercourse crossings is the single most important safeguard against fuel spill reaching water bodies.</p> <p>In addition, the Proponent's ERP includes a section on Spill Response Procedures (Volume 1 Appendix Ib of the Howse EIS). All site personnel are trained on the procedures to report a spill and initiate a spill response. In the event of a spill, the first person to notice it takes the following steps:</p> <ul style="list-style-type: none"> ▪ contractors must contact The Environment Representative immediately in the event of an environmental incident and apply the procedures set forth in the Emergency Response Spill Contingency Plan without delay; ▪ immediately warn other personnel working near the spill area; ▪ evacuate the area if the health and safety of personnel is threatened; ▪ in the absence of danger, and before the spill response team arrives at the scene, take any safe and reasonable measure to stop, contain, and identify the nature of the spill; and ▪ remove any source of ignition in the immediate vicinity. <p>Fuel truck drivers will also be trained to initiate the ERP using the spill kit in the truck, in the event of a spill from a fuel truck. Large volumes of fuel should be diverted away from any waterbodies by trenching or building small dykes with the tools on hand (i.e., shovel, pick, nearby loader). If the spill kit is so equipped, placing booms on the ground or across small waterways may prevent further contamination until the Emergency Response Team can arrive. Emergency personnel may be required to boom the exit point of the river if containment is not possible at the spill site. If possible, the driver should maintain communication with the dispatcher and Emergency Response Team to update the situation.</p>	