



Stantec

Stassinu Stantec Limited Partnership
607 Torbay Road
St. John's, NL A1A 4Y6
Tel: (709) 576-1458
Fax: (709) 576-2126

November 6, 2012
File No. 121810649

Vanessa Rodrigues
Project Manager, Atlantic Region
Canadian Environmental Assessment Agency
1801 Hollis Street, Suite 200
Halifax, NS B3J 3N4

Dear Ms. Rodrigues

RE: REVIEW OF THE PROJECT DESCRIPTION FOR THE PROPOSED JOYCE LAKE DIRECT SHIPPING IRON ORE PROJECT (THE PROJECT) LABEC CENTURY IRON ORE

On October 11, 2012 Labec Century Iron Ore submitted a Project Description for the proposed Joyce Lake Direct Shipping Iron Ore Project. On October 18, 2012 Labec Century received the results of the Canadian Environmental Assessment Agency (CEA Agency) review of this Project Description. This review noted deficiencies in the areas of the following sections of the *Prescribed Information for a Description of a Designated Project Regulations*:

- **Section 3.** A description of and the results of any consultations undertaken with any jurisdictions and other parties including Aboriginal peoples and the public.
- **Section 4(b).** Information concerning any environmental study that is being or has been conducted of the region where the project is to be carried out.
- **Section 6.** The provisions in the schedule to the *Regulations Designating Physical Activities* describing the project in whole or in part.
- **Section 18.** A description of any changes to the environment that may occur, as a result of carrying out the project on federal lands, in a province other than the province in which the project is proposed to be carried out or outside of Canada

Labec Century has submitted a revised Project Description that addresses each of these deficiencies. Where appropriate, these revisions have been incorporated into the required Summary Document, which has also been revised and resubmitted.

Table 1, attached, provides a summary of the revised text in the Project Description.

We trust that these changes address the deficiencies to the satisfaction of the CEA Agency and that the revised document satisfies the requirements laid out in the *Prescribed Information for a Description of a Designated Project Regulations*.

Regards,

STASSINU STANTEC LIMITED PARTNERSHIP

Mary Murdoch, M.Sc.
Project Manager
Tel: (506) 452-7000
Fax: (506) 452-0112
mary.murdoch@stantec.com

Attachment: Table 1

c. Hubert Vallée, Ghislain Arel, Ken Lam (Century Iron Mines Corp.)

Table 1 Revisions to the Joyce Lake Direct Shipping Iron Ore Project: Project Description and Provincial Registration Document - November 5, 2012 Report Date as compared to October 11, 2012 Report Date.

Changes from original are noted as follows:

Bold text = new text; Not bold text = original text; ~~Cross-out text~~ = removed text.

Page No.	Section	Location in the Section	Revised Text in the Project Description (November 5, 2012)
10	1.4.1	Paragraph 1 (addition)	The Project may also be considered a Designated Project pursuant to Section 8 of the Regulations if the process water is sourced from groundwater wells (instead of Attikamagen Lake as planned; see Section 2.8.2.8) and is extracted at a rate that exceeds 200,000 m³/a. Water requirements are currently under study and will be described in the EIS.
11	1.4.1	Paragraph 7 (revision) Table 1-3 (replacement)	Table 1-3 below is a Table of Concordance to show where information is provided in this document, as required by the Prescribed Information for the Description of a Designated Project Regulations Guide to Preparing a Description of a Designated Project under the <i>Canadian Environmental Assessment Act</i> (2012).
27	2.4.4 (Regional Environmental Studies)	New section	2.4.4 Regional Environmental Studies The proponent is not aware of any regional environmental study that has been or is currently being undertaken for the Project area.
55	4.0	First paragraph (addition of two paragraphs)	Since 2010, Century has been meeting with Aboriginal people, government agencies, and public stakeholders to discuss various projects it is pursuing in the Schefferville area. A comprehensive Consultation and Engagement Plan is in progress for this specific Project. Century has engaged in a preliminary consultation program related to the company's general operations in western Labrador. To date, identified comments or concerns have been related to general mining activities in the region. A comprehensive Consultation and Engagement Plan specific to this Project is currently being implemented. This includes engagement with Aboriginal peoples, residents of communities potentially affected by the Project, government agencies with regulatory or permitting responsibilities related to the Project, and other interested parties. An update on the engagement and consultation process, including results obtained, will be provided in the EIS.

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Page No.	Section	Location in the Section	Revised Text in the Project Description (November 5, 2012)
55	4.1	First paragraph.	As the proponent for the subject Project , Labec Century is committed to fair and honest dealings with all Aboriginal groups, to respecting the terms of any formal consultation process outlined by the Government of Newfoundland and Labrador and the federal government, and to entering into negotiations towards mutually beneficial relationships with those groups with established aboriginal rights.
57, 58	4.2	Entire subsection	<p>The following government agencies have been engaged by Century and / or by its consultants regarding the Project, and additional meetings are being planned:</p> <ul style="list-style-type: none"> • Federal Government: <ul style="list-style-type: none"> • September 25, 2012: Canadian Environmental Assessment Agency (CEA Agency): meeting to introduce the planned Project prior to submission of the Project Description; and • July 2012: Fisheries and Oceans Canada (DFO): engagement to obtain a Scientific Licence for fish surveys in 2012. • Newfoundland and Labrador Government: <ul style="list-style-type: none"> • Department of Environment and Conservation (NL DOEC; pre-registration meeting, bulk sampling program, permitting requirements for baseline studies); • Department of Natural Resources (NL DNR; exploration program, bulk sampling program); and • May to July, 2012: Department of Environment and Conservation (NL DOEC) - Environmental Assessment Division and Department of Natural Resources (NLDNR) – Mineral Lands Division; bulk sampling program; • September 2012: Department of Tourism, Culture, and Recreation – Provincial Archaeology Office: discussions, permit application, and permit issuance for baseline archaeology program; • September 20, 2012; NL DOEC Department of Environment and Conservation (NL DOEC – Environmental Assessment Division; pre-

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Page No.	Section	Location in the Section	Revised Text in the Project Description (November 5, 2012)
			<p>registration meeting;</p> <ul style="list-style-type: none"> • , bulk sampling program, permitting requirements for baseline studies); • Department of Natural ResourcesSpring 2010, 2011, 2012: NL DNR – Mineral Lands Division - exploration program, bulk sampling program); and • June and September 2010: Intergovernmental and Aboriginal Affairs Secretariat (NL IAAS) - engagement plan with Aboriginal groups. • Québec government: <ul style="list-style-type: none"> • January 2012: Ministre de Ressources Naturelles, (MNRF) – met with Minister and staff to provide an update on general status of plans for Century projects and discussed the need for engagement of Aboriginal peoples; • April 18, 2012: MNRF- met with MNRF and other stakeholders in Sept-Îles regarding Century plans for several projects and use of the port facilities; and • February 8, 2012: department du Développement économique, de l'Innovation et de l'Exportation – met with Minister and staff to provide an update on general status of plans for Century projects. • Port in Sept Îles: <ul style="list-style-type: none"> • April 18, 2012 – met with staff of various stakeholder groups, including MNRF (see above), Port of Sept-Îles, Ville de Sept-Îles, Economic Development Board of Sept-Îles regarding Century plans for several projects and use of the port facilities.

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Page No.	Section	Location in the Section	Revised Text in the Project Description (November 5, 2012)
58	4.3	First paragraph (revised text) Second paragraph (new)	<p>Century has met with representatives of two railway companies: Québec North Shore and Labrador (QNS&L) Railway and Tshiuetin Rail Transportation. Tshiuetin Rail Transportation (starting in summer of 2011) and Québec North Shore and Labrador (QNS&L) Railway (starting in spring of 2012), and meetings are ongoing on at least a bimonthly basis. Century has also met with two business owners in Schefferville and a former administrator of Schefferville, starting in summer of 2011 and ongoing in 2012. These meetings have been to discuss Century's interests in the area, its exploration activities, its operational needs, and has included specific discussions on the Joyce Lake Project.</p> <p>The proposed Project is located in a remote area of western Labrador and, as a result, consultation to date with the general public has focused on the nearby community of Schefferville, approximately 20 km from the Project location. Going forward, Labec Century will consider consultation with the general public in Labrador City and Wabush, over 200 km to the south of the Project. As the current center of mining activities\ in Labrador, these two communities have the potential for interaction with the Project in terms of supplies and labour.</p>
76	5.3.2 (Potential for Changes to the Environment on Federal Lands, Other Provinces, and Outside of Canada)	New subsection	<p>Given that the Project lies more than 10 km away from the nearest federal lands (see Table 2.4), it is considered unlikely that changes to the environment will occur on federal lands as a result of carrying out the Project. Given the close proximity (within 1 km) of some of the Project infrastructure to the provincial border with Québec, such as the haulage road option, it is considered possible that changes to the environment (e.g., effects to air quality, acoustic environment, wildlife) could occur in Québec as a result of carrying out the Project. The potential for such changes to occur in Québec will be assessed in the EIS. Given the distance from the Project to other provinces and the international border, it is not anticipated that changes to the environment could occur in provinces other than Québec and Newfoundland and Labrador, or in other countries as a result of carrying out the Project.</p>