

GUIDELINES
for
Environmental Preview Report
for the
Howse DSO Mine

Honourable Dan Crummell
Minister
Department of Environment and Conservation

December 22, 2014

ENVIRONMENTAL PREVIEW REPORT GUIDELINES

The following guidelines are intended to assist the proponent, Howse Minerals Limited, with the preparation of the Environmental Preview Report (EPR) for the proposed Howse Property Iron Mine. The EPR is a report that, using readily available information, supplements the information already provided by the proponent upon registration of the undertaking. The purpose of the EPR is to assist the Minister of Environment and Conservation in making a determination as to whether an Environmental Impact Statement (EIS) will be required for the proposed undertaking. The EPR is expected to be as concise as possible while presenting the comprehensive information necessary to make an informed decision.

The EPR should include and update the information provided in the original registration and focus on the information gaps identified during the government, Aboriginal and public review of the registration. The Proponent will be required to contact potentially affected Aboriginal Governments/organizations to address any information gaps identified by the Aboriginal Governments/organizations review of the registration and to complete the EPR. The Naskapi Nation of Kawawachikamach identified concerns with the registration. A reply has been issued responding to the concerns that were raised by that Aboriginal organization. The Proponent will, in particular, in its EPR, address those gaps that were identified by the Naskapi Nation. The EPR should address the information gaps in sufficient detail to enable the Minister of Environment and Conservation to make an informed decision as to the potential for significant environmental effects from the undertaking.

The contents of the EPR must include the following information:

1. NAME OF UNDERTAKING:

The undertaking has been assigned the Name “Howse Property Iron Mine.”

2. PROPONENT:

Name the proponent and the corporate body, if any, and state the mailing address.

Name the chief executive officer if a corporate body, and telephone number, fax number and E-mail address (if any).

Name the principal contact person for purposes of environmental assessment and state the official title, telephone number, fax number and E-mail address (if any).

3. THE UNDERTAKING:

State the nature of the project.

State the purpose/rationale/need for the project. If the proposal is in response to an established need, this should be clearly stated. Identify needs that are immediate as well as potential future needs.

4. DESCRIPTION OF THE UNDERTAKING:

Provide complete information concerning the preferred choice of location, design, construction standards, maintenance standards, etc.

4.1 Geographical Location/Physical Components/Existing Environment:

Describe the proposed location and planned layout of the mining project and associated infrastructure such as open pits, stockpiles, waste rock storage and disposal areas, processing facilities and access roads.

The EPR must include a complete hydrogeologic study that addresses the effects of the project on groundwater. This must include discussion of the effect of the undertaking on adjacent wetlands, as well as any effect on groundwater-surface water interaction, planned mitigations and an assessment of the residual effects.

The results of the geotechnical study of potential areas of instability and permafrost must be included in the EPR.

Avifauna field surveys must be conducted and the field report and data provided to the Wildlife Division, Environment and Conservation. The EPR must commit to providing an environmental protection plan (EPP), informed in part by the field surveys that mitigates any potential negative effects on the observed or expected avifauna. Common Nighthawk will require separate targeted surveys at night. The proponent is encouraged to contact the Wildlife Division for additional information on survey methodologies and analysis.

A series of reports listed in the registration document indicate that wildlife surveys have been undertaken in the project area. A copy of these reports (2009-2012) shall be included with the EPR, along with the corresponding digital data.

Provide a list in an appendix of the wildlife species observed or expected to inhabit the Project Area.

4.2 Construction:

State the time period in which proposed construction will proceed (if staged, list each stage and its approximate duration) and proposed date of first physical construction-related activity. A timeline should be presented that identifies construction activities that will occur during the breeding bird season.

The details, materials, methods, schedule, and location of all planned construction activities must be presented.

List the permits and authorizations that are expected to be required for this project. In addition to the list included in the Registration document (Table D), it is expected that a Certificate of Approval will be required from the Industrial Compliance Section, Pollution Prevention Division.

4.3 Operation and Maintenance:

All aspects of the operation and maintenance of the proposed development should be presented in detail.

5. ALTERNATIVES

Alternative means of carrying out the project to meet the stated purpose and rationale must be provided.

The Registration document indicates that alternatives were considered for the location of the waste rock pile. The EPR must provide an analysis of the alternatives considered in selecting the location of the waste rock pile. The use of existing mining pits as a potential storage location should be included in that analysis. Provide reasons for the rejection of any alternatives.

6. POTENTIAL ENVIRONMENTAL EFFECTS and MITIGATION:

Provide detailed information regarding the potential effects of the mine construction and operation on the environment and the proposed mitigation to be used to avoid adverse environmental effects.

Climate Change

Information is required on the predicted effect of the Project on climate change (e.g. contribution to the province's greenhouse gas emissions). The EPR must include information on the expected greenhouse gas (GHG) emissions for and associated data (i.e., fuel use) to calculate GHG emissions for the Project. This should include an outline of fuel burning equipment with estimates of the

expected fuel use and type, as well as the estimated output of greenhouse gas emissions for the project activities within the province.

Additional information is also required on the predicted impact of climate change on the project (e.g. effect of climate change projections such as changes in temperature, precipitation and extreme precipitation events). The data must be sourced from more than one global climate projection model, which is a crude measure only for any specific location. Climate Change and Energy Efficiency (CCEE) suggests that provincial climate change projections, available for Wabush Lake and Churchill Falls, which are an ensemble local level projection from seven scenarios from four global models, be used. Provincial climate change projections can be found at <http://www.turnbackthetide.ca/tools-and-resources/publications.shtml>). Statements regarding the potential impact of the project on climate change, as well as any mitigation and management measures, should be amended as appropriate to incorporate local climate projections.

Air Quality

An air quality assessment must be provided that evaluates the potential impacts of the Howse project. This should include atmospheric dispersion modelling of air emissions of NO₂, TPM, PM₁₀ and PM_{2.5} resulting from project operations.

Access to Traditional/Contemporary Use of Lands

The potential effects of the project on Aboriginal Governments / organizations' *traditional/contemporary use* of the project lands, and the associated mitigations, particularly during railway construction and dynamiting, must be assessed and presented in the EPR.

George River Caribou Herd

The EPR must identify what the potential effects of the project are on the George River Caribou Herd, present measures to mitigate and to assess any residual negative effects.

7. EMPLOYMENT and TRAINING

Further details are required on the potential impacts on employment. Specifically, the EPR must include:

- Timelines for occupations for both the construction and operations phase;
 - Timelines should be monthly or at least quarterly
 - Occupations listed should be at the 4-digit NOC level
- A full listing of National Occupation Codes (NOC), at the 4-digit level (preferably NOC 2006) for all positions and the number of positions;
 - Indicate the number of positions for each NOC code that are full-time and part-time

- For each of the 4-digit NOC codes for the skilled/apprenticeable trades, an estimate of the number of journeypersons and apprentices (apprentices by level) expected to be employed on the site;
- Information on any specialized training or training agreements that may be negotiated for the project and/or any strategies/goals/objectives for hiring underrepresented groups such as women, persons with disabilities, older workers);
- Information on the anticipated source of the workforce, including an estimate of local employment (local area, Aboriginal, provincial) and any strategies for recruitment;
- A commitment to provide summary reports (halfway and at the end of the construction period, quarterly for operations) to include information on the number employed by 4-digit NOC code (NOC 2006 preferred), the number of full-time and part-time employees, the number of apprentices (by level) and journeypersons by 4-digit NOC, employee gender and source of the workforce.
- The EPR should identify any known (or as soon as reasonably possible if not yet known) constraints on employment and contracting opportunities pursuant to any agreements with the Government of Newfoundland and Labrador and affected First Nations.
- The proponent is asked to include a statement in the EPR committing to update the existing Direct Shipping Ore Project Newfoundland and Labrador Benefits Plan and Woman's Employment Plan, to include the Howse Property Project. The statement should also reflect that updated plans must be submitted to and approved by the Minister of Natural Resources prior to the start of construction. The Women's Employment Plan (updated to reflect Gender Equity and Diversity) must also be approved by the Minister Responsible for the Status of Women.

8. PROJECT- RELATED DOCUMENTS:

Provide a bibliography of all project-related documents generated by, or for, the Project (e.g., feasibility study, engineering reports, etc).

9. DECOMMISSIONING and REHABILITATION:

Describe all aspects of the decommissioning and rehabilitation plans for the project.

10. APPROVAL OF THE UNDERTAKING:

List the main permits, licences, approvals, and other forms of authorization required for the undertaking, together with the names of the authorities responsible for issuing them (e.g., federal government department, provincial government department, municipal council, etc.)

The required 10 copies of the EPR, and an electronic version for posting to the Environmental Assessment website, should be sent together with a covering letter to:

Minister
Environment and Conservation
P.O. Box 8700
St. John's NL A1B 4J6