

DEC 14 2023

COR-2023-4470

Reg. # 2272

Sylvie St-Jean
Vice President, Environment
Torngat Metals Ltd.
625 Avenue President Kennedy
Montreal, QC H3A 1K27
Email: sylvie.stjean@torngatmetals.com

Dear Sylvie St-Jean:

RE: Strange Lake Rare Earth Mining Project (the Project)

Your proposal has been reviewed by an interdepartmental environmental assessment screening committee and an opportunity to comment has been provided to the public required by Part X of the Newfoundland and Labrador **Environmental Protection Act**, SNL 2002, cE-14.2. Upon consideration of the comments received, please be advised that an Environmental Impact Statement (EIS) is required.

Additional project information is required to address, at a minimum, the following:

- effects of the Project on caribou, and particularly on the George River caribou herd and its habitat;
- an analysis as to whether potential effects of the undertaking on the George River Caribou herd can be mitigated to the extent that it is unlikely that the Project would hinder the population's recovery;
- updated field surveys to describe species that may be present in the terrestrial and aquatic environments;
- quarrying activities, and exploration or testing activities that may be used to locate or evaluate quarry materials within Labrador;
- an assessment of the potential impact of placing the lower-grade stockpile at the proposed location on the viability of potentially mining the Main Zone Rare Earth Element deposit in the future that overlaps the Quebec and Newfoundland and Labrador provincial boundary;
- verification that the current Lessee (Vale Newfoundland & Labrador Limited) has given permission to Torngat Metals Ltd. for the use of land under its Surface Lease 66 and/or Mining Lease 105 for the purpose of carrying out Project activities. Any development

(including resource extraction) that overlaps with Surface Lease 66 and/or Mining Lease 105 cannot commence without the written consent of the current Lessee, and must in that case, conform with existing Development and Rehabilitation & Closure Plans;

- the impacts of road construction and use on permafrost in the Project area;
- the results of any planned baseline assessments for the entire Project, as indicated in your environmental assessment submission, for factors that could affect human health, including but not limited to atmospheric and acoustic modelling, the Human Health and Environmental Risk Assessment, the Environmental and Social Impact Study, and any additional land use studies;
- consultation with Indigenous Governments and Organizations and the public to determine how land use may be affected by the Project and how adverse effects may be mitigated; and
- other information as directed by the Project environmental assessment committee.

An Environmental Assessment Committee will be appointed to draft comprehensive EIS guidelines for my approval that will assist you with the development of the EIS. In accordance with legislation, the EIS Guidelines are subject to Aboriginal and public consultation and are due to be issued to you within 120 days of the date of this letter.

In accordance with the **Environmental Protection Act** the Project activities may not proceed until the undertaking is released from environmental assessment. Your undertaking may be subject to environmental assessment fees as described in the Environmental Assessment Fees Policy located at [Fees for Environmental Assessment - Environment and Climate Change \(gov.nl.ca\)](#). Please review the fees policy and submit a detailed capital cost estimate for the undertaking to EAProjectComments@gov.nl.ca within two weeks of receiving this letter.

If you have any questions, please contact Joanne Sweeney, Director of the Environmental Assessment Division, at (709) 729-0673 or e-mail ioannesweenev@gov.nl.ca.

Sincerely,



HON. BERNARD DAVIS, MHA
District of Virginia Waters - Pleasantville
Minister

Cc: Lela Evans, MHA, District of Torngat Mountains