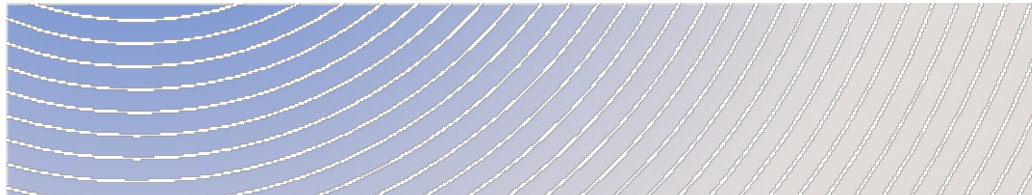


Indigenous Engagement and Partnership Plan



STRANGE LAKE RARE EARTH MINING PROJECT

November 8, 2024



Agence d'évaluation
d'impact du Canada

Impact Assessment
Agency of Canada

Canada



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1. Introduction

The Indigenous Engagement and Partnership Plan (IEPP) outlines opportunities and methods for meaningful consultation with Indigenous peoples potentially affected by the Project. The IEPP is intended to be flexible and does not preclude IAAC from making changes to the approaches described in this Plan in order to accommodate changes that may occur during the assessment process.

The federal Crown consultations will be conducted throughout the impact assessment process for the Project, in the spirit of reconciliation, renewal of nation-to-nation and crown-Inuit relationship, and in accordance with the [Principles respecting the Government of Canada's relationship with Indigenous Peoples](#).

Throughout this document, the term "Indigenous community" or "Indigenous communities" is used to refer to Indigenous Peoples who may wish to participate in the impact assessment. This term includes Indigenous Peoples, nations, communities, administrations, organizations or other, connected by Band, geographical location, community roles or other shared governance mechanisms, values or identity. Within the context of the impact assessment process, IAAC encourages the active participation of Chief and Council, community leaders or other organizations, as well as other members of the community, such as women, Elders and youth.

The purpose of the IEPP for this Project is to cover the following aspects:

- Objective of Indigenous communities with respect to the federal impact assessment of the Project;
- Federal crown consultation on the potential impacts of the Project on the Indigenous Peoples' asserted or recognized Indigenous and Treaty rights and interests;
- Engagement of Indigenous communities with respect to Indigenous Knowledge that they may wish to share when considering potential impacts, or any other cultural considerations and customs that should be taken into account when making decisions about the process or Project;
- Engaging Indigenous communities in a way that encourages the participation of different parts of the community, including women, youth and Elders;
- Tools and processes for working with Indigenous communities at all stages of the impact assessment process, including comment periods on key documents.

To complement this broader IEPP, interested Indigenous communities may develop community-specific consultation plans, to describe the community's specific objectives for consultation, or any unique features of the impact assessment and consultation process pertaining to that community.

The Project is located within the bounds of the *Labrador Inuit Land Claims Agreement*, the *Northeastern Quebec Agreement*, *James Bay and Northern Quebec Agreement* and the *Labrador Innu Land Claims Agreement-in-Principle*. As a signatory to those treaties and potentially to other treaties in the future, the Government of Canada is committed to upholding our responsibilities and working together with our treaty partners throughout the Impact Assessment process. Any unique



features of the impact assessment and consultation process pertaining to them can be captured in a nation-specific consultation plan.

In addition to the IEPP, IAAC plans to engage Indigenous Peoples and organizations that have indicated an interest in the impact assessment process, using the engagement tools and methods described in the Public Participation Plan.

2. Description of the Proposed Project

Strange Lake Rare Earth Mining Project

Tornat Metals Ltd. is proposing the construction, operation, decommissioning and abandonment of an open-pit rare earth mine, located approximately 235 kilometers northeast of Schefferville, in Quebec. The mine would have a production capacity of up to 36,000 tonnes per day and a lifespan of 30 years. As proposed, the Project would include at the mine site a 1,500 meters airstrip, a new metal mill with an ore input capacity of 17,000 tonnes per day, waste rock and tailings piles, and associated buildings. The Project would also include a road of approximately 170 kilometers between the mine site and new port facilities on the Labrador's coast.

Please note that the high-purity separation plant in Sept-Îles is not part of the Project assessed by IAAC, while marine transportation is limited to a restricted area on the Labrador coast.

For more information on the Project or to read the information and comments received, visit the Canadian Impact Assessment Registry (Registry website) at [Strange Lake Rare Earth Mining Project](#).

3. Indigenous Peoples

IAAC, as the Crown representative for the federal impact assessment process, identified a list of Indigenous communities that may be potentially impacted by the Project. This includes communities where the Project may adversely impact the established Aboriginal or Treaty rights as recognized and affirmed in section 35 of the *Constitution Act, 1982*, commonly referred to as Indigenous rights, and also Indigenous Peoples with asserted rights where an assessment of factors under section 22 of the *Impact Assessment Act* (IAA) may be required.

Although the impact assessment process is not a rights-determination process, IAAC acknowledges that the content and extent of the duty to consult and, where appropriate, accommodate, varies according to the nature of the rights (established or potential) and the severity of the Project's potential impact on these rights. IAAC's assessment of the extent of the duty to consult and, where appropriate, accommodate, is at its preliminary phase. IAAC wishes to continue this exercise in collaboration with Indigenous communities during the Impact Statement Phase and will reassess as new information is made available throughout the impact assessment process.



The Government of Canada is committed to renewing its relationship with Indigenous Peoples by implementing the *United Nations Declaration on the Rights of Indigenous People Act*. This involves the respect of rights, cooperation, partnership and carrying out impact assessments in a manner that emphasizes the need to seek free, prior, and informed consent and support self-determination. Through this IEPP, IAAC, as the federal Crown representative, supports this commitment.

3.1. Federal Crown Consultation List of Indigenous Communities and Organizations

IAAC, as the federal Crown representative, will consult with the Indigenous communities and organizations listed in Table 1 to understand their concerns and the potential impacts of the Project on those communities and organizations, in particular the potential impact on the potential or established Indigenous rights, and, where appropriate, accommodate. These consultations will comprise an integral part of the work that will support the impact assessment of the Project.

The Indigenous communities and organizations listed in Table 1 make up the federal Crown Consultation List. The Consultation list reflects Indigenous groups that IAAC understands to have a high likelihood of a potential adverse impact from the Project on their Indigenous rights. They were informed of the Project during the Planning Phase of the impact assessment process of the Project.

The lists of Indigenous communities identified may change as knowledge of the potential effects and impacts of the Project is gained, or if the Project or its components are modified during the impact assessment. IAAC reserves the right to modify the lists based on additional information gathered during the impact assessment and will notify the proponent accordingly.



Table 1: Federal Crown list of Indigenous Communities and Organizations to be consulted by IAAC and the proponent.

Makivvik
Qiniqtiq Landholding Corporation of Kangiqsualujjuaq
Naskapi Nation of Kawawachikamach
Nation Innu Matimekush Lac-John
Innu Takuaikan Uashat mak Mani-Utenam
Nunatsiavut Government
Innu Nation

4. Engagement and Consultation Objectives and Tools

Indigenous communities have identified the objectives of the impact assessment process and tools listed in Table 2 to date with regard to their participation in the impact assessment process:

Table 2: Table of Indigenous engagement approaches and activities

Common Objectives Defined by Indigenous Communities	Implementation Methods by IAAC	IAAC Engagement Tools
<ul style="list-style-type: none"> Federal Crown Consultation and Coordination of Consultation Processes 		
<ul style="list-style-type: none"> Respect the autonomy, governance structures, and realities of each Indigenous community in relation to others, and their freedom of association; Respect the United Nations Declaration on the Rights of Indigenous Peoples, in particular the principle of free, prior and informed consent; Limit duplication of assessment processes as much as possible and promote harmonization. This harmonization should aim to: <ul style="list-style-type: none"> reduce administrative stress and costs for Indigenous communities and organizations; reduce consultation fatigue and encourage community participation; and facilitate communications and exchanges concerning the Project. 	<p>The engagement activities will be:</p> <ul style="list-style-type: none"> Respectful of Indigenous governance protocols; Tailored to the specific needs and desires of each community; and Inclusive to allow for diverse participation (e.g., accessibility of meeting locations, timing of meetings, transportation, childcare, size of discussion groups, door prizes and radio communication to encourage participation). <p>Provide workshops and training during the impact assessment process, as required.</p> <p>Access to adequate financial support to sustain meaningful participation of Indigenous communities.</p> <p>If possible, IAAC will work with the other participating jurisdictions to coordinate comment periods in order to limit duplication and consultation fatigue</p>	<ul style="list-style-type: none"> Virtual meetings, face-to-face meetings, surveys, etc. When organizing face-to-face meetings, discuss location and format with communities Participant Funding Program
<ul style="list-style-type: none"> Collaboration and Communication 		
<ul style="list-style-type: none"> Establish a positive working relationship and direct communication channel with IAAC: <ul style="list-style-type: none"> Consultations that respect the consultation protocols and approaches preferred by Indigenous community representatives to consult their members; Recognition that Indigenous communities are best placed to consult their members; Creating an ethical space for exchange and collaboration, in which knowledge systems can interact with mutual respect and are equal in merit. 	<p>Continuous, open and transparent communication:</p> <ul style="list-style-type: none"> in an easy-to-understand format. as far in advance as possible; follow-up by e-mail or telephone to confirm receipt of documents and remind of deadlines; by sending email notifications for the publication of relevant documents and notices on the Registry website. <p>Sharing clear information on :</p> <ul style="list-style-type: none"> timetable and deadlines for the impact assessment process; the availability of financial assistance and the application process; the workload expected of Indigenous communities. <p>When organizing consultation activities, ensure:</p> <ul style="list-style-type: none"> oral comments from Indigenous community members are provided the same consideration as if they had been submitted in writing; cultural elements, including the seasonality of activities, cultural protocols and spirituality have been considered; use of Indigenous language and place names, wherever possible to encourage exchanges. <p>If possible, IAAC will work to have key summaries and meetings held in Indigenous communities translated into French, English and Indigenous languages.</p>	<ul style="list-style-type: none"> E-mails or calls In-person or virtual meetings, information sessions or workshops Comments submitted online on the Registry website or directly by e-mail Main community communication tools (assembly, social media, newspapers, radio, etc.) Post relevant documents and notices on the Registry website



5. Engagement and Consultation Methods

Before issuing its determination that an impact assessment was required on June 6, 2024, IAAC, as the federal Crown representative, consulted Indigenous communities on the Initial Project Description and prepared the Summary of Issues. IAAC then forwarded this summary, including the main issues identified by Indigenous peoples, to the proponent for response. Following receipt of the Detailed Project Description and the proponent's response to the summary, IAAC then sought comments from Indigenous communities on draft Tailored Impact Statement Guidelines and the Indigenous Engagement and Partnership Plan (this document). IAAC has taken the comments received into consideration in finalizing these documents.

IAAC is also collaborating with the Government of Newfoundland and Labrador on the impact assessment for this Project. The Government of Newfoundland and Labrador is conducting its own environmental assessment of this Project. More information on their process and IAAC's collaboration with the different jurisdictions involved can be found in IAAC's [cooperation plan on the Registry](#). Comments received during the planning phase were communicated with the jurisdictions with whom the Agency collaborates, in order for the jurisdiction to be able to take those comments into account in their respective environmental assessment processes.

Indigenous communities listed in Table 1 who wish to develop a community-specific consultation plan with IAAC are encouraged to express their interest to IAAC as soon as possible, if they have not already done so, in order for this plan to be prepared during the Impact Statement phase.

The table below provides a description of the main phases in the impact assessment process and methods of engagement, including opportunities for collaboration between the federal Crown and Indigenous Peoples during the impact assessment process, as currently defined under the *Impact Assessment Act*.

Table 3: Table of Indigenous engagement approaches and activities

Planned activities by IAAC	Participation/activities expected from Indigenous communities
Phase 2: Impact Statement	
<p>IAAC objectives :</p> <ul style="list-style-type: none"> ✓ Increase Indigenous communities' awareness and understanding of the impact assessment process. ✓ Provide Indigenous communities funding to support their participation for the remainder of the impact assessment process. ✓ Encourage Indigenous communities to share Indigenous Knowledge and information with the proponent to inform the development of the proponent's Impact Statement. ✓ Obtain comments and views from Indigenous communities on the proponent's Impact Statement. ✓ Notify communities of key steps in the process, such as the receipt of the Impact Statement and the comment period on the Impact Statement. ✓ Identify potential impacts on the Indigenous peoples' rights and interests, and avoidance, mitigation or accommodation measures in collaboration with Indigenous communities. <p>Timeline: Up to three (3) years (excluding any time limit extension).</p>	
<ul style="list-style-type: none"> • Sends correspondence detailing how comments made by Indigenous communities on the Tailored Impact Statement Guidelines and the Indigenous Engagement and Partnership Plan (IEPP) have been considered. • Administers participant funding for the entire impact assessment process. • Works with Indigenous communities to implement the IEPP. • Shares information and provides training to Indigenous communities on the impact assessment process. • Works with Indigenous communities to develop and implement individualized consultation plans specific to an Indigenous community, including the identification of partnership approaches where appropriate. • Maintains a dialogue with Indigenous communities regarding the assessment of potential impacts on their rights and 	<ul style="list-style-type: none"> • Apply for funding to participate in the remaining phases of the impact assessment process. • Provide input on partnership opportunities and ways they can participate in the assessment process to inform the drafting and implementation of consultation plans tailored to their communities. • If they wish to do so, work with IAAC to establish a collaborative approach to assessing the potential impact of the Project on Indigenous communities, their rights and their interests. • Express to the proponent any interest in funding for studies related to the Impact Statement. • Communicate their comments on the potential impacts of the Project on their rights and interests to the proponent to inform the Impact Statement and to IAAC to support its review of the Impact Statement. Where



Planned activities by IAAC	Participation/activities expected from Indigenous communities
<p>interests.</p> <ul style="list-style-type: none"> • Provides Indigenous communities with information on the protection of confidential/sensitive information. • Posts the proponent's Impact Statement on the Registry website and sends e-mails to Indigenous communities to inform them of it. • Works with Indigenous communities to develop partnership approaches, where appropriate, for the review of the proponent's Impact Statement. • Informs Indigenous communities of the collaborative approaches put in place between IAAC and other bodies and, where applicable, of the way in which comments and information from Indigenous communities will be shared with other bodies. • Holds a comment period on the Impact Statement. Comments will help determine whether the Impact Statement contains all the studies and information required in the guidelines. Indigenous communities will also be able to share their comments on the Project's effects, the avoidance, mitigation and compensation measures required, and the follow-up program. • Where appropriate, organizes meetings between expert authorities, Indigenous communities, and, if appropriate, the proponent to discuss technical issues, ensure common understanding of the federal guidelines, inform the assessment of impacts on Indigenous rights and interest and early identification of mitigation measures • If necessary, will request additional information from the proponent. 	<p>appropriate, these comments may include Indigenous Knowledge.</p> <ul style="list-style-type: none"> • Work with the proponent to gather relevant information about the Project's potential positive and adverse effects (direct and incidental) and discuss mitigation and monitoring measures to inform the proponent's Impact Statement. • Submit comments on the proponent's Impact Statement to IAAC to determine whether IAAC accepts the Impact Statement and moves onto the next phase of the assessment.
<p>Phase 3: Impact Assessment</p> <p>IAAC objectives:</p> <ul style="list-style-type: none"> ✓ Increase Indigenous communities' awareness and understanding of the impact assessment process. ✓ If Indigenous communities are interested, collaborate with them on the assessment of the potential impacts of the Project on Indigenous communities and on their rights and interests. ✓ Prepare IAAC's analysis and preliminary conclusions related to the Project's potential impact on Indigenous communities, hold consultations on the subject, and transmit the analysis and preliminary conclusions to Indigenous peoples. ✓ Obtain comments on the draft Impact Assessment Report and potential conditions. ✓ Notify Indigenous communities of key steps in the process, such as the comment period on the draft Impact Assessment Report and draft potential conditions. <p>Timeline: Up to 300 days (excluding any timeline extension).</p>	
<ul style="list-style-type: none"> • Administers participant funding throughout the impact assessment process. • Works with Indigenous communities to implement the IEPP and any community specific consultation plan, where applicable. • Assesses the impact on Indigenous rights and interests in collaboration with Indigenous communities that so wish. • Works with Indigenous communities to validate its preliminary analysis and conclusions regarding the Project's potential impact on Indigenous communities and their rights and interests. • Consults Indigenous communities on any proposed complementary or other accommodation measures relating to potential adverse impacts on their rights and interests. • Posts the draft Impact Assessment Report and potential conditions on the Registry website and informs Indigenous communities by e-mail. • Informs Indigenous communities of the collaborative approaches put in place between IAAC and other bodies and, where appropriate, of the way in which comments and information from Indigenous communities will be shared with other bodies. • Holds a comment period on the draft Impact Assessment Report and potential conditions. Comments will help finalize IAAC's recommendation to the Minister of the Environment and Climate Change. 	<ul style="list-style-type: none"> • As discussed with IAAC in the previous phase, and as described, if applicable, in the community-specific consultation plan, cooperate with or validate IAAC's preliminary analysis and conclusions regarding the Project's potential impact on Indigenous communities and their rights and interests. • Indigenous communities may provide written, oral or multimedia submissions to IAAC. • May invite IAAC onto the land/water relevant sites visits. • May invite IAAC to hold public consultation session in their community if they wish. Indigenous communities should work with IAAC to ensure the consultation session incorporates cultural considerations and is inclusive for community members. • Provide feedback to IAAC on the adequacy of consultation throughout the assessment process. • Comment on IAAC's draft Impact Assessment Report and draft potential conditions.



Planned activities by IAAC	Participation/activities expected from Indigenous communities
<ul style="list-style-type: none"> Sends information describing, in detail, how comments received during a comment period and at meetings have been considered. Submits the Consultation and Accommodation Report, including information about whether Indigenous communities provide their consent for the Project, to the Minister or Governor in Council to inform federal decision making. 	
<p>Phase 4 : Decision</p> <p>IAAC objectives :</p> <ul style="list-style-type: none"> ✓ Inform the proponent, Indigenous communities and the public of the Minister or Governor in Council’s decision, including the rationale for its decision, and the conditions, where applicable. <p>Timeline: Up to 30 days if the determination is made by the Minister, or up to 90 days if the Minister refers the determination to the Governor in Council (excluding any timeline extension).</p>	
<ul style="list-style-type: none"> Submits the Impact Assessment Report to the Minister of the Environment and Climate Change. The report includes the views of Indigenous communities. Posts the Decision Statement on the Registry website, including the reasons for its decision and conditions, where applicable. Maintains an ongoing dialogue with Indigenous communities, informing them of the Minister’s Decision Statement and providing them with opportunities to learn about next steps post-Impact assessment decision. 	<ul style="list-style-type: none"> May choose to make their own independent submissions directly to the Minister, to help inform the federal decision-making process. Are informed of the Minister’s decision and the phase that follow the impact assessment decision.
<p>Phase 5: Post-Decision</p> <p>IAAC objectives (if the Project is approved):</p> <ul style="list-style-type: none"> ✓ Publish post-decision follow-up and monitoring activities and the results of the follow-up program on the Registry website. ✓ Obtain comments on potential amendments to the Decision Statement, should an amendment be required. <p>Timeline: Begins after the Decision Statement is issued to the proponent and is ongoing.</p>	
<ul style="list-style-type: none"> Facilitates the transfer of the federal Crown consultation file to federal authorities, for post-decision regulatory approvals. Posts the results of monitoring and surveillance activities on the Registry website. Undertakes compliance and enforcement activities and posts the results on the Registry website. Consults on possible amendments to the Decision Statement, should an amendment be required. Where appropriate, posts a notice of decision modifying the Decision Statement, together with the reasons for the modifications. 	<ul style="list-style-type: none"> Community participation according to the timeline and activities set out in the Decision Statement. Participate in any follow up and monitoring programs included in the Decision Statement. Submit comments to IAAC on possible amendments to the Decision Statement, should an amendment be required. For questions or comments about IAAC’s compliance and enforcement program and policies, or if the public has reason to believe that there has been a contravention of the IAA, please report it to IAAC at compliance-conformite@iaac-aeic.gc.ca.



6. Participant Funding

In addition to the funding already offered during the planning phase, IAAC is offering funding to support Indigenous communities to participate throughout the impact assessment process. The opportunity to submit applications for funding will be made available to the Indigenous communities during the Impact Statement phase. This participant funding will support the Indigenous communities to comment on the proponent's Impact Statement, as well as IAAC's draft Impact Assessment Report and potential conditions.

For information about the activities that are eligible for funding or to apply for funding, see the Participant Funding Program National Program Guidelines and application at: <https://www.canada.ca/en/impact-assessment-agency/services/public-participation-impact-assessments/funding-programs.html>

7. Federal Agencies' Roles and Responsibilities

The [Permitting Plan](#), available on the [Registry website](#) at the end of the Planning phase describes the permits and authorizations that may be required for the Project to proceed.

Federal authorities identified in the Permitting Plan, as well as those with additional expert advice, will be engaged as needed with IAAC, proponent, Indigenous communities and other parties to clarify information requirements related to its specialist or expert information and knowledge. Throughout the impact assessment process, federal authorities may also review and analyze the proponent's Impact Statement, support and participate in IAAC's Crown consultation activities, and support IAAC and Indigenous communities in understanding, assessing and addressing impacts on the Indigenous rights and interests.

IAAC is the federal Crown Consultation Coordinator for the purpose of streamlining the impact assessment process. IAAC has collaborated and will continue to collaborate with all federal authorities and use their expertise throughout all stages of the impact assessment phases.

8. How to Submit Comments

Comments from your community can take many forms. IAAC is open to receiving information in a way and a format that is meaningful for your community.

Comments can be submitted at any time during the impact assessment process using the "submit a comment" feature on the Registry website ([reference number 85969](#)). Attachments can also be uploaded using this function.



If you have any difficulties with the submission process, please contact IAAC, using the contact information below. Comments may also be submitted through other means, including by e-mail to the consulting analyst assigned to the file or to strangelake@iaac-aeic.gc.ca.

Comments and other documents received by IAAC will form part of the Project file and will be posted on the Registry website, with the exception of comments or documents that are deemed confidential or subject to a non-disclosure clause. The [IAAC's Submission Policy](#) determines what information can be shared publicly and what information should remain private. For more information on how we protect your privacy, please refer to the [IAAC's Privacy Notice](#). If you do not want your comment to be posted on the Registry website, please contact IAAC at the coordinates below before submitting your comment or document.

Indigenous Knowledge shared in confidence is protected from disclosure under section 119 of the IAA, except if written consent is provided, or if the information is publicly available. In addition, Indigenous Knowledge shared in confidence could be shared with certain parties if disclosure is necessary for procedural fairness and natural justice, or for use in legal proceedings. This ensures that interested persons have a fair opportunity to participate in processes that would likely affect their interests, and that they have access to all the necessary information and evidence relied on by the decision-maker.

Should you wish to provide any comments or documents that contain confidential or sensitive information that should be protected from release to the public, please contact the Strange Lake Rare Earth Mining Project team (contact below) **before** submitting the information. This will ensure that your submission is handled appropriately. Note that IAAC will consult you prior to disclosing Indigenous Knowledge shared in confidence under an exception.

A summary of comments received during the impact assessment process will also be added to IAAC's Impact Assessment Report.

9. Contact Information

For any questions or additional information, please contact IAAC office responsible for administering the impact assessment process for this Project:

Strange Lake Rare Earth Mining Project
Impact Assessment Agency of Canada
901-1550, avenue d'Estimauville
Québec (Québec) G1J 0C1
Telephone: 418-649-6444
E-mail: StrangeLake@iaac-aeic.gc.ca