20. Environmental Management, Monitoring and Follow Up

20.1 Overview

The purpose of **Chapter 20, Environmental Management, Monitoring and Follow Up** of the Environmental Impact Statement (EIS) is to present the Project mitigation measures, management programs and plans, and monitoring and follow-up programs to support implementation of the Project in a manner that avoids or minimizes adverse effects on the biophysical and socioeconomic environments. This chapter meets the requirements of the EIS Guidelines issued on December 19, 2024, by the Newfoundland and Labrador Department of Environment and Climate Change (Government of NL 2024).

This Chapter addresses the EIS Guideline requirements by providing the following information:

- The environmental design features and mitigation measures proposed as part of the environmental effects assessment are summarized in Section 20.2 and in Appendix 20A, Summary of Environmental Design Features and Mitigation Measures.
- The approach to environmental management is laid out in the Project environmental management plans. Section 20.3 outlines the plans that accompany the EIS submission and notes the plans to be further developed post-EIS submission.

Monitoring programs and follow up programs were identified to verify effect predictions and mitigation measure effectiveness, address uncertainties, identify unanticipated effects and provide feedback for the implementation of adaptive management and are summarized in Section 20.4. These programs were identified as part of the environmental effects assessment, which is described in each technical chapter (Chapter 5 to Chapter 19). The monitoring requirements recommended in this EIS are summarized in the table presented in **Appendix 20B**, Environmental Assessment Monitoring and Follow up Programs Proposed for the Project. These proposed monitoring programs are further described in the Environmental Effects Monitoring Program (EEMP), presented in Annex 5E.

For further details, a summary of the determination of the significance of residual effects anticipated for each valued environmental component (VEC) is outlined in **Chapter 21**, Summary of Significance of Residual Effects, and the commitments made in this EIS are outlined in **Chapter 23**, Commitments Made in the Environmental Impact Statement.

20.2 Temporal Boundaries

Champion Kami Partner Inc. (Champion) will implement and maintain mitigation, monitoring, and follow-up programs throughout all phases of the Project. The temporal scope of the EIS focuses on the 40-year period from initial construction to the end of decommissioning and rehabilitation (i.e., closure) as defined by the following Project phases:

- **Construction Phase** (referred to as Construction): includes site preparation, mine, process plant and site infrastructure development, and commissioning the structures, systems, and components. The duration of Construction is expected to be four years.
- **Operations and Maintenance Phase** (referred to as Operations): includes the mining and milling of iron ore, production and shipment of iron ore concentrate, tailings management, management of mine rock, waste management, water management, release of treated effluent, site maintenance and transportation of staff and materials to and from the site. Operations are expected to initiate with one year of pre-development mining (i.e., ramp-up) and concludes when processing is complete and is expected to be 26 years.
- **Decommissioning and Rehabilitation Phase** (referred to as Closure): includes accelerated flooding of the Rose Pit, re-establishment of passive surface water drainage following the pit-flooding period, and recontouring and revegetating disturbed areas. Physical infrastructure that is not required during post-closure monitoring and for other activities required to achieve the Project's decommissioning criteria and to return the Project site to a safe and stable condition will be removed. Closure is expected to be 10 years.

20.3 Engagement and Communication

As described throughout the EIS, Champion views relationships of trust with Indigenous Peoples and local communities as key to the success and sustainability of its operations. It is through local community relationships that Champion can successfully create lasting benefits, minimize negative social and environmental impacts in the areas where it operates, and advance its contributions toward sustainable development.

Champion recognizes that Indigenous groups, public stakeholders, and regulators have an interest in understanding and participating in decisions that affect them and will continue to proactively engage in and support meaningful discussion on issues and opportunities related to the Project throughout all phases. A summary of engagement activities, as discussed in **Chapter 22**, **Section 22.6** of the EIS, that will be completed during each Project phase is provided below.

- **Construction:** implementation and continuous improvement of the Plans, including the Kami Engagement Plan (KEP); public announcement and press release at the onset of the Construction phase; posting construction signage and placing flagging in relevant areas to advise the public to exercise caution; and public information sessions and community events to continue face-to-face community engagement.
- **Operation and Maintenance**: public announcement and press release at the onset of the Operations and Maintenance phase; Project commencement press conference for public stakeholders (including domestic wood cutters), Indigenous groups, media, and local communities; and provision of facility and site tours to local government, service organizations, and other interested parties.
- **Decommissioning and Rehabilitation**: meetings and presentations on the development of a Rehabilitation and Closure Plan; and public information session to gather feedback on community expectations for the area.

The KEP also contains an issue tracking and resolution process (Annex 5G). Champion recognizes the benefit of resolving issues early to the mutual satisfaction of those involved and will continue to track issues identified by Indigenous groups and public stakeholders and make efforts to address issues through all Project phases. Public stakeholders and Indigenous groups bringing forward potential issues of concern regarding the Project will receive a response containing information to help clarify and/or assist in issue resolution. All comments from public stakeholders (including domestic wood cutters) and Indigenous Groups (written or verbal) will be documented and, where applicable, considered in the ongoing design, planning, and implementation of the Project. Input from public stakeholders (including domestic wood cutters) and Indigenous groups will be obtained at open houses, meetings, and through personal contact via verbal and written comments (e.g., comment forms). Depending on the magnitude and nature of any concerns, Champion will make every effort to address and resolve the concern directly with the stakeholders. For further information, the KEP can be found in Annex 5G.

20.4 Predictive Modelling Completed

Since acquisition of the Project in 2021, Champion has completed a thorough review of the proposed mitigation measures; monitoring requirements, commitments, and conditions outlined in the previous EIS; the CEA Agency Comprehensive Study Report (CEAA 2013); and the conditions outlined in the Lieutenant-Governor in Council's 2014 environmental assessment release (Government of NL 2014a). Several of these conditions involved updating or completing additional predictive modelling. Through the completion of this EIS, Champion has completed quantitative modelling to improve confidence in effect predictions, inform the development of environmental design features and mitigation and to inform future monitoring requirements. This has included:

- An updated hydrogeological model (TSD V) that conservatively estimated groundwater inflows to inform updated water management infrastructure (TSD II, EIS Chapter 2).
- Water Balance and Water Quality Model (TSD VI) to predict changes to water levels and concentrations of contaminants of potential concern. The model was based on the outcomes of the hydrogeology model and updated Geochemical Characterization and Source Terms. The water balance informed the water management strategy for the Project and water quality risks associated with the Project. The model results were used to inform environmental design features and mitigation, effect predictions and monitoring requirements.
- Air Quality Dispersion Modelling (Chapter 5, Appendix 5A) to conservatively model atmospheric concentrations of contaminants of potential concern to the environment and local receptors, including cabin owners. Model results were used to inform environmental design features and mitigation, effect predictions and monitoring requirements.
- Noise Modelling (Chapter 6) to model noise levels to the environment and local receptors, including cabin owners. Model results were used to inform environmental design features and mitigation, effect predictions and monitoring requirements.
- Human Health Risk Assessment Modelling (TSD XI) to predict the risk of effects to human health from environmental sources, including surface water, groundwater and air quality. The model predicted risks to human receptors, including cabin owners and local communities.

20.5 Environmental Design Features and Mitigation Measures

Environmental design features and mitigation measures are integral to the design of the Project and are aimed at preventing or reducing adverse effects on the environment and people. These measures include actions to eliminate, reduce, control, or offset the negative adverse effects, with restitution through replacement, restoration, compensation, or other means as necessary (IAAC 2024).

Through the pre-Feasibility Study (Champion 2024) and the EIS, Champion has incorporated several environmental design features into the design of the Project will improve efficiencies of the mining operations as well as reduce the environmental effects associated with the Project. The development of environmental design features and measures involved an iterative process in collaboration with subject matter experts from the Project development, environmental, and socioeconomic teams, as well as Indigenous Groups, public stakeholders, and regulators. Best management practices, management policies, and regulatory requirements were also considered in the identification of environmental design features. A list of environmental design features included into the Project are provided in Chapter 2, Project Description and summarized in Table 20-1. Examples of environmental design features that have been incorporated into the current version of the Project include:

- limiting the area of the Project footprint (i.e., centralizing infrastructure)
- designing updated water management infrastructure, which provides greater capacity for contact water management and maximizes water re-use and recycling, minimizing effects on the receiving environment
- additional features to collect and prevent fugitive dust to be emitted from the Project
- eliminating the transportation of diesel fuel by rail, and moving the railway corridor and eastern access road alignments outside of the Wahnahnish Lake Public Water Supply Area, reflecting engagement concerns raised through the previous EIS and through engagement on the current EIS
- aligning the western access road away from access roads used by Duley Lake cabin owners and recreational users, reflecting engagement concerns raised through the current EIS.

As part of the environmental effects assessment, additional environmental protection and mitigation measures have been identified to further avoid or minimize environmental effects associated with the Project. Mitigation measures include measures to eliminate, reduce, control, or offset the adverse effects of a project, and includes restitution for damage caused by those effects through replacement, restoration, compensation, or other means (IAAC 2020). Examples of mitigation measures that have been implemented for the Project include the implementation of sediment and erosion control measures (reduce) or creating new recreational trails for local snowmobile operators to compensate for the loss or restriction of access to existing trails (offset). Mitigation measures identified in the EIS also include those measures that were proposed and approved through the previous EIS and/or Environmental Management Plans to mitigate environmental effects.

A summary of mitigation measures that have been identified as a result of the environmental effects assessment are outlined in Appendix 20A. Additional details on mitigation measures to reduce effects to selected valued environmental components (VECs) are provided in Chapters 5 to 19 of the EIS. These mitigation measures will be implemented into applicable management plans for each phase of the Project (Section 20.6).

Table 20-1: Environmental Design Features Incorporated into Project Design

Component or Facility	Environmental Design Feature	Rationale
IPCC system	The previous EIS proposed Mine rock would be hauled from the Rose Pit and deposited in the Mine Rock Stockpile (referred to as the Rose South Disposal Area). Champion has since integrated the use an IPCC system into the design, where mine rock will be crushed inside Rose Pit before being conveyed to the Mine Rock Stockpile.	Incorporating the IPCC system will reduce the number of haul trucks needed to haul mine rock from Rose Pit to the Mine Rock Stockpile. This Project design improvement will result in a reduction of particulate, greenhouse gases, noise and light emissions from the Project. Through the next phases of the Project, Champion will continue to optimize the mine planning to improve mining operation and environmental management practices.
Crushed ore stockpile	The previous EIS proposed two uncovered crushed ore stockpile. Champion is now proposing one crushed ore stockpile within a geodesic dome.	The geodesic dome will reduce dust emissions compared to the uncovered crushed ore stockpiles previously proposed.
Rose Pit design	Champion has revised the design of the Rose Pit and has increased the area of the pit footprint from approximately 2.80 km^2 (280 ha) (as proposed in the Project Registration) to 2.98 km^2 (298 ha).	The updated design of the Rose Pit improves pit wall stability, reduces mine rock generated, and increases the ore quantity available for mining.
Rose Pit water management facilities and infrastructure	In the previous EIS, water would be collected within in-pit sumps and pumped from the pit into an engineered settling basin to allow for treatment of suspended solids and residual chemistry from blasting operations. The total operational case open pit mine water balance was estimated to require an average dewatering rate of 433.9 m^3/h (10,413.6 m3/day) under climate normal conditions (Alderon, 2012). Any surface water flow upstream of Rose Pit would be diverted around the perimeter of the pit in diversion channels into Pike Lake South, preventing this water from entering the pit. Champion updated the hydrogeological modelling (Appendix 7A) which increased the assumed average dewatering rate to approximately 40,000 m3/day. This increase has resulted in the need for additional and water management infrastructure, including the Rose Pit Collection Pond, Mid Lake Dam, and the Pike Lake Dike. Pit sumps and diversion ditches or channels to control surface run-off are also proposed.	The Comprehensive Study Report (CEAA 2013) recommended that the model of the existing hydrogeological environment around the proposed open pit be updated to better inform the potential effects of Project. Champion has completed this additional modelling work, taking a conservative approach to inflow estimates. This conservative modelling approach has resulted in a Rose Pit dewatering rate estimate and overall increase to the predicted volume of water that needs to be managed during the Operation Phase. This, in turn, has enabled the need to assess and design infrastructure with incremental storage capacity and effluent volume. Through the next phases of the Project, Champion will perform additional trade-off studies and evaluation to develop opportunities to manage water more efficiently.
Other water management infrastructure	Water management at the site has been modified since the Project registration.	These modifications were made to mitigate effects to local hydrology and water quality, while optimizing water re-use and treatment.
Mine rock stockpile	The mine rock stockpile was redesigned to reduce the steepness of the slopes (3:1). The flatter slopes will meet reclamation requirements for Closure. This has resulted in a slightly larger mine rock stockpile footprint with the same capacity. This change also resulted in modifications to the collection basins and overall ditching and road alignments around the stockpile.	The mine rock stockpile slope and design has been updated to support reclamation requirements for Closure.

Component or Facility	Environmental Design Feature	Rationale
Overburden and mine rock stockpile collection ponds	In the previous EIS, run- off and drainage from these stockpiles would be controlled during operations using perimeter ditching / drains and small settling ponds, as required, prior to discharge to the receiving environment. Champion is now proposing for run-off and drainage from these stockpiles be diverted to collection ponds and conveyed to a water treatment plant before discharge into the receiving environment.	The Comprehensive Study Report (CEAA 2013) recommended that Alderon design surface drainage to prevent flooding of stockpile areas. Champion has advanced this commitment by incorporating these collection ponds into the design of the Project. Run-off and drainage from the Overburden and Mine Rock Stockpiles will now be collected and processed through a water treatment plant prior to discharge into the receiving environment.
Kami railway alignment	The proposed Kami railway line will be single track, connecting the QNS&L line to the Project. The railway alignment will pass east of the Town of Wabush to the Kami site. This preliminary routing alignment was selected so that railcars can bypass the Town of Wabush and is a similar alignment to the railway that was defined and assessed in the 2012 EIS. Champion has moved the railway line north of the site and west of the Town of Wabush.	The railway alignment was moved farther north to avoid the Wahnahnish Lake Public Water Supply Area.
Eastern access road	Road access to the Project site during operations will be through a new road from Highway 500 south, passing east of the Town of Wabush to the Kami site. This preliminary routing alignment was selected so that traffic can bypass the Town of Wabush and is a similar alignment to the access road that was defined and assessed in the 2012 EIS. Champion has moved the access road alignment to the north of the site and west of the Town of Wabush.	The access road was moved farther north to avoid the Wahnahnish Lake Public Water Supply Area.
Western access road	Champion proposed the western access road in the Project Registration to be located east of Duley Lake Provincial Park with upgrades to meet the requirements for construction. The western access road has now been moved to the west side of Duley Lake Provincial Park based on input received from local residents and cabin owners through consultation and concerns related to potential nuisance effects.	The new alignment reduces interactions between the Project and local residents and cabin owners.

IPCC = In-Pit Crushing and Conveying.

20.6 Environmental Management

Environmental management plans will be used as a mechanism for the implementation of mitigation measures identified through the environmental assessment process. In 2014, Alderon submitted environmental management plans to the Department of Environment and Climate Change for approval to fulfill provincial environmental assessment release conditions. The plans were approved by the provincial Minister of Environment and Conservation in May 2014 (Government of NL 2014b). Champion has adopted the previously approved environmental management plans and has updated these plans to reflect updated Project design and optimizations, and the results of the effects assessment presented in this EIS.

The following sections provide an overview of the environmental management planned for implementation based the requirements outlined in Section 7 of the EIS Guidelines for the Project (Government of NL 2024) and other applicable regulatory requirements, and in consideration of the Project's environmental and socioeconomic mitigation measures identified through the environmental effects assessment for all Project phases. The environmental management plans describe the procedures and responsibilities that will be implemented to efficiently and effectively respond to Project aspects that could adversely affect the environment. Feedback obtained from Indigenous Groups, regulatory agencies, and the public throughout the duration of the Project may influence the nature, frequency, and locations of environmental management plans. As the Project progresses through various phases (including the permitting and licensing processes), it is expected that these plans will be refined and developed further. They will be considered "living" documents throughout the lifespan of the Project and subject to revisions as the Project progresses, where required, and in consideration of the results of follow-up and monitoring programs, and adaptive management (**Section 20.6**).

The Environmental Management Plans included in the EIS are:

- Dam Safety Plan (Annex 5B);
- Emergency Response Plan (Annex 5C);
- Annotated Table of Contents for the Environmental Protection Plan (Annex 5D):
- Environmental Effects and Monitoring Program (Annex 5E);
- Erosion and Sediment Control Plan (Annex 5F);
- Kami Engagement Plan (Annex 5G); and
- Waste Management Plan (Annex 5H).

The following environmental management plans will be prepared and completed following the submission of the EIS:

- Gender Equity, Diversity and Inclusion Plan (Annex 5A);
- Workforce and Employment Plan; and
- Transportation Impact and Traffic Management Plan

A summary on the content of each of these plans is provided in the following sections. The plans provided in the EIS will be refined as Project design progresses, where warranted, ahead of construction.

20.6.1 Gender Equity, Diversity and Inclusion Plan

Champion is committed to fostering an inclusive work environment dedicated to promoting diversity, equality, and inclusive practices within its organization. These values will be integrated into all aspects of the Project's operations, from construction through to mine closure.

Champion acknowledges a Benefits agreement which includes a Gender Equity and Diversity Plan was signed between the Government of Newfoundland and Labrador and the Kami mine Limited Partnership in 2014. Champion is determined to fulfill the commitments within the agreement to the best of its abilities.

It is a strong belief for Champion that the updated Gender Equity, Diversity and Inclusion Plan shall address access to training, employment, and procurement opportunities for women, Indigenous peoples, and other underrepresented groups. This Plan will apply to both Champion and its contractors, and it will be reinforced by corporate policies that promote diversity and inclusivity. To make sure it respects current standards and expectations, an assessment of the 2014 Gender Equity and Diversity plan is currently underway to inform the new and up to date Gender Equity, Diversity and Inclusion Plan Champion is developing. Following this assessment, the Workforce and Employment Plan will be updated and issued prior to the construction phase.

Champion remains committed to firmly establish local benefits in employment, training and business opportunities as stated in the 2014 Provincial Benefits agreement. Champion will work in collaboration with industry, various levels of government, educational and training institutions, Indigenous groups, communities and stakeholders to develop strategies aimed at creating local benefits and promoting diversity and inclusion throughout the project. We strongly believe that a collaborative and inclusive approach is

required to unlock the full potential of the Labrador Trough and to maximize the benefits of the Project. The Labrador West Alliance will play a key role in leveraging the strengths of all involved parties in achieving those objectives.

Both the Benefits Agreement and the Gender Equity, Diversity and Inclusion Plan will provide the opportunity for ongoing collaboration with industry, government, educational and training institutions, Indigenous groups, communities, and stakeholders to formulate strategies directed at local benefits creation and diversity and inclusion during the life of the Project. The Plans will outline the goals and initiatives that will be implemented throughout the Project and the measures that will be implemented to ensure, to the extent possible, that there is fair and equitable access to the benefits associated with the Project.

Champion strives to create value in a sustainable manner in all the communities where it operates. The Project is fully aligned with this objective and with our vision to develop a mining project that future generations of Labradorians will want to contribute to.

20.6.2 Dam Safety Plan

The Dam Safety Plan (Annex 5B) intends to present dam classifications based on the Canadian Dams Association (CDA), a proposed dam management plan, a preliminary map of potential zones affected by dam breaks and a preliminary assessment of potential credible failure modes of each water and tailings management infrastructure involved in the Project. The dams included in this Plan are the dams and dikes required for the Rose Pit water management and stockpiles water management and the dikes required at the tailings management facility (TMF). The Dam Safety Plan was created in accordance with the requirements outlined in the EIS Guidelines (2024) (refer to Section 1.2 of Annex 5B), which include the following:

- Dam break inundation and mapping;
- Assessment on Projects impacts on downstream environment;
- Assessment on water quality impacts from regular discharge from the TMF, or leak or failure of tailings dam; and,
- Identification of components of the dam safety program including the Emergency Preparedness and Response Plan.

In addition, the Dam Safety Plan outlines a brief overview of the proposed dam management, as part of the EIS. When the Project reaches subsequent phases, namely the design, construction, operation and closure phases, more details of the dam management plan will be established or updated. This includes completion of numerical dam break analysis defining the inundation areas, accounting people at risk and environmental loss in more detail. The proposed evolution of the development of the Dam Safety Plan for the subsequent Project phases, based on the recommendations from the CDA, are outlined in **Section 5** of **Annex 5B**. The proposed dam management plan is conceptual and will be updated before the commissioning of the Project as part of an operational manual of the site (OMS Manual).

20.6.3 Emergency Response Plan

The Emergency Response Plan (refer to **Annex 5C**) outlines the clear procedures to be followed by Project personnel, including Champion employees, contractors, sub-contractors, regulators and visitors during emergency situations while undergoing Project construction, operations and site closure activities. Champion mainly focuses on prevention rather than reactive response; however, a well-planned emergency response is essential. Effective planning can shorten the time needed to take crucial actions during an emergency, thereby reducing its overall impact to people and the environment.

The Emergency Response Plan is a dynamic document that may require updates to address unforeseen emergency scenarios or improvements identified through evaluations of emergency simulations or regulatory updates. Such revisions will be undertaken throughout the Project duration to ensure alignment with evolving circumstances, fostering open communication across all levels and facilitating continuous enhancement.

The scope of the Emergency Response Plan covers all injuries, accidents and malfunctions or other emergencies at the Kami mine site, including the Tailings Management Facility (TMF), overburden and mine rock stockpiles. It also identifies training requirements for Project personnel, and requirements for internal and external communication, plan testing evaluation and revision as well as incident reporting. The plan applies to all components of the Project; it addresses all phases of the Project from Construction, through Operations and Maintenance, and including Decommissioning and Rehabilitation.

20.6.4 Environmental Protection Plan

Champion is committed to completing the Environmental Protection Plan for Ministerial Review prior to initiation of construction. Following the Ministerial Decision on the Project, Champion will incorporate commitments and conditions of the release into the Environmental Protection Plan, upon approval of the Project. An annotated table of contents of the EPP has been included in this EIS submission (Annex 5D). Updates to the Environmental Protection Plan (EPP) will be made as required by the Minister.

The EPP is a standalone document that establishes work practices and assign roles and responsibilities that all Project participants will follow to mitigate negative environmental effects associated with construction of the Kami Project. The EPP applies to all Project participants, including Project Personnel, Contractors, Subcontractors, suppliers, service providers, and all employees of these organizations. The EPP will be submitted by Champion subsequent to the completion of the EIS, and prior to the initiation of Construction phase.

At a future stage, a separate EPP will be prepared for the Operations phase of the Project.

20.6.5 Erosion and Sediment Control Plan

The Erosion and Sediment Control Plan (ESCP) (Annex 5F) identifies requirements and actions for the management of soil erosion by wind or water and transport of suspended sediment generated by the Project with a specific focus on the construction phase. During operations, water management infrastructure will be utilized to mitigate sediment and erosion effects. This will also include all related documentation and reporting requirements for regulatory bodies and expectation of Champion. The ESCP is a dynamic document that may require updates to address unforeseen scenarios or improvements. Such revisions will be undertaken throughout the Project duration to ensure alignment with evolving circumstances, fostering open communication across all levels and facilitating continuous enhancement.

The purpose of the ESCP is to be used as a reference document to address and manage erosion and sedimentation throughout the various phases of the Project, while ensuring compliance with the Project EPP, regulatory requirements and industry best practices.

During the Project, the environmental management team at Champion will continuously offer direction and supervision to ensure that all operations adhere to environmental regulations and policies on erosion and sediment control, complemented with our overarching dedication to environmental stewardship, with meticulous planning, design, and execution.

Champion is dedicated to engaging with key stakeholders and the public on the ESCP to ensure that expectations and regulations are being met.

20.6.6 Kami Engagement Plan

The Kami Engagement Plan (KEP) serves to meet the requirements outlined in Section 7.2.4, Section 7.2.5, and Section 7.2.8 of the EIS Guidelines (2024), for the development of the Public Participation Plan, Indigenous Participation Plan, and Domestic Wood Cutting Consultation Plan, respectively. The combined Public Participation Plan, Indigenous Participation Plan, and Domestic Wood Cutting Consultation Plan form the KEP. The KEP has been developed based on Champion's engagement objectives for the Kami Project and was informed by the previous engagement work completed with public stakeholders and Indigenous Groups by Alderon during the previous EIS (Alderon 2012).

During the Project, the environmental management team at Champion will offer direction and supervision to confirm that that all construction and operations adhere to all environmental policies on Indigenous and public participation. These efforts will be complemented by the company's overarching dedication to environmental stewardship, with meticulous planning, design, and execution.

Champion is dedicated to implementing the KEP and engaging with key stakeholders and the public to help ensure that expectations and regulations are being met. For more information regarding the KEP monitoring and follow-up framework, refer to **Section 20.3**.

20.6.7 Waste Management Plan

The Waste Management Plan (WMP) (refer to Annex 5H) identifies requirements and actions for the management of waste generated by the Project. This includes methods to reduce, reuse, recycle, recover, and/or manage residual waste through off-site disposal. Champion seeks to achieve and maintain a high degree of control over the collection, storage, transportation, and disposal of waste to minimize adverse environmental effects while ensuring compliance with all applicable acts, regulations and standards. This will also include all related documentation and reporting requirements for regulatory bodies and expectation of Champion.

The overarching purpose of the WMP is to ensure the responsible and environmentally sustainable handling, storage and adequate disposal of all waste materials generated during all the phases of the Project, thereby, minimising potential environmental and health impacts.

The WMP is a dynamic document that may require updates to address unforeseen waste scenarios or improvements identified through process evaluations. Such revisions will be undertaken throughout the Project duration to ensure alignment with evolving circumstances, fostering open communication across all levels and facilitating continuous enhancement.

In addition, Champion has proposed to manage uncertainty in managing mine waste streams through adopting mine rock through adaptive management (**Section 20.7.1**). The objective of an adaptive management plan is to identify risks and uncertainties that may result in adverse impacts to the environment and develop a management plan that allows for continual improvement through review and analysis of uncertainties and risks for a project. Specifically, Champion has determined that geochemical risks posed by the Project mine waste streams will be adaptively managed such that quality of mine effluent meets regulatory guidelines and may be discharged to the environment during the Post-Closure Phase. This will be carried out via the systematic process of assessing potential effluent quality problems, design and implementation of an action plan to address the problem, monitoring effectiveness of action plans, evaluation of outcomes and adjustment of the plan. The entire process is iterative with the main objective of Champion to continuously improve management practices during the Project lifecycle.

20.7 Follow-Up and Monitoring Framework

Environmental assessment predictions about future conditions have a level of uncertainty that cannot be reduced to zero; therefore, monitoring and follow-up programs are implemented to verify predicted effects, evaluate the effectiveness of mitigation, and to measure compliance with permit conditions and statutory requirements. Monitoring addresses uncertainties associated with effects predictions, identifies unanticipated effects, and provides input into corrective actions or adaptive management to limit those effects. Collectively, these actions improve the overall environmental performance of a project.

Typically, monitoring includes one or both of the following categories that may be applied during the Project lifespan:

- **Regulatory compliance monitoring:** Activities and programs undertaken to confirm the implementation of approved design standards, mitigation, approval conditions, and Champion's commitments (e.g., inspecting construction equipment for cleanliness prior to arriving on site, inspecting noise suppression [mufflers] on vehicles to make sure they are functioning properly).
- **Follow-up monitoring:** Programs designed to test the accuracy of effects predictions, reduce or address uncertainties, determine the effectiveness of mitigation, or provide appropriate feedback to operations for modifying or adopting new mitigation designs, policies, and practices (e.g., implementation of adaptive management). Results from these programs can be used to increase the certainty of effect predictions in future environmental assessments.

Where relevant, conceptual monitoring programs would be proposed to confirm predictions and to address the uncertainties associated with the effects predictions and mitigation.

The ultimate responsibility for the operation of the Project will lie with Champion. Relevant members of the senior management team will bear the responsibility for the implementation of Project policies, management programs, and plans. For the effective management of the Project, appropriate personnel and financial resources must be in place. Champion responsibilities will include confirming that such resources are available to implement the monitoring and follow-up programs.

Monitoring requirements are proposed in each technical chapter (**Chapter 5** to **Chapter 19**). The objectives of the proposed monitoring programs are to address uncertainties associated with the effects predictions and to evaluate the performance of the Project, including the applied mitigation and enhancement measures. The monitoring programs proposed in the EIS formulate the conceptual EEMP, which is presented in **Annex 5E**. The monitoring and follow-up program is presented in **Appendix 20B**.

The EEMP (**Annex 5E**) is a living document that describes the steps taken by Champion to meet and maintain a high degree of control over the environmental mitigation measures proposed in the EIS to minimize adverse environmental effects to be implemented throughout the lifespan of the Project (as defined by the Project phases). Champion is currently planning and designing for the Rehabilitation and Closure Plan which will be submitted to the Province following the submission of the EIS, and which will include an assessment of long-term mitigation and monitoring requirements. Therefore, the current version of the EEMP focusses on mitigation and monitoring of environmental aspects during the Construction and Operations Phases and will be adapted to include future phases of the Project. Champion will update the conceptual EEMP following consultation with applicable regulatory agencies, prior to construction.

The adaptive management approach has also been proposed to address the uncertainties associated with the effects predictions and mitigation measures. The process for adaptive management is presented in **Section 20.7.1** and further details regarding the process for determining when, how, and where to use adaptive management will be outlined in the Adaptive Management Plan, which will be attached to the EPP.

The follow-up and monitoring framework supports the overall environmental management for the Project and is implemented as part of the framework to verify predicted effects, evaluate the effectiveness of mitigation, and to measure compliance with permit conditions and statutory requirements. Monitoring is used to address uncertainties associated with effects predictions, identify

any unanticipated effects, and provide input into corrective actions or adaptive management to limit those effects. Collectively, these actions improve the overall environmental performance of the Project.

The objectives of the follow-up and monitoring framework are to:

- Verify the accuracy of the effects assessment;
- Confirm the effectiveness of the measures implemented to mitigate adverse effects of the Project;
- Confirm compliance with commitments made during the EIS process; and
- Confirm compliance with regulatory conditions of approval.

The key components of the follow-up and monitoring framework include:

- Environmental monitoring plans; and
- Environmental management plans.

The follow-up and monitoring framework applies to the Construction Phase; Operations and Maintenance Phase; as well as Decommissioning and Rehabilitation Phase (described **in Section 10.1.1.1**) of the Project. In the event that monitoring results indicate that realized effects are approximability different than predicted further investigation will be undertaken and mitigation strategies may be modifies as needed to reduce or eliminate unforeseen adverse effects.

20.7.1 Adaptive Management

Adaptive management is a systematic process for improving environmental knowledge and adjusting management practices based on outcomes. It provides a structured yet flexible approach to decision-making, allowing for adjustments in monitoring and mitigation measures throughout a project's lifespan. **Figure 20-1** shows the integrated adaptive management framework that is proposed for the Kami Project.

As new information verifies environmental effects and the efficacy of mitigation measures, monitoring programs will be improved accordingly. Monitoring will be compared to anticipated effects and permit requirements. Management has also been proposed to address the uncertainties associated with the effects predictions and mitigation. If results do not meet expectations or if there is insufficient understanding of a project's impact and an inability to confidently predict outcomes, adaptive management will be employed to mitigate these effects/uncertainties and meet Project requirements. For instance, if environmental monitoring detects unexpected changes, adaptive management will determine the necessary actions to minimize adverse effects and reduce uncertainty. These actions may include more intensive or focused monitoring, specific studies focused on better understanding of a particular change in measurable parameters and associated environmental effects, improved or modified design features, or additional mitigation measures.

In accordance with the EIS Guidelines, the detailed monitoring program may be finalized after the EIS process in consideration of comments received by government agencies, Indigenous communities, and other interested parties. As such, the adaptive management plan has been proposed to address uncertainties associated with potential effects and mitigation measures, allowing for continual review and analysis of uncertainties and risks. Adaptive management considerations provide a structured approach to decision-making, while allowing flexibility to modify approaches to environmental protection throughout the Project's lifespan.

Actions stemming from adaptive management may include more intensive or focused monitoring; additional studies to increase understanding of changes and associated environmental effects, improved or modified design features; or the implementation of additional mitigation measures.

The Adaptive Management Plan, which pertains to the Operations phase of the Project and includes details on its process and application, will be prepared and completed following the submission of the EIS.

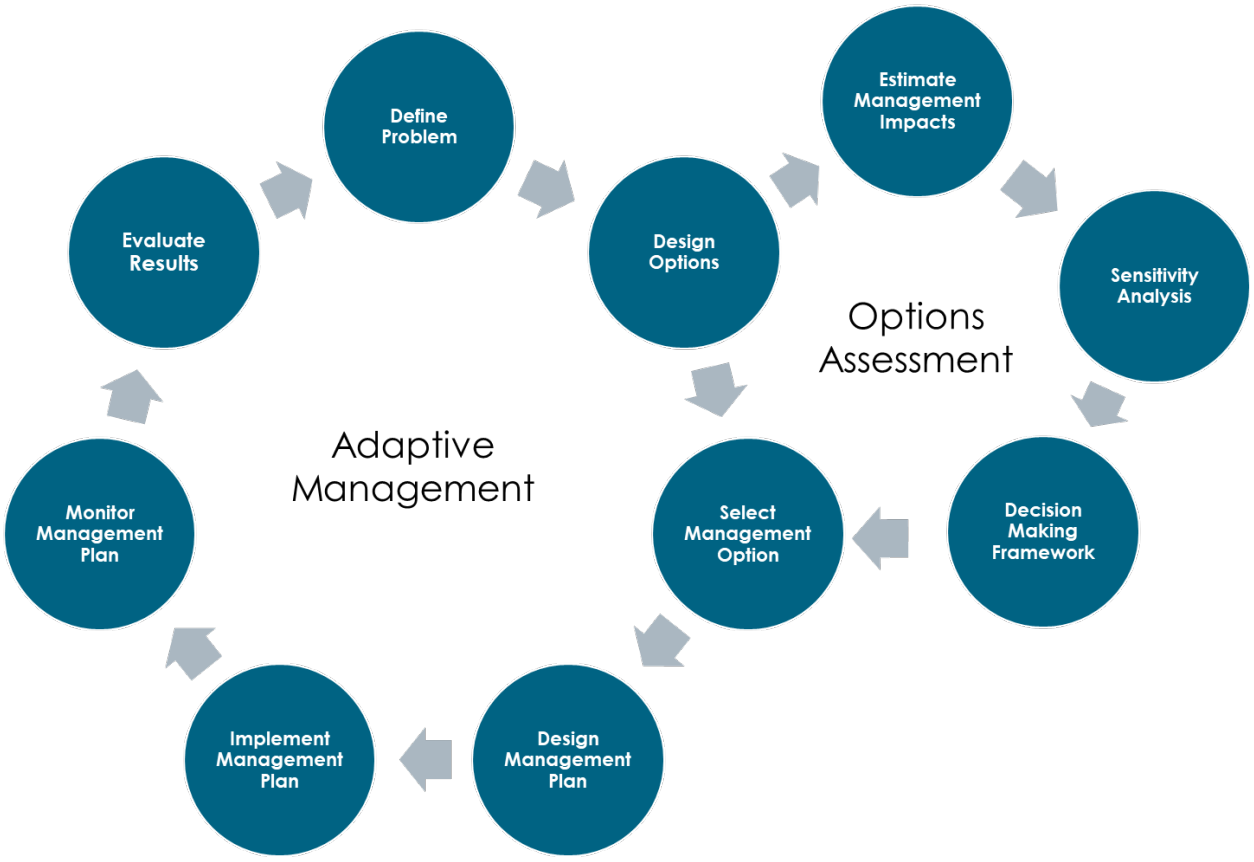

Figure 20-1 : Integrated Adaptive Management Framework

20.7.2 Information Management and Reporting

Information management and reporting would be fundamental components of the environmental management and monitoring programs. Information collected through these programs would need to be efficiently managed, checked, reported, and reviewed regularly to meet the objective of continual improvement. Processes for managing data collected as part of socioeconomic management programs would be subject to the same general principles and requirements as data collected.

Section 2.4 of Annex 5E (Environmental Effects Monitoring Plan) describes the verification, assessment and reporting requirements for the EEMP. Analytical and field results will be tracked and reviewed throughout the lifetime of the Project to allow for assessment against regulatory permits / approval requirements, mitigation effectiveness, and other requirements of the Project, where applicable. Data from the field assessment and analytical results will be monitored to determine if results from monitoring are shifting away from baseline results and potentially toward regulatory thresholds. In the event that a negative trend is apparent in the data, early detection through ongoing assessment of the data will allow for mitigation correction to improve the results of future sampling events.

Processes that define environmental data management storage, standards, and responsible roles in line with monitoring programs would be described as part of the EEMP (Annex 5E). Data collected would meet the required guidelines for collection and quality assurance and control. Champion will store information generated from the monitoring and follow-up programs in a robust database for future analysis and reporting.

Results from the monitoring and follow-up programs would be reported and submitted to regulators in line with the relevant regulatory permits and approvals. A reporting program will be developed based on the requirements for the Project.

Reports from monitoring would be publicly available through the independent environmental monitoring and compliance reporting to government, as applicable. Other stakeholders would have access to publicly available information.

Appendix 20A: Summary of Environmental Design Features and Mitigation Measures

Table 20A-1: Summary of Project Environmental Design Features and Mitigation Measures

Project Activity or Effect	Environmental Design Features, Mitigation, or Enhancement Measures	Applicable Environmental Components

Environmental Management Plans	— Develop and implement the following Project-specific management plans, with input from applicable government agencies, Indigenous groups and the public:
	  — Dam Safety Plan
	  — Emergency Response Plan
	  — Environmental Protection Plan
	  — Environmental Effects Monitoring Program
	  — Gender, Equity, Diversity and Inclusion Plan
	  — Kami Engagement Plan
	  — Sediment and Erosion Control Plan
	  — Transportation Impact Assessment and Traffic Management Plan
	  — Waste Management Plan
	  — Workforce and Employment Plan
	— A Rehabilitation and Closure Plan will be developed in collaboration with government and Indigenous communities. This will be submitted as part of the permitting process.
		— All

Air Quality and Emissions	— Install the transmission line at early stage of construction to minimize consumption of diesel fuel for power. — Evaluate the opportunities to reduce fuel combustion requirement of infrastructure and equipment, to the extent practicable, during detailed design — Use electric drills and shovels to reduce diesel exhaust emissions from the mining fleet. — Use electric shovels and production drills in Rose Pit. — Conduct a Best Available Control Technology (BACT) analysis and implement findings of the most recent version. — Use the best available pollution control technology at material transfer points. — Maintenance of pollution control equipment (dust collectors and bin vents). — Use and maintain emissions control devices on motorized equipment. — Maintain and monitor mobile mining equipment and vehicles and operate the equipment within parameters for engine exhaust system design. — Minimize haul route distances, thereby reducing fuel consumption and fugitive emissions from equipment. — Seek to reduce fuel combustion requirements of infrastructure and equipment during detailed design, to the extent feasible. — Limit idling of equipment and vehicles to the extent practicable. — Apply water and/or dust suppressants to site roads, including the access road, as necessary. — Apply water sprays to stockpiles or areas that have visible dust, as necessary. — Limit vehicle speed on unpaved roads to reduce fugitive dust. — Maintain mobile mining equipment and vehicles and operate the equipment within parameters for engine exhaust system design. — Limit idling of vehicles and equipment to the extent practicable. — Conduct regular equipment maintenance to prevent the likelihood of upset conditions.	— Air Quality and Climate — Surface Water — Fish and Fish Habitat — Vegetation, Wetlands and Protected Areas — Wildlife — Community Health and Well-Being

Project Activity or Effect	Environmental Design Features, Mitigation, or Enhancement Measures	Applicable Environmental Components
Fugitive dust emissions and deposition	— Application of water and/or suppressants should be applied to site roads and access roads as necessary. — Establishing and enforcing speed limits on site and access roads will reduce dust production. — Limit vehicle speed on unpaved site roads to reduce fugitive dust during Construction and Operations. — Minimize haul route distances, thereby reducing fuel consumption and fugitive emissions from equipment. — To limit total suspended particulate emissions, a reduced speed limit for heavy equipment involved in material movement and earthworks on site will be enforced. This speed limit does not apply to site road traffic or the haul route from the headworks to the overburden and mine rock stockpiles. — All crushed iron ore stockpiles would be covered with dust collection technology to minimize fugitive dust and silica from crushed ore stockpiles. — Use dust suppressants that minimize environmental risk and are government approved. — Apply water sprays to stockpiles or areas that have visible dust, as necessary. — Minimize areas of vegetation clearing and soil disturbance to reduce the generation of fugitive dust. — Implement progressive re-grading and reclamation of the overburden stockpile (starting during Operations, where applicable), and the mine rock stockpile (Starting during Operations, where applicable) and TMF (starting during Closure)	— Air Quality and Climate — Surface Water — Fish and Fish Habitat — Vegetation, Wetlands and Protected Areas — Wildlife — Community Health and Well-Being
Noise emissions	— Comply with *Labrador City Noise Abatement Regulations, Wabush Noise & Nuisance Regulations*, Health Canada Noise Guidelines and Quebec Noise Guidelines. — Maintain road surfaces such that rough surface, ruts or pothole conditions are avoided or repaired. — Maintain equipment to minimize noise emissions. — Design access roads to minimize reversing, which is expected to minimize use of backup beepers, where possible. — Notify Indigenous communities, landowners, and relevant stakeholders through the Kami Working Group of the planned construction schedule before the start of construction and prior to specific noisy activities. — Minimize equipment idling. — Operate vehicles and equipment such that impulsive noise is minimized, where possible. — Investigate noise concerns as they arise through a complaint resolution mechanism whereby persons can contact Champion if there are perceived noise issues. — Select travel routes that avoid noise impacts on sensitive sites or habitat to the extent possible. — Conduct noise monitoring and measurements during operations.	— Vibrations and Light — Wildlife — Community Health and Well-Being

Vibration and blasting	— Investigate vibration concerns as they arise through a complaint resolution mechanism whereby persons can contact the Project team if there are perceived vibration issues.
	— Comply with *Labrador City Noise Abatement Regulations, Wabush Noise & Nuisance Regulation*s, Health Canada Noise Guidelines and Quebec Noise Guidelines.
	— Maintain road surfaces such that rough surface, ruts or pothole conditions are avoided or repaired.
	— Avoid operating equipment that is expected to generate significant vibrations at the same time. Operating them separately may reduce overall vibration levels.
	— Construction blasting will be carried out in compliance with the Quebec's Transport Ministry Guideline for construction blasting and the DFO's guideline for the use of explosives in or near fisheries waters.
	— All blasts which might effect local structures, disrupt humans or effect local fisheries will be monitored for ground and air vibrations.
	— Blasting detonator timing and blast mats will be used, as appropriate, to control vibration as required.
	— During operations, monitor vibrations, air overpressure and water overpressure at the nearest receptor where impact may occur for that source (i.e. when predicted levels are expected to be more than 20% of the limit for that receptor).
	— The adaptive management plan will include a section related to vibration in which a limit of 80% will be outlined and were different mitigation measures will be considered such as:
	  – Reducing borehole diameter
	  – Introducing additional decked charges within each borehole
	  – Reduce borehole length (depth) by reducing the bench height
	  – Using electronic detonators
	  — These mitigations will be reviewed prior to the operation phase with the support of the blasting contractor.
	— Blasting operations will follow DFO's Measures to Avoid Causing Harm to Fish and Fish Habitat (DFO 2018) and Guidelines for the Use of Explosives in or Near Canadian Fisheries Waters (Wright and Hopky 1998) for setback distances from fish-bearing water bodies.
		— Noise and Light
		— Wildlife
		— Community Health and Well-Being

Project Activity or Effect	Environmental Design Features, Mitigation, or Enhancement Measures	Applicable Environmental Components
Explosives Handling	— Transport and store explosives in accordance with federal and provincial legislation, where applicable — Do not use ammonium nitrate and fuel oil — Use explosives in emulsion or emulsion blend to mitigate potential dissolution and poor explosive performance in the presence of water — Carry out blasting activities in accordance applicable permits and approvals — Safely dispose detonated discarded explosives or return to the explosives' distributor — Safely transport raw materials for the manufacture of explosives, if prepared on site — Explosives and/or accessories stored on site will be at a safe distance from the Project infrastructure — Establish drill and blast specifications and use controlled blasting techniques, where required	— Vibration — Surface Water — Accidents and Malfunctions
Light emissions	— Investigate light concerns as they arise through a complaint resolution mechanism whereby persons can contact the Project team if there are perceived light issues. — Design and install lighting systems for worker safety, security, and navigation to meet industry-recommended minimum lighting levels, while minimizing light spill offsite and non-essential lighting. — Leave tree cover in place, where feasible, to reduce the visibility of mobile equipment lighting at PORs.	— Noise, Vibrations, and Light
Dewatering and water supply activities	— Beneficial re-use of treated water (i.e., to remove suspended solids) should be completed where possible to mitigate the anticipated temporary local recharge deficits. — Dewatering infrastructure (i.e., sump pumps or wells) will be installed in accordance with applicable regulations. — Water withdraw will be completed in accordance with provincial and federal standards and licence/permit conditions and industry best standards — Wells will be equipped suitably (i.e., with variable-frequency drive pumps) to allow effective control of dewatering rates within permitted rates. — Implement water transfers from Duley Lake to Pike Lake as a key water management tool. — Instrumentation of dewatering wells and monitoring wells will be completed to allow for threshold values for groundwater level to be established, potentially leading to creation of a Trigger-Action-Response Plan (TARP) to be adhered to during operations. — Monitor flows before and after construction to quantify the changes in flow and their effects on the aquatic environment and apply adaptive management as necessary. — Intake pumps will be screened to prevent entrainment or impingement of fish. — Pump intake screens will be in accordance with DFO's Freshwater Intake End-of-Pipe Fish Screen Guideline (DFO 2015). — Intake screens will be located in areas and depths of water away from high-quality fish habitat. — Screens will be oriented to face in the same direction as the water flow. — Screens will be located above the water body's bottom to prevent the entrainment of sediment and aquatic organisms associated with the bottom area. — Adhere to guidance from regulators such as DFO regarding the allowable rate and timing of withdrawals from the point of supply.	— Groundwater — Surface water — Fish and fish habitat — Vegetation, Wetlands, and Protected Areas — Wildlife and Wildlife Habitat
Treated effluent and treated sewage discharge	— Design, construct and operate water management infrastructure in accordance with applicable permits, approvals, and best industry practices to minimize impact to surface water in receiving waterbodies — Recycle and re-use process water to reduce freshwater intake and release to environment including Duley Lake, to the extent practicable — Design the treated effluent diffuser to provide effective mixing and dilution of the effluent to limit the area of the receiving environment affected by mine discharge — Develop a site-specific water treatment plant to treat contaminants in effluent to appropriate release limits in accordance with site-specific water quality objectives, federal and provincial standards and regulations, and permit conditions. — Construct and operate a wastewater treatment plant to treat sanitary sewage and wastewater to appropriate release limits in accordance with provincial standards and permit conditions — Design diffuser/outfall such that discharged flow does not interact with bed sediment — Locate proposed treated effluent diffuser away from sensitive or unique habitats to the extent practicable — Collect, store and routinely monitor contact water to confirm discharge water meets water quality objectives and criteria appropriate for release — Develop and implement a monitoring plan that defines actions levels and documents steps to be taken to mitigate elevated concentrations of COPCs in treated effluent discharge to acceptable levels — Monitor treated sewage flow and quality — Characterize, identify, and manage potentially acid generating mine rock to prevent localized acid mine drainage and minimize metal leaching	— Surface Water — Fish and Fish Habitat — Vegetation, Wetlands and Protected Areas — Community Health and Well-Being

Project Activity or Effect	Environmental Design Features, Mitigation, or Enhancement Measures	Applicable Environmental Components
Altered site drainage, run-off and erosion and sediment control	— Provide adequate contact water storage capacity to manage run-off, seepage and inflows from the pit, Project infrastructure and disturbed areas — Minimize areas of vegetation clearing and soil disturbance — Limit steepness and length of slopes of disturbed areas and stockpiled soils — Avoid placing soil stockpiles near waterbodies (i.e., maintaining 150 m buffer from waterbodies and watercourses), and near natural drainage features, unless required for temporary storage — Locate borrow pits more than 100 m away from high-water mark of waterbodies, where possible. — Discharge water to waterbodies and watercourses in a manner that does not cause erosion or other damage to adjacent areas. — Schedule work in sensitive areas to avoid periods (e.g., spring freshet) that may result in high flow volumes and/or increased erosion and sedimentation, to the extent practical. — Routinely inspect and maintain containment and conveyance structures (i.e., roadside ditches and culverts) to limit the risk of road wash-out or sediment release to the environment. — Limit vegetation clearing and soil disturbance. — Mitigation measures for in-water works will include erosion and sedimentation measures including temporary settling ponds, which will be used to collect water and allow for suspended particles to settle prior to the discharge of water to the natural environment — Water diversions will be completed using industry-standard best management practices. — Instream construction will either be avoided or limited to when watercourses are not flowing, or are frozen to the bottom, where possible. — Mulch, coarse woody debris, or matting will be used on newly constructed stockpiles or recently replaced soils — Where practical and applicable, implement progressive reclamation and revegetation of disturbed areas no longer required. — Restore and revegetate areas where non-permanent Project features have been removed.	— Groundwater — Surface Water — Fish and Fish Habitat — Vegetation, Wetlands and Protected Areas — Wildlife and Wildlife Habitat
Contact water management	— Blend acid-generating material with non-potentially acid-generating material to reduce acid-generating potential. — Characterize, identify, and manage potentially acid generating mine rock to prevent localized acid mine drainage and minimize metal leaching. — Construct runoff and seepage collection ditches around the overburden stockpile, mine rock stockpile, tailing management facility and other Project facilities and divert seepage to collection ponds and effluent treatment plant. — During Construction, construction temporary water management facilities to capture and treat contact water. — Use of impermeable material (e.g., HDPE geomembrane) to seal dam slopes and collection ditches/ponds — Maintain water management infrastructure during Closure until water quality in the Rose Pit has reached acceptable discharge quality — Install engineered cover system on mine rock stockpile, and the TMF during Closure to promote positive passive drainage, limit ponding, and support revegetation — Routinely test surface and seepage water during Closure — During Closure, maintain seepage collection and mine water management systems associated with the mine rock stockpile as required to collect, convey and manage contact water for discharge to the bottom of the flooded pit through Closure and Post-Closure.	— Groundwater — Surface Water — Fish and Fish Habitat — Vegetation, Wetlands and Protected Areas — Wildlife and Wildlife Habitat — Community Health and Well-Being

Project Activity or Effect	Environmental Design Features, Mitigation, or Enhancement Measures	Applicable Environmental Components
Watercourse crossings, structure and in-water work	— Use standard methods and mitigation for culvert/bridge installations to maintain habitat connectivity for watercourses. — Alignment of site roads will be designed to minimize stream crossings and avoid sensitive habitat as feasible. — Design cross drainage structures to convey the maximum instantaneous flow resulting from a 1:10-year flood event. — Design crossing structures to limit the area disturbed within waterbodies and watercourses. — Culverts will be designed to allow fish passage where appropriate. Before construction, water flow conditions and fish presence will be assessed to establish a culvert design that allows for fish passage. — Water crossing structures will be constructed and installed in a manner that protects the banks from erosion and maintains the flows in the water body, and follows permits or authorizations issued for the Project from the appropriate regulatory agencies and DFO's Measures to Avoid Causing Harm to Fish and Fish Habitat (DFO 2025). — Culverts will be regularly inspected and maintained to prevent blockages from forming and causing ponding or backwater effects. Where culverts are installed at fish-bearing water bodies, debris removal activities will follow DFO's guidance (i.e., gradual removal such that flooding downstream, extreme flows downstream, release of suspended sediment, and fish stranding can be avoided). — Perform routine inspection and maintenance of water containment and conveyance structures (i.e., roadside ditches and culverts) to limit the risk of road wash-out or sediment release to the environment. — If required, instream construction will be completed in isolation from flowing water (i.e., using isolation methods to install culverts and multi-span bridges where surface water is present during construction). — For instream isolations/diversions, 100% downstream flow will be maintained, and, if required, pump intakes should not disturb the bed. Water diversion hoses will be screened as per DFO's Freshwater Intake End-of-Pipe Fish Screen Guidelines (DFO 1995; 2020). — Where possible, instream and in-lake construction in potential spawning habitat areas will occur outside the spawning period for fish VCs. Construction activities will be scheduled to avoid work during Fisheries and Oceans Canada's (DFO) Restricted Activity Timing Windows for the Protection of Fish and Fish Habitat (DFO 2019). If work outside of the timing windows is not possible, the appropriate approvals will be obtained to proceed. Restricted activity periods for fish VCs are as follows: - Lake trout and lake whitefish (September 1 to July 15); - Northern pike (May 1 to July 15); and - Ouananiche (October 1 to May 31). — A fish relocation plan will be developed that will follow and adhere to all regulatory requirements. — Apply DFO Measures to Avoid Causing Harm to Fish and Fish Habitat (DFO 2025). — Maintain hydrology at stream crossings through approved methods to install culverts.	— Surface Water — Fish and Fish Habitat — Vegetation, Wetlands and Protected Areas — Other Landa and Resource Use
Vegetation and wildlife habitat loss	— The SSA contains a buffer around the Project infrastructure. Efforts will be made to minimize the area of disturbance within the SSA to the extent possible. — Minimize the size of the Project footprint by implementing design elements to constrict the Project footprint where possible and minimize impacts on sensitive species, vegetation, and wetland habitat. — Avoid sensitive species and their habitats to the extent possible. — To the extent practicable, use existing road infrastructure, including existing access roads and watercourse crossings and rehabilitate access routes that are no longer needed. — Schedule clearing activities to avoid sensitive time periods for wildlife which may utilize the habitat (e.g., complete clearing operations outside of the breeding season for avifauna and bats). — Implement construction phasing to minimize open cleared areas at any one time. — From April to September (mandatory), avoid removing structures that may function as a bat maternity roost. A 200 m buffer must be maintained around an active bat maternity roost. — Avoid use of herbicides and pesticides to the extent possible. — Flag boundaries of sensitive areas before commencing any work in the area. — Conduct progressive reclamation with an emphasis on the use of native local species, provided they are effective in preventing dust lift and erosion. — Rehabilitate temporary access routes that are no longer needed. — Implement progressive re-grading and reclamation of the overburden stockpile (starting during Operations, where applicable), and the mine rock stockpile and TMF (starting during Closure). — Restore and revegetate areas where non-permanent Project features have been removed.	— Vegetation, Wetlands and Protected Areas — Wildlife — Other Land and Resource Use
Wetlands	— Implement and maintain natural buffer zones around riparian areas and wetlands where possible, use silt fencing as required and utilize settling ponds to minimize the release of sediment laden water to wetlands. — Using existing road infrastructure and watercourse crossings. — Monitor groundwater levels and wetland hydrology. — Use dewatering wells strategically to minimize impact, monitor groundwater levels and wetland hydrology, during construction, and restore water level post-construction. If effected wetlands provide sensitive habitat (i.e., habitat utilized by a critically imperiled/imperiled SOCC) use mitigative measures to maintain wetland hydrology (e.g., pumping and discharging of water into wetlands). — Minimize disturbance and infilling within adjacent wetlands and maintain hydrological conditions to the extent possible.	— Groundwater — Surface Water — Vegetation, Wetlands and Protected Areas — Wildlife

Project Activity or Effect	Environmental Design Features, Mitigation, or Enhancement Measures	Applicable Environmental Components
Vegetation	— Conduct invasive species management. — Conduct progressive reclamation with an emphasis on the use of native local species, provided they are effective in preventing dust lift and erosion. — Use mechanical vegetation clearing, and limit use of herbicides and pesticides to the extent possible. — Maximize the used of native plant species for revegetation, soil stabilization, and erosion control. — Inspect construction equipment prior to arriving at the site and clean, if required. Use the maintenance shop to support cleaning, once constructed, and as required. — Monitor restoration landscapes and adjacent vegetated areas and wetlands for the presence of invasive species and implement removal techniques, as appropriate. Include the presence of invasive species as a target of wetland environmental effects monitoring. — Retaining existing vegetation and landforms, to the extent practicable, to provide screening of activity and Project components. — Upon initial arrival of mobile equipment from elsewhere (outside the region) to which visible soil is adhered will undergo a washdown at a designated washdown location to remove potential sources of propagules (e.g., seeds/spores) of potentially invasive plants. The washdown area will be monitored the establishment of invasive species. If invasive species are encountered, they will be removed and destroyed by incineration.	— Vegetation, Wetlands and Protected Areas — Wildlife — Community, Health, and Well-being
Invasive species	— Use native plant species for revegetation, stabilize soils with erosion control measures, and monitor restoration success. — Prompt revegetation of overburden storage areas with native plant species to stabilize the soil, reduce erosion, and minimize the generation of runoff. — Use mechanical vegetation clearing, and limit use of herbicides and pesticides to the extent possible. — Use native plant species for revegetation, soil stabilization, and erosion control. — Check construction materials and test seed mixes for presence of invasive plants prior to use. — Inspect construction equipment prior to arriving at the site and clean, if required. Use the maintenance shop to support cleaning, once constructed, and as required. — Monitor restoration landscapes and adjacent vegetated areas and wetlands for the presence of invasive species and implement removal techniques, as appropriate. Include the presence of invasive species as a target of wetland environmental effects monitoring.	— Vegetation, Wetlands, and Protected Areas

Project Activity or Effect	Environmental Design Features, Mitigation, or Enhancement Measures	Applicable Environmental Components
Wildlife	— Allow wildlife to pass through construction sites without harassment. — Comply with provincial and federal legislation, permits, approvals, and guidelines. — Reduce road widths to minimize impact on habitat fragmentation. — Maintain gaps in access road berms and snowbanks at regular intervals to facilitate wildlife crossings at drainages, wildlife trails, or connected habitat patches so that wildlife movements across the access roads are not blocked, as determined in the field. — Maintain low snowbanks to allow passage of wildlife around access roads and railway corridor, where feasible — Incorporate design elements into the access road and railway that allow wildlife to pass around, over, or under (e.g., install culverts and underpasses at road crossings for amphibians and small mammals). — Conduct surveys of cabins for potential bat colonies prior to construction; if bats are found, handle according to regulator guidelines. — Avoid activities in wetlands and water features in the winter where salamanders may overwinter. — Conduct surveys for bear den presence/absence and wildlife tree surveys prior to clearing activities. — Supplement refuge habitat for prey species, where possible, by planting native species. — Include processes for prohibition of hunting or harassment of wildlife by employees on the Project site. — Yield the right of way to wildlife when operating equipment and vehicles. — Identify wildlife crossings and mark them with signage. — Restrict clearing activities to the period outside of the breeding bird season to the extent possible. If clearing and/or construction must occur during this period, nest search protocols will be implemented. If a nest of a migratory bird is discovered, the nest and surrounding vegetation will be left undisturbed until nesting is complete. Construction in the immediate area will be minimized until nesting is complete. — Restrict clearing and other activities within 800 m of an active raptor nest, and within 200 m of an inactive nest. — To the extent possible, clearing and grubbing of vegetation would be completed outside of the breeding/nesting season (i.e., early May to mid-August annually [Nesting Zone D6]), which would mitigate injury or mortality for nesting birds. If nests are discovered, the qualified biologist would consult with regulators, as required, to apply appropriate buffers to avoid disturbance. — Includes processes for prohibition of feeding wildlife, and other measures for deterring wildlife from site, where needed, for human and wildlife protection. These measures include: – Collect domestic (e.g., food) and industrial (e.g., used oil and lubricants) waste and temporarily store in wildlife-proof containers. – Dispose of waste/garbage properly to limit access by wildlife – ideally incinerated or transported off site for recycling, or disposed of at a licensed disposal facility, as appropriate. – Do not bury waste/garbage in the pit during progressive remediation activities. – Use mulch, coarse woody debris, or matting on newly constructed stockpiles or recently replaced soils to limit attraction of common nighthawks to exposed soil. – Limit lighting to levels required for safe operation to minimize attraction of bats and common nighthawks to lights. – Fence lined water management ponds to deter entrance–or they should be fitted with wildlife egress matting or ramps to help animals exit the ponds.	— Wildlife and Wildlife Habitat
Archaeological and Built Heritage Resources, or Cultural Heritage Landscapes	— No built heritage resources or cultural heritage landscapes were identified in the SSA. However, if the site study area (SSA) is expanded then additional Cultural Heritage Screening is required to assess the presence or absence of built heritage resources (architectural resources) and cultural heritage landscapes (cultural, spiritual, and heritage sites) in consultation with Indigenous communities, local stakeholders, and provincial agencies. — Design the Project in a manner that avoids or minimizes direct effects on archaeological resources, built heritage resources, and cultural heritage landscapes, where appropriate. — Prior to ground disturbance, any areas not previously assessed will be subjected to archaeological assessment. — Prior to ground disturbance, any areas identified as exhibiting high archaeological potential will be subjected to further archaeological investigation as identified by the licensed archaeologist and confirmed by the PAO. — Key construction and operational staff will be trained to recognize archaeological artifacts, such as Indigenous material culture (e.g., lithics, ground stone, ceramics) and Euro-Canadian cultural material (e.g., ceramics, glassware) in the event chance finds are made during Project construction and operation. Staff training will also include a brief history of the potential and documented historical use and occupation of the Project area. — A "Chance Find Procedure" will be implemented that will include that all activities in the area of the find will cease immediately until a licensed archaeologist is able to carry out a proper evaluation, working under permit and guidance from the NF PAO. — An "Accidental Discovery of Human Remains" protocol will be implemented. The protocol will be designed in advance of construction and will include input and direction from the PAO and local Indigenous communities. If human remains are encountered, all activities cease immediately, and local police are notified. — Where additional archaeological resources, built heritage resources, or cultural heritage landscapes are identified through information gathering or fieldwork: – Notify the Project team and Champion. – Identify next steps and additional reporting, as warranted. – Develop a chance finds procedure for the Project.	— Heritage and Historical Resources

Project Activity or Effect	Environmental Design Features, Mitigation, or Enhancement Measures	Applicable Environmental Components
Land and Resource Use	— Implement a cabin owner compensation program — Limit the SSA to the extent practical through site design: — Optimize use of cleared areas for Project activities. — Minimize the footprint (e.g., clustering buildings, co-locating linear infrastructure). — Minimize access restrictions in the LSA where safety permits. — Implement where agreed-upon processes for collection of information on land and resource use, Traditional Knowledge and issues scoping (with associated funding and resources). — Prohibit hunting and fishing by Project personnel in the SSA while working or residing on site. — Continue to share with the Indigenous groups Project information and updates on ongoing and planned activities, and undertake discussion of issues and potential means of addressing them as outlined in the Kami Engagement Plan (Annex 5G). — Continue to consult and engage with the identified Indigenous groups on land and resource use. — Implement progressive rehabilitation during Operations. — Restore public access to the SSA and LSA, where feasible, as part of the closure process. — Continuing to engage with the Town Councils of Labrador City and Wabush regarding regulations and permitting requirements. — Continue to engage with provincial authorities regarding regulations and permitting requirements. — Continue to engage with other tenure holders/industrial and commercial users to address any land use conflicts. — Conduct an inventory of existing cabins and owners and developing a plan to address issues. — Work with White Wolf Snowmobile Club to address effects on snowmobile trails. — Continue to engage with key stakeholders (e.g., Kami Working Group, cabin owners, municipalities, White Wolf Snowmobile Club).	— Indigenous Land and Resource Use — Other Land and Resource Use
Economy and Employment	— Post job qualifications early and identify available training and training providers so residents can acquire the necessary skills and qualify for potential Project employment. — Communicate employment skills requirements to training providers and educational institutions to plan appropriate Project-related training; participate in the development of training programs to inform needs. — Work with local communities to develop training programs oriented to operational needs. — Support retraining programs to establish transferable skills for employees during the latter part of the Operations phase. — Establish a Health and Wellness Strategy focused on employee mental health and wellness to complement health and safety programs and to support employees. — Provide on-site accommodations that are safe and welcoming for the Project workforce. — Provide transportation for employees to the worksite from a centralized location to facilitate employment of local and regional workers. — Advertise open job postings within the Indigenous communities as soon as possible. — Conduct recruiting programs as well as regular and effective outreach and communications with Indigenous communities to support recruitment. . — Support processes and initiatives related to employment readiness, training and educational initiatives with Indigenous communities, such as skills assessment, career counselling, referrals to education upgrading, creation of training plans, career sessions at local schools and educational site trips. — Establish a skills inventory and local and Indigenous business inventory that are regularly updated. — Give preference to qualified residents, persons belonging to under-represented groups (e.g., women, members of Indigenous communities) for employment and training opportunities. — Work with local and Indigenous businesses to enhance the opportunity to participate in the supply of goods and services (e.g., facilitate workshops about opportunities available, collaborate with small businesses to prepare bids in response to requests for proposal, provide business education). — Give preference to contracting for goods and services from businesses in Indigenous communities and local municipalities. — Establish and maintain a process to track local and regional contracting, subcontracting and procurement opportunities (as required by Government of NL). — Participate in the Labrador West Alliance, a Regional Working Group of mining companies, municipalities, provincial and federal government agencies and the Labrador West Chamber of Commerce, to jointly address regional challenges, such as attraction and retention of labour in all sectors. — Champion will fulfill the commitments in the Benefits Agreement and Gender Equity and Diversity Plan signed in 2014 to the best of Champion's abilities and develop an updated Gender, Equity, Diversity and Inclusion Plan to reflect current standards and expectations, followed by updating the Workforce and Employment Plan.	— Economy and Employment

Project Activity or Effect	Environmental Design Features, Mitigation, or Enhancement Measures	Applicable Environmental Components
Services and Infrastructure	— Accommodate non-resident workforce in permanent camp, located in the SSA and serviced with own water, wastewater, electricity and telecommunications. — Prepare a Workforce and Employment Plan prior to construction that would detail: – Strategy for housing non-resident construction workers prior to permanent camp being constructed. – Strategy for housing non-resident workers during operations when permanent camp is at capacity. – Communications protocols with short-term accommodation providers to monitor capacity and demand. — Engage local service providers, municipalities and infrastructure owners to communicate ongoing activities and monitor demand. — Provide basic services, such as a medical clinic and recreational facilities, at worker camps to reduce potential demand at local facilities. — Equip the Project with basic emergency services to respond to incidents or hazards on site. — Work with other emergency service providers on reciprocal service agreements. — Implement company policies and procedures. — Work with service providers, municipalities and infrastructure owners and operators ahead of, and during closure to minimize disruptions and potential impacts to staffing. — Participate in the Labrador West Alliance, a Regional Working Group of mining companies, municipalities, provincial and federal government agencies, and the Labrador West Chamber of Commerce, to jointly address community service and infrastructure issues, including housing stock, capacity of infrastructure (e.g., transportation), staffing in community support systems (e.g., health care, education, child care), workforce diversity and stability, and power supply. — Engage community organizations to identify and monitor any increase in demand for services associated with the Project. Work with the Labrador West Alliance to investigate opportunities for financial or in-kind support to these organizations. — Work with industry and rail service providers (e.g., QNS&L) to understand use of rail line and schedule movements to minimize disruptions. — Work with Wabush Airport on schedule for charter flights and/or communicate with airlines as required to coordinate scheduling of flights to accommodate non-resident workforce. — Prepare and implement a Traffic Management Plan prior to construction, to monitor any potential effects on local traffic and access routes as a result of construction and operations. — Engage local service providers, municipalities and infrastructure owners to communicate ongoing activities and monitor demand. — Provide basic services, such as a medical clinic and recreational facilities, at worker camps to reduce potential demand at local facilities. — Equip the Project with basic emergency services to respond to incidents or hazards on site. — Work with industry and rail service providers (e.g., QNS&L) to understand use of rail line and schedule movements to minimize disruptions. — Work with Wabush Airport on schedule for charter flights and/or communicate with airlines as required to coordinate scheduling of flights to accommodate non-resident workforce.	— Economy and Employment — Services and Infrastructure
Visual Aesthetics	— Retaining existing vegetation and landforms, to the extent practicable, to provide screening of activity and Project components. — Selection and location of structures to minimize visibility and visual contrast with existing conditions.	– Community Health and Well-being
Health and Safety Measures	— Implement and enforce operator training, seatbelt use, safe work procedures, terrain hazard mapping — Implement physical guarding of rotating parts, restricted access, lockout/tagout procedures, health and safety plans — Conduct remote operated equipment — Implement guarding systems, exclusion zones, maintenance program — Implement safe dumping procedures, berms at dumping edges, restricted access	— Accidents and Malfunctions
Fire / Explosion Measures	— Conduct blast audits, blast clearance procedures, controlled excavation of misfires — Conduct preventative equipment maintenance — Install fire extinguishers on mobile units, — Install fire detection, fire extinguishers, suppression systems and fire suppression kits on equipment — Implement fire prevention procedures, emergency response plan — Conduct fire watch during vegetation clearing — Hot work permits	— Accidents and Malfunctions — Effects of the Environment on the Project

Project Activity or Effect	Environmental Design Features, Mitigation, or Enhancement Measures	Applicable Environmental Components
Spill prevention / accidental release and response	— Standard spill prevention measures should be employed. These should include maintaining spill kits within all equipment so that minor spills can be contained; maintain larger spill kits throughout site should additional equipment be required for spill containment; have a spill response centre and team available to respond to larger spills. — During initial site works establish designated refuelling areas on hardened surfaces to catch accidental spills, located at least 50 m from any waterbody. — As the site workings and mining operations begin, have easily mobile equipment (e.g., haul trucks) refuel at designated refuelling stations (e.g., refuelling ditch) designed with a hard surface and proper grading so that any fuel spill is contained (adequate spill response equipment will be maintained at refuelling stations). Less mobile equipment (e.g., drill rigs and earth moving equipment) will be refuelled in place on a hard level surface as per-applicable regulations using a mobile fuel truck (adequate spill response equipment will be maintained at the refuelling location). — Non-mobile equipment (e.g., generators) will have double containment to contain any spilled fuel or leaking fuel. Double containment will be inherent, or the equipment will be located within a bermed area with an impervious liner to contain any spilled/leaking fuel. — Mine rock drainage management, including blending of potentially acid generating material with non-potentially acid generating material to achieve sufficient neutralization potential — A leak detection and collection layer may be included between the liner and subgrade in high-risk zones of the TMF (not always continuous across entire TMF) — The upstream slope of the TMF starter dam will be constructed with a high-density polyethylene (HDPE) geomembrane liner — A non-woven geotextile underliner is placed beneath the liner of the TMF starter dam to protect it from puncture by subgrade materials (rocks, roots, sharp objects) — The base below the geotextile is a sand-bedding layer, providing secondary containment and minimizing leakage risk — All pond embankments use non-potentially acid generating (NPAG) compacted rockfill with a seepage collection system . — Design of TMF and other dams following Canadian Dam Association guidelines. — Design includes 1-in-100-year flood protection, with emergency spillways and freeboard to avoid overtopping that could cause liner damage — Design of emergency spillways for extreme events, including probable maximum precipitation events — Design of collection ponds for extreme events, including probable maximum precipitation events — Fuel and chemical storage include double-walled tanks, secondary containment berms and regular tank inspections. — Energy dissipation structures at effluent and sewage discharges — Implement sediment and erosion control measures, as outlined in the Erosion and Sediment Control Plan (Annex 5F) — Use HDPE pipelines with pressure monitoring and pipeline inspections — Installation of pipelines will follow strict QA/QC protocols, including seam testing (both destructive and non-destructive) and field inspections — Piezometers, sumps, and monitoring wells will be installed to detect and collect any potential leakage from the pond base or embankments — Proper design of stockpile slopes — Proper feed control and regular inspections — Proper handling procedures, personal protective equipment use, spill response training, and health and safety plan — Secondary containment for pumps with spill kits available	— Groundwater — Surface Water — Fish and Fish Habitat — Vegetation, Wetlands, Protected Areas — Wildlife — Accidents and Malfunctions
Transportation safety measures	— Use certified transporters that comply with Transportation of Dangerous Goods — Implement vehicle and rail maintenance program — Conduct proper rail car loading and enforce speed restrictions — Controlled rail crossings with signals and barriers, public education, emergency response plan — Coordinate with rail authorities and municipalities — The Project will incorporate vehicle safety and traffic flow considerations into the design of roads, site layout, and haul route planning — Route planning to minimize public exposure, and implement defensive driving training to applicable staff — Manual inspection of rolling stock will be undertaken before trains are loaded at the mine site. Defective equipment will be removed from the train and kept out of service until repaired. — Track inspections will be carried out in accordance with Transport Canada regulations to identify track defects that could lead to derailment. — Implement Traffic Management Plan, including signage, communication, segregation of light and heavy vehicles, training and certification requirements	— Accidents and Malfunctions — Effects of the Environment on the Project

Project Activity or Effect	Environmental Design Features, Mitigation, or Enhancement Measures	Applicable Environmental Components
Mechanical / structural failure measures	– Install automated level control systems with overflow piping to containment areas – Install a backup dosing system with alarms on dosing rates – Install backup power systems (emergency generators), uninterruptible power supplies for critical loads – Install backup pumps with regular maintenance – Use certified crane operators, with lift plans and equipment inspections	— Accidents and Malfunctions — Effects of the Environment on the Project
Effects of the Environment on the Project	— Fire protection systems will be located across the mine site. Each system contains a water tank and a diesel-powered fire water pump, except for the system covering the process plant, which contains an electrical pump with a diesel pump as backup. The mine rescue team would be trained and certified in effective structural and wildland firefighting techniques. Firefighting equipment will be readily available. — Storage of material from clearing and grubbing for future re-use will be established and managed in a manner that minimizes erosion, discharge of effected water and risk of fire. Stockpiles, if required, will be built to allow easy access and inspection of the piles. — Scaling will be implemented to remove loose rocks, radar technology to detect faults or movements, geotechnical data analysis to assess soil and rock stability, adhering to distance standards to maintain safe distances between structures, and pre-cutting stop techniques to manage stress and prevent uncontrolled collapses. — Bench widths are selected to control rock fall hazard and to provide rock fall catchment for ravelling debris. The design of the pit (including dewatering plans) and associated drainage design take into account future changes to climate. — Actions will be taken to reduce the risks of wall movement and failures, including health and safety and production effects. — Groundwater levels around the pit will be monitored against the target pore pressures set in the slope stability analysis. An action plan with trigger pore pressures and a contingency plan will be developed to prevent pore pressure increase greater than the set target value. The pumps managing run-off will be designed to handle exceptional rainfall. A weather monitoring system will be established to evacuate the pit preventively in the event of an anticipated major deluge. — Pit design and drainage will account for future climate changes. — The open pit and associated infrastructure will be designed to accommodate estimated mine water inflows based on field hydraulic properties of the overburden materials and bedrock determined from field investigations. — Mechanical equipment would be inspected for damage after extreme temperature days. — The process plant and associated facilities including infrastructure such as site buildings, roadways, transmission lines, and sedimentation ponds will be designed and constructed in accordance with all applicable laws and regulations, industry standards, and codes and will incorporate and accommodate any anticipated effects of the environment. — Ventilation of critical areas susceptible to overheating may be inspected. — Infrastructure will be inspected for potential damage after major freeze/thaw events in the spring. — All dual piping will be designed and installed to standards that are designed for regional weather. — All materials used for construction of site buildings will comply with applicable building codes for anticipated temperatures and will maintain designed structural integrity. — Risks associated with severe snowstorms and snow loadings to facilities are managed through design criteria for the Project. — Lightning arresters will be installed at several locations on the mine site. — Project infrastructure and features will be designed and constructed in consideration of the risk of seismic activity. — The production plant would be designed for the site-specific climate and load requirements of all seasons. Mechanical equipment, as well as ventilation systems, would be inspected for damage after extreme temperature days. — Safety procedures would be in place to address worker safety, including inspecting infrastructure for potential falling snow hazards, and if necessary, issuing work stop orders. — Electrical equipment would be inspected for damage after freezing rain events. — Backup generators would be available to run power to critical systems in the event that power supply is interrupted. — Small quantities of hazardous material will be stored in a secure location protected from weather and freezing, as well as vehicle traffic. Daily equipment inspections will be conducted for leaks or damage. — Filters will be stored in a temperate place and controlled environment; sampling will be rescheduled in occurrence of extreme temperatures. — The proposed overburden and mine rock stockpiles will be designed for Closure using an ascending benched construction sequence that will integrate progressive rehabilitation activities during Operations and enhance stability. — The stockpiles have been designed with reduced steepness for stability and to meet reclamation requirements for Closure. — The overburden slopes will be benched and designed for water diversion and collection. Slopes will be designed with a minimum long-term safety factor of 1.5. — The external slopes of the mine rock stockpile will be constructed with a 3.5H:1V slope to avoid resloping at reclamation. The Rehabilitation and Closure Plan will be developed that will be adaptive to changing site-specific conditions — A systematic performance monitoring program will be implemented to maintain the physical integrity of the dams and ancillary structures at the TMF. Such a program will include regular visual inspections, engineering inspections and specific inspections following extreme events. — The cover systems for the stockpiles would be vegetated to reduce the potential for soil erosion from wind and water. Dry material will be wetted or covered to prevent blowing dust. Temporarily exposed soil and material stockpiles will be protected against wind erosion. Weather will be monitored for periods of high wind and dust suppression measures and/or control of activities will be implemented to mitigate excess dust generation.	— Accidents and Malfunctions — Effects of the Environment on the Project

Project Activity or Effect	Environmental Design Features, Mitigation, or Enhancement Measures	Applicable Environmental Components
	— Seepage through the containment dams will be limited and seepage control measures implemented downstream with a combination of ditches and sumps to allow for proper monitoring and pumping back into the TMF. To the extent possible, tailings will be discharged from the dam crests to form an upstream beach that will encourage water drainage away from the perimeter dams. — To account for the effects of climate change, the water management infrastructure (i.e., the TMF and water collection basins and ponds) for the Project was developed considering the increase in design rainfall. Each collection basin would be located in a natural low point to minimize the number of pumps required to manage precipitation and run-off into the treatment plant. Emergency spillways provide increased stability protection by preventing water from overtopping the dam. Precipitation and snow melt run-off that comes into contact with potentially contaminated areas would be captured, collected, and directed to site run-off ponds or collection areas. Spills in snow will be contained close to the release point and treated in a similar manner used for spill containment within water. Contingency pumps will be installed, rounds of inspections of basins and ditches will be conducted during heavy rainfall. — Ditches have been designed along the edges of all mine facilities, access roads, and around building pads to allow snowmelt to flow via gravity into the closest site run-off collection basin, where it would eventually be pumped into the closest collection pond or into the TMF for treatment and further discharge. — Collection ponds and pumping systems associated with the overburden stockpile and mine rock stockpile will be brought to their minimal level in the fall, will be shut down during winter and will be started before spring thaw. — Safety procedures would be in place to address worker safety, and would include reducing traffic speeds, addressing road conditions (e.g., snow removal, sanding) as quickly as possible, and if necessary, issuing work stop orders. — Any vehicles carrying waste off site will be secured to prevent windblown or other loss of load during transportation. — Vegetation clearing will be minimized to maintain existing trees and shrubs where possible to act as windbreaks and natural erosion prevention. — In case of extreme wind, loading rate will be adjusted, stacker-reclaimers will be secured by tying them down, or personnel will wait for wind to diminish — Rail breaks will be identified along the track through observation or instrumentation. — Inspection of railcar air systems will be conducted, systematic drainage of air system for winter season.	

COC = contaminant of concern; PAO = Provincial Archaeology Office; SAR = species at risk; SoCC = species of conservation concern; TMF = tailings management facility; WMP = Waste Management Plan;

Appendix 20B: Environmental Assessment Monitoring and Follow-up Programs Proposed for the Project

Table 20B-2: Environmental Assessment Monitoring and Follow-Up Programs Proposed for the Project

EIS Chapter	Monitoring Objectives	Monitoring Activities	Duration
Chapter 5: Air Quality and Climate	Monitor the performance and effectiveness of ambient air quality mitigation measures, minimize air quality pollution and contribute to continuous improvement.	**Ambient Air Quality Monitoring Program:** An ambient air monitoring program (including monitoring for COCs at select locations around the Project to be determined in consultation with the province. The program will be implemented during each Project phase to verify the air quality model predictions, assess the effectiveness of mitigation measures, and inform if further mitigation measures are required through adaptive management approaches. The monitors will be in addition to the existing ambient air quality monitors operated by the Iron Ore Company of Canada and Tacora in Western Labrador. Monitor locations will be determined following consultation with applicable regulatory agencies.	Implemented during the Construction phase and continued into the Operation phase.
	Meet regulatory GHG reporting requirements	— There will be a requirement to fulfill annual calculation of GHG emissions and reporting to appropriate federal and provincial governments based on requirements under the NL MGGA and the ECCC's GHGRP. — Annual GHG reporting is required under the NL MGGA for facilities emitting over 15,000 tonnes of carbon dioxide (CO^2) equivalent annually until the facility ceases operations or emits less than 14,000 tonnes for three consecutive years, after which it may apply for an exemption. — Annual GHG reporting is required under ECCC's GHGRP, administered under Section 46(1) of the *Canadian Environmental Protection Act* (CEPA) for industrial facilities emitting 10,000 tonnes of CO^2 equivalent annually.	Implemented during the Construction phase and continued into the Operation phase.
Chapter 6: Noise, Light and Vibration	Monitor noise levels at potentially sensitive receptors to verify mitigation measure effectiveness and contribute to continuous improvement.	**Noise Monitoring Plan** — Implementation of noise monitoring and measurements that consider applicable regulations, guidelines, and/or policies; indicators and PORs, remedial actions and complaints resolution processes should noise, and vibration concerns are brought forward. — Review of noise monitoring locations should be completed periodically and confirmed to determine appropriateness.	Implemented during the Construction phase and continued into the operation phase.
	Monitor blasting at potentially sensitive receptors to verify mitigation measure effectiveness and contribute to continuous improvement.	**Vibration Monitoring Plan** — A series of seismographs at varying distances from blasts will be established and a detailed record of the loading parameters will be kept for ground and air vibration level monitoring from blasting operations to develop site-specific vibration attenuation. — Instrumentation to monitor vibrations will be established at the nearest PORs (including for blasts within 525 m of the nearest active spawning bed during spawning season). — Instrumentation to monitor vibrations will be established at the nearest active fishery location for blasts within 275 m of a watercourse (this will include a hydrophone and data acquisition unit) to record water overpressure intensified during initial blasts. Periodic monitoring should be conducted as the blasts approach the nearest fishery.	Implemented during the Operation phase
Chapter 7: Groundwater	Monitor the performance and effectiveness of groundwater mitigation measures, avoid pollution of groundwater and contribute to continuous improvement.	**Groundwater Monitoring Plan** — Verify that water management infrastructure and facilities are operating as designed and evaluate effectiveness of surface water mitigations. — Establish groundwater monitoring for the measurement of groundwater prior to the start of construction in consultation with the province. — Evaluate the effectiveness of reclamation and other mitigation actions and modify or enhance as necessary through monitoring and developing updated mitigation measures (if needed).	Implemented during the Construction phase and continued through the Project closure phase
Chapter 8: Surface Water	Monitor the performance and effectiveness of surface water mitigation measures, avoid pollution of surface water and contribute to continuous improvement.	**Surface Water Monitoring Plan** — Surface water and sediment quantity and quality monitoring to confirm discharge meets appropriate threshold criteria and whether changes to water quality/quantity or sediment quality occur. — Monitor Project effluent quantity and quality discharged to the receiving environment. — Verify that water management infrastructure and facilities are operating as designed and evaluate effectiveness of surface water mitigations. — Monitor and track the trajectory of COPCs that were identified to exceed thresholds (e.g., cobalt, selenium) in the receiving environment and farther downstream. — Verify the predictions of the EIS and confirm that the aquatic ecosystem in the receiving environment is protected, evaluate the effectiveness of reclamation and other mitigation actions, and adjust/enhance any mitigations/monitoring efforts as necessary. — A Real-Time Monitoring Network Agreement in consultation with the Water Resources Management Division will be prepared and submitted to the Minister of Environment and Conservation, in order to receive the Minister's approval for the Real-Time Monitoring Network prior to the start of construction. — Surface water quantity and quality stations for the monitoring program will be determined following submission of the EIS in consultation with applicable regulatory agencies.	Implemented during the Construction phase and continued through the Project closure phase

EIS Chapter	Monitoring Objectives	Monitoring Activities	Duration
Chapter 9: Fish and Fish Habitat	Monitor the performance and effectiveness of mitigation and offsetting measures, minimize effects to fish populations and contribute to continuous improvement.	**Fish and Fish Habitat Monitoring Plan** — Verify the predictions of the EIS and confirm that the aquatic ecosystem/fish habitat in the receiving environment is protected, evaluate the effectiveness of reclamation and other mitigation actions, and adjust/enhance any mitigations/monitoring efforts as necessary. — Ensure the mine operation remains in compliance with the *Fisheries Act* and other relevant legislation, following the approval and initiation of the Project. The monitoring program should include: – Any environmental effects monitoring required under the Section 35 *Fisheries Act* authorization, including fish population surveys, water quality testing, habitat assessments or estimates, sediment testing and analysis, biological monitoring (e.g., benthic invertebrate surveys), hydrological surveys, habitat surveys, and redd surveys. – Any monitoring, testing, and/or reporting required under Section 36 of the *Fisheries Act* related to effluent monitoring, biological studies, and environmental effects monitoring/reporting. – Any monitoring, testing, and/or reporting required under the Department of Energy and Climate Certificate of Approval related to fish population sampling, water quality testing, and habitat assessments. — The Fish and Fish Habitat Offsetting Plan will be reviewed and requires approval by DFO prior to the beginning of the Construction Phase. Upon completion of the offsetting project, compliance monitoring will be completed in the St. Lewis River to assess the Project's effectiveness. — Monitoring will include fish surveys below and above the passage structure. — As part of monitoring, follow-up, and compliance, fish population sampling, fish tissue sampling, and benthic invertebrate studies will be completed to support requirements under the *Metal and Diamond Mining Effluent Regulations.*	Implemented during the Construction phase and continued through the Project closure phase
Chapter 10: Vegetation, Wetlands, and Protected Areas	Monitor wetlands to avoid effects, monitor the performance and effectiveness of water management infrastructure and contribute to continuous improvement.	**Construction Based Monitoring** — Verify the predictions of the EIS and confirm that the receiving environment is protected, evaluate the effectiveness of reclamation and other mitigation actions, and adjust/enhance any mitigations/monitoring efforts as necessary. — Monitor key early indicators of wetland health and provide that data to the tracking and interpretation. In the event that assessment of the data indicates that the current levels of mitigation are not effective, the EM/EMLs will work with the contractors to improve the mitigation. Increased monitoring of areas of concern will continue until monitoring indicates that the mitigation is effective.	Implemented during the Construction phase
		Long-term Monitoring — Verify the predictions of the EIS and confirm that the receiving environment is protected, evaluate the effectiveness of reclamation and other mitigation actions, and adjust/enhance any mitigations/monitoring efforts as necessary. — After consultation with regulatory agencies, the required sampling and assessment parameters for long term monitoring of the wetlands will be established. — The wetland monitoring program will include return visits to selected wetlands in the LSA where baseline conditions were gathered in 2023, including a functional assessment using the WESP-AC. The monitoring schedule should be established in consultation with regulators, possibly including site visits to selected wetlands in the LSA to document that Project mitigation measures are effective and confirm the actual total wetland effect area, for the purpose of establishing commitments to offset loss of wetland function.	Implemented during the Operation phase
Chapter 11: Wildlife and Wildlife Habitat	Monitor the performance and effectiveness of mitigation measures, mitigate effects to wildlife (including SAR/SOCC and migratory birds) and contribute to continuous improvement.	**Species at Risk or Species of Conservation Concern** — Verify the predictions of the EIS and confirm that the receiving environment is protected, evaluate the effectiveness of reclamation and other mitigation actions, and adjust/enhance any mitigations/monitoring efforts as necessary. — Wildlife and habitat monitoring, as well as SAR/SOCC monitoring will include both targeted and general observations. Any observations of SAR/SOCC will be reported to the wildlife Division.	Implemented during the Construction phase and continue observations into the Operations phase.
		Invasive Species Monitoring — Invasive alien plant species with potential to occur in Western Labrador, may include, but are not limited to: – Canada thistle (*Cirsium arvense*); – Coltsfoot (*Tussilago farfara*); – Tansy ragwort (*Senecio jacobaea*); – Common dandelion (*Taraxacum officinale*); and – Pineapple weed (*Matricaria discoidea*). — Construction areas will be monitored for invasive species and contractors will be required to implement invasive species management where required. — In the event that invasive species are identified in the field, the location will be logged with a GPS in addition to the species, photo number (if available) and date. The information will be provided for tracking in the compliance environmental management system and the contractor will be notified of the issue.	Implemented during the Construction phase and continue into the Operation phase.

EIS Chapter	Monitoring Objectives	Monitoring Activities	Duration
		Avifauna Mitigation and Monitoring Plan: — Verify the predictions of the EIS and confirm that the receiving environment is protected, evaluate the effectiveness of reclamation and other mitigation actions, and adjust/enhance any mitigations/monitoring efforts as necessary. — The AMMP will be further developed separately subsequent to the completion of the EIS and prior to construction. This plan will ensure compliance with conditions and established regulatory requirements and support biodiversity stewardship. — Monitoring requirements, including nest setbacks and observation protocols, will be tailored to the species and reproductive status. — If a migratory bird nest is identified during monitoring and a nesting bird shows signs of disturbance due to construction activities, the EM/EML will halt work until it is safe to resume. Nest monitoring will cease if the nest fails, is predated, or destroyed by natural events. All monitoring data will be recorded in the Environmental Management System to identify trends, such as nesting hotspots.	Implemented during the construction phase and continue into the Operation phase.

COC = contaminant of concern; COPC = contaminant of potential concern; EPP = Environmental Protection Plan; GHG = greenhouse gas; DOEC = Department of Energy and Climate; GHGRP = Greenhouse Gas Reporting Program; MDMER = *Metal and Diamond Mining Effluent Regulations*; MGGA = *Management of Greenhouse Gas Act*; SAR = species at risk; SOCC = species of conservation concern.


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21. Summary of Significance of Residual Effects

The purpose of **Chapter 21, Summary of Significance of Residual Effects** of the Environmental Impact Statement is to provide a tabular summary of the characterization of predicted residual effects on valued environmental components (VECs) of the biophysical, cultural, and socio-economic environments identified in the effect pathway screening of each applicable technical chapter (Chapter 5 to 17). The summary includes a determination of significance of the residual Project effects and cumulative effects (i.e., Reasonably Foreseeable Development [RFD] Case) for VECs. The summary also includes a comparison of the characterization and significance determination of residual effects presented in this EIS, with those presented in the Alderon EIS (2012).

The approach to the effect pathway screening is detailed in Section 4.7 of **Chapter 4, Effects Assessment Methodology**. As described in Chapter 4, the residual Project effects (i.e., effects remaining after the implementation of mitigation) were characterized using the following criteria:

- **Nature**–Classified as adverse (i.e., net loss or adverse effect), neutral (i.e., no change), or positive (i.e., net gain or beneficial effect). Nature may change over time; the Project could have adverse effects during some time periods and positive effects during other time periods.
- **Magnitude**–A measure of the intensity or the degree of change (i.e., effect size) caused by the Project and other developments, if applicable, relative to existing conditions. Established guidelines, thresholds, or screening values were considered where available. Magnitude is presented as a quantitative or qualitative expression of effect size or severity for a VEC relating to the respective measurable parameters. When categorical definitions were used, magnitude was classified as negligible, low, moderate, or high and supported by a reasoned narrative.
- **Geographic extent**–Refers to the area, distance covered, or zone of influence of the effect on VECs. The geographic extent of effects can occur at several different scales within the spatial boundary of the assessment and is specific to the VEC. Categorical classifications included effects that were confined to the SAA, effects that may extend beyond the SAA but are confined to the LSA, effects that may extend beyond the LSA but are confined to the RSA, and effects that may extend beyond the RSA (e.g., air emissions that contribute to atmospheric accumulation or climate change effects).
- **Duration**–Has two aspects: (1) the amount of time between the start and end of a Project activity and is related to Project phases; and (2) the time required for the effect on the VEC to be reversed. When duration was classified categorically, it was typically expressed as short term, medium term, long term or permanent, relative to Project activity periods or phases.
- **Timing**–Considers when residual effects are anticipated to occur, with a focus on seasonality. This criterion is defined categorically as applicable where seasonal aspects may affect a VEC or not applicable, where seasonal aspects are unlikely to affect a VEC.
- **Reversibility**–After removal of the Project activity or component, reversibility describes whether the Project would no longer influence a VEC at a future predicted time. This criterion usually has one of two alternatives: reversible or irreversible. Residual effects that are short term, medium term, or long term in duration are reversible. Permanent residual effects were considered irreversible. For instances where the duration of a residual effect may not be known but is expected to last beyond the temporal boundary of the Project (e.g., many decades after Closure is completed) and where science and logic indicated that the likelihood of reversibility is very low or uncertain, the residual effect was considered permanent and therefore irreversible, following a precautionary approach.
- **Frequency**–Refers to how often a residual effect would occur during the temporal boundary of the assessment. Occasional residual effects occur once (e.g., once during the installation of a culvert) or a few times (e.g., predicted maximum precipitation events during lifespan of the Project). Continuous effects occur constantly over a specified duration. Periodic effects occur at regular intervals or in association with temporal events (e.g., during breeding or spawning season, spring freshet, low flows, growing season, and plant harvest season).
- **Probability of occurrence**–Defined categorically as unlikely, possible, probable, or certain.
- **Ecological and socioeconomic context**–Takes into consideration the sensitivity and resilience of VECs (ecological context), and the cultural and social significance placed on certain VECs and the unique values, customs or aspirations of local communities or Indigenous groups that influence the perception of an effect (socioeconomic context) (IAAC 2024).

Residual adverse Project effects were carried forward to the cumulative effects analysis, as detailed in **Chapter 4, Effects Assessment Methodology**. Residual cumulative effects (i.e., effects remaining after the implementation of mitigation) were then characterized using the same criteria assessed for residual Project effects. For each VEC, the characterization of cumulative effects was conservatively completed for the phase or period (i.e., temporal snapshot) when adverse effects from the Project were predicted to be largest. The cumulative effects assessment for each VEC is provided in the technical chapters (Chapters 5 to 17).

The predicted changes in measurable parameters and associated residual effects classification of residual effect pathways provided the foundation for determining the significance of adverse effects from the proposed Project and other from previous and existing projects/activities and RFDs, and natural factors on VECs. Following the residual effects analyses of the Project and cumulative effects, a determination of significance was completed for VECs based on defined significance thresholds. Significance thresholds (i.e., significance definitions) were informed by the interaction between the residual effects criteria. Significance determination was binary, such that adverse Project and cumulative effects were either deemed significant or not significant for each VEC.

21.1 Summary of Significance

A summary of the residual effects classification and determination of significance of residual adverse effects of the Project on biophysical, cultural, and socio-economic VECs is provided in Table 21-1. A significance determination is also presented for the cumulative effects from the Project, other previous and existing projects and activities, and RFDs. Although not shown in Table 21-1, the classification of residual effects for the RFDs are provided in each technical chapter of the EIS (Chapters 5 to 17), where applicable. Overall, residual Project effects and residual cumulative effects were determined to be not significant.

Where applicable, the assessment considered how future climate change may interact with the Project and other developments to affect VECs. Although not shown in Table 21-1, climate change is considered in the residual effects classification table provided in each applicable technical chapter (Chapters 5 to 17).

Table 21-1: Summary of Residual Effects Characterization and Significance Determination for Valued Environmental Components in the Assessment of the Kami Mining Project

VEC	Measurable Parameter	Nature	Magnitude	Geographic Extent	Duration	Timing	Reversibility	Frequency	Probability of Occurrence	Ecological and Socio-economic Context	Significance of Residual Project Effects	Significance of Residual Cumulative Effects	Previous EIS (Alderon 2012) Residual Effect Classification and Significance Determination
Chapter 5: Air Quality and Climate													
Air Quality	Total particulate matter	Adverse	High: The 24-hour maximum predicted ground-level concentration is greater than the NLAAQS	Local	Medium term	Year round	Reversible	Continuous: Change is expected to occur at regular and frequent intervals (greater than 25% of the time)	Certain	Expected to exceed NLAAQS infrequently (<1%, 3 days per year at cabins and <1%, 1 day of the year at Duley Lake South). Local communities, cabins, existing mining operations and natural factors also contribute to the background concentrations.	Not Significant	Not Significant	Residual effects were predicted in the previous EIS (Alderon 2012) to be adverse, moderate in magnitude, local in geographic extent, short term to medium term in duration, regular to frequent in frequency, reversible, and not significant.
Air Quality	PM_{10}	Adverse	High: The 24-hour maximum predicted ground-level concentration is greater than the NLAAQS	Local	Medium term	Year round	Reversible	Continuous	Certain	Expected to exceed NLAAQS infrequently (4%, 13 days of the year at cabin locations, 1%, 5 days per year at Duley Lake South and <1%, 2 days per year at Fermont. Local communities, cabins, existing mining operations and natural factors also contribute to the background concentrations.	Not Significant	Not Significant	Residual effects were predicted in the previous EIS to be adverse, moderate in magnitude, local in geographic extent, short term to medium term in duration, regular to frequent in frequency, reversible, and not significant.
Air Quality	$PM_{2.5}$	Adverse	Moderate: The 24-hour and annual maximum predicted ground-level concentrations are below the NLAAQS but greater than 50% of the standard	Local	Medium term	Year round	Reversible	Continuous	Certain	No exceedances at cabins or communities predicted. Local communities, cabins, existing mining operations and natural factors also contribute to the background concentrations	Not Significant	Not Significant	Residual effects were predicted in the previous EIS to be adverse, moderate in magnitude, local in geographic extent, short term to medium term in duration, regular to frequent in frequency, reversible, and not significant.
Air Quality	Nitrogen dioxide	Adverse	Moderate: The 1-hour and 24-hour maximum predicted ground-level concentrations are below the NLAAQS but greater than 50% of the standard	Local	Medium term	Year round	Reversible	Continuous	Certain	No exceedances at cabins or communities predicted. Local communities, cabins, existing mining operations and natural factors also contribute to the background concentrations	Not Significant	Not Significant	Residual effects were predicted in the previous EIS to be adverse, moderate in magnitude, local in geographic extent, short term to medium term in duration, regular to frequent in frequency, reversible, and not significant.
Air Quality	Carbon monoxide	Adverse	Low: Maximum predicted concentration of Project emissions is greater than 10% of baseline conditions, but less than 50% of the corresponding NLAAQS	Local	Medium term	Year round	Reversible	Continuous	Certain	No exceedances at cabins or communities predicted. Local communities, cabins, existing mining operations and natural factors also contribute to the background concentrations	Not Significant	Not Significant	Residual effects were predicted in the previous EIS to be adverse, moderate in magnitude, local in geographic extent, short term to medium term in duration, regular to frequent in frequency, reversible, and not significant.
Air Quality	Sulphur dioxide	Adverse	Low: Maximum predicted concentration of Project emissions is greater than 10% of baseline conditions, but less than 50% of the corresponding NLAAQS	Local	Medium term	Year round	Reversible	Continuous	Certain	No exceedances at cabins or communities predicted. Local communities, cabins, existing mining operations and natural factors also contribute to the background concentrations	Not Significant	Not Significant	Residual effects were predicted in the previous EIS to be adverse, moderate in magnitude, local in geographic extent, short term to medium term in duration, regular to frequent in frequency, reversible, and not significant.
Air Quality	Metals	Adverse	Low: Maximum predicted concentration of Project emissions is greater than 10% of baseline conditions, but less than 50% of the corresponding NLAAQS	Local	Medium term	Year round	Reversible	Continuous	Certain	No exceedances at cabins or communities predicted. Local communities, cabins, existing mining operations and natural factors also contribute to the background concentrations	Not Significant	Not Significant	Residual effects were predicted in the previous EIS to be adverse, moderate in magnitude, local in geographic extent, short term to medium term in duration, regular to frequent in frequency, reversible, and not significant.

VEC	Measurable Parameter	Nature	Magnitude	Geographic Extent	Duration	Timing	Reversibility	Frequency	Probability of Occurrence	Ecological and Socio-economic Context	Significance of Residual Project Effects	Significance of Residual Cumulative Effects	Previous EIS (Alderon 2012) Residual Effect Classification and Significance Determination
Climate	Change in GHG emissions	_[a]	Low: Annual GHG emissions are between 0.1% and 1% of the annual provincial emission levels (<0.7%), or 0.01% and 0.1% of the annual federal emission levels (<0.01%)	_[a]	_[a]		_[a]	_[a]	_[a]	_[a]	Not Significant	N/A	Residual effects were predicted in the previous EIS to be adverse, moderate in magnitude, global in geographic extent, short term to medium term in duration, regular to frequent in frequency, reversible, and not significant.
Chapter 6: Noise, Vibration, and Light													
Noise, Vibration, and Light	Change in Noise Level during Construction	Adverse	Moderate	Local	Short-Term	Year round	Reversible	Periodic	Certain	Disturbed – local communities, cabins and existing mining operations contribute to the existing noise environment.	Not Significant	N/A	Residual effects were predicted in the previous EIS to be adverse, moderate in magnitude, local in geographic extent, short term in duration, regular in frequency, reversible, and not significant.
Noise, Vibration, and Light	Change in Noise Level during Operations	Adverse	Moderate	Local	Medium-Term	Year round	Reversible	Continuous	Certain	Disturbed – local communities, cabins and existing mining operations contribute to the existing noise environment.	Not Significant	N/A	Residual effects were predicted in the previous EIS to be adverse, moderate in magnitude, local in geographic extent, medium term in duration, frequent in frequency, reversible, and not significant.
Noise, Vibration, and Light	Change in Vibration Level during Construction	Adverse	Moderate	Local	Short-Term	Year round	Reversible	Periodic	Certain	Un-disturbed - the existing vibration environment has been assessed as near-null.	Not Significant	N/A	Residual effects were predicted in the previous EIS to be adverse, low in magnitude, local in geographic extent, short term in duration, sporadic in frequency, reversible, and not significant.
Noise, Vibration, and Light	Change in Vibration Level during Operations	Adverse	Moderate	Local	Medium-Term	Year round	Reversible	Periodic	Certain	Un-disturbed - the existing vibration environment has been assessed as near-null.	Not Significant	N/A	Residual effects were predicted in the previous EIS to be adverse, moderate in magnitude, local in geographic extent, medium term in duration, sporadic in frequency, reversible, and not significant.
Noise, Vibration, and Light	Change in Light Level During Construction	Adverse	Moderate	Local	Short-Term	Year round	Reversible	Periodic	Probable	Disturbed – local communities, cabins and existing mining operations contribute to the existing lighting environment.	Not Significant	N/A	Residual effects were predicted in the previous EIS to be adverse, low in magnitude, local in geographic extent, short term in duration, sporadic in frequency, reversible, and not significant.
Noise, Vibration, and Light	Change in Light Level During Operations	Adverse	Moderate	Local	Medium-Term	Year round	Reversible	Periodic	Probable	Disturbed – local communities, cabins and existing mining operations contribute to the existing lighting environment.	Not Significant	N/A	Residual effects were predicted in the previous EIS to be adverse, low in magnitude, local in geographic extent, medium term in duration, regular in frequency, reversible, and not significant.

VEC	Measurable Parameter	Nature	Magnitude	Geographic Extent	Duration	Timing	Reversibility	Frequency	Probability of Occurrence	Ecological and Socio-economic Context	Significance of Residual Project Effects	Significance of Residual Cumulative Effects	Previous EIS (Alderon 2012) Residual Effect Classification and Significance Determination
Chapter 7: Groundwater													
Groundwater	Change in groundwater quantity	Adverse	Low to moderate	Local	Medium to long term	During construction, operation and closure	Reversible	Occasional	Possible	Undisturbed/low development areas associated with the Project area.	Not significant	Not significant	Residual effects were generally determined to be low in magnitude, reversible, and not significant across all project phases. The effects were determined as adverse during Construction and Operation and Maintenance phases, and positive during Decommissioning and Reclamation. In addition, the geographic extent ranges from site-specific to local, and the duration range from short-term (<2 years) to medium-term (3-20 years). Effects were identified to be sporadic during Construction, rare during Operation and Maintenance, and occasional during Decommissioning and Reclamation.
Chapter 8: Surface Water													
Surface water quantity	Changes to flows, water levels and water balance components	Adverse	Low	Local	Long Term	Year round	Reversible	Periodic	Possible	Ecological. The Project effects are anticipated to effect ecological function that is expected to remain largely typical when compared to other lake systems in the region and to pre-development conditions.	Not significant	N/A	Residual effects were generally determined to be low in magnitude, reversible, and not significant across all project phases. The effects were determined as adverse during Construction and Operation and Maintenance phases, and positive during Decommissioning and Reclamation. In addition, the geographic extent ranges from site-specific to local, and the duration range from short-term (<2 years) to medium-term (3-20 years). Effects were identified to be rare during Construction and Operation and maintenance, and occasional during Decommissioning and Reclamation.

VEC	Measurable Parameter	Nature	Magnitude	Geographic Extent	Duration	Timing	Reversibility	Frequency	Probability of Occurrence	Ecological and Socio-economic Context	Significance of Residual Project Effects	Significance of Residual Cumulative Effects	Previous EIS (Alderon 2012) Residual Effect Classification and Significance Determination
Surface Water Quality	Changes to constituent concentrations	Adverse	Low	Local	Decades	Year round; more pronounced during Operations	Reversible	Continuous	Certain	Ecological. The Project effects are anticipated to effect ecological function that is expected to remain largely typical when compared to other lake systems in the region and to pre-development conditions.	Not Significant	N/A	Residual effects were generally determined to be low in magnitude, reversible, and not significant across all project phases. The effects were determined as adverse during Construction and Operation and Maintenance phases, and positive during Decommissioning and Reclamation. In addition, the geographic extent ranges from site-specific to local, and the duration range from short-term (<2 years) to medium-term (3-20 years). Effects were identified to be sporadic during Construction, rare during Operation and Maintenance, and occasional during Decommissioning and Reclamation.
Sediment Quality	Changes to constituent concentrations	Adverse	Low	Local	Decades	Year round	Reversible	Continuous	Possible	Ecological. The Project effects are anticipated to effect ecological function that is expected to remain largely typical (except for Pike Like with respect to selenium levels during post-closure) when compared to other lake systems in the region and to pre-development conditions.	Not significant	N/A	Since the sediment quality is largely qualitatively assessed in relation to predictions of water quality, the characterization of Project residual effects is also expected to generally follow the water quality predictions. In addition, previous EIS (2012) assessed Sediment Quality as part of the "Alteration of Water and/or Sediment Quality" parameter for Fish Health and Mortality.
Chapter 9: Fish and Fish Habitat													
Fish Habitat/Productivity	Change in River/Stream Flow	Adverse	Negligible	Local	Long term	Spring, Summer and Fall.	Reversible	Continuous	Probable	Alteration of flows may result in habitat fragmentation, alteration of water quality, and species which may inhabit an area, which can effect ecological processes.	Not Significant	N/A	Residual effects were predicted in the previous EIS to be neutral, low in magnitude, site specific, permanent duration, continuous in frequency, irreversible, undisturbed, and not significant.
Fish Health or Mortality	Loss of fish	Adverse	Negligible	Local	Long term	All seasons	Reversible and Irreversible (Pike Lake)	Occasional	Possible	Loss of fish on a large scale, especially during sensitive periods such as spawning, could affect ecological processes. Mitigations will reduce this probability; however, losses of a small number of individuals may occur, but will be negligible.	Not Significant	N/A	Residual effects were predicted in the previous EIS to be neutral to adverse, negligible in magnitude, site specific and local effects in terms of geographic extent, temporary duration, once to continuous in frequency, reversible, undisturbed and developed, and not significant.

VEC	Measurable Parameter	Nature	Magnitude	Geographic Extent	Duration	Timing	Reversibility	Frequency	Probability of Occurrence	Ecological and Socio-economic Context	Significance of Residual Project Effects	Significance of Residual Cumulative Effects	Previous EIS (Alderon 2012) Residual Effect Classification and Significance Determination
Fish Health or Mortality	Reduction in Fish Health	Adverse	Negligible	Regional	Short term	All seasons	Reversible	Occasional	Possible	Reduction in fish health could affect ecological processes and fisheries.	Not Significant	N/A	Residual effects were predicted in the previous EIS to be neutral to adverse, negligible in magnitude, site specific and local effects in terms of geographic extent, temporary duration, once to continuous in frequency, reversible, undisturbed and developed, and not significant.
Fish Health or Mortality	Alteration of Water and/or Sediment Quality	Adverse	High	Local	Long term	All seasons	Reversible and Irreversible (Pike Lake).	Periodic	Possible	Water quality and sediment changes may impact long-term fish health and the ecological processes of water features.	Not Significant	N/A	Residual effects were predicted in the previous EIS to be neutral to adverse, negligible in magnitude, site specific and local effects in terms of geographic extent, temporary duration, once to continuous in frequency, reversible, undisturbed and developed, and not significant.
Chapter 10: Vegetation and Wetland													
Vegetation (non-wetland)	Area Loss	Adverse	Moderate	Local	Medium term	All seasons	Reversible (with closure planning revegetation) and Irreversible (for areas with flooded pits)	Periodic: mainly during Construction	Certain	Loss of specific habitats would reduce the habitat available for recreational activities (e.g., loss of burned habitat utilized for berry picking).	Not Significant	N/A	Residual effects were predicted in previous EIS to be neutral to adverse, negligible in magnitude, site specific and local effects in terms of geographic extent, temporary duration, once to continuous in frequency, reversible, undisturbed and developed, and not significant.
Vegetation (non-wetland)	Dust (Air Quality)	Adverse	High	Local	Medium term	All seasons	Reversible	Continuous	Probable	Reduced species diversity resulting in effects on wetland functions, such as provision of habitat for wildlife and SAR (if present)	Not Significant	N/A	Residual effects were predicted in previous EIS to be neutral to adverse, negligible in magnitude, site specific and local effects in terms of geographic extent, temporary duration, once to continuous in frequency, reversible, undisturbed and developed, and not significant.
Wetlands	Area Loss	Adverse	Moderate	Local	Long term	All seasons	Irreversible	Continuous during Project lifetime	Certain	Changes in wetland areas would reduce wetland functions	Not Significant	N/A	Residual effects were predicted in the previous EIS to be positive to adverse, low to moderate in magnitude, site specific effects in terms of geographic extent, long term effects for duration, once to continuous in frequency, irreversible, undisturbed and developed, and not significant.

VEC	Measurable Parameter	Nature	Magnitude	Geographic Extent	Duration	Timing	Reversibility	Frequency	Probability of Occurrence	Ecological and Socio-economic Context	Significance of Residual Project Effects	Significance of Residual Cumulative Effects	Previous EIS (Alderon 2012) Residual Effect Classification and Significance Determination
Wetlands	Surface Water Changes	Adverse	Low	Local	Medium term	All seasons	Reversible	Continuous during Project lifetime	Probable	Changes in wetland hydrology could degrade wetland functions	Not Significant	N/A	Residual effects were predicted in the previous EIS to be positive to adverse, low to moderate in magnitude, site specific effects in terms of geographic extent, long term effects for duration, once to continuous in frequency, irreversible, undisturbed and developed, and not significant.
Wetlands	Groundwater Changes	Adverse	Low	Local	Medium term	All seasons	Reversible	Continuous	Probable	Changes in wetland hydrogeology could degrade wetland functions	Not Significant	N/A	Residual effects were predicted in the previous EIS to be positive to adverse, low to moderate in magnitude, site specific effects in terms of geographic extent, long term effects for duration, once to continuous in frequency, irreversible, undisturbed and developed, and not significant.
Wetlands	Dust (Air Quality)	Adverse	High	Local	Medium term	All seasons	Reversible	Continuous	Probable effect relative to regulatory NLAAQ guidelines, affects severity uncertain for wetlands	Reduced species diversity resulting in effects on wetland functions, such as provision of habitat for wildlife and species at risk (if present)	Not Significant	N/A	Residual effects were predicted in the previous EIS to be positive to adverse, low to moderate in magnitude, site specific effects in terms of geographic extent, long term effects for duration, once to continuous in frequency, irreversible, undisturbed and developed, and not significant.
Protected Areas	Area Loss	Adverse	Low	Local	Long term	All seasons	Irreversible	Continuous during Project lifetime	Certain	Loss of protected areas can lead to ecological degradation such as habitat fragmentation and disruption of ecosystem services and can contribute to socio-economic challenges such as reduced recreational opportunities and cultural effect.	Not Significant	N/A	Residual effects were predicted in the previous EIS to be positive to adverse, low in magnitude, local and site specific effects in terms of geographic extent, long term effects for duration, once to continuous in frequency, irreversible, undisturbed and developed, and not significant.

VEC	Measurable Parameter	Nature	Magnitude	Geographic Extent	Duration	Timing	Reversibility	Frequency	Probability of Occurrence	Ecological and Socio-economic Context	Significance of Residual Project Effects	Significance of Residual Cumulative Effects	Previous EIS (Alderon 2012) Residual Effect Classification and Significance Determination
Chapter 11: Wildlife													
Wildlife	Species at Risk and Migratory Birds (Habitat Loss and Alteration; Sensory Disturbance)	**Adverse**	**Moderate:** 8% to 22% habitat loss and alteration **Low:** sensory disturbance	**Local:** habitat loss and alteration **Local:** sensory disturbance	**Permanent:** habitat loss and alteration for habitat covered by permanent features and wetland habitat **Long term:** habitat loss and alteration for habitat covered by non-permanent features (at least five years after the end of Closure to establish breeding bird habitat) **Long term** for sensory disturbance (at least five years after the end of Closure to see recruitment)	**Seasonal:** summer breeding **Year-round:** spruce grouse habitat	**Reversible:** reclaimed habitat and sensory disturbance **Irreversible:** habitat covered by permanent features and wetlands	Continuous	Certain	The Project is expected to have ecological and socioeconomic impacts. However, these effects are expected to be restricted primarily to the LSA and be negligible.	Not Significant	Negligible Cumulative Effect	Residual effects were predicted in the previous EIS to be positive to adverse, moderate in magnitude, site specific effects in terms of geographic extent, long-term effects for duration, once in frequency, irreversible, undisturbed and developed, and not significant. Prediction confidence was high.
Wildlife	Bats (Habitat Loss and Alteration; Sensory Disturbance)	**Adverse**	**Moderate**: 12% habitat loss and alteration **Low:** sensory disturbance	**Local:** habitat loss and alteration **Local:** sensory disturbance	**Permanent:** habitat loss and alteration for habitat covered by permanent features and wetland habitat **Long term:** habitat loss and alteration for habitat covered by non-permanent features (at least 60 to 80 years after the end of Closure to establish mature ecosystems) **Long term** for sensory disturbance (at least five years after the end of Closure to see recruitment)	**Seasonal** – summer breeding and foraging habitat	**Reversible** (reclaimed habitat and sensory disturbance) **Irreversible** (habitat covered by permanent features and wetlands)	Continuous	Certain	The Project impacts on bats are not likely to have social impacts, but they could have economic impacts. However, impacts are expected to be limited and negligible.	Not Significant	Negligible Cumulative Effect	Residual effects were predicted in the previous EIS to be positive to adverse, low in magnitude, site specific effects in terms of geographic extent, long-term effects for duration, once in frequency, irreversible, undisturbed and developed, and not significant. Prediction confidence was high.

VEC	Measurable Parameter	Nature	Magnitude	Geographic Extent	Duration	Timing	Reversibility	Frequency	Probability of Occurrence	Ecological and Socio-economic Context	Significance of Residual Project Effects	Significance of Residual Cumulative Effects	Previous EIS (Alderon 2012) Residual Effect Classification and Significance Determination
Wildlife	Woodland Caribou (Habitat Loss and Alteration of Potential Future Habitat)	**Adverse**	Low	**Local** for impacts on habitat availability, survival and reproduction Regional for impacts on caribou distribution (movement and connectivity)	**Permanent** for habitat covered by permanent features and wetland habitat Long term for habitat covered by non-permanent features (at least 40 years after the end of Closure to establish caribou habitat)	**Year-round**	**Reversible** (reclaimed habitat and indirect loss from sensory disturbance) **Irreversible** (habitat covered by permanent features and wetlands)	Continuous	Certain	None of the boreal caribou ranges overlap with the Project SSA or wildlife LSA. The historical range of the George River herd overlapped with the Project's wildlife RSA. This population have undergone dramatic fluctuations and reductions in population size, and the range has retracted to 85% of its historical extent. The George River herd do not currently use habitat within the Project study areas.	Not Significant	Negligible Cumulative Effect	Residual effects were predicted in the previous EIS to be positive to adverse, low in magnitude, site specific effects in terms of geographic extent, long-term effects for duration, once in frequency, irreversible, undisturbed and developed, and not significant. Prediction confidence was high.
Wildlife	Terrestrial Mammals (Habitat Loss and Alteration; Sensory Disturbance)	**Adverse**	**Moderate**: 9% to 20% habitat loss and alteration **Low**: sensory disturbance	**Regional**: habitat loss and alteration Local: sensory disturbance	**Permanent**: habitat loss and alteration for habitat covered by permanent features and wetland habitat **Long term:** habitat loss and alteration for habitat covered by non-permanent features **Long term** for sensory disturbance	**Year-round**	**Reversible**: reclaimed habitat and sensory disturbance **Irreversible**: habitat covered by permanent features and wetlands	Continuous	Certain	Ungulates and furbearers are hunted, trapped, and of cultural importance to Indigenous groups. The populations in the wildlife RSA are not considered to be habitat-limited in the existing environment. Changes in habitat availability, habitat distribution, and survival and reproduction from planned developments are unlikely to affect the ability of moose, black bear, American marten and beaver populations to remain self-sustaining and ecologically effective.	Not Significant	Negligible Cumulative Effect	Residual effects were predicted in the previous EIS to be positive to adverse, low in magnitude, site specific effects in terms of geographic extent, long-term effects for duration, once in frequency, irreversible, undisturbed and developed, and not significant. Prediction confidence was high.
Wildlife	Amphibians (Habitat Loss and Alteration; Sensory Disturbance)	**Adverse**	**Moderate:** 8% to 20% habitat loss and alteration **Low:** Sensory disturbance	**SSA:** habitat loss and alteration **LSA:** sensory disturbance	**Permanent:** habitat loss and alteration for habitat covered by permanent features and wetland habitat **Long term:** habitat loss and alteration for habitat covered by non-permanent features **Long term** for sensory disturbance	**Year-round:** habitat loss and alteration; sensory disturbance	**Reversible:** reclaimed habitat and sensory disturbance **Irreversible:** habitat covered by permanent features and wetlands	Continuous	Certain	Two-lined salamander and wood frog are important prey species to some birds and mammals. They are key indicators of environmental health, particularly aquatic environments. Therefore, habitat loss and alteration, together with sensory disturbance, could impact abundance, distribution, survival, and reproduction of already sensitive species. Some species are also of cultural importance to Indigenous groups so that the Project may have socioeconomic impacts. However, impacts are expected to be restricted to the SSA and negligible.	Not Significant	Negligible Cumulative Effect	Residual effects were predicted in the previous EIS to be positive to adverse, low in magnitude, site specific effects in terms of geographic extent, long-term effects for duration, once in frequency, irreversible, undisturbed and developed, and not significant. Prediction confidence was high.
Wildlife	Amphibians Injury and Mortality from Clearing	Adverse	Moderate: moderate change in abundance in LSA is expected	SSA	Long term	Year-round	Reversible upon Closure	Continuous	Certain	Same as Amphibians (Habitat Loss and Alteration; Sensory Disturbance)	Not Significant	Negligible Cumulative Effect	Residual effects were predicted in the previous EIS to be positive to adverse, low in magnitude, site specific effects in terms of geographic extent, short-term effects for duration, once in frequency, reversible, undisturbed and developed, and not significant. Prediction confidence was high.

VEC	Measurable Parameter	Nature	Magnitude	Geographic Extent	Duration	Timing	Reversibility	Frequency	Probability of Occurrence	Ecological and Socio-economic Context	Significance of Residual Project Effects	Significance of Residual Cumulative Effects	Previous EIS (Alderon 2012) Residual Effect Classification and Significance Determination
Wildlife	Amphibians Air Emissions	Adverse	Low: substantial change in abundance in LSA is not expected	LSA	Long term	Year-round	Reversible upon Closure	Continuous	Certain	Same as Amphibians (Habitat Loss and Alteration; Sensory Disturbance)	Not Significant	Negligible Cumulative Effect	Not assessed in previous EIS (2012).
Wildlife	Amphibians Treated Effluent Discharge	Adverse	Low: substantial change in abundance in LSA is not expected	SSA	Long term	Year-round	Reversible upon Closure	Continuous	Certain	Same as Amphibians (Habitat Loss and Alteration; Sensory Disturbance)	Not Significant	Negligible Cumulative Effect	Not assessed in previous EIS (2012).
Chapter 12: Heritage and Historical Resources													
Heritage and Historical Resources	Alteration of heritage and historical resources	Not Applicable No residual effects on archaeological resources, built heritage resources, or cultural heritage landscapes were identified since mitigation measures will be implemented in advance of the construction phase of the Project.											The previous EIS predicted that residual effects resulting from Project construction and operation and maintenance are not likely to occur because the are no known sites within the PDA.
Heritage and Historical Resources	Loss, destruction or damage of heritage and historical resources	Not Applicable No residual effects on archaeological resources, built heritage resources, or cultural heritage landscapes were identified since mitigation measures will be implemented in advance of the construction phase of the Project.											The previous EIS predicted that residual effects resulting from Project construction and operation and maintenance are not likely to occur because the are no known sites within the PDA.
Chapter 13: Indigenous Land and Resource Use													
Indigenous Land and Resource Use	Limited Access to, and Loss of, Areas for Traditional Land and Resource Use	Not Applicable Given the limited available information respecting land and resource use by the identified Indigenous groups in the SSA or LSSA. Combined with the adoption of a conservative approach for the effects assessment, this Project interaction is assumed to result in negligible effect pathways to Indigenous Land and Resource Use. Consequently, they were not carried forward in the assessment of residual effects.											The previous EIS similarly determined a negligible effect pathway.
Indigenous Land and Resource Use	Disturbances Diminishing the Quality of the Experience of Traditional Land and Resource Use	Not Applicable Given the limited available information respecting land and resource use by the identified Indigenous groups in the SSA or LSSA. Combined with the adoption of a conservative approach for the effects assessment, this Project interaction is assumed to result in negligible effect pathways to Indigenous Land and Resource Use. Consequently, they were not carried forward in the assessment of residual effects.											The previous EIS similarly determined a negligible effect pathway.
Indigenous Land and Resource Use	Diminished Quality or Quantity of Harvests due to Effects on the Biophysical Environment	Not Applicable Given the limited available information respecting land and resource use by the identified Indigenous groups in the SSA or LSSA. Combined with the adoption of a conservative approach for the effects assessment, this Project interaction is assumed to result in negligible effect pathways to Indigenous Land and Resource Use. Consequently, they were not carried forward in the assessment of residual effects.											The previous EIS similarly determined a negligible effect pathway.

VEC	Measurable Parameter	Nature	Magnitude	Geographic Extent	Duration	Timing	Reversibility	Frequency	Probability of Occurrence	Ecological and Socio-economic Context	Significance of Residual Project Effects	Significance of Residual Cumulative Effects	Previous EIS (Alderon 2012) Residual Effect Classification and Significance Determination
Chapter 14: Other Land and Resource Use													
Other Land and Resource Use	Change in Recreation and Tourism	Adverse	Low	LSA	Medium-Term	Recreational and tourism activities may occur year-round, with a particular focus on winter activities	Reversible	Periodic during Construction and Closure Continuous during Operations	Certain	Resilient	Not Significant	Negligible Cumulative Effect	Not Significant
Other Land and Resource Use	Change in Harvesting	Adverse	Low	LSA	Medium-Term	Harvesting (e.g., hunting, trapping, fishing) is subject to regulated seasons and peak periods for certain activities (e.g., wood-cutting, trapping, berry-picking). Activities mainly coincide with fall, winter and spring seasons.	Reversible	Periodic during Construction and Closure Continuous during Operations	Certain	Resilient	Not Significant	Negligible Cumulative Effect	Not Significant
Chapter 15: Economy and Employment													
Economy and Employment	Change in GDP, employment, training, contracting and government revenues	Positive: results in net improvement or benefit to the economy and employment.	High: increased employment levels, skills levels, as well as incomes for workers and businesses in Labrador West, across NL and beyond. The Project will also increase government revenues and contribute to GDP.	Beyond Regional	Long-term	Not applicable	Reversible	Not applicable	Certain	GDP, employment, training, contracting and government revenues are key indicators of individual and community well-being. Good economic and employment conditions protect people from precarious living conditions and promote mental and physical health.	Not Applicable. Significance is not determined for residual Project effects that are characterized as positive.	Not Applicable The EIS for the Project does not consider positive effects in the cumulative effects analysis.	The previous EIS (2012) identified the following parameters: Change in Economy; Change in Employment, and; Change in Business: All changes in parameters were identified as positive, continuous, significant, and within the extend of the economic zone, Labrador, and the Province. Across all parameters, changes were medium-term during Construction, long-term during Operation and Maintenance, and Short-term during Decommissioning and Reclamation. In addition, the magnitude of changes were anticipated to be high during Construction and Operation and Maintenance, and low during Decommissioning and Reclamation
Economy and Employment	Change in opportunities for under-represented groups	Positive: results in net improvement or benefit to the economy and employment	Moderate	Regional	Long-term	Not applicable	Reversible	Not applicable	Certain				

VEC	Measurable Parameter	Nature	Magnitude	Geographic Extent	Duration	Timing	Reversibility	Frequency	Probability of Occurrence	Ecological and Socio-economic Context	Significance of Residual Project Effects	Significance of Residual Cumulative Effects	Previous EIS (Alderon 2012) Residual Effect Classification and Significance Determination
Chapter 16: Services and Infrastructure													
Services and Infrastructure	Housing and Accommodation	Adverse: Increase in demand for housing beyond existing capacity	Moderate: Demand for housing and accommodations will increase with limited anticipated changes to supply, and cost of available housing could also increase	Local	Medium-term	Not applicable	Reversible	Continuous	Certain	Demand for housing and accommodation likely to exceed existing vacancy and capacity in the housing market, particularly during the first two years of construction when non-resident workers would be required to be accommodated in Wabush and Labrador City.	Significant Effect. Effects are greatest to be during the final years of construction and initial years of operation, when the demand on these services will be highest.	There are no potential cumulative effects expected for services and infrastructure in the LSA with the identified RFDs.	The previous EIS (2012) provides information on residual effects on housing and accommodation for Western Labrador and Fermont. For Western Labrador, residual effects are adverse, continuous, within the extend of Western Labrador, and not significant through all Project phases. The magnitude of effects were moderate for Construction and Operation and Maintenance, whereas low for Decommissioning and Reclamation. The effects were identified as medium term for Construction and Decommissioning and Rehabilitation, and long-term for Operation and Maintenance. For Fermont, residual effects were adverse, low in magnitude, continuous, not significant, and within Fermont. The effects were identified as medium term for Construction and Decommissioning and Rehabilitation, and long-term for Operation and Maintenance.
Services and Infrastructure	Child care	Adverse (increased demand)	Moderate: Existing child care services are experiencing challenges to support current population. Users and potential users of these facilities would be sensitive to any increase in demand or decline in availability.	Local	Medium-term	Not applicable	Reversible	Continuous	Probable	Increase in permanent population (families) associated with the Project would increase demand for child care, beyond existing service capacity	Significant	N/A	The previous EIS (2012) provides information on residual effects on municipal services and infrastructure for Western Labrador and Fermont. For Western Labrador, effects were adverse, continuous, not significant, and within the extent of Western Labrador throughout all Project phases. The magnitude and duration of effects was low/medium-term for Construction and Decommissioning and Reclamation, and moderate and long-term for Operation and Construction.
Services and Infrastructure	Education and Training	Adverse: (increased demand)	Moderate: Services are experiencing human resource challenges to support existing population. Users and potential users of these facilities would be sensitive to any increase in demand or decline in availability.	Local	Medium-term	Not applicable	Reversible	Continuous	Probable	Increase in population associated with the Project would increase demand for education, beyond existing capacity of these services	Significant	N/A	

VEC	Measurable Parameter	Nature	Magnitude	Geographic Extent	Duration	Timing	Reversibility	Frequency	Probability of Occurrence	Ecological and Socio-economic Context	Significance of Residual Project Effects	Significance of Residual Cumulative Effects	Previous EIS (Alderon 2012) Residual Effect Classification and Significance Determination
Services and Infrastructure	Health care	Adverse (increased demand)	Moderate: Services are experiencing challenges to support existing population. Users of these facilities who may be affected would be sensitive to any increase in demand or decline in availability of these services.	Local	Medium-term	Not applicable	Reversible	Continuous	Probable	Increase in population associated with the project would increase demand for health care, beyond the existing capacity of these services.	Significant	N/A	For Fermont, residual effects were adverse, low in magnitude, continuous, not significant, and within the extent of Fermont throughout all Project phases. The effects were identified to be medium-term for Construction and Decommissioning and Reclamation, and Long-term during Operation and Maintenance.
Chapter 17: Community Health and Well-Being													
Community Health and Well-being	Change in Viewscapes	Adverse: The Visual Aesthetic Impact Assessment (TSD X) determined that the disturbance to the viewscape will be adverse but of moderate magnitude, meaning it will create a noticeable change but not be overwhelmingly disruptive	None (1 viewscape): Contrasting elements are not visible or perceived Moderate (4 viewscapes): Contrasting elements attract attention and/or begin to become dominant in the landscape Strong (3 viewscapes): Contrasting elements demand attention and/or dominate the landscape	Local	Long-term	May be partially affected by seasonality, significant snow cover may reduce contrast and noticeability of changes produced	Irreversible	Continuous	Certain	Resilient	Not Significant	Not significant.	The previous EIS determined that the Project would have potential adverse effects on viewscapes during construction and operations as well as positive effects during decommissioning and reclamation, though the residual effects were predicted to be not significant. The residual effects were identified to be continuous, reversible, and within the LSA throughout all Project phases. In addition, the effects were indicated to be permanent during decommissioning and reclamation, and medium-term for the rest of the Project phases.

Note:

(a) Most residual effects criteria do not vary due to the long-term to permanent (i.e., duration) and global nature (i.e., beyond regional extent) of GHGs. The effects of GHG releases are invariably adverse, continuous, and irreversible (i.e., lasting well beyond when the contribution of GHGs ceases); therefore, when considering GHGs, the only applicable residual effects criterion is magnitude.


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22. Engagement

The purpose of **Chapter 22, Engagement** of the Environmental Impact Statement (EIS) is to provide a description of Champion's approach to engagement, engagement activities, and summarizes results of engagement undertaken between Project initiation on November 22, 2022 and the EIS Submission.

This chapter meets the requirements as outlined in Sections 10 and 11 of the Environmental Impact Statement (EIS) Guidelines issued by the Newfoundland and Labrador (NL) Department of Environment and Climate Change (NLDECC) on December 19, 2024. In addition, this chapter profiles Champion's plans for ongoing engagement throughout the Construction, Operation and Maintenance, and Decommissioning and Rehabilitation (also referred to as Closure) phases of the Project as guided by Annex 5G, Kami Engagement Plan. The Kami Engagement Plan was developed to meet the requirements outlined in Sections 7.2.4, 7.2.5, and 7.2.8 of the EIS Guidelines for a Public Participation Plan, Indigenous Participation Plan, and Domestic Wood Cutting Consultation Plan, respectively.

22.1 Approach to Engagement

As described in **Chapter 1, Introduction**, Champion's commitment to responsible mining is reflected in its values. The following four core values are the cornerstone of Champion's beliefs and guide daily operations (Champion 2025a):

1) **Pride**–Develop a collective sense of belonging in all spheres of iron ore mining.
2) **Ingenuity**–Leverage employee creativity and expertise to achieve and maintain efficient practices aimed at operational excellence.
3) **Respect**–Respect people, resources, the environment, safety standards, partnerships, and equipment.
4) **Transparency**–Promote transparent communications through active listening and open dialogue.

Champion's dedication to developing strong relationships with Indigenous Peoples, local communities and other public stakeholders is based on the following three pillars (Champion 2025b):

1) providing a safe and inclusive working environment, avoiding social inequities, and respecting human rights
2) engaging with communities by respecting corporate values
3) protecting the environment and biodiversity

Champion views relationships of trust with Indigenous Peoples and local communities as key to the success and sustainability of its operations. It is through local community relationships that Champion can successfully create lasting benefits, minimize negative social and environmental effects in the areas where it operates, and advance its contributions toward sustainable development. Champion engages with communities by contributing to local economic development through local hiring, sourcing, and community investments.

22.1.1 Objectives

Champion's engagement objectives have been developed in accordance with the EIS Guidelines to help ensure a comprehensive and transparent engagement process. Champion's primary objectives are to:

- Provide regular updates and share Project information with stakeholders and Indigenous groups.
- Foster ongoing engagement with Indigenous groups and stakeholders throughout the EIS process and the duration of the Project.
- Identify potential issues of concern early in the process.
- Modify the Project design, where feasible, to avoid or mitigate adverse environmental effects.
- Demonstrate how issues and concerns raised during engagement activities have been addressed in the EIS.

This engagement process also extends outside the scope of the EIS process as other activities of Champion are conducted during this phase of the Project. Champion aims to minimize consultation fatigue with stakeholders and Indigenous groups by co-developing effective consultation and engagement processes.

22.1.2 Scope

The Government of Canada has a Duty to Consult, and where appropriate, accommodate Indigenous Peoples when it considers conduct that might adversely effect potential or established Aboriginal and/or Treaty Rights on Crown Land. The Duty to Consult is derived from Section 35 of the *Constitution Act, 1982* and is passed to the province of the NL through procedural aspects to fulfill this duty. While the Duty to Consult rests with the Crown and Champion does not intend to fill the role of the Crown, Champion recognizes that Project engagement may be used to inform or satisfy procedural aspects of Crown consultation. Champion has engaged with Indigenous groups as outlined in the EIS Guidelines. Champion has presented to Indigenous groups the optimizations made to the Project since the 2014 EA ministerial release and to continue improving the Project with the comments and recommendations from stakeholders and Indigenous groups.

Champion will engage with Indigenous groups to understand how the Project can be improved through their understanding of the land and perspective from their people. Champion will continue to present the evolution of the Project and establish a relationship based on trust and respect where recommendations and comments can be shared and discussed.

This chapter contains a summary of the engagement conducted with Indigenous groups, public stakeholders, and regulators and provides an overview of the implementation of Annex 5G, Kami Engagement Plan to date. Key terminologies are presented in Section 22.1.2.3. Key topics of interest, issues, and concerns are described in Section 22.1.2.4. The summary of engagement includes details of key topics of interest and issues and concerns raised by Indigenous groups, public stakeholders, and regulators. Sections 22.3, 22.4, and 22.5 provide an overview of the Indigenous groups, public stakeholders and regulators, respectively, which have been engaged with for the Project along with key engagement activities, summaries of feedback received, and key topic(s) of the interest, issue, or concern.

Additionally, this chapter provides an overview of the validation process in place to help to ensure concerns are appropriately considered through the EIS. Planned engagement activities and opportunities for Indigenous groups and public stakeholder participation for the Construction, Operations and Maintenance, and Decommissioning and Rehabilitation (Closure) phases of the Project are described in Section 22.7.

22.1.2.1 Background

As described in Chapter 1 the Kami Mining Project was originally proposed by the Alderon Iron Ore Corporation (Alderon) and underwent both provincial and federal EIS processes between 2011 and 2013 (Alderon 2012). Engagement activities on the Project with Indigenous groups, the public, local community stakeholders and regulatory agencies have been ongoing since 2011. Alderon completed engagement activities from 2011 to 2014 as part of the previous EA process and to support post-EA approval planning. Champion has been conducting engagement on the Project since the acquisition of the Project in 2021. This section summarizes the issues and topics of interest raised during the previous EIS through engagement on the Project.

Table 22-1 categorizes the topics of interest that were raised through engagement that was conducted by Alderon with Indigenous groups, the public and local community stakeholders between 2011 and 2014 through the completion of the previous EIS.

Table 22-1: Summary of Engagement Topic Categories and Topics of Interest

Topic Categories	Topics of Interest	
Atmospheric Environment	Air Quality Cumulative Effects on Atmospheric Environment	Dust Greenhouse Gas Emissions Noise
Community Services and Infrastructure	Availability of Housing for Workers Community Infrastructure Community Services Cumulative Effect on Community Services and Infrastructure Health Services	Increased Air Travel Increased Road Traffic Increased Railway Traffic Light Recreational Infrastructure Temporary Construction Camp
Consultation/EA Process	Indigenous Consultation EA Jurisdiction EA Schedule EIS Guidelines Financial Capacity for Consultation on the Project	Public Participation Project Description/Registration Project Schedule Translation of Public Information

Topic Categories	Topics of Interest	
Current Use of Lands and Resources	Access to Property Cabins Dog Sled Trails Fishing Activities Hunting Activities Land use Activities	Property Value Recreational Activities Snowmobile Trails Trapping Travel Routes Wood Harvesting
Current Use of Land and Resources by Indigenous Persons for Traditional Purposes	Cumulative Effects on Current Use of Land and Resources by Indigenous Persons for Traditional Purposes	Interaction with Existing Indigenous Rights or Title Traditional Land Use Activities by Indigenous Persons
Economy, Employment and Business	Apprenticeship and Training Availability of Local Workers Business Access Cumulative Effect to Economy, Employment and Business Diversity in the Workplace	Financial Benefit for Municipality Indigenous Employment and Business Opportunities Local Business Local Economy
Freshwater Fish, Fish Habitat and Fisheries	Cumulative Effects on Fish and Fish Habitat	Fish Habitat Fish Population
Health and Community Health	Cumulative Effects on Health and Community Health Human Health	Quality of Life Safety Visual Aesthetics
Historical and Cultural Resources	Archaeological Sites	Burial Sites
Landforms, Soils, Snow, and Ice	Acid Rock Drainage Cumulative Effects on Landforms, Soils, Snow and Ice	Reclamation and Rehabilitation Snow and Ice
Project Design and Location	Accidents and Malfunctions Alternative Source of Energy Availability of Power Economic Feasibility Location of Concentrate Storage Facility	Location of Access Road Location of Rail Location of Tailings Impoundment Location of Transmission Line Location of Mine Rock Piles Secondary Processing of Iron
Project Phases	Construction Engineering and Project Design Exploration	Monitoring and Follow-up Mining Operations Post-closure Period
Species At Risk, Birds, Other Wildlife and Their Habitat, and Protected Areas	Caribou Cumulative Effects on Wildlife and Species at Risk Parks and Protected Areas	Species at Risk Waterfowl Wildlife Habitat Wildlife Species
Water Resources	Cumulative Effects on Water Resources Waterbodies	Water Quality Water Management Water Supply
Wetlands	Effects on Wetland Stewardship Areas	Wetlands

Source: Alderon. 2012. Kami Iron Ore Mine & Rail Infrastructure, Labrador; Environmental Impact Statement. Volume 1, Part 1. September 2012.
EA = environmental assessment.

The five most frequently raised interest and issue topics from Indigenous groups follow:

- Indigenous employment and business opportunities
- Indigenous engagement processes
- interaction with existing Indigenous rights or title and opposition between Indigenous groups regarding each other's rights or title
- Traditional land use activities by Indigenous groups
- potential effects to wildlife species

The five most frequently raised issue and interest topics raised by the public and local community stakeholders follow:

- public participation
- potential effects of dust
- availability of housing for workers
- potential effects on cabins
- potential noise effects

Through the previous EA process, these issues and interests informed the development of mitigation measures and commitments made by Alderon. Champion is committed to adopting previous mitigation measures and commitments made by Alderon to address the issues and concerns raised during the previous EA process, which remain relevant to the Project. Champion has also considered these past issues and interests, and any new issues and interests raised through future engagement with Indigenous groups, the public and local community stakeholders when developing new mitigation measures to reduce adverse effects and maximize positive benefits from the Kami Mining Project.

Issues and concerns raised during the previous EA process have been addressed in the relevant chapters and technical support documents (TSDs) of this EIS. For reference, the following chapters address the VECs assessed as part of the current EIS:

- **Chapter 5, Air Quality and Climate**
- **Chapter 6, Noise, Vibration, and Light**
- **Chapter 7, Groundwater**
- **Chapter 8, Surface Water**
- **Chapter 9, Fish and Fish Habitat**
- **Chapter 10, Vegetation, Wetlands, and Protected Areas**
- **Chapter 11, Wildlife**
- **Chapter 12, Heritage and Historical Resources**
- **Chapter 13, Indigenous Land and Resource Use**
- **Chapter 14, Other Land and Resource Use**
- **Chapter 15, Economy and Employment**
- **Chapter 16, Services and Infrastructure**
- **Chapter 17, Community Health and Well-being**

22.1.2.2 Kami Engagement Plan

As part of the EIS Guidelines, Champion is required to conduct engagement with Indigenous groups and public stakeholders to aid in ensuring meaningful participation throughout the Project's life cycle. The requirements include public consultation obligations, key issues to be addressed, and the development of specific engagement plans. In addition to the requirements set out by the EIS Guidelines, in accordance with Section 58 of the provincial *Environmental Protection Act*, Champion must provide opportunities for public meetings in or near the Project area to inform the public about the Project and its potential environmental effects and record and respond to concerns from the local community.

Champion has developed and implemented an engagement plan, provided as Annex 5G, Kami Engagement Plan (KEP), to support ongoing engagement throughout all phases of the Project, including Construction, Operations and Maintenance, and Decommissioning and Rehabilitation. The KEP is intended to support the design and implementation of engagement and participation activities. The KEP outlines Champion's approach to continued engagement with Indigenous groups, public stakeholders, and other interested parties and details opportunities for continued and meaningful participation through subsequent phases of the Project (i.e., including Construction, Operations and Maintenance, and Decommissioning and Rehabilitation).

22.1.2.3 Key Terms

Effective communication and engagement rely on a shared understanding of key terms and concepts. Key terms are presented on Table 22-2.

Table 22-2: Key Communications and Engagement Terms

Term	Description
Indigenous group(s)	Used when discussing leadership/political entity identified for the current EIS by the NL Office of Indigenous Affairs and Reconciliation.
Indigenous communities	Used when discussing physical locations of communities
Indigenous Peoples	Broad term for Indigenous People, including First Nations, Inuit, and Métis, whose rights are protected under Section 35 of the *Constitution Act, 1982*
Indigenous Knowledge	Used when discussing knowledge based in the worldview of an Indigenous People[1]
Local Knowledge	Used when discussing knowledge about a specific geographic area shared by local stakeholders
Local communities	Used when speaking about Project-vicinity communities (i.e., Town of Fermont, Town of Wabush, and Town of Labrador City)
Public stakeholders	Used when speaking about non-Indigenous people or groups that could have an interest on the Project or influence the Project

EIS = environmental impact statement; NL = Newfoundland and Labrador.

22.1.2.4 Key Issues

Champion's engagement approach has prioritized re-engaging with Indigenous groups and public stakeholders who were involved in the previous EIS (Alderon 2012), where appropriate, to help to ensure continuity and comprehensiveness in addressing historical concerns. Engagement conducted as part of the previous EIS identified issues and concerns aligned with Project valued environmental components (VECs). Examples of VECs include wetlands, water quality, air quality, and wildlife (Alderon 2012). Issues identified in the previous EIS have been addressed throughout the EIS to demonstrate Champion's commitment to responsible mining.

In line with the EIS Guidelines, Champion has identified key topics of interest, issues, or concerns through engagement activities and fieldwork that relate to the following topics:

- existing electrical infrastructure
- water resources (e.g., wetlands and permafrost)
- air quality
- fish, fish habitat, and fisheries
- caribou, migratory birds, plant species, species at risk, and related habitats
- existing mining operations and planned expansions
- accessibility of land for future mineral exploration and mining
- community effects, human health, and quality of life
- protected public water supply areas and water quality
- socioeconomic development
- parks and protected areas
- heritage and cultural resources
- economy, employment, and business
- Indigenous Knowledge

[1] Indigenous Knowledge reflects the unique cultures, languages, values, histories, governance and legal systems of Indigenous Peoples (IAAC 2022). It is place-based, cumulative and dynamic (IAAC 2022). Indigenous Knowledge systems involve living well with, and being in relationship with, the natural world. Indigenous Knowledge systems build upon the experiences of earlier generations, inform the practice of current generations, and evolve in the context of contemporary society (IAAC 2022).

22.2 Engagement Activities

The KEP outlines Champion's approach to continued engagement with Indigenous groups, public stakeholders, and other interested parties and details opportunities for continued and meaningful participation through subsequent phases of the Project (i.e., including Construction, Operations and Maintenance, and Decommissioning and Rehabilitation).

In November 2023, Champion conducted a stakeholder mapping exercise to help identify which stakeholders remained active, relevant, or potentially affected by the current Project. Where stakeholder organizations had disbanded or were no longer considered directly affected, re-engagement was not pursued. Additionally, emerging stakeholders (e.g., some cabin owners associations) were identified and following a review of the stakeholders' proximity, interests, or potential to be affected, Champion commenced engagement.

Engagement for this EIS covers the period from Project initiation on November 22, 2022, to June 12, 2025. While Alderon had conducted previous engagements for the Project, Champion has undertaken a renewed engagement process to help to ensure transparency, continuity, and responsiveness to current context and concerns. To support this, the issues and concerns tables in this chapter include a column indicating whether each issue was also raised during the previous Alderon EIS.

Champion engagement activities conducted to date include:

- providing weekly fieldwork updates to public stakeholders
- providing regular in-person and virtual meetings with Indigenous groups and public stakeholders to provide updates on the Project
- hosting public information sessions
- participating in Labrador West Alliance meetings
- coordinating ongoing meetings with the Kami working group
- issuing formal correspondence through letters and direct outreach
- responding to inquiries via telephone, email, and virtual meetings
- proposing consultation agreements to Indigenous groups to meet the province's Consultation Policy on Land and Resource Development Decisions

These initiatives position engagement within a broader regional planning context and reflect Champion's commitment to supporting long-term, community-driven solutions.

Kami Working Group

In May 2024 a working group comprised of select local stakeholders was formed. The Kami Working Group includes the Towns of Fermont, Labrador City and Wabush, the Mills Lake Cabin Owners Association (MLCOA), the Riordan Lake Cabin Owners Association (RLCOA), the Duley Lake Cabin Owners Association (DLCOA), the White Wolf Snowmobile Club, and a Member of the NL House of Assembly. This group plays a key role in fostering collaboration, addressing Project-related concerns, and supporting Project-planning efforts.

Labrador West Alliance

From 2012 to 2014, a regional committee was formed to examine the challenges of community growth in Labrador West. The Regional Task Force, a committee which regrouped actors from the municipalities, the mining industry and government representatives, led to the submission of the Labrador West Regional Growth Strategy, also called the Plan BIG in June 2014. The Plan BIG identified nine "BIG topics" which needed to be addressed to contribute to the growth of the communities:

- environment
- community necessities
- community amenities
- logistics
- uncertainty
- land constraints
- infrastructure
- collaboration
- housing

The Plan BIG (2014) report stated that "of these [9 BIG topics], "the public has tended to highlight Housing (emphasizing affordability and variety), Community (including recreation and healthcare), Local Services (including retail) and Infrastructure (including air travel, road condition, and traffic)". The report also identified "weaknesses" such as housing supply, land availability for development, additional healthcare services, community infrastructures (airport, childcare, seniors housing, student housing, roadway, water and sewer, hydro and power upgrades and multi-purpose building), and "threats" such as isolation of the communities and the lack of connectivity, loss of recreational areas, the lack of infrastructure preventing population growth and the forced exodus of seniors due to the lack of seniors housing, the demand for FIFO workers.

The Regional Task Force committee was dissolved in 2014 as the Iron Ore Industry faced a financial low cycle. Champion was informed through informal exchanges with various local stakeholders that the Plan BIG was then put on the ice because of the financial situation that Labrador West was facing at the time.

Ten years later, in February 2024, the Labrador West Chamber of Commerce (LWCC) held a 3-days event called the Future of Lab West Summit. The objective of this summit was to examine and address the key challenges to regional development. The key thematic pillars identified for the summit were labour, industry (energy and mining), travel, housing and healthcare.

The Future of Lab West Summit concluded with very similar challenges identified in Plan BIG to be addressed to prepare Labrador West for the next decade (2030s), when new mining projects and expansions come to fruition. The increase in mining activities will necessitate investment in energy supply, housing, industrial and commercial, town infrastructure, local workforce for various sectors, travel, and public services.

Following the summit, a workshop was put in place in June 2024 with the purpose to rejuvenate the Regional Task Force. Named the Labrador West Alliance, this initiative formed a collaborative action group from which participating organizations have dedicated key people to collaboratively plan and implement solutions to challenges identified during the Future of Lab West Summit.

As of June 2024, Champion officially became a member of the Labrador West Alliance, composed of the Iron Ore Company of Canada; Tacora Resources; Champion Kami Partner Inc.; the Towns of Wabush and Labrador City; Department of Labrador Affairs (provincial); Department of Industry, Energy and Technology (provincial); the Atlantic Canada Opportunities Agency (federal); and the Labrador West Chamber of Commerce.

The Labrador West Alliance brings together industry, government, business, and community leaders to advance shared priorities. Its mission is to drive sustainable growth and diversification, unlock new opportunities, and help attract people to live and work in a thriving Labrador West region.

Engagement and Feedback Tracking

Champion has been actively tracking engagement efforts over the past two years to help ensure feedback from Indigenous groups and public stakeholders is meaningfully captured and considered throughout the EIS process. A Communications and Engagement Plan was developed by Champion in November 2023 to guide engagement activities during the provincial EA and approvals phases. The Communications and Engagement Plan outlines the approach to engagement tracking, as well as principles of engagement, communications protocols, and issue resolution strategies. Engagement tracking for this EIS follows the structure and approach detailed in the Communications and Engagement Plan.

Meeting summaries, weekly memos, and emails are archived in a centralized tracking database. All stakeholder and Indigenous groups feedback, which includes topics of interest, specific issues, and concerns, is input into the tracking database. Feedback is categorized by EIS components or Valued Environmental Components to help ensure concerns are addressed within the assessment process.

Organized by stakeholder, each feedback entry summarizes topics of interest, specific issues and concerns, and validation of those concerns. Issues and concerns are categorized by topic and specific area of concern. The topic categories are:

- environmental
- Project component
- Project phase
- socioeconomic

The validation of issues and concerns includes Champion's response and information on how each issue or concern was or are addressed is included throughout the EIS.

22.3 Indigenous Groups

Champion recognizes the unique relationship that Indigenous Peoples have with the natural environment in which they live. Champion is committed to developing and maintaining lasting relationships with Indigenous Peoples in aid of ensuring fruitful collaborations conducive to reconciliation and the establishment of a climate of understanding, trust, transparency, and mutual respect. Champion is therefore committed to the following:

- respecting the rights, interests, aspirations, culture, and natural-resource-based livelihoods of Indigenous groups in the design and development of its projects and operations
- seeking to reflect the diversity of host communities and Indigenous groups in Champion's workforce
- applying mitigation measures to address adverse effects of Champion's activities on host communities and Indigenous groups and offer them positive and lasting benefits
- seeking to obtain the voluntary, prior, and informed consent of Indigenous groups when considerable effects are likely to occur, either due to the relocation of property or the disturbance of land, territories, or cultural heritage that is important to Indigenous groups
- incorporating the results of discussions and engagement processes with host communities and Indigenous groups in the EA, Project mitigations, and agreements with host communities and Indigenous groups

The Crown has a Duty to Consult and, where appropriate, accommodate Indigenous Peoples when it considers conduct that might adversely effect potential or established Indigenous and/or treaty rights. The Crown may delegate procedural aspects of consultation to provinces and proponents. During the previous EA, five Indigenous groups were identified by the former Canadian Environmental Assessment Agency as potential Rightsholders (i.e., as having potential Indigenous and/or treaty rights that could be adversely affected by the Project). The Indigenous groups include:

- Innu Nation
- Innu Takuaikan Uashat mak Mani-Utenam (ITUM)
- La Nation Innu Matimekush-Lac John (NIMLJ)
- Naskapi Nation of Kawawachikamach (NNK)
- NunatuKavut Community Council (NCC)

The NL Office of Indigenous Affairs and Reconciliation confirmed to Champion that the Indigenous groups previously identified for the current EIS remain the same as those requiring engagement during the previous EIS.

As Duty to Consult rests with the Crown, Champion's approach to Indigenous engagement is not intended to replace the Crown's Duty to Consult obligations with respect to the Project; however, it is recognized that engagement conducted by Champion may be used to inform or satisfy procedural aspects of Crown consultation. Champion is committed to working with provincial regulators and will provide regular updates via the KEP (Annex 5G) throughout the Project life cycle regarding engagement activities with Indigenous groups. Champion is also willing to provide opportunity or facilitate provincial government participation during KEP activities with Indigenous groups.

Over the past two years of engagement with the five Indigenous groups identified for the Project, Champion has been approached to initiate discussions regarding the development of Impact Benefit Agreements. Champion remains committed to fostering strong, respectful relationships and advancing mutually beneficial outcomes related to the Kami Mining Project. However, to respect the confidentiality of these discussions and uphold the integrity of ongoing negotiations, the content of Impact Benefits Agreement discussions will not be disclosed within this EIS.

Champion is committed to working with provincial regulators and will provide regular updates throughout the Project life cycle regarding engagement activities with Indigenous groups. Champion is also willing to provide opportunities to facilitate provincial government participation during KEP activities with Indigenous groups.

The following subsections provide an overview of key engagement activities completed to date with each Indigenous group.

22.3.1 Innu Nation

The Innu Nation represents the Innu communities, including the Mushuau Innu of the Natuashish and the Sheshatshiu Innu First Nation living in Sheshatshiu (Innu Nation 2025). As of 2025, the registered population of the Mushuau Innu First Nation is 1,190 (CIRNAC 2025) and 1,967 for the Sheshatshiu Innu First Nation (CIRNAC 2025a). Additional information about Innu Nation is provided in Annex 4C, Land Use and Socioeconomic Baseline Report.

22.3.1.1 Engagement Activities

On October 16, 2023, Champion provided Innu Nation with a Project introduction letter to notify Innu Nation about the Project. Champion and Innu Nation first met on November 22, 2023, to discuss the Project. To date, they have addressed key topics, including labour needs, potential training opportunities for Innu Nation members, engagement processes and preferences, permitting requirements, potential compensation and offsetting programs, and the EIS Guidelines. Discussion has also focused on identifying and addressing potential concerns raised by Innu Nation regarding the Project. Efforts are ongoing to establish a proposed Consultation Agreement to support continued collaboration.

Table 22-3 provides a summary of key engagement activities undertaken with Innu Nation between Project initiation in November 22, 2022, and April 11, 2025.

Table 22-3: Innu Nation–Key Engagement Activities

Date	Activity	Summary
October 16, 2023	Letter	Champion provided Innu Nation with a Project introduction letter and offered to arrange a meeting to discuss the Project.
November 2, 2023	Meeting (in person)	Champion and Innu Nation met to discuss expectations and concerns regarding engagement activities, as well as Project labour needs and potential training opportunities for Innu Nation members.
November 29, 2023	Meeting (virtual)	Champion and Innu Nation met to discuss engagement processes.
February 14, 2024	Meeting (in person)	Champion and Innu Nation met to discuss the Project and permitting processes. Champion presented the Kami Mining Project. Project economics, timeline of activities, mining components, identified challenges, and strategy and vision were presented. Similarities and optimizations of the Project were compared to the previous project from Alderon in 2012.
May 30, 2024	Meeting (virtual)	Champion and Innu Nation met to discuss the Project and Traditional land use and began engaging on a potential consultation Agreement for the EIS as well as the upcoming authorization requests for the winter advanced exploration campaign.
June 6, 2024	Email	Following the submission of the Project Registration, Champion followed up to make sure Innu Nation had the necessary information to review the Project Registration document and offered the opportunity to provide more information or hold a meeting with them to answer their questions.
September 3, 2024	Email	Champion provided Innu Nation with a potential Consultation Agreement to guide the consultation process. Champion requested that Innu Nation provide feedback on the Agreement and requested a meeting to present the EA preliminary results.
September 18, 2024	Meeting (virtual)	Champion and Innu Nation met to discuss the Project, information sharing, and the Consultation Agreement.
October 17, 2024	Meeting (in person)	Champion and Innu Nation met to discuss the Project, including Project optimizations, the EIS process, the Consultation Agreement, engagement processes, and a potential compensation program.
November 5, 2024	Meeting (in person)	Innu Nation and Champion met during the Mineral Resources Review to exchange on the Project, EIS participation and timelines, the Consultation agreement. Innu nation also provided Champion with a letter and additional background information concerning the Project's engagement processes.
January 21, 2025	Meeting (virtual)	Champion and Innu Nation met to discuss the Consultation Agreement, the EIS Guidelines, and continued collaboration.
January 27, 2025	Meeting (virtual)	Champion and Innu Nation met to discuss the Consultation Agreement, the EIS Guidelines, and continued collaboration.
January 29, 2025	Meeting (virtual)	Champion and Innu Nation met to discuss the Project timeline, the Consultation Agreement, and continued collaboration.
April 11, 2025	E-mail	An EIS pre-submission package was shared with all Indigenous groups for collaboration, comments and improvement. The submission included the following elements: Project overview and schedule, approach to engagement, overview of engagements, up to date and topics of interest, socioeconomic profile and a copy of the Traditional land use from the previous (Alderon) EIS.

EA = environmental assessment; EIS = environmental impact statement.

22.3.1.2 Topics of Interest, Issues, and Concerns

Innu Nation raised topics of interest and concerns as well as identified issues regarding capacity building, engagement processes, agreements and negotiations, regional infrastructure and services, and environmental matters. Innu Nation expressed interest in potential opportunities with Champion. Innu Nation also expressed their opposition to recognize NCC as rightsholders.

Table 22-4 outlines the EIS chapters that address the issues and concerns raised by Innu Nation. Mitigation measures are summarized in the associated chapter of the EIS referenced in the table below and commitments are outlined in **Chapter 23, Commitments Made in the Environmental Impact Statement**.

Table 22-4: Innu Nation's Issues and Concerns

Topic of Interest	Issue or Concern	Summary of Issue or Concern	Where Addressed in the EIS	Raised in Alderon EIS (Yes/No)
Socioeconomic	Capacity building	Innu Nation requested the implementation of early training programs to equip community members with the necessary skills for employment opportunities related to the Project.	– Chapter 15: Economy and Employment – Chapter 17: Community Health and Well-being	Yes
		Innu Nation needs investment in the well-being of their youth.	– Chapter 17: Community Health and Well-being	No
	Workforce and employment	Innu Nation is in favour of FIFO to provide employment opportunities to their community members.	– Chapter 15: Economy and Employment – Chapter 17: Community Health and Well-being	No
	Engagement processes	Innu Nation stated they would not disclose confidential land use data.	– Chapter 22: Engagement The sensitivity of confidential land use data is acknowledged. Champion encourages sharing of any non-confidential information in the future, through continuation of the relationship between Champion and Innu Nation.	No
		Innu Nation requested full-time involvement in all aspects of the EA.	– Chapter 22: Engagement Champion issued a consultation agreement to meet the province's Consultation Policy on Land and Resource Development Decisions.	Yes
		Innu Nation requested to receive all permit requests as a bundled package to facilitate their review and analysis.	– Chapter 22: Engagement Champion provided a copy of all permit applications that are of interest to Innu Nation as part of their review process. Innu Nation would favour bundled packages of permit application to facilitate and accelerate the revision of permit applications.	No
		Innu Nation stated they reject NCC's claims to Indigenous identity and expressed their opposition to Champion engaging with NCC on the Project.	– Chapter 22: Engagement Champion acknowledges this feedback. Champion is committed to following the Duty to Consult requirements as outlined by the NL Office of Indigenous Affairs and Reconciliation.	No

Topic of Interest	Issue or Concern	Summary of Issue or Concern	Where Addressed in the EIS	Raised in Alderon EIS (Yes/No)
	Agreements and negotiations	Innu Nation showed interest in potential opportunities with Champion.	– Chapter 15: Economy and Employment – Chapter 17: Community Health and Well-being	Yes
	Regional infrastructure and services	Innu Nation expressed interest in benefiting from the railway, potentially through a joint venture.	– Chapter 15: Economy and Employment – Chapter 17: Community Health and Well-being	Yes
Environmental	Environmental	Innu Nation emphasized that environmental protection is of top importance to Innu Nation.	– Chapter 5: Air Quality and Climate – Chapter 7: Groundwater – Chapter 8: Surface Water – Chapter 9: Fish and Fish Habitat – Chapter 10: Vegetation, Wetlands and Protected Areas – Chapter 11: Wildlife	Yes

FIFO = fly-in fly-out; EA = environmental assessment; EIS = environmental impact statement; NCC = NunatuKavut Community Council.

22.3.2 Innu Takuaikan Uashat mak Mani-Utenam

ITUM have reserve lands in Sept-Îles and 16 km away from Sept-Îles (CIRNAC 2025b) but is located approximately 300 km south of the Project (straight line distance). ITUM has 5,183 people as registered population (CIRNAC 2025c). Additional information about ITUM is provided in Annex 4C.

22.3.2.1 Engagement Activities

On October 16, 2023, Champion provided ITUM with a Project introduction letter to notify ITUM about the Project. Champion and ITUM first met on October 23, 2023, to discuss the Project. To date, they have addressed key topics, including engagement processes and preferences, the flotation plant, and nearby rail infrastructure. Discussion has also focused on identifying and addressing potential concerns raised by ITUM regarding the Project. Efforts are ongoing to establish a proposed Consultation Agreement to support continued collaboration.

Table 22-5 provides a summary of key engagement activities undertaken with ITUM between Project initiation on November 22, 2022, and May 2, 2025.

Table 22-5: Innu Takuaikan Uashat mak Mani-Utenam–Key Engagement Activities

Date	Activity	Summary
October 16, 2023	Letter	Champion provided ITUM with a Project introduction letter and offered to arrange a meeting to discuss the Project.
October 23, 2023	Meeting (in person)	Champion and ITUM met to discuss the Project and engagement processes. Champion presented the Kami Mining Project. Project economics, timeline of activities, mining components, identified challenges and strategy and vision were presented. Similarities and optimizations of the Project were compared to the previous project from Alderon in 2012.
January 31, 2024	Meeting (in person)	Champion and ITUM met to discuss the Project.
February 7, 2024	Meeting (in person)	Champion and ITUM met to discuss the Project. ITUM expressed interest on potential business opportunities.
March 25, 2024	Meeting (virtual)	Champion and ITUM met to discuss the Project, during which Champion provided an update on the advancement of the field campaign.
April 25, 2024	Meeting (virtual)	Champion and ITUM met to discuss the Project and the Project Registration submission.

Date	Activity	Summary
May 21, 2024	Meeting (virtual)	Champion and ITUM met to discuss the Project and the Project Registration submission, and began discussions regarding a potential consultation agreement for the EIS and the permitting requirements for the winter advanced exploration campaign.
June 6, 2024	Email	Following the submission of the Project Registration, Champion followed up to make sure ITUM had the necessary information to review the Project Registration document and offered the opportunity to provide more information or hold a meeting with them to answer their questions.
September 3, 2024	Email	Champion provided ITUM with a Consultation and Engagement Compliance Agreement and invited ITUM to provide feedback on the agreement.
September 17, 2024	Meeting (virtual)	Champion met with ITUM to discuss the Consultation and Engagement Compliance Agreement. Champion inquired about ITUM's intentions to participate in the Project Impact Study and whether ITUM planned to develop a land use study. ITUM indicated they would provide further clarity on their position regarding the studies at a later date.
November 18, 2024	Meeting (virtual)	Champion and ITUM met to discuss the advancement of the EIS submission process and how ITUM can participate in the process.
February 21, 2025	Meeting (virtual)	Champion and ITUM met to discuss the Kami EA impact study and the consultation agreement.
April 11, 2025	E-mail	An EIS pre-submission package was shared with all Indigenous groups for collaboration, comments and improvement. The submission included the following elements: Project overview and schedule, approach to engagement, overview of engagements, up to date and topics of interest, socioeconomic profile and a copy of the Traditional land use from the previous (Alderon) EIS.
May 2, 2025	E-mail	ITUM provided comments on the EIS pre-submission package related to the description of the community in Chapter 13, Section 13.4.3.2.

ITUM = Innu Takuaikan Uashat mak Mani-Utenam; EIS = environmental impact statement; EA = environmental assessment.

22.3.2.2 Topics of Interest, Issues, and Concerns

ITUM expressed interest in Project components and Project consultation. ITUM raised concerns and identified issues regarding the consultation agreement, their position on other Indigenous groups claim on the land where the Project is located and their opposition to recognize NCC as rightsholders.

Table 22-6 outlines the EIS chapters that address the issues and concerns raised by ITUM. Mitigation measures are summarized in the associated chapter of the EIS referenced in the table below and commitments are outlined in Chapter 23, Commitments Made in the Environmental Impact Statement.

Table 22-6: Innu Takuaikan Uashat mak Mani-Utenam's Issues and Concerns

Topic of Interest	Issue or Concern	Summary of Issue or Concern	Where Addressed in the EIS	Raised in Alderon EIS (Yes/No)
Socioeconomic	Agreements and negotiations	ITUM indicated they are considering alternatives than the Consultation Agreement to make sure Champion is providing sufficient capacity for ITUM's engagement related to the Project.	– Chapter 22: Engagement Champion is committed to continued engagement with ITUM throughout the Project phases. Champion will continue discussions with ITUM on providing sufficient capacity for engagement.	No
	Regional infrastructure and services	ITUM expressed interest in integrating a wind project to supply the sector with electricity.	– Chapter 15: Economy and Employment	No

Topic of Interest	Issue or Concern	Summary of Issue or Concern	Where Addressed in the EIS	Raised in Alderon EIS (Yes/No)
			– Chapter 16: Services and Infrastructure – Chapter 17: Community Health and Well-being	
	Regional infrastructure and services	ITUM expressed interest in increasing the reach of the Tshiuetin rail transport company for mineral transportation.	– Chapter 15: Economy and Employment – Chapter 16: Services and Infrastructure – Chapter 17: Community Health and Well-being	No
	Engagement processes	ITUM showed interest in including the families impacted by the Project in engagement and would assist in identifying families to be engaged.	– Chapter 17: Community Health and Well-being	No
	Engagement processes	ITUM stated they reject NCC's claims to Indigenous identity and expressed their opposition to Champion engaging with NCC on the Project.	– Chapter 22: Engagement – Champion acknowledges this feedback. Champion is committed to following the Duty to Consult requirements as outlined by the NL Office of Indigenous Affairs and Reconciliation.	No
	Engagement processes	ITUM stated they would not disclose confidential land use data.	– Chapter 22: Engagement – The sensitivity of confidential land use data is acknowledged. Champion encourages sharing of any non-confidential information in the future, through continuation of the relationship between Champion and ITUM.	No
	Land use	ITUM expressed that lands around the Project area has been greatly affected by mining activities over the decades, which has had an important effect on caribou migration in the region. Nevertheless, ITUM stated they still use the land near the Project area for hunting and trapping purposes.	– Chapter 11: Wildlife – Chapter 13: Indigenous Land and Resource Use	Yes
	EIS submission	ITUM provided Champion with feedback on the pre-EIS submission by stating that the community presentation and land use that was presented in the previous EIS (Alderon) was not adequate. Champion proposed to use the wording from the 2019 Bloom Lake EIS instead.	– Chapter 13: Indigenous Land and Resource Use	No
	Workforce and employment	ITUM is in favour of FIFO to provide employment opportunities to their community members.	– Chapter 15: Economy and Employment – Chapter 17: Community Health and Well-being	No

Topic of Interest	Issue or Concern	Summary of Issue or Concern	Where Addressed in the EIS	Raised in Alderon EIS (Yes/No)
Environmental	Water quality	ITUM showed interest in the rivers and streams on the Project property.	– Chapter 8: Surface Water	No
	Dust	ITUM showed concern about the accumulation of mine rock stockpiles as this creates dust in the surrounding area.	– Chapter 5: Air Quality and Climate	No
	Environment	ITUM showed interest in an environmental evaluation report.	– Chapter 5: Air Quality and Climate – Chapter 7: Groundwater – Chapter 8: Surface Water – Chapter 9: Fish and Fish Habitat – Chapter 10: Vegetation and Wetlands – Chapter 11: Wildlife	No

EIS = environmental impact statement; ITUM = Innu Takuaikan Uashat mak Mani-Utenam; NCC = NunatuKavut Community Council; NL = Newfoundland and Labrador; FIFO = fly-in fly-out.

22.3.3 La Nation Innu Matimekush-Lac John

NIMLJ is an Innu First Nation community located in the vicinity of the Town of Schefferville, Québec, approximately 220 km north of the Project site. NIMLJ has two reserve parcels, Matimekush (Matimekosh 3) (in the centre of Schefferville) and Lac-John (north of Schefferville) (CIRNAC 2025d). Schefferville, and the two NIMLJ reserves, are not connected to the provincial road network, and are instead accessible by air or rail (Tourism Cote-Nord 2025). The total registered population is 1,059 (CIRNAC 2025e). Additional information about NIMLJ is provided in Annex 4C.

22.3.3.1 Engagement Activities

On October 16, 2023, Champion provided NIMLJ with a Project introduction letter to notify NIMLJ about the Project. Champion and NIMLJ first met on January 24, 2024, to discuss the Project. To date, they have addressed key topics, including engagement processes and preferences, capacity building, workforce and employment, as well as well-being of youth and other community benefits. Discussion has also focused on identifying and addressing potential concerns raised by NIMLJ regarding the Project. Efforts are ongoing to establish a proposed Consultation Agreement to support continued collaboration.

Table 22-7 provides a summary of key engagement activities undertaken with NIMLJ between Project initiation on November 22, 2022, and April 11, 2025.

Table 22-7: La Nation Innu Matimekush-Lac John–Key Engagement Activities

Date	Activity	Summary
October 16, 2023	Letter	Champion provided NIMLJ with a Project introduction letter and offered to arrange a meeting to discuss the Project.
November 29, 2023	Letter	Champion provided NIMLJ with a Project introduction letter and offered to arrange a meeting to discuss the Project.
January 24, 2024	Meeting (virtual)	Champion and NIMLJ met to discuss training, employment, well-being of youth, and other benefits to community. Champion provided an update on the Project economics, timeline of activities, and mining components; and identified challenges. The strategy and vision were presented. Similarities and optimizations of the Project were compared to the previous project from Alderon in 2012.
May 29, 2024	Meeting (virtual)	Champion and NIMLJ met to discuss the Project and the Project Registration submission and began discussions regarding a potential Consultation Agreement for the EIS and the permitting requirements for the winter advanced exploration campaign.

Date	Activity	Summary
June 6, 2024	Email	Following the submission of the Project Registration, Champion followed up to make sure NIMLJ had the necessary information to review the Project Registration document and offered the opportunity to provide more information or hold a meeting with them to answer their questions.
September 3, 2024	Email	Champion provided NIMLJ with a Consultation and Engagement Compliance Agreement and invited NIMLJ to provide feedback on the agreement by September 20, 2024.
November 28, 2024	Meeting (virtual)	Champion and NIMLJ met to discuss the Project and the participation process for the EIS submission.
December 19, 2024	Meeting (virtual)	Champion met with NIMLJ to discuss its consultation process and continued collaboration.
February 19, 2025	Phone call	Champion and NIMLJ representative discussed the Project timeline, the Consultation Agreement, and continued collaboration.
March 7, 2025	Phone call	Champion and NIMLJ representative discussed the Project timeline, the Consultation Agreement, and continued collaboration.
April 11, 2025	E-mail	An EIS pre-submission package was shared with all Indigenous groups for collaboration, comments and improvement. The submission included the following elements: Project overview and schedule, approach to engagement, overview of engagements, up to date and topics of interest, socioeconomic profile and a copy of the Traditional land use from the previous (Alderon) EIS.

NIMLJ = La Nation Innu Matimekush-Lac John; EIS = environmental impact statement.

22.3.3.2 Topics of Interest, Issues, and Concerns

NIMLJ raised concerns and identified issues regarding the engagement process.

Table 22-8 outlines the EIS chapters the issues and concerns raised by NIMLJ. Mitigation measures are summarized in the associated chapter of the EIS referenced in the table below and commitments are outlined in Chapter 23, Commitments Made in the Environmental Impact Statement.

Table 22-8: La Nation Innu Matimekush-Lac John's Issues and Concerns

Topic of Interest	Issue or Concern	Summary of Issue or Concern	Where Addressed in the EIS	Raised in Alderon EIS (Yes/No)
Socioeconomic	Engagement processes	NIMLJ considered that the Government of NL had failed in its obligations regarding consultation and engagement with the First Nations by delegating the allocation of funds for Project review to the mining promoter. This places the nation in an uncomfortable position vis-à-vis the promoter.	– Chapter 22: Engagement Champion is completing engagement activities under the NL Aboriginal Consultation Policy (April 2013), and while NL has delegated some of the procedural aspects of consultation, NL may perform further consultation activities.	No
		NIMLJ emphasized their intention to retain autonomy throughout the consultation process while working in close collaboration with ITUM on joint responses on the Project when both entities are aligned on their position.	– Chapter 22: Engagement Champion will continue to work with NIMLJ throughout the Project and will continue to engage with NIMLJ based on the Kami Engagement Plan (Annex 5G).	Yes

Topic of Interest	Issue or Concern	Summary of Issue or Concern	Where Addressed in the EIS	Raised in Alderon EIS (Yes/No)
	Engagement processes	NIMLJ stated they reject NCC's claims to Indigenous identity and expressed their opposition to Champion engaging with NCC on the Project.	– Chapter 22: Engagement Champion acknowledges this feedback. Champion is committed to following the Duty to Consult requirements as outlined by the NL Office of Indigenous Affairs and Reconciliation.	No
	Workforce and employment	NIMLJ is in favour of FIFO to provide employment opportunities to their community members.	– Chapter 15: Economy and Employment – Chapter 17: Community Health and Well-being	No
	Land use	NIMLJ explained to Champion the close historical relationship between Innu families from different communities such as NIMLJ, ITUM and Innu Nation.	– Champion welcomes the feedback from NIMLJ and will integrate information learned as it progresses with the Project.	No
Environmental	Environmental protection	NIMLJ stated that mining companies had, and continue to have, an impact on their Traditional land. They would like Champion to enforce environmental protection measures to mitigate the effects of the Project.	– Chapter 5: Air Quality and Climate – Chapter 7: Groundwater – Chapter 8: Surface Water – Chapter 9: Fish and Fish Habitat – Chapter 10: Vegetation and Wetlands – Chapter 11: Wildlife Throughout its engagement efforts in 2024, Champion discussed with all identified Indigenous groups if there was any new information to be integrated into the Kami Mining Project regarding the location of the Kami Mining Project or the land use.	Yes

EIS = environmental impact statement; NIMLJ = La Nation Innu Matimekush-Lac John; NL = Newfoundland and Labrador; ITUM = Innu Takuaikan Uashat mak Mani-Utenam; NCC = NunatuKavut Community Council; FIFO = fly-in fly-out.

22.3.4 Naskapi Nation of Kawawachikamach

NNK is a First Nations band located in the vicinity of the Town of Schefferville, Québec. NNK's reserve parcel, Kawawachikamach, is located in the vicinity of the Town of Schefferville, Québec. Schefferville, and Kawawachikamach reserve, is not connected to the provincial road network, and is instead accessible by air or rail (CIRNAC 2025f). According to the Crown-Indigenous Relations and Northern Affairs Canada Nation profile, 86.3% of NNK community members live on reserve. The total registered population for the NNK as of July 2023 is 824 of which 86.3% of NNK members live on reserve (CIRNAC 2025g). Additional information about NNK is provided in Annex 4C.

22.3.4.1 Engagement Activities

On October 16, 2023, Champion provided NNK with a Project introduction letter to notify NNK about the Project. Champion and NNK first met on January 29, 2024, to discuss the Project. To date, they have addressed key topics, including engagement processes and preferences, as well as permitting processes. Discussion has also focused on identifying and addressing potential concerns raised by NNK regarding the Project. Efforts are ongoing to establish a proposed Consultation Agreement to support continued collaboration.

Table 22-9 provides a summary of key engagement activities undertaken with NNK between Project initiation on November 22, 2022, and April 11, 2025.

Table 22-9: Naskapi Nation of Kawawachikamach–Key Engagement Activities

Date	Activity	Summary
October 16, 2023	Letter	Champion provided NNK with a Project introduction letter and offered to arrange a meeting to discuss the Project.
January 29, 2024	Meeting (virtual)	Champion met with Atmacinta Inc. (on behalf of NNK) to discuss engagement process and organizing an introduction meeting. The Naskapi Mining Engagement policy was noted as being a document to assist in preparing a pre-development engagement.
February 9, 2024	Meeting (in person)	Champion and NNK met to discuss the Project, the permitting process, and a potential Consultation Agreement. Project economics, timeline of activities, mining components, identified challenges, and strategy and vision were presented. Similarities and optimizations of the Project were compared to the previous project from Alderon in 2012.
May 29, 2024	Meeting (virtual)	Champion met with NNK to discuss the Project Registration, Traditional land use and the consultation process.
June 6, 2024	Email	Following the submission of the Project Registration, Champion followed up to make sure NNK had the necessary information to review the Project Registration document and offered the opportunity to provide more information or hold a meeting with them to answer their questions.
September 3, 2024	Email	Champion provided NNK with a Consultation and Engagement Compliance Agreement and NNK was invited to provide feedback on the agreement by September 20, 2024.
November 18, 2024	Meeting (virtual)	Champion and NNK met to discuss the consultation and participation process, as well as the draft EIS, prior to its submission to the minister.
January 16, 2025	Meeting (virtual)	Champion and NNK met to discuss the draft Consultation process and the participation process for the draft EIS revision prior to submission to the minister.
April 11, 2025	E-mail	An EIS pre-submission package was shared with all Indigenous groups for collaboration, comments and improvement. The submission included the following elements: Project overview and schedule, approach to engagement, overview of engagements, up to date and topics of interest, socioeconomic profile and a copy of the Traditional land use from the previous (Alderon) EIS.

EIS = environmental impact statement; NNK = Naskapi Nation of Kawawachikamach.

22.3.4.2 Topics of Interest, Issues, and Concerns

NNK has expressed interest in establishing a Consultation Agreement and potential opportunities with Champion. NNK also expressed support for a Fly-In Fly-Out (FIFO) staffing model which would create employment opportunities for community members at the Project site. NNK raised concerns and identified issues regarding the engagement process.

Table 22-10 outlines the EIS chapters which address the issues and concerns raised by NNK. Mitigation measures are summarized in the associated chapter of the EIS referenced in the table below and commitments are outlined in Chapter 23, Commitments Made in the Environmental Impact Statement.

Table 22-10: Naskapi Nation of Kawawachikamach's Issues and Concerns

Topic of Interest	Issue or Concern	Summary of Issue or Concern	Where Addressed in the EIS	Raised in Alderon EIS (Yes/No)
Socioeconomic	Agreements and negotiations	NNK showed interest in potential opportunities with Champion.	– Chapter 15: Economy and Employment – Chapter 17: Community Health and Well-being	Yes
	Engagement processes	NNK requested the establishment of a Consultation Agreement to guide the consultation process.	– Chapter 22: Engagement Champion presented all Indigenous groups with Consultation Agreement for the revision which include financial provisions to participate in the current EIS, as per the NL Aboriginal Consultation Policy (April 2013).	Yes
	Land use	NNK have expressed the importance of recognizing the Traditional land of the Naskapis within Labrador West.	– Champion proposed a consultation agreement to NNK and is waiting for feedback.	Yes
Environmental	Environmental protection	NNK stated that mining companies had, and continue to have, an impact on their Traditional land. They would like Champion to enforce environmental protection measures to mitigate the effects of the Project.	– Chapter 5: Air Quality and Climate – Chapter 7: Groundwater – Chapter 8: Surface Water – Chapter 9: Fish and Fish Habitat – Chapter 11: Wildlife	Yes

EIS = environmental impact statement; NNK = Naskapi Nation of Kawawachikamach; NL = Newfoundland and Labrador.

22.3.5 NunatuKavut Community Council

NCC has approximately 6,000 members, living in six NCC regions in NL: Straits (Area 1), Battle Harbour (Area 2), Bolsters Rock to Spear Point (Area 3), Sandwich Island/Island of Ponds (Area 4), Central/Northern Labrador (Area 5), and Western Labrador (Area 6, which includes the Project-local-study-area municipalities of Labrador City and Wabush); NCC members living outside Labrador are represented by Area 7 (Nunatukavut Community Council 2025). Additional information about NCC is provided in Annex 4C.

22.3.5.1 Engagement Activities

On December 22, 2023, Champion provided NCC with a Project introduction letter to notify NCC about the Project. Champion and NCC first met on February 14, 2024, to discuss the Project. To date, they have held two additional meetings to address key topics, including engagement processes and preferences, the feasibility study, the EIS process, and the cabin owner compensation program. Discussion has also focused on identifying and addressing potential concerns raised by NCC regarding the Project. Champion also issued a consultation agreement to meet the province's Consultation Policy on Land and Resource Development Decisions.

Table 22-11 provides a summary of key engagement activities undertaken with NNK between Project initiation on November 22, 2022, and April 11, 2025.

Table 22-11: NunatuKavut Community Council–Key Engagement Activities

Date	Activity	Summary
December 22, 2023	Letter	Champion provided NCC with a Project introduction letter and offered to arrange a meeting to discuss the Project.
February 14, 2024	Meeting (virtual)	Champion and NCC met to discuss the Project. Project economics, timeline of activities, mining components, identified challenges and strategy and vision were presented. Similarities and optimizations of the Project were compared to the previous project from Alderon in 2012, covering financial highlights, timeline, mining components, optimizations, permitting, and challenges.
May 29, 2024	Meeting (virtual)	Champion and NCC met to discuss the Project Registration and the consultation process.
June 6, 2024	Email	Following the submission of the Project Registration, Champion followed up to make sure NCC had the necessary information to review the Project Registration document and offered the opportunity to provide more information or hold a meeting with them to answer their questions.
September 3, 2024	Email	Champion provided NCC with a Consultation Agreement and invited NCC to provide feedback by September 20, 2024.
September 11, 2024	Email	Champion requested to meet with NCC to discuss the Project and the Consultation Agreement. NCC replied, providing the signed Consultation Agreement and availability for a meeting.
October 17, 2024	Meeting (in person)	Champion and NCC met to discuss Project mitigations, the feasibility study, the EIS process, and the cabin owner compensation program. NCC provided feedback on the Atlantic salmon St. Lewis River enhancement.
November 5, 2024	Email	Champion provided NCC with a table summarizing forecasted drilling activities (including permit application submission and expected approval dates), for review.
April 11, 2025	E-mail	An EIS pre-submission package was shared with all Indigenous groups for collaboration, comments and improvement. The submission included the following elements: Project overview and schedule, approach to engagement, overview of engagements, up to date and topics of interest, socioeconomic profile and a copy of the Traditional land use from the previous (Alderon) EIS.

NCC = NunatuKavut Community Council; EIS = environmental impact statement.

22.3.5.2 Topics of Interest, Issues, and Concerns

NCC expressed interest in potential opportunities with Champion. NCC expressed support for a FIFO staffing model, recognizing that it could create employment opportunities for NCC community members at the mine site. NCC raised concerns and identified issues regarding cumulative effects on fish and fish habitat wildlife and wildlife habitat, and agreements and negotiations.

Table 22-12 outlines the EIS chapters that address the issues and concerns raised by NCC. Mitigation measures are summarized in the associated chapter of the EIS referenced in the table below and commitments are outlined in Chapter 23, Commitments Made in the Environmental Impact Statement.

Table 22-12: NunatuKavut Community Council's Issues and Concerns

Topic of Interest	Issue or Concern	Summary of Issue or Concern	Where Addressed in the EIS	Raised in Alderon EIS (Yes/No)
Environmental	Fish and Fish Habitat	NCC addressed concerns about the Atlantic salmon St. Lewis River enhancement, as Elders have already been consulted and would not recommend opening up new areas of the river where salmon had never reached before. This would go against the natural course of the river.	– Chapter 9: Fish and Fish Habitat – TSD IX: Fish and Fish Habitat Offsetting Plan	No
	Wildlife and Wildlife Habitat	NCC expressed historical concerns about potential impacts on birds and their habitat.	– Chapter 11: Wildlife	Yes
Socioeconomic	Agreements and Negotiations	NCC showed interest in potential opportunities with Champion.	– Chapter 15: Economy and Employment – Chapter 17: Community Health and Well-being	Yes
	Availability of Electricity	NCC expressed concerns about NL Hydro's project to bring electricity to Labrador West as it will compete with coastal communities who are in desperate need of power.	– Chapter 16: Services and Infrastructure	No
	Land use	NCC expressed their desire to update the land use study that was produced in the previous EIS (Alderon) for the current EIS submission.	– Champion has submitted the pre-consultation package to NCC and is awaiting feedback.	No

EIS = environmental impact statement; NCC = NunatuKavut Community Council; TSD = technical support document; NL = Newfoundland and Labrador.

22.4 Public Stakeholders

The term "stakeholder" refers to a broad range of interested and potentially affected individuals and groups, including local government organizations, communities, businesses, non-governmental organizations, public interest groups, and clubs. Indigenous Peoples are Rightsholders rather than stakeholders, as Indigenous Peoples hold Indigenous rights protected under Section 35 of the *Constitution Act, 1982*. In the context of this Project, a stakeholder may be any person or group of people who have an interest to protect, who have a stake in the issue, or who have knowledge to contribute. This includes a person or group who would be directly affected by the Project and a person or group with more general or varying degrees of concern, interest, and desire to engage with issues related to the Project.

Stakeholders for the Kami Mining Project have been identified based on previous experience and information acquired from Champion, as well as from a review of available secondary information. Champion identified interested stakeholders using the following criteria:

- proximity of persons or groups that reside, have property, or have an interest within or near the proposed Project area, or could be potentially affected due to proximity from the proposed Project area
- past or current interest of persons or groups in the Project, or similar projects or developments in the vicinity of the Project
- persons or groups not located close to the Project area, but who could potentially be affected by the outcomes of the Project

As documented in the Alderon (2012) EIS, previous engagement with the following stakeholders took place:

- local stakeholders, including residents of the communities of the Town of Labrador City, Town of Wabush, and the Town of Fermont
- other potentially impacted or interested stakeholders beyond these boundaries, including provincial and federal government agencies and departments, non-governmental organizations, economic development organizations, and outdoor recreation users and outfitters

Table 22-13Table 22-13 provides the preliminary list of stakeholders identified for the Project. Additional stakeholders may be identified through planned engagement activities.

Table 22-13: Stakeholder Groups

Category	Stakeholder
Municipal governments	Wabush
	Labrador City
	Fermont
Cabin owners and cabin owners associations	Duley Lake Cabin Owners Association
	Mills Lake Cabin Owners Association
	Riordan Lake Cabin Owners Association
	Québec cabin owners
Local economic development	Centre local de développement de Caniapiscau
	Conseil de développement économique d'Uashat mak Mani-Utenam
	Labrador West Chamber of Commerce
	Labrador West Employment Corporation
	Labrador West Tourism Corporation
	Newfoundland and Labrador Organization of Women Entrepreneurs
	Town of Labrador City Economic Development Department
	Women in Resource Development Corporation
Local environment interest groups	Conseil régional de l'environnement de la Côte-Nord
Local education, social services, and health services	College of the North Atlantic
	Centre de santé et services sociaux de L'Hématite
	Labrador-Grenfell Health
	Labrador Institute of Memorial University, Labrador Campus
	Labrador West Status of Women
	Labrador Friendship Centre
	Newfoundland and Labrador English School District
	Conseil scolaire francophone provincial de Terre-Neuve et Labrador
	Newfoundland and Labrador Housing Corporation
	Provincial Advisory Council on the Status of Women
	Royal Newfoundland Constabulary
Outfitters and recreation	Duley Lake Family Park
	Newfoundland and Labrador Outfitters Association
	White Wolf Snowmobile Club
	Menihek Nordic Ski Club
	Smokey Mountain Ski Lodge
	Tamarack Golf Course
Non-profit organizations	Labrador West Alliance
	Heritage Foundation of Newfoundland and Labrador

22.4.1 Labrador City

The Town of Labrador City is situated near the Québec border in western Labrador on the shoreline of Little Wabush Lake. Labrador City is the second-largest population centre in Labrador with a population of 7,412 in 2021, a 2.7% increase from 2016 (Statistics Canada 2023). The Project is located approximately 10 km southwest from Labrador City. Additional information about Labrador City is provided in Annex 4C.

22.4.1.1 Engagement Activities

Champion held seven meetings with Labrador City representatives from April 2023 to January 2025. Engagement commenced with an introductory virtual meeting followed by in-person meetings to discuss the pre-feasibility study, Project Registration, the visual effects model and mitigation measures. Topics of concern raised through subsequent meetings include workforce needs, municipal development, senior housing, community benefits including the cabin owner's compensation program. Common items of interest include Project updates, economics, challenges and vision, and Project optimizations undertaken since the Alderon EIS. Follow-up engagement activities have included providing memos, meeting notes, and copies of presentation files via email to Labrador City representatives.

Table 22-14 provides a summary of key engagement activities undertaken with Labrador City between Project initiation on November 22, 2022, and March 31, 2025.

Table 22-14: Labrador City–Key Engagement Activities

Date	Activity	Summary
April 26, 2023	Meeting (virtual)	Champion met with mayors from Labrador City and Wabush to discuss the Project. Subjects such as workforce requirements, town development, senior housing and community benefits were discussed.
December 4, 2023	Meeting (in person)	Champion met with the Town to discuss the Project and emphasized the ongoing exploration campaign, preferred consultation process, and permit requirements.
January 23, 2024	Memo	Champion provided a written update on the ongoing exploration campaign and provided a map of the work.
February 13, 2024	Meeting (in person)	Champion met with the Town to present the Project. Project economics, timeline of activities, mining components, identified challenges and strategy and vision were presented. Similarities and optimizations of the Project were compared to the previous project from Alderon in 2012. The Town introduced the stewardship agreement that was elaborated on with Alderon. The Town also identified that water bombers use Duley Lake to collect water for forest fires. Champion proposed to regroup some local stakeholders which are likely to be impacted by the Project to form a Regional Working Group.
May 2, 2024	Email	Champion informed the Town that the Project Registration had been submitted to NLDECC and provided a link to the NLDECC EA website where the submission could be accessed. Champion informed of the establishment of a Regional Working Group to discuss concerns and effects related to the Project. Champion expects this committee to inform the Project development and help identify issues of greatest interest to the local community and key measures to avoid or mitigate potential effects from the Project.
May 14, 2024	Meeting (in person)	Champion and Labrador City met to discuss the Project Registration and EIS, the Alderon stewardship agreement, Champion's waste management strategy, the potential FIFO staffing model, as well as planning for a public information session and the first Kami working group meeting.
October 16, 2024	Meeting (in person)	Champion and the Town met to discuss the Project. Champion provided an update on the Project, providing next steps, including public information sessions dates and format and EIS submission timeline.
December 10 and 11, 2024	Public information session	Champion presented the Project components, timeline for the upcoming stages of the Project, advanced exploration work and modelling results to the people in attendance at the public information session in Wabush.
January 28, 2025	Meeting (in person)	Champion met with Towns of Labrador City and Wabush, to discuss worker accommodations/housing and town development challenges in Labrador West.

EA = environmental assessment; EIS = environmental impact statement; FIFO = fly-in fly-out; NLDECC = Newfoundland and Labrador Department of Environment and Climate Change.

22.4.1.2 Topics of Interest, Issues, and Concerns

Labrador City expressed interest in establishing a stewardship agreement with Champion. Labrador City raised concerns and identified issues regarding agreements and negotiations, regional infrastructure and services, workforce and employment, access roads, dust, greenhouse gas emissions, and wildlife and wildlife habitat.

Table 22-15 outlines the EIS chapters that address Labrador City issues and concerns. Mitigation measures are summarized in the associated chapter of the EIS referenced in the table below and commitments are outlined in Chapter 23, Commitments Made in the Environmental Impact Statement.

Table 22-15: Labrador City's Issues and Concerns

Topic of Interest	Issue or Concern	Summary of Issue or Concern	Where Addressed in the EIS	Raised in Alderon EIS (Yes/No)
Environmental	Dust	Labrador City expressed a concern with dust in meetings and working group.	– Chapter 5: Air Quality and Climate	Yes
	Water quality	Labrador City expressed concern about water quality in relation to the way the lakes in the area were being used for multiple purposes.	– Chapter 8: Surface Water – Chapter 9: Fish and Fish Habitat	Yes
Project component	Access road	Alternative access has been expressed as a concern by Labrador City.	– Chapter 16: Services and Infrastructure	Yes
	Power	Labrador City emphasized that the region has a very high demand for power and that the electrical supply is strained.	– Chapter 16: Services and Infrastructure	No
Socioeconomic	Agreements and negotiations	Labrador City expressed interest in a stewardship agreement with Champion.	– Chapter 8: Surface Water – Chapter 9: Fish and Fish Habitat – Chapter 10: Vegetation, Wetlands and Protected Areas – Chapter 11: Wildlife – Chapter 14: Other Land and Resource Use	Yes
		Labrador City would like Champion to acknowledge the stewardship agreement that was made with Alderon, but the number provision shall reflect inflation and be adjusted to 2024 numbers.	– Chapter 8: Surface Water – Chapter 9: Fish and Fish Habitat – Chapter 10: Vegetation and Wetlands – Chapter 11: Wildlife – Chapter 14: Other Land and Resource Use	Yes
	Regional infrastructure and services	Labrador City expressed concern about the lack of land available to build homes.	– Chapter 16: Services and Infrastructure	Yes
		Labrador City expressed concern about the low availability of rental units.	– Chapter 16: Services and Infrastructure	Yes
		Labrador City expressed concern about the lack of seniors' housing.	– Chapter 16: Services and Infrastructure	No
		Labrador City expressed concerns regarding local capacity in regard to emergency response. A mutual aid-agreement is desired.	– Chapter 16: Services and Infrastructure	No

Topic of Interest	Issue or Concern	Summary of Issue or Concern	Where Addressed in the EIS	Raised in Alderon EIS (Yes/No)
	Workforce and employment	Labrador City noted that there is a lack of skilled workers available, which results in FIFO to fulfil employment needs.	– Chapter 15: Economy and Employment	Yes
		Labrador City indicated that it would rather see local people getting hired over FIFO.	– Chapter 15: Economy and Employment	Yes
		Labrador City expressed concerns with Project economics.	– Chapter 15: Economy and Employment	Yes

EIS = environmental impact statement; FIFO = fly-in-fly-out.

22.4.2 Wabush

The Town of Wabush near the Québec border in western Labrador on the shores of Jean Lake and 5 km south of Labrador City. Wabush had a population of 1,964 in 2021, a 3.0 increase from 2016 (Statistics Canada 2023). The Project is located approximately 7 km southwest of Wabush. Additional information about Wabush is provided in Annex 4C.

22.4.2.1 Engagement Activities

Champion held several meetings with Wabush representatives six times between April 2023 and January 2025. Engagement commenced with introductory virtual meeting for a Project update and a discussion regarding the available land for development, lack of seniors' housing, labour pool, FIFO and community agreements. In-person meetings followed with discussion including site plan improvements, site visit, environmental programme, and field investigations, EA registration anticipated timing, snowmobile trail changes, pre-feasibility study, visual effects model, mitigation, and the cabin owners' compensation program. Other follow-up activity included emails sent to Wabush regarding the following:

- a memo with Duley Lake Access trail information and map
- a link to the documents on the EA list from the Environment and Climate Change Canada (ECCC) website
- meeting notes and presentation

Finally, a public information session was held in December 2024, in Wabush, focussing on the Project schedule, advanced exploration work and visual modelling results.

Table 22-16 provides a summary of key engagement activities undertaken with Wabush between Project initiation on November 22, 2022, and March 31, 2025.

Table 22-16: Wabush–Key Engagement Activities

Date	Activity	Summary
April 26, 2023	Meeting (virtual)	Champion met with mayors from Labrador City and Wabush to discuss the Project. Subjects such as workforce requirements, town development, senior housing and community benefits were discussed.
October 3, 2023	Meeting (in person)	Champion met with Wabush to provide an update on the Project. Champion highlighted the site plan improvements, environmental program and field investigations and the Project Registration anticipated timing.
December 6, 2023	Meeting (in person)	Champion met with the Town to discuss the Project and emphasized on the ongoing exploration campaign, preferred consultation process and permits requirements. The Town and Champion exchanged on the importance of mining activities on the Town's annual budget.
January 23, 2024	Memo	Champion provided a written update on the ongoing exploration campaign and provided a map of the work.

Date	Activity	Summary
February 13, 2024	Meeting (in person)	Champion met with the Town to present the Project. Project economics, timeline of activities, mining components, identified challenges, and strategy and vision were presented. Similarities and optimizations of the Project were compared to the previous project from Alderon in 2012. Champion proposed to regroup some local stakeholders who are likely to be impacted by the Project to form a Regional Working Group.
May 2, 2024	Email	Champion informed Wabush that the Project Registration had been submitted to NLDECC and provided a link to the NLDECC EA website where the submission could be accessed. Champion informed of the establishment of a Regional Working Group to discuss concerns and effects related to the Project. Champion expects this committee to inform the Project development and help identify issues of greatest interest to the local community and key measures to avoid or mitigate potential effects from the Project.
May 14, 2024	Meeting (in person)	Champion and Wabush met to discuss the Project Registration, the Kami Working Group, planning for a public information session, and the winter advanced exploration campaign.
October 1, 2024	Site visit	Champion presented an overview of the Bloom Lake project and provided information on water and tailings management.
October 16, 2024	Meeting (in person)	Champion and the Town met to discuss the Project. Champion provided an update on the Project, providing next steps, including public information sessions dates and EIS submission timeline.
December 10 and 11, 2024	Public information session	Champion presented the Project components, timeline for the upcoming stages of the Project, advanced exploration work and modelling results to the people in attendance at the public information session in Wabush.
January 28, 2025	Meeting (in person)	Champion met with the Towns of Labrador City and Wabush, to discuss worker accommodations/housing and town development challenges in Labrador West.

EA = environmental assessment; EIS = environmental impact statement; NLDECC = Newfoundland and Labrador Department of Environment and Climate Change.

22.4.2.2 Topics of Interest, Issues, and Concerns

This section provides a summary of feedback received from Wabush (Table 22-17). Wabush expressed interest in potentially partnering with Champion to build a seniors' home, which would open up houses for workers. Wabush raised concerns and identified issues regarding access roads, power, regional infrastructure and services, regional and local economy, accommodations, dust, change in air quality, workforce and employment, potential effects on water quality, safety, and recreational activities and infrastructure.

Table 22-17 outlines the EIS chapters that address Wabush's issues and concerns. Mitigation measures are summarized in the associated chapter of the EIS referenced in the table below and commitments are outlined in Chapter 23, Commitments Made in the Environmental Impact Statement.

Table 22-17: Wabush's Issues and Concerns

Topic of Interest	Issue or Concern	Summary of Issue or Concern	Where Addressed in the EIS	Raised in Alderon EIS (Yes/No)
Environmental	Dust	Wabush noted a preference for a dust suppression spray as an additional mitigation measure.	– Chapter 5: Air Quality and Climate	Yes
	Air quality	Wabush expressed concerns about air quality.	– Chapter 5: Air Quality and Climate	Yes
	Water quality	Wabush discussed the rail options with respect to the proximity to the watershed area and the Wabush water intake in relation to possible diesel contamination.	– Chapter 7: Groundwater – Chapter 8: Surface Water	Yes

Topic of Interest	Issue or Concern	Summary of Issue or Concern	Where Addressed in the EIS	Raised in Alderon EIS (Yes/No)
		Wabush stated that the east access road should be reconsidered. Wabush was concerned that fuel transportation through the protected Wabush water supply should be avoided at all phases of the Project. The east access road and railway would also interfere with many existing trails going to cabins, which could cause security issues and increase the effect on land users.	– Chapter 14: Other Land and Resource Use	No
Project component	Access road	Wabush expressed concerns about signage and cabin zoning.	– Chapter 14: Other Land and Resource Use	No
		Wabush stated that the east access road should be reconsidered. Wabush was concerned that fuel transportation through the protected Wabush water supply should be avoided at all phases of the Project. The east access road and railway would also interfere with many existing trails going to cabins, which could cause security issues and increase the effect on land users.	– Chapter 14: Other Land and Resource Use	No
	Accommodations	Wabush suggested Champion consider building houses to help families settle in the region. Wabush also noted that FIFO is expensive and not sustainable for regional growth. Wabush suggested that Champion consider the ArcelorMittal's model in Fermont which provides housing to workers. Wabush suggested that Champion partner with Wabush to build a senior home, which would open up houses for workers.	– Chapter 16: Services and Infrastructure – Chapter 17: Community Health and Well-being	Yes
		Wabush noted that housing is the number one priority.	– Chapter 16: Services and Infrastructure – Chapter 17: Community Health and Well-being	Yes
		Wabush is concerned about FIFO and does not support the FIFO as a concept for their region.	– Chapter 15: Economy and Employment	Yes
		Wabush was interested in whether there would be a camp built for the Construction phase. Wabush shared that the camp should be designed in such a manner that it can easily be converted into seniors' apartments after use by the Project.	– Chapter 16: Services and Infrastructure – Chapter 17: Community Health and Well-being	No
		Wabush showed interest in Champion building houses like other mining companies. A worker camp will not be supported by the community during the Operations phase.	– Chapter 16: Services and Infrastructure – Chapter 17: Community Health and Well-being	No
		Wabush noted that housing for seniors is a priority.	– Chapter 16: Services and Infrastructure – Chapter 17: Community Health and Well-being	No
	Power	Wabush emphasized that the region has a very high demand for power and that the electrical supply is strained.	– Chapter 16: Services and Infrastructure	Yes

Topic of Interest	Issue or Concern	Summary of Issue or Concern	Where Addressed in the EIS	Raised in Alderon EIS (Yes/No)
Socioeconomic	Recreational activities and infrastructure	Wabush stated that the east access road should be reconsidered. Wabush was concerned that fuel transportation through the protected Wabush water supply should be avoided at all phases of the Project. The east access road and railway would also interfere with many existing trails going to cabins, which could cause security issues and increase the effect on land users.	– Chapter 14: Other Land and Resource Use – Chapter 16: Services and Infrastructure	Yes
		Cabin owners attending the Wabush public open house were concerned with access to cabins once the Project begins, if the current trail system is lost, will it be replaced.	– Chapter 14: Other Land and Resource Use	Yes
		Participants of the Wabush public open house noted the concern regarding the loss of land use.	– Chapter 14: Other Land and Resource Use	Yes
		Cabin ownership concerns and desire for a compensation plan.	– Chapter 14: Other Land and Resource Use	Yes
	Regional infrastructure and services	Wabush showed interest in why the proposed railroad access route to Kami was chosen back then and why Champion is still considering using it.	– Chapter 14: Other Land and Resource Use	Yes
		Wabush expressed concern about cost for building new homes which prevents from residential development in the region.	– Chapter 16: Services and Infrastructure	Yes
		Wabush expressed concern about the lack of seniors' housing.	– Chapter 16: Services and Infrastructure	No
	Safety	Wabush stated that the east access road should be reconsidered. Wabush was concerned that fuel transportation through the protected Wabush water supply should be avoided at all phases of the Project. The east access road and railway would also interfere with a lot of existing trails going to cabins which could cause security issues and increase the effect on land users.	– Chapter 14: Other Land and Resource Use	Yes
		Wabush expressed concerns regarding local capacity in regard to Emergency response.	– Chapter 16: Services and Infrastructure	
	Workforce and employment	Concerns were expressed by Fermont and Wabush regarding the current Project staffing proposal.	– Chapter 15: Economy and Employment	Yes

EIS = environmental impact statement; FIFO = fly-in fly-out.

22.4.3 Fermont

The Town of Fermont is located in northeastern Québec adjacent the NL border, approximately 30 km from the neighbouring Towns of Labrador City and Wabush. Fermont had a population of 2,256 in 2021, an 8.8 decline from 2016 (Statistics Canada 2023). Additional information about Fermont is provided in Annex 4C.

22.4.3.1 Engagement Activities

Key engagement activities with Fermont have consisted of an introductory virtual meeting about the pre-feasibility study and in-person meetings that included discussion on the following subjects:

- stages of work
- environmental management and optimizations aligned with the 2014 ministerial conditions

- the 2012 requirements of the Mouvement Citoyen de Fermont
- visual effects model
- public information session offered in December 2024
- worker accommodations/housing and town development in the Labrador West/Fermont area

Champion kept Fermont informed with email communication, providing meeting notes, invitations to meetings, a link to the Project Registration documents on the EA list from the ECCC website, and coordinating field work among other logistics.

Table 22-18 provides a summary of key engagement activities undertaken with Fermont between Project initiation on November 22, 2022, and March 31, 2025.

Table 22-18: Fermont–Key Engagement Activities

Date	Activity	Summary
December 4, 2023	Meeting (in person)	Champion and Fermont met to discuss the Project, the exploration campaign, the preferred consultation process, as well as Project permitting and power requirements.
February 13, 2024	Meeting (in person)	Champion met with Fermont to present the Project. Project economics, timeline of activities, mining components, identified challenges, and strategy and vision were presented. Similarities and optimizations of the Project were compared to the previous project from Alderon in 2012.
May 2, 2024	Email	Champion informed Fermont that the Project Registration had been submitted to NLDECC and provided a link to the NLDECC EA website where the submission could be accessed. Champion informed of the establishment of a Regional Working Group to discuss concerns and effects related to the Project. Champion expects this committee to inform the Project development and help identify issues of greatest interest to the local community and key measures to avoid or mitigate potential effects from the Project.
June 18, 2024	Meeting (in person)	Champion and the Town of Fermont held a meeting regarding the Kami Project Registration which was submitted earlier in May. Champion provided an update to the Town on the submission.
October 15, 2024	Meeting (in person)	Champion and the Town of Fermont met to discuss the Project. Champion provided an update on the Project, outlining the next steps, including the dates of public information sessions and the EIS submission timeline.
December 12, 2024	Public information session	Champion held a public information session in Fermont. Participants expressed their concerns about the Project's progress, potential environmental impacts, and how the Project could impact the community of Fermont.
December 15, 2024	Meeting (virtual)	Champion met with Municipalité Régionale de Caniapiscau and the Town of Fermont to go through the presentation offered during the public information session and give some feedback of comments received.
January 29, 2025	Meeting (in person)	Champion met with the Town to discuss worker accommodations/housing and town development challenges in Fermont.

EA = environmental assessment; NLDECC = Newfoundland and Labrador Department of Environment and Climate Change.

22.4.3.2 Topics of Interest, Issues, and Concerns

This section provides a summary of feedback received from Fermont. Fermont raised concerns and identified issues regarding air quality, dust, noise, light pollution, vibration, water quality, accommodations, power, visual aesthetics, workforce and employment, and regional infrastructure and services.

Table 22-19 outlines the EIS chapters that address the issues and concerns raised by Fermont. Mitigation measures are summarized in the associated chapter of the EIS referenced in the table below and commitments are outlined in Chapter 23, Commitments Made in the Environmental Impact Statement.

Table 22-19: Fermont's Issues and Concerns

Topic of Interest	Issue or Concern	Summary of Issue or Concern	Where Addressed in the EIS	Raised in Alderon EIS (Yes/No)
Environmental	Air quality, water quality, visual effects, noise	Fermont identified its main concerns as the following: water quality, air quality (dust), visual, and noise effects for the residents of Fermont.	– Chapter 5: Air Quality and Climate – Chapter 6: Noise, Vibration, and Light – Chapter 7: Groundwater – Chapter 8: Surface Water – Chapter 14: Other Land and Resource Use	Yes
	Dust, noise	Fermont shared concerns with the mining of the Rose Pit are related to visual effects, noise, and dust impacts for the people of Fermont.	– Chapter 5: Air Quality and Climate – Chapter 6: Noise, Vibration, and Light	No
	Dust	Effectiveness of mitigation measures to reduce impacts of dust and air quality in Fermont.	– Chapter 5: Air Quality and Climate	No
	Dust	Raised concern about dust accumulation creating brown snow that could be visible on trails or mountains near Lac Daviault and lakes at the NL border. Shared concerns that this could impact attractiveness of Fermont, which is known for nearby nature opportunities.	– Chapter 5: Air Quality and Climate	Yes
	Greenhouse gas emissions	Fermont community members raised concerns regarding commuting generated by Champion's operations, which they express may cancel out the reduction in greenhouse gas emissions caused by the high-purity iron produced by the company and sold to steelmakers.	– Chapter 5: Air Quality and Climate	No
	Light pollution	Fermont has shared concerns about light pollution and mitigation methods to reduce the concern.	– Chapter 6: Noise, Vibration, and Light	Yes
	Noise	Fermont shared that assurances for siren or horn noises would be considered in its noise model. Fermont was interested in sound mitigation measures to be integrated so that the Kami site cannot be heard from Fermont.	– Chapter 6: Noise, Vibration, and Light	Yes
	Vibration	Fermont has shared concerns about potential vibrations coming from the Project.	– Chapter 6: Noise, Vibration, and Light	Yes
	Water quality	Fermont shared a concern about Rose Pit being connected to Lac Daviault and nearby lakes, and if the Project proceeds, this could impact water level and quality of the lakes.	– Chapter 14: Other Land and Resource Use	Yes
		The main concerns for Fermont were identified and discussed as the following: water quality, air quality (dust), visual effects, and noise effects for the residents of Fermont.	– Chapter 5: Air Quality and Climate – Chapter 6: Noise, Vibration, and Light – Chapter 7: Groundwater – Chapter 8: Surface Water – Chapter 14: Other Land and Resource Use	Yes
Project component	Accommodations	Fermont was interested in the residences being built.	– Chapter 16: Services and Infrastructure	Yes
		Fermont was concerned that the Project would be 100% FIFO.	– Chapter 15: Economy and Employment	Yes

Topic of Interest	Issue or Concern	Summary of Issue or Concern	Where Addressed in the EIS	Raised in Alderon EIS (Yes/No)
	Power	Fermont shared concerns about the electricity supply.	– Chapter 16: Services and Infrastructure	No
Socioeconomic	Visual aesthetics	Fermont shared that its concern with the Rose Pit would be for minimal visual, noise, and dust impacts for the people of Fermont.	– Chapter 17: Community Health and Well-being – TSD X: Visual Aesthetics Impact Assessment	No
	Workforce and employment	Concerns were expressed by Fermont and Wabush regarding the current Project staffing proposal.	– Chapter 15: Economy and Employment	Yes
	Recreational activities and infrastructure	Vacationers from Witch, Mairesse, and other lakes have raised concerns about compensation for those who may be affected by the Project.	– Chapter 17: Community Health and Well-being	Yes
	Regional infrastructure and services	Fermont expressed concern about ore transportation over rail.	– Chapter 16: Services and Infrastructure	Yes

EIS = environmental impact statement; FIFO = fly-in-fly-out; NL = Newfoundland and Labrador.

22.4.4 Cabin Owner Associations and Cabin Owners

Champion has been responding to queries and concerns submitted by cabin owners in the Project vicinity through the Project email address since September 2023. In October 2023, Champion began distributing Project updates and notifications about upcoming fieldwork activities to cabin owners via letters and emails. Champions has also initiated engagement with three cabin owner associations that represent the cabin owners in the surrounding areas. These associations are also active participants in the Kami Working Group. A map showing the approximate location of existing cabins and their respective association is shown in Figure 22-1. Additional details about the associations are as follows:

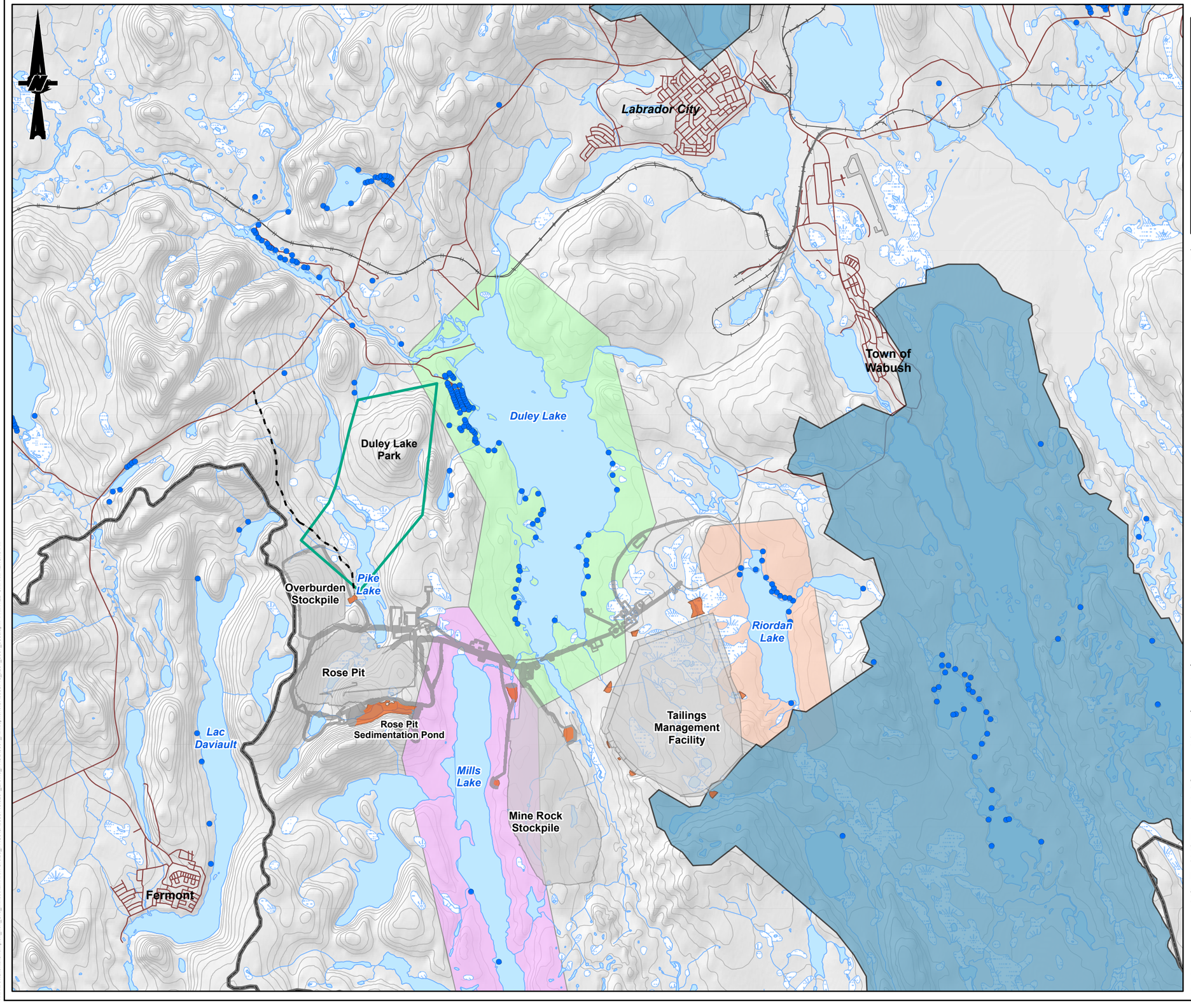
- **DLCOA** is composed of both permanent and seasonal residents and represents cabin owners with access to the Duley Lake area via Duley Lake Road, which connects to Highway 500. The current laydown area for the Kami team is located in this region.
- **MLCOA** is composed primarily of seasonal owners with access to Mills Lake via the Mills Lake trail which connects to Duley Lake Road. Cabin owners near Mills Lake are closest to the proposed Rose Pit where the majority of exploration drilling has taken place.
- **RLCOA** is composed primarily of seasonal owners with access to Riordan Lake via a trail south of the Town of Wabush. Members of this association are especially active in the Kami Working Group, given their proximity to the proposed tailings management facility.

Other cabin owners, including those near Loon Lake, Molar Lake, and other unnamed lakes in Québec, remain engaged on an individual basis depending on the level of interest they have expressed in receiving Project updates and information.

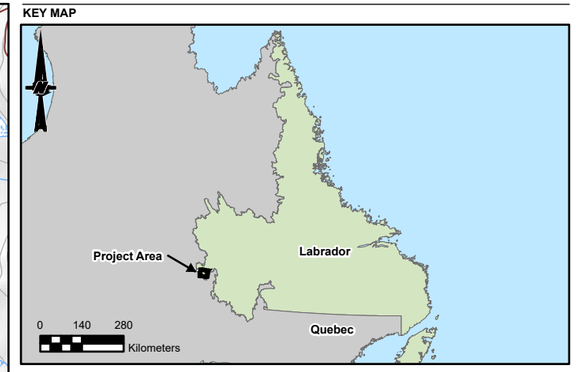
In January 2024 Champion began issuing weekly memorandums to the cabin owner associations by email, outlining upcoming fieldwork activities. Champion also engaged representatives from cabin owner associations as part of the Kami Working Group from May 2024 onwards (Section 22.4.5). In November 2024, Champion hosted information sessions for cabin owners, providing an overview of the Project, anticipated timelines, the cabin owners compensation program, and the planned advanced exploration fieldwork. Following Fermont's public information session in December 2024, Champion also began engaging with cabin owners located in Québec.

Champion continues to engage with the cabin owner associations through the Kami Working Group and maintain one-on-one communication with individual cabin owners as appropriate.

The following sections summarize Project-specific engagement activities and feedback with cabin owners and cabin owner associations conducted to date. Concerns raised by the cabin owner associations have been marked as "No" in the "Raised in Alderon EA" column, as these associations were not established during the previous Alderon EA process.



KEY MAP



SCALE 1:20,000,000

Legend

PROJECT DATA

- Proposed Project Infrastructure
- Proposed Sediment Pond
- Potential Access Road
- Cabin

APPROXIMATE CABIN ASSOCIATION AREA

- Duley Lake Cabin Owners Association
- Mills Lake Cabin Owners Association
- Riordan Lake Cabin Owners Association

BASEMAP INFORMATION

- Road
- Railway
- Watercourse
- Contour
- Duley Lake Park
- Bog/Wetland
- Waterbody
- Labrador/Quebec Boundary
- Public Water Supply

0 1,000 2,000 4,000

1:80,000 METRES

NOTE(S)

1. ALL LOCATIONS ARE APPROXIMATE

REFERENCE(S)

1. CONTAINS INFORMATION LICENSED UNDER THE OPEN GOVERNMENT LICENCE - ONTARIO
2. IMAGERY CREDITS:
3. COORDINATE SYSTEM: NAD 1983 UTM ZONE 19N

CLIENT

CHAMPION IRON MINES LTD.

PROJECT

KAMI IRON ORE MINE PROJECT (KAMI PROJECT)
WABUSH, NL

TITLE

LOCATIONS OF CABIN OWNERS AND CABIN OWNER ASSOCIATIONS

CONSULTANT

Kami

YYYY-MM-DD	2025-06-26
DESIGNED	----
PREPARED	GM
REVIEWED	PM
APPROVED	KB

PROJECT NO.	CONTROL	REV.	FIGURE
CA0038713.5261	0001	0	22-1

22.4.4.1 Engagement Activities

Champion held nine meetings and one site visit with cabin owners or cabin owner associations between December 5, 2023 and March 31, 2025. Discussions included Project and field updates, trail revitalization work, alternative site access options, and information about the establishment of a Regional Working Group to discuss concerns and effects of the Project as well as potential mitigation measures.

Table 22-20: Cabin Owner Associations–Key Engagement Activities

Date	Cabin Owner Association or Cabin Owner Location	Activity	Summary
October 20, 2023	MLCOA member	Email and Letter	Champion provided an update letter that was sent to cabin owners regarding the short drilling program to understand groundwater flow to a Mills Lake cabin owner.
October 21, 2023	MLCOA member	Email	A cabin owner provided their contact information to discuss concerns about the drilling program.
October 31, 2023	MLCOA member	Email and voicemail	Champion followed up with a cabin owner to respond to issues that were raised over email.
November 11, 2023	DLCOA	Text	The DLCOA texted Champion regarding people upset that the Mills Lake trail was blocked. The MLCOA posted the notice provided; however, it was not clear that cabin owners would not be allowed access to their cabins. Champion clarified that the cones and red tape were safety measures and could be moved to access cabins.
November 13, 2023	MLCOA member	Phone	A cabin owner returned Champion's call to provide details for an incident that occurred on October 9, 2023. Champion apologized for the incident and provided the latest safety measures. The cabin owner requested an email distribution list for notifications to cabin owners regarding heavy equipment on the trail that is the only access road to the cabins. Contact information was exchanged.
November 16, 2023	DLCOA member	Text and phone	A DLCOA cabin owner requested a meeting, provided a Facebook excerpt and had a phone call with Champion on November 16, 2023. Champion answered questions regarding the trail and offered a meeting with the DLCOA.
December 5, 2023	DLCOA	Meeting (in person)	Champion and DLCOA met to discuss the 2024 field campaign.
January 29, 2024	DLCOA	Phone	DLCOA called Champion to note that there is growing concern among cabin owners with traffic safety on Duley Lake Road. DLCOA asked some questions about the drilling program and brought up a compensation request to share snow clearing and maintenance costs.
February 13, 2024	DLCOA	Meeting (in person)	Duley Lake residents expressed concerns regarding the Kami site access and current laydown. Champion and the DLCOA discussed field campaign access and movement alternatives to mitigate impacts on residents.
February 27, 2024	DLCOA	Meeting (in person)	Champion met with the Duley Lake residents to update them on current field work and to provide more visibility on upcoming field work which would take place until June 2025. Discussions on alternative site access completion and a compensation contribution for the Duley Lake road repair and trail revitalization work continued.
April 25, 2024	MLCOA member	Email	A cabin owner asked for clarification from Champion regarding the use of Mills Lake Road and its grooming. The same day, Champion replied that the MLCOA will be included and have a response regarding their question.

Date	Cabin Owner Association or Cabin Owner Location	Activity	Summary
May 2, 2024	DLCOA	Email	Champion informed DLCOA that the Project Registration had been submitted to NLDECC and provided a link to the NLDECC EA website where the submission could be accessed. Champion informed of the establishment of a Regional Working Group to discuss concerns and effects related to the Project. Champion expects this committee to inform the Project development and help identify issues of greatest interest to the local community and key measures to avoid or mitigate potential effects from the Project.
May 2, 2024	MLCOA	Email	Champion informed MLCOA that the Project Registration had been submitted to NLDECC and provided a link to the NLDECC EA website where the submission could be accessed. Champion informed of the establishment of a Regional Working Group to discuss concerns and effects related to the Project. Champion expects this committee to inform the Project development and help identify issues of greatest interest to the local community and key measures to avoid or mitigate potential effects from the Project.
May 7, 2024	MLCOA member	Email	Champion responded to a May 4, 2024, email by providing a map displaying the route used for the environmental drilling campaign, and to be used for further pre-construction environmental review and testing. Champion further noted that should the Project receive a positive investment decision, a new road will be constructed to access the site for construction and operations.
June 17, 2024	MLCOA	Email	MLCOA informed Champion about Mills trail repairs they would like to be performed to compensate from exploration campaign's equipment movements on the trail.
June 19, 2024	DLCOA	Meeting (in person)	DLCOA met with Champion near Duley Lake to discuss the trail revitalization work.
June 22, 2024	DLCOA	Email	Champion informed the DLCOA of the completion of the trail revitalization and enhancement operation. The completed work included removal of wood material, path revitalization, path edge cleanup and tree planting.
July 12, 2024	MLCOA	Email	MLCOA met with Champion near Mille Lake to discuss the trail revitalization work.
August 5, 2024	RLCOA; MLCOA; DLCOA	Email	Champion informed the RLCOA, MLCOA and DLCOA that they would send a sound technician to take measurements at certain locations. Given there are several cabins in the area, Champion indicated that they wanted to identify those cabin owners and ask for their permission.
September 12, 2024	MLCOA	Email	MLCOA requested a meeting with Champion due to concerns regarding the potential loss of their cabins and noted that meetings between individual cabin owners and Champion would be expected to help to ensure the privacy of any negotiations.
September 17, 2024	MLCOA	Email and phone	Champion informed the cabin owner that the work to enhance the Mills Lake trail was completed by a local company.
October 1, 2024	RLCOA	Site visit	Champion proposed a site visit of the Bloom Lake project and proposed an overview of the operation. Champion provided information on water and tailings management.

Date	Cabin Owner Association or Cabin Owner Location	Activity	Summary
October 7, 2024	MLCOA member	Phone	Champion informed a cabin owner that Champion had worked with Iron City services to enhance Mills Lake trail and that Iron City services confirmed that improvements had been made. Champion also informed the cabin owner that Champion was not able to complete a section of the trail due to natural erosion and Iron City services confirmed that no changes were required for that section.
November 14, 2024	DLCOA	Email	Champion requested that DLCOA provide the contact information, if available, for the owners of two cabins to notify them about ongoing exploration activities occurring in close proximity to their properties.
November 19 and 20, 2024	DLCOA	Meeting (in person)	Champion held a special information session for all cabin owners around the Kami Mining Project. Residents from Duley Lake, Kelly's Pond, Riordan Lake, Mills Lake, Loon Lake, and Molar Lake participated.
November 19 and 20, 2024	MLCOA	Meeting (in person)	Champion held an information session for all cabin owners around the Kami Mining Project. Residents from Duley Lake, Kelly's Pond, Riordan Lake, Mills Lake, Loon Lake, and Molar Lake participated.
November 19 and 20, 2024	RLCOA	Meeting (in person)	Champion held an information session for all cabin owners around the Kami Mining Project. Residents from Duley Lake, Kelly's Pond, Riordan Lake, Mills Lake, Loon Lake, and Molar Lake participated.
November 26, 2024	DLCOA	Email	Champion invited cabin owners associations to a public Project information session scheduled for December 10 and 11, 2024, in the Town of Wabush, and encouraged them to share the invitation within their networks and across their communication platforms.
November 26, 2024	RLCOA	Email	Champion invited cabin owners associations to a public Project information session scheduled for December 10 and 11, 2024, in the Town of Wabush, and encouraged them to share the invitation within their networks and across their communication platforms.
November 26, 2024	MLCOA	Email	Champion invited cabin owners associations to a public Project information session scheduled for December 10 and 11, 2024, in the Town of Wabush, and encouraged them to share the invitation within their networks and across their communication platforms.
November 29, 2024	DLCOA; MLCOA; RLCOA	Email	Champion provided DLCOA, MLCOA, and RLCOA with the November 19 and 20, 2024, cabin owners information session meeting notes and presentation slides for review.
December 11, 2024	Cabin owner	Email	Champion provided a cabin owner with the November 19 and 20, 2024, cabin owners information session meeting notes and presentation slides.
February 14, 2025	Cabin owner	Email	A cabin owner inquired with Champion about the availability of wood for pickup.
February 19, 2025	Cabin owner	Email	Champion informed a cabin owner that wood logs are offered on an ad-hoc basis depending on maintenance and clearing work. Availability updates would be communicated through weekly communications, local partners, cabin owner representatives, and social media pages.
February 19, 2025	Cabin owner	Email	A cabin owner inquired with Champion about the movement of equipment along Elephant Head and Loon Lake roads, asking if

Date	Cabin Owner Association or Cabin Owner Location	Activity	Summary
			it was a one-time move or recurring, and whether the roads would be plowed. The cabin owner also inquired whether cabin owners at Loon Lake were notified.
February 20, 2025	Cabin owner	Email	Champion provided a cabin owner with a map and information on equipment movement along Elephant Head and Loon Lake roads, requesting that they share it with other cabin owners in the area. Champion also added the cabin owner to the weekly fieldwork updates mailing list and directed them to Champion's social media for additional fieldwork information. The cabin owner replied, expressing concerns about the accessibility and safety of the trails around Loon Lake.
March 18, 2025	DLCOA; MLCOA; RLCOA	Survey	Champion invited cabin owner associations to fill out a Human Health Risk Assessment survey about local land use and consumption habits via a link with a submission deadline of March 25, 2025.
March 23, 2025	MLCOA	Phone	A Mills Lake cabin owners representative reached out to Champion to discuss Mills Lake access during the ongoing field campaign.
March 25, 2025	Cabin owners	Email	Champion provided a map to cabin owners and asked for confirmation that their cabins were located on the map. If not, Champion requested that the cabin owners identify their cabin on the map. This information would assist in planning the reinstallation of cabins.
March 27, 2025	Cabin owner living on an unnamed lake southeast of the Project in Québec	Meeting (in person)	Champion met with the cabin owner to discuss the potential effects of the Project on their cabin.
March 27, 2025	Cabin owner living on an unnamed lake northwest of the Project in Québec	Meeting (in person)	Champion met with the cabin owner to discuss the potential effects of the Project on their cabin.

DLCOA = Duley Lake Cabin Owners Association; EA = environmental assessment; MLCOA = Mills Lake Cabin Owners Association; NLDECC = Newfoundland and Labrador Department of Environment and Climate Change; RLCOA = Riordan Lake Cabin Owners Association.

22.4.4.2 Topics of Interest, Issues, and Concerns

The DLCOA expressed interest in discussing alternative options for access roads to the Project site, and sewage system discharge. DLCOA raised concerns and identified issues regarding vegetation and wetlands, water quality, access road, exploration, construction, compensation, land use and property rights, navigation, recreational activities and infrastructure, regional infrastructure and services, and safety.

MLCOA expressed interest in being included on the Project's email distribution list for updates on field programs. MLCOA raised concerns and identified issues regarding access road, agreements and negotiations, land use and property rights, regional infrastructure and services, and safety.

RLCOA expressed interest in environmental and socioeconomic topics. Feedback during engagement indicated an interest in snowmobile trails and visual understanding of tailings management. The RLCOA were concerned about environmental issues such as dust, water quality, and effects on vegetation in the Duley Lake Provincial Park. The RLCOA were also concerned about potential displacement of cabin owners and Champion's plans for the relocation and compensation.

Table 22-21 outlines the EIS chapters which address the issues and concerns raised by Cabin Owner Associations. Mitigation measures are summarized in the associated chapter of the EIS referenced in the table below and commitments are outlined in Chapter 23, Commitments Made in the Environmental Impact Statement.

Table 22-21: Cabin Owner Associations' Issues and/or Concerns

Cabin Owner Association or Cabin Owner Location	Topic of Interest	Issue and/or Concern	Summary of Issue and/or Concern	Where Addressed in the EIS	Raised in Alderon EIS (Yes/No)
MLCOA	Project component	Access road	MLCOA requested Champion develop alternative construction access road options for the Project.	– Chapter 2: Project Description – Chapter 3: Project Alternatives – Chapter 14: Other Land and Resource Use	No
			A cabin owner inquired on the main access road for the Project, as the proposal showed use of Mills Lake Road but a discussion with the Project team had noted Champion would travel around the other side of the hill.	– Chapter 14: Other Land and Resource Use	No
	Socioeconomic	Agreements and negotiations	MLCOA requested initiating negotiations on compensation for potential loss of cabin/cabin use.	– Chapter 14: Other Land and Resource Use	No
		Land use and property rights	MLCOA requested information from Champion about damage to Mills Lake Road during exploration program and requested Champion provide for repairs.	– Chapter 14: Other Land and Resource Use	No
		Regional infrastructure and services + safety	MLCOA informed Champion about repairs to the trail which they would like performed as compensation due to the impact from exploration campaign's equipment movements on the trail.	– Chapter 14: Other Land and Resource Use	No
DLCOA	Environmental	Water quality	DLCOA noted concern over any discharge in the lake.	– Chapter 8: Surface Water	No
	Project component	Access road	DLCOA requested Champion implement Health and Safety procedures for Duley Lake Road and Mills Lake trail crossing.	– Chapter 8: Surface Water	No
			DLCOA asked Champion to help to ensure improved communications on future movements on Duley Lake Road and Mills Lake trail.	– Chapter 14: Other Land and Resource Use	No
	Project phase	Exploration	DLCOA expressed concern over movement of heavy equipment through Duley Lake cabin area.	– Chapter 8: Surface Water	No
			DLCOA requested Champion for mapping and development plans for the Project site.	– Chapter 14: Other Land and Resource Use	No
		Construction	DLCOA suggested an alternate location to relocate the heavy equipment staging area.	– Chapter 14: Other Land and Resource Use	No
	Socioeconomic	Compensation	DLCOA requested Champion for information on the relocation options for cabin owners.	– Chapter 14: Other Land and Resource Use	No
			DLCOA requested Champion to share the costs of road maintenance and snow clearing for Mills Lake Road.	– Chapter 14: Other Land and Resource Use	No
			DLCOA requested Champion to financially support better road signalization and lighting on Mills Lake Road.	– Chapter 14: Other Land and Resource Use	No

Table 22-21: Cabin Owner Associations' Issues and/or Concerns

Cabin Owner Association or Cabin Owner Location	Topic of Interest	Issue and/or Concern	Summary of Issue and/or Concern	Where Addressed in the EIS	Raised in Alderon EIS (Yes/No)
		Navigation	DLCOA requested Champion to consider the boat crossings at Waldorf River via Duley Lake in summer time in the bridge design.	– Chapter 14: Other Land and Resource Use	No
		Recreational activities and infrastructure	DLCOA expressed concern about traffic congestion and safety on Duley Lake Road, and snowmobile trails.	– Chapter 14: Other Land and Resource Use	No
		Regional infrastructure and services	DLCOA requested Champion to remove wood debris to avoid potential injuries for quad and snowmobile users.	– Chapter 14: Other Land and Resource Use	No
RLCOA	Environmental	Vegetation and wetlands	RLCOA requested that Champion investigate the buffer zone between the overburden stockpile and the park.	– Chapter 10: Vegetation, Wetlands and Protected Areas	No
	Environmental	Vegetation and wetlands	RLCOA expressed concern regarding potential effects on endangered tree lichen in the Duley Lake Provincial Park.	– Chapter 10: Vegetation, Wetlands and Protected Areas	No
			RLCOA requested engagement with cabin owners who will likely have to be relocated if the Project moves forward.	– Chapter 14: Other Land and Resource Use	No
	Socioeconomic	Agreements and negotiations	RLCOA requested information on the relocation options for cabin owners.	– Chapter 14: Other Land and Resource Use	No
		Compensation	RLCOA requested discussion on potential displacement of cabins in that area.	– Chapter 14: Other Land and Resource Use	No
		Land use and property rights	RLCOA expressed interest in the snowmobile trail.	– Chapter 14: Other Land and Resource Use	No
		Regional infrastructure and services	RLCOA expressed interest in visual impacts of the height of mine rock stockpile, tailings and other infrastructure.	– Chapter 14: Other Land and Resource Use – TSD X: Visual Aesthetics Impact Assessment	No
Québec cabin owners	Environmental	Noise	Québec cabin owners expressed interest in noise modelling to understand if noise would be perceptible from their cabins.	– Chapter 6: Noise, Vibration, and Light	Yes
	Environmental	Air quality	Québec cabin owners expressed interest in understanding air quality modelling and if dust would be visible on the lakes during winter.	– Chapter 5: Air Quality and Climate Change	Yes
	Environmental	Visual aesthetic	Québec cabin owners expressed interest in visual impacts to understand if the Project would be visible from their lake.	– TSD X: Visual Aesthetics Impact Assessment	Yes

DLCOA = Duley Lake Cabin Owners Association; EIS = environmental impact statement; MLCOA = Mills Lake Cabin Owners Association; RLCOA = Riordan Lake Cabin Owners Association.

22.4.5 Kami Working Group

22.4.5.1 Engagement Activities

This section provides a summary of Project-specific engagement with Kami Working Group conducted to date. To date, the group has held five meetings and went on one mine site visit at the Bloom Lake mine to address key topics, including the engagement process, Project phases and timelines, Project components and economics, environmental impacts mitigations, potential compensation program, and the EIS Guidelines. Since the establishment of the Kami working group in May 2024 until March 31, 2025, Champion provided Kami Working Group with weekly memos to keep members informed about ongoing Project fieldwork and maintenance activities.

Table 22-22 provides a summary of key engagement activities undertaken with Kami Working Group between May 2024 and March 31, 2025.

Table 22-22: Kami Working Group–Key Engagement Activities

Date	Activity	Summary
May 13, 2024	Meeting (in person)	Champion held its first meeting with the Kami Working Group. An overview of the Kami Project Registration key items was presented to the group. Discussion on the draft Terms of References which were circulated prior to the meeting was held to collect comments from the group. Members began the discussion on what the scope of this group should be, and which topics of interest need to be addressed by the committee.
June 5, 2024	Meeting (virtual)	Champion met with Kami Working Group (meeting #2) to discuss the Project.
August 6, 2024	Meeting (in person)	Champion held its third meeting with the Regional Working Group. Champion provided more information on field work program and studies which will be pursuing over fall and winter 2025.
October 1, 2024	Meeting (in person)	Champion proposed a site visit of the Bloom Lake project to the Kami Working Group and proposed an overview of the operation. Champion provided information on water and tailings management.
October 15, 2024	Meeting (in person)	Champion met with Kami Working Group (meeting #4) to discuss the Project, the visual effects model and the additions of mitigations which had been identified by the Kami Working Group. Champion also presented an overview of the cabin owners compensation program.
January 29, 2025	Meeting (in person)	Champion met with Kami Working Group (meeting #5) to discuss the Project. Champion provided an update on Project activities and timelines, and on the feedback obtained during the three public information sessions held in December 2024. Champion also provided an update regarding the partnership announced with international partners.
May 6, 2025	Meeting (in person)	Champion provided an update to the Working group related to the Winter Advanced exploration campaign, the next field work activities, the timeline of the Project, the land use survey which was distributed in March and the cabin owner's compensation program.

22.4.5.2 Topics of Interest, Issues, and Concerns

Feedback received from the Kami Working Group is presented in sections for each respective stakeholder. An overview of all issues identified during consultation activities through March 2025 is shown in and discussed in Section 22.6.

22.4.6 Labrador West Alliance

This section provides a summary of Project-specific engagement with the Labrador West Alliance conducted to date. To date, Champion has attended four Labrador West Alliance meetings. Key topics addressed during the meetings related to the Kami Mining Project include the need for worker housing as part of the Kami Mining Project and identifying suitable areas for potential cabin development.

22.4.6.1 Engagement Activities

Table 22-23 provides a summary of key engagement activities undertaken with Labrador West Alliance between Project initiation on November 22, 2022, and June 12, 2025.

Table 22-23: Labrador West Alliance–Key Engagement Activities

Date	Activity	Summary
June 19, 2024	Meeting	Champion attended the first Labrador West Alliance meeting. The mandate of the committee, the topics to be addressed and the identification of participants within the committee were discussed.
November 21, 2024	Meeting	During the 2nd meeting, discussions were held on the Alliance scope, participation and structure. Discussions also occurred on housing need, energy shortage and how the Kami Mining Project is adding to the cumulative effects Labrador West has already been facing for over a decade.
March 25, 2025	Meeting	During the 3rd meeting, discussions were focused on Labrador West demographics, climate change and opening new area for land development. Presentations were made to the committee.
June 12, 2025	Meeting	During the 4th meeting, the committee focused on energy needs, mining workforce projection need for the upcoming years and Labrador West communities growth strategies.

22.4.6.2 Topics of Interest, Issues, and Concerns

The topics of interest for the Labrador West Alliance are related to the topics regional concern, including future development area, infrastructure needs, workforce, health care and travel costs and infrastructure.

Table XXX outlines the EIS chapters which address the issues and concerns raised by Labrador West Alliance. Mitigation measures are summarized in the associated chapter of the EIS referenced in the table below and commitments are outlined in Chapter 23, Commitments Made in the Environmental Impact Statement.

Table 22-24: White Wolf Snowmobile Club 0 Key Engagement Activities

Topic of Interest	Cumulative effects identified by the Lab-West Alliance	Summary of identified cumulative effects	Where Addressed in the EIS	Raised in Alderon EIS (Yes/No)
Socioeconomic	Towns development	The lack of available land and areas for development is identified as a growing issue to towns development both for housing development and for recreational access to the land.	Chapter 16: Service infrastructure	Yes
	Infrastructure needs	Many gaps in community infrastructures were identified which prevents from Town development, including electricity, water, sewer and other public utility infrastructure shortage.	Chapter 16: Service infrastructure	Yes
	Workforce	The mining companies all have projects which will require increased workforce needs.	Chapter 15: Economy and Employment	No
	Health care	The region is still facing with healthcare personnel shortage and a growing list of services that is difficult to receive in the region.	Chapter 15: Economy and Employment Chapter 16: Service infrastructure	Yes
	Travel	Travel cost and airport infrastructure contributes to the isolation of Labrador West residents and contributes to the unattractiveness of future residents.	Chapter 16: Service infrastructure	No

EIS = environmental impact statement.

22.4.7 White Wolf Snowmobile Club

White Wolf Snowmobile Club (WWSC) of Labrador City grooms in excess of 500 km of snowmobile trails and has a membership that pays fees to use the trail system (White Wolf Snowmobile Club 2025). WWSC keeps their membership informed regarding the field work that Champion is undertaking by posting/circulating the weekly field work memos.

22.4.7.1 Engagement Activities

This section provides a summary of Project-specific engagement with WWSC conducted to date. Communication with WWSC began on October 3, 2023. Since then, there has been a regular and ongoing exchange of communication and information through notices, memos, emails, site visits, as well as both virtual and in-person meetings. To date, WWSC has held three formal meetings to address key topics, including the engagement process, permitting requirements, and the EIS Guidelines.

Table 22-24 provides a summary of key engagement activities undertaken with WWSC between Project initiation on November 22, 2022, and March 31, 2025.

Table 22-25: White Wolf Snowmobile Club–Key Engagement Activities

Date	Activity	Summary
October 3, 2023	Meeting (in person)	Champion and WWSC met to provide an overview of the Project, discuss engagement and expectations.
December 5, 2023	Meeting (in person)	Champion met with the WWSC to obtain input on how better access Kami site without disturbing snowmobile trails and Duley Lake and Kelly's Pond residents. WWSC asked Champion for support in purchasing of a new groomer. Champion indicated that sharing the cost with Wabush and Labrador City would be agreeable. WWSC noted that it would provide Champion with paperwork for the purchase of a new groomer and the permits which will allow WWSC to widen the alternative trail.
February 2, 2024	Notice	Champion provided a notice and map to the WWSC for social media posting regarding work planned in the Duley Lake area.
February 23, 2024	Site visit	Champion met with the WWSC to ask questions about access, anticipated work, and equipment use. Champion responded and noted that drone work would begin in the near future.
May 2, 2024	Email	Champion informed the WWSC that the Project Registration had been submitted to NLDECC and provided a link to the NLDECC EA project list website.
November 4, 2024	Phone call	Champion and WWSC had a phone call to discuss planned preconstruction work east of the Project Development Area, anticipated for winter of 2024/2025. Champion requested that WWSC provide an updated map of their trail system. Champion advised WWSC that Champion would identify potential areas where trail users might encounter Project activities and propose safety mitigations measures, if required, upon receipt of the map. WWSC confirmed that the trail in question is not part of its maintained snowmobile system and raised no concerns. WWSC recommended that Champion contact local cabin owners' associations to inform them about the planned work.
November 4, 2024	Email	Champion provided WWSC with a summary of their October 4, 2024, phone conversation and a winter trail access map.
November 26, 2024	Email	Champion provided WWSC with an invitation to a public Project information session scheduled for December 10 and 11, 2024, in Wabush. Champion also invited WWSC to share the invitation within their network and across their communication platforms.

EA = environmental assessment; NLDECC = Newfoundland and Labrador Department of Environment and Climate Change; WWSC = White Wolf Snowmobile Club.

22.4.7.2 Topics of Interest, Issues, and Concerns

This section provides a summary of feedback received from the WWSC. WWSC expressed interest in receiving compensation from Champion for snowmobile trail grooming and identified issues regarding compensation.

Table 22-25 outlines the EIS chapters that address the issues and concerns raised by the WWSC. Mitigation measures are summarized in the associated chapter of the EIS referenced in the table below and commitments are outlined in Chapter 23, Commitments Made in the Environmental Impact Statement.

Table 22-26: White Wolf Snowmobile Club's Issues and Concerns

Topic of Interest	Issue or Concern	Summary of Issue or Concern	Where Addressed in the EIS	Raised in Alderon EIS (Yes/No)
Socioeconomic	Compensation	WWSC requested support from Champion to financially support the purchasing of a new groomer. Champion is willing to participate if both towns (Wabush and Labrador City) also participate in the purchase.	Chapter 14: Other Land and Resource Use	No

EIS = environmental impact statement; WWSC = White Wolf Snowmobile Club.

22.4.8 Other Public Stakeholders

22.4.8.1 Engagement Activities

This section provides a summary of Project-specific engagement with other public stakeholders conducted to date. Other public stakeholders include Club de Véhicules Tout-Terrain (VTT) du Grand Nord, Club de motoneige les Lagopèdes de Fermont, Cross Country NL, Dexter Inn, Duley Lake Family Park, Fermont Chamber of Commerce (Chambre de Commerce Fermont), Heritage NL, Labrador West Chamber of Commerce, land owners, MRC de Caniapiscau, members of the public, Menihek Nordic Ski Club, National Assembly of Québec, Newlab Realty, NL House of Assembly, NL Hydro, NL Premier's Office, PG Construction, Smokey Mountain Ski Lodge, and Tamarack Golf Course.

Table 22-26 provides a summary of key engagement activities undertaken with other public stakeholders between Project initiation on November 22, 2022, and March 31, 2025. These communications focused on sharing information about the Project's potential impacts and addressing key topics of interest, including worker accommodations and housing, town development in the Labrador West/Fermont area, Project power requirements, the engagement process, permitting requirements, and the EIS Guidelines.

Table 22-27: Other Public Stakeholders–Key Engagement Activities

Stakeholder	Date	Activity	Summary
VTT du Grand Nord	November 26, 2024	Email	Champion provided VTT du Grand Nord with an invitation to a Project public information session scheduled for December 12, 2024, in the Town of Fermont. Champion also invited Club de VTT du Grand Nord to share the invitation within their network and across their communication platforms.
Club de motoneige les Lagopèdes de Fermont	November 26, 2024	Email	Champion provided Club de motoneige les Lagopèdes de Fermont with an invitation to a Project public information session scheduled for December 12, 2024, in Town of Fermont. Champion also invited Club de motoneige les Lagopèdes de Fermont to share the invitation within their network and across their communication platforms.
Cross Country NL	November 26, 2024	Email	Champion provided Cross Country NL with an invitation to a Project public information session scheduled for December 12, 2024, in Wabush. Champion also invited Cross Country NL to share the invitation within their network and across their communication platforms.
Dexter Inn	January 28, 2025	Meeting (in person)	Champion met with Dexter Inn to discuss worker accommodations/housing and town development in the Labrador West/Fermont area.

Stakeholder	Date	Activity	Summary
Duley Lake Family Park	November 26, 2024	Email	Champion provided Duley Lake Family Park with an invitation to a Project public information session scheduled for December 12, 2024, in Wabush. Champion also invited Duley Lake Family Park to share the invitation within their network and across their communication platforms.
Fermont Chamber of Commerce	November 26, 2024	Email	Champion provided Fermont Chamber of Commerce with an invitation to a Project public information session scheduled for December 12, 2024, in the Town of Fermont. Champion also invited Fermont Chamber of Commerce to share the invitation within their network and across their communication platforms.
Heritage Foundation of Newfoundland and Labrador	February 23, 2024	Letter	WSP on behalf of Champion provided a letter to Heritage Foundation of Newfoundland and Labrador requesting information on registered heritage sites in the Project area.
	March 18, 2024	Email	Heritage Foundation of Newfoundland and Labrador informed WSP that there were no registered heritage sites in the Project area.
Labrador West Chamber of Commerce	May 14, 2024	Meeting (in person)	Champion met with Labrador West Chamber of Commerce to discuss the submission of the Kami Project Registration. Discussions were mainly focused on economic opportunities for local contractors. FIFO alternatives, housing and air transportation were also discussed.
	June 18, 2024	Meeting (in person)	As a new member of the Chamber of Commerce, Champion was invited to present the Project before its members. The procurement team also presented their procurement plan for the region for both Bloom Lake mine and pre-construction work which will be needed at the Kami site. About 45 people attended the meeting, where there was open dialogue.
	November 26, 2024	Email	Champion provided Labrador West Chamber of Commerce with an invitation to a Project public information session scheduled for December 12, 2024, in Wabush. Champion also invited Duley Lake Family Park to share the invitation within their network and across their communication platforms.
Land owners	August 22, 2023	Letter	Champion provided a letter to landowners regarding a drilling program starting in September and completing mid-October 2023.
Menihek Nordic Ski Club	March 28, 2024	Memo	Champion provided a memo about upcoming work to the Menihek Nordic Ski Club.
MRC de Caniapiscau	November 26, 2024	Email	Champion provided MRC de Caniapiscau with an invitation to a Project public information session scheduled for December 12, 2024, in the Town of Fermont. Champion also invited MRC de Caniapiscau to share the invitation within their network and across their communication platforms.
	December 15, 2024	Meeting (in person)	Champion met with MRC de Caniapiscau and the Town of Fermont to present an overview of the Project, highlighting its key aspects such as environmental management and optimizations aligned with the 2014 ministerial conditions.
	January 29, 2025	Meeting (in person)	Champion met with the Town of Fermont, and MRC de Caniapiscau to discuss worker accommodations/housing and town development in the Labrador West/Fermont area.

Stakeholder	Date	Activity	Summary
National Assembly of Québec (Assemblée nationale du Québec)	November 26, 2024	Email	Champion provided National Assembly of Québec with an invitation to a Project public information session scheduled for December 12, 2024, in the Town of Fermont. Champion also invited National Assembly of Québec to share the invitation within their network and across their communication platforms.
Newlab Realty	January 28, 2025	Meeting (in person)	Champion met with Newlab Realty to discuss worker accommodations/housing and town development in the Labrador West/Fermont area.
NL Hydro	August 3, 2023	Letter	Champion provided a letter to NL Hydro with an update on the Project, to note the power requirements and to officially start communication and collaboration.
	September 5, 2023	Meeting (in person)	Champion met with NL Hydro to provide an update on the Project and discuss the main challenge facing the Project being power requirements.
	November 2, 2023	Meeting (in person)	Champion met on November 2, 2023, with NL Hydro to discuss the power requirements for the Project. NL Hydro noted that Churchill Falls would increase production over the next 11 years. NL Hydro stated that Champion is not in their scope of work. Champion suggested to NL Hydro that a collaboration for a transmission corridor shared with Hydro Québec is an opportunity to assist Labrador West communities and the mining industry. NL Hydro indicated that the suggestion would be considered.
PG Construction	February 6, 2025	Meeting (virtual)	Champion met with PG Construction to discuss worker accommodations/housing and town development in the Labrador West/Fermont area.
Smokey Mountain Ski Lodge	November 26, 2024	Email	Champion provided Labrador West Chamber of Commerce and Smokey Mountain Ski Lodge with an invitation to a public Project information session scheduled for December 10 and 11, 2024, in the Town of Wabush. Champion also invited Labrador West Chamber of Commerce and Smokey Mountain Ski Lodge to share the invitation within their networks and across their communication platforms.
Tamarack Golf Course	June 14, 2024	Phone call	Champion conducted a courtesy call with the Tamarack Golf Course, following the June 5, 2024, Kami Working Group meeting. Tamarack Golf Course expressed support for the Project and confirmed they had no concerns.

FIFO = fly-in fly-out; VTT = Club de Véhicules Tout-Terrain; WSP = WSP Canada Inc.; NL = Newfoundland and Labrador.

22.4.8.2 Topics of Interest, Issues, and Concerns

No topics of interest, issues, and concerns have been raised by other public stakeholders to date.

22.5 Government Agencies

Communication and coordination with provincial and federal regulators are critical to the success of the Project's EA process. Early engagement helps to ensure that regulatory agencies are well informed about the Project and provides an opportunity to establish expectations, clarify regulatory requirements, and address potential issues and concerns prior to the submission of the final EIS. This proactive approach helps mitigate approval risks and facilitates a more effective review process.

Relevant government departments and agencies have been described in Chapter 1, Introduction. Champion initiated the provincial EA process through the submission of a new Project Registration document (WSP 2024b). The Department coordinated the review of the Project Registration document with interested government departments and agencies, and following a Decision Letter which concluded that an EIS would be required for the Project and an Environmental Assessment Committee was established. The

Environmental Assessment Committee represents the key regulatory agencies to be consulted for the Project. The Environmental Assessment Committee includes representatives from the following provincial and federal government agencies:

Provincial

- Department of Environment and Climate Change
  - Environmental Assessment Division–Chair
  - Climate Change Branch
  - Pollution Prevention Division
  - Water Resources Management Division
- Executive Council
  - Office of Indigenous Affairs and Reconciliation
  - Office of Women and Gender Equality
- Department of Fisheries, Forestry and Agriculture
- Department of Health and Community Services
- Department of Jobs, Immigration and Growth
- Department of Industry, Energy and Technology
  - Mines Branch
  - Energy Branch
- Department of Labrador Affairs
- Department of Municipal and Community Engagement
- Department of Tourism, Culture, Arts and Recreation

Federal

- ECCC
- Fisheries and Oceans Canada
- Transport Canada

22.5.1 Provincial Government

At the provincial level, regulatory engagement is primarily conducted through the EA Committee, which provides a structured framework for inter-agency coordination and oversight of the EA process. The EA Committee is composed of representatives from key NL government departments, each responsible for providing regulatory guidance and ensuring compliance with applicable environmental and industry regulations.

Champion has engaged with provincial regulators to provide Project updates, seek regulatory guidance, and address matters related to permitting, environmental management, and Indigenous engagement. Discussions have been structured around key milestones in the EA process to help ensure alignment with provincial legislative and policy requirements.

The EA Committee includes representatives from the following provincial departments:

- Department of Environment and Climate Change
- Department of Industry, Energy and Technology
- Office of Indigenous Affairs and Reconciliation

22.5.1.1 Department of Environment and Climate Change

22.5.1.1.1 Engagement Activities

Table 22-27 provides a summary of Project-specific engagement with NLDECC conducted to date. Champion met with NLDECC on eight occasions between June 29, 2023, to March 31, 2025, to discuss key topics including water quality and hydrology data, geotechnical drilling, dust, greenhouse gas emissions, impacts on fish, Indigenous engagement, provincial effluent and sewage regulations, permafrost, railway alignment, water quality and road options. In addition to these meetings, Champion and NLDECC exchanged emails to coordinate meeting logistics and to share supporting materials such as meeting notes and presentations.

Table 22-28: Newfoundland and Labrador Department of Environment and Climate Change–Key Engagement Activities

Date	Activity	Summary
June 29, 2023	Meeting (virtual)	Champion met with NLDECC, NLDIET, and NLOIAR to provide an update on baseline data and to discuss next steps in the EIS process.
July 27, 2023	Meeting (virtual)	Champion met with the Water Resources Management Division of NLDECC.
July 27, 2023	Meeting (in person)	Champion met with NLDECC.
August 16, 2023	Virtual invitation	WSP provided a virtual meeting invitation for a meeting to be held on August 16, 2023, with NLDECC to discuss water management and timelines on behalf of the Project team.
August 17, 2023	Email	Champion requested information from NLDECC regarding water quality and hydrology data and Alderon's Real-Time Monitoring Agreement.
August 24 to September 14, 2023	Email	Champion contacted the Pollution Prevention Division of NLDECC to schedule technical discussions related to the Project. In addition, Champion submitted a Request for Information to help inform the characterization of baseline conditions for the Project.
September 19, 2023	Meeting (virtual)	WSP presented details on the surface water baseline program and an overview of the Project. The EIS commitments were discussed.
September 20 to 21, 2023	Email	Champion discussed meeting logistics with NLDECC.
October 12, 2023	Email	WSP provided the meeting notes and presentation for a meeting held on August 16, 2023 with NLDECC about a discussion regarding water management and timelines for the Project.
October 23 to 24, 2023	Email	WSP provided the presentation and notes for meetings to NLDECC held on September 13 and 28, 2023, about the Hydrogeological Model, the Air Quality and Greenhouse Gases conditions and effects for the Project and the Real-Time Monitoring Network, Air Quality/Dust Modelling program.
November 3, 2023	Meeting (in person)	Champion met with NLDECC to discuss the Project, provide an update and introduce Green Steel.
November 30, 2023	Email	Champion requested virtual meeting availability from the Water Resources Division of NLDECC to share updates on the Hydrogeology field program happening at site.
December 8, 2023	Email	Champion asked the NLDECC about permitting requirements regarding the winter geotechnical drilling program and provided NLDECC with a map.
December 13, 2023	Meeting (virtual)	Champion, WSP, and NLDECC met to discuss the Project Hydrogeology field program.
December 20, 2023	Email	NLDECC provided permitting information to Champion and included a link to the application form for a Section 48 permit to alter a Body of Water as well as direction on submitting the information.
February 7, 2024	Email	NLDECC provided correspondence to Champion that was sent to the Matimekush-Lac John First Nation and NNK regarding geotechnical drilling to support the design of water management infrastructure regarding the Project and the 30-day comment period.
May 22, 2024	Meeting (in person)	Following the Project Registration submission, Champion held a meeting with NLDECC to discuss key aspects of the Project and exchange on the potential scenarios for the EA assessment.
July 11, 2024	Meeting (in person)	Champion met with the NL's Governmental Assessment Committee to discuss the Kami Mining Project prior to receiving the draft guidelines on the EIS. The meeting focused on the Project's scope, the mitigation measures to be implemented and to obtain the main areas of questioning from each departmental division.
March 22, 2025	Email	WSP provided NLDECC with information on the draft Project baseline reports planned for submission, including identified data gaps and the organization of the reports within the EIS.

Date	Activity	Summary
March 27, 2025	Email	NLDECC provided WSP with comments on the draft Project baseline reports from the NL Department of Tourism, Culture, Arts and Recreation Provincial Archaeology Office.

EA = environmental assessment; EIS = environmental impact statement; NNK = Naskapi Nation of Kawawachikamach; NLDECC= Newfoundland and Labrador Department of Environment and Climate Change; NLDIET = Newfoundland and Labrador Department of Energy and Technology; NLOIAR = Newfoundland and Labrador Office of Indigenous Affairs and Reconciliation; NL = Newfoundland and Labrador; WSP = WSP Canada Inc.

22.5.1.2 Department of Industry, Energy and Technology, Newfoundland and Labrador

The Department of Industry, Energy and Technology is focused on innovation, economic development and diversification in the province.

22.5.1.2.1 Engagement Activities

Table 22-28 provides a summary of Project-specific engagement with NL Department of Energy and Technology (NLDIET) conducted to date. Champion met with NLDIET on five occasions between June 29, 2023, to March 31, 2025 to discuss key topics including the Closure Plan, drilling, the Bloom Railway optimization, water quality, fish and fish habitat, impacts on communities, and engagement processes. In addition to these meetings, Champion and NLDIET exchanged emails to coordinate meeting logistics and to share supporting materials such as meeting notes and presentations.

Table 22-29: Newfoundland and Labrador Department of Industry, Energy and Technology–Key Engagement Activities

Date	Activity	Summary
June 29, 2023	Meeting (virtual)	Champion met with NLDECC, NLDIET, and NLOIAR to provide an update on baseline data and to discuss next steps in the EIS process.
August 24, 2023	Email	Champion requested a meeting with the Mineral Development Division, NLDIET to discuss Champion's approach for the Project's Closure Plan.
August 24, 2023	Email	WSP introduced the Project to NLDIET. WSP requested NLDIET's availability for a meeting to discuss the approach for the Project's Closure Plan.
August 25, 2023 – September 7, 2023	Email	WSP and NLDIET discussed logistics for scheduling a meeting to discuss the Closure Plan.
September 18, 2023	Meeting (virtual)	Champion, Okane Consultants and WSP provided a closure planning presentation to NLDIET.
October 23, 2023	Email	WSP provided meeting notes and a presentation for the meeting on September 18, 2023, with NLDIET regarding closure planning on the Project.
October 24, 2023	Email	WSP provided a revised presentation for the meeting on September 18, 2023, with NLDIET regarding closure planning on the Project.
November 3, 2023	Meeting (in person)	Champion provided an update to the NLDIET.
November 4, 2023	Meeting (in person)	Champion provided an overview of the Project to NLDIET who requested drilling program information.

NLDIET = Newfoundland and Labrador Department of Energy and Technology; WSP = WSP Canada Inc.; NLDECC= Newfoundland and Labrador Department of Environment and Climate Change; NLOIAR = Newfoundland and Labrador Office of Indigenous Affairs and Reconciliation; EIS = environmental impact statement.

22.5.1.3 Office of Indigenous Affairs and Reconciliation, Newfoundland and Labrador

The Office of Indigenous Affairs and Reconciliation builds relationships with Indigenous Peoples towards sound government policies and programs towards supporting Indigenous communities.

22.5.1.3.1 Engagement Activities

Table 22-29 provides a summary of Project-specific engagement with NL Office of Indigenous Affairs and Reconciliation (NLOIAR) conducted to date. Champion has had six meetings with NLOIAR from June 29, 2023, to March 31, 2025 to discuss the consultation process and agreements, environmental and socioeconomic concerns about dust, water quality, fish and fish habitat, impacts on communities and Indigenous engagement, compensation for fish habitat and Project updates. In addition to these meetings, Champion and NLOIAR exchanged emails to coordinate meeting logistics and to share supporting materials such as meeting notes and presentations.

Table 22-30: Newfoundland and Labrador Office of Indigenous Affairs and Reconciliation–Key Engagement Activities

Date	Activity	Summary
June 29, 2023	Meeting (virtual)	Champion met with NLDECC, NLDIET, and NLOIAR to provide an update on baseline data and to discuss next steps in the EIS process.
September 5, 2023	Meeting (in person)	Champion met on September 5, 2023, with NLOIAR to provide an update on the Project, provide information on Indigenous consultation and noted that high purity iron is a critical mineral in NL's Critical Mineral Strategy.
October 27, 2023 – October 31, 2023	Email	Champion and NLOIAR communicated about meeting logistics for a meeting to discuss the consultation process.
November 2, 2023	Meeting (in person)	Champion met with NLOIAR and confirmed that consultation with five First Nations is essential with the following Indigenous Nations: the Innu Nation and the NunatuKavut Community Council in Labrador as well as ITUM, Matimekush-Lac John, and the Naskapi in Québec.
November 3, 2023	Meeting (in person) and email	NLOIAR had a meeting with Champion where it was noted that Champion was required to fulfill certain procedural aspects of the Crown's duty of consult and contact information was shared by email.
November 6, 2023	Email	NLOIAR provided Champion with a court decision link and Champion replied asking for the interpretation of the court decision.
November 14, 2023	Email	NLOIAR provided Champion with an Aboriginal Consultation Policy dated 2013.
March 4, 2024	Letter	WSP requested cultural heritage information from NLOIAR, on behalf of Champion. WSP provided a letter to ask about known or potential heritage properties within or adjacent to the site study area.
May 22, 2024	Meeting (in person)	Champion held a meeting with NLOIAR to discuss key milestones and the consultation process.
June 10, 2024	Meeting (virtual)	Champion met with NLOIAR to discuss the provincial process to meet consultation requirements in prevision of the drafting of consultation agreements with Indigenous groups.
July 8, 2024	Meeting (virtual)	Champion me with NLOIAR to discuss the provincial process for consultation and exchange on best practice for permit and authorization submissions.
September 9, 2024	Meeting (virtual)	Champion provided an update to NLOIAR on their Consultation Plan, the submission of consultation agreements and feedback on recent permit applications.
October 17, 2024	Meeting (virtual)	Champion met with NLOIAR to discuss the status of preconstruction activities, the Consultation Agreement and the compensation project for fish habitat.
October 18, 2024	Email	Champion provided the NLOIAR the October 17, 2024, meeting presentation slides.
December 16, 2024	Meeting (virtual)	Champion met with NLOIAR to exchange on the consultation process with Indigenous groups prior to the issuance of the official Guidelines.

Date	Activity	Summary
January 20, 2025	Meeting (virtual)	Champion provided an update on the EIS submission to the NLOIAR and discuss key areas for Indigenous revision.
February 17, 2025	Meeting (virtual)	Champion and NLOIAR met to discuss the EIS Guidelines, Consultation Agreements, and the advanced exploration campaign.
March 25, 2025	Meeting (in person)	Champion met with NLOIAR in St. John's to discuss the EIS draft progression and to provide an update on the status of participation in the EIS for each Indigenous group identified in the Project.

ITUM = Innu Takuaikan Uashat mak Mani-Utenam; NLOIAR = Newfoundland and Labrador Office of Indigenous Affairs and Reconciliation; WSP = WSP Canada Inc.; NL = Newfoundland and Labrador; EIS = environmental impact statement; NLDIET = NLDIET = Newfoundland and Labrador Department of Energy and Technology; NLDECC = Newfoundland and Labrador Department of Environment and Climate Change.

22.5.1.4 Department of Fisheries, Forestry and Agriculture, Newfoundland and Labrador

The NLDFFA balances natural renewable resources while supporting development of fisheries, aquaculture, forestry, agriculture and agrifoods.

22.5.1.4.1 Engagement Activities

The NLDFFA received weekly maps and memos regarding field work activities from February 13, 2024, to April 26, 2024, from Champion. Champion met with NLDFFA on October 24, 2024, and the discussion included inland fisheries, caribou and stewardship agreements.

Table 22-31: Newfoundland and Labrador Department of Fisheries, Forestry and Agriculture

Date	Activity	Summary
February 13 to April 26, 2024	Memo	Champion provided a map and memo to NLDFFA that was sent to stakeholders near Duley Lake regarding upcoming work in the area for every week.
October 24, 2024	Virtual meeting	Champion met with NLDFFA (Wildlife Division) to discuss the Project and the EIS. Champion and NLDFFA (Wildlife Division) reviewed the previous and current EIS, identifying elements from the previous EIS that could be incorporated into the current EIS.

EIS = environmental impact statement; NLDFFA = Newfoundland and Labrador Department of Fisheries, Forestry and Agriculture.

22.5.1.5 Other Provincial Government Agencies

22.5.1.5.1 Engagement Activities

Table 22-31 provides a summary of Project-specific engagement with other provincial government agencies conducted to March 31, 2025.

Champion met with the Department of Immigration, Population Growth & Skills (now the Department of Jobs, Immigration and Growth) on November 2, 2023, to discuss employment requirements regarding trades and labour pool forecast.

On February 11, 2025, Champion and the Department of Natural Resources met to discuss the EIS.

WSP inquired about heritage sites on behalf of Champion with the NL Department of Tourism, Culture, Arts and Recreation by email and letter on September 27, 2023, and February 23, 2024, respectively. NL Department of Tourism, and Culture, Arts and Recreation confirmed that were no registered heritage sites in the Project area on March 18, 2024, and expressed interest in the cultural heritage reports.

Table 22-32: Other Provincial Government Agencies–Key Engagement Activities

Provincial Agency	Date	Activity	Summary
NL Department of Jobs, Immigration and Growth	November 2, 2023	Meeting (in person)	Champion provided an update to the Department of Jobs, Immigration and Growth.
NL Department of Natural Resources	February 11, 2025	Meeting (virtual)	Champion, WSP and NL Department of Natural Resources met to discuss the coordination of the EIS.
NL Department of Tourism, Culture, Arts and Recreation	September 27, 2023	Email	WSP provided Parks Division with a Scientific Research Permit application along with supporting documentation.
	February 23, 2024	Letter	WSP on behalf of Champion provided a letter to NL Department of Tourism, Culture, Arts and Recreation requesting information on registered heritage sites in the Project area.
	March 18, 2024	Email	NL Department of Tourism, Culture, Arts and Recreation informed WSP that there were no registered heritage sites in the Project area.

EIS = environmental impact statement; NL = Newfoundland and Labrador; WSP = WSP Canada Inc.

22.5.2 Federal Government

The below sections provide a summary of Project-specific engagement with federal government regulators conducted to date. The Project team met with the EA Committee including provincial and federal regulators in February 2025.

22.5.2.1 Environment and Climate Change Canada

ECCC leads the federal government on a range of environmental issues.

22.5.2.1.1 Engagement Activities

Table 22-32 provides a summary of Project-specific engagement with ECCC conducted to March 31, 2025. Champion notified ECCC of the Project Registration having been submitted on April 30, 2024, and provided a link to the documents.

Table 22-33: Environment and Climate Change Canada–Key Engagement Activities

Date	Activity	Summary
May 2, 2024	Email	Champion provided an update to ECCC regarding the Project Registration having been submitted on April 30, 2024. Champion provided a link to the documents on the EA list from the ECCC website. Champion noted availability for a meeting in the upcoming weeks if ECCC indicated a need for a meeting.

ECCC = Environment and Climate Change Canada; EA = environmental assessment.

22.5.2.2 Fisheries and Oceans Canada

Fisheries and Oceans Canada (DFO) manages resources for fisheries and oceans, and keeps water safe with habitat protection and economic oversight.

22.5.2.2.1 Engagement Activities

Table 22-33 provides a summary of Project-specific engagement with DFO conducted to March 31, 2025. Champion notified DFO of the Project Registration having been submitted on April 30, 2024 and provided a link to the documents.

Table 22-34: Fisheries and Oceans Canada–Key Engagement Activities

Date	Activity	Summary
May 2, 2024	Email	Champion provided an update to DFO regarding the Project Registration having been submitted on April 30, 2024. Champion provided a link to the documents on the EA list from the ECCC website and offered to meet with DFO the week of May 20, 2024. The offsetting Project options and assessment of the fish habitat losses associated with Project infrastructure were presented and discussed.

DFO = Fisheries and Oceans Canada; EA = environmental assessment; ECCC = Environment and Climate Change Canada.

22.5.2.3 Impact Assessment Agency of Canada

The Impact Assessment Agency of Canada (IAAC) conducts assessments of projects that bring benefits within a sustainable framework to help ensure that the environment and Indigenous rights are balanced along with economic growth.

22.5.2.3.1 Engagement Activities

Table 22-34 provides a summary of Project-specific engagement with IAAC conducted to March 31, 2025. Champion met with IAAC on June 28, 2023 and May 22, 2024 two occasions, to discuss key topics including Port of Sept-Îles, caribou and caribou habitat, cumulative effects on caribou and caribou habitat and regional infrastructure and services. Champion also provided IAAC a link with the Project Registration documents for that were submitted on April 30, 2024, to NL government.

Table 22-35: Impact Assessment Agency of Canada–Key Engagement Activities

Date	Activity	Summary
June 28, 2023	Meeting (in person)	Champion presented the Project to IAAC and received clarification on the impact assessment process from IAAC.
May 2, 2024	Email	Champion provided an update to IAAC regarding the Project Registration having been submitted on April 30, 2024. Champion provided a link to the documents on the EA list from the ECCC website. Champion noted availability for a meeting in St. John's, NL, during the week of May 20, 2024.
May 22, 2024	Meeting (virtual)	Following the registration of the Kami Mining Project, Champion wanted to confer with IAAC to seek their level on interest on the Project from a federal assessment perspective. IAAC provided an email noting that the Project was exempt from participating in a federal impact assessment.
June 19, 2024	Email	The IAAC provided an email confirming that based on the review of the registration document and following the meeting on May 22, 2024, the Agency is of the opinion that the IAAC does not apply to the Project.

EA = environmental assessment; ECCC = Environment and Climate Change Canada; IAAC = Impact Assessment Agency of Canada; NL = Newfoundland and Labrador.

22.5.2.4 Transport Canada

Transport Canada is responsible for overseeing the transportation system to move people and goods efficiently and safely with regulation and collaboration.

22.5.2.4.1 Engagement Activities

Transport Canada provided an email with a link to the Navigation Protection Program on July 17, 2024, and another email regarding Navigable waters permitting requirements on February 13, 2025. Engagement activities with Transport Canada until March 31, 2025, are found in Table 22-35.

Table 22-36: Transport Canada–Key Engagement Activities

Date	Activity	Summary
July 18, 2024	Email	Transport Canada provided Champion with an update from Transport Canada's Navigation Protection Program regarding the regulatory requirements related to the Project. Transport Canada also provided a link to the Navigation Protection Program application website and additional guidance on the Navigation Protection Program regulatory process.
February 13, 2025	Email	Transport Canada provided an email regarding navigable waters permitting requirements.
May 14, 2025	Email	Transport Canada confirmed that there are no bridge design guidelines available for use but confirmed the applicability of the *Canada Navigable Waters Act* (CNWA) to the Project. A copy of the previous correspondence on July 18, 2024 was attached to the email for reference which identified components of the Project that are subject to the CNWA.

CNWA = *Canada Navigable Waters Act*.

22.6 Identification and Validation of Issues and Concerns

The issue tracking and resolution process is described in the KEP (Annex 5G). All comments from public stakeholders (including domestic wood cutters) and Indigenous groups (written or verbal) as well as responses from Champion will be documented and, where applicable, considered in the preparation of the EIS and design and planning of the Project. Input from public stakeholders (including domestic wood cutters) and Indigenous groups will be obtained at open houses, meetings, and personal contact through verbal and written comments (i.e., comment forms). Depending on the magnitude and nature of any concerns, Champion will make every effort to address and resolve the concern directly with the stakeholders.

22.6.1 Issues to Date

Champion has been active in meeting with stakeholders and Indigenous groups. Throughout the approach identified in Section 22.1.2, Champion categorized identified issues to develop an understanding of the relative significance of issues to various stakeholders and Indigenous groups. An overview of all issues identified during consultation activities through March 2025 is shown in .

Following meetings, Champion provided the meeting notes to participants to allow for feedback, proposed edits, or validation of issues and concerns from participants. In addition, if there have been other communication modes such as email, texts or phone calls, a record of these types of discussions and their follow-up has been tracked. Public open house issues and concerns were added to an issues sticky notes board by participants, which was then summarized in the meeting notes. Issues have been added to a separate tracking system so that the responses can also be logged and follow-up occurs.

An example of listening and responding to stakeholders is the discussion Champion held with cabin owners concerned about access roads. After hearing cabin owners' concerns, Champion kept cabin owners informed and discussed alternative options to reduce impacts on their day-to-day life and risks of incidents. Champion committed to financially participate in the maintenance of Mills Road and a created better communication system for future movement on Mills Road.

In the spirit of Ownership, Control, Access, and Possession (OCAP®), Indigenous communities described in this Engagement chapter was provided with an opportunity to review and assess the information on their communities prior to EIS submission. The information was derived from public sources such as Statistics Canada, Crown-Indigenous Relations and Northern Affairs Canada, and the Indigenous communities' websites. The First Nations principles of Ownership, Control, Access, and Possession is applied to Indigenous Knowledge and the information provided by Indigenous communities (First Nations Information Governance Centre 2025). The principle of Ownership, under Ownership, Control, Access, and Possession means that Indigenous communities own their cultural knowledge, data, and information. The principle of Control means that Indigenous communities have the right to oversee all parts of research, from planning to management and review. Regarding the principle of Access, Indigenous communities must be able to access information and data about themselves, no matter where it is stored. The principle of Possession means Indigenous communities have physical control over Indigenous data to protect it.

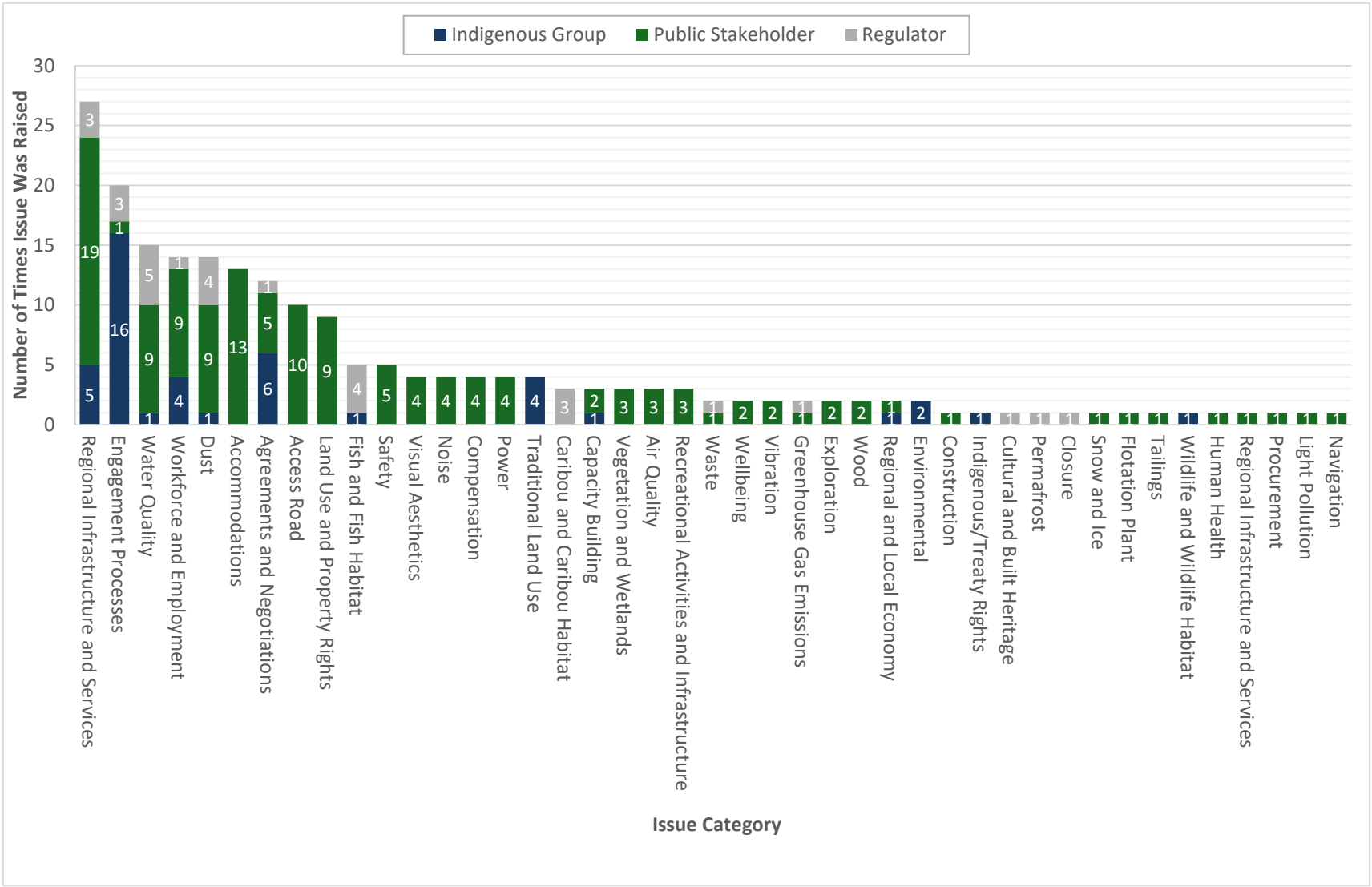


Figure 22-2: Frequency of Issues Identified During Consultation Activities

22.7 Moving Forward

Engagement with Indigenous groups, public stakeholders, and regulators will continue throughout the life of the Project, as outlined in the following subsections.

22.7.1 Construction

During the Construction phase of the Project, Champion will maintain ongoing communication with the public stakeholders (including domestic wood cutters) and Indigenous groups to keep them informed about Construction phase progress, potential disruptions, and mitigation measures. Local employment and procurement will be prioritized to help ensure that the benefits of the Project directly reach local communities and groups. Champion will work with its contractors so that they are aware of engagement requirements and comply with commitments made.

Public engagement activities during the Construction phase will include:

- implementation and continuous improvement of the plans, including the KEP
- public announcement and press release at the onset of the Construction phase
- posting construction signage and placing flagging in relevant areas to advise the public to exercise caution
- public information sessions and community events to continue face-to-face community engagement

22.7.2 Operation and Maintenance

During the Operations and Maintenance phase of the Project, Champion will continue to engage with public stakeholders (including domestic wood cutters) and Indigenous groups through established channels to address issues or concerns relating to operations such as noise, vibration, marine traffic, and land and resource use. Public engagement activities during this phase will include:

- public announcement and press release at the onset of the Operations and Maintenance phase
- Project commencement press conference for public stakeholders (including domestic wood cutters), Indigenous groups, media, and local communities
- provision of facility and site tours to local government, service organizations, and other interested parties

22.7.3 Closure

Champion intends for the Project to remain operational for 26 years. Upon the eventual Closure phase of the Project, Champion will collaborate with public stakeholders and Indigenous groups to implement decommissioning and rehabilitation plans. The public will be made aware of Project developments relating to decommissioning and rehabilitation. Public engagement during this phase will include:

- meetings and presentations on the development of a Decommissioning and Rehabilitation Plan
- public information session to gather feedback on community expectations for the area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23. Commitments Made in the Environmental Impact Statement

The purpose of **Chapter 23, Commitments Made in the Environmental Impact Statement** (EIS) is to provide a list of the commitments made by Champion Kami Partner Inc. (Champion) in the EIS, related to future fieldwork and engagement, environmental effects mitigation and management measures, and environmental monitoring and follow-up. This chapter meets the requirements of Section 15 (Commitments Made in the EIS) of the EIS Guidelines issued on December 19, 2024, by the Newfoundland and Labrador Department of Environment and Climate Change (Government of NL 2024). These commitments are in addition to the commitments and conditions of release from the previous EIS that have already been fulfilled through this EIS. A compiled list of fulfilled commitments from the previous EIS is presented in **Chapter 1, Introduction**.

The list of commitments is provided in Table 23-1 and provides the chapter of the EIS where the commitment is made, the commitment type, a description of each commitment, and the applicable temporal phase(s) of the Kami Project (Project) when the commitment would be addressed.

Each commitment is categorized by commitment type, to identify the activity associated with the commitment. These commitment types include:

- **future work,** which is to be undertaken by Champion following the submission of the EIS, such as additional studies or engagement
- permitting, to be secured in support of permitting and approvals (beyond the EIS) required for the implementation of the Project
- mitigation and/or monitoring, that reference or are supplementary to mitigation and monitoring requirements included in the VEC technical assessments (**Chapter 5, Air Quality and Climate** to **Chapter 19, Effects of the Environment on the Project**), which are summarized in **Chapter 20, Environmental Management, Monitoring and Follow-Up**

For the purpose of this chapter, the Project phases are identified as:

- **Pre-construction and Permitting phase (3 years)**—The permitting and approvals stage includes release from the provincial environmental assessment process from the Government of Newfoundland and Labrador and receipt of permits from applicable provincial and federal regulatory agencies.
- **Construction phase (4 years)**—Includes site preparation; mine, process plant and site infrastructure development; and commissioning the structures, systems, and components.
- **Operations and Maintenance phase (referred to as Operations; 26 years)**—Includes the mining and milling of iron ore, production and shipment of iron ore concentrate, tailings management, management of mine rock, waste management, water management, release of treated effluent, site maintenance and transportation of staff and materials to and from the site. Operations includes one year of pre-development mining (i.e., ramp-up).
- **Decommissioning and Rehabilitation phase (referred to as Closure; 10 years)**—Includes accelerated flooding of the Rose Pit, re-establishment of passive surface water drainage following the pit-flooding period, recontouring and revegetating disturbed areas. Physical infrastructure that is not required during post-closure monitoring and for other activities required to achieve the Project's decommissioning criteria and to return the Project site to a safe and stable condition will be removed.
- **Post-Closure period (40 years)**—The transition from Closure to Post-closure involves ongoing dam safety monitoring, water treatment, and environmental monitoring to verify that water quality is achievable for passive discharge and decommissioning criteria have been met. The length of the Post-closure period could be further refined through the completion of additional analysis as part of the Feasibility Study.

Champion will adhere to provincial, federal, and municipal legislation and permitting requirements throughout all phases of the Project. Champion is committed to honoring its commitments made through engagement with Indigenous groups, public stakeholders, and regulatory agencies. Following the submission of the EIS, optimizations and improvements to the Project may be identified through subsequent engineering and design efforts. These updates may address the commitments listed in Table 23-1 or mitigate predicted environmental effects, potentially reducing the need for certain commitments. The commitment list is dynamic, and Champion will periodically review and adjust it with the Department of Environment and Climate Change as the Project evolves.

Table 23-1: Commitments Made in the Environmental Impact Statement

Applicable EIS Chapter	Commitment Type	Commitment	Preconstruction / Permitting	Construction	Operations	Closure	Post-closure
Chapter 1: Introduction	– Permitting	Champion commits to joining the Mining Association of Newfoundland and Labrador following environmental assessment release and Project sanction.	X				
	– Permitting	The Rehabilitation and Closure Plan will be submitted to the province if the Project is deemed approved and will be updated every five years until Closure.	X	X	X		
	– Permitting	Other federal, provincial, and municipal legislation and regulations will be applicable to the Project, and will be administered by the responsible regulatory agency, department, division, or municipality. Numerous approvals, permits, and authorizations are required from federal, provincial, and municipal regulators prior to Project initiation. In addition, throughout Project construction and operation, compliance with terms and conditions of approval, various standards contained in federal and provincial legislation, and regulations and guidelines will be required. Permits, approvals, and authorizations generally contain conditions that, combined with other regulatory requirements and environmental constraints, make up commitments that Champion will need to address through Project design and during the Construction, Operations, and Closure phases. A summary of potentially applicable legislation, regulations, and preliminary permits, authorizations, and approvals for the Project is provided in Table 1-4 in Chapter 1.	X	X	X	X	
	– Future work	Champion is committed to fostering an inclusive work environment dedicated to promoting diversity, equality, and inclusive practices within its organization. These values will be integrated into all aspects of the Kami Project's operations, from construction through to mine closure. Champion acknowledges a Benefits agreement which includes a Gender Equity and Diversity Plan was signed between the Government of Newfoundland and Labrador and the Kami mine Limited Partnership in 2014. Champion is determined to fulfill the commitments within the agreement to the best of its abilities. It is a strong belief for Champion that the updated Gender Equity, Diversity and Inclusion Plan shall address access to training, employment, and procurement opportunities for women, Indigenous peoples, and other underrepresented groups. This plan will apply to both Champion and its contractors, and it will be reinforced by corporate policies that promote diversity and inclusivity. To make sure it respects current standards and expectations, an assessment of the 2014 Gender Equity and Diversity Plan is currently underway to inform the new and up to date Gender Equity, Diversity and Inclusion Plan Champion is developing. Following this assessment, the Workforce and Employment Plan will be updated and issued prior to the construction phase. Champion remains committed to firmly establish local benefits in employment, training and business opportunities as stated in the 2014 Provincial Benefits agreement. Champion will work in collaboration with industry, various levels of government, educational and training institutions, Indigenous groups, communities and stakeholders to develop strategies aimed at creating local benefits and promoting diversity and inclusion throughout the Project. We strongly believe that a collaborative and inclusive approach is required to unlock the full potential of the Labrador Trough and to maximize the benefits of the Kami Project. The Labrador West Alliance will play a key role in leveraging the strengths of all involved parties in achieving those objectives. Both the Benefits Agreement and the Gender Equity, Diversity and Inclusion Plan will provide the opportunity for ongoing collaboration with industry, government, educational and training institutions, Indigenous groups, communities, and stakeholders to formulate strategies directed at local benefits creation and diversity and inclusion during the life of the Project. The plans will outline the goals and initiatives that will be implemented throughout the Project and the measures that will be implemented to ensure, to the extent possible, that there is fair and equitable access to the benefits associated with the Project.	X				
Chapter 2: Project Description	– Permitting	Champion will engage with applicable government departments to discuss updating the surface lease for the Project to reflect the optimization of the Project for components currently outside of the surface lease such as the railway and access roads.	X				
	– Future Work	Champion is continuing to progress their geochemical program. This includes: — A blended kinetic column test — Additional NORM testing of samples from the Menihek and Sokoman formations to further characterize NORM risk and inform the waste management strategy for Project operations. — Humidity cell testing of additional units identified as future mine rock. As results become available, they will be will be shared with applicable regulatory authorities, incorporated into the waste and water management strategy for the Project and inform Project mitigation and monitoring requirements, which will be documented in the Environmental Protection Plan, Environmental Effects Monitoring Plan and/or the Waste Management Plan.	X	X	X		
	– Future Work	Design of the access road alignments are preliminary, and Champion will further refine the access road alignments as the Project advances through subsequent stages of engineering.	X				
	– Future Work	A request to transport additional tonnages from the Project may trigger Québec North Shore & Labrador Railway to do another capacity review. Without this assessment being completed, Champion cannot assess the cumulative effects of the incremental traffic on the railway, including potential effects to species at risk such as caribou populations (migratory and boreal / woodland).	X				
	– Future Work	Where vegetation removal and tree clearing are completed within Domestic Cutting Block CC22503, Champion will consult with domestic wood cutters to evaluate opportunities to improve access to the harvested wood has presented in the Kami Engagement Plan (Annex 5G).	X	X			
	– Future Work	Champion will continue to explore additional borrow source opportunities and refine quantity estimates through successive stages of engineering.	X				
	– Monitoring	During Closure, drain down and seepage water quality will be monitored using the seepage and run-off collection ditches constructed along the toe of the perimeter of the TMF.				X	
	– Monitoring	Surface and seepage water will be routinely tested during the Closure phase. The pumping system and pipeline transferring the non-contact water from Mid Lake to Pike Lake will be maintained until the Rose Pit is flooded and water quality in the Rose Pit has reached acceptable discharge quality.				X	
	– Monitoring	During the post-closure period, monitoring of the tailings dam will be performed for 50 years with dam safety reviews performed every 5 years, or until the above criteria can be successfully met. Geotechnical inspections will be performed annually. Signage will be used during the post-closure monitoring period of the TMF to alert the public and site visitors to the risks associated with the TMF prior to reclassification.					X
	– Monitoring	Environmental post-closure monitoring programs will continue after final closure activities are completed for an estimated 6 to 10 years noting that final closure for some key components will be closed and rehabilitated prior to the end of operations.					X

Applicable EIS Chapter	Commitment Type	Commitment	Preconstruction / Permitting	Construction	Operations	Closure	Post-closure
	– Monitoring – Future Work	The post-closure and long-term monitoring plans have yet to be developed. These programs will be developed based on the experience gained through monitoring plans during construction and operations it is anticipated that the closure monitoring plans will mirror the operational monitoring program to provide continuity of data and a historical baseline. It is also anticipated that, as the post-closure monitoring program moves forward, the monitoring requirements will decrease until they will no longer be required.					X
	– Future Work	The final design of the camp will be determined following consultation and collaboration with the local municipalities and provincial government.	X				
	– Future Work	Proposed Project refinements and optimizations outside of the site study area will be discussed with the Newfoundland and Labrador Department of Environment and Climate Change.	X				
Chapter 3: Project Alternatives	– Permitting	Before Project activities resulting in deposition of mine waste begin, an amendment under Schedule 2 of the *Metal and Diamond Mining Effluent Regulations* from Environment and Climate Change Canada is required.		X			
Chapter 5: Air Quality and Climate	– Permitting	Based on the annual estimates of Project GHG emissions, it is anticipated that the Project would be required to report its emissions under the provincial *Management of Greenhouse Gas Act* (MGGA) and Government of Canada Greenhouse Gas Reporting Program. The Project would also be subject to GHG emission reduction targets under MGGA.		X	X	X	
	– Permitting	A plan by which net zero GHG emissions may be realized or maximum GHG reductions will be otherwise realized by 2050 will be developed following submission of the EIS, in consultation with ECC.	X	X	X	X	
	– Mitigation – Monitoring	Champion will implement the mitigation measures, follow-up, and monitoring programs and management plans outlined in Chapter 5 and summarized in Chapter 20 to minimize anticipated effects on air quality and greenhouse gas emissions.		X	X	X	
Chapter 6: Noise, Vibration and Light	– Future Work	Further vibration assessments may be carried out for specific locations where required, to determine potential vibration effects.		X	X		
	– Mitigation – Monitoring	Champion will implement the mitigation measures, follow-up, and monitoring programs and management plans outlined in Chapter 6 and summarized in Chapter 20 to minimize anticipated effects on noise, vibration and light.		X	X		
Chapter 7: Groundwater	– Future Work	Additional data collection including the completion of a pumping test and updated site water levels will be completed and incorporated into an update of the 3-dimensional to fill data gaps and improve the accuracy of the model prior to Project construction. Results will be shared with applicable regulatory authorities.	X				
	– Future Work	There is one known groundwater user located with in local study area; therefore, verification of its use and status should be completed prior to operations		X			
	– Mitigation – Monitoring	Champion will implement the mitigation measures, follow-up, and monitoring programs outlined in Chapter 7 and summarized in Chapter 20 to minimize anticipated effects on groundwater quality and quantity.		X	X	X	
Chapter 8: Surface Water	– Permitting – Monitoring	A Real-Time Monitoring Network will also be established as it was a condition of release for previous EIS. A Real-Time Monitoring Network Agreement in consultation with the Water Resources Management Division will be prepared and submitted to the Minister of Environment and Conservation to receive the minister's approval for the Real-Time Monitoring Network Agreement prior to the start of construction.	X				
	– Mitigation – Monitoring	Champion will implement the mitigation measures, follow-up, and monitoring programs outlined in Chapter 8 and summarized in Chapter 20 to minimize anticipated effects on surface water quantity, quality and sediment quality.		X	X	X	X
Chapter 9: Fish and Fish Habitat	– Permitting – Mitigation – Monitoring	Before Project activities resulting in loss of fish and fish habitat begin, the Fish and Fish Habitat Offsetting Plan will require approval by Fisheries and Oceans Canada.	X				
	– Future work	The flooding sequence of the pit that will be implemented during the Closure phase for the Project will be finalized based on site conditions, and will be driven by minimizing environmental effects to surrounding waterbodies, including Pike Lake. Champion is committed to maintaining the minimum discharge threshold in Pike Lake to mitigate environmental effects.				X	X
	– Future work – Mitigation	Concentration of selenium in Pike Lake are predicted to remain above the CCME guidelines following Project closure, which is primarily driven by seepage from the overburden stockpile. The model results identify a risk posed by the Project seepage to water quality and in turn, fish health and mortality. This risk will be adaptively managed so that such significant effects to fish health and mortality are avoided. This will be carried out via the systematic process of assessing potential effect drivers, design and implementation of an action plan to address the problem, monitoring effectiveness of action plans, and evaluation of outcomes and adjustment of the plan. The entire process is iterative with the main objective of Champion to continuously improve management practices during the Project lifecycle. Examples of action plans Champion will assess include: — Update geochemical source terms from the overburden stockpile and water quality predictions in Pike Lake with addition test results from the ongoing geochemical characterization and surface water monitoring programs during the Operation phase. — Evaluate water management alternatives to reduce selenium loadings to Pike Lake during Operations Closure and the post-closure period, including water diversions from Mills Lake instead of Duley Lake. — Determine a Site-Specific Water Quality Objective for selenium in Pike Lake	X	X	X		
	– Mitigation – Monitoring	Champion will implement the mitigation measures, follow-up, and monitoring programs outlined in Chapter 9 and summarized in Chapter 20 to minimize anticipated effects on fish and fish habitat.		X	X	X	X
Chapter 10: Vegetation, Wetlands and Protected Areas	– Mitigation	Champion will coordinate with the Town of Labrador City to designate Strawberry Lake as a Management Unit through a stewardship agreement as compensation for the loss of the Pike Lake South Management Unit.	X	X	X	X	

Applicable EIS Chapter	Commitment Type	Commitment	Preconstruction / Permitting	Construction	Operations	Closure	Post-closure
	– Mitigation – Monitoring	Champion will implement the mitigation measures, follow-up, and monitoring programs outlined in Chapter 10 and summarized in Chapter 20 to minimize anticipated effects on vegetation, wetlands and protected areas.		X	X	X	
Chapter 11: Wildlife	– Monitoring	Targeted avifauna surveys are planned for completion in 2025. Results of the surveys will be incorporated into the follow-up and monitoring program.					
	– Mitigation – Monitoring	Champion will implement the mitigation measures, follow-up, and monitoring programs outlined in Chapter 11 and summarized in Chapter 20 to minimize anticipated effects on wildlife and wildlife habitat.	X	X	X	X	
Chapter 12: Heritage and Historical Resources	– Future Work	Conduct additional archaeological assessment for areas of archaeological potential in advance of the Construction phase of the Project.	X				
	– Mitigation	Develop and implement an "Accidental Discovery of Artifact or Human Remains" protocol for the Project. — The protocols will be developed with direct input from the Provincial Archaeology Office and local Indigenous communities. — Protocols will include orientation and training for construction personnel, points of contact and lines of communication in case of accidental discovery, and descriptions of potential mitigation measures, including but limited to avoidance and protection or full archaeological mitigation. — The developed protocols will be included in the Environmental Protection Plan for the Project		X	X	X	
	– Mitigation – Monitoring	Champion will implement the mitigation measures, follow-up, and monitoring programs outlined in Chapter 12 and summarized in Chapter 20 to minimize anticipated effects on heritage and historical resources.	X	X	X	X	
Chapter 13: Indigenous Land and Resource Use	– Future Work	Champion will continue to share, consult, and engage with Indigenous groups on land and resource use, Project information, updates, and ongoing/planned activities. This includes undertaking discussions of issues and potential means of addressing them as outlined in the Kami Engagement Plan (Annex 5G)	X	X	X	X	
	– Mitigation – Monitoring	Champion will implement the mitigation measures, follow-up, and monitoring programs outlined in Chapter 13 and summarized in Chapter 20 to minimize anticipated effects on Indigenous land and resource use.	X	X	X	X	
Chapter 14: Other Land and Resource Use	– Future work	Champion has committed to rebuild White Wolf Snowmobile Club's snowmobile trails affected by the Project.	X	X			
	– Permitting	Champion will comply with regulations related to Protected Public Water Supply Areas, including appropriate permitting such as "Application for a Permit to Develop in a Protected Public Water Supply Area/Wellhead Protected Water Supply Area."	X				
	– Future Work	Champion will continue to engage with cabin owners through the Kami Working Group to discuss mitigations, including applicable compensation where appropriate.	X	X			
	– Future Work	Champion will continue to engage with the Labrador West Alliance, and Town Councils of Labrador City and Wabush regarding municipal zoning and permitting requirements, including use of areas zoned for non-mining uses, as well as relevant provincial authorities regarding any provincial interests (e.g., Provincial Park Reserve, dump sites/dump site buffers) potentially affected by the Project.	X				
	– Permitting – Future Work	Champion has committed to preparing a Transportation Impact Assessment and Traffic Management Plan prior to construction.	X				
	– Mitigation – Monitoring	Champion will implement the mitigation measures, follow-up, and monitoring programs outlined in Chapter 14 and summarized in Chapter 20 to minimize anticipated effects on Other land and resource use.	X	X	X	X	
Chapter 15: Economy and Employment	– Future Work	Champion commits to developing charter flight routings that consider transportation to Indigenous communities.		X	X		
	– Future Work	A Workforce and Employment Plan will be prepared prior to construction.	X				
	– Mitigation – Monitoring	Champion will implement the mitigation measures, follow-up, and monitoring programs outlined in Chapter 15 and summarized in Chapter 20 to minimize anticipated effects and enhance potential benefits on Economy and Employment.	X	X	X	X	
Chapter 16: Services and Infrastructure	– Future Work – Mitigation	Champion is committed to ongoing work with the Labrador West Alliance, a Regional Working Group of mining companies, municipalities, provincial, and federal government agencies, and the Labrador West Chamber of Commerce to help address common issues, such as labour supply, health care service capacity, transportation access and housing / accommodations, which could include: • Coordination with childcare service providers to notify them of the potential increase in demand • Coordination with local health care providers and relevant government agencies to notify them of the Project and the potential increases in population associated with the Project workforce • Coordination with community organizations to explore opportunities with affected organizations • Monitoring adverse effects on flight availability and cost • Managing the demand on housing and accommodation, with the priority to make more housing available over time to increase the potential for local employment opportunities • Creating new residential lots to accommodate population growth	X	X	X	X	
	– Mitigation	Champion will coordinate with the Towns of Labrador City and Wabush throughout construction and operations to monitor concerns and implement the Waste Management Plan.	X	X	X		
	– Mitigation	Champion will coordinate with the Towns of Labrador City and Wabush to provide advance notice of any increase in demand for public infrastructure, to avoid service disruptions, and enable expansion of infrastructure to support additional population associated with the Project.	X	X	X		

Applicable EIS Chapter	Commitment Type	Commitment	Preconstruction / Permitting	Construction	Operations	Closure	Post-closure
	– Mitigation	Champion will work with Newfoundland and Labrador Hydro to avoid adverse effects on the existing power supply.	X	X	X		
	– Mitigation	Champion will engage with industry, rail operators and relevant government agencies (if necessary) to avoid or mitigate potential effects to existing railway users.	X	X	X		
	– Mitigation	Champion will coordinate with police and ambulance services in advance of the Project to notify them of Project schedule and potential population growth to enable additional resources to be assigned to police and ambulance services, if warranted.	X				
	– Future Work – Mitigation	Champion will manage the demand on short-term accommodation providers through the Workforce and Employment Plan, which will include ongoing coordination with short-term accommodation providers and other industry partners to monitor demand on existing facilities and to identify suitable accommodation alternatives if demand exceeds local capacity of facilities. The Workforce and Employment Plan will be prepared following the updated Benefits Agreement and Gender Equity and Diversity Plan.		X	X	X	
	– Mitigation – Monitoring	Champion will implement the mitigation measures, follow-up, and monitoring programs outlined in Chapter 16 and summarized in Chapter 20 to minimize anticipated effects on services and infrastructure.		X	X	X	
Chapter 17: Community Health and Well-being	– Mitigation – Monitoring	Champion will implement the mitigation measures, follow-up, and monitoring programs outlined in Chapter 17 and summarized in Chapter 20 to minimize anticipated effects on community health and well-being.		X	X	X	
Chapter 18: Accidents and Malfunctions	– Mitigation – Monitoring	Champion will implement the mitigation measures, follow-up, and monitoring programs outlined in Chapter 18 and summarized in Chapter 20 and summarized in Chapter 20 to minimize anticipated effects on VECs from accident and malfunction scenarios.		X	X	X	
Chapter 19: Effects of the Environment on the Project	– Mitigation – Monitoring	Champion will implement the mitigation measures, follow-up, and monitoring programs outlined in Chapter 19 and summarized in Chapter 20 and summarized in Chapter 20 to minimize anticipated effects of the environment on the Project.		X	X	X	
Chapter 20: Environmental Management, Monitoring and Follow-Up	– Future Work	In the next engineering phases, the dam classification will be validated with a numerical dam break analysis defining the inundation areas, accounting people at risk and environmental loss in more detail.	X				
	– Future Work	The Environmental Protection Plan will be submitted by Champion subsequent to the completion of the EIS, and prior to the initiation of Construction phase. A separate EPP will be prepared for the Operations phase of the Project	X				
	– Future Work	The Adaptive Management Plan, which pertains to the Operations phase of the Project and includes details on its process and application, will be prepared and completed following the submission of the EIS	X				
	– Future Work	Champion will update the conceptual EEMP following consultation with applicable regulatory agencies, prior to construction.	X				
	– Future Work	The management plans provided in the EIS will be refined as Project design progresses, where warranted, ahead of construction.	X				
Chapter 22: Engagement	– Future work	Champion is committed to seeking free, prior and informed consent (FPIC) of Indigenous groups with recognized rights.	X	X	X	X	
	– Future work	Champion has proposed consultation agreements to each Indigenous group to meet Newfoundland and Labrador's Consultation Policy on Land and Resource Development Decisions.	X				
	– Future work	Champion will continue to engage with public stakeholders and Indigenous groups through the Kami Engagement Plan throughout the Project phases to address concerns that are been raised.	X	X	X	X	
	– Future work	Champion is committed to working with provincial regulators and will provide regular updates throughout the Project life cycle regarding engagement activities with Indigenous groups. Champion is also willing to provide opportunities to facilitate provincial government participation during Kami Engagement Plan activities with Indigenous groups.	X				

CCME = Canadian Council of Ministers of the Environment; EIS = Environmental Impact Statement; GHG = greenhouse gas; SFE = shake flask extraction; TMF = tailings management facility; VEC = Valued Environmental Component.


Kami
Kamistiatusset
Mining
Project

24. Assessment Summary and Conclusions

This Environmental Impact Statement (EIS) documents the results of the environmental assessment of the Kamistiatusset (Kami) Iron Ore Mine Project (the Project) proposed by Champion Kami Partner Inc. (Champion). This EIS has been prepared to satisfy the requirements of the *Environmental Assessment Regulations, 2003* under the *Environmental Protection Act* and the EIS Guidelines (Government of NL 2024). A table of concordance between this EIS and the EIS Guidelines is presented in the Executive Summary. **Chapter 24, Assessment Summary Conclusions** summarizes the overall findings of the environmental assessment.

24.1 Champion and the Kami Mining Project

Champion, through its subsidiary Québec Iron Ore Inc, owns and operates the Bloom Lake Mining Complex located approximately 13 km north of Fremont, Québec. The Bloom Lake Mining Complex is an open pit mine with two concentration plants powered mainly by renewable hydroelectric power. With a production capacity of 15 million wet metric tonnes (wmt) pet year, Bloom Lake produces high-grade 66.2% iron ore concentrate and has demonstrated the ability to produce 67.5% direct reduction quality concentrate. Champion is currently upgrading half of the mine's capacity to produce direct reduction quality pellet feed with up to 69% iron. Due to its high purity and low contaminants, Bloom Lake's iron ore retains a premium over the Platts IODEX 62% iron benchmark. The concentrate is transported to Sept-Îles, Québec, for global distribution, including to markets in Aisa, Europe, the Middle East, and North America.

The purpose of the Project is to develop the high-purity iron ore deposits of the Kami Iron Ore Mine. Once mined, the high-purity iron ore will be refined to produce high-purity iron ore concentrate suitable for export to international steel markets. In June 2024. This decision followed those of Newfoundland and Labrador (NL; November 2023) and of Québec (January 2024) which have also identified high-purity iron ore on their respective lists. This recognition highlights that high-purity iron is a rare solution for decarbonizing the steel industry, which accounts for nearly 10% of global carbon emissions. The Labrador Trough hosts one of the largest resources of high-purity iron globally, creating an exceptional opportunity for NL to become a global sustainable leader in the green steel supply chain.

Champion's objective for the Kami Mining Project is to produce direct reduction quality iron ore which enables the steelmaking transition towards direct reduced iron and electric arc furnaces, which produce steel without the use of coal and can contribute to reduced emissions of approximately 50% when compared to traditional blast furnace or basic oxygen furnace production.

The Project was originally proposed by the Alderon Iron Ore Corporation (Alderon) and underwent a provincial and federal Environmental Assessment (EA), under the framework of the provincial *Environmental Protection Act* and the former federal *Canadian Environmental Assessment Act*. Alderon submitted an EIS (the previous EIS) to the joint provincial-federal EA Committee in 2012. The previous EIS underwent review by the EA Committee and was also made available for public and Indigenous review. Comments from the EA Committee, the public, and Indigenous communities and organizations were considered prior to the federal and provincial governments making a determination about the potential environmental effects of the Project. Following additional rounds of comments and amendments to the previous EIS, the Project was released from the EA process in 2014 and both levels of government advised that the Project could proceed. The former provincial Minister of Environment and Conservation stated that under the authority of Section 67(3) (a) of the provincial *Environmental Protection Act*, the Lieutenant-Governor in Council had released the Project, subject to several conditions.

Since acquisition of the Project in 2021, Champion has completed a thorough review of the proposed mitigation measures; monitoring requirements, commitments, and conditions outlined in the previous EIS; the Canadian Environmental Assessment Agency Comprehensive Study Report; and the conditions outlined in the Lieutenant-Governor in Council's 2014 EA release. Champion has addressed several conditions of the previous EIS release, which has resulted in updates and improvements to the design of the Project. Many of the design improvements are related to updates to the water management infrastructure, following completion of additional field investigations and updates to the conceptual hydrogeological model, which predicted increased hydraulic conductivity estimates and groundwater inflows to the Rose Pit. The additional water management infrastructure mitigates potential effects to the aquatic environment that were not identified in the previous EIS, reducing uncertainty and environmental risk associated with the Project.

The Project will involve the construction, operation, and eventual closure of an open pit high-purity iron ore mine and supporting infrastructure. The mine operation is expected to produce an average of 8.6 million tonnes of iron ore concentrate annually over a 26-year mine life. High-purity iron ore concentrate will be transported by rail to the deep-water industrial docks in Pointe-Noire in Sept-Îles, Québec, for international shipping. The Project site is located wholly within Labrador; no activities associated with the Project Site will take place in Québec. The Project has been designed to ensure safety for the public and workers and to comply with applicable regulatory requirements and industry best management practices. All Project components will be constructed,

operated, and closed in accordance with governing federal, provincial, and municipal regulations, as well as industry regulations and standards. The Project includes construction, operation, and closure of the following components:

- an open pit (referred to as the Rose Pit)
- ore processing infrastructure, including the crusher, conveyors, ore stockpiles, the process plant, and a concentrate load-out
- waste management infrastructure, including an overburden stockpile, mine rock stockpile, and tailings management facility
- water management infrastructure proposed to collect contact and non-contact water, including dams, dikes, and collection ponds
- supporting infrastructure, including access roads, workforce accommodations, a mine service area, freshwater pumping stations, an emulsion and explosion production plant and explosive storage, a crushing plant, transmission lines for local site distribution and telecommunications services
- transportation corridors, including access roads and a railway corridor that includes a spur line to connect the mine site to the Québec North Shore & Labrador Railway

An alternatives assessment compared various feasible options to determine those that best meet environmental, technical, economic, and social criteria. The proposed Project design and the integration of key components and infrastructure reflect evaluations made during this assessment. Champion would continue to review alternative approaches throughout the Project lifespan; optimization of alternatives would be pursued through Project design, planning, and operations, with the intent that any potential design iterations and mitigations align with the assumptions considered within the EIS.

A more detailed description of Champion, the Project and the assessment of alternatives are provided in **Chapter 1, Introduction, Chapter 2, Project Description and Chapter 3, Project Alternatives.**

24.2 Effects Assessment

This EA has been used as a planning tool to ensure that the Project was considered in a careful and precautionary manner to avoid or mitigate possible environmental effects. **Chapter 4, Effects Assessment Methodology** outlines the general approach and methods applied for the Project and cumulative effects assessments that were designed to meet the EIS Guidelines for the Project.

Valued environmental components (VECs) were identified as relevant and important to the environmental assessment based on regulatory requirements and engagement with Indigenous groups and stakeholders. The VECs included atmospheric environment VECs (air quality, climate, noise, vibration, and light); aquatic environment VECs (groundwater, surface water [composed of 3 VECs], and fish and fish habitat); terrestrial environment VECs (vegetation, wetlands, protected areas and wildlife [composed of 15 VECs]); and social environment VECs (heritage and historical Resources, Indigenous land and resource use, other land and resource use, economy and employment, services and infrastructure, and community health and well-being). The selected VECs reflect the key issues raised by regulators, Indigenous groups, and stakeholders through consultation with Champion and the EIS Guidelines.

The assessment included a characterization of the existing conditions within the spatial boundaries of each VEC, including a discussion of the influences of past and present physical activities on the VECs, leading to the current conditions. The assessment followed standard EA methods for describing Project interactions with each of the VECs and determining the potential environmental effects, including areas of federal jurisdiction, associated with the Project for the Construction, Operation and Maintenance, Closure phases. The assessment also considered a known reasonably foreseeable developments (RFDs) and physical activities with potential residual effects that could overlap spatially and temporally with the Project's residual environmental effects to VECs. The cumulative effects assessment used publicly availably information (e.g., Project Registrations or EIS reports), to describe the environmental effects of RFDs to VECs.

The environmental effects assessment used a precautionary approach, and conservative assumptions have been made, so that potential adverse effects are generally overestimated rather than underestimated. Mitigation and environmental protection measures have been identified to reduce or eliminate adverse environmental effects, and the residual Project and cumulative effects have been characterized including a determination of their significance.

The results of the residual Project and cumulative effect assessments of VECs for the atmospheric, aquatic, terrestrial and social environments are provided in the following subsections. The EIS also included an assessment of accidents and malfunctions and effects of the environment on the Project, which are also summarized below. This encompasses Chapters 5 to 19 of the EIS.

24.2.1 Atmoshperic Environment

24.2.1.1 Air Quality and Climate (Chapter 5)

24.2.1.1.1 Air Quality

The potential effects of the Kami Project on air quality were assessed by modelling emissions and the dispersion of contaminants of concern during Operations within the local study area (LSA). Emission estimates were derived from established sources, including the United States Environmental Protection Agency's AP-42 emission factors, and dispersion modelling followed provincial guidelines (Government of NL 2012; US EPA 1995).

Effects are anticipated to be greatest during the Project Operations phase, and mitigation measures were proposed to reduce these effects. Maximum ground-level concentrations of total particulate matter and particulate matter with a mean aerodynamic diameter of 10 microns or smaller at sensitive receptors within the vicinity of the Project are predicted to be above the NL Ambient Air Quality Standards. These exceedances occur, at the maximum predicted cabin receptor, Duley Lake South, and Fermont. The concentrations above the NL Ambient Air Quality Standards occur infrequently at the maximum predicted cabin receptor and Fermont because the coarse particulates disperse with increased distance from the Project. Champion is also proposing to implement a compensation program for cabin owners which will reduce the magnitude of the predicted effects. The main contributors to the ground-level concentrations of particulates in the vicinity of the Project are the unpaved haul roads. No exceedances of the NL Ambient Air Quality Standards are predicted for particulate matter with a mean aerodynamic diameter of 2.5 microns or smaller, nitrogen dioxide, sulfur dioxide, carbon monoxide, and metals at the cabin or communities. As predicted effects are anticipated to be infrequently above the NL Ambient Air Quality Standards, **no significant effect** is predicted. Potential cumulative effects with identified RFDs, specifically the Scully Lake Tailings Impoundment Project, are unlikely to contribute to the predictions of contaminants of concern from the Project; therefore, **no significant cumulative effect** is predicted. A monitoring program for contaminants of concern will be implemented before construction and maintained throughout all project phases to verify model predictions and guide further mitigation if needed.

The previous EIS also concluded that residual effects on air quality would not be significant, although it acknowledged that cabins at the southern end of Duley Lake could be affected by particulate matter. A comparison of residual effects between the previous EIS and the current EIS shows consistent characterizations in direction, extent, duration, frequency, reversibility, and context. However, the magnitude of effects is now considered higher for total particulate matter and particulate matter with a mean aerodynamic diameter of 10 microns or smaller due to updated modelling based on maximum ground-level concentrations near the Project boundary, whereas Alderon's assessment focused on community receptor levels.

A residual cumulative effects analysis was conducted to determine the potential effects of the Project and RFDs on air quality. RFDs within regional study area (RSA) were considered to result in potential residual cumulative effects assessment to air quality. The cumulative assessment results found that **no significant cumulative effects are expected** to result from these RFDs when combined with the effects from the Project on air quality. In addition to human activities, climate change and related effects (e.g., extreme weather, increased frequency and intensity of extreme weather events, wildfires) may contribute cumulatively to air quality. Climate change was considered qualitatively in the assessment of cumulative effects to air quality. Because of the uncertainty in direction and magnitude, it was conservatively assumed that climate change would have an adverse cumulative effect on air quality. The overall conclusion of this assessment is similar to the previous EIS, as the residual Project effects and cumulative effects were concluded to be likely not significant. However, updated air quality dispersion modelling (Appendix 5A) and effect assessment has reduced uncertainty by updating background concentrations, increasing the level of confidence in effect predictions and assessment conclusions.

24.2.1.1.2 Climate

The Project greenhouse gas (GHG) estimates demonstrate that the current Project Scope 1 GHG emissions intensity is significantly lower than the proposed project in the previous EIS. Average annual Project GHG emissions would be less than 1% of the 2022 provincial annual total GHG emissions and approximately 0.01% of the 2022 federal annual total GHG emissions. Considering the provincial outlook to 2030, where GHG emissions targets are 30% below 2005 levels, the average Project GHG emissions would continue to contribute less than 1% of provincial GHG emissions at the 2030 target. Given the low contribution of the Project to the provincial totals, NL would be expected to be capable of maintaining the ability to reach its climate change commitments through advancing technology to support fuel switching and energy efficiency. This Project also serves as a good example for NL on implementing advanced technology in industry by utilizing electrification for material movement (in-pit crushing and conveyance for mine rock), where the industry standard is to use traditional hauling methods based on fossil fuel combustion. To this end, the residual effects from the Project to the climate VEC are determined to be **not significant.**

A residual cumulative effects assessment was not completed for the climate VEC, as a residual cumulative effects assessment for the climate VEC is implicitly included in the residual Project effects analysis by nature of the effects of GHG emission. The residual Project effects analysis already considers the cumulative effects of historical, existing, and future projects through comparison to provincial and federal emissions levels and the continued ability for Canada to reach climate change commitments in form of emission reduction targets; therefore, the residual cumulative effects analysis is out of scope and is already included in the residual Project effects analysis that provides the necessary information for the provincial government to consider the Project relative to future development.

The Project would result in increased GHG emissions compared to current sector, provincial, and federal totals during all Project phases. Based on the annual estimates of Project GHG emissions, it is anticipated that the Project would be required to report its emissions under the provincial *Management of Greenhouse Gas Act* (MGGA) and Government of Canada Greenhouse Gas Reporting Program. The Project would also be subject to GHG emission reduction targets under MGGA, and required to develop a best available control technology study, as outlined in Section 12.1 of the MGGA at the EIS stage. The best available control technology study is provided in technical support document (TSD) IV of this EIS.

24.2.1.2 Noise, Light, and Vibration (Chapter 6)

24.2.1.2.1 Noise

Noise effects were assessed within the LSA by establishing identified points of reception that are expected to be used for noise-sensitive uses in the future (points of reception, e.g., permanent cabins, recreational cabins, recreational vehicle campsites, and low-density residential dwellings).

The assessment of potential Project effects on noise considered the potential effects that could occur during both the Construction and Operations phases, when the greatest effects are expected as they relate to noise. During the Construction phase, noise levels are within Health Canada's nighttime criteria for sleep disturbance (i.e., 45 dBA) and daytime criteria for speech comprehension (i.e., 55 dBA) at the representative points of reception. It also indicates that exceedances of Health Canada's change in % highly annoyed criteria may occur at certain representative points of reception within the LSA. During the Project Operations phase, noise levels are expected to be at or below Health Canada's nighttime criteria for sleep disturbance (i.e., 40 dBA) at the representative points of reception. It also indicates that Health Canada's change in % highly annoyed is expected to be at or below the criteria at the representative points of reception within the LSA.

For the Construction phase, the magnitude in the current study was conservatively predicted to be moderate, short-term and periodic, and the residual effect was predicted to be **not significant**. For the Operations phase, as the magnitude of the residual effect on noise was assessed to be moderate, the duration to be medium-term and the frequency of the effect was assessed to be continuous, the residual effect is predicted to be **not significant** during Project Operations.

The noise cumulative effects assessment, the magnitude of the residual cumulative effect on noise was assessed to be moderate, the duration to be short-term and the frequency of the effect was assessed to be periodic and predicted to be **not significant**. For the Operations phase, as the magnitude of the residual cumulative effect on noise was assessed to be moderate, the duration to be medium-term and the frequency of the effect was assessed to be continuous during Project Operations, the residual effect is predicted to be **not significant** during Project Operations due to the consideration of RFDs based on this noise assessment.

There is agreement between the residual environmental effects characterization completed for the previous EIS and the current EIS. The previous EIS also concluded that residual effects on noise would not be significant. The predictive modelling completed for noise levels has increased the level of confidence in assessment predictions.

24.2.1.2.2 Vibration

Potential effects from the Project on vibration were assessed within the vibration LSA. Vibration estimates for the Project were calculated using published vibration attenuation models such as those from the International Society of Explosives Engineers (ISEE 2016), the United States Federal Transit Administration (FTA 2018) and Fisheries and Oceans Canada (Wright and Hopky 1998). Ground vibration levels as well as air and water overpressure were predicted using those models. As the province of NL does not have regulations or guidelines for the assessment of environmental vibration from industrial and/or mining facilities, federal, provincial and municipal regulations and/or guidance for vibration from other regions was considered applicable for mining projects. The limits provide within these regulations and/or guidance were compared with the vibration levels calculated using the attenuation models described within this study

The magnitude during construction in the current study was conservatively determined to be moderate based on the available information and the proposed mitigation measures. The vibration levels are expected to increase the most during blasting activities. The magnitude of the residual effects from Project Construction vibration is predicted to be moderate, because the vibration levels are expected to cause an increase over baseline but remain below the limits described within this assessment. As the magnitude

of the residual effect on vibration was assessed to be moderate and the frequency is periodic, the residual effect is predicted to be **not significant.** As the magnitude of the residual cumulative effect on vibration was assessed to be moderate and the frequency of the effect was assessed to be periodic during Project Construction and Operations, the residual cumulative effect was predicted to be not significant.

There is agreement between the residual environmental effects characterizations completed for the previous EIS and the current EIS, with the exception of magnitude. The previous EIS also concluded that residual effects on vibration would not be significant.

24.2.1.2.3 Light

Potential effects from the Project on light were assessed qualitatively within the LSA. Lighting from the Project, including from mobile equipment and fixed lighting, were compared to the baseline values to assess residual effects from the Project. A change in light levels may be perceptible at times at points of reception but applicable light trespass and sky glow Commission Internationale de l'Éclairage new zone criteria are expected to be met for Project Construction and Operations.

The magnitude in the current study was determined to be moderate based on the available information and the proposed mitigation measures, which are less restrictive than those proposed for the previous EIS. As the magnitude of the residual effect on light was assessed to be moderate and the frequency of the effect was assessed to be periodic during Project Construction and Operations, the residual effect is predicted to be **not significant.** As the magnitude of the residual cumulative effect on light was assessed to be moderate and the frequency of the effect was assessed to be periodic during Project Construction and Operations, the residual cumulative effect was predicted to be **not significant.**

The previous EIS also concluded that residual effects on light would not be significant, and there is agreement between the residual environmental effects characterization between the previous EIS and the current EIS, with the exception of magnitude during Construction.

There is agreement between the residual environmental effects characterizations completed for the previous EIS and the current EIS, with the exception of magnitude. The previous EIS also concluded that residual effects on light would not be significant.

24.2.2 Aquatic Environment

24.2.2.1 Groundwater (Chapter 7)

Potential effects from the Project on groundwater were assessed by developing an updated 3-dimensional numerical groundwater flow model, which addressed conditions of release of the previous EIS (TSD V). The updated model led to the conclusion that much of the dewatering and subsequent lowering of water levels during the Operation phase was related to dewatering through fault zones in the Rose Pit area, and that these faults may be hydraulically linked to surface water bodies such as Pike Lake, which would provide a consistent hydraulic gradient to drive groundwater into the pit. Due to the local geology of the area, including the presence of fault zones in the footprint of the pit, a large amount of infiltration was predicted to occur that was not forecasted in the previous EIS. This, in turn, enabled the need to assess and design infrastructure with incremental storage capacity and effluent volume, which is presented in Chapter 2, Project Description and TSD II (Water Management Infrastructure Design Report)

Upon completion of the groundwater effect assessment scoping, characterization of the existing environment, effect pathway screening, residual Project effect analysis, it was determined that of the two measurable parameters identified and used for the groundwater VEC assessment (i.e., changes in groundwater quantity and quality), the only residual effect will be that of changes to groundwater quantity during the Operations phase of the Project. Effects to groundwater quality were determined to be a negligible effect pathway.

Several potential residual effects related to groundwater quantity were assessed, specifically the primary effects of mine operations that involve the dewatering of the open pit mine and groundwater inflow from nearby aquifers and surrounding surface water bodies. During the Construction phase, water levels will decline as the overburden is removed, and the effects are expected to be limited to the LSA and considered to be negligible. During the operations and maintenance phase, the open pit mine will lower the water levels in the surrounding overburden and bedrock extending approximately ~1 km from the mine. Water levels are expected to lessen with magnitude the farther away from the Project. There is one known groundwater user located within LSA (located on the southwest shore of Duley Lake); therefore, verification of its use and status should be completed prior to operations. Options to reduce risk to the user would be to provide an alternative water supply of the same quantity and quality or to provide a make-good agreement. As a result of the theoretic water level lowering, small base flow reductions in nearby streams should be balanced by the open pit mine discharge back into the hydrogeologic system. Following mine closure and reclamation, the mine pit will be flooded to equilibrium, resulting in pre-mine water table conditions, reversing the effect during Operations. The residual effect on groundwater quantity due to pit dewatering during Operations is expected to not be significant, once monitoring and mitigation and measures are implemented effectively.

During Construction and Operations, changes in groundwater levels are expected to be local in scale, and non-existent following Closure. Following mine closure no residual effects are anticipated on groundwater resources. The residual effect on groundwater quantity due to pit dewatering during Operations is expected to be **not significant**, once monitoring and mitigation and measures are implemented effectively.

The Project's environmental effect on groundwater resources is estimated to not affect water supply or discharge potential of other known Projects or activities within the RSA. The residual cumulative effects from past, present and potential future projects combined with the current Project's effects to groundwater are predicted to be **not significant**.

The previous EIS had similar conclusions, as all residual effects associated with groundwater quantity and quality were predicted to be low in magnitude and not likely to be significant. However, it should be recognized that the previous effects assessment was not based on the results of the updated hydrogeological modelling (TSD V). To this end, the updated hydrogeological modelling and effect assessment has reduced uncertainty in the hydrogeological environment and increased confidence in effect predictions.

24.2.2.2 Surface Water (Chapter 8)

The surface water chapter assessed three VECs: surface water quantity, surface water quality and sediment quality. Based on the results of the hydrogeological model which resulted in the need for additional water management infrastructure, a site-wide water balance and water quality model (TSD VI) was completed to inform the site water management strategy and to predict concentrations of contaminants in the receiving environment from Project effluent. The site-wide water balance and water quality model was used to inform the assessment of the surface water quantity and surface water quality VECs.

The assessment of surface water quantity focused on predicting changes in streamflows and lake levels across the LSA throughout the Project's lifespan, as well as future conditions. While at some watersheds of local streams (watercourses), predicted net change to surface water quantity (flows, discharges, surpluses) exceeded ±10%, the net change to Duley Lake outlet discharges, that represents the end point of the LSA, was predicted to be within ±10% during the Project lifespan. The net change to the flows at the end-of-mine (Closure phase), especially considering that the net change to discharges at the Duley Lake outlet, was considered to be within the natural variation of flows. The Project effects on local watersheds will be managed and mitigated using water management infrastructure (i.e., water diversion from Duley Lake).

Water quality contaminants were predicted to generally increase above the existing/background concentrations during Project phases for all flow scenarios; however, the concentrations were predicted to be generally below Project guidelines/thresholds in the receiving environment downstream of the Project LSA in the base case. Within the LSA, only two parameters (cobalt and selenium) were predicted to seasonally increase above Canadian Council for Ministers of the Environment (CCME) guidelines/thresholds during Operations and then return below water quality guidelines/thresholds during the Closure phase and Post-closure period, with the exception of selenium that persisted during the Post-closure period in Pike Lake. Only one contaminant of potential concern (cobalt) at the Duley Lake outlet (the end point of LSA) was predicted to exceed seasonally towards the end of Operations; the exceedance was predicted to be reversible and not persistent beyond Operations. Site-specific water quality objectives (SSWQOs) for selenium for Duley Lake (TSD VII) and cobalt (TSD VIII) were developed to provide protection against long-term effects on aquatic life under site-specific conditions predicted for all phases of the Project. Predicted concentrations of cobalt and selenium were also compared to SSWQOs. Though the predicted concentrations of selenium and cobalt exceeded CCME guidelines (as discussed above), these were found below their respective SSWQOs during all Project phases, noting that selenium SSWQO for Pike Lake has not been developed.

Direct changes to sediment quality due to Project activities were assessed to be negligible in effect pathway screening. However, sediment quality could be affected due to changes in water quality; therefore, the residual Project effect assessment of sediment quality was also completed qualitatively and in a semi-quantified manner in relation to predictions of water quality. Semi-quantified assessment of changes to sediment quality parameters with CCME guidelines/thresholds at Pike Lake, Duley Lake and Duley Lake outlet showed that the sediment quality parameters (e.g., arsenic, cadmium, chromium, and zinc), whose background concentrations exceeded CCME Interim Sediment Quality Guidelines, would generally exceed CCME Interim Sediment Quality Guidelines during Project Operations; however, the predicted concentrations would generally return to near/below background conditions during the Closure phase and Post-closure period. Only zinc (at Pike Lake in far future) and copper (at Duley Lake in Construction and Operations phases and Duley Lake outlet in Project lifespan and far future) were the additional new parameters that exceeded CCME Interim Sediment Quality Guidelines due to Project residual effects. However, sediment quality baseline condition (Annex 2A) and historical results (Stantec 2012) have also shown the exceedances of zinc and copper above the CCME Interim Sediment Quality Guidelines (but not the CCME Probable Effect Level) in waterbodies/lakes within LSA. Based on the assessment, the residual Project effects on sediment quality constituents are expected to be low and reversible as most parameters were predicted to return to near/below background conditions during the Closure phase and Post-closure period (far-future) and none exceeded CCME Probable Effect Level.

Based on the assessment results, planned mitigation and environmental protection measures, and environmental monitoring and adaptive management, the overall residual Project effects on surface water quantity, surface water quality and sediment quality were assessed to be **not significant**.

A residual cumulative effects analysis was conducted to determine the potential effects of the Project and RFDs on surface water. RFDs within RSA were evaluated to determine if spatial and temporal overlap exists with the Project effects to surface water. The cumulative assessment results found that **no significant cumulative effects** are expected to result from these RFDs when combined with the effects from the Project. In addition to human activities, climate change and related effects (e.g., extreme weather, increased frequency and intensity of extreme weather events, wildfires) may contribute cumulatively to surface water. Climate change was considered qualitatively in the assessment of cumulative effects to surface water. Because of the uncertainty in direction and magnitude, it was conservatively assumed that climate change would have an adverse cumulative effect on surface water.

The overall conclusion of this assessment is similar to the previous EIS (Alderon 2012), as the effect assessment results of the previous assessment were summarized to result in localized changes to surface water that would be low in magnitude. However, the addition of planning tools such as the Hydrogeology Model (TSD V) and Water Balance and Water Quality Model (TSD VI), and description, design and proposed implementation of environmental design features such as the water management infrastructure (Chapter 2 and TSD II) have increased the level of confidence of this assessment. The water balance and water quality modelling (TSD VI) were not completed for the previous EIS, and in absence of this modelling, the findings from the previous EIS in regards to hydrology and surface water quality are not comparable to the outcomes of the updated assessment for potential residual effects to surface water.

24.2.2.3 Fish and Fish Habitat (Chapter 9)

Effects on fish and fish habitat will be compensated for through the Offsetting Plan (TSD IX: Fish and Fish Habitat Offsetting Plan), including designed mitigation measures, controls, and treatment of surface water contaminants, and a water quality monitoring program for surface and subsurface water, which will adhere to the MDMER standards for water discharge. While the predicted loss of fish habitat is considerable, significant adverse effects on fish and fish habitats are unlikely if the above plans and procedures are followed, including the planned fish habitat offsetting measures on the St. Lewis River presented in the Fish and Fish Habitat Offsetting Plan, which is intended to meet the requirements for offsetting under Section 35 of the *Fisheries Act.*

Fish loss due to direct effects such as the excavation of Rose Pit will be mitigated through various means, including fish rescues. Fish rescue methodology is well established and has been proven to be effective. Despite the potential for some fish to be missed or injured/killed during handling, the number of fish lost this way is expected to be negligible for the overall population.

As mentioned above, no species of conservation interest has been identified within the RSA. While the loss of individual species of conservation interest could be considered significant, depending on the species in question, none are known to exist within the Project area.

Fish health is most likely affected by the changes in water chemistry that the effluent release and seepage will have on the receiving environment and fish populations. With the exception of Pike Lake for selenium, SSWQOs for cobalt and selenium were developed for waterbodies/watercourses where CCME guidelines are currently predicted to be exceeded.

SSWQOs for selenium for Duley Lake (TSD VII) and cobalt (TSD VIII) were developed to provide protection against long-term effects on aquatic life under site-specific conditions predicted for all phases of the Project. Predicted concentrations of cobalt and selenium were also compared to SSWQOs. Though the predicted concentrations of selenium and cobalt exceeded CCME guidelines, these were found below their respective SSWQOs during all Project phases, noting that selenium SSWQO for Pike Lake has not been developed.

While cobalt and selenium concentrations are expected to return to baseline levels after various Project phases in each model, the modelled selenium concentrations, across each of the three flow scenarios in Pike Lake are currently expected to exceed CCME guidelines. These elevated selenium concentrations are primarily a result of seepage from the overburden stockpile. The seasonality of the exceedances and the toxicological effect that this will have on fish health and fish populations are uncertain.

Champion has proposed to manage uncertainty through adaptive management. The objective of adaptive management is to identify risks and uncertainties that may result in adverse effects to the environment and develop a management plan that allows for continual improvement through review and analysis of uncertainties and risks for a project.

The model results (i.e., elevated selenium and cobalt concentrations) identify a risk posed by the Project to water quality and in turn, fish health and mortality. This risk will be adaptively managed so that such significant effects to fish health and mortality are avoided. This will be carried out via the systematic process of assessing potential effect drivers, design and implementation of an action plan to address the problem, monitoring effectiveness of action plans, and evaluation of outcomes and adjustment of the

plan. The entire process is iterative with the main objective of Champion to continuously improve management practices during the Project life cycle.

Examples of action plans Champion will assess include:

- Update geochemical source terms from the overburden stockpile and water quality predictions in Pike Lake with addition test results from the ongoing geochemical characterization program.
- Collect additional baseline data to determine a SSWQO for selenium in Pike Lake.
- Complete monitoring through the Operation phase to understand selenium loading and effects to Pike Lake.

Following the adaptive management approach and implementation of additional measures, effects to fish health as a result of the Project are expected to be **not significant.**

A residual cumulative effects analysis was conducted to determine the potential effects of the Project and RFDs on fish and fish habitat. RFDs within RSA were evaluated to determine if spatial and temporal overlap exists with the Project effects to fish and fish habitat. The cumulative assessment results found that **no significant cumulative effects** are expected to result from these RFDs when combined with the effects from the Project. In addition to human activities, climate change and related effects (e.g., extreme weather, increased frequency and intensity of extreme weather events, wildfires) may contribute cumulatively to fish and fish habitat. Climate change was considered qualitatively in the assessment of cumulative effects to fish and fish habitat. Because of the uncertainty in direction and magnitude, it was conservatively assumed that climate change would have an adverse cumulative effect on fish and fish habitat.

The previous EIS completed had similar findings; however, a notable missing piece from the previous EIS was the water balance and water quality modelling (TSD VI), which depicts the predicted increase in metals that could effect fish health. The inclusion of the model is crucial for understanding the long-term effects that fish may experience as a result of Project activities, and that additional adaptive management measures will be required to mitigate effects to fish health. In absence of this modelling, the findings from the previous EIS in regards to water quality and hydrology and their effects on fish habitat and fish health are not comparable to the outcomes of the updated assessment for potential residual effects on fish and fish habitat.

24.2.3 Terrestrial Environment

24.2.3.1 Vegetation, Wetlands, and Protected Areas (Chapter 10)

24.2.3.1.1 Vegetation

The primary effect upon vegetation for the Project is through the direct displacement (clearing) of terrestrial vegetation areas during mine site development and construction of associated infrastructure. While non-wetland vegetation communities within the site study area (SSA) will be displaced by mine development, these effects may be largely temporary and carefully planned rehabilitation activities can hasten the re-establishment of Post-closure period vegetation communities. However, non-wetland habitats located in pit areas will likely be permanently replaced by water due to the Post-closure period mine pit flooding. The potential area of direct effects associated with the mining pit and mine infrastructure development (SSA) is conservatively assumed to be 3,433 ha or approximately 10.2% of non-wetland habitat in the LSA. It is also predicted that in-direct effects from elevated dust concentrations during Operations will have observable adverse effects on vegetation communities immediately adjacent to the mine site, perhaps up to 100 m (i.e., in the LSA), resulting in a high magnitude effect. Effects are expected to be limited to the LSA and relatively small proportions of any Ecological Land Classification (ELC) type (less than 5%) within the RSA. Affected vegetation communities will recover after operations cease and the site is restored. Due to relatively small proportions of the ELC types effected in the SSA, compared to the remaining ELC areas available in the RSA it is considered that the overall effects on non-wetland vegetation communities will be **not significant**.

This conclusion is very similar to effect predictions in the previous EIS, although it should be noted that a comparison of the 2012 EIS effect estimate with the current SSA effects is complicated because of the change in ELC areas caused by the higher accuracy of the recently updated mapping. Also, the two effect areas are different as the 2012 EIS Project Development Area was only 2,377.5 ha whereas the more conservative SSA in the current assessment is 4,323 ha. When considering only the Project infrastructure, the current EIS proposes an area of 1,971 ha, compared to a larger area of 2,377 ha previously proposed for Project infrastructure in the previous EIS, reflecting how Champion has centralized the footprint of the Project. Therefore, the predicted loss of 3,433 ha of vegetation is likely an overestimate and intended to provide conservatism in the assessment.

While the Project may affect vegetation species of conservation concern and their habitats the effects are not extensive, as their habitats are well represented in the RSA and likely within the larger western Labrador region. As a result, the Project effects will not hinder the species ability to persist in the area and are therefore considered **not significant**.

24.2.3.1.2 Wetlands

The main wetland effect predicted for the Project is the displacement of wetland areas through quarrying and infilling related to mining and mining related infrastructure. The wetland areas within the SSA have a high likelihood of being permanently lost. The area of possible effects within the SSA is conservatively estimated to be 879.63 ha; however, the anticipated likely direct effect area in the Project footprint will be approximately 443 ha. There is 148.4 ha of wetland area located within the LSA which conservatively may be subject to indirect effects on surface water and groundwater and dust, but it is considered likely that the actual area of wetland effects may be closer to 15 ha. Such effects are expected to be temporary and reversable. The residual effects on wetland area and function will be offset by a commitment to the Strawberry Lake Stewardship Agreement; therefore, it is considered that the overall effects on wetlands will be **not significant**.

This conclusion is very similar to effect predictions in the previous EIS, although it should be noted that a comparison of the 2012 EIS effect estimate with the current SSA effects is complicated because of the change in ELC areas caused by the higher accuracy of the recently updated mapping. Also, the two effect areas are different as the 2012 EIS Project Development Area was only 2,377.5 ha whereas the more conservative SSA in the current assessment is 4,323 ha. When considering only the Project infrastructure, the current EIS proposes an area of 1,971 ha, compared to a larger area of 2,377 ha previously proposed for Project infrastructure in the previous EIS, reflecting how Champion has centralized the footprint of the Project. Therefore, the predicted loss of 3,433 ha of vegetation is likely an overestimate and intended to provide conservatism in the assessment. Although it should be noted that the area of directly effected wetland in the Project footprint (443 ha) has decreased compared to the Alderon assessment (572 ha) due mostly to an approximately 40% reduction in the eastern access road effects through realignment and an overall refinement of the site infrastructure design with optimized storage areas.

24.2.3.1.3 Protected Areas

The primary adverse effect is the loss of Pike Lake South management unit, totalling 610 ha which will be compensated by the designation of the Strawberry Lake management unit, with an equivalent area of 610 ha. This new protected area will maintain the regional ecological functions previously provided by the Pike Lake South management unit. The total effect footprint in Duley Lake Provincial Park will be approximately 32 ha, representing 4.2% of the park total area (763 ha) and 1.4 % of all protected areas in the RSA (2,351 ha). The measurable effects are restricted to an area far below the 20% significance threshold of total conservation areas in the RSA; therefore, the potential residual effects on protected areas are considered **not significant**.

The predicted area of effect is similar to the 2012 Alderon EIS, although access road alignment changes avoided the previous encroachment in the Jean Lake Rapids management unit but added footprint within the southwest edge of Duley Lake Provincial Park.

24.2.3.1.4 Cumulative Effects

All the identified RFDs have physical footprints outside the RSA for Vegetation, Wetlands, and Protected areas; therefore, direct effects such as area loss are not applicable. No potential interaction with surface water or groundwater within the RSA was identified. Similarly, no reasonably foreseeable effects from introduction of invasive species were identified for the RFDs within the RSA. Only dust from RFDs may migrate into the RSA airshed and become a potential source of cumulative effects, although these incidental contributions to dust effects in the LSA are predicted to be negligible, and **no residual cumulative effects** are predicted.

In addition to human activities, climate change and related effects (e.g., extreme weather, increased frequency and intensity of extreme weather events, wildfires) may contribute cumulatively to vegetation and wetland loss and alteration. Climate change was considered qualitatively in the assessment of cumulative effects to vegetation, wetlands and protected areas. Because of the uncertainty in direction and magnitude, it was conservatively assumed that climate change would have an adverse cumulative effect on vegetation, wetlands and protected areas.

24.2.3.2 Wildlife and Wildlife Habitat (Chapter 11)

The effects assessment for wildlife and wildlife habitat was informed by a comprehensive review of the previous EIS, community engagement, literature, and EIS Guidelines. This review led to the identification of 14 wildlife VECs, including representative species of the following: Species At Risk (SAR) and migratory birds, bats, woodland caribou, large mammals, furbearers, upland gamebirds, and amphibians. Some of these VECs were not explicitly considered in the previous EIS but were included in the current assessment due to updated conservation statuses, public concern, or specific inclusion in the EIS Guidelines. Several of these VECs were not explicitly considered in the previous EIS, but they were included in this EIS because (1) they were identified as a concern during the engagement process; (2) their conservation status has changed; and/or (3) they were specifically highlighted in the EIS Guidelines. The assessment considered 16 potential interaction pathways between the Project and wildlife, including biophysical factors such as air, noise, light, surface water, groundwater, vegetation, and wetlands.

The wildlife and wildlife habitat assessment concluded that no effects were predicted for harlequin duck and woodland caribou, as these species are not expected to occur within the Project study area. Negligible effects were identified for a range of pathways affecting all VECs, including increased edge habitat, linear barriers, injury and mortality from clearing (excluding amphibians [herptiles]), increased predator and public access, vehicle collisions (excluding amphibians [herptiles]), wildlife attractants, introduction and spread of invasive plants, deposition of suspended solids in emissions, sedimentation altered site drainage, and treated effluent discharge (except for woodland caribou, amphibians, and avifauna [except grouse spp.).

Residual effects were identified for habitat loss, habitat alteration, and sensory disturbance across all VECs during Construction, Operations, and Maintenance. Habitat loss estimates used the SSA to predict effects, which reflect a conservative assumption for direct effects from the Project. When considering only the Project infrastructure, the current EIS proposes an area of 1,971 ha, compared to a larger area of 2,377 ha previously proposed for Project infrastructure in the previous EIS, reflecting how Champion has centralized the footprint of the Project. Therefore, the predicted losses of habitat loss for the wildlife VECs is likely an overestimate and intended to provide conservatism in the assessment. Specific residual effects for amphibians including two-lined salamander and wood frog were also identified due to injury and mortality from clearing (during Construction); vehicle collisions and air emission effects via inhalation or ingestion (during Construction, Operations and Maintenance, and Closure), as well as treated effluent discharge (during Operations). However, these effects were assessed as **not significant**.

Following the assessment of Project effects discussed in the sections above, a qualitative assessment of potential cumulative effects was conducted for other projects and activities that have the potential to interact with the Project's residual effects. Six projects were identified that had the potential to contribute to the cumulative effects, including five mines and one road improvement project. These projects range from 13 to 60 km from the Kami Mining Project. All RFDs have physical footprints within the RSA for wildlife and wildlife habitat, which encompasses a 40 km buffer around the SSA to account for home ranges of mobile wildlife VEC. Due to their relatively low mobility, the amphibian RSA is confined to the vegetation RSA. None of the RFDs have physical footprints within the RSA for amphibians and amphibian habitat. Therefore, cumulative residual effects are not applicable to amphibians. The assessment conclusion is that potential cumulative effects with identified RFDs, specifically the Scully Lake Tailings Impoundment Project, are unlikely to contribute to predictions of contaminants of concern from the Project, and **a significant cumulative effect was not predicted**. In addition to human activities, climate change and related effects (e.g., extreme weather, increased frequency and intensity of extreme weather events, wildfires) may contribute cumulatively to wildlife habitat loss and alteration. Climate change was considered qualitatively in the assessment of cumulative effects to wildlife and wildlife habitat. Because of the uncertainty in direction and magnitude, it was conservatively assumed that climate change would have an adverse cumulative effect on wildlife and wildlife habitat.

Although specific VECs differed between the previous EIS and the current EIS, both considered species from the same guilds (i.e., SAR and migratory birds, large mammals, amphibians) and the conclusions are similar. Major exceptions include bats, which were not listed at the time of the previous EIS. The current EIS concludes the Project will have a negligible effect on bats and bat habitat. Woodland caribou also were not considered in the previous EIS, as they have not been reported in the area. However, consultation highlighted effects on caribou as a key issue. The current EIS concluded that Project activities will have a negligible effect on future caribou habitat, if caribou were to return to the area.

To further address baseline data requirements of the EIS Guidelines, Champion will be conducting additional surveys in 2025.

24.2.4 Social Environment

24.2.4.1 Heritage and Historical Resources (Chapter 12)

The assessment of heritage and historical resources evaluated potential effects on archaeological resources, built heritage, and cultural heritage landscapes. The Project may result in adverse effects on these components of the social environment, particularly during mine construction, through both direct and indirect effects.

The previous EIS concluded that no palaeontological or architectural resources were present in the Project Development Area, and Champion has confirmed these findings. Additionally, the 2014 ministerial decision did not include any conditions specific to heritage and historical resources. As such, the current effects assessment determined that no effect pathways are anticipated for heritage and historical resources, as mitigation measures for archaeological, built heritage, and cultural landscapes will be implemented prior to construction. The Cultural Heritage Screening Report confirmed that there are no built heritage resources or cultural heritage landscapes within the SSA, and no further assessment is currently recommended. However, if the SSA is expanded beyond the areas assessed in the baseline reports, additional archaeological and cultural heritage screening will be required.

Recommended next steps include conducting additional archaeological assessments in areas of potential prior to construction, and developing and implementing an "Accidental Discovery of Artifact or Human Remains" protocol. This protocol will be developed in collaboration with the Provincial Archaeology Office and local Indigenous communities, and will include training for construction

personnel, communication procedures, and mitigation strategies such as avoidance, protection, or full archaeological recovery. The protocol will be incorporated into the Project's Environmental Protection Plan.

24.2.4.2 Indigenous Land and Resource Use (Chapter 13)

The Project has undergone design changes (e.g., reconfiguration of the rail line to avoid the Wahnahnish Lake protected public water supply area) to prevent effects on other land and resource uses to the extent possible, and various mitigation measures have been identified to minimize potential effects to Indigenous Land and Resource Use.

The province of NL has a duty to consult and, where appropriate, accommodate Indigenous groups when it considers conduct that might adversely effect potential or established Aboriginal or Treaty Rights. During the previous EA, five Indigenous groups were identified by the former Canadian Environmental Assessment Agency as being potential rightsholders (i.e., having potential Aboriginal or Treaty Rights that could be adversely affected by the Project). These are:

- Innu Nation
- Innu Takuaikan Uashat mak Mani-Utenam
- La Nation Innu Matimekush-Lac John
- Naskapi Nation of Kawawachikamach
- NunatuKavut Community Council

Champion has confirmed with the NL Office of Indigenous Affairs and Reconciliation that the Indigenous groups previously identified as potential rightsholders requiring consultation in 2011 for the previous EA process remain the same.

Characterization of Indigenous Land and Resource Use in the LSA was based on a range of information sources. Given the substantial historical context relevant to this EIS, combined with the lack of updated data or additional relevant information, the sources remained unchanged from those used in the previous EIS, and have informed the reporting of Indigenous Land and Resource Use.

In engaging with the five identified Indigenous communities, Champion was advised by Indigenous communities that they disagree with NunatuKavut Community Council's assertion of Aboriginal Rights in the LSA. Champion has informed the NL Office of Indigenous Affairs and Reconciliation of the matter. During Champion's engagement process, Indigenous communities advised Champion that they could not share information on contemporary Traditional Land and Resource Use, because of ongoing land claims negotiations or disputes with the Crown on recognition of Aboriginal Rights. As a result, the only source of information on contemporary Traditional Land and Resource Use made available to Champion is the 2012 land use study prepared by NunatuKavut Community Council for the previous EIS. Champion invited all identified Indigenous groups to review the previous land and resource use information provided in the 2012 EIS and provide pertinent information for the current EA process. To date, none of the Indigenous groups have provided information in that regard. For Indigenous groups that opted out of engagement—either in the context of the prior or current EIS due to capacity constraints or other reasons—the assessment relies solely on literature reviews and publicly available data.

Given the limited available information respecting land and resource use by the identified Indigenous groups in the SSA or LSA, combined with the adoption of a conservative approach for the effects assessment, the following Project interactions with existing conditions were assumed to result in negligible effect pathways to land and resource use by any of the Indigenous groups. Consequently, they were not carried forward for residual effects or cumulative effects analysis.

- Limited Access to, and Loss of, Areas for Traditional Land and Resource Use
- Disturbances Diminishing the Quality of the Experience of Traditional Land and Resource Use
- Diminished Quality or Quantity of Harvests due to Effects on the Biophysical Environment

No residual effect pathways are anticipated for Indigenous Land and Resource Use. The previous EIS (Alderon 2012) had arrived at the same conclusion. Champion will continue to engage with the identified Indigenous groups and consider land and resource use information in Project planning, should it be made available.

24.2.4.3 Other Land and Resource Use (Chapter 14)

The Project has undergone design changes (e.g., reconfiguration of the rail line to avoid the Wahnahnish Lake protected public water supply area) to prevent effects on other land and resource uses to the extent possible, and various mitigation measures have been identified to minimize potential effects to other land and resource use. Despite this, residual adverse effects pathways

were identified for tourism and recreation, as well as harvesting land uses in the SSA through the preparation of the baseline and spatial analysis.

Residual effects such as limited access to, and loss of, areas currently used for recreation and tourism will begin in Construction and continue throughout Operations and Closure. Champion will continue to engage with White Wolf Snowmobile Club (e.g., regarding Cain's Quest snowmobile race) and recreational users regarding the intersection of the Project and recreation areas. This will include communication of Project information, updates on ongoing and planned activities and a discussion of issues and concerns and potential means of addressing them. With implementation of mitigation measures, residual effects of the Project on recreation and tourism are anticipated to be low in magnitude. During Construction and Closure, residual effects are expected to be of short-term duration, periodic in frequency with an increase in the winter months for applicable activities. During Operations, they are expected to be medium term and continuous in frequency. Residual effects will be reversible following Project Closure. Recreation and tourism in the RSA is considered resilient, as it has a moderate to high capacity to recover from disturbance, including from predicted Project-related effects.

Residual effects such as limited access to, and loss of, areas currently used for harvesting will begin in Construction and continue throughout Operations and Closure. This will continue to directly affect any harvesting that takes place within the SSA, including hunting, trapping, fishing, domestic wood-cutting and berry-picking. The overall experience of hunters, trappers and anglers may be compromised in the SSA, but these activities are also practised widely in the RSA. With implementation of mitigation measures, residual effects of the Project on harvesting are anticipated to be low in magnitude. The Project is in an area used for harvesting, but extensive alternative areas are available outside of the SSA to undertake harvesting activities; the SSA is approximately 0.03% of the RSA. Project effects on harvesting are expected to occur within the SSA (from the direct loss of the area) and the LSA (from indirect sensory disturbances).

During Construction and Closure, residual effects on harvesting are expected to be short term and periodic in frequency. During Operations, they are expected to be medium term and continuous in frequency. Residual effects will be mainly reversible following Project Closure, with access being restored and rehabilitation ongoing. Harvesting in the RSA is considered resilient, as it has a moderate to high capacity to recover from disturbance, including from predicted Project-related effects.

With mitigation and environmental protection measures, the residual environmental effects on other land and resource use are predicted to be **not significant**.

There are no spatial intersections of the Kami Mining Project and the identified RFDs, but each RFD coincides temporally with the Project. Four projects (at the Bloom Lake mine and Rio Tinto Iron Ore Company of Canada's Labrador City operations) are at existing mine sites where operations are ongoing. The remaining two projects (Route 389 improvement program and Scully Mine tailings impoundment area) include use of presently undeveloped land and thus potentially affect tourism, recreation and harvesting due to loss of access to land and/or disturbances. These two projects may contribute to cumulative effects along with the Kami Mining Project in the RSA. The loss of access to land and potential other disturbances would have minimal effects on land and resource use, as the two RFDs involve a small portion of land in the RSA and residents engage in activities over a large area. Champion will continue to engage with local stakeholders, such as municipalities and the Labrador West Alliance, to discuss potential land use conflicts and solutions. The conclusion is that potential cumulative effects of the identified RFDs and the Project's residual effects are unlikely to be greater than negligible are determined to be **not significant.**

Residents of Fermont generally undertake land and resource use activities near the community, but also in areas near or with visibility of Labrador West. Project features have been redesigned to reduce visibility from Fermont. Further, any design changes and mitigations to reduce effects on land and resource use in Labrador West will also reduce effects in Fermont.

The previous EIS had similar findings to this EIS, including no likely significant residual effects on land and resource use. Mitigations incorporated into Project design included progressive rehabilitation and working with recreational users to address Project effects.

24.2.4.4 Economy and Employment (Chapter 15)

The Project is expected to generate positive residual effects on several economic and social indicators, including gross domestic product, employment, training, contracting opportunities, and government revenues. These benefits are also expected to extend to under-represented groups in both Labrador West and NL, as well as residents and businesses in Fermont, who are expected to gain employment and procurement contracts flowing from the Project.

A Benefits Agreement/Gender Equity and Diversity Plan was signed between the Government of NL and the Kami Mine Limited Partnership in 2014 will continue to apply to the Project. Champion has committed to updating the Gender Equity, Diversity and Inclusion Plan to reflect current conditions.

These findings are consistent with the previous EIS, which also predicted no adverse residual effects on the economy and employment, but rather significant positive outcomes.

24.2.4.5 Services and Infrastructure (Chapter 16)

The Project is expected to create residual adverse effects on key community services and infrastructure including housing and accommodations, childcare, education and training, as well as healthcare. Design changes have been made to the Project to mitigate effects on services and infrastructure to the extent possible, such as the inclusion of a permanent camp to accommodate up to 600 workers for the lifespan of the Project.

Through preparation of a thorough baseline and spatial analysis, significant adverse effects were predicted for housing and accommodation, child care, education and training, and health care. These services and infrastructure are experiencing challenges meeting the demand of the existing population, and any population growth associated with the Project would increase demand and possibly lead to exceeding capacity. Although mitigation measures have been proposed, the ability for this to effectively manage or minimize adverse negative effects is limited.

Fermont also faces challenges with meeting demand for particular services and infrastructure from the current resident and non-resident population, which limits the potential for Labrador West residents to travel to Fermont to access services. Therefore, it is not likely that the Project will result in additional demand for services and infrastructure in Fermont.

Ongoing collaboration and coordination with local stakeholders, service providers, government and other operators, including participation in the Labrador West Alliance, is required to manage adverse negative effects and to adapt to changing socioeconomic conditions. The previous EIS did not find residual negative effects for services and infrastructure, which indicates the increasing awareness and demand that has been placed on these services in the time since this EIS was prepared.

24.2.4.6 Community Health and Well-Being (Chapter 17)

Community health and well-being has inherent importance to the well-being of humans, the natural environment and health and safety regulatory requirements. In the absence of mitigation, Construction and Operations of the Project could potentially affect human health and/or cause changes to air quality, noise, vibration or light, in addition to adversely affecting viewscapes. The effects of air quality, noise, vibration, and light are considered through previous assessments (Chapters 5 and 6). Therefore, the assessment of community health and well-being focused on human health and viewscapes.

24.2.4.6.1 Human Health

The Human Health Risk Assessment (TSD XI) assessed predicted potential risks to human health through exposure to potential air quality, soil quality and water quality and country foods contaminants. However, considering the assumptions and conservative approach relied upon as well as mitigation measures incorporated in Project design, only negligible residual effects were identified. The Project is not anticipated to result in any potential adverse effects to human health.

The multi-pathway assessment of the Human Health Risk Assessment evaluated potential changes to soil quality, water quality and country foods concentrations. The predicted health risks were negligible when considering the assumptions and conservative approach relied upon in the Human Health Risk Assessment. Exposure and by extension health risks due to soil, water and country foods were likely overpredicted and therefore potential health effects from the Project are not expected. The inhalation assessment predicted potential risks to human receptors for nitrogen dioxide, aluminum, manganese, silica and diesel particulate matter. Although these health risks were predicted, when the conservatism of the predictive air quality modelling and the infrequency of exceedances at the affected receptor locations was considered, the Human Health Risk Assessment concluded that potential health effects due to inhalation are not expected from the Project. As a result, no residual effect pathways for human health were identified in relation to environmental exposures of the Project. As no residual effect pathways for human health were identified, no residual cumulative effects are expected.

24.2.4.6.2 Viewscapes

Given the findings in the Visual Aesthetic Impacts Assessment (TSD X), visual effects can be minimized through mitigation. Upon implementation of the recommended mitigation measures, the Project may still have some visual effects on users of the surrounding landscape. Project visibility, from most viewing locations, will be predominately limited by establishment of vegetation on the stockpiles to help mitigate visibility. The end goal is to have the stockpiles resemble the rolling vegetated hills in the surrounding landscape. At higher elevations, such as Smokey Mountain, viewers will see much of the Project site, including the pit and areas cleared for infrastructure though at a far distance. After final rehabilitation of stockpiles, the resulting natural landscape will feature three vegetated landforms that resemble the surrounding hills and a mosaic of woodlands, grasslands and wetlands that will be in balance with the natural, industrial and development landscape patterns. Thus, while the Project may produce some effects on community health and well-being through altered viewscapes, no long-term adverse effects beyond the lifetime of the Project should be anticipated.

24.2.5 Accidents and Malfunctions (Chapter 18)

The accidents and malfunctions assessment examined a wide range of plausible scenarios beyond normal operations that could have the potential to effect the environment and public safety. These scenarios were evaluated with respect to consequence and likelihood within the context of consideration of environmental design features and mitigation measures to quantify the overall risk profile for each scenario. A total of 133 potentially hazardous situations were initially identified and screened from these three bounding scenarios were carried forward for detailed analysis and risk analysis. The assessment of these scenarios concluded that risks can largely be mitigated through engineering design and adherence to industry best practices that reduce risk associated with hazard scenarios to as low as reasonably practicable (e.g., characterized as a tolerable level of risk).

The previous EIS focused on four main accident and malfunction scenarios including a train derailment; a forest fire; a polishing pond dam failure; and a chemical release at the port facility. In contrast, the current assessment adopted a more comprehensive, risk-based approach that evaluated a broader range of potential scenarios across all Project activities and throughout the mine's life. While two scenarios from the previous EIS (e.g., train derailment and forest fire) were re-evaluated in the current assessment and again, found to post low risk, the other two (e.g., polishing pond dam failure, and chemical release at the port facility) were excluded. The polishing pond dam failure previously evaluated was not relevant to the current assessment since the pond is not part of the current Project design. The chemical release at the port facility was not considered herein, as the scenario occurrence was outside the scope of the EIS.

24.2.6 Effects of the Environment on the Project (Chapter 19)

There is potential for effects to the Project from climate hazards including extreme temperatures, major precipitation events, severe storms, high winds, drought, wildfire, snowstorms, as well as geohazards including geology, hydrogeology, and streamflow. The assessment for potential effects of the Environment on the Project also identified that physiography, permafrost, and seismicity are not anticipated to result in effects on the Project. A range of mitigation measures have been incorporated into the Project, as well as design features and operational practices that are expected to reduce the potential for effects. These include adherence to federal, provincial, and municipal regulations, as well as industry regulations and standards. In addition, the mitigation measures outlined within the Emergency Response Plan, Waste Management Plan, the Sediment and Erosion Control Plan, and Environmental Protection Plan will provide further mitigation to potential natural and climate-related hazards. With the mitigation identified for these effects, significant residual effects are not expected.

Due to the uncertainty associated with climate change, the most effective mitigation measure at this time for climate and geohazards may change in the future. Assessing the efficiency of mitigation measures is crucial for decision-making and establishing additional measures. Therefore, mitigation measures must be adapted through a continual improvement and an adaptive management plan.

With the mitigation measures outlined above, and the development of an adaptive management plan it is expected that the Project will be resilient to potential effects of the environment, including the effects of climate change.

24.3 Monitoring and Follow-up Programs and Management Plans

A monitoring and follow-up program will be implemented to verify the predicted effects, evaluate the effectiveness of mitigation, and measure compliance with future permit and licence conditions and stator requirements. Monitoring will also be used to address uncertainties associated with effects predictions, identify any unanticipated effects, and provide input into corrective actions or adaptive management to limit those effects. Collectively, these actions are anticipated to improve the overall environmental performance of the Project.

Adaptive management has been identified as a key element of the Project's approach to risk management. Adaptive management is a planned and systematic approach to improving knowledge over time through an iterative process that provides the information required to increase confidence to make decisions that reduce uncertainty and improve risk management outcomes. Adaptive management provides a structured approach to decision-making that emphasizes accountability and explicitness but also allows for flexibility to identify and implement new mitigation measures or to modify existing measures during the lifespan of the Project.

For example, if environmental monitoring detects environmental changes that are different from predicted changes, the adaptive management framework in the relevant management plan would be implemented to determine if and what actions are needed to meet the underlying objectives of minimizing adverse effects and reducing uncertainties.

Environmental management plans will be used as a mechanism for the implementation of mitigation measures identified through the environmental assessment process. Through the previous EIS, environmental management plans were submitted to the Department of Environment and Climate Change for approval to fulfill provincial EA release conditions. Champion has adopted the

previously approved environmental management plans and has updated these plans to reflect updated Project design and optimizations, and the results of the effects assessment presented in this EIS.

The environmental management plans included in the EIS are:

- Dam Safety Plan (Annex 5B)
- Emergency Response Plan (Annex 5C)
- Environmental Protection Plan Annotated Table of Contents (full Construction Environmental Protection Plan will be available prior to commencement of construction) (Annex 5D)
- Environmental Effects Monitoring Program (Annex 5E)
- Erosion and Sediment Control Plan (Annex 5F)
- Kami Engagement Plan (Annex 5G)
- Waste Management Plan (Annex 5H)

The following environmental management plans will be prepared and submitted following the submission of the EIS:

- Gender Equity, Diversity and Inclusion Plan (Annex 5A)
- Workforce and Employment Plan
- Transportation Impact Assessment and Traffic Management Plan

24.4 Summary of Engagement

Champion's commitment to responsible mining is reflected in its four core values: Pride, which fosters a collective sense of belonging in all spheres of iron ore mining; Ingenuity, which encourages employee creativity and operational excellence; Respect, which encompasses the respect of people, resources, the environment, safety standards, partnerships, and equipment; and Transparency, which promotes transparent communication through active listening and open dialogue.

Champion is dedicated to building strong relationships with Indigenous groups and public stakeholders through three pillars including ensuring a safe, inclusive work environment; engaging with communities; and protecting the environment and biodiversity. These relationships are seen as essential to the success and sustainability of Champion's operations, enabling Champion to create lasting benefits, reduce negative impacts, and support local economic development through hiring, sourcing, and community investment. Champion's engagement objectives, aligned with the EIS, include sharing project updates, maintaining open dialogue and fostering engagement with Indigenous groups and stakeholders through the EIS and duration of the Project; identifying concerns early; adapting project design to mitigate impacts; and demonstrating responsiveness to feedback.

Champion has been conducting engagement on the Project since the acquisition of the Project in 2021. Champion has engaged with a wide range of parties throughout the environmental assessment process for the Project, including active engagement with five Indigenous groups:

- Innu Nation
- Innu Takuaikan Uashat mak Mani-Utenam
- La Nation Innu Matimekush-Lac John
- Naskapi Nation of Kawawachikamach
- NunatuKavut Community Council

Public stakeholder engagement has included residents of Labrador City ,Wabush, Fremont; cabin owner associations; recreational and cultural groups; local businesses; and community organizations, with collaboration facilitated through groups including the Kami Working Group. Champion has also coordinated closely with provincial and federal government agencies, including the Environmental Assessment Committee, which is comprised of representatives from key NL government departments, each responsible for providing regulatory guidance and ensuring compliance with applicable environmental and industry regulations.

Engagement activities from November 22, 2022, to June 12, 2025, included weekly fieldwork updates, public information sessions, in-person and virtual meetings, formal correspondence, and participation in regional forums.

To support regional planning and collaboration, Champion established the Kami Working Group in May 2024. This group includes representatives from local municipalities, cabin owners associations, recreational groups, and a provincial legislator. It plays a key role in addressing project-related concerns and supporting Project-planning efforts. Champion also joined the Labrador West Alliance in June 2024, a revitalized Regional Task Force composed of industry, government, and community leaders. The Alliance

aims to address long-standing regional development challenges such as housing, infrastructure, and workforce needs that are identified in both the 2014 Plan BIG and the 2024 Future of Lab West Summit.

These engagement efforts have identified a wide range of topics, issues and concerns. Feedback through the engagement process was systematically categorized and integrated into the EIS, ensuring that concerns are addressed across environmental, socioeconomic, and project-specific components.

24.5 Next Steps

24.5.1 Provincial Environmental Assessment Process

As described in Section 11 of the *NL Environmental Assessment Regulations, 2003*, upon receipt of this EIS, the Minister will promptly forward it to a review committee for review. Within seven days of receipt, the Minister will announce the availability of this EIS for public review. Interested parties will have a 50-day window to submit their written comments and responses to the Minister.

The review committee will then evaluate the EIS, and any comments received during the review period and make a recommendation to the Minister. This recommendation will outline if the EIS is adequate and the project can be released from the EA process or if further revisions are required.

Should the Minister require additional information or clarification, they will inform the proponent within 70 days of receiving the EIS. This period includes the time needed to announce the receipt and gather public comments. If no further work is mandated, the Minister will notify the proponent in writing, confirming the EIS's compliance with the *Act* and guidelines.

This decision will be publicly announced within ten days, marking the conclusion of the EIS approval process.

24.5.2 Permitting Requirements

The Project is also subject to federal and provincial legislation, regulations, permitting, and authorization requirements, which will be administered by appropriate authorities throughout the life cycle of the Project, to which Champion must obtain and comply with.

Additional details relating to specific regulations, permits, authorizations, and/or approvals which may be required are further described below. It is expected that these legislative instruments will provide a framework for the Project to be developed and operated in compliance with all applicable environmental, safety, and land use requirements.

24.5.2.1 Federal

Federal agencies including Environment and Climate Change Canada (ECCC); Fisheries and Oceans Canada; and Transport Canada (TC) may be involved in relation to the administration of permits under applicable regulations. A summary of some federal permitting requirements for the Project are described below.

Fisheries Act* and *Metal and Diamond Mining Effluent Regulations

The *Fisheries Act* restricts the release of harmful substances into fish-bearing waters unless such releases are permitted by regulations. The *Metal and Diamond Mining Effluent Regulations* (MDMER), created under subsections 34(2), 36(5), and 38(9) of the *Fisheries Act*, pertain to metal and diamond mines, including milling and hydrometallurgical facilities with an effluent flow rate of at least 50 m^3/day that discharge harmful substances into fish-bearing waters. ECCC oversees the enforcement and implementation of section 36(3) of the *Fisheries Act* and the MDMER.

For projects that involve the disposal of mine waste into water frequented by fish, or where harmful substances from the waste might enter such water, an amendment to Schedule 2 of the MDMER and approval of a Fish Habitat Compensation Plan are required. The MDMER allows for the use of water bodies housing fish for mine waste disposal if proponent's can demonstrate, through an alternatives assessment report, that these locations are the most suitable options from an environmental, technical, economic, and socioeconomic standpoint.

A key requirement of the MDMER is the development and implementation of a Fish Habitat Compensation Plan to offset the loss of fish habitat caused by mine waste disposal. This plan must comply with Section 27.1 of the regulations. Before any mine waste can be deposited into water bodies listed in Schedule 2 of the MDMER, the Minister of the Environment must approve the plan, based on advice from Fisheries and Oceans Canada. Additionally, mine owners or operators must provide an irrevocable letter of credit or a similar financial guarantee to ensure that the Fish Habitat Compensation Plan elements are fully addressed in the event of non-compliance.

To Project is planning to overprint fish bearing watercourses with mine waste disposal and an amendment to Schedule 2 of the MDMER is required. As part of this EIS submission, a Fish and Fish Habitat Offsetting Plan (TSD IX) and Mine Waste Management Alternatives Assessment Report (TSD III) have been prepared to support this permitting process.

As noted in Section 1.1, Impact Assessment Agency of Canada confirmed that the *Impact Assessment Act* does not apply to the Project because it had previously undergone a federal comprehensive study and received a determination under the *Canadian Environmental Assessment Act*; therefore, it is included in the transition provision in subsection 185.1(1) of the *Impact Assessment Act*, which indicates that the *Act* does not apply. By submitting these documents with the EIS, Champion will coordinate with ECCC and Fisheries and Oceans Canada on their review of the documents and coordination of the consultation stage of the regulatory amendment process.

Species at Risk Act

Under the *Species At Risk Act*, aquatic and terrestrial species listed on Schedule 1 are federally protected in Canada. A permit is required from ECCC if a project/project activities are expected to result in effects to aquatic or terrestrial SAR or their habitats. No aquatic SAR were identified during fieldwork surveys, so it is not expected that a permit will be required for aquatic SAR. No listed vegetation species at risk were found during 2012/2013 baseline or 2023 baseline surveys so it is not expected that a permit will be required for vegetation SAR. The following terrestrial SAR were assessed in the EIS:

- Bank swallow (threatened)
- Common nighthawk (special concern)
- Harlequin duck (special concern)
- Short-eared owl (special concern)
- Northern myotis (endangered)
- Boreal caribou (threatened)
- American marten (threatened)

It is unlikely harlequin ducks breed in the wildlife LSA or vegetation RSA as suitable habitat is not present (except for potentially the Wabush River). Additionally, the last record of an observed individual is from 2012. Therefore, Project activities are not expected to impact harlequin ducks. None of the boreal caribou ranges overlap with the Project SSA or wildlife LSA, and Project activities are not expected to effect boreal caribou. Targeted baseline surveys listed in the EIS Guidelines are planned in 2025. Following the completion of targeted field surveys, Champion will coordinate with ECCC to determine permitting requirements related to terrestrial SAR.

Migratory Birds Convention Act, 1994

Under the *Migratory Birds Convention Act* and the *Migratory Bird Regulations*, 2022, ECCC enforces protections for migratory birds, including waterfowl, cranes, shorebirds, and songbirds, regardless of land ownership. The *Migratory Birds Convention Act* prohibits the disturbance or destruction of migratory bird nests and eggs, as well as the release of harmful substances into areas frequented by birds. Depending on the nature of Project activities, specific permits may be required. This includes scaring or killing permits, egg or nest destruction permits, or relocation permits. Compliance with the *Migratory Birds Convention Act* and *Migratory Bird Regulations* 2022 is mandatory, and all vegetation clearing must align with applicable municipal, provincial, and federal regulations. As confirmed in a meeting with the NL government biologists on September 18, 2024, it is likely that nest sweeps will be required before Project activities take place (typically no more than 72 hours before planned activities).

Canadian Navigable Waters Act

Under the *Canadian Navigable Waters Act*, owners of works who propose to construct, place, alter, rebuild, remove, or decommission works that are in, on, over, under, through, or across any navigable waters may be required to apply for an approval to TC or seek authorization through the public resolution process. The Navigation Protection Program is responsible for administering and processing applications for approval. The Minister of Transport has the authority to issue terms and conditions with an approval. In addition to the list of scheduled waterways, waterways may be considered navigable waters if they have a history of, or can support, small craft navigation for part of the year (including kayaks and canoes). There are multiple levels of Navigation Protection Program permitting, ranging from "No interference with navigation notification of work" to full "Application for approval to the Navigation Protection Program", depending on the duration and degree to which the proposal will interfere with navigation. Additional coordination with TC may be required to further determine the potential for permitting requirements under the *Canadian Navigable Waters Act* as TC has confirmed Project activities may trigger permitting requirements due to activities including infilling or dewatering of navigable waterways; construction of infrastructure over navigable waterways (e.g., bridges); and construction of new dams for the tailings management facility. Champion will coordinate with TC to address permitting requirements under the *Canadian Navigable Waters Act*.

Canadian Environmental Protection Act

Under the *Canadian Environmental Protection Act*, 1999, Champion will have to adhere to the *Environmental Emergency Regulations, 2019*. Although traditional permit requirements do not exist under this regulation – facilities that manage hazardous substances listed under Schedule 1 of *Canadian Environmental Protection Act* 1999 must meet specific compliance requirements depending on the type and quantity of substances handled as these substances often vary by substance classification and are based on both quantity and container capacity.

If a facility meets or exceeds the identified threshold, the facility must prepare and implement an Environmental Emergency Plan, identifying measures for prevention, preparedness, response, and recovery from environmental emergencies. Additionally, ECCC must be notified of the presence and classification of the listed substances. Champion will work with ECCC to determine applicable requirements listed within the *Environmental Emergency Regulations, 2019* under the *Canadian Environmental Protection Act,* 1999.

24.5.2.2 Provincial

Provincial agencies including The Department of Fisheries, Forestry and Agriculture; the Department of Environment and Climate Change (particularly the Environmental Assessment and Pollution and Prevention Divisions); the Department of Industry, Energy and Technology (Mineral Lands Division); and Digital Government and Service Newfoundland may be involved in relation to the administration of permits under applicable regulations. A summary of some provincial permitting requirements for the Project are described below.

Endangered Species Act

Like the federal *Species At Risk Act*, plant and animal species classified as endangered, threatened, or vulnerable, are afforded special protections within the province of NL under the *Endangered Species List Regulations*. The legislation applies to species, sub-species and populations that are native to NL, but does not include marine fish, bacteria, and viruses. No listed vegetation species at risk were found during 2012/2013 baseline, 2023 baseline surveys or identified by Atlantic Canada Conservation Data Centre. The following provincially listed species were assessed in the EIS:

- Bank swallow (threatened)
- Common nighthawk (vulnerable)
- Harlequin duck (vulnerable)
- Short-eared owl (vulnerable)
- Northern myotis (endangered)
- Hoary bat (endangered)
- American marten (vulnerable)

It is unlikely harlequin ducks breed in the wildlife LSA or vegetation RSA as suitable habitat is not present (except for potentially the Wabush River). Additionally, the last record of an observed individual is from 2012. Therefore, Project activities are not expected to impact harlequin ducks. Targeted baseline surveys listed in the EIS Guidelines are planned in 2025. Following the completion of targeted field surveys, Champion will coordinate with the Department of Fisheries, Forestry and Agriculture to determine permitting requirements related to listed species.

Forestry Act

The *Forestry Act* is the legal framework governing forest management, harvesting, and protection within the province. It mandates the forestry service to manage the forest resources within the province responsibility, ensuring the sustainable harvesting of timber and overall forest health. The *Act* also outlined the processes for timber sales, licensing, and the establishment of forest management districts. Additional coordination with the Department of Fisheries, Forestry and Agriculture is required to determine permitting, authorization, and/or approval requirements in relation to the *Cutting of Timber Regulations* (specific to permits for operating/carrying out industrial operations during forest fire seasons on Crown land; cutting Crown timber; and burning timber); as well as potential permitting requirements in relation to destroying problem animals.

Lands Act

Under the *Lands Act*, additional coordination with the Department of Fisheries, Forestry and Agriculture may be required to determine the need/requirement for Crown land leases.

Environmental Protection Act

Several regulatory requirements applicable to the Project exist under the *Environmental Protection Act* including the *Environmental Assessment Regulations, 2003*; the *Air Pollution Control Regulations, 2022*; the *Storage and Handling of Gasoline and Associated Products Regulations, 2003*; the *Used Oil and Used Glycol Control Regulations*; the *Waste Management Regulations, 2003*; and the

Pesticide Control Regulations, 2012. The *Environmental Assessment Regulations, 2003* are administered by the Environmental Assessment Division of the Department of Environment and Climate Change, who is responsible for providing the Release from EA Process authorization. The *Air Pollution Control Regulations, 2022*; the *Storage and Handling of Gasoline and Associated Products Regulations, 2003*; the *Used Oil and Used Glycol Control Regulations*; the *Waste Management Regulations, 2003*; and the *Pesticide Control Regulations, 2012* are administered by the Pollution and Prevention Division of the Department of Environment and Climate Change, who may require additional approvals/authorizations for activities including the construction and operation of industrial facilities; use of diesel generators; handling and storage of gasoline and associated products; establishment of fuel caches at remote sites; use of pesticides; as well as use of waste management systems.

Management of Greenhouse Gas Act

The *Management of Greenhouse Gas Act* aims to reduce greenhouse gas emissions from industrial facilities by establishing a reduction target and a fund to support emissions compliance within the province of NL. The *Act* covers industrial activities that meet certain emissions thresholds. Based on the annual estimates of Project GHG emissions, it is anticipated that the Project would be required to report its emissions under the provincial MGGA. The Project would also be subject to GHG emission reduction targets under MGGA and required to develop a best available control technology study, as outlined in Section 12.1 of the MGGA at the EIS stage. The best available control technology study is provided in TSD IV of this EIS.

Mining Act

The *Mining Act*, alongside the *Mining Regulations* and *Mineral Regulations* regulate mining activities within the province of NL, aiming to ensure the responsible and sustainable development of mining resources. This includes oversight of land tenure and the rights of explorers and developers of mineral properties (e.g., insurance and maintenance of mineral licenses and mining leases); mining development, operations, and closure activities; financial assurance; and mine safety requirements. The *Act* is administered by the Mineral Lands Division within the Department of Industry, Energy and Technology, who provide approvals and authorizations relating to Development, Rehabilitation, Operations, Closure, and Financial Assurance Plans; mining leases; surface leases; mineral licenses; and approvals for quarry permits or leases. Following the submission of the EIS, Champion will be submitting a Rehabilitation and Closure Plan that meets Section 7 of the Mining Regulations.

Occupational Health and Safety Act

The *Occupational Health and Safety Act* outlines the duties and responsibilities of employers, workers, and contractors to ensure a safe and healthy workplace. It establishes the minimum standards for workplaces and covers areas such as employer duties, worker duties, contractor duties, supplier duties, and the Department of Digital Government and Service Newfoundland's responsibilities for occupational health and safety. In particular, the *Occupational Health and Safety Regulations, 2012* sets out requirements in relation to minimum safety standards (e.g., equipment/personal protective equipment, instructions, training); development of harassment prevention plans; risk assessments; and requirements for occupational health and safety committees/policies.

24.5.3 Ongoing Engagement

Champion is committed to ongoing, transparent, and inclusive engagement with Indigenous groups, public stakeholders, and regulators throughout the life of the Kami Mining Project. This commitment is incorporated within the Kami Engagement Plan, which serves as a living document designed to evolve alongside the Project's planning, design, and implementation. The Kami Engagement Plan integrates Champion's values of responsible mining and community collaboration by ensuring timely sharing of information, open communication, and meaningful opportunities for feedback across all phases of the Project. It outlines clear objectives to build and strengthen relationships, incorporate stakeholder input into Project decisions, and proactively management risks and opportunities. Champion will regularly review the Kami Engagement Plan and refine the document based on input obtained through engagement activities and Project learnings. This adaptive approach will support the integration of feedback obtained throughout the engagement process to better guide the implementation of mitigation measures and commitments made during the EIS process, reinforcing Champion's goal of fostering its core values - Pride, Ingenuity, Respect, and Transparency.

During the Construction phase, Champion will provide regular updates on progress, potential disruptions, and mitigation measures, while prioritizing local employment and procurement. Engagement activities will include implementing and refining the Kami Engagement Plan, issuing public announcements and press releases, posting safety signage, and hosting community events and information sessions. In the Operations and Maintenance phase, Champion will continue addressing concerns such as noise, vibration, marine traffic, and land use through public announcements, a project commencement press conference, and facility tours for local governments and service organizations. During the Decommissioning and Rehabilitation phase, Champion will collaborate with communities to develop closure plans and gather feedback through public meetings and information sessions focused on future land use expectations.

24.6 Closing Statement

In June 2024, the Government of Canada announced the addition of high-purity iron to its list of critical minerals. This decision followed those of NL (November 2023) and Québec (January 2024), which also identified high-purity iron ore on their respective lists. High-purity iron is a rare and indispensable solution for decarbonizing the steel industry, which accounts for nearly 10% of global carbon emissions. The Labrador Trough hosts one of the largest resources of high-purity iron globally, creating an exceptional opportunity for NL to become a global leader in the sustainable green steel supply chain.

Champion's objective for the Project is to produce direct reduction quality iron ore. This material will enable the steelmaking transition towards direct reduced iron and electric arc furnaces, which produce steel without the use of coal. This shift can contribute to a reduction in emissions of approximately 50% compared to traditional blast furnace or basic oxygen furnace production methods. This Project will thus have a substantial positive impact on the global green steel supply chain. Green steel is anticipated to play a critical role in the infrastructure and applications necessary to decarbonize our economies. The necessity of this critical material highlights the urgent need for the Project.

From the onset of the Project, Champion has sought to improve and build on the previous iteration of the Project that was released from the EA process in 2014. This has included the review of key issues and concerns raised by Indigenous groups and local stakeholders to understand and address these concerns in the Project updates. Champion has also addressed several conditions of the previous EA release, which has reduced both uncertainty and risk. Updates to the Project include the implementation of comprehensive water management infrastructure, improvements to the design of the tailings management facility, and efforts to incorporate best available control technologies, such as an in-pit crusher and conveyance system to reduce GHG emissions.

No significant adverse effects on biophysical and socioeconomic VECs were predicted for the Project or for the Project in combination with RFDs, apart from services and infrastructure. The predicted demand for housing and accommodation, child care, education and training and health care services was found to exceed the existing capacity of these services and infrastructure in the LSA on an ongoing and consistent basis. Effects are greatest to be during the final years of construction and initial years of operation, when the demand on these services will be highest. To manage this effect, Champion is committed to ongoing work with the Labrador West Alliance, a Regional Working Group of mining companies, municipalities, provincial, and federal government agencies, and the Labrador West Chamber of Commerce to help address common issues, such as labour supply, health care service capacity, transportation access and housing/accommodations, which could include:

- coordinating with childcare service providers to notify them of the potential increase in demand
- coordinating with local health care providers and relevant government agencies to notify them of the Project and the potential increases in population associated with the Project workforce
- coordinating with community organizations to explore opportunities with affected organizations
- monitoring adverse effects on flight availability and cost
- managing the demand on housing and accommodation, with the priority to make more housing available over time to increase the potential for local employment opportunities
- creating new residential lots to accommodate population growth

Most of the VEC effect assessments determined similar results to what was assessed previously. Where changes to the characterization of residual effects were made, rationale was provided and where required, additional mitigation or monitoring commitments were made. Champion is committed to further improving the Project through an adaptive management process that will reduce uncertainty and further mitigate environmental effects.

In addition to addressing provincial and federal critical mineral objectives and commitments, the proposed Project would generate substantial socioeconomic benefits and opportunities for local communities, Indigenous groups, the province of NL, and Canada. These include increased direct local and national employment and associated indirect economic benefits and employment at local to national scales. The proposed Project would generate significant benefits through royalty and tax payments to the governments of NL and Canada. Champion would continue to prioritize training, employment, and business opportunities for the local communities closest to the Project.

In conclusion, the Project represents a considerable opportunity to support provincial, national and international sustainable development goals. It not only addresses the critical need for high-purity iron ore to enable to refinement of green steel but also provides considerable socioeconomic benefits. Champion is dedicated to ensuring the Project's success through transparent engagement, environmental stewardship and adaptive management.


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