

Joyce Direct Iron Inc.

# CEAA-2012 Time Limit Extension Application

for Joyce Lake Direct Shipping Iron Ore Project  
IAAC reference number 80015



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## Abbreviations

<i>Century Global Commodities Corporation</i>	<i>Century</i>
<i>Canadian Environmental Assessment Act, 2012</i>	<i>CEAA-2012</i>
<i>Coronavirus Disease 2019 Global Pandemic</i>	<i>COVID-19</i>
<i>Direct Shipping Iron Ore</i>	<i>DSO</i>
<i>Environment Assessment</i>	<i>EA</i>
<i>Environment(al) Impact Statement</i>	<i>EIS</i>
<i>Fly-in-fly-out</i>	<i>FIFO</i>
<i>NI-43-101 Feasibility Study</i>	<i>FS</i>
<i>Impact Assessment Act, 2019</i>	<i>IAA-2019</i>
<i>Guidelines issued in 2013 by IAAC for EIS Preparation</i>	<i>IAAC Guidelines</i>
<i>Impact Assessment Agency of Canada</i>	<i>IAAC or Agency</i>
<i>Indigenous Group</i>	<i>IG</i>
<i>IAAC Information Request</i>	<i>IR</i>
<i>Joyce Direct Iron Inc.</i>	<i>JDI</i>
<i>Joyce Direct Shipping Iron Ore Project</i>	<i>Joyce Project or Project</i>
<i>Newfoundland and Labrador</i>	<i>NL</i>
<i>Newfoundland and Labrador Environmental and Climate Change Guidelines to be issued by NL-ECC for EIS Preparation</i>	<i>NL-ECC</i>
<i>Newfoundland and Labrador Environmental Protection Act</i>	<i>NL-ECC Guidelines</i>
	<i>NL-EPA</i>



*Note: This CEAA-2012 Time Limit Extension Application contains federal and provincial government departments and company names and other references which are current or abbreviated names; historical names are not provided.*

## **1.0 Introduction**

This document requests that JDI's Joyce Project, in Newfoundland and Labrador, continue IAAC EA evaluation through completion of the supply of requested information under CEAA-2012 from 28 August 2022 to 31 December 2025.

Since IAAC registration on 19 Nov 2012, the Project EA has progressed under CEAA-2012. Following the enactment of IAA-2019 on 28 Aug 2019, JDI elected to continue the EA process under CEAA-2012.

To date, over \$45 million has been expended on the Joyce Project, including:

- Prospecting to deposit discovery,
- Resource definition drilling,
- Preliminary economic assessment,
- A definitive FS,
- EA baseline data collection for IAAC and NL-ECC,
- Data collection from 11 additional requested studies,
- IAAC EIS filed 21 May 2021,
- Consultation with IG and the public,
- Extensive interaction with IAAC and NL-ECC, and
- Update underway of NI43-101 resource statement and FS.

Expenditures over the past 15 years have contributed significant economic benefit to the province and local IGs. At peak the Joyce Project employed approximately 80 field personnel, and in 2014 JDI was honored with the "Discovery of the Year Award" by the Canadian Institute of Mining (Newfoundland Chapter).

The Joyce Project was re-registered with NL-ECC on 21 May 2021, as the original 15 October 2012 registration expired on 18 November 2016 when time limits were exceeded during a five-year project economic hiatus due to poor market conditions. Guidelines for preparation of the NL-ECC EIS are expected 30 May 2022.



JDI submits that the Joyce Project is a suitable candidate for a CEAA-2012 time limit extension as:

- Essentially, baseline EA data collection is complete,
- 13 requested update studies are ongoing,
- An EIS was submitted to IAAC on 21 May 2021,
- IAAC completed EIS conformity review on 5 July 2021,
- JDI will submit to IAAC a “draft” conforming EIS before 28 Aug 2022, and
- Substantive IG consultation under CEAA-2012 has been completed.

A comprehensive listing of reasons to approve the CEAA-2012 time limit extension are provided in Section 2.

Ongoing meetings between JDI and IAAC (Halifax) have generated an IAAC recommendation which considers a CEAA-2012 time limit extension together with coordination with NL-ECC to produce an IAAC/NL-ECC combined EIS. JDI has committed to IAAC’s recommendation and the recommendation steps include:

- Submission to IAAC of a conforming “Draft” EIS before 28 August 2022,
- Submission of individual chapters at an earlier date, if they are available,
- A “Draft” EIS conformity review by IAAC,
- Unofficial technical review of the “Draft” EIS by IAAC,
- Modification by JDI of the “Draft” EIS for technical deficiencies,
- Compilation by JDI of an NL-ECC EIS,
- Combination of IAAC and NL-ECC EIS’s into a single EIS,
- Submission of the combined final EIS to IAAC and NL-ECC, and
- Normal EIS conformity and technical review by IAAC and NL- EIS of the combined EIS.

During regular consultation JDI has informed the five IGs, to be consulted by JDI, of its intention to seek a CEAA-2012 time limit extension. JDI has also held substantive prior consultation with stakeholders, including IGs and the public. These activities are cataloged in Appendices A, and meetings between JDI and IAAC as well as NL-ECC are cataloged in Appendix B.

Section 5 contains a projected work plan schedule of the recommended approach by IAAC. The plan includes a contingent delay and has concluded that an extension of the subsection 181(2) time limit to 31 December 2025 is necessary for JDI to complete the supplying of EA information, based on a single IAAC extension.



IAAC and NL-ECC EA Process to 28 Aug 2022 (Table 1)	
Activity	Dates
<b>IAAC</b>	
Project registration with IAAC	19 Nov 2012
IAAC EIS final Guidelines issued	5 Mar 2013
EIS Project baseline data collection	2011 to 2014
IAAC EIS submission	21 May 2021
IAAC EIS conformity review completed	5 Jul 2021
IAAC requested new studies	Ongoing
Conforming IAAC EIS submission	Before 28 Aug 2022
<b>NL-ECC</b>	
Project original registration with NL-ECC	15 Oct 2012
NL-ECC EIS original final Guidelines issued	13 Dec 2013
NL-ECC original registration expiry	18 Nov 2016
NL-ECC Project re-registration	21 May 2021
NL-ECC advise that new guidelines and EIS required	4 Nov 2021
NL-ECC requested new studies	Ongoing
NL-ECC EIS final Guidelines may be issued	30 May 2022

## 2. Reasons for Time Limit Extension

- The Joyce Project EA under CEAA-2012 has been ongoing since project registration in 2012 and the issuance of Guidelines in 2013. EIS data collection and consultation has also continued, other than during a five-year project economic hiatus due to poor market conditions. The IAAC EIS was submitted on 21 May 2022.
- The 21 May 2021 EIS submission was followed by a conformity review on 5 July 2021, and since that time JDI has been modifying the EIS to satisfy the conformity revisions. IAAC has also made additional information requests for field surveys as part of the thirteen 2021/2022/2023 surveys/studies requested by IAAC, NL-ECC and IG’s. See Table 4.
- The IAAC recommendation to submit a conforming EIS as a draft before 28 August 2022 and subsequently to do an unofficial technical review before combining the IAAC with the NL-ECC EIS was developed during meetings between JDI and IAAC. The final combined EIS will be submitted to both IAAC and NL-ECC for the normal formal review process. JDI has committed to IAAC’s recommended procedure consistent with the CEAA-2012 time limit extension.
- The Project configuration and key parameters have remained essentially unchanged since 2013, and the 2013 EIS Guidelines remain applicable today.



- Extensive consultation with IGs and the public has been ongoing since 2010. IGs have received several recent invitations for full project presentations. JDI provides frequent updates on its EA activity to all five impacted IGs, and JDI has notified the five IGs of JDI’s request for a subsection 181(2.1) time limit extension. Considerable efforts are currently underway to schedule additional consultation with IGs, including progressing toward development of an IBA process.
- The Joyce Project conforming IAAC EIS will be submitted before 28 Aug 2022 and will comply with 2013 Guidelines and address conformity deficiencies identified during the 5 Jul 2021 conformity review.
- 13 study requests are currently in hand, including four from IAAC, two from IGs, and seven from NL-ECC which will be part of new guidelines once issued. JDI understands some of the requested additional information is to update current information.
- IAAC has recommended that JDI combine the Joyce Lake IAAC EIS and NL-ECC EIS into a single EIS. JDI has committed to this approach. Steps to achieve this goal are shown in Section 5.
- Additional Project delays can be expected if the Joyce Project EA process were to proceed under IAA-2019 as numerous EA steps would need to be repeated. Such a reversion would be unlikely to garner additional benefits. A reversion would significantly impact JDI’s ability to finance the EA work, with a consequential loss of investor interest. Project advancement would be jeopardized.
- JDI believes that the Joyce Project meets the legislative criteria for the IAA-2019 time limit extension beyond 28 Aug 2022 to 31 December 2025.
- Due to COVID-19, in 2020 through 2022 interprovincial movement was restricted, as was access to the Joyce Lake Project site and the communities of Schefferville, Kawawachikamach and Matimekush-Lac John. Precisely quantifying COVID-19 time delays is difficult, but hydrogeological data collection is known to be delayed by in excess of five months.

<b>Summary Impact of COVID-19 from Jan 2020 to Mar 2022 (Table 2)</b>	
<b>Activity Impacted</b>	<b>Delays</b>
Inability of JDI staff to attend JDI Toronto offices	Indeterminate
Inability for face-to-face interaction with EA consultants updating EIS	Indeterminate
Reduced commercial flight availability to project area	16 months
Restriction on inter-provincial travel and visiting Indigenous Communities	Several months
Inability to collect hydrogeological data	5 months



IG community elections do not formally delay the consulting process, but elections can indirectly create delay. JDI is consulting with five Indigenous Groups. Before a community election, an Indigenous community may relegate the consultation process to temporarily being of a lower priority. In a post-election period, new community policies and a need for additional consultation may arise. Over the past two years (2020 and 2021), three of the five IGs that JDI is consulting with have held elections, and in 2022 two more IGs plan to hold elections.

### **Summary of Reasons to Grant Time Limit Extension Under Subsection 181(2.1)**

JDI is requesting a Joyce project time limit extension for the supply of information by JDI to 31 December 2025. Key advantages to granting the extension include:

- Validation of consultation process and not confusing stakeholders with procedural changes
- Minimizing consultation costs for JDI and for IG’s
- Enhanced cooperation between IAAC and NL-ECC
- Minimization of work for IAAC, NL-ECC, JDI and IG’s
- Avoiding placing Project economic viability in jeopardy
- Avoiding investor loss of interest
- Avoiding confusion and loss of credibility with stakeholders, including IG’s
- Avoiding significant cost escalation and significant time loss

<b>Summary – Reasons for Time Limit Extension (Table 3)</b>
Project registered and EA under CEAA-2012 ongoing since 2013
Project configuration/key parameters unchanged since 2013
IAAC recommendation and JDI commitment to recommendation under CEAA-2012 extension
JDI CEAA-2012 time limit extension request to end June 2025
Extensive consultation with IGs and public completed
Following IAA-2019 legislation, JDI remained under CEAA-2012 to 28 Aug 2022
Conforming IAAC Draft EIS to be submitted before 28 Aug 2022
Studies requested to update EIS for 2021/2022 are ongoing
IAAC recommended combined IAAC and NL-ECC EIS requires extended time to execute
Delays and project viability would be in jeopardy if move to IAA-2019
Project complies with IAA-2019 time limit extension provisions
Experienced 2020 to 2022 COVID-19 EA delays
Experienced IGs’ election-related EA consultation delays

### **3. 2021/2022 IAAC, NL-ECC and IGs Survey Requests**





During 2021 and 2022, JDI has received 13 requests for additional surveys. These surveys are underway or in discussion. They are summarized in Table 4 and scheduled in Section 5.

Of the 13 surveys, results from four surveys will be provided to IAAC as supplemental information, two surveys will be done at the request of IGs and may be included in the combined EIS, and seven surveys will be done under NL-ECC final Guidelines.

<b>New Surveys Requested 2021 &amp; 2022 - ongoing or being prepared (Table 4)</b>		
<b>Agency</b>	<b>Date</b>	<b>Request</b>
<b>IAAC (separate from EIS)</b>		
Env. Canada/Canadian Wildlife Service (CWS)	2021	migratory and breeding bird survey
Env. Canada/Canadian Wildlife Service (CWS)	2022	migratory and breeding bird survey
Health Canada	2021	air quality modeling study
Health Canada	2022	country foods
<b>NL-ECC (under final Guidelines)</b>		
NL-ECC Wildlife Division	2021	nighthawk and bat survey
NL-ECC Wildlife Division	2022	bat migration and breeding survey
NL-ECC Wildlife Division	2021/22	rare moss survey
NL-ECC Wildlife Division	2022	vascular plant survey
NL-ECC	2022	air quality modeling study
NL-ECC	2022/23	hydrogeological monitoring survey
<b>IG Requests (likely separate from EIS)</b>		
Naskapi Nation of Kawawachikamach	2022	Indigenous land use study
Innu Nation of Matimekush-Lac John	2022	Indigenous land use study

## 4. Project Development and Prior EA Activity

The Joyce Project is a Greenfield open pit direct shipping iron ore project. It is located entirely in Newfoundland and Labrador, close to the border with Quebec, and approximately 20 km from Schefferville and the Indigenous communities of Kawawachikamach and Matimekush-Lac John in Quebec.

The Joyce Project has spent in excess of \$40 million on project development. Based on the 2015 NI43-101 FS, \$260 million will be spent on capitalized development to reach production.

Capital and seven years of operating expenses will result in expenditures totaling \$1.3 billion.

Joyce Project construction is expected to take 18 months, followed by annual production of 2.5 million tonnes of direct shipping iron ore products. Mining will be by conventional drilling



and blasting, followed by on-site dry crushing and screening prior to product haulage over a temporary rock causeway as part of a 43 km new haul road to an existing rail line in the Astray Lake area. Product will be railed to Sept-Iles and then ocean shipped from the new multi-user port at Pointe-Noire to the global seaborne market.

As mining and processing are dry, no tailings will be generated. The production life of the Joyce Project is approximately 7.5 years. The Project is expected to provide employment for 310 persons during construction and 269 persons during operation. Employee sourcing will be from local IG communities and from FIFO workers.

JDI is in the process of updating the Joyce Lake NI 43-101 Technical Report mineral resources statement and the Joyce Lake NI 43-101 Technical Report FS.

NI 43-101 Technical Reports Published on SEDAR (Table 5)	
Activity	Dates
Independent Technical Report, Attikamagen Iron Project	released 21 Jan 2011
NI 43-101 Technical Report, Mineral Resources Estimate	released 18 Apr 2013
Preliminary Economic Assessment, Joyce Lake Project	released 8 May 2013
Mineral Resource Update, Joyce Lake DSO Iron Project	released 17 Apr 2014
Feasibility Study, Joyce Lake Direct Shipping Iron Ore Project	released 14 Apr 2015

## Joyce Lake 2011 to 2016 EA Activities

Joyce Direct Iron Inc.

TASK DESCRIPTION	PLAN START	PLAN END	TYPE	2012												2013												2014												2015												2016											
				J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D
<b>IAAC Related Activities</b>																																																															
Project registration	2012-11-19	2012-11-19	O																																																												
Final Guidelines	2013-03-05	2013-03-05	O																																																												
Baseline data collection	2012-01-01	2014-12-31	G	← Actual start spring 2011																																																											
Project economic hiatus	2015-12-01	2016-12-31	R																																																												
<b>NL-ECC Related Activities</b>																																																															
Project original registration	2012-10-15	2012-10-15	O																																																												
Final original Guidelines	2013-12-13	2013-12-13	O																																																												
Baseline data collection	2012-01-01	2014-12-31	G	← Actual start spring 2011																																																											
Project economic hiatus	2015-12-01	2016-12-31	R																																																												
Original registraion lapses	2016-11-18	2016-11-18	O																																																												





## 6 Formal Request Under Subsection 181(2.1) to Extend Time Limit

In accordance with subsection 181(2.1) of the *Impact Assessment Act*, Joyce Direct Iron Inc. (“JDI”) requests that the time limit be extended for JDI to provide the Impact Assessment Agency (“IAAC” or “Agency”) with the information and studies the IAAC requires or may in future require for the purpose of conducting the environmental assessment of or preparing a report with respect to the environmental assessment of the Joyce Project. Set out below are the relevant legislative provisions and the background of the Joyce Project, its current status, and JDI’s plan to bring the Joyce Project to production.

Section 181, in part, reads:

*181 (1) Any environmental assessment of a designated project by the former Agency commenced under the 2012 Act before the day on which this Act comes into force, in respect of which the former Agency has posted the notice of commencement under section 17 of the 2012 Act before that day, is continued under the 2012 Act as if that Act had not been repealed.*

*(2) The proponent of a designated project referred to in subsection (1) must provide the Agency with any information or studies required by the Agency or the former Agency under subsection 23(2) of the 2012 Act within three years after the day on which this Act comes into force.*

*(2.1) At the proponent’s request, the Agency may, before the time limit referred to in subsection (2) has expired, extend the time limit by any period that is necessary for the proponent to provide the Agency with the information or studies.*

*(3) If the proponent fails to provide the information or studies within the time limit referred to in subsection (2) or within any extension of that time limit, the environmental assessment is terminated. The Agency must post a notice of the termination on the Internet site.*

Subsection 181(2.1) “information or studies” are those required under subsection 23(2) of the *Canadian Environmental Assessment Act, 2012* (“CEAA 2012” or “2012 Act”). Section 23 reads:

*23 (1) The responsible authority may, when conducting the environmental assessment of a designated project and preparing the report with respect to the environmental assessment of the designated project, use any information that is available to it.*

*(2) However, if the responsible authority is of the opinion that there is not sufficient information available to it for the purpose of conducting the environmental assessment or preparing the*



*report with respect to the environmental assessment of the designated project, it may require the collection of any information or the undertaking of any study that, in the opinion of the responsible authority, is necessary for that purpose, including requiring the proponent to collect that information or undertake that study.*

Century Global Commodities Corporation (“Century”), JDI’s parent company, through Century subsidiary Labec Century Iron Ore Inc. registered the Joyce Project under CEAA-2012 on 19 Nov 2012. Despite challenges posed by the prolonged (2015–2020) downturn in iron ore prices, the Joyce Project’s Environmental Assessment (“EA”) and Environmental Impact Statement (“EIS”), completed in accordance with the former Agency’s guidelines (or “IAAC-Guidelines”) issued in 2013 and filed on 21 May 2021, are well-advanced. JDI anticipates that before 28 Aug 2022 (“Time Limit”) it will provide the IAAC with the information and studies currently outstanding in relation to the CEAA-2012 conformity review of the EIS.

On 21 May 2021, JDI also submitted the identical EIS to Newfoundland and Labrador – Environment and Climate Change (“NL-ECC”) as a project re-registration document to start afresh the NL EA process after the expiry of the former registration during the market downturn. On 4 Nov 2021, JDI learned that NL-ECC required JDI to file a new EIS. NL-ECC is expected to issue final environmental impact statement guidelines (“NL-ECC Guidelines”) under the Newfoundland and Labrador *Environmental Protection Act* (“NL- EPA”) by 2 May 2022.

Compliance with IAAC’s request that JDI coordinate the CEAA-2012 process with the NL-EPA process, so that a single EIS is published that complies with both IAAC Guidelines (“IAAC-Guidelines”) and NL-ECC Guidelines, will in the anticipated course of future events result in IAAC requiring JDI to supply additional information and studies. The expected and, as yet, unspecified information and studies cannot be provided to IAAC prior to the Time Limit because they have not yet been identified and requested, nor will they be likely identified and requested by the Time Limit.

JDI requests that the Agency, in accordance with subsection 181(2.1), extend the Time Limit by the period necessary for JDI to provide the information and studies, as yet unspecified, that the Agency may require in accordance with subsection 23(2), CEAA-2012. JDI requests that the Time Limit be extended to 31 December 2025.

**Attachments:**

- A. Consultation with Indigenous Groups
- B. Prior Engagement with IAAC and NL-ECC

<b>ATTACHMENT A. Consultation with Indigenous Groups (up to 22 Mar 2022)</b>			
<b>Stakeholder</b>	<b>Type of Engagement</b>	<b>Date</b>	<b>Summary of Discussion</b>
Naskapi Chief Louis Einish	Meeting	18 Nov 2010	Received support letter for the 2010 drill program in Lac Sans Chef, and overview of work at Attikamagen Project was presented; visit was done with previous exploration management at Century
Real McKenzie and council members from Conseil de la Nation Innu Matimekush-Lac John	Meeting	1 Mar 2011	Introduction of Century team and projects
Rosario Pinette and the Conseil de la Nation Innu, Takuaikan Uashat Mak Mani-Utenam	Letter	7 Mar 2011	Re 4 Mar 2011 meeting in Sept Iles for Corporate introduction of Century
Real McKenzie	Letter	7 Mar 2011	Summarized 1 Mar 2011 meeting
Chief Gregoire and Band Council members plus Armand McKenzie from Conseil de la Nation Innu, Takuaikan Uashat Mak Mani-Utenam	Meeting	Mar 2011	Corporate introduction meeting with Sandy Chim, CEO of Century
Naskapi Chief and Naskapi Nation of Kawawachikamach Band Council	Meeting	11 May 2011	Corporate introduction meeting for Century
Chief Real McKenzie and Chief Ernest Gregoire	Meeting	Mar 2012	Planning for future IBA discussion
Lawyers from O'Reilly and Associates representing Conseil de la Nation Innu, Takuaikan Uashat Mak Mani-Utenam	Meeting	6 Jun 2012	Began negotiation of pre-production agreement
Nadir Andre lawyer for the Conseil de la Nation Innu Matimekush-Lac John	Meeting	13 Jun 2012	Discussed rail strategy
Grand Chief Joseph Riche of the Innu Nation	Meeting	20 Jun 2012	Corporate introduction of Century meeting
Chief Real McKenzie and his Band council members	Meeting	11 Jul 2012	Exploration program update
Naskapi Nation of Kawawachikamach Band Council	Meeting	12 Jul 2012	Exploration program update
Chief Louis Einish and council members	Meeting	18 Jul 2012	Discussion
Innu Nation	Meeting	28 Nov 2012	IBA meeting
Innu Nation	Meeting	9 Jan 2013	IBA meeting
Innu member	Meeting	11 Feb 2013	Discussion of current and historical use of cabins lining Iron Arm
Naskapi member	Meeting	18 Feb 2013	Discussed use of cabins along Iron Arm Concern expressed about operation noise affecting cabin owners
Consultants to the Naskapi Band Council	Meeting	20 Feb 2013	Discussed doing business with Naskapi

Stakeholder	Type of Engagement	Date	Summary of Discussion
Naskapi Nation Kawawachikamach Band Council	Meeting	19 Mar 2013	Update on winter drill program
Innu Nation	Meeting	30 Apr 2013	Concern expressed about operation noise affecting cabin owners
Family of the late Chief Isaac of the Naskapi at Kawawachikamach	Visit	20 Jun 2013	Sympathies extended
Naskapi of Kawawachikamach Elders and Band Council	Meeting	20 Jun 2013	Century presented overview of Joyce Project Concerns of residents discussed, including employment, water quality, transportation infrastructure
Board members of Radio Kue Attinukan	Meeting	20 Jun 2013	Discussed support for new radio station construction
Jean Claude Pinette of ITUM Band Council	Phone call	27 Jun 2013	Discussed potential meeting with band council and documentary
Bande de la Nation Innu Takuaikan Uashat mak Mani-Utenam	Guideline Comments	7 Aug 2013	Concern expressed over how Joyce Project would affect land use within Beaver Reserve Lots 209 and 211, which were identified as being of critical importance to the Innu of Uashat mak Mani-Utenam; concern expressed that Draft Guidelines did not adequately consider future traditional use of the area
Naskapi Chief at Kawawachikamach	Meeting	17 Oct 2013	Introduction to the new Chief
Chief Real McKenzie, Councillor Pauline Aster and Councillor Ann-Marie Ambrose	Meeting	25 Oct 2013	Recap of Century's activity during 2013 and addressed some questions from Chief Real McKenzie and Band Council members about local workers hired by Century
Bande de la Nation Innu Takuaikan Uashat mak Mani-Utenam	Meeting	27 Jan 2014	Importance of consultation and proper protocol for communicating with residents - all communication or engagement must go through the Chief and Band Council; IBA said to be too general and needs to be more specific about potential Indigenous job / business opportunities; discussed importance of support from mining companies for community infrastructure – swimming pool and ice rink
Bande de la Nation Innu Matimekush-Lac John	Meeting	27 Jan 2014	Chief said the Band is opposed to mining exploration and development, and it will be hard to get support from the community for the project; past experience dealing with other mining companies had been disappointing because the Band had not received payments as per assigned IBA
Bande de la Nation Innu Matimekush-Lac John	Visit	11 Feb 2014	Attended ice rink reopening ceremony at the invitation of Chief
André Michel (ITUM)	Letter	13 Mar 2014	Acknowledged sponsorship request for local fishing event and provided support
Marie-Marthe McKenzie (Innu Matimekush Lac-John)	Letter	9 Apr 2014	Acknowledged sponsorship request for local carnival event and provided support



Stakeholder	Type of Engagement	Date	Summary of Discussion
Real McKenzie and council members from Conseil de la Nation Innu Matimekush-Lac John	Letter	9 Apr-2014	Concern over Joyce Project conflicting with family territory and concerns about pumping of Joyce Lake
Rene Gabriel (ITUM)	Letter	10 Apr 2014	Acknowledged receipt of faxed letter about Joyce Project being on his family territory
Louise André (Innu Matimekush-Lac John, Naskapi)	Letter	16 Apr 2014	Acknowledged sponsorship request for Jimmy Sandy Memorial School graduates and provided support
Kawawachikamach Band Council (Paul Mameanskum, George Guanish, Ken Lam, Léonard McKenzie)	Meeting	10 Jun 2014	Discussed use of cabins and aerial photos were used to identify cabin owners; concern expressed about potential Joyce Project effects on water quality of Iron Arm and fish populations
Naskapi Nation of Kawawachikamach	Meeting	27 Jun 2014	Century provided updates about its business plan, activities and next steps; discussed upcoming Open House and hiring for Joyce Project jobs; Chief Swappie explained that Naskapi Nation Band Council had a Human Resources coordinator to provide a list of qualifications of suitable workers to assist in hiring process; concerns expressed about waste management and sewage affecting the water supply
Bande de la Nation Innu Matimekush-Lac John, Naskapi Nation of Kawawachikamach	Open House	30 Jun 2014	Century provided updates about its business plans, activities and next steps; discussed Century's exploration plans for Joyce Lake, Blackbird Lake, Saint Martin Lake and Bruin Lake; discussed concerns expressed by community members about lake drainage and environmental oversight of Joyce Project
Paul Mameanskum (Naskapi Nation of Kawawachikamach)	Letter	2 Jul 2014	Acknowledged sponsorship request for local fishing event and provided support
Chief Real McKenzie (Matimekush)	Letter	16 Jul 2014	Acknowledged receipt of faxed letter about Joyce Project conflicting with the territory of Auguste Jean-Pierre
Bande de la Nation Innu Matimekush-Lac John	Meeting	23 Jul 2014	Discussion of Labec Century projects in the area and how Joyce Project would create jobs and business opportunities for the area
Naskapi Nation of Kawawachikamach	Letter	22 Aug 2014	Century provided updates about its business plans, activities and next steps
Yan Dominique, Gilles Dominique (Matimekush)	Phone call	28 Aug 2014	Discussion of who gave permission for Century to drill in the area and request for exploration plans
Yan Dominique, Chief Real McKenzie and council members from Conseil de la Nation Innu Matimekush-Lac John	Letter	31 Aug 2014	Acknowledged request for exploration plans and provision of maps, plans, and other materials
Chief Real McKenzie (Matimekush)	Meeting	2 Sep 2014	Discussed appropriate response to Yan Dominique and potential threats to Century property and personnel

Stakeholder	Type of Engagement	Date	Summary of Discussion
Yan Dominique (Matimekush)	Letter	4 Sep 2014	Discussed protocol for communication as requested by Chief and Band Council
Jimmy James Einish (Naskapi Nation of Kawawachikamach)	Letter	5 Sep 2014	Acknowledged sponsorship request for local softball event and provided support
Joanne Strasser	Letter	2 Oct 2014	Acknowledged sponsorship request for Terry Fox Foundation Run and provided support
Naskapi Nation of Kawawachikamach	Letter	25 Oct 2014	Invitation for community meeting / open house
Bande de la Nation Innu Matimekush-Lac John	Letter	25 Oct 2014	Invitation for community meeting / open house
Bande de la Nation Innu Matimekush-Lac John, Naskapi Nation of Kawawachikamach	Letter	11 Nov 2014	Century provided updates about its business plans, activities and nextsteps
Charlotte Pien (Naskapi Nation of Kawawachikamach)	Letter	17 Nov 2014	Acknowledged sponsorship request for suicide prevention conferenceand provided support
Claudine Auger, Emilie Hamel	Letter	17 Nov 2014	Acknowledged sponsorship request for Ecole Kanatamat Tshitipenitamunu school trip and provided support
Naskapi Nation of Kawawachikamach	Meeting/Open House	4 Dec 2014	A variety of issues and questions were brought forward; these issues are detailed in Table 3.4 of EIS
Innu Nation	Meeting	4 Dec 2014	Century provided update on its business plans, activities and next steps; discussed importance of training for local workers
Bande de la Nation Innu Matimekush-Lac John	Letter	15 Jan 2015	Invitation for community meeting / open house
Chief Real McKenzie (Matimekush)	Letter	17 Feb 2015	Invitation for community meeting / open house
Chief Noah Swappie (Naskapi Nation of Kawawachikamach)	Letter	19 Aug 2015	Provided support through sponsorship of equipment to the Nuuhchimiiyuschihiy Camp
Joanne Strasser	Letter	25 Aug 2015	Sponsorship of musical equipment to the Jimmy Sandy Memorial School
Chief Noah Swappie, Denis Drolet (Naskapi Nation of Kawawachikamach)	Letter	16 Sep 2015	Acknowledged sponsorship request for Jimmy Sandy Memorial School hockey team and provided support
Chief Real McKenzie (Matimekush)	Letter	16 Oct 2015	Sponsorship of diesel fuel for the Matimekush-Lac John community
Chief Noah Swappie (Naskapi Nation of Kawawachikamach)	Letter	16 Oct 2015	Sponsorship of diesel fuel for the Naskapi Nation of Kawawachikamach community
Naskapi Nation of Kawawachikamach	Letter	9 Mar 2021	Re-introduction of Joyce Project, update on Project's status and request to meet
Innu Nation	Letter	9 Mar 2021	Re-introduction of Joyce Project, update on its status and request to meet
NunatuKavut Community Council	Letter	9 Mar 2021	Re-introduction of Joyce Project, update on its status and request to meet

Stakeholder	Type of Engagement	Date	Summary of Discussion
Bande de la Nation Innu Matimekush-Lac John	Letter	9 Mar 2021	Re-introduction of Joyce Project, update on status of Joyce Project, and request to meet
Naskapi Nation of Kawawachikamach	E-Mail	24 Mar 2021	Renewed request to meet and provided information on 2021 fieldwork
NunatuKavut Community Council	E-Mail	24 Mar 2021	Renewed request by JDI to meet
NunatuKavut Community Council	Phone Call	31 Mar 2021	Renewed request by JDI to meet
Stella Pien (Naskapi Nation of Kawawachikamach)	Phone Call	31 Mar 2021	Discussion regarding status of Joyce Project and request to meet
Andre Michel (ITUM)	Phone Call	31 Mar 2021	Discussion regarding status of Joyce Project and request to meet
Bande de la Nation Innu Matimekush-Lac John	Phone Call	31 Mar 2021	Discussion regarding status Joyce Project and request to meet
Morgan Kendall (ITUM)	E-Mail	5 Apr 2021	Renewed request to meet
Donna Paddon (Innu Nation)	Phone Call	6 Apr 2021	Discussion of Joyce Project status and scheduling meeting
Naskapi Nation of Kawawachikamach	Meeting	9 Apr 2021	Presentation of Project, development plans and discussion of a variety of issues and opportunities for the Naskapi Nation of Kawawachikamach.
NunatuKavut Community Council	Meeting	9 Jun 2021	Re-introduction of Joyce Project
Bande de la Nation Innu Matimekush-Lac John	Meeting	14 Jul 2021	Presentation of Joyce Project, summer fieldwork, development plans and discussion of a variety of issues and opportunities for la Nation Innu Matimekush-Lac John
Naskapi Nation of Kawawachikamach	Letter	3 Aug 2021	Letter informing of summer field work and requesting community consultations
Naskapi Nation of Kawawachikamach	Letter	24 Aug 2021	Letter of congratulations to Chief Chemaganish
Naskapi Nation of Kawawachikamach	Letter	8 Sep 2021	Letter stating concerns regarding Joyce Project
Naskapi Nation of Kawawachikamach	Visit	16 Sep 2021	Visit to Schefferville, consultation declined
Naskapi Nation of Kawawachikamach	Letter	22 Sep 2021	Letter informing of summer field work and requesting meeting
Naskapi Nation of Kawawachikamach	Letter	30 Sep 2021	Letter commemorating National Day for Truth and Reconciliation
Bande de la Nation Innu Matimekush-Lac John	Letter	30 Sep 2021	Letter commemorating National Day for Truth and Reconciliation
Innu Takuaikan Uashat Mak Mani-Utenam	Letter	30 Sep 2021	Letter commemorating National Day for Truth and Reconciliation
Innu Nation	Letter	30 Sep 2021	Letter commemorating National Day for Truth and Reconciliation
NunatuKavut Community Council	Letter	30 Sep 2021	Letter commemorating National Day for Truth and Reconciliation
Naskapi Nation of Kawawachikamach	Letter	15 Oct 2021	Letter informing of conclusion of field work and requesting meeting
Naskapi Nation of Kawawachikamach	Letter	3 Nov 2021	Letter requesting land use study
Innu Takuaikan Uashat Mak Mani-Utenam	Letter	18 Nov 2021	Renewed request to meet



Stakeholder	Type of Engagement	Date	Summary of Discussion
Naskapi Nation of Kawawachikamach	Letter	18 Nov 2021	Renewed request to meet
NunatuKavut Community Council	Letter	18 Nov 2021	Renewed request by JDI to meet
Innu Nation	Letter	18 Nov 2021	Renewed request by JDI to meet
Bande de la Nation Innu Matimekush-Lac John	Letter	18 Nov 2021	Renewed request to meet
Lindsay Richardson and Jacynthe Ledoux (consultant and counsel, respectively, for Naskapi Nation of Kawawachikamach)	Meeting	30 Nov 2021	Discussion of land use study proposal and its scope
Bande de la Nation Innu Matimekush-Lac John	Letter	3 Dec 2021	Request to discuss capacity funding
Innu Takuaikan Uashat Mak Mani-Utenam	Letter	7 Dec 2021	Request for meeting and to discuss capacity funding
Naskapi Nation of Kawawachikamach	Letter	14 Dec 2021	Acknowledgement of request to meet
NunatuKavut Community Council	Letter	15 Dec 2021	Acknowledgement of request by JDI to meet
Bande de la Nation Innu Matimekush-Lac John	Letter	21 Dec 2021	Discussion of capacity funding
Innu Takuaikan Uashat Mak Mani-Utenam	Letter	21 Dec 2021	Discussion of capacity funding and arranging meeting details
Naskapi Nation of Kawawachikamach	Letter	21 Dec 2021	Acknowledgement of internal community consultations
NunatuKavut Community Council	Letter	21 Dec 2021	Arranging meeting details
Naskapi Nation of Kawawachikamach	Letter	13 Jan 2022	Informing Nation of hydrogeological work
Bande de la Nation Innu Matimekush-Lac John	Letter	13 Jan 2022	Informing Nation of hydrogeological work
NunatuKavut Community Council	Meeting	29 Jan 2022	Attended annual general assembly as sponsor
NunatuKavut Community Council	Meeting	11 Feb 2022	Discussion of Joyce Project status and future consultation work
Naskapi Nation of Kawawachikamach	Letter	14 Feb 2022	Update on hydrogeological work and renewed request to meet
Bande de la Nation Innu Matimekush-Lac John	Letter	14 Feb 2022	Update on hydrogeological work and renewed request to meet
Innu Takuaikan Uashat Mak Mani-Utenam	Letter	14 Feb 2022	Renewed request to meet
Naskapi Nation of Kawawachikamach	Letter	16 Feb 2022	Response to hydrogeological work and request for EIS draft guidelines review capacity funding
Bande de la Nation Innu Matimekush-Lac John	Letter	18 Feb 2022	Request for EIS draft guidelines review capacity funding
Lindsay Richardson (consultant for Naskapi Nation of Kawawachikamach)	Meeting	23 Feb 2022	Update on hydrogeological work, consideration of request to meet, and discussion of 2022 fieldwork
Bande de la Nation Innu Matimekush-Lac John	Letter	7 Mar 2022	Discussion of EIS draft guidelines review capacity funding



<b>ATTACHMENT B. Regulatory Engagement with IAAC and NL-ECC (up to 22 Mar 2022)</b>			
<b>Stakeholder</b>	<b>Type of Engagement</b>	<b>Date</b>	<b>Summary of Discussion</b>
NLDOECC (Water Resources and EA Divisions)	Meeting	15 Oct 2012	Century provided an overview of Joyce Project and discussion of anticipated surface water interactions
NLDOECC (Water Resources and EA Divisions)	Meeting	15 Oct 2012	Reviewed discussions to date with government agencies and feedback on provincial registration
NLDOECC (Pollution Prevention)	Outgoing call	16 Oct 2012	Discussion of baseline air quality information and review by Pollution Prevention
NLDOECC (Wildlife)	Meeting	8 Nov 2012	Presentation of Joyce Project overview and work plans and discussion of request for caribou collar data
DFO	Outgoing call	5 Dec 2012	Comments from DFO on Joyce Project description
DFO	Meeting	7 Dec 2012	Discussion of baseline work conducted in support of fish and fish habitat, and DFO's comments on Joyce Project description – effects of water crossings on fish and fish habitat
NLDOECC (Pollution Prevention)	Outgoing call	17 Jan 2013	Discussion of ambient air quality modeling
NLDOECC (Newfoundland and Labrador Department of Environment and Conservation)	Outgoing call	21 Jan 2013	Discussed changes presented during 16-Jan-2013 EA Committee meeting
CEA Agency, now IAAC	Meeting	19 Jun 2013	Discussed engagement activities with Indigenous groups; Other topics discussed: economics of Joyce Project; permitting process; CEAA process; and issues identified to date
Stephen Hinchey, Mineral Lands Division, Newfoundland and Labrador Department of Natural Resources ("NLDNR") (now part of the Newfoundland and Labrador Department of Industry, Energy and Technology ["NLDIET"])	Letter from Century	14 Apr 2014	Addressed concerns Mr. Hinchey had previously brought to Century's attention re: hiring of Indigenous workers; consultation with stakeholders and residents; and long term sustainable benefits
Government of Quebec	Meeting	23 Jul 2014	Century provided update on Joyce Project and discussed challenges faced with trap lines of one of the families of the Innu Matimekush Lac-John Band
Heather Rafuse, Mineral Lands Division, NLDNR (now part of NLDIET)	Letter from Century	29 Jul 2014	Addressed concerns Ms. Rafuse had previously brought to Century's attention re: hiring of Indigenous workers; consultation with stakeholders and residents; and long term sustainable benefits



Stakeholder	Type of Engagement	Date	Summary of Discussion
IAAC	Meeting	3 Nov 2014	Meeting with IAAC regarding Joyce Project update, consultation activities, and submission schedule
NLDOECC (Water Resources and EA Divisions)	Meeting	6 Nov 2014	Meeting with representatives from NLDOECC regarding Joyce Project update, consultation activities, and submission schedule
DFO	Meeting	6 Nov 2014	Meeting with representatives from DFO regarding Joyce Project update and review of causeway option
Paul Carter, Royalties & Benefits (Newfoundland and Labrador Department of Natural Resources)	Meeting	7 Nov 2014	Discussion of IBA considerations for employment of Indigenous workers
Transport Canada	Meeting	27 Nov 2014	Meeting with representatives from Transport Canada regarding Joyce Project update, consultation, and implications of revised <i>Navigation Protection Act</i> (since revised to <i>Canadian Navigable Waters Act</i> )
Environment Canada	Meeting	27 Nov 2014	Meeting with representatives from Environment Canada regarding Joyce Project update and consultation
DFO	Meetings	8 Dec 2014	Meeting with representatives of DFO related to EA approach and specific concerns related to effects of causeway (i.e. sedimentation and flow)
Provincial Archaeology Office	Meetings	16 Dec 2014	Discussion of effects of causeway on archeological site identified in PDA
CEA Agency	Outgoing call	18 Dec 2014	Discussion of community questions and concerns from the meeting with Naskapi Nation of Kawawachikamach on 4-Dec-2014)
Christopher Coggan & Lindsay Richardson (Atmacinta)	Letter from Century	9 Feb 2015	Update about response to community questions and concerns from the meeting with Naskapi Nation of Kawawachikamach on 4-Dec-2014)
IAAC	Letter from Century	17 Oct 2019	Informed IAAC of decision to continue Joyce Project environmental assessment under CEAA 2012
NLDOECC	Letter from Century	31 Oct 2020	Update of Proponent contact information for Joyce Project-related matters
IAAC and NLDOECC	Letter from Century	21 Dec 2020	Re-introduction to Joyce Project, update on Joyce Project status, and re-activation of environmental assessment process
IAAC and NLDOECC	Meeting	5 Jan 2021	Re-introduction to Joyce Project, update on Joyce project status, and re-activation of environmental assessment process



Stakeholder	Type of Engagement	Date	Summary of Discussion
IAAC and NLDOECC	Meeting	1 Feb 2021	Update on Joyce Project progress and discussion of approach to EIS submission with respect to inter-agency coordination
IAAC and NLDOECC	Letter from Century	16 Feb 2021	Change of proponent to Joyce Direct Iron Inc.
IAAC and NLDOECC	Meeting	18 Mar 2021	Discussion of approach to EIS submission with respect to inter-agency coordination
NRCan	E-Mail correspondence	18 Mar 2021	Re-introduction of Joyce Project and request for informal feedback
Health Canada	Meeting	31 Mar 2021	Re-introduction of Joyce Project, discussion of emissions modeling, and discussion of effects on country food sources
Transport Canada	Meeting	1 Apr 2021	Re-introduction of Joyce Project, discussion of <i>Canadian Navigable Waters Act</i> , and discussion of Navigation Protection Program application process
Environment and Climate Change Canada	Meeting	6 Apr 2021	Re-introduction of Joyce Project and discussion of potential additional bird survey requests
DFO	Meeting	20 Apr 2021	Re-introduction of Joyce Project and discussion of potential habitat offset strategies
Newfoundland and Labrador Department of Fisheries, Forestry and Agriculture (Wildlife Division)	E-Mails	23 Apr 2021	Re-introduction of Joyce Project and request for guidance on bat surveys
IAAC	Meeting	26 Apr 2021	Discussion of approach to EIS submission with respect to inter-agency coordination
IAAC and NLDOECC	Meeting	14 May 2021	Update on EIS and project registration submission
IAAC	E-Mails	13 Jul 2021	Update on EIS conformity revision efforts
IAAC, Health Canada, Environment and Climate Change Canada	Meeting	20 Jul 2021	Discussion of EIS conformity revision plan
IAAC	E-Mails	29 Jul 2021	Discussion of EIS conformity revision plan
NLDOECC	E-Mails	15 Aug 2021	Discussion of EA Minister's decision extension request
NLDOECC	E-Mails	31 Aug 2021	Discussion of EA Minister's decision extension request
NLDOECC	Meeting	14 Sep 2021	Discussion of EA Minister's decision extension request
NLDOECC	Meeting	29 Sep 2021	Discussion of EA Minister's decision extension request
IAAC	Meeting	14 Oct 2021	Update on EIS conformity revision efforts
NLDOECC	Meeting	15 Oct 2021	Discussion of EA Minister's decision extension request
IAAC	Phone call	20 Oct 2021	Update on EIS conformity revision efforts
NLDOECC Water Management Division	Meeting	9 Nov 2021	Discussion of comments on project registration document

Joyce Direct Iron Inc. Joyce Lake Direct Shipping Iron Ore Project

Draft - CEAA-2012 extension request March 30, 2022 DRAFT | April 16 with IAAC requested modifications

Stakeholder	Type of Engagement	Date	Summary of Discussion
NLDOECC	Meeting	11 Nov 2021	Discussion of Minister's decision and EIS draft guidelines
IAAC	Meeting	18 Nov 2021	Discussion of approach to EIS submission with respect to inter-agency coordination
NLDOECC	Meeting	2 Dec 2021	Discussion of Minister's decision and EIS draft guidelines
NL Indigenous Affairs	Meeting	10 Dec 2021	Discussion of consultation requirements
NLDOECC Wildlife Division	Meeting	20 Dec 2021	Discussion of EIS draft guideline requirements
IAAC	Meeting	17 Dec 2021	Discussion of CEAA 2012 extension request with respect to inter-agency coordination
NLDOECC	Meeting	6 Jan 2022	Discussion of EIS draft guidelines
IAAC	E-Mails	12 Jan 2022	Requesting discussion of CEAA 2012 extension request
NLDOECC	Meeting	6 Jan 2022	Discussion of EIS draft guidelines
NLDOECC	Meeting	20 Jan 2022	Discussion of EIS draft guidelines
IAAC	E-Mails	31 Jan 2022	Protocols regarding CEAA 2012 extension request
NLDOECC	Meeting	3 Feb 2022	Discussion of EIS draft guidelines
IAAC	Letter from Century	14 Feb 2022	Requesting discussion of CEAA 2012 extension request
NLDOECC	Meeting	16 Feb 2022	Discussion of EIS draft guidelines
IAAC	Phone call	1 Mar 2022	Discussion of CEAA 2012 extension request
NLDOECC	Meeting	2 Mar 2022	Discussion of EIS final guidelines extension request
IAAC	E-Mails	4 Mar 2022	Reminder regarding expiry of CEAA 2012 process
NLDOECC	Meeting	16 Mar 2022	Discussion of EIS final guidelines extension request
IAAC and NLDOECC	E-Mails	18 Mar 2022	Sharing 2021 survey results for follow-up planning