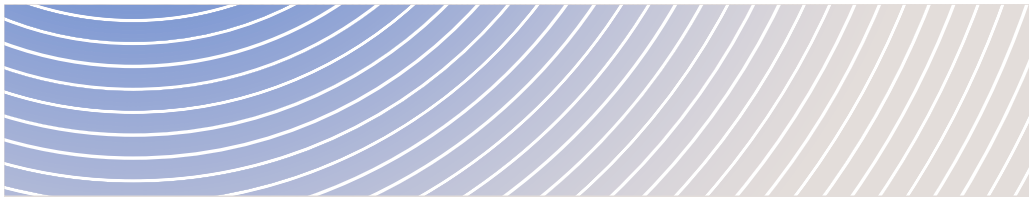


Tailored Impact Statement Guidelines



JOYCE LAKE DIRECT SHIPPING IRON ORE PROJECT

July 2026



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Abbreviations and short forms

Term	Definition
Adverse federal effects	“Adverse effects within federal jurisdiction” and “direct or incidental adverse effects” as defined under the <i>Impact Assessment Act</i>
IAA	<i>Impact Assessment Act</i>
IAAC	Impact Assessment Agency of Canada
CEAA 2012	<i>Canadian Environmental Assessment Act, 2012</i>
Draft EIS	The Draft Environmental Impact Statement that was submitted to the Impact Assessment Agency of Canada for review on October 1, 2022
ECCC	Environment and Climate Change Canada
EIS	Environmental Impact Statement
the Guidelines	Tailored Impact Statement Guidelines
GHG	Greenhouse Gas
IEPP	Indigenous Engagement and Partnership Plan
LSA	Local Study Area
NL EIS Guidelines	Guidelines provided to the proponent for the development of the environmental impact statement required by NLECC
SARA	<i>Species at Risk Act</i>
SACC	Strategic Assessment of Climate Change
VC	Valued component

The Impact Assessment Agency of Canada’s (IAAC) guidance on the practice of the application of the *Impact Assessment Act* (the IAA) and its regulations is being updated, and the current versions of the guidance, referred to in this document, may not reflect the IAAC’s current practices. Proponents remain responsible for following applicable legislation and regulations. Proponents are encouraged to engage with IAAC regarding the applicability of the guidance. For more information, please contact joycelakeironoremine-minedeferjoycelake@iaac-aeic.gc.ca.



1 Introduction

The federal impact assessment process is intended to prevent or mitigate significant adverse effects within federal jurisdiction—and significant direct or incidental adverse effects—by anticipating, identifying and assessing the effects of designated projects in order to inform decision making under the IAA. These Tailored Impact Statement Guidelines (the Guidelines) for Joyce Lake Direct Shipping Iron Ore Project (the project) proposed by Joyce Direct Iron Inc. (the proponent) were tailored by the Impact Assessment Agency of Canada during the transition of the project from review under the *Canadian Environmental Assessment Act 2012* (CEAA 2012) to the IAA. IAAC will use the proponent's Impact Statement along with other available information to prepare an Impact Assessment Report.

The Guidelines include information and studies IAAC considers necessary for the conduct of the impact assessment based on adverse effects within federal jurisdiction, or direct or incidental adverse effects (collectively referred to as adverse federal effects hereafter) that could potentially be significant as informed by the nature, complexity and context of the project, as well as by consultation and engagement with the proponent, Indigenous groups, the public, the Government of Newfoundland and Labrador, and federal authorities.

1.1 Context

As part of the project's review under CEAA 2012, [Final Environmental Impact Statement \(EIS\) Guidelines](#) were issued to the proponent on March 5, 2013. In 2016, the proponent indicated that an Environmental Impact Statement would not be submitted until market conditions for iron had improved. On October 1, 2022, the proponent submitted a Draft Environmental Impact Statement¹ (Draft EIS) prepared in accordance with those guidelines. The Draft EIS was reviewed by IAAC, federal authorities, and Indigenous groups. Following the review, IAAC identified outstanding information and provided the proponent with questions that would have to be addressed in a final EIS.

On May 21, 2021, the proponent registered with the Government of Newfoundland and Labrador's environmental assessment process, and on November 3, 2021, the province determined that an EIS was required for the project, pursuant to the Newfoundland and Labrador *Environmental Protection Act*. On August 12, 2022, the [Environmental Impact Statement Guidelines for the Joyce Lake Direct Shipping Iron Ore Project](#) (English Only), hereafter referred to as the NL EIS Guidelines, were issued by Newfoundland and Labrador's Department of Environment and Climate Change.

Following a request from the proponent, on December 17, 2025, IAAC decided to continue the federal assessment of the project as an impact assessment under the IAA. As part of this transition from CEAA 2012, IAAC is issuing these Guidelines to the proponent to meet the requirements of the IAA.

¹ Available on request.



In preparing these Guidelines, IAAC notes that elements of the previous guidelines, as well as information from the environmental assessment steps completed under CEAA 2012, remain applicable to the information requirements of the IAA. IAAC reviewed this information and determined which components continue to apply in the context of the IAA, confirmed where the Draft EIS is relevant and meets requirements, considered where IAAC's [Standard mitigation measures - Streamlining the impact assessment process - Canada.ca](#) may be applicable, and identified where additional information is required.

These Guidelines outline the information and studies that the proponent is required to submit as follows:

- relevant sections of the Draft EIS that IAAC identifies as meeting requirements;
- revisions and new information required to address the outstanding information identified by IAAC in the questions arising from the review completed by IAAC, federal authorities, and Indigenous groups² of the Draft EIS - and still considered necessary in the context of the IAA and the definition of adverse effects within federal jurisdiction³;
- additional information necessary to fulfill the requirements of the IAA that were not required under CEAA 2012; and
- any changes to the project and the associated assessment of adverse effects in federal jurisdiction, should modifications have occurred since the Draft EIS submission.

The Impact Statement shall be integrated and updated building upon the Draft EIS and incorporating all revisions, new information, and project updates received since its submission. The proponent must ensure that all the information that is presented in the Impact Statement reflects the most current and up-to-date information. The information shall be presented in a manner that improves the completeness, clarity, and quality of the assessment as well as providing outstanding information as indicated in these Guidelines. In support of the Government of Canada's objective to promote the principle of "one project, one review", IAAC has prepared the Guidelines with references to the NL EIS Guidelines where the information already requested by the province would be sufficient to address the information and studies identified and required by IAAC. The proponent will provide one impact statement to both governments, thus reducing duplication.

To facilitate the review of the Impact Statement, please include a disposition table that itemizes the changes made from the Draft EIS.

1.2 Scope of the impact assessment

In determining what information and studies are required in the proponent's Impact Statement, as set out in these Guidelines, IAAC took into account the factors listed in subsection 22(1) of the IAA, and focused on elements anticipated to be material to decision making under the IAA as described in section [1.3 Selection of Valued Components](#).

² Information requests were sent to the proponent on March 10, 2023, and June 7, 2023.

³ Adverse effects within federal jurisdiction as defined in section 2(a) of the IAA.



1.3 Selection of Valued Components

Valued Components (VCs) serve as the focal points for the impact assessment. The elements of the natural and human environments selected as VCs are those anticipated to be material for decision making under the IAA. The assessment of effects on VCs includes the assessment of the likely effect pathways that are cause-effect linkages between a project component or activity and the VC. The VCs must be assessed following the requirements presented in these Guidelines, as well as the generic assessment methodology in the Generic Requirements for Impact Statements which outlines the steps that must be applied to the assessment of each VC.

The Impact Statement must include, at minimum, the following VCs:

Table 1. Valued Components Within Federal Jurisdiction Required Within the Impact Statement

Valued Component (VC) selected	Rationale for inclusion
VCs for the assessment of adverse effects within federal jurisdiction, as defined under section 2 of the IAA	
Fish and fish habitat	Physical changes to Joyce Lake, Iron Arm, and other bodies of water (lakes and ponds) and watercourses (permanent and intermittent) could have potential negative effects on fish survival and health, as well as on fish habitat, including deterioration, destruction, or disturbance.
Migratory birds	The project could have effects on migratory birds such as geese that are important for Indigenous groups, as well as on migratory bird species at risk. Habitat loss and fragmentation; the destruction of nests and eggs; sensory disturbances due to noise, vibrations and light; changes in air and water quality; and increased risk of mortality due to collisions could adversely affect migratory birds.
Indigenous Peoples' physical and cultural heritage, and structures, sites or things of historical, archeological, paleontological or architectural significance	Construction and operation of the mine (i.e., waste pile location) could impact the known and recognized landscape and historic and archaeological sites of importance to Indigenous Peoples, including but not limited to site GfDp-01 - Attikamagen Lake 1, and species of importance to Indigenous Peoples such as caribou.
Current use of lands and resources for traditional purposes by Indigenous Peoples	Construction and operation of the mine could impact Indigenous Peoples use of the land for hunting, fishing in Joyce Lake and Iron Arm, gathering, teaching younger generations, and use of the land as a place to reconnect with the land, culture, ancestors and themselves.



Health, social, and economic conditions of Indigenous Peoples	Construction and operation activities may adversely affect the community well-being of the Indigenous communities of Kawawachikamach, Matimekush, and Lac John, particularly due to airborne emissions, increased noise and light levels, as well as the loss or reductions of land and resources to access of traditional foods.
Additional VCs for decision-making factors under section 63 of the IAA	
Economic well-being of communities, job creation and economic opportunities.	The project's effects may contribute to long-term social and economic well-being of communities of Schefferville, Kawawachikamach, Matimekush, and Lac John in the project area, through increased community cohesion, employment and income.

The proponent may select additional VCs, in consultation with Indigenous groups and participants and in consideration of Indigenous Knowledge and community knowledge. The proponent must clearly explain how community and Indigenous knowledge, and current land and resource use were considered when defining local study area boundaries for each valued component. The Impact Statement must provide a justification if a VC suggested by an Indigenous group is excluded from the Impact Statement.

1.4 Preparing the Impact Statement

In preparing the Impact Statement, the proponent must adhere to ethical guidelines and cultural protocols governing research, data collection and confidentiality. The proponent must respect the obligation of protecting personal information, including for disaggregated data from small or unique populations, and adopt the established standards for the management of Indigenous data (e.g., the [First Nations principles of Ownership, Control, Access and Possession](#) or standards adopted by an Indigenous group), including obtaining permission from Indigenous groups before including information from or about them. The proponent may present the information in the Impact Statement in the manner it deems most appropriate. IAAC recommends the Impact Statement follow the structure of the Guidelines or provide a table of concordance that indicates where in the Impact Statement the information set out in these Guidelines has been provided.

The Impact Statement shall be integrated and updated building upon the Draft EIS and incorporating all revisions, new information, and project updates received since its submission. The Impact Statement must address requirements outlined in these Guidelines, including those referring to the requirements of the [NL EIS Guidelines](#). It must also address IAAC's Generic Requirements for Impact Statements, including the requirements on assessment methodology, general information, description of change to the project that may be caused by the environment, description of potential malfunctions and accidents that may occur in connection with the project, description of engagement with Indigenous groups, description of public participation, and Impact Statement Summary. The proponent may submit a single document that meets the requirements of both IAAC and NL EIS Guidelines.



Where the proponent is of the opinion that certain information is not required or cannot be provided, it should contact IAAC prior to submitting the Impact Statement to confirm whether the proponent's rationale for excluding the information is appropriate. The rationale must also be provided in the Impact Statement. As applicable, the proponent is also encouraged to refer to the requirements of other jurisdictions to assess effects, as well as the means of other jurisdictions to address effects of the project and to report in the Impact Statement how these were leveraged to assess effects. The proponent should also notify IAAC of any changes made to the project relative to the Joyce Lake Direct Shipping Iron Ore Project Draft EIS submitted in 2022.

The proponent must ensure that, when all the information is presented in the Impact Statement, it reflects the most current and up-to-date details at the time of submission:

- any changes that have been made to the project (components and/or activities) since the submission of the Draft EIS must be described; the related assessment of effects in federal jurisdiction, as well as corresponding mitigation and follow-up programs, must be reviewed and updated appropriately.
- any updated baseline information that is presented must be clearly identified; the related assessment of effects in federal jurisdiction, as well as corresponding mitigation and follow-up programs, must be reviewed and updated appropriately.

The Impact Statement must take into account, where relevant:

- any relevant regional or strategic assessment;
- any study or plan that is conducted or prepared by a jurisdiction—or an Indigenous governing body—in respect to the region related to the project and that is provided to the proponent with respect to the project;
- any relevant assessment of the effects of the project that is conducted by or on behalf of an Indigenous governing body and that is provided to the proponent with respect to the project;
- Indigenous Knowledge, community knowledge, as well as comments received from Indigenous groups, the public, and any jurisdiction; and
- Gender-Based Analysis Plus (GBA Plus) which, in the context of an impact assessment, is an analytical tool and process that examines how sex and gender intersect with other identity factors to assess who may be disproportionately impacted by a project and how they may experience impacts differently. It helps to identify the diverse experiences and needs of various population groups and informs strategies to mitigate barriers and promote equitable access to project benefits.

The proponent is encouraged to engage IAAC as early as possible to clarify the requirements in the Guidelines and to support early resolution of issues. To support this, IAAC may establish technical advisory groups, consisting of, as appropriate, Indigenous groups, federal authorities, provincial authorities or others. The proponent is also encouraged to submit draft documents for review by IAAC (e.g. proposed study plans, draft sections of the Impact Statement) prior to submitting the formal Impact Statement.



As relevant, the proponent is also encouraged to refer to the policy frameworks and guidance available in IAAC's [Practitioner's Guide to Federal Impact Assessments](#) including the [Technical Considerations and References for the preparation of an Impact Statement](#), and to keep apprised of updates.

The proponent is directed to include mitigation measures, as applicable, noted in IAAC's [Standard mitigation measures - Streamlining the impact assessment process - Canada.ca](#)

1.5 Federal permitting coordination

IAAC will provide coordination of federal permits, licences or authorizations (collectively called permits) early and throughout the impact assessment process to provide:

- clarity on permitting requirements, timelines and processes through the development of detailed federal permitting plans; and
- transparency on the status and progress of permits through public reporting on the Canadian Impact Assessment Registry Internet site.

Under the IAA, federal authorities are prohibited from issuing permits before an impact assessment is completed. The proponent, however, is encouraged to develop federal permit applications concurrent with the impact assessment. In some cases, the same information and studies may be used to inform both the impact assessment and federal permits. Collecting and providing permitting information during the impact assessment process may expedite subsequent federal decisions, where applicable. Early engagement with the federal government, Indigenous communities and the public is essential to support a speedy review of federal permits.

2 Project description

2.1 Project overview

To describe the project overview, the proponent must resubmit the information that was provided in Chapter 2 – Project Description of the Draft EIS. The information must be updated with any changes that have been made to the project, its components or activities.

2.2 Project components and activities

To describe the project components and activities, the proponent must resubmit the information that was provided in Chapter 2 - Project Description of the Draft EIS. Clarification is required in the EIS on the length of time it will take to dewater Joyce Lake.



2.3 Receiving environment

To describe the receiving environment, the proponent must resubmit the information that was provided in Chapter 4 – Environmental Setting of the Draft EIS. In addition, the proponent must clarify using recent information, the presence and location of permafrost in the project area, if any.

2.4 Project purpose, need and alternatives considered

The proponent must identify the purpose of and need for the project, as well as alternatives to the project and alternative means of carrying it out.

2.4.1 Purpose and need for the project

To explain the purpose and need for the project, the proponent must resubmit the information that was provided in section 2.1 - Purpose and Need for the Project of the Draft EIS.

2.4.2 Alternatives to the project

To explain the alternatives to the project, the proponent must resubmit the information that was provided in section 2.2 – Alternatives to the Project of the Draft EIS.

2.4.3 Alternative means of carrying out the project

To provide alternative means of carrying out the project, the proponent must resubmit the information that was provided in section 2.8 – Alternative Means of Carrying out the Project of the Draft EIS. The proponent must also include the information required in section 4.1.4.5 - Alternative Means of Carrying out the Project of the NL EIS Guidelines.

The Impact Statement must include the review and consideration of the following alternative means. If the proponent chooses not to adopt a proposed alternative, it is required to provide a clear rationale explaining why the alternative is not being implemented;

- alternative discharge locations for the initial dewatering of Joyce Lake;
- alternate locations for the final effluent discharge points;
- the use of alternative energy sources and technologies that could reduce the reliance on fossil fuels, including but not limited to the use of biodiesel and other alternative fuels for the lump dryer;
- alternative design options for the construction of the proposed 43-kilometre haul road, that include modern techniques such as improved fish passage through culverts to ensure the protection of fish and fish habitat;
- alternative locations for the waste rock pile;



- alternative means of the transfer of ore across Iron Arm; and
- alternative locations for the rock causeway given its location adjacent to the only discovered pre-contact archaeological site.

3 Fish and fish habitat

The impact assessment must assess the effects of the project on fish and fish habitat, as defined in subsection 2(1) of the *Fisheries Act*, based on likely effect pathways from project components or activities.

The spatial scale and pathway of effects will dictate the appropriate fish and fish habitat assessment methods, such as quantifying habitat loss and/or considering long-term population visibility.

Where *Fisheries Act* authorization(s) under paragraphs 4.4(2)(b) or 35(2)(b) are likely required for the project, the proponent is encouraged to provide the information required for permitting during the impact assessment in support of an efficient and shortened permitting approval process, and refer to [Project Planning: Applying for a Fisheries Act Authorization](#) and the [Applicant's Guide Supporting the Authorizations Concerning Fish and Fish Habitat Protection Regulations](#). This information can also reduce the time needed to obtain an authorization to deposit mine waste into a tailings impoundment area if a regulatory amendment to list the water frequented by fish on Schedule 2 of the Metal and Diamond Mining Effluent Regulations (MDMER) is required. For further guidance, the proponent should refer to the [Guide to the Regulatory Process for Listing Water Bodies Frequented by Fish in Schedule 2 of the Metal and Diamond Mining Effluent Regulations](#). Where it is not possible to eliminate, reduce or control adverse effects to fish and fish habitat, offsetting measures should be considered, which may include restoration of degraded fish habitat, habitat enhancement or construction, or stocking, referring to the [Policy for Applying Measures to Offset Harmful Impacts to Fish and Fish Habitat](#).

3.1 Baseline conditions for fish and fish habitat

To describe the baseline conditions for fish and fish habitat, the proponent must resubmit the information that was provided in section 15.5 Existing Environment of the Draft EIS.

In addition, the Impact Statement must include information that substantiates any statement by the proponent that a waterbody is not fish habitat.

3.2 Groundwater and surface water baseline conditions as a pathway of effects to fish and fish habitat

To describe the baseline conditions for groundwater and surface water, the proponent must resubmit the information that was provided in section 11.5.3 - Baseline Conditions (Water Resources) and section 12.5.3



- Baseline Conditions (Groundwater Resources) of the Draft EIS. The proponent must also include the information required in section 4.2.1.3.3.1 - Groundwater and section 4.2.1.3.3.2 - Surface Water of the NL EIS Guidelines.

In addition, the Draft EIS states that hydrogeologic modelling assumptions were based on the 2013 project description. As there have been modifications to the project since the 2013 project description, the Impact Statement must include any information obtained from updates to the hydrogeologic model, including new model inputs based on updated project description modifications, or provide a rationale as to why such an update is not required.

3.3 Effects to fish and fish habitat

To describe the effects to fish and fish habitat, the proponent must resubmit the information that was provided in section 15.6 - Assessment of Project Related Effects (Fish and Fish Habitat) of the Draft EIS. The proponent must also include the information required in section 4.2.1.4.4 - Effects Assessment and Mitigation, of the NL EIS Guidelines.

In addition, the Impact Statement must include:

- an assessment of the potential effects on the life cycle of the fish species present. The assessment of effects to fish and fish habitat must also consider:
 - an assessment of the potential for the causeway to be a barrier to fish passage, with consideration of all fish species at all life stages that may be present. If the causeway presents a barrier to fish passage, the proponent must indicate potential alternative designs to address fish passage concerns (e.g., additional bridges or culverts).
 - rationale that a spill of ammonium nitrate would dilute below the Canadian Council of the Ministers of the Environment Guidelines in minutes.
 - plans for monitoring of potentially affected waterbodies during the dewatering of Joyce Lake; and
 - information on the rehabilitative measures to restore fish habitat after the dewatering of Joyce Lake.

3.4 Effects to groundwater and surface water as a pathway of effect to fish and fish habitat

To describe the effects to groundwater and surface water, the proponent must resubmit the information that was provided in section 11.6 - Assessment of Project Related Effects (Water Resources) and section 12.6 - Assessment of Project Related Effects (Groundwater Resources) of the Draft EIS. The proponent must also include the information required in section 4.2.1.3.4 - Effects Assessment and Mitigation of the NL EIS Guidelines.

In addition, the Impact Statement must:



- provide further justification for the elimination of category “0” and “1” activities from further effects assessment. This must include additional detail on the “standard mitigations” for those listed as category “1” where applicable;
- if there is potential for permafrost to occur in the project area, provide a discussion of the relationship between permafrost conditions and associated processes and active layer, topography, drainage conditions, and surface hydrology. Update the effects analysis to describe the potential effects of the project on permafrost, recharge, and water balance and how these potential effects will be effectively mitigated if permafrost is encountered. Additionally, provide a discussion of potential effects of permafrost on the project; and
- update the effects assessment that was provided in the Draft EIS to account for the updated information provided in section 3.2- Groundwater and surface water baseline conditions as a pathway of effects to fish and fish habitat.

4 Migratory birds

The impact assessment must assess the effects of the project on migratory birds as defined under the *Migratory Birds Convention Act, 1994*, based on likely effect pathways from project components or activities.

4.1 Baseline conditions for migratory birds

To describe the baseline condition for migratory birds, the proponent must resubmit the information that was provided in section 16.5 - Existing Environment (Birds, Wildlife and their Habitats) of the Draft EIS. The proponent must also include the information required in section 4.2.1.4.3.1 – Baseline Studies - Avifauna (migratory and non-migratory), Other Wildlife and Their Habitats of the NL EIS Guidelines.

4.2 Effects to migratory birds

To describe the effects to migratory birds, the proponent must resubmit the information that was provided in section 16.6 - Assessment of Project Related Environmental Effects (Birds, Wildlife and their Habitats) of the Draft EIS. The proponent must also include the information required in section 4.2.1.4.4 - Effects Assessment and Mitigation (Avifauna (migratory and non-migratory), Other Wildlife and Their Habitats) of the NL EIS Guidelines.



5 Indigenous Peoples

The Impact Statement must demonstrate how impacts on Indigenous Peoples and their rights were considered and assessed, including:

- impacts resulting from any change to the environment on physical and cultural heritage or any structure, site or thing that is of historical, archaeological, paleontological or architectural significance;
- impacts resulting from any change to the environment on the current use of lands and resources for traditional purposes;
- changes to the health, social or economic conditions of Indigenous Peoples; and
- any adverse impacts on Indigenous rights.

Indigenous Peoples are best placed to understand how a project may impact them. The assessment of impacts on Indigenous Peoples and their rights must be done in collaboration with Indigenous groups as outlined in [Description of engagement with Indigenous groups](#). Where relevant, the proponent must collaborate with Indigenous groups to incorporate information from or about them into the assessment of all VCs (e.g. biophysical VCs). The proponent must respect each Indigenous group's preferences for assessing impacts, and discuss with each Indigenous group whether it is appropriate for the proponent to provide its conclusions regarding (residual and cumulative) impacts on Indigenous Peoples and their rights. If an Indigenous group has provided their own conclusion, the proponent is not required to provide one.

The proponent is expected to engage with all Indigenous groups impacted by the project, as set out in the Indigenous Engagement and Partnership Plan (IEPP), and to describe the outcomes of that engagement in the Impact Statement. In addition, the results of engagement should be analyzed and presented separately for each Indigenous group. This group-specific assessment does not need to repeat the entire analysis of each VC, but should summarize and present the information relevant to that group. To the extent possible, each group-specific assessment should be done in a way that works best for that Indigenous group.

Where requested by Indigenous groups, parts or all of the assessments of effects on Indigenous Peoples and their rights can be combined in the group-specific assessment. For example, effects on the current use of lands and resources for traditional purposes and impacts on Indigenous rights to hunt, fish, and trap can be reported together. Indigenous groups may also identify holistic VCs that encompass multiple environmental, health, social, or economic elements. Undertaking these assessments together, when requested, will support consistent conclusions. In all cases, the Impact Statement must demonstrate that all requirements were met.



5.1 Indigenous physical and cultural heritage, and structures, sites, or things of significance

The Impact Statement must assess and clearly distinguish the impacts of the project to physical or cultural heritage from the impacts to specific structures, sites or things, as well as align with the considerations set out in the [Technical Guidance for Assessing Physical and Cultural Heritage or any Structure, Site or Thing](#). Where applicable, incorporate the knowledge and oral history of Indigenous Peoples.

5.1.1 Baseline conditions for physical and cultural heritage, and structures, sites, or things of significance

To describe the baseline conditions for physical and cultural heritage, and structures, sites or things of significance, the proponent must resubmit the information that was provided in section 18.5 - Existing Environment (Historic and Cultural Resources) of the Draft EIS. The proponent must also include the information required in section 4.2.1.7.3 - Existing Environment (Historic and Cultural Resources) of the NL EIS Guidelines as it relates to the Indigenous Groups indicated in the IEPP.

In addition, the Impact Statement must:

- provide additional information to substantiate the determination of frequency, intensity, and continuity of Indigenous use and occupancy of the project area;
- ensure that all archaeological sites are clearly described, including details on any artifacts identified, and indicate whether Indigenous groups participated in site verification or were consulted regarding the site(s);
- describe how Indigenous groups have been or will be involved in the identification of historical, cultural, or spiritual resources located in the area potentially affected by the project;
- describe how existing cumulative effects have already impacted physical and cultural heritage;
- indicate the location of physical and cultural heritage features on maps, if they have been shared by Indigenous groups with the proponent and if the proponent has permission from the Indigenous groups for the information to be shared publicly. If required, a coarser geographic resolution can be presented; and
- describe how Indigenous groups participated, including by leading or contributing to studies.

Additionally, caribou are a species of importance to Indigenous Peoples, both in terms of cultural heritage and current use of resources for traditional purposes. To inform the impact assessment of cultural heritage and current use of resources for traditional purposes resulting from impacts on caribou, the Impact Statement must provide information on the baseline conditions of caribou. To this end the proponent must include the information in section 4.2.1.5.3 - Existing Environment (Species at Risk and Species of Conservation Concern) of the NL EIS Guidelines.

Prior to the submission of the Impact Statement, the proponent must consult with Indigenous Groups indicated in the IEPP to confirm the accuracy of the information presented in this section.



5.1.2 Effects to physical and cultural heritage, and structures, sites, or things of significance

To describe the effects to physical and cultural heritage, and structures, sites or things of significance, the proponent must resubmit the information that was provided in section 18.6 - Assessment of Project-Related Environmental Effects (Historic and Cultural Resources) of the Draft EIS. The proponent must also include the information required in section 4.2.1.7.4 - Effects Assessment and Mitigations (Historic and Cultural Resources) of the NL EIS Guidelines.

In addition, the Impact Statement must:

- assess:
 - changes to access to and experience with physical and cultural heritage,
 - changes to visual aesthetics over the life of the project and post-project abandonment or decommissioning, and
 - aspects of cultural heritage, including cultural identity, way of life and connection to the land by potentially impacted Indigenous groups;
- describe how Indigenous knowledge as well as engagement with Indigenous groups informed studies, including the identification of the sites to assess, and include any studies provided by Indigenous Peoples if permission has been obtained from the Indigenous group to include them;
- update the effects assessment that was provided in the Draft EIS to include effects to the updated information provided in section 5.1.1- Baseline conditions for physical and cultural heritage, and structures, sites or things of significance;
- expand the analysis of how the historic and contemporary sites located within the Project Study Area on Figure 19.11 of the Draft EIS are potentially impacted by the project, including the following:
 - confirming whether these sites have been subject to field investigation and, if not, providing a rationale and assessing the implications of this data gap;
 - assessing the potential direct and indirect project-related impacts on these sites, including the risk of disturbance, degradation, or destruction; and
 - evaluating the implications of these impacts on Indigenous use,
- expand the effects analysis to include aspects of cultural heritage, including cultural identity, way of life, and connection to the land by potentially impacted Indigenous groups; and
- describe how and where in the Impact Statement, Indigenous comments and issues related to physical and cultural heritage, and structures, sites, or things of significance are addressed.

With respect to effects on caribou, which is of importance to Indigenous Peoples, both in terms of cultural heritage and current use of resources for traditional purposes, the proponent must include the information required in section 4.2.1.5.4 - Effects Assessment and Mitigation (Species at Risk and Species of Conservation Concern) of the NL EIS Guidelines, to describe and assess the project's effects on caribou. In



addition, the Impact Statement must also include an assessment of the potential to return affected areas to pre-disturbance conditions to support traditional practices.

5.2 Current use of lands and resources for traditional purposes

The Impact Statement must assess the impacts of the project to the current use of lands and resources for traditional purposes. The analysis must align with the steps set out in the [Technical Guidance for Assessing the Current Use of Lands and Resources for Traditional Purposes under CEAA, 2012](#).

5.2.1 Baseline conditions for current use of lands and resources for traditional purposes

To describe the baseline conditions for current use of lands and resources for traditional purposes, the proponent must resubmit the information that was provided in section 19.5 - Existing Environment (Current Use of Land Resources for Traditional Purposes by Indigenous Persons) of the Draft EIS. The proponent must also include the information required in section 4.2.1.8.3 - Existing Environment (Other Contemporary Uses of Land and Resources) of the NL EIS Guidelines as it relates to the Indigenous Groups indicated in the IEPP.

In addition, the Impact Statement must:

- expand the regional study area boundary for current use of land and resources for traditional purposes by Indigenous Peoples to include the traditional territory of the Indigenous groups listed in the IEPP or provide a rationale for how the regional study area remains appropriate
- identify the lands covered by treaties, title areas, land claims or traditional territories (including maps);
- provide the location, type, and timing of current use activities within the project, local, and regional assessment areas;
- identify the species of flora, fauna, and avifauna that are hunted, gathered and/or harvested within the project, local and regional assessment areas;
- describe how existing cumulative effects, including but not limited to previous, existing and planned mining activity in the Schefferville area, have already impacted the current use of lands and resources for traditional purposes; and
- provide the evidence to support the proponent's view that the area is not preferred for hunting and fishing by Indigenous groups. Clarify when and how information on current use of land resources for traditional purposes in Table 19.5 of the Draft EIS was collected.

Prior to the submission of the Impact Statement, the proponent must consult with Indigenous Groups indicated in the IEPP to confirm the accuracy of the information presented in this section.



5.2.2 Effects to current use of lands and resources for traditional purposes

To describe the effects to current use of lands and resources for traditional purposes, the proponent must resubmit the information that was provided in section 19.6 - Assessment of Project-Related Environmental Effects (Current Use of Land Resources for Traditional Purposes by Indigenous Persons) of the Draft EIS. The proponent must also include the information required in section 4.2.1.8.4 - Effects Assessment and Mitigation (Other Contemporary Uses of Land and Resources) of the NL EIS Guidelines as it relates to the Indigenous Groups indicated in the IEPP.

In addition, the Impact Statement must:

- clarify how information will be communicated to Indigenous groups regarding the timing of restricting access to areas used by Indigenous Peoples for traditional purposes. Provide information on the consultation plan related to access to such areas;
- clearly explain how significance definitions and determinations considered the views of Indigenous Peoples. Provide an additional explanation of how 0, 1, and 2 ratings were determined regarding the impacts of the project on current use of lands and resources for traditional purposes;
- clarify how the proponent plans to prevent staff and contractors working on the mine from hunting and fishing in the area;
- revise the cumulative effects assessment including but not limited to previous, existing and planned mining projects in the Schefferville area or provide a rationale for excluding them from the assessment;
- describe the monitoring and management of impacts with respect to current use of lands and resources and how Indigenous groups in the area will be involved in the development and implementation of mitigation measures;
- explain how information was collected for proposed land use and local food studies, and how such studies informed the analysis of effects on current use and Indigenous health. Clarify if these proposed studies were conducted by Indigenous groups or by the proponent;
- provide a detailed description of the mitigation measures to be implemented during site remediation and closure to ensure long-term soil stability, appropriate grading, and erosion control of disturbed areas, such that these areas are safe and accessible for Indigenous groups following project completion;
- provide a rationale for the statement that some changes in access resulting from the Project would be positive and result in increased access prior to rehabilitation, considering both seasonal and year-round use;
- assess whether the project may contribute to the displacement of Indigenous Peoples from current and traditionally used areas of their territories, by reducing the desirability of these areas due to project-specific activities, that may result in noise, dust, traffic, and reductions in environmental quality even where the physical access remains available; and



- update the effects assessment that was provided in the Draft EIS to account for the updated information provided in section 5.2.1- Baseline conditions for current use of lands and resources for traditional purposes.

5.3 Health, social and economic conditions of Indigenous Peoples

The Impact Statement must assess the impacts of the project on the health, social and economic conditions of Indigenous Peoples. The proponent is encouraged to refer to the [Indigenous Mental Wellness and Major Project Development: Guidance for Impact Assessment Professionals and Indigenous Communities](#); the [Final Report on Missing and Murdered Indigenous Women and Girls, in particular the Calls for Justice for Extractive and Development Industries](#) (Calls for Justice 13.1 to 13.5), and Health Canada's [Interim Guidance: Health Impact Assessment of Designated Projects under the *Impact Assessment Act*](#).

5.3.1 Baseline conditions for the health, social and economic conditions of Indigenous Peoples

To describe the baseline conditions for the health, social and economic conditions of Indigenous Peoples, the proponent must resubmit the information that was provided in section 21.5 - Existing Environment (Indigenous Health, Community Services and Infrastructure) of the Draft EIS. The proponent must also include the information required in sections 4.2.1.6.3 - Existing Environment (Human Health) and 4.2.1.9.3 - Existing Environment (Economy, Employment and Business) of the NL EIS Guidelines as it relates to the Indigenous Groups indicated in the IEPP.

In addition, the Impact Statement must:

- describe how cumulative effects have already impacted the health, social, and economic conditions of each Indigenous group; and
- describe how Indigenous Knowledge and input were used in establishing baseline conditions.

Prior to the submission of the Impact Statement, the proponent must consult with Indigenous Groups indicated in the IEPP to confirm the accuracy of the information presented in this section.

5.3.2 Effects on health, social and economic conditions of Indigenous Peoples

To describe the effects to the health, social, and economic conditions of Indigenous Peoples, the proponent must resubmit the information that was provided in section 21.6 - Assessment of Project-Related Effects (Indigenous Health, Community Services and Infrastructure) of the Draft EIS. The proponent must also include the information required in sections 4.2.1.6.4 - Effects Assessment and Mitigation (Human Health),



and 4.2.1.9.4 - Effects Assessment and Mitigation (Economy, Employment and Business) of the NL EIS Guidelines as it relates to the Indigenous Groups indicated in the IEPP.

In addition, the Impact Statement must:

- include information to assess the impacts on specific demographic groups of the community such as women, elders, and youth;
- describe impacts to local capacity for emergency response in case of an accident or a malfunction;
- describe the extent to which Indigenous Peoples and/or Indigenous-owned businesses are anticipated to realize the economic benefits of the project, including employment, income, and business benefits, and how the proponent's hiring policies (including for non-English speaking people) and procurement and contract awarding procedures may influence this;
- describe the extent to which Indigenous Peoples and/or Indigenous-owned businesses may be negatively impacted by the project, including but not limited to negative impact on business sectors such as tourism;
- provide evidence to support the conclusion regarding net effect to Indigenous groups, taking into consideration community well-being, Indigenous health, and changes to current use by Indigenous groups in the area;
- provide information on how nearby residents will be made aware of noisy activity and outline a formal complaint response plan regarding noise;
- expand the quantitative risk assessment to include viable country food pathways in addition to blueberries (such as fish, game meat, game organs, birds, and plants) at all project sites where contamination of country foods may occur (e.g., at the mine site, along the haul road, and/or at the rail yard). Provide rationale for the additional pathways selected. If the quantitative risk assessment is not expanded, provide a rationale for why it is not warranted based on the problem formulation and/or preliminary model predictions;
- provide rationale for any assumptions (e.g., dose averaging) used in the quantitative risk assessment of any country foods and identify sources of any toxicology reference values used;
- assess the capacity of local communities to accommodate the additional workforce and operational demands associated with the project, including the availability of housing and accommodations, food services, health care, emergency services, policing, fire protection, and other community infrastructure that may experience increased demand; and
- update the effects assessment that was provided in the Draft EIS to account for the updated information provided in section 5.3.1- Baseline conditions for health, social and economic conditions of Indigenous Peoples.

5.4 Rights of Indigenous Peoples

The IAA affirms the Government of Canada's commitment to ensure respect for the rights of Indigenous Peoples of Canada recognized and affirmed by section 35 of the *Constitution Act, 1982*. The proponent is



encouraged to refer to IAAC's [Guidance: Assessment of Potential Impacts on the Rights of Indigenous Peoples](#), [Policy Context: Assessment of Potential Impacts on the Rights of Indigenous Peoples](#) and IAAC's Indigenous Advisory Committee [Principles to Guide the Assessment of Impacts to Indigenous Inherent and Treaty Rights](#).

5.4.1 Baseline conditions

To describe the baseline conditions, the proponent must resubmit the information that was provided in section 23.2 - Current Use of Land and Resources for the Traditional Purposes by Indigenous Persons of the Draft EIS.

The Impact Statement must include additional information to substantiate the original determination of frequency, intensity, and continuity of Indigenous use and occupancy of the project area. Any updated information on frequency, intensity, and continuity of Indigenous use and occupancy of the project area must also be provided. The proponent must consult with Indigenous Groups indicated in the IEPP to confirm the accuracy of the information presented in this section.

5.4.2 Impacts on rights of Indigenous Peoples

To describe the impacts to the rights of Indigenous Peoples, the proponent must resubmit the information that was provided in section 23.3 - Specific Issues and Concerns Raised by the Indigenous Groups and section 23.4 - Measures to Mitigate Potential Adverse Impacts on Potential or Established Indigenous and Treaty Rights or Related Interests of the Draft EIS.

The Impact Statement must update the effects assessment that was provided in the Draft EIS based on any new information provided in section 5.4.1 above.

The proponent must share studies and information about the project and its potential impacts with Indigenous groups prior to assessing the impacts of the project on their rights and collaborate with Indigenous groups in assessing impacts on those rights.

6 Contributions to inform decision making

At the decision-making phase of the IAA, should the decision maker determine that the adverse federal effects that are likely to be caused by the project are likely to be, to some extent, significant, the decision maker will decide whether they are justified in the public interest in light of the extent to which they are significant and of the factors set out in section 63 of the IAA. The requirements in this section of the Guidelines may inform the analysis of these factors.



6.1 Canada's environmental obligations and climate change commitments

IAAC, with the support of federal authorities, will analyze the project's likely effects in the context of Canada's environmental obligations relevant to this project, as well as the project's greenhouse gas (GHG) emissions in the context of Canada's emissions targets and forecasts.

The information gathered during the process steps that were conducted for the environmental assessment of the project under CEAA 2012, prior to the project's transition to the IAA, and information regarding the effects of similar development projects, suggests that the project's effects would not contribute to the Government of Canada's ability to meet its environmental obligations and climate change commitments. This is due to the project's footprint on the receiving environment (e.g., habitat loss resulting in adverse effects on biodiversity) and the potential emissions caused by the project (e.g., GHG emissions). If the proponent is of the view that the likely effects of the project contribute to the Government of Canada's ability to meet its environmental obligations and/or its commitments in respect of climate change, the proponent is encouraged to substantiate this view in the Impact Statement by describing these likely effects and the extent of their contribution (e.g., net increase in biodiversity through habitat restoration; net GHG reductions domestically through carbon capture).

6.1.1 Environmental obligations

Federal environmental obligations relevant to this project include:

- [*Convention on Biological Diversity*](#) and [*Kunming-Montreal Global Biodiversity Framework*](#) and its domestic framework: [Canada's 2030 Nature Strategy](#), as well legislations supporting its implementation including [Species at Risk Act \(SARA\)](#) and recovery strategies and action plans developed under SARA for species at risk likely affected by the project available on the [species at risk public registry](#);
- [Convention on Wetlands of International Importance Especially as Waterfowl Habitat \(Ramsar\)](#), as implemented in part under the [Federal Policy on Wetland Conservation](#) and the [North American Waterfowl Management Plan](#); and
- [Convention for the Protection of Migratory Birds in the United States and Canada](#), as implemented in part under the [Migratory Birds Convention Act \(1994\)](#), and supporting conservation objectives from Environment and Climate Change Canada's (ECCC) [bird conservation regions and strategies](#).

The Impact Statement must:

- provide a list of likely effects on species listed in Schedule 1 of SARA and their critical habitat, as well as identify the measures that will be taken to avoid or lessen those effects and to monitor them, including measures from any applicable provincial framework. Where applicable, refer to descriptions of effects already provided for VCs elsewhere in the Impact Statement. The proponent is also encouraged to include additional species that the Committee on the Status of Endangered



Wildlife in Canada has recommended for listing as extirpated, endangered, threatened or of special concern.

Where the proponent is of the view that the likely effects of the project contribute to environmental obligations, the proponent is encouraged to:

- describe plans and commitments that contribute to the above-listed environmental obligations; and
- with respect to the biodiversity⁴ obligations:
 - describe, and where possible, quantify likely changes in biodiversity resulting from the project referring to relevant guidance such as the *Convention on Biological Diversity's* [Voluntary Guidelines on Biodiversity-Inclusive Impact Assessment](#),
 - describe whether, applying the mitigation hierarchy, the project would result in no net loss or in net positive impacts on biodiversity, and
 - describe whether and how the project's likely effects will contribute to the targets identified in [Canada's 2030 Nature Strategy](#).

6.1.2 Climate change commitments

Where the proponent is of the view that the likely effects of the project contribute to Canada's climate change commitments, the proponent is encouraged to describe its plans and commitments accordingly.

The proponent may assess the project's GHG emissions following the Strategic Assessment of Climate Change (SACC) and the technical guides related to the SACC, developed by ECCC, including the [Guidance on quantification of net GHG emissions, impact on carbon sinks, mitigation measures, net-zero plan and upstream GHG assessment](#) (Technical Guide). The proponent is encouraged to keep apprised of updates to the SACC and related technical guides published by ECCC.

6.2 Sustainability

Sustainability is the ability to protect the environment, contribute to the social and economic well-being of the people of Canada and preserve their health in a manner that benefits present and future generations. Information throughout the Guidelines can be used to support the analysis of the extent to which the likely effects of the project contribute to sustainability.

⁴ The *Convention on Biological Diversity* defines biological diversity, or biodiversity, as “the variability among living organisms from all sources including, inter alia, terrestrial, marine and other aquatic ecosystems and the ecological complexes of which they are part; this includes diversity within species, between species and of ecosystems”.



6.2.1 Social and economic well-being of communities

In addition to assessing the social and economic well-being of Indigenous groups following requirements in the [Indigenous Peoples](#) section of the Guidelines, the proponent is also encouraged to assess the project's effects on the social and economic well-being of non-Indigenous peoples, including long-term well-being. To do so, the proponent must include the information required in section 4.1.4.4.3 - Labour Force Requirements of the NL EIS Guidelines. Where not specifically required in the NL EIS Guidelines, the Impact Statement must also include a description of:

- likely effects on the project's contribution to components of the Community Well-Being Index for non-Indigenous peoples located in the LSA identified as of importance through public consultations (education, labour force activity, income and/or housing);
- workforce and economic development opportunities informed by local and regional economic activities and workforce capacity, including:
 - opportunities for employment including the anticipated number and timeline of full-time and part-time positions to be created. Positions should be presented using the National Occupational Classification system,
 - anticipated workforce region of origin (i.e., local, regional, out-of-province or international employees),
 - skill and education levels required for the positions,
 - anticipated hiring policies and programs,
 - investment in training opportunities,
 - anticipated work scheduling for construction and operation (e.g., fly-in/fly-out),
 - anticipated transportation options for employees to commute to and from the project site,
 - accommodation and lodging requirements for the workforce during each project phase,
 - workplace policies and programs, including workplace policies and programs for Indigenous employment and employment of diverse population groups, codes of conduct, workplace safety, and cultural training, and
 - employee assistance programs and benefits programs;
- likely effects of the project on the local and regional infrastructure and services and their capacity; and
- economic benefits for Canadians, including Gross Domestic Product growth, tax revenue, as well as indirect benefits such as investments in the development and adoption of clean technologies and growth of innovative Canadian firms, clusters, and supply chains (e.g., by providing the critical minerals necessary for the global transition to the net zero economy).



6.2.2 Extent to which the likely effects of the project contribute to sustainability

The Impact Statement must:

- provide an analysis of the extent to which the project's likely positive effects and adverse federal effects contribute to sustainability according to the following steps:
 - identify the key VCs from section [1.3 Selection of Valued Components](#) relevant to long-term well-being to be included in the sustainability analysis, informed by Indigenous Knowledge and the project context, and
 - establish temporal boundaries, considering how long-term effects on the identified VCs could affect future generations including beyond the project lifecycle, and
 - apply the following sustainability principles to determine whether and the extent to which the project's likely positive effects and adverse federal effects result in a net positive contribution to sustainability (based on the criteria of no contribution, to low, moderate or high contribution):
 - consider interconnectedness and interdependence of human-ecological systems,
 - consider well-being of present and future generations,
 - consider positive effects and reduce adverse federal effects of the designated project, and
 - apply the precautionary principle and consider the uncertainty and risk of irreversible harm.

7 Additional information requirements

In addition to the project-specific guidelines, the Impact Statement should be informed by the requirements outlined in the Generic Requirements for Impact Statements, which include requirements on assessment methodology, general information, description of change to the project that may be caused by the environment, description of potential malfunctions and accidents that may occur in connection with the project, description of engagement with Indigenous groups, and description of public participation.

The Impact Statement must assess the project's likely cumulative adverse federal effects as well as impacts on Indigenous Peoples and their rights. Cumulative effects are changes to the environment or to the health, social and economic conditions, that are likely to result from the project's residual effects in combination with the effects of other projects and physical activities that have been or will be carried out. The proponent is encouraged to make use of the Government of Canada [Open Science and Data Platform](#), [Open Government Portal](#) and [Government of Canada Publications](#) as tools to access science, data, publications and information about development activities to better understand cumulative effects.

For adverse federal effects on VCs and impacts on Indigenous Peoples and their rights, the Impact Statement must:



- identify the VCs where residual effects are likely, even if of low magnitude, including as informed by engagement with Indigenous groups and by uncertainty regarding the effectiveness of mitigation measures;
- identify the other past, existing and reasonably foreseeable projects or activities with potential effects on the VCs that could interact with the residual effects of the project;
- where adverse residual effects on the VCs are likely to occur and to interact with other projects or activities, describe the cumulative effects on the VC, including:
 - the effects of past, existing and reasonably foreseeable projects and activities in combination with the residual effects of the project, taking into account how the effects may interact (additive, synergistic, compensatory, and masking effects),
 - a comparison of possible future scenarios with and without the project, reflecting the total cumulative effects and not just the project's contribution, and
 - consideration of any additional mitigation measures specific to cumulative effects on the VC.
- provide a rationale for any excluded VC;
- where measures to mitigate cumulative effects are beyond the control of the proponent, identify any parties that have authority to mitigate the effects and summarize any commitments or complementary measures by the other parties regarding their implementation and any associated communication plan;
- consider the ability of Indigenous Peoples to exercise their rights and culture, including where the project's incremental impacts are minor, as well as the views and preferences of each Indigenous group in carrying out and presenting the assessment. Where provided with information and in collaboration with Indigenous groups, the proponent must document the lived and told experience of the effects in relation to the ability of Indigenous Peoples to exercise their rights and culture through time; and
- provide a conclusion on the description of cumulative adverse federal effects for each relevant VC.

The proponent must prepare and submit a stand-alone, plain-language summary of the Impact Statement in both English and French.