HOWSE PROJECT

Communication Plan

HOW-CR-COMM-PLAN-11

Tata Steel Minerals Canada Limited

REVISION AND PUBLICATION		
Version#	**Date**	**Modification or Publication Data**
0	Apr 4, 2018	Draft Plan
1	Apr 9, 2018	Final Plan for Environmental Assessment
2	Dec 31, 2024	Final Plan – Reviewed with IAAC Howse decision statement conditions

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1. INTRODUCTION

As a condition of the Howse Property project release from further Federal impact assessment, condition 6.8 of the Decisions Statement for the project stipulates that: *prior to construction and in consultation with Indigenous groups, a communication plan to share information related to the Designated Project with Indigenous groups. The Proponent shall implement and maintain the communication plan up to date during all phases of the Designated Project*.

1.1 General Purpose

The content of this document reflects the work, programs and initiatives already ongoing. New ones can also be introduced based on feedback mechanisms, reflecting TSMC's commitment to continuously improve ways and further strengthen its relationships with stakeholders.

The primary purpose of this document is to ensure that stakeholders:

- receive correct and relevant information concerning the Howse Property Iron Ore Project in a timely and consistent manner.
- are consulted when necessary, in relation to the Howse Property Iron Ore Project.

1.2 Primary Audience (5 Indigenous Groups)

Local Indigenous Groups

- Nation Innu Matimekush Lac-John (NIMLJ)
- Naskapi Nation of Kawawachikamach (NNK)

All Indigenous Groups:

- Local Indigenous Groups
- Innu Takuaikan Ushuat mak Mani-utenam (ITUM)
- Innu Nation
- NunatuKavut Community Council (NCC)

1.3 Secondary Audience

- TSMC staff
- Impact Assessment Agency of Canada (IAAC)
- Other relevant authorities
- Other relevant stakeholders

1.4 General Concepts and Topics

To facilitate its application and considering the similarity in the requirements detailed in the Decision Statement for each of the points (see below), a general communication protocol will be used for:

1. Any consultation with the Indigenous Groups;
2. Any general information shared on progress on follow-up plans and on effectiveness of mitigation measures;

in relation to any topic, including, but not limited to:

- Initiation of material change(s) to the Howse Project which may result in adverse environmental effects

- Fish and fish habitat (also water quality; includes all follow-up plans, and effectiveness of mitigation measures)
- Migratory birds (also their nests, eggs and wetlands that support the birds; includes all follow- up programs and effectiveness of mitigation measures)
- Health and socio-economic conditions of Indigenous peoples (dust management, air quality and effects of dust, country foods; all follow-up plans and effectiveness of mitigation measures)
- Current use of lands and resources for traditional purposes (bypass roads, the George River herd of woodland caribou; all follow-up plans including effectiveness of mitigation measures)
- Physical and cultural heritage and structures, sites or things of historical archaeological, paleontological or architectural significance (use of cultural and other sites as a result of noise levels, cultural heritage; all follow-up plans and effectiveness of mitigation measures)
- Emergency Response Plan (ERP)

However, specific communication protocols are also necessary for:

- Blasting operations
- The discovery of unidentified structures, sites or things of historical, archaeological, paleontological or architectural significance within the Howse project area
- An accident and malfunction with the potential to create adverse environmental effect
- A transfer of ownership
- Feedback / complaints received from Indigenous groups by TSMC, including on the subject of noise, and TSMC's response.

1.5 Resources / Media Used

As much as possible, existing resources/media will be used to communicate and consult with Indigenous groups and relevant stakeholders:

- Emails between TSMC's representatives and Indigenous Groups/Relevant stakeholders
- Phone calls between TSMC's representatives and Indigenous Groups/Relevant stakeholders
- Announcements on local community radio stations
- Quarterly Community Health, Safety and Environment (HSE) Committee meetings
- Bi-annual newsletters
- Annual report, available in print and on the Internet
- Shared drive[1]
- TSMC email address info@tatasteelcanada.com to collect complaints and feedback.

1.6 Coordinates of Key Stakeholders

In order to ensure that key stakeholders can be reached in a timely manner, a list of names and contact information is kept and is updated on a regular basis.

1.6.1 Indigenous Groups

NIMLJ: (418) 585-2601	Myriam Rossignol,
	Conrad André
NNK : (418) 585-2686	Billy Shecanapish
	Lindsay Richardson

[1] A shared drive allows registered users (TSMC or Indigenous Group designates) to securely access remotely, documents uploaded to the drive.

ITUM: (418) 962-0327 or (800) 563-0327	André Michel
	Stéphanie Brisson
Innu Nation : (709) 497-8398 Innu Nation (IN)	Paula Reid
	Len Rich
NCC: (877) 896-0592 or (709) 896-0592	George Russel Jr.
	Kayla Beals

1.6.2 Archaeology

Please refer to TSMC's Cultural Heritage Control Plan Follow-up Program for more details.

Provincial Archaeology Office (PAO):	(709) 729-2462; Fax: (709) 729-0870
Naskapi Nation of Kawawachikamach (NNK):	(418) 585-2686
Nation Innu Matimekush Lac-John (NIMLJ):	(418) 585-2601
Innu Takuaikan Ushuat mak Mani-Utenam (ITUM)	(418) 962-4000
Innu Nation (IN)	(709) 497-8398
NunatuKavut Community Council (NCC)	(709) 896-0592

1.6.3 TSMC's Designated Feedback and Complaint Coordinators

In order to ensure that feedback and complaints are treated efficiently, designates key TSMC employees to liaise with stakeholders:

Community Relations Liaison	aidan.mameamskun@tatasteelcanada.com
General Email (TSMC Reception)	info@tatasteelcanada.com
Head, Community Relations	(514) 258-9116
Manager, Community Relations	(418) 409-0377
Community Liaison	(514) 764 6700, ext. 953
Manager, Environment	(514) 764-6700 ext. 705
Site Environment Team	514 764-6700, ext. 374 or 435
Security (24hrs/day, 7 days/week)	(514) 764-6700, ext. 397 or 399

1.6.4 Relevant Authorities

Impact Assessment Agency of Canada (IAAC) Senior Enforcement Officers	Mathieu.Trudelle@iaac-aeic.gc.ca; (343)-553-8418 Julie.Buron@iaac-aeic.gc.ca; (514)-792-4970
Town of Schefferville	1 (888) 828-2503

2. COMUNNICATION PLAN

General Purpose:

The purpose of this Communication Plan is to ensure that the Indigenous Groups and key stakeholders receive, in a timely manner, accurate and relevant information concerning the Howse Property Iron Ore Project.

The following describes the methodology to be followed by TSMC for this Communications Plan.

2.1 Community Health, Safety & Environment Committee

The Community Health, Safety and Environment (HSE) Committee serves as the formal mechanism for communication and cooperation between TSMC and the Indigenous Groups with respect to HSE management of the Howse deposit and the other ore deposits developed by TSMC. Among its functions, the HSE Committee serves to:

- facilitate, integrate and coordinate the involvement of the Indigenous Groups as well as appropriate and qualified organizations and businesses, in the environmental monitoring and mitigation of environmental effects;
- report and make recommendations to TSMC and the Indigenous Groups with respect to the environmental monitoring and mitigation activities for the Howse Project and TSMC's other mining areas.

What	When	Why	Whom	How	Accountability
- Quarterly Health, Safety and Environment (HSE) Committee Meeting: **Four times per year** • Contact Indigenous Groups and propose tentative dates of next meeting; general topics to be covered. • Obtain feedback on tentative dates.	One month before each meeting	• Make information relating to Health, Safety & the Environment at TSMC's mine areas easily accessible • Plan next meetings	- 1st, 2nd counterparts of the Indigenous Groups - TSMC staff: • Environment Team • Health and Safety Team • Head, Community Relations • Manager, Community Relations • Community Relations Liaison[2]	• Email and Telephone	Community Relations Manager
- Meeting Date Confirmation & Email Invitation	14 days prior to each meeting	• Ensure availability of participants • Formally invite participants	- Committee Members	• Email and Telephone	Community Relations Manager
- Send participants sufficient information by email on topics to be covered	7 days prior to each meeting	• Allow participants to prepare for meeting • Raise knowledge on subjects	- Committee Members	• Email	Community Relations Manager
- Send meeting reminder - Ask for any questions considering documentation received	2 days prior to each meeting	• Ensure awareness and attendance of the meeting • Compile questions received	- Committee Members	• Email	Community Relations Manager
- Provide an update on all relevant information: • progress on follow-up plans • effectiveness of mitigation measures • ongoing consultations • for any of the topics identified in the Decision Statement and summarized in the Generalities section or for any topic of interest.	Quarterly HSE Committee Meeting	• Have all Committee Members aware of ongoing actions	- Committee Members	• Quarterly HSE Committee meeting (in person or by videoconference)	Community Relations Manager
- Send meeting notes to all participants - Upload meeting notes on shared drive	14 days after Quarterly HSE Committee Meeting	• Ensure all present/absent have knowledge of the meeting	- Committee Members	• Email • Bi-annual Newsletter (review of Meeting topics covered)	Community Relations Manager
If the need arises: Follow-up on participants' feedback *(see Feedback and Complaint Process Plan)*					
- Summarize all consultations that took place in the previous year as well as their results	Annually	• Raise awareness about TSMC's operations and information practices	- All stakeholders - Agency - TSMC staff - General public	• Annual report (printed and on the Internet)	Community Relations Manager
- Review existing Communication Plan with key stakeholders to continuously improve process: • Verify satisfaction level of stakeholders • Make necessary adjustments - Upload revised plan on the shared drive	Annually	• Ensure that Communication Protocol answers needs of the Indigenous groups and other key stakeholders	- All stakeholders - Agency	• HSE Committee meeting • Revised Communication Protocol	Community Relations Manager

[2] In this table, Indigenous Representatives and the TSMC staff that form the HSE Committee, collectively referred to as "Committee Members"

2.2 Consultation with Indigenous Groups and Relevant Stakeholders

General purpose:

Ensure that the Indigenous Groups and relevant stakeholders are consulted on plans, their effectiveness and that of mitigation measures, etc. to adopt plans that are effective and efficient in the view of all parties.

What	When	Why	Whom	How	Accountability
- Provide counterparts a written notice of the opportunity to provide views on te subject matter (strategy, follow-up plans, mitigation measures, etc.). - The notice will include: • Subject matter/follow-up plan • Context of subject matter/follow-up plan • Impact/outcome of subject matter/follow-up plan • Reason for soliciting views • Deadline to provide views (Day 0) • Date of availability of information on the subject matter • General timeline for the subject matter • Method used to collect the views (in writing, meeting, etc.)	30 days before Day 0	• Give advance notice of necessity for views	- 1st and 2nd designated representatives of the Indigenous groups to be consulted - Relevant authorities - Relevant TSMC staff: • Environment Team • Manager, Community Relations • Community Liaison • Head, Community Relations	• Email	Community Relations Manager
- Send counterpart sufficient information by email on the scope to prepare their views and information	Maximum 28 days before Day 0	• Make information on subject easily accessible	- Indigenous Groups - Relevant authorities	• Email • Information on subject matter	Community Relations Manager
- Upload all information available on the shared drive into folder bearing the subject name	7 days before Day 0	• Raise knowledge on subject	- Indigenous Groups - Relevant authorities	• Email and Telephone	Community Relations Manager
- Send reminder of the opportunity to provide views	2 days before Day 0	• Ensure awareness of request	- Indigenous Groups - Relevant authorities	• Email and Telephone	Community Relations Manager
- Collect views and information of stakeholders	Day 0	• Obtain input and point of view	- Indigenous Groups - Relevant authorities	• Email • Data collecting template • Meeting	Community Relations Manager
Before Day 30, analyze views and information in an impartial manner, involving qualified individuals. If necessary, make adjustments to existing plans					
- Provide by email an executive summary (easy to follow) identifying adjustments made and the reasoning behind the adjustments, and the relevant adjusted follow-up plans - Upload on shared drive	By Day 30	• Keep audiences informed of progress	- All stakeholders	• Email	Community Relations Manager
- In the case of follow-up plans, provide updated follow-up plan incorporating views received - Upload on shared drive	Prior to operation	• Ensure the updated plan is available	- All stakeholders	• Updated Follow-up Plan	Community Relations Manager
- Provide update to all participants on the consultation in progress, or recently completed	Quarterly until the end of the consultation	• Have all stakeholders aware of ongoing actions	- All stakeholders - Agency	• Quarterly HSE Committee Meeting	Community Relations Manager
- Summarize all consultations that took place in the previous year as well as their results	Annually	• Raise awareness about TSMC's consultation practices	- All stakeholders - Agency - TSMC employees - General public	• Annual Report (Printed and published on TSMC's website)	Community Relations Manager

2.3 Blasting

General Purpose:

Ensure that the Local Indigenous Groups are informed of blasting to take place in delineated area as it may have an impact on noise, air quality, fauna, use of the land, etc. in said area.

What	When	Why	Whom	How	Accountability
- Inform counterparts of the upcoming blast date and time	24-48 hours prior to each blast	• Make blasting information available	- Local indigenous groups	• Email	Chief - Mining

2.4 Discovery of Unidentified Structures, Sites or Things of Interest

General Purpose:

Ensure that the Indigenous Groups and relevant authorities are informed, and updated, on the discovery of unidentified structures, sites or things of historical, archaeological, paleontological or architectural significance within the Howse Project area and other TSMC mine areas.

Note: TSMC has deployed a *Cultural Heritage Control Plan* meeting all requirements of the *Historic Resources Act* and the *Cultural Property Act*. TSMC also reaffirms in the document its intention to operate in a collaborative manner with the Indigenous Groups to preserve sites with an appropriate buffer.

What	When	Why	Whom	How	Accountability
- Give awareness session to local teams to be able to recognize what could be a structure, site or thing of historical, archaeological, paleontological or architectural significance	As soon as possible	• Raise awareness of employees on the ground	- Local teams	• Awareness session	Chief - Mining
Day 0 = Discovery of unidentified structures, sites or things of historical, archaeological, paleontological or architectural significance within the Howse Project area					
- Person who makes the discovery informs their Supervisor - Supervisor informs the Environment Team and Manager, Community Relations	Day 0 (Immediately)	• Make discovery known as soon as possible	- Supervisor - Environment Team - Manager, Community Relations	• Phone call	Chief – Mining
- Inform Indigenous groups using a written notice of the discovery - The notice will include: • Nature of material discovered • Precise location of the find - Confirmation that the discovery area will be cordoned off for the full duration of the project or until the finding is determined not to be significant by the respective Province	Within 24 hours of Day 0	• Inform of the discovery	- Indigenous Groups - Relevant authorities - TSMC staff: • Environment Team • Head, Community Relations • Manager, Community Relations	• Email	Community Relations Manager
- Provide update on situation	Quarterly until action plan is determined	• Make all stakeholders aware of ongoing actions	- All stakeholders	• Quarterly HSE Committee meeting • Bi-Annual newsletter	Community Relations Manager
- Summarize all discoveries and related Action Plan	Annually	• Raise awareness about TSMC's preservation practices	- Indigenous Groups - Agency - All TSMC employees	• Annual Report (Printed and published on TSMC's website)	Community Relations Manager

2.5 Transfer of Ownership

General purpose:

Ensure that key stakeholders are informed, and consulted if need be, when there is a transfer of ownership, care, control or management of the Howse Project, in whole or in part.

What	When	Why	Whom	How	Accountability
Day 0 = Transfer of ownership, care, control or management of the Designated Project, in whole or in part					
- Inform Agency and Indigenous Groups in writing of the transfer of ownership, care, control or management of the Designated Project, in whole or in part - The notice will include: • Nature of the change • New contact if any • Any other relevant information	Not later than 60 days after Day 0	• Keep stakeholders informed	- All stakeholders	• Email • Registered letter	Community Relations Manager
If relevant, use the Consultation with Indigenous Groups and Relevant stakeholders Communication Plan					

2.6 Accidents and/or Malfunctions with the Potential to Create an Adverse Environmental Effects

General purpose:

In a timely manner, ensure that key stakeholders are informed of an accident and/or malfunction that may have the potential to create an adverse environmental effect. Ensure also that key stakeholders are heard and voice their views.

Accidents and/or malfunctions of a certain gravity must be declared:

As per Section 6 of the Howse Project Impact Statement (April 2016), these are defined as: spills, road accidents, fire, explosives, water management failure, slope failures, accidents and malfunctions caused by exceptional natural events and Effects of the environment on the Project. Note: TSMC has deployed an Environment Protection Plan and Safety Action Plan. These plans will be engaged for incidents other than accidents and malfunctions, while engaging the Communication Plan for notification.

What	When	Why	Whom	How	Accountability
- Inform relevant authorities, Indigenous Groups and the Agency in writing of the accident and/or malfunction. The notice will include: • Description of the accident or malfunction and of its adverse effects • Precise location of the accident or malfunction • Confirmation of immediate corrective measures taken to mitigate adverse effect • Next steps in Emergency Response Plan	As soon as possible (Day 0)	• Inform of the accident and/or malfunction	- Local stakeholders - Relevant authorities	• Email and Telephone	Manager - Environment
- Inform all local stakeholders of the situation, measures taken, alternative routes, etc.	If applicable, as soon as possible, on a daily basis	• Ensure broad awareness of the situation	- Local stakeholders	• Radio announcements in Indigenous language	Community Relations Manager
- Submit a written report to the Agency. The report will include: • Description of the accident or malfunction and of its adverse effects • Precise location of the accident or malfunction • The measures taken to mitigate the adverse effect • Any views received from Indigenous groups and relevant authorities on the situation, adverse effects and measures taken to mitigate the adverse effects • Description of any residual adverse environmental effects and any modified/additional measures to be adopted - Details about the implementation of the Emergency Response Plan - Upload 30-day report on shared drive	At the latest 30 days after Day 0	• Report progress made on the accident or malfunction	- All stakeholders	• 30-day report	Manager - Environment
- Provide update on the situation and mitigation measures taken	Quarterly until mitigation measures are complete	• Have stakeholders aware of ongoing measures	- All stakeholders	• Quarterly HSE Committee Meeting • Bi-annual Newsletter	Community Relations Manager
As views received from Indigenous groups and relevant authorities need to be included in the Report, use the *Consultation with Indigenous groups and Relevant stakeholders* Communication Protocol					
- Submit a written report to the Agency. The report will include: • Follow-up on 30-day report • Changes adopted to avoid subsequent occurrence of the event • Modified or additional measures taken to mitigate and monitor residual adverse effect • Any views received from Indigenous Groups and relevant stakeholders on the situation, adverse effects and measures taken to mitigate the adverse effects • Description of any residual adverse environmental effects and any modified/additional measures to be adopted • Details about the implementation of the Emergency Response Plan - Upload 90-day report on shared drive	At the latest 90 days after Day 0	• Report progress made on the accident or malfunction	- Agency and other relevant authorities - All stakeholders	• 90-day report	Manager - Environment
- Provide update on situation and mitigation measures taken (using 30- and 90-day reports)	Quarterly until Action Plan is completed	• Ensure awareness of ongoing measures	- All stakeholders	• Quarterly HSE Committee meeting • Summary of progress report • Bi-annual Newsletter	Manager – Environment
- Summarize the situation and mitigation measures	Annually	• Raise awareness about TSMC's responsiveness	- All stakeholders - Agency - All TSMC employees - General public	• Annual Report • (Printed and published on TSMC's website)	Manager - Environment

2.7 Feedback and Complaint Process

General purpose:

Ensure that feedback and complaints from Indigenous Groups and other stakeholders are solicited. Once feedback or complaints are given, keep providers informed of how their input was taken into consideration and of the actions taken to solve or mitigate the issue reported. Note that:

- if any feedback or complaints reported constitute an emergency, the Emergency Preparedness Response Plan will apply;
- If the feedback given is simply an observation or comment, the information will be shared with the appropriate TSMC employees;
- a noise complaint will be treated in 48 hours or less.

What	When	Why	Whom	How	Accountability
- Review list of TSMC's contacts to whom complaints should be directed (Feedback & Complaints Coordinators), including a general number and email address which could become the sole contact point - Review the feedback and complaint process to ensure efficiency - Advertise internally how and where feedback or complaints should be directed	Once per year– beginning of March Or when the need arises	• Ensure knowledge of the process and contacts so that feedback is forwarded appropriately • Ensure quality of process	- TSMC employees	- Revised contact list and feedback and complaint process - Internal advertisement	Community Relations Manager
- Send stakeholders feedback and complaint process and updated contact coordinates - Upload documents on the shared drive	Once per year – beginning of April or when the need arises	• Ensure awareness of the process and of the contacts	- Indigenous Groups - Relevant authorities - Local stakeholders (Town of Schefferville, Airport, local land users, etc.)	- Email	Community Relations Manager
- Advertise externally feedback and complaint process and where feedback should be directed - Send email on process and contacts	Four consecutive months and then quarterly	• Ensure awareness of the process and of the contacts	- All stakeholders	- Radio announcements in Indigenous languages - Email	Community Relations Manager
- Remind stakeholders that their feedback on the Howse Project is welcomed and sought after	Quarterly	• Create awareness of importance of feedback	- Indigenous Groups	- Quarterly HSE meetings - Bi-annual newsletter	Community Relations Manager
- The Coordinator logs the feedback or complaint in a centralized file on shared drive:[3] • Date and time of feedback • Name of person giving feedback • Group (Indigenous, authorities, local users, etc.) • Nature of feedback (noise, dust, blasting, fauna, general comment, etc.) - A noise complaint needs to be treated within 48 hours - Name of the Competent Resource who will treat the feedback/solve the situation (self, other departments or resources) sought after	Feedback received: Day 0	• Ensure to have knowledge and details on the feedback and the status of treatment	- Stakeholder who gave the feedback or made the complaint	- Centralized feedback/ complaint log	Community Relations Manager
- The Coordinator transfers the feedback or complaint to a Competent Resource if needed, with the explanation and the deadline to start treating the feedback (3 days generally or 2 if it is about noise)[4] • Date and time of referral to the Competent Resource • Follow-up actions (24 hours, 48 hours until action plan is determined) • Final outcome • General comments - If needed, the Coordinator communicates with the person giving feedback or complaint to obtain clarity	As soon as possible	• Ensure that feedback is treated promptly	- Competent Resource	- Email and Telephone	Community Relations Manager

[3] If the receiver is someone other than one of the Coordinators, he/she needs to reassure the stakeholder that the feedback or complaint will be treated quickly by one of the Coordinators. He/she must then transfer the feedback or complaint to one of the Feedback & Complaint Coordinators.
[4] A noise complaint needs to be treated within 48 hours

What	When	Why	Whom	How	Accountability
- Coordinator communicates with the Competent Resource to have an update on the feedback or complaint and updates the log - Coordinator contacts the stakeholder to give an update	24 hrs after Day 0	• Ensure follow up	- Competent Resource - Stakeholder	- Email and Telephone	Community Relations Manager
- Coordinator communicates with Competent Resource to have an update on the feedback or the complaint - Coordinator updates the log - Coordinator contacts the stakeholder to give an update of the treatment	48 h after Day 0, until an action plan is put into place	• Ensure follow up	- Competent Resource - Stakeholder	- Email and Telephone	Community Relations Manager
- Coordinator communicates with the Competent Resource to have an update on the action plan - Coordinator contacts the stakeholder to give an update of the treatment	Weekly until the feedback or complaint is addressed	• Inform stakeholders of how feedback or complaint is treated	- Competent Resource - Stakeholder - TSMC's employees who need to know status - Other relevant stakeholders	- Email and Telephone	Community Relations Manager
- Provide update on the treatment of the feedback or complaint received	Quarterly until the feedback or complaint is addressed	• Inform stakeholders on how feedback or complaint is treated	- All stakeholders	- Quarterly HSE Committee meeting - Meeting notes - Bi-annual Newsletter	Community Relations Manager
- Summarize the feedback and complaints received and how they were addressed	Annually	• Raise awareness about TSMC's responsiveness	- All stakeholders - Agency - All TSMC employees - General public	- Annual report (printed and on Internet)	Community Relations Manager