



Toronto Office:
5 Church Street
Toronto, Ont.
M5E 1M2

Date: November 20, 2025

Attn: Vicki Ficzero
Project Manager, NL&L Satellite Offices
Impact Assessment Agency of Canada
Government of Canada
By email: vicki.ficzero@iaac-aeic.gc.ca

Re: Request to Transition the Joyce Lake Project from Impact Assessment Under CEEA-2012 to IAA-2019 Using New Tailored Impact Statement Guidelines

Dear Ms. Ficzero,

Many thanks for your assistance over the past many months.

Joyce Direct Iron Inc. (JDI) formally requests that the Impact Assessment Agency of Canada (IAAC) on December 31, 2025, transition the Joyce Lake Direct Shipping Iron Ore project (Joyce Lake), from impact assessment under the Canadian Environmental Assessment Act - 2012 to the Impact Assessment Act - 2019.

Following JDI's request on May 27, 2022, IAAC extended the three-year legislated time limit for Joyce Lake, to provide the required information or studies for impact assessment under the Canadian Environmental Assessment Act – 2012, to December 31, 2025.

JDI cannot comply with the time limit extension of December 31, 2025, as the \$3,000,000 required to prepare a Combined Environmental Impact Statement (Combined EIS) and other required information for submission to IAAC and Newfoundland and Labrador, Department of Environment, Conservation and Climate Change, (NL-ECCC), could not be raised.

Transition of the Joyce Lake project, on December 31, 2025, to impact assessment under the Impact Assessment Act - 2019, using Tailored Impact Assessment Guidelines with no additional requirements, will facilitate JDI raising funds to complete the work plan, during a period of much improved capital markets.

JDI will comply with the attached work plan to ensure the Combined EIS, is submitted to IAAC and NL-ECCC, including a period for review and supplying of additional required information, before the provincial registration deadline of November 03, 2027.



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JDI will also continue to coordinate with IAAC and NL-ECCC and consult with designated Indigenous Groups and it also confirms entering into a mutually agreeable Charter with IAAC, relating to the attached work plan.

If any additional information is required please contact me a any time

Yours Truly

<original signed by>

Allan Gan
Project Manager, Joyce Lake Project
Joyce Direct Iron inc.

cc:

- John Reynolds, Manager NL-ECCC
- Shauna O'Brien, Team Leader, IAAC
- Jill Adams,
- Joanna Tombs,

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Attachments:

1. Work Plan
2. Summary Background
3. Expenditures and Benefits
4. IAAC and NL-ECCC Prior Key Dates
5. Indigenous Groups
6. Technical reports Filed on Sedar+



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2. Summary Background

The Joyce Lake deposit is in Newfoundland and Labrador, approximately 20km NE of Schefferville, a regional town in Quebec, which is close to the Quebec based, Indigenous communities of Kawawachikamach and Matimekush lac John.

The Joyce Lake project is a small open pit planned to produce 2.5 million tonnes of iron ore products per annum with the mined ore being dry crushed and separated by dry screening into lump and coarse fines.

The project produces DSO or Direct Shipping Ore. The lump ore will be partially dried and stored for winter transportation while the coarse fines will be transported immediately during summer. The process uses dry crushing; no tailings will be created and plant at the mine site will be semi-mobile and minimal.

The project will take 18-24 months to construct, will operate for seven years and physical closure will take one year.

The open pit, for safe operation, will require drainage of Joyce Lake a relatively small unproductive lake for fishing, which will be recharged, starting in production year five, creating a deeper lake which will be more productive for fish habitat.

A Joyce Lake NI43-101 FS was completed in 2015 and in December 2022 it was updated. Both documents are available on SEDAR+. The Changes between the two FS's were illustrated in two additional documents, prepared by JDI, which were circulated to IAAC and NL-ECCC as well as all five IG's. Both IAAC and NL-ECCC determined the Changes did not require modifications to guidelines.

Mine construction will require a maximum of 310 construction employees and 269 operations employees. Lump and coarse fines products will be transported over a new haul road and rock causeway across Iron Arm waterway, 43 km by truck to an existing railroad, and then railed to the port of Sept-Îles for international ocean shipment and sale



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3. Expenditures and Benefits

To date, over C\$50 million has been expended on the Joyce Project, including:

- Prospecting to deposit discovery,
- Resource definition drilling,
- Preliminary economic assessment,
- A Joyce Lake project NI43-101 FS,
- EA baseline data collection for IAAC and NL-ECC,
- Data collection from 11 additional requested studies,
- IAAC Draft EIS submitted May 21, 2021,
- Consultation with IG and the public,
- Extensive interaction with IAAC and NL-ECC, and
- An updated Joyce Lake project NI43-101 FS. December 2022

Expenditures over the past 15 years have contributed significant economic benefit to Newfoundland and Labrador as well as Quebec, including the two local IG communities. At peak the Joyce Project has 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).

Over the 10 years of the Joyce Lake project, including construction, sustaining and closure capital as well as operational cost, JDI expects to expend approaching C\$2Bn while generating a maximum of 310 direct construction over approximately two years and 269 direct operational jobs, over seven years.

Additional substantial indirect jobs will also be created both in the Schefferville region as well as further afield.

Apart from generating a significant number of direct and indirect jobs, the Joyce Lake project will purchase substantial mobile equipment for the open pit, truck haulage, rail haulage in the form of cars and locomotives as well as prefabricated buildings and semi-mobile crushing plants. Purchase of all this equipment, as new or used, will likely be from Canadian sources, which together with use of existing and new infrastructure at the port of Sept-Iles will align with federal government policies.



4. IAAC and NL-ECCC Prior Key Dates

IAAC and NL-ECC EA Prior Key Dates	
Activity	Dates
IAAC	
Joyce Lake Project initial registration with IAAC	Nov 19, 2012.
IAAC EIS final original EIS guidelines issued	March 5, 2013
EIS Project baseline data collection	2011 to 2014
Joyce project hiatus during difficult iron ore market	late 2015- early 2021
JDI compliant Draft EIS submission to IAAC (1 st)	May 21, 2021.
IAAC Draft EIS conformity review complete (1 st)	July 05, 2021.
JDI requests IAAC to extend Joyce Lake under CEAA-2012 to December 31, 2025	May 27, 2022.
IAAC extended the time limit under CEAA-2012	July 28, 2022
JDI compliant Draft EIS submission to IAAC (2 nd)	October 1, 2022
IAAC Draft EIS conformity review complete (2 nd)	November 7, 2022
IAAC completes Draft EIS Technical Review and issues 138 IR's	June 7, 2023
JDI submits Application to transition Joyce Lake EA from CEAA-2012 to IAA-2019 on December 31, 2025, using TISG's	November 20, 2025
NL-ECC	
Project original registration with NL-ECC	Oct 15, 2012.
NL-ECCC EIS original EIS guidelines issued	Dec 13, 2013.
NL-ECCC original registration expiry	Nov 18, 2016
JDI submits Joyce project re-registration to NL-ECCC	May 21, 2021
NL-ECCC issues final EIS guidelines	August 12, 2022
NL-ECCC grants the second one-year extension	Nov. 03, 2025
Joyce registration with NL-ECCC registration terminates	Nov 03, 2027



5. Indigenous Groups

IAAC Designated Indigenous Groups Consulted	
Innu Nation	IN
The Innu Takuaikan Uashat mak Mani-Utenam	ITUM
Naskapi Nation of Kawawachikamach	NNK
Innu Nation of Matimekush-Lac John	MLJ
NunatuKavut Community Council	NCC

JDI consultation and communication with IG's										
IG	2011 to 2021					2022 to date				
	Emails	Letters	Phone call	Meeting	Total	Emails	Letters	Phone call	Meeting	Total
IN		3	2	6	11	39	21	5	17	82
ITUM	3	7	2	4	16	26	22		10	58
NNK	2	23	1	20	46	58	32	3	15	108
MLJ	1	18	2	12	33	59	25	3	11	98
NCC	1	6	1	1	9	38	20		8	66
Totals	7	57	8	43	115	220	120	11	61	412

Notes:

- *2022 to date meetings include videoconferences*
- *email strings are counted as one email*



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6. Technical Reports filed on Sedar+

NI 43-101 Technical Reports on SEDAR+	
Activity	Dates
Independent Technical Report, Attikamagen Iron Project	released Jan 21, 2011.
NI 43-101 Technical Report, Mineral Resources Estimate	released Apr 18, 2013.
Preliminary Economic Assessment, Joyce Lake Project	released May 8, 2013.
Mineral Resource Update, Joyce Lake DSO Iron Project	released Apr 17, 2014.
Feasibility Study, Joyce Lake Direct Shipping Iron Ore Project	released Apr 14, 2015.
Feasibility Study Joyce Lake project - Updated	released Dec 2022