

March 30, 2021

M. Marc Croteau, sous-ministre
Ministère de l'Environnement et de la Lutte contre les changements climatiques
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Object : Application for an attestation of exemption to the Environmental and Social Impact Assessment and Review Process for an Isolated Landfill Site (ILAS) for a camp for up to 50 people

Mr Croteau,

Since June 2012, Commerce Resources Corp. has regularly obtained attestation of exemption for the use of an isolated landfill site (ILLS) to burn waste. This waste is produced on a camp ("Camp Valcourt") which is located near Lake Le Moyne, on the territory administered by the Kativik Environmental Quality Commission (KEQC). We would like to obtain this certification again for future years. The information for this application is provided below.

Identification du promoteur	
Nom : Commerce Resources Corp.	
Adresse : Suite 1450 – 789 West Pender Street, Vancouver, Colombie-Britannique, V6C 1H2	
Nom et fonction du ou des signataires autorisés à présenter la demande : Darren Smith	
Numéro de téléphone : 418-573 0443	Numéro de téléphone (autre) : -
Courrier électronique : darren@dahrouge.com	
Numéro de l'entreprise	
Numéro d'entreprise du Québec (NEQ) : 1165888919	
Identification et localisation du projet et de ses activités	
The ILLS project is located near Lake Le Moyne, about 130 km south of Kuujjuaq.	
Coordinates : UTM 535400E; 6309600N (Z19) Latitude : 56°55'40"N Longitude : 68°24'58"W	

Description du site visé par le projet
<p>The camp is located in a completely natural area, far from any village or development. The camp can accommodate up to 50 people and is located north of the 55th parallel in a location that is not accessible by road. The burn site is located at a low elevation, in an open area in a forested area (mostly black spruce and larch). This site has already been in use since 2012 as it has already been exempted for an impact assessment. The site has also been inspected in the past by the MELCC to ensure that it complies with the regulations</p>
Calendrier de réalisation
<p>The site is required for exploration work that will begin in July 2021. The work will continue until October / November</p>
Plan de localisation
<p>The attached figures show the location of the exploration site and the ILLS.</p>

Description sommaire du projet et des variantes de réalisation
<p>Dahrouge Geological Consulting Ltd. is expected to continue exploration activities near Lac le Moyne on behalf of Commerce Corp. over the next few years. Field activities have required the establishment of a camp for up to 50 people, although we have only had programs of less than 20 people since 2013. The camp could be open in the winter and/or summer, mostly for less than six months a year, but we have the required permits to remain open year-round. We want to continue to burn the waste generated at the camp on-site to reduce transportation requirements and associated emissions, costs and the amount of waste sent to the Kuujuaq site. Our previous exemption ended in 2017 (N/Ref.: 3215-14-015).</p>
<p>The burning of waste is done according to the specifications of the Regulation respecting the burial and incineration of residual materials and this regulation will always be respected in the future. Only the waste permitted in the regulation is burned and the ashes are collected and sent to the authorized site in Kuujuaq with the non-organic waste.</p>
<p>The amount of ashes produced varies according to the occupancy rate of the camp. We estimate that we do not produce more than 1 m³ of ashes per month. The ILLS will be surrounded by a firebreak at least 15 m wide and free of vegetation.</p>
<p>Prior to burning, waste is collected in large garbage containers. Recyclable materials and hazardous waste, such as batteries, are not burned on site and are collected separately in clearly marked containers for proper disposal according to regulations.</p>
<p>The LETI will be in the same location as it was during the 2012-2019 period, approximately 150 m from any watercourse or water body, and will have the same characteristics. The burn area will be</p>

visible from the main camp. We want to be able to observe the burn site at all times to ensure the safety of the surrounding area. A map showing the location of the ILLS is attached.

The volume of waste we want to burn is about 5 bags per week. All plastics and cans are sent for recycling or disposal at the Kuujuaq site if it is not possible to recycle them. We obtain approval from the Kuujuaq administration to use their site before the start of each exploration program. We also meet regularly with the Nayumivik Landholding Corporation, the mayor of Kuujuaq, and the Makivik Corporation to update them on the status of the project as a whole.

The burn site will be monitored regularly to ensure that wind or animals do not create disturbances. It will also be cleaned regularly to ensure a clean environment. We hope to maintain the fire for as long as the camp remains active. At the end of the activities, the site will be restored to its natural state. All remaining debris will be removed and vegetation will be replanted, if possible, or conditions that encourage vegetation growth will be put in place. We will restore the soil to its natural state at the end of each program.

Objectifs et justification du projet

The project allows the burning of waste from the exploration camp on site and thus avoids the transportation to Kuujuaq. It also allows for the regular burning of waste and prevents it from accumulating for weeks on end, thus attracting wildlife.

Description des principaux impacts appréhendés du projet sur le milieu récepteur

The impacts of burning are local and punctual. They consist of smoke and soot emissions during the burning process. Positive impacts are expected due to the reduction of waste transported and sent to the Kuujuaq site, as well as the reduced possibility of encountering bears where the waste would have been stored before being transported out of the camp. Therefore, the burn site improves the safety of the camp.

Émission de gaz à effet de serre

A reduction in GHGs is expected due to the reduction in waste trucking.

Attached documents

Please find the following documents included in this mailing:

- Camp, location and Property maps;
- Satellite imagery showing the proposed burn site already in operation;
- Letter from Commerce Resources Corp. authorizing Darren L. Smith to submit this application;
- A check in the amount of \$1,459 to cover the application analysis fee.

Please do not hesitate to contact me (darren@dahrouge.com, 418-573-0443) or Ann Lamontagne (ann@lamont-expertconseil.com, 418-928-9028) if you have any questions or concerns.

Please receive, Mr. Croteau, our best regards.

Original signed in the French Version

Darren L. Smith, M.Sc., P.Geo.

Project Manager, Ashram Rare Earth & Fluorspar Project
COMMERCE RESOURCES CORP.

Senior Geologist / Manager

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