HOWSE PROJECT

Cultural Heritage Control Plan

HOW-CR -FUP-09

Tata Steel Minerals Canada Limited

REVISION AND PUBLICATION		
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1. CULTURAL HERITAGE CONTROL PLAN

1.1 Introduction

Tata Steel Minerals Canada has conducted a number of archaeological surveys, as part of project Environmental Impact Assessments and other work planning (Elross Lake, Kivivic, Goodwood, Howse, Timmins-Goodwood Haul Road) relating to the Direct Shipping Ore Project (DSO).

Some archaeological remains and cultural heritage remains, have been found in the area of the DSO site, and include:

- Prehistoric stone tools dating back to 3500-2500 before the present (BP), tool-making remains and prehistoric camps (stone fire pit structure and charcoal);
- 20^{th} century historic resources including an old mining camp.

In order to assist workers, particularly those involved in field work, TSMC has undertaken to establish a protection plan for archeological and historical resources in compliance with:

1. Federal laws and provincial laws of Newfoundland and Labrador and of Québec;
2. Commitments to Aboriginal groups impacted by our activities.

1.2 Legal Framework

TSMC will comply with all legal requirements in the event of a significant discovery. Under Federal and Provincial law:

- archeological artifacts and other cultural remains must not be moved or removed without the permission of a professional archeologist with a ministerial mandate;
- work must stop until the authorities have decided on the protective measures to be taken before the work continues;
- protective measures must be put in place;
- the site must be clearly identified and delimited and the structures covered with canvas to protect them; and
- all pedestrian and vehicular traffic is prohibited.

1.3 Aboriginal Consultation

Beyond the requirements of the *Historic Resources Act* and the *Cultural Property Act*, TSMC's operations must be performed in a collaborative manner with the communities with which we work. Certain sites (ex. Irony Mountain) are of particular value to Aboriginal groups and as such we apply appropriate buffer areas to our operations.

1.4 Operational Preparation

During all phases of the Project, it is imperative that we identify, document, preserve and protect any cultural heritage resources that may occur in close proximity to our operations, in accordance with regulatory requirements.

All discoveries must take place in accordance with the *Historical Resources Act* (NL) and the *Cultural Property Act* (Quebec), and in doing so several steps must be taken as archeological artifacts and other cultural remains must not be moved or removed without the permission of a professional archeologist with a ministerial mandate.

1.4.1 Features with High Archaeological Potential

Some features are a stronger indication of archaeological potential than others. The following list presents types of features where one might me more likely to encounter an archaeological or cultural heritage site:

Elevated topography
Higher ground and elevated positions - surrounded by low or level topography - often indicate past settlement and land use. Features such as eskers, drumlins, sizeable knolls, plateaus next to lowlands, or other such features are a strong indication of archaeological potential.

Pockets of well-drained sandy soil, especially within areas of heavy soil or rocky ground
Sandy, well-drained soil - in areas characterized by heavy soil or rocky ground.

Distinctive land formations
Waterfalls, rock outcrops, rock faces, caverns, mounds, etc.
They were often important to past inhabitants as special or sacred places. The following sites may be present – or close to – these formations: burials, structures, offerings, rock paintings or carvings.

Resource extraction areas
For: food or medicinal plants e.g., migratory routes, spawning areas, scarce raw materials e.g., quartz, copper, ochre or outcrops of chert, or resources associated with early historic industry e.g., fur trade, prospecting, mining.

Early historic settlement
Early Euro-Canadian settlement such as isolated cabins.

Early historic transportation routes,
Trails, passes, roads, railways, portage routes.

1.4.2 Types of Cultural Heritage Resources

- Evidence of former occupation (circle of stones, raised earth, stone structures, remains of campfires as evidenced by the presence of charcoal or bone, wooden poles, fabric)
- Tools such as arrowheads, knives, scrapers, hooks, spears, etc.
- Burial sites (identifiable with piles of stones, small rectangular mounds, or in more recentyears small fences or structures)
- Wooden structures (canoe racks, skin or meat drying racks, sleds, etc.)
- Places of worship or commemoration (identifiable with statues or crosses)
- Tools (pots, utensils, knives, traps, guns or ammunition, metal pans)
- Evidence of contemporary dwellings (post-1930's) and associated artifacts
- Paleontological resources (fossil remains)

Please see TSMC pamphlet "Cultural Heritage Protection" for photos of archaeological and cultural heritage remains found in the DSO Project area.

1.5 Cultural Heritage Protection Procedures

TSMC Environment will monitor all major earthworks and investigate all reported cultural heritage items.

Before they begin, TSMC Environment and Site Supervisors will conduct a **preliminary ground survey** of the area where earthworks are planned, in order to:

- verify the archeological potential of the area to be disturbed; and
- visually scan the area for archaeological remains, particularly in zones with a higher archaeological potential.

The following procedures will be followed by any worker conducting, or any Manager/Foreman overseeing, work in the field:

In the event of **discovery** of a cultural heritage resource:

1. the On-site Environment Representative will be notified immediately;
2. work boundaries must be moved to accommodate protection of cultural objects. In this manner, all work at the location of the discovery will cease immediately;
3. a 30m buffer zone will be recreated around the discovery site until further notice by regulatory authorities;
4. the On-site TSMC Environmental Representative will contact the TSMC Environmental Director, who will then contact the Provincial Archeologist and the Community Affairs Manager, who will contact Aboriginal groups within 24 hours of the discovery;
5. Under **no circumstances** will:
    - work be carried out in the area of discovery;
    - the resources in question be removed, moved, or otherwise tampered with;
    - material be removed unless authorized under a written permit.
6. If cultural property is found during the operation of heavy equipment, the **equipment must not be moved** as physical evidence may be destroyed.
7. The site (including equipment if applicable) will be secured with flagging tape or other appropriate means. The suspected remains are to be covered with a tarp.
8. If blasting is necessary in the vicinity, precautions must be taken to ensure shock waves do not disturb the site. If necessary, protective cover shall be given to the site under the supervision of an approved archeologist.
9. In the event of discovery of suspected **human remains** or burial sites:
    - work in the immediate area will be suspended;
    - site managers and the TSMC Environmental Representative will be notified immediately.
    - Police authorities (the Royal Newfoundland Constabulary (if in NL) or the Sûreté du Québec (in in Qc) must be notified.
10. A **report** will be completed by the on-site Project Manager/Environment Representative and Environmental Specialist and will include the following information:
    - cultural object discovered;
    - name of discover;
    - parties notified;
    - procedures followed to protect the object.

1.5.1 Organizations to Contact

Following a discovery, two organizations may be contacted, based on the location of the discovery.

Following this, a qualified individual will conduct an assessment of the location of the discovery.

For a cultural heritage site discovered in Newfoundland and Labrador, TSMC will contact:

1. Provincial Archaeology Office (PAO)
   (709) 729-2462; Email: JamieBrake@gov.nl.ca
2. Nation Innu Matimekush-Lac John
   (418) 585-2601;
3. Naskapi Nation of Kawawachikamach
   (418) 585-2686;
4. Innu Takuaikan Uashat mak Mani-Utenamm, Musée Shaputuan
   (418) 962-4000;
5. Innu Nation (of Labrador)
   (709) 497-8398; and
6. NunatuKavut Community Council
   (709) 896-0592.

For a cultural heritage site discovered in Quebec, TSMC will contact:

1. Ministre de la Culture et des Communications
   (418) 698-3500, ext. 9220; Email: Marie-Claude.Hamel@mcc.gouv.qc.ca
2. Nation Innu Matimekush-Lac John
   (418) 585-2601;
3. Naskapi Nation of Kawawachikamach
   (418) 585-2686;
4. Innu Takuaikan Uashat mak Mani-Utenamm, Musée Shaputuan
   (418) 962-4000
5. Makivik Corporation
   (418) 522-2224.