

IR Number

Source: Yellowknives Dene First Nation

To: Avalon Rare Metals Inc.

Subject: Closure and Reclamation

Preamble: The Overview of the Closure and Reclamation section (11.1) states “Post-closure monitoring will be limited to evaluating the success of the re-vegetation effort”. This statement leads one to believe that post-closure monitoring will not include water quality, tailings cap stability, etc. The company cannot unilaterally limit what they will monitor at this point. The need for post closure monitoring will be directed by regulators, consultation with First Nations, and most importantly, the final closure plan. Post closure monitoring must be designed to evaluate the success of the closure measures.

Request: Avalon Rare Metals Inc. must, in its overview, clearly state what, at a minimum, they are committing to monitor post closure.

IR Number

Source: Yellowknives Dene First Nation

To: Avalon Rare Metals Inc.

Subject: Closure and Reclamation

Preamble: The Reclamation Strategy for the Tailings Management Facility (11.2.2) states that “Progressive reclamation will be implemented to the greatest degree possible”. YKDFN find this statement vague, unclear and not helpful in understanding what measures will constitute ‘progressive reclamation’ and lessen the environmental remediation required at closure.

Request: Avalon Rare Metals Inc. must describe what is meant by ‘progressive reclamation’, providing clear examples of how (and when) they intend to implement this over the course of the mine’s life.

IR Number

Source: Yellowknives Dene First Nation

To: Avalon Rare Metals Inc.

Subject: Closure and Reclamation

Preamble: The Reclamation Strategy for the Tailings Management Facility (11.2.2) states that “Post-closure monitoring will include an annual inspection of the TMF for a prescribed period to confirm the completed closure measures are meeting expectations”.

Request: Avalon Rare Metals Inc. must describe for what period of time they are committed to annually inspect and manage potential issues.