



**ENVIRONMENTAL PREVIEW
REPORT FOR KETTLE HILL
FARMS ABATTOIR**

Registration 2105

Honorable Bernard Davis

Department of Environment and Climate Change

Prepared by Kettle Hill Farms

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1. Name of Undertaking

Kettle Hill Farms Abattoir

2. Proponent

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3. The Undertaking

This undertaking is in response to a provincial call for the construction and operation of Provincially licensed abattoirs within Newfoundland and Labrador. I am submitting this '*Environmental Preview Report*' (EPR) to outline additional guidelines required by the Honorable Derek Bennett, former Minister of Department of Environment and Climate Change. The completion of the EPR will provide additional information concerning the construction and operation of the Kettle Hill Farms Abattoir located in Hopeall, Trinity Bay. Kettle Hill Farms Abattoir will service the immediate area with custom butchering/secondary processing and receive animals from the remainder of the island if the process allows and the demand is obtainable.

Being a 4th generation farmer that farms and transports sheep, swine and beef cattle, I am fully aware and appreciate the need to have access to proper slaughtering and packaging facilities throughout the island. My plan supports the provincial livestock sector expansion and sustainability of safe food within the province. With government investments and initiatives such as making beef cattle available to producers and the development of certified abattoirs in Newfoundland and Labrador collectively we can work towards self-sufficiency,

safe local meat products which in turn is also a step forward to reducing greenhouse emissions by reducing the amount of meat we import to the province.

4. Description of the Undertaking

The Kettle Hill Farms Abattoir will consist of a new permeant build located in Hopeall, Trinity Bay, Newfoundland and will utilize an area of approximately 150ft X100 ft. The location of Kettle Hill Farms Abattoir is a result of necessity and could not be more perfect. It has an already established barn next to the abattoir which is critical in the wellbeing of the animals. Animals that are awaiting further processing can be comfortably housed for a short period of time. The ability to not have to transport animals from an alternate location and the ability to easily transport compromised animals to the abattoir is paramount when following the Humane Transportation of Animal Regulations. Less travel time for animals leads to less stressed animals, which is in line with the values of Kettle Hill Farms plan to make the wellbeing of animals a priority.

This undertaking will service all livestock producers within the province and will have the capacity to produce and provide secondary processing of white, red and swine meat year-round. The operation of the undertaking will be in full compliance with province and federal regulations.

4.1 Geographical Location/Physical Components/Existing Environment

The site of the undertaking will be located on Crown Land (Lease # 37381) Route 80, Hopeall Trinity Bay, next exit after Trout Farm Road. Hopeall is not a municipality but rather has a Local Service District (LSD) as its governing body. This is the preferred choice of location as it has been used for agricultural purposes such as farming and forage since 1979. It has an existing 140ft x 30ft barn on established pasture land, is located on the main highway for ease of livestock transportation and is adequately and safely distanced away from residential, social and recreational environments. The already established barn will be able to house animals waiting for slaughter if necessary and will allow for proper and safe flow of animals to the abattoir. The site has an artesian water supply and access to electricity,

which decreases the cost within the construction phase. Attached are aerial photos indicating undertaking location, the route of access, nearest community, businesses and nearest bodies of water. A septic system has been designed and had been approved however, it has since been revoked pending approval of EPR. A site plan indicating the location of abattoir, established barn, artesian well, proposed septic field and access road is also attached.

All offal, Specified Risk Material (SRM) and non Specified Risk Material (non SRM), besides edible offal will be trucked to the Provincial agricultural incinerator located on Brookfield Road, St. John's, Newfoundland. Edible offal will go for animal feed, to the mink ranch located in Cavendish, Newfoundland.

This undertaking will be utilizing leased land (Lease # 37381) for the foreseeable future. We are confident that the construction and operation of this undertaking will have very minimal to no effects on the physical/biological environments within the location of the undertaking site or access road (135m).

As stated, the current location has previously been used for agriculture purposes, therefore, making the land very suitable for this undertaking. The parcel of land that the undertaking occupies consists of mainly rough terrain, minimal trees, no bodies of water and was landscaped slightly to be suitable. The nearest body of water is approximately 420m on the same side of the road from the undertaking. This body of water is not a water source for residential or public dwellings. The nearest residence which is also within the nearest community of Hopeall is approximately 983m; Stillwater RV Park is approximately 421m on the opposite side of the road of the undertaking. The surrounding land of the undertaking does not possess any other social environments. As per the Meat Inspection regulation regarding location of an abattoir, this undertaking does exceed the reasonable offset of 100m (330ft) minimum. Please refer to the attachments outlining an accurate aerial photo of environments and areas that while are a safe operating distance away have been brought to the proponents' attention as being a concern to the public along with their associated distances from abattoir.

4.2 Construction

Construction of the abattoir had commenced and remains between Stage 1 and Stage 2. Construction is currently stopped pending EPR approval. This undertaking plans to

proceed construction the later part of October/Early November, 2021 and begin operation as soon as possible thereafter, again, pending EPR approval.

The structure will be 50ft x 60ft slab on grade concrete with walls constructed of insulated concrete forms (ICF) and rebar. There will be a 400 amp, 3 phase electrical service, no windows, steel doors, metal roof and metal siding. It will contain a proper and professionally installed ventilation system. Animals will be received in a temporary pen, 20ft x 50ft constructed of concrete and metal. This will hold only animals to be processed within 24 hours. This is located along side of the building, within close proximity of the receiving door of the building. Employees will have access to lunch room and washroom facilities on site. There will be no hazardous materials onsite with the exception of household bleach which will be utilized for clean up and sanitization. This will be stored in a designated storage area when not in use.

During processing, offal such as blood, bone, animal trimmings, solid waste materials such as Specified Risk Materials (SRMs) and non-Specified Risk Materials (non-SRMs) will be collected and stored in accordance with regulation within the provinces Meat Inspection Act, in designated containers, which will be sealed, properly labelled and frozen until ready to transport each material to its designated location.

The planned stages of construction are as follows:

Stage 1- Consist of landscaping, building preparation, approvals (e.g., septic design, access roads), acquiring contractors and labor.

Stage 2- Construction of the undertaking, plumbing, electrical, installation of septic system.

Stage 3- Purchasing and installation of processing equipment, training personal and rework of existing barn allow ease of animal flow to abattoir (e.g. animal corrals).

Stage 4- Develop all necessary plans, acquire licenses for processing, consultations with regulated bodies, recruit trained personal and begin operation.

Stage 5- Review of all operational and processing procedures, document control and record keeping. Constant communication with industry and regulators and act as a liaison with customers and other livestock producers.

These stages will be used as a guideline and will overlap in some timeframes as the stages bridge together. The total estimated timeframe to complete construction and begin operation is approximately 4 months.

There are no resource conflicts such as hunting or water sources. The location of the undertaking is located on agricultural land owned by the owner of the undertaking and next to the main highway. In the event of a mechanical breakdown of equipment during land clearing, proper clean up procedures would be the responsibility of the contractor however, the proponent will verify that proper procedures are being followed. The impact to the environment during this phase would be considered very low risk and every effort to maximize environmental protection would be implemented. Such as ensuring equipment is inspected regularly and maintained and operating efficiently. All workers on the site will be made aware of precautions to take such as, notifying myself if an environmental issue arises, to halt work should they feel there is something being conducted that could potentially jeopardize the wellbeing of the surrounding environment and will always be aware of any regulated bodies that should be contacted given an environmental emergency. The proponent is confident that this undertaking can be constructed and operated under efficient and environmentally sound conditions.

The estimated number of employees to be hired will be depend on the stage of construction. Priority will be given to qualified persons residing in the community or neighboring communities.

Construction Phase:

During the construction phase there will be a combination of direct hires and contracting out work.

Direct hires:

Laborers. NOC code 7611

Contracted work:

Carpenters- NOC code 7271

Electrician/Concrete/Plumbers- NOC code. 720

Heavy Equipment- NOC code. 7302

The proponent foresees himself and one other laborer during the construction phase, and the contracted work will be unknown as this will depend solely on the contractor and the number of employees they require.

4.3 Operation and Maintenance

For the purposes of this EPR, Kettle Hill Farms has outlined below the complete flow through description of abattoir operations from receipt of cattle from the source, through to processing, storage and transportation and marketing. Each species of animals will have its own unique process flow specific for them; Swine and white meats would have their own flows. Those plans will be found within Kettle Hill Farms standard operating procedures. Those plans will be found within Kettle Hill Farms standard operating procedures. The flow through of large livestock (cattle), swine and small livestock (white meats) can be viewed on the Level 1 floor plan attached.

Process Flow for Slaughtering of Cattle

1. Animal is brought to abattoir.
2. Put into holding pens for few hours or overnight.
3. Animals are taken off feed for 12-24hrs but can have water entire time.
4. Animals are assessed for general health (injured animals should be processed right away).
5. Animals are coaxed in knock box using bucket of feed.
6. Animals are made unconscious using Captive bolt gun.
7. Side of the knock box will be lifted, and unconscious animal will roll to the side.
8. Animals major blood vessels are severed using Chest Stick.
9. Animal is hoisted letting blood flow quickly.
10. Bled animal is lowered unto the skinning cradle and first incision is made down the middles to open the hide.
11. Hooves are cut off.
12. Animal hide is removed by cutting away from the muscle.
13. When the hide is removed, head is severed.
14. Lymph nodes in heads are checked to ensure no infection.
15. Tongue is dropped and cut off (specific for animals under thirty months or over thirty months).
16. Carcass is fully hung and cut is made from top to bottom (stomach or neck).
17. Paunch and guts will carefully fall out.
18. Edibles are inspected and kept.

19. Carcass is split down the middle using saw or reciprocating saw.
20. Spinal Cord is removed.
21. If over thirty months 1" on both sides of the vertebral column are removed & SRM is disposed properly.
22. Sides are rinsed with potable water.
23. The sides are moved into a drip cooler until sides reach 4°C.
24. The sides are split inside the drop cooler into quarters.
25. Quarters are then moved by winch from drip cooler into the aging cooler where meat is aged 14-21 days or as per customer request.
26. Secondary Processing (custom packed as per customer request).
27. Packed meat is delivered to the market or customer picks up order.

Proper training will be conducted by Federal and Provincial Government officials that will come onsite to train how to properly separate, collect, dispose and transport SRM, blood waste and other organic material from the slaughtering process. The estimated volume of operational waste will be a maximum 40 tons per year. The undertaking plans to operate year-round. The numbers used to determine operational waste is based on the estimated number of animals to be processed annually. This waste will be reduced through blood and other edible offal going for animal feed to another farm and depending on market availability, hides will be sold. More details pertaining to waste management can be found below in this next designated section of EPR, Waste Management Plan.

The operation will be a permanent facility and plans to operate year-round. Number of employees during the operational phase may vary at times. There will also be a combination of direct hires and contracted work during this phase. Kettle Hill Farms estimates 3-4 direct hires in the initial operational with potential to expand to 8-10 direct hires during peak operation. The number of hires through contract work will be unknown as this will depend solely on the contractor and the number of employees they require.

Direct hires:

Laborer's- NOC code. 7611

General Farm Workers- NOC code.8431

Industrial butchers/meat cutters/poultry preparers & related workers- NOC code 9462

Quality Control/ Supervisor, food & beverage processing- NOC code.9213

Contracted work:

Pest Controllers- NOC code. 7444

i) Waste Management Plan

This undertaking will be made available to livestock producers within the province servicing the immediate area first. There will also be an added service of trailering livestock for butchering. This undertaking will produce, red, white meat along with swine. Based on demand an estimated number of animals to be processed annually will be 2050. Broken down this will be approximately

250-300- Beef animals

1200-1500 Chicken/turkeys

250-300-Lambs/sheep/goats

Based on above numbers the estimated volume of operational waste will be maximum 40 tons per year. This undertaking will be a permanent facility and will operate year-round. Below is a breakdown of the operational waste and how it will be managed.

Table.1 Waste Management during operation

Type of Waste	Method of Management
<p>Specified Risk Material (SRMs)* (Skulls, brain, eyes, tonsils, spinal cord)</p>	<ul style="list-style-type: none"> - Under the guidance and permits of the Canadian Food Inspection Agency, SRMs will be transported to the provincial agriculture incinerator located at Brookfield Road in St. John's, NL.
<p>Non-Specified Risk Material (Non-SRMs)* (Blood, bone, trimmings, hides)</p> <p>-Other animal offal</p>	<ul style="list-style-type: none"> - Edible offal and blood will be transported to Viking Furs located in Cavendish, NL to be used as mink feed. - Unusable Offal will be transported to the provincial agriculture incinerator located at Brookfield Road in St. John's, NL.

	- Volume of animal hide can be reduced given market availability.
Black and grey waters	- Approved septic system on site.
Personal waste	- Weekly garbage removal by Eastern Waste Management.

*In the future, the proponent will consider on-site burial of both SRM and non-SRM wastes at a suitable site as determined by an environmental consultant and approved by the Department of Environment and Climate Change.

Blood and edible offal collected from processing will be transported to Viking Furs for mink feed. Agreeance letter from Viking Fur Inc, indicating same is attached. An approval had previously been given for the construction and installation of a sewage system/water supply to service the undertaking. However, this approval has since been revoked, pending EPR approval.

During operations offal such as blood, bone, animal trimmings effluent due to processing, solid waste materials such as Specified Risk Materials (SRMs) and non-Specified Risk Materials (non-SRMs) will be transported to another farm for animal feed or transported to the provincial agriculture incinerator. Proper training will be conducted by Federal and Provincial Government officials that will come onsite to train how to properly separate, collect, dispose and transport waste from the slaughtering processes. This training will be conducted prior to operation. SRMs will be collected and stored in designated containers which will be sealed, properly labelled and frozen until ready to transport to the incinerator. The equipment that handles SRM will be designated and not used for any other purpose within the operation. Conveyances used to transport SRM will be clearly identified and only used for that purpose. Kettle Hill Farms will need to record data such as dates, times and weights. Every time SRM is transported, SRMs are clearly identified and the vehicle transporting SRMs must have a "Spill Kit" aboard in the event there is a spill. Only trained personal will handle SRMs. A special permit from Canadian Food Inspection Agency (CFIA) will be issued to allow transport along with proper Standard Operating Procedures (SOPs) for handling and transportation of SRM. Permits will be obtained prior to initial transportation.

All activity regarding SRM control will be logged and kept on file for minimum 10 years. This process is highly regulated by Federal Inspectors with Canadian Food Inspection Agency auditing the documents quarterly.

Offal that is generated from this operation will be stored in containers of suitable metal, plastic or fiber glass leak-proof construction and covered with insect-proof covers of the same construction; marked to identify how it is being used and not used for any other purpose; kept clean and in good repair; kept in the storage room or isolated area provided for that purpose and emptied on a frequency that meets requirements. There will also be weekly garbage pickup for all other personal garbage etc. and a regulated pest control plan to eliminate any nuisance pest. Manure that will be generated from the livestock being housed will be stored as per regulation in a designated area, greater than 30m from any bodies of water and an appropriate distance from the artesian well.

ii) Noise Mitigation Plan

During the construction of the undertaking there will be minimal noise of equipment such as excavators and dump trucks. There will be a maximum of 2 excavators and 2 dump trucks working during the peak land development stage. This amount of equipment will suffice for land development that needs to take place. To the proponents advantage the land location and trees on the boundary of the land of the undertaking will absorb this noise. The nearest community and RV park are a far enough distance that this would have minimal to no impact on them. All land development activities will take place during regular work week hours. While the proponent does not foresee land development affecting the RV park approximately 421m away from the proposed site, land development will not occur during the weekend when the RV park maybe more populated.

Operational noises such as animals, processing activities within the abattoir and plant machinery would be very minimal. The location and design of the undertaking contributes to this significantly. Animals do not need to be transported before processing. They are held in a holding area that is joined to the abattoir or held in the already established barn next to the abattoir. Animals that are not stressed do not make noise. The proponent is confident that the flow from transporting vehicles to either the barn or holding area supports the animals in maintaining a stress-free environment. The walls of the abattoir are constructed of Insulated

Concrete forms (ICF). This form of material acts to reflect and absorb sound waves, making concrete an effective barrier for noise. We then have the already existing barn which is also constructed with concrete. This barn currently houses 50-75 sheep and 20 breeding cows separate from the undertaking operation and there has been no issue or complaints to date of noise from these animals. The location of the undertaking has a boundary of trees which also allows any noises to be absorbed.

iii) Odour Mitigation Plan

The operation of Kettle Hill Farms abattoir will not create an odour. All offal and SRM will be stored in accordance to the regulation within the provinces Meat Inspection Act. Offal and SRMs will be frozen and transported to the provincial agriculture incinerator. Very little odour is given off by fresh manure from animals being held in the holding pens. Once the manure starts to decompose, odour production begins. By keeping conditions dry, the production of odour is reduced. Good housekeeping of holding areas both attached to the abattoir and barn is the best management method.

iv) Vector Mitigation

Pest Control related activities will be contracted to a Pest Control Agency who will perform inspections according to their contract and record all activity and observations, recommendations, bait usage, and other pertinent information in a legible manner on report forms. Designated personal will meet regularly with the Pest Control Agency to discuss reports. The undertaking will ensure that all windows and doors are secure to allow no pest to enter. Doors leading to the outside are tight fitting and must be kept closed and all hiding places for pests are either eliminated or controlled. The interior of the facility will be constructed and maintained in such a manner as to prevent the entry or attraction of pests such as holes or cracks in walls, floors, ceilings being immediately repaired, and walls shall be kept clear of clutter.

The exterior of the undertaking will be constructed and maintained in such a manner as to prevent the entry or attraction of pests; such as roofs being immediately repaired,

perimeters maintained around the exterior of the buildings, standing water being eliminated, trash and food sources properly contained and quickly disposed of. Breeding grounds for pest such as tall grass and weeds around the facility would be eliminated. All conveyances used for the holding and transporting of offal will be kept in a clean and sanitary condition to avoid attraction of pest such as flies. All pens and holding locations will be maintained and manure that is produced by the animals before processing will be stored and spread as per regulations within the Environmental Protection Act.

v) Drinking/Recreational Water Impact Response Plan

Kettle Hill Farms Abattoir had an approval for the installation of a sewage system/water supply to service the commercial operation, however, this is currently revoked pending EPR approval. This proposed system has been designed to handle all wash down waters, black and grey waters that are generated from the abattoir. The proponent is confident that waters from the slaughtering and/or processing within the abattoir will be captured in this designed system. The proponent believes that it would be a rare event that there would be any off-site migration of contaminated waters. There are no drinking/recreational water supplies remotely near the abattoir that could possibly be affected. The artesian water source that will be used for washing down of the abattoir will be sent for microbiological analysis at a frequency that is acceptable to ensure potable water for proper cleaning of abattoir. In the event analysis of water from this water source is not acceptable, proper chlorination and measures will be implemented. Operation will be halted until water analysis proves to be acceptable. At that time, frequency of water sampling will increase to ensure confidence that the water source for Kettle Hill Farms abattoir is acceptable for use within its operations.

Kettle Hill Farm employees will be properly trained on clean up procedures in the event of offal spillage, particularly SRM. Proper tools and cleaning agents such as shovels, rakes, gloves and bleach will always be available on the site and in transportation vehicles used for the transportation of offal. All non-compliance activities such as, SRM spillage will be documented and corrective actions will be enforced. Information such as: what happened, cause of non-compliance, how it was corrected, signatures of personal who corrected the problem and personal who verified the corrective action will all be documented and kept on

record. All complaints will be taken seriously and investigations to determine root causes and the complaints validity will be initiated and documented.

vi) Groundwater Monitoring Plan

There will be no effluent of any type be released into the environment from the operation of Kettle Hill Farms Abattoir. The undertaking had an approval for the installation of a sewage system/water supply to service the commercial operation, however this approval is revoked pending approval of the EPR. This system has been designed to handle all wash down waters, black and grey waters that are generated from the abattoir. The proponent is confident that waters from the slaughtering and/or processing within the abattoir will be captured in this professionally designed system.

Possible leachate from manures of animals that will be housed before slaughtering will be contained and controlled. Proper farm management of manures will aid in this, proper storage and frequent spreading will decrease stockpiles and prevent leachate.

Offal and offal containing SRM will be stored in designated containers that will be leak proof and covered. Storage of offal and SRM will have no influence on the groundwater. If in the event there is a spill of offal, Kettle Hill Farm employees will be properly trained on clean up procedures. Proper tools and cleaning agents such as shovels, rakes, gloves and bleach will always be available on the site and in transportation vehicles used for the transportation of offal. All non-compliance activities such as, SRM spillage will be documented and corrective actions will be enforced. Information such as: what happened, cause of non-compliance, how it was corrected, signatures of personal who corrected the problem and personal who verified the corrective action will all be documented and kept on record. All complaints will be taken seriously and investigations to determine root causes and the complaints validity will be initiated and documented.

vii) Country Food Impact Response Plan

The undertaking will have no effect on country food. The location of Kettle Hill Farms Abattoir is on leased land by the proponent and is bounded by land leased by the

proponent and a transmission line. The proponent is confident that the operation of the abattoir will create no contamination to any possible country foods in the area. The undertaking has an approval pending for the installation of a sewage system/water supply to service the commercial operation. This system has been designed to handle all wash down waters, black and grey waters that are emitted from the abattoir. We are confident that all waters from the slaughtering and/or processing within the abattoir will be captured in this professionally designed system.

Hazardous material such as SRM will be frozen and stored until ready to transport to provincial agriculture incinerator. This will prevent any contamination to the environment. Transportation of SRM will also be conducted in a manner that is acceptable to prevent any contamination. SRM will be stored in designated containers that will be leak proof and covered. If in the event there is a spill of offal, Kettle Hill Farm employees will be properly trained on clean up procedures. Proper tools and cleaning agents such as shovels, rakes, gloves and bleach will always be available on the site and in transportation vehicles used for the transportation of offal. All non-compliance activities will be documented, and corrective actions will be enforced. Information such as: what happened, cause of non-compliance, how it was corrected, signatures of personal who corrected the problem and personal who verified the corrective action will all be documented and kept on record. All complaints will be taken seriously and investigations to determine root causes and the complaints validity will be initiated and documented.

viii) Spill Response Plan

To ensure quick and effective response to a spill event during both construction and operation phases will be implemented. All spills that may incur during the construction phase specifically from heavy equipment operation will follow the Standard Operation Procedures of the contractor but ultimately Kettle Hill Farms management will verify that all procedures have been followed.

During operation, the potential for any spill other than spillage of offal is minimal. There are no hazardous chemicals utilized in the operation only bleach to use during cleanup

and sanitation. Employees will be trained on how to properly mix bleach with water to the proper dilution for sanitation.

In the event of offal spillage, particularly spillage contained SRM there are proper procedures that must be followed during containment and transport. Containers containing offal and SRM will be covered and designed to contain fluids that will prevent access of scavengers and leakage into the environment. If leaks are observed during containment or transport the appropriate corrective action to stop the leak will be taken. Spill kits will be available on site and in transport vehicles. Spill kits will contain personal protective equipment (PPE) such as disposable coveralls, eye protection, gloves, absorbent material such as sawdust or absorbent clay, shovel, broom, disposal bags, duct tape and a list of emergency contact information in the event of a major spill. All spill kits will be stored in a container with a lid and contents will be checked regularly to ensure adequate supplies and expiration dates for kit components.

5. Alternatives

There were two locations which had potential to be suitable for the construction and operation of Kettle Hill Farms Abattoir.

The first location considered for the undertaking is located on agricultural leased land by the proponent, along Main Road, Route 80, Hopeall. This location has the attributes of an already established 140 ft x 30ft barn, a developed access road and access to both electricity and an artesian water source. This parcel of land has been agricultural land since the 1970's and is closer proximity to the main road allowing easier access to proposed facility.

The second or alternate Kettle Hill Farm location is also, agricultural leased land by the proponent, along Main Road, Route 80, New Harbour. This location has the attributes of a 50ft x 50ft barn and a developed access road. While it is a little further off the Main Road compared to the other location, it is still reasonable to access. It offers acreage; however, this is currently used for forage production to supply feed to the animals of Kettle Hill Farms. Although this location also has a barn, it is smaller and does not have the capacity nor design

to accommodate extra livestock for holding, which the other barn offers. This location lacks electricity and a water source, which would need to be constructed.

Upon consideration of both locations, the location deemed most appropriate is the agricultural land along Main Road, Route 80, Hopeall. Kettle Hill Farms Abattoir in Hopeall is a result of necessity and could not be more perfect. While both locations have a barn, the barn at this location is well established and has more capacity making it more suitable. Having an accommodating barn next to the abattoir is critical in the well-being of the animals. Animals that are awaiting further processing can be comfortably housed for a short period of time. Having the ability to not transport animals from an alternate location and having the ability to easily transport compromised animals to the abattoir is paramount when following the Humane Transportation of Animal Regulations. Less travel time for animals leads to less stressed animals, which is in line with the values of Kettle Hill Farms plan to make the well-being of animals a priority. Having access to electricity and an artesian water source are other attributes which were significant in the location choice. The alternate location on another Kettle Hill Farm in New Harbour, did not possess these important attributes for the construction and operation of an abattoir. Also, the acreage on this alternate location is used for forage production. Every acquired acre belonging to Kettle Hill Farms in this location is crucial in providing enough feed for the animals of Kettle Hill Farms. The space that would be needed to construct the abattoir would have utilized valuable space needed for forage production. The cost to run electricity would have been significant and there would need to have been a water source constructed making this choice less desirable and significantly less feasible. Please see attached aerial photo of alternate site.

6. Potential Environmental Effects and Mitigation.

Please refer within the EPR regarding the measures the undertaking will take to mitigate the potential effects of the construction and operation of Kettle Hill Farms Abattoir. Kettle Hill Farms is committed to running a safe and sound operation. The proponent is confident with proper permits, licenses and good farm management we will not only meet the minimum standards enforced by Provincial and Federal Legislations; we will exceed them.

The projected volumes of 40 tons of waste produced from the operation of the abattoir is a maximum volume. This waste will be reduced through blood and other edible offal going for animal feed and depending on the market availability, hides will be sold. All unusable offal and SRMs will be transported to provincial agriculture incinerator according to CFIA regulations.

The septic field has been designed to handle the commercial water supply of Kettle Hill Farms Abattoir, approval of same is pending EPR. Very minute amounts of blood will enter the septic field. Blood from animals is caught in a systematic way and then transported for animal feed. There is also catch basins installed that will catch larger particles from entering the septic.

There will be no impact from the operation of Kettle Hill Farms abattoir on the health of potentially sensitive human and environmental receptors. Kettle Hill Farms is committed to operating a safe and sound operation. The abattoir is bounded by agricultural land owned by the proponent and exceeds all distances from legitimate land owners/users. Please refer to the aerial photo that outlines distance of nearest bodies of water, residential areas and nearest business/recreational park of legitimate land/users from the abattoir.

7. Decommissioning and Rehabilitation

Assuming the eventual need to eliminate the entire undertaking, all infrastructure is to be removed. All rubble is to be removed frequently and disposed of in a licensed landfill site. The septic field will be pumped and disposed of properly. A soil contamination analysis is to be completed where units were demolished. Should the soil be contaminated, it must be removed and disposed of at registered landfill. The soil must be replaced and rehabilitated. The cleared site after decommissioning is to be graded and scarified to restore the ground to its original profile or as near as practicable, before topsoil and vegetation is replaced.

8. Public Information Meeting

March 28, 2021 notifications regarding the Public Meeting were placed in local stores and on social media. On April 5, 2021 a public information meeting was held in the community of Dildo, at the Community 5 Lions Club. Due to COVID-19 restrictions at the time of the session, formal gatherings ran by a recognized business or organization were limited to no more than 50 people and physical distancing must be maintained. Due to the limited amount of people that could attend because of restrictions, Kettle Hill Farms rented the building for the day and offered three 45-minute meetings. The first meeting was held for the residents of Hopeall as this is the location of the Abattoir, and the other two meetings were open to the general public. Please see attached the Notice of the public meeting that was posted in local stores and on social media to notify the public of the meeting. The Notice of Public Meeting was also hand delivered to Local Service District representatives of Hopeall, Greens Harbour and New Harbour. Also attached is the opening statement read at each meeting, by a member of Kettle Hill Farms, to the general public.

The first meeting, designated specifically for Hopeall residents, had 29 attendees. The meeting was approximately 47 minutes in duration. The second meeting, allotted for any member of the general public, had 31 attendees. The meeting extended into the start time for the third meeting offered. Staff let the second meeting continue and monitored entrance for attendees to start the third and final meeting. For the third meeting, 3 additional attendees arrived; they were invited into the previous ongoing session which was paused to welcome them. They were read the opening statement as per the other two meeting and attendees from the second meeting stayed, these joint sessions lasted approximately 120 minutes.

Attendees were encouraged to ask questions, raise concerns, but also given the time to express their words of support and encouragement. All three meetings were voice recorded and a member took hard minutes. All the attendees were made aware that all meetings would be voice recorded.

Kettle Hill Farms feel the meetings offered throughout the day were productive and informative for the attendees including Government officials, Local Service District members, residents of Hopeall and surrounding communities, business owners and even animal activist organizations. Kettle Hill Farms feel a significant amount of misleading and unguided information was circulating the community and created a negative image of how

the Kettle Hill Farms abattoir would operate. There were Facebook groups created, petitions, and Kettle Hill Farms were also notified of individuals who entered local stores and forcefully expressed their uneducated facts of how they think Kettle Hill Farms abattoir would operate. Notions were made that nearby ponds and Hopeall Falls would be polluted with blood and offal. Concerns businesses “could” potentially be impacted by the operation of the abattoir. The distances to all these areas of concern exceed the reasonable required offset and Kettle Hill Farms is confident, with the waste management plan and the strict guidelines and regulations to be followed, there will be no affect to these areas. Majority of questions that were asked were about the burial of offal. There were also questions concerning smell, flies and who will compensate businesses if they lose business because of the effects of the abattoir. The waste management plan allows for proper disposal of offal and SRMs, a professionally developed septic design allows for collection of waters from black and gray waters that with the proper procedures in place will contain no blood. Waste volumes are decreased by transporting edible offal to neighboring farms for feed. The attendees were notified these plans have strict guidelines that have no other choice to be in full compliance to operate a food grade facility.

Kettle Hill Farms abattoir has been compared to other farms in the surrounding area and to other farms in Alberta. It was explained that Kettle Hill Farms abattoir is a completely different operation that what it has been compared too. Kettle Hill Farms cannot be compared to a farm in another province which slaughters 50 000 head per week and contains feed lots. There was mis information concerning “the foul smell from the previous farm will be nothing like the smell from a slaughterhouse”. It was explained to the attendees; Kettle Hill Farms will be an operating Food Grade facility providing safe food for the public. The operation will follow strict guidelines and is highly regulated by both provincial and federal government officials.

Businesses were reassured there would be no reason the operation of Kettle Hill Farms abattoir would cause them to lose business. If there was a smell like some individuals indicated will come from this abattoir, Kettle Hill Farms would have a bigger issue on their hands and by law would not be permitted to operate. The attendees were notified that there are 24 Abattoirs across the island. Of those, 7 are located within the community (residential area) of Conception Bay South, there are houses nearby or adjacent to the abattoirs. There are many others that are located within residential areas. There has been no concerns or negative

impacts on surrounding areas due to their operations and many citizens are not even aware of their existence.

We feel that the information provided at the public meeting, mitigated many of the misperceptions and confirmed that the construction and operation of Kettle Hill Farms abattoir will have minimal to no effect on the people and the environments that surround the undertaking. After a proper explanation of Kettle Hill Farms plans, how they would operate (including detail of the waste management plan) and how highly regulated this operation is, feedback after the meeting proved that these questions were properly answered. Some individuals explained they had no idea what the operation entailed prior to the session and were initially left feeling reluctant of the operation due to the misleading and false information circulating by select citizens. Many individuals thanked Kettle Hill Farms for hosting the information session and for sharing the proper and most accurate information. Kettle Hill Farms had even received apologies for the spread of mis information by some individuals. Majority of the attendees wished Kettle Hill Farms best of luck and left the meeting with factual information and their questions answered. There were a select few minorities whom both entered and left the information sessions with their mind set and unsupportive of Kettle Hill Farms Abattoir. Even with proper explanation of the operations and the strict guidelines Kettle Hill Farms would be required to adhere to, these individuals did not want to see Kettle Hill Farms succeed in our area.

9. Approval of the Undertaking

Main Permits, licenses, approvals and other forms of authorization required for the undertaking.

Provincial:

Water Resources Management Division- Water use license

Fisheries, Forestry and Agriculture- A release and indemnification form, License to operate a Meat Plant,

Department of Environment Protection- approval for disposal of blood fluid waste, carcasses and offal material.

Health and Community Services- Water analysis certificate for potable water.

Digital Government and Service NL- approval for disposal of blood fluid waste, carcasses and offal material. Electrical Permit, Septic System approval, Building Accessibility Approval

Department of Environment, Climate Change and Municipalities- Waste Management Certificate of Approval.

Federal:

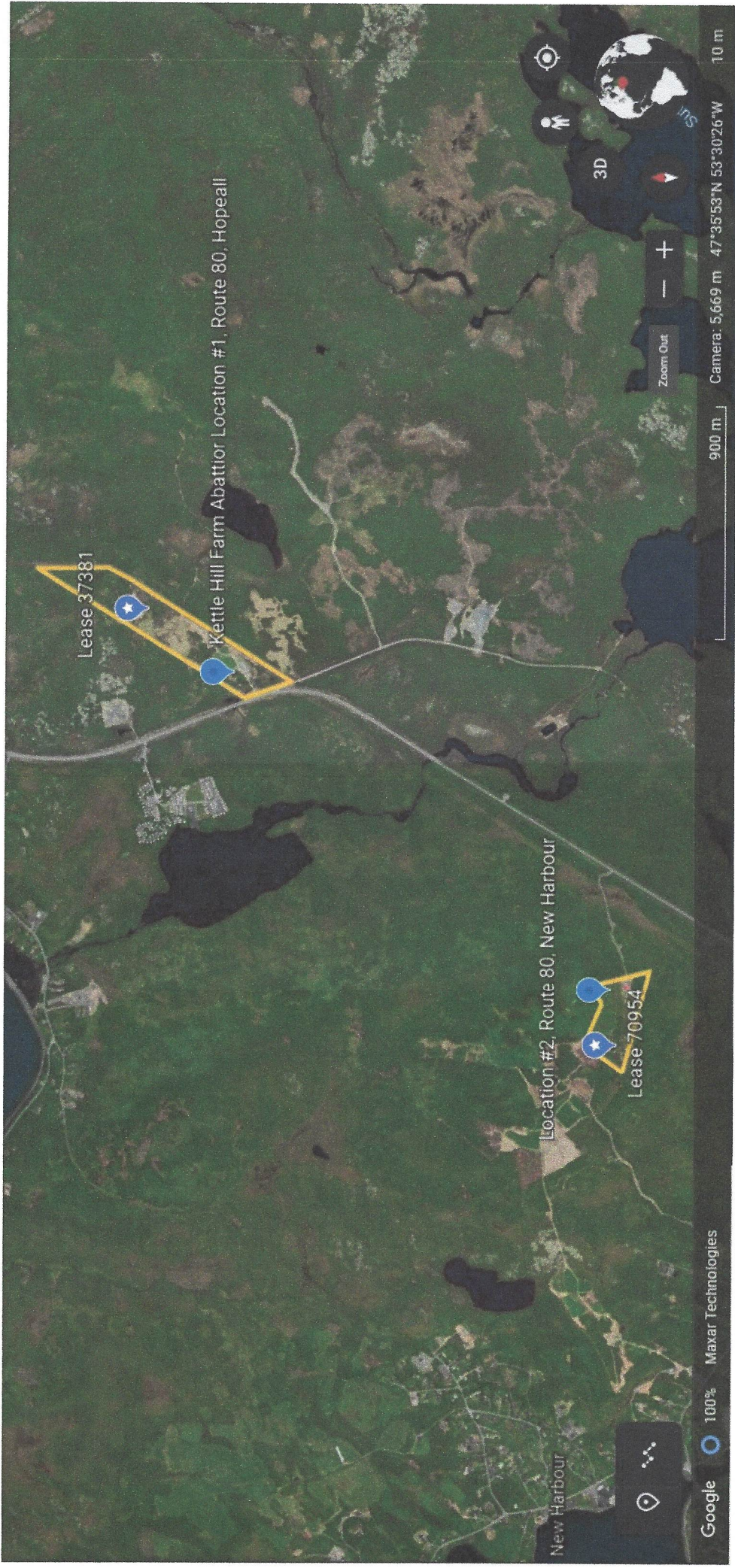
Canadian Food Inspection Agency – SRM disposal permit

10. Project Related Documents

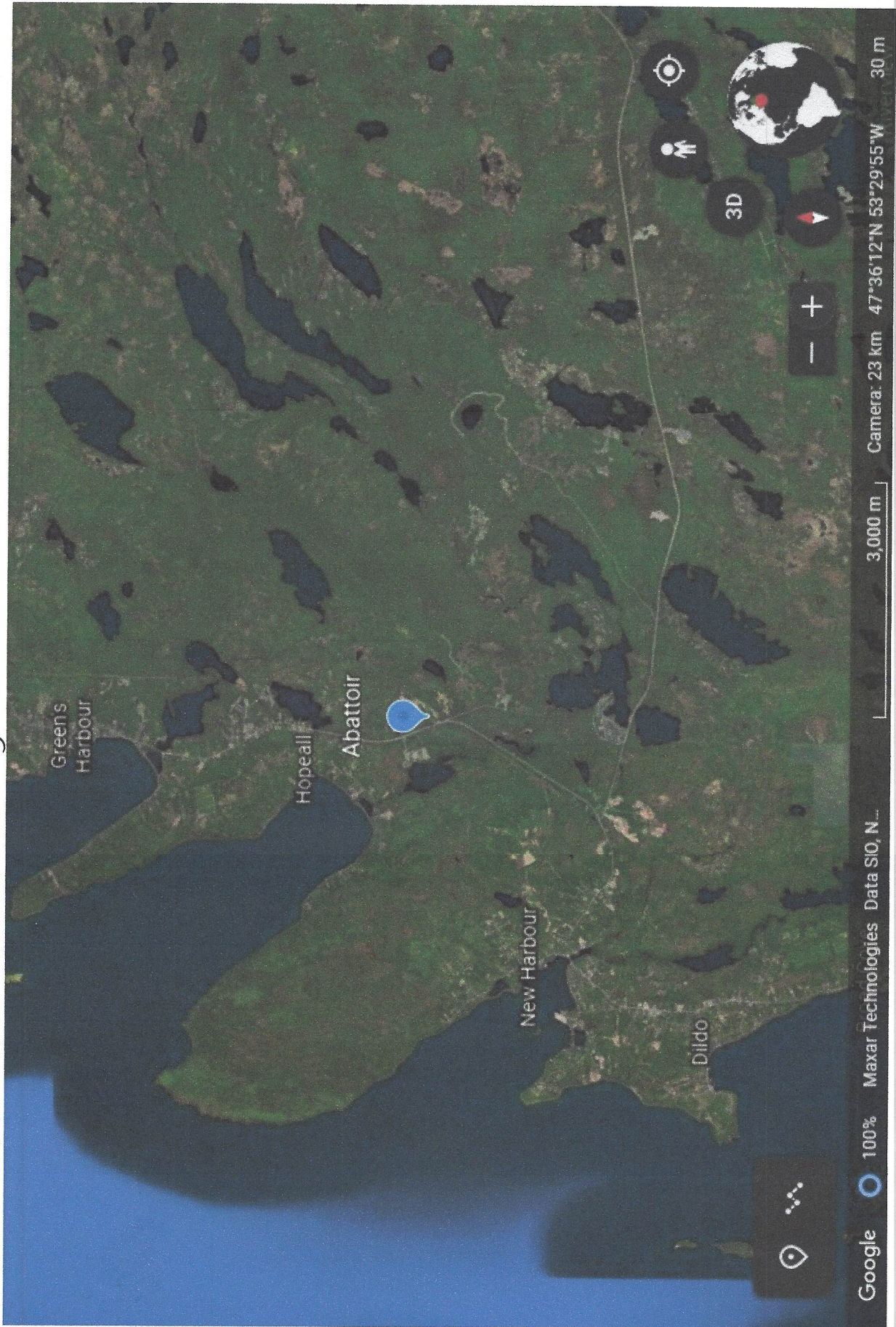
Slaughter House Guidelines as Approved by the Government of Newfoundland and Labrador
Meat Inspection Regulations, July 2020 Version

10. Project - Related Documents

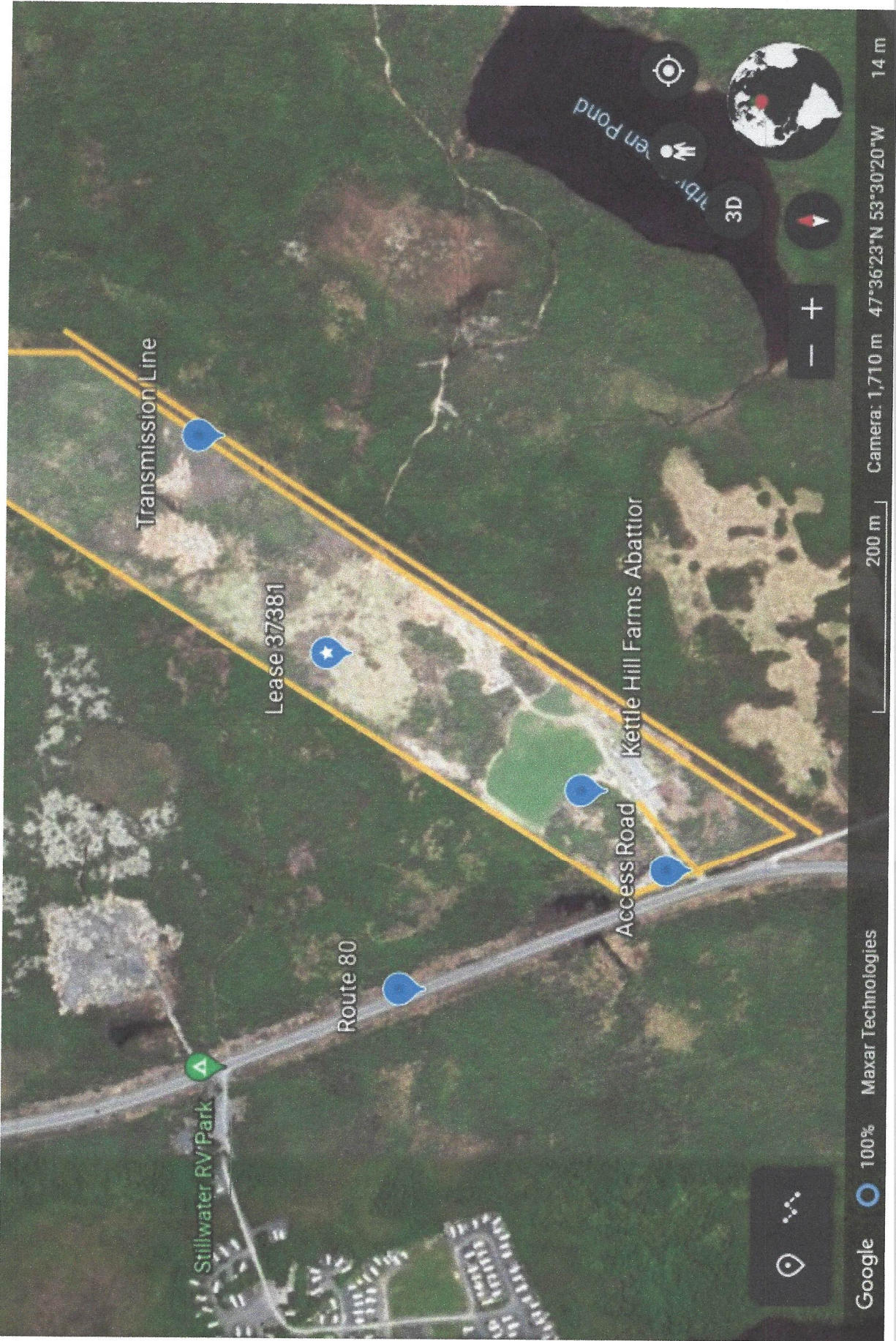
Aerial Photo of Alternative Locations:



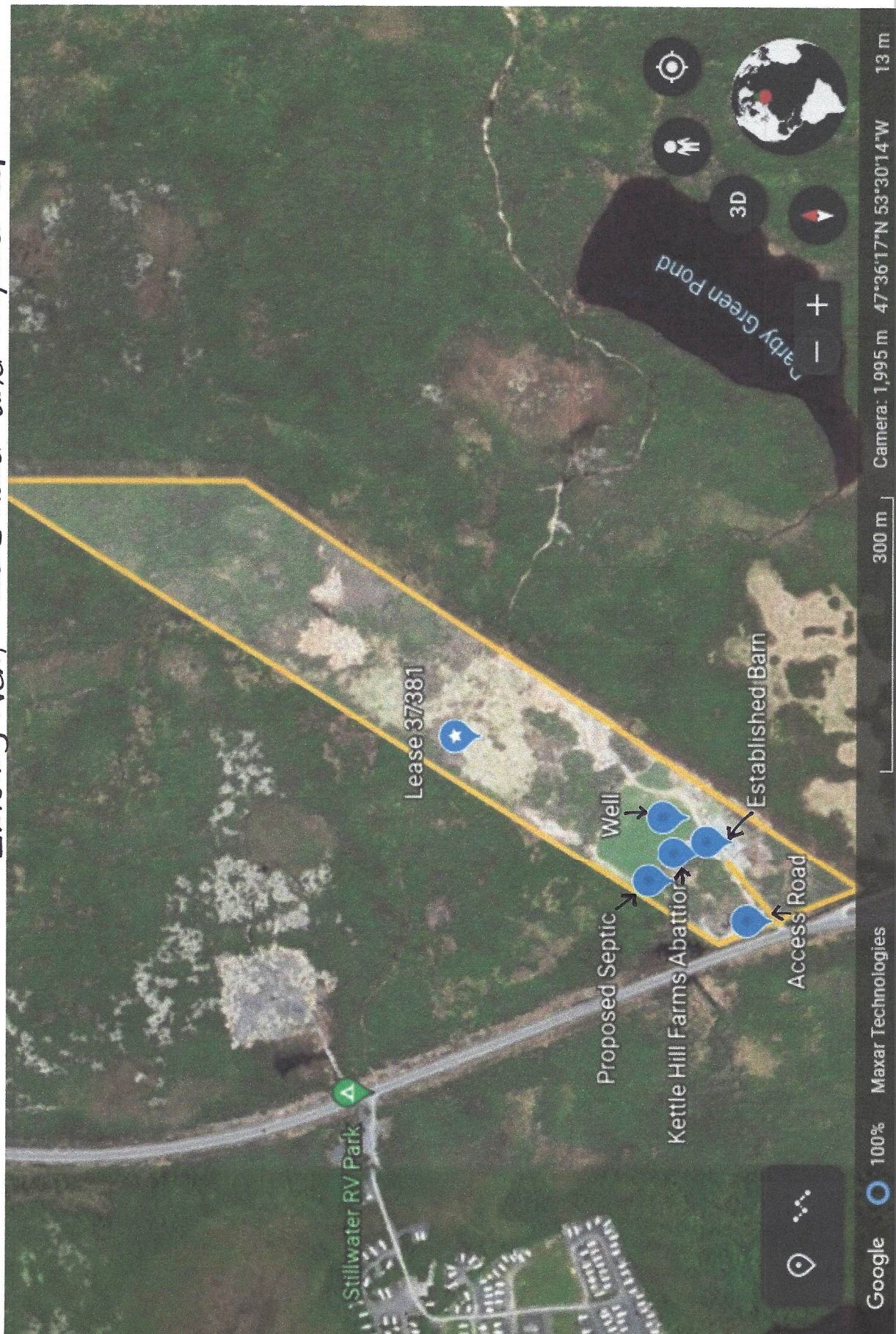
Aerial Photo showing Abattoir location



Aerial Photo of boundary, access road and transmission line:



Aerial Photo of Site Plan, showing Abattoir, Barn, Established Barn, Existing Well, Access Road and Proposed Septic

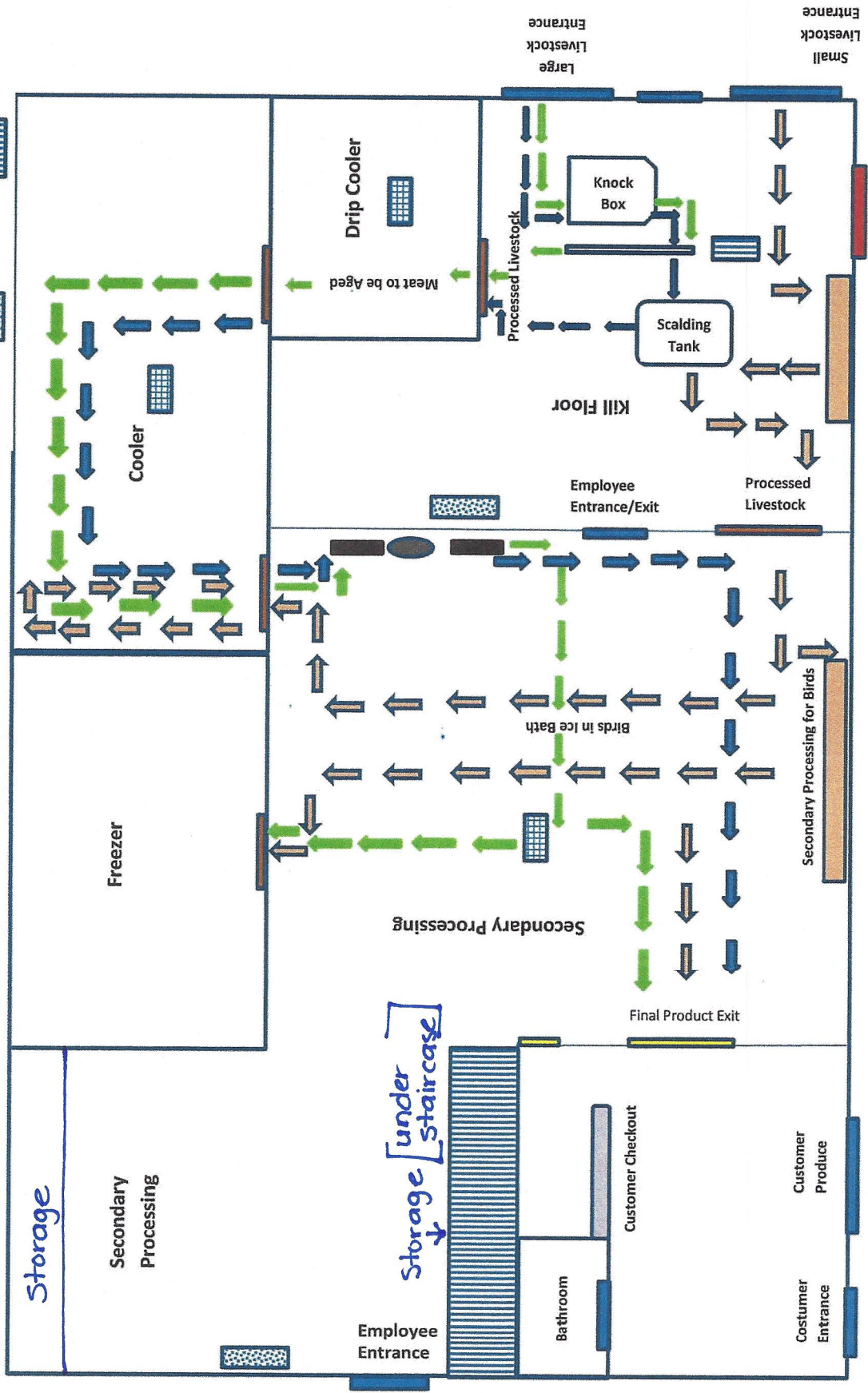
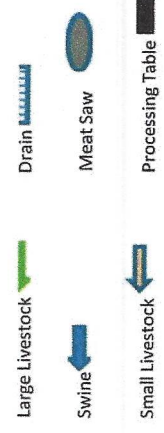


Aerial Photo showing distances of nearest residence, community, bodies of water and business / RV park



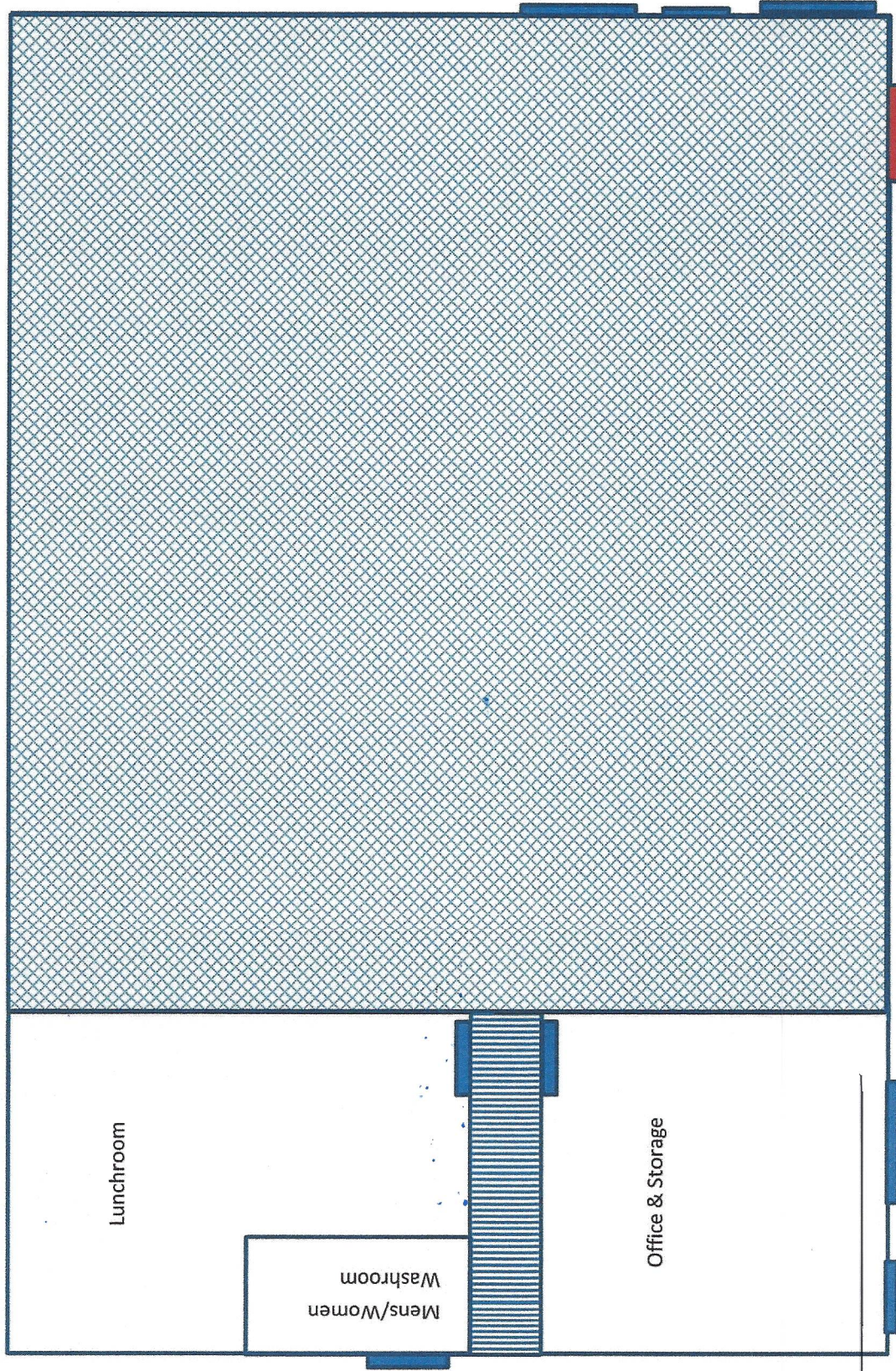
Kettle Hill Abattoir Level 1 Floor Plan

60'



Kettle Hill Abattoir Level 2 Floor Plan

18'



52'

Notice of a Public Meeting

Kettle Hill Farms Abattoir

DATE: April 5, 2021

Location: Dildo Lions Center

Kettle Hill Farms is inviting the public to an information session to educate and inform the public regarding the plan for a state of the art, provincially licensed Abattoir located in Hopeall, Trinity Bay. We will be holding 3 separate meetings to try and accommodate as many people as possible.

Items to be discussed:

- Background on the Undertaking
- The preferred choice of location
- The Waste Management Plan
- Open floor for questions

12:45 Doors will open for the citizens of Hopeall Meeting

1:00 Meeting will begin

2:15 Doors will open for the public

2:30 Meeting Starts

3:45 Doors will open for the public

4:00 Meeting starts

As per Covid Regulations there is maximum number of 50 people allowed to attend public gatherings and all safety measures such as wearing a mask and physical distancing will be maintained. Please keep in mind that the 50 people will include Kettle Hill Farm members, LSD of Hopeall, businesses of Hopeall and remainder will be the people at the door. Once we have reached capacity in the building the doors will be locked. There will be 3 separate meetings. The first meeting will be for the citizens of Hopeall, the other two meetings will be open to the public. It is recommended that if you cannot attend or because of the limited number of people we can have in the building, that you pass your questions or concerns along to your LSD representative to ensure it gets addressed. Listed above is the time slots of each meeting. The doors will open 15 mins prior to the meeting and will close when our max limit has been reached or the meeting is about to start. Only questions concerning the operations of Kettle Hill Farms Abattoir will be answered. Each meeting will be a 45-minute duration. Thank you for your time and I look forward to answering your questions.

Background of the Undertaking:

June 19th of 2020, the Newfoundland and Labrador Government announced a \$2.5 million support program to request proposals for the establishment of secondary beef processing facilities in the province.

Individuals, producers or associations were invited to submit proposals to explore the development of up to four abattoirs, with the possibility of one in each region: Labrador, Western Newfoundland, Central Newfoundland, and Eastern Newfoundland. This initiative aimed to address lack of access to proper slaughter and packing facilities in Newfoundland and Labrador.

Nelson being a 4th generation farmer that farms and transports sheep, swine and beef cattle, is fully aware and appreciates the need to have access to proper slaughtering and packaging facilities throughout the island. Kettle Hill Farms plan, supports the provincial livestock sector expansion program and sustainability of safe food within the province. With government investments and initiatives such as making beef cattle available to producers and the development of certified abattoirs in Newfoundland and Labrador collectively we can work towards self-sufficiency and local quality meat products which in turn will also contribute to the cutting of greenhouse emissions by reducing the amount of meat we import to the province.

Kettle Hill Farms is committed to operating a safe and sound operation that keeps the well being of its animals a priority during transporting, holding and the slaughtering processes. It is committed to producing safe, legal and authentic, quality products. We will continuously challenge ourselves to improve our standards, products to guarantee food safety and product quality. To achieve this, proper plans such as Standard Operating Procedures, Waste Management Plans, Personal Hygiene and Sanitation plans, and Food Safety Plans will be implemented and managed. Kettle Hill Farms will continue to be up to date with legislative requirements to ensure confidence and compliance in all processes throughout the operations.

The location of Kettle Hill Farms Abattoir in Hopeall is a result of necessity and could not be more perfect. It has an already established barn next to the abattoir which is critical in the well being of the animals. Animals that are awaiting further processing can be comfortably housed for a short period of time. The ability to not have to transport animals from an alternate location and the ability to easily transport compromised animals to the abattoir is paramount when following the Humane Transportation of Animal Regulations.

Less travel time for animals leads to less stressed animals, which is inline with the values of Kettle Hill Farms plan to make the well being of animals a priority.

Not only did this location have access to electricity and an artesian water source, this location has been agricultural land since the 70's. The alternate location for the abattoir did not posses these important attributes. The cost to run electricity would have been significant, there would need to have been a water source constructed and first and for most, this location would have been less desirable for transporting and flow of animals to the abattoir.

The public has voiced their concern about places such as Neighboring RV parks, the abandoned pony sanctuary, Hopeall Falls, businesses that "could" potentially be affected by the operation of the abattoir. The EPR which will be made public will outline the distances to all these areas of concern. The distance of the abattoir away from these areas of concern exceed the required reasonable offset and we are confident that this operation will have NO affect to these areas. Our Waste Management Plan allows for the proper disposal of offal, our approved septic design allows for the collection of waters from black and grey waters that with the proper procedures in place will contain NO Blood. We will be decreasing our volume to be buried by trucking edible offal to neighboring farms for feed. These plans have strict guidelines that have no other choice to be in full compliance to operate a food grade facility. Please note that a breach of regulation would significantly jeopardize Kettle Hill Farms reputation, and that is not an option.

While composting is the desired method of disposal of offal By the Department of Environment, the current plan for Kettle Hill Farms is to bury offal. In the original plan, it stated that offal would be buried onsite. This plan has since changed. Offal will now be buried in a non-contiguous site on another Kettle Hill farm located in New Harbour. This location will also be made available when the EPR goes public and can be viewed on an aerial photo. The non-contiguous burial site is limited to receive not over 350 kg (771.61lbs) of material per week or 18, 200kg (40,123.72lbs) of material per year. The burial site will be regulated by the Canadian Food Inspection Agency and monitored by Kettle Hill Farms. This site will be approved, a permit will be issued before any burial is allowed to take place. Guidelines such as proper fencing, signage, burial procedures and record keeping will be strictly followed. This site will be audited annually by the Canadian Food Inspection Regulations and all documents and records will be audited quarterly. This frequency will be increased given there is a complaint or a breach of regulation. Any volume that is an overflow of the regulation will be trucked to the nearest Waste management site.

There have been some comparisons made to other farms in this area and to other farms in Alberta. We cannot stress enough that the operation of this abattoir is a completely different operation than what we have been compared too. You cannot compare an apple to a banana. You cannot compare Kettle Hill Farms abattoir to a farm that houses animals and operations in a different province that slaughters 50 000 head per week and contains feed lots. There has been some mis information concerning and I quote, “the foul smell from the previous farm will be ne nothing like the foul smell from a slaughterhouse”. Kettle Hill farms will be operating a Food grade facility providing safe food for the public. Offal will be removed at a frequency that is acceptable, we have an approved septic system, the burial site will be an approved site following strict burial guidelines. If there is a smell like some individuals has indicated WILL come from this abattoir, then Kettle Hill Farms has a bigger issue on their hands and by law would not be permitted to operate.

We are fully aware of the Facebook groups, petitions, emails that have been circulating and individuals that have taken it upon themselves to push their way into local stores and forcefully express their uneducated facts of how they think Kettle Hill Farms abattoir will operate. We have been keeping silent through most of this simply because we will not comment or acknowledge comments or concerns that contain absolutely no merit. Notions such as blood and guts will be spilled all over the road, Hopeall Falls will be flowing red with blood, the retired ponies in the nearby pasture will need to listen to animals being slaughtered next door, offal will be piled high and left to rot and smell is out right ridiculous, tactless and will not be grounds for a response. These absurd scenarios that have been created is an obstruction of many regulations and I truly sympathize with the people that have allowed misleading information to dictate how they feel about how Kettle Hill Farms abattoir will operate. Kettle Hill Farms has more support then it does not, and we thank the public for trusting in our plans to provide a sound operation that will provide safe food for you and your families.

In closing I would like to thank you all again for taking the time to invest in your knowledge of the abattoir. We have worked very hard and diligently to ensure that we have not only reached the minimum requirements, but we will exceed expectations. We look forward to elaborating on topics and answering your questions.

VIKING FUR

Viking Fur Inc.
160 Main Rd., Cavendish, NL A0B 1J0

**Kettle Hill Farms
P.O. Box 281
Greens Harbour NL
A0B 1X0**

April 12, 2021

To Whom It May Concern:

Please accept this letter confirming that our company Viking Fur Inc. is willing to accommodate the offal suitable for mink feed from Kettle Hill Farms.

We wish you much luck in this venture.

Sincerely



**Peter Noer
Present, Viking Fur Inc.**