

GUIDELINES

for

Environmental Preview Report

for the

Tors Cove Seal Processing Plant

Registration 2156

Honourable Bernard Davis

Minister

Department of Environment and Climate Change

November 3, 2021

ENVIRONMENTAL PREVIEW REPORT GUIDELINES

The following guidelines are intended to assist the proponent, Ár n-oileán Resources Ltd., with the preparation of the Environmental Preview Report (EPR) for the proposed Tors Cove Seal Processing Plant. The EPR is a report that presents the results of an investigation based on readily available information that supplements the information already provided by the proponent upon registration of the undertaking. The purpose of the information in the EPR is to assist the Minister of Environment and Climate Change in making a determination as to the potential for significant environmental effects from the proposed undertaking and whether an Environmental Impact Statement (EIS) will be required. The EPR is expected to be as concise as possible while presenting the comprehensive information necessary to make an informed decision.

The EPR should include and update the information provided in the original registration document(s) and focus on the information gaps identified during the government and public review of the registration. The EPR should address the information gaps in sufficient detail to enable the Minister of Environment and Climate Change to make an informed decision as to the potential for significant environmental effect from the undertaking.

The contents of the EPR should be organized according to the following format:

1. NAME OF UNDERTAKING:

The undertaking has been assigned the name "Tors Cove Seal Processing Plant".

2. PROPONENT:

Name the proponent and the corporate body, if any, and state the mailing and e-mail address.

Name the chief executive officer if a corporate body, and telephone number, and e-mail address.

Name the principal contact person for purposes of environmental assessment and state the official title, telephone number, and e-mail address.

Please note: the EPR will be posted on the Department's web page and accessible to the public. Personal contact information such as telephone numbers and mailing addresses can be provided in a separate cover letter that will not be posted on the web page, if preferred.

3. THE UNDERTAKING:

State the nature of the project.

State the purpose/rationale/need for the project. If the proposal is in response to an established need, this should be clearly stated. Identify needs that are immediate as well as potential future needs.

4. DESCRIPTION OF THE UNDERTAKING:

Provide a description of the project in the following subsections, including complete information concerning the preferred choice of location, design, construction, operation and maintenance standards, etc.

4.1 Geographical Location/Physical Components/Existing Environment:

Provide an accurate description of the proposed site, access road, facilities and equipment, including GPS location coordinates. Attach an original base map (1:25,000 scale) and/or recent air photos/aerial imagery.

The description shall include, but not be limited to:

- a) Water supply intake pond (Tors Cove Pond) and infrastructure to transport water to the seal processing plant;
- b) Sewage/outfall infrastructure and discharge location to Tors Cove Harbour;
- c) Access roads to the facility, loading area and parking spaces;
- d) The nearby East Coast Trail and parking in the area for trail and other recreational users;
- e) Nearby residential properties, surrounding buildings, land uses, etc., and,
- f) Proximity to Witless Bay Ecological Reserve.

4.2 Construction:

State the time period in which proposed construction will proceed (if staged, list each stage and its approximate duration) and proposed date of first physical construction-related activity.

The details, materials, methods, schedule, and location of all planned construction activities must be presented, including:

- a) A description of the potable source of water and disinfection system that will service the facility. Provide a breakdown of approximate annual water use for each of the following categories:

- a. Kitchen and washroom;
 - b. Cleaning and washing of plant;
 - c. Water use for seal oil processing, if any;
 - d. Water use for fire hydrant; and
 - e. Any other use.
- b) A description of the storage, processing and waste disposal areas.
 - c) A description of the removal process of any hazardous substances during renovations, including asbestos abatement.
 - d) Employment information including type, and estimated number of positions during all phases of construction.
 - e) A commitment for the development of a Women's Employment Plan (WEP) to improve employment and training opportunities for women and other underrepresented groups. The WEP should identify specific commitments to support the requirement, training, employment and retention of women and diverse populations. The WEP should establish proactive policies, practices, and lines of accountability aimed at creating inclusive workplaces free from harassment and discrimination. The WEP must outline clear lines of communication to ensure adherence to the company's WEP for contractors, sub-contractors and unions.

4.3 Operation and Maintenance:

All aspects of the operation and maintenance of the proposed development should be presented in detail, including but not limited to the following:

- a) A complete flow through description of plant operations from receipt of seals from source, through to processing, storage and transportation, and marketing of final products;
- b) A description of the raw material receiving process including a description of the containers used to hold raw material (e.g. insulated tubs, watertight), a description of the area where raw material offloading will occur identifying pavement/gravel surfaces, slopes and drains that will reduce potential standing water, clearing/sanitizing procedures and frequencies for equipment and containers, and the location where containers are to be stored prior to processing;
- c) Separation, collection, disposal and transportation of waste materials (liquid and solid);
- d) Estimation of yearly waste volumes generated from facility at peak operation;
- e) List of chemicals (including quantities) that will be stored on site;
- f) The expected quality and proposed monitoring of effluents that will be released from the plant;
- g) Volume of traffic (including car, truck, heavy equipment/forklifts) for plant operations;

- h) External lighting requirements/design for plant facility and parking areas; and,
- i) Employment information including type and estimated number of positions during all levels of operation.

5. ALTERNATIVES

Alternative means of carrying out the project to meet the stated purpose and rationale must be provided. This section should demonstrate why the specific location and procedural methods were selected above others. The EPR must identify and describe alternative means and locations of carrying out the project that are technically and economically feasible. The following steps for addressing alternative means and locations are recommended:

- Identify any alternative means and locations to carry out the project;
- Identify the environmental effects of each alternative means and location;
- Identify the preferred means and location and provide rationale for selection; and
- Provide reasons for the rejection of alternative sites.

Include information from previous project related studies describing alternate locations that were considered, including the expansion of existing sites, reasons for rejection, and reasons supporting the proposed site as the preferred location, if applicable.

Alternative locations should be clearly outlined on maps of a suitable scale (i.e. 1:50,000, 1:25,000) and/or aerial imagery.

6. POTENTIAL ENVIRONMENTAL EFFECTS AND MITIGATION:

Provide detailed information regarding the potential effects of the project on the environment and the proposed mitigation to be used to avoid adverse environmental effects.

Identify how the project will avoid interference with the rights of other legitimate land owners/users, including East Coast Trail Users and associated parking areas.

This section must describe the potential effects on and mitigations for the following, including but not limited to:

- a) Tors Cove Pond water supply;

- b) Tors Cove Harbour recreational use;
- c) Air quality in the Community of Tors Cove;
- d) Tourism appeal to the Community of Tors Cove and the section of East Coast Trail that runs through the area;
- f) Health of potentially sensitive human and environmental receptors immediately adjacent to and near the project boundary;
- g) Traffic and parking in the Community of Tors Cove;
- h) Migratory birds including the Witless Bay Islands Ecological Reserve; and,
- i) Potential accidents and malfunctions.

The following information/plans shall be included in the body of the EPR or as Appendices:

- i. Waste Management Plan: the plan must describe how the maximum volume of waste that may be generated by the operation will be managed, including a description of agreements in principle with businesses that have the capacity to handle the waste that may be generated at peak operation.
- ii. Noise Mitigation Plan: the plan must describe measures that will be undertaken to mitigate noise (e.g. construction, operation of machinery, and increased traffic), including pre-established mechanisms and procedures to address concerns about noise.
- iii. Air Quality/Odour Mitigation Plan: the plan must describe measures that will be undertaken to mitigate odours, including pre-established mechanisms and procedures to address odours resulting from the operation.
- iv. Vector Mitigation Plan: the plan must include pest and fly control measures as well as exclusion of gulls from food sources.
- v. Recreational Water Quality and Country Foods: the plan must include mitigation measures to address impacts to recreational water quality and recreational fisheries.
- vi. Wildlife Management Plan: the plan should include appropriate and site-specific preventive measures to reduce/minimize the impacts of the project on migratory birds and other wildlife, including:
 - a. The mitigation measures that will be implemented to reduce/minimize the risk of attraction of migratory birds and other wildlife to the project area.

- b. Proposed methods to exclude/deter migratory birds and other wildlife from the project area.
- c. A monitoring plan that includes protocols to search for and release birds that potentially become stranded onsite.

7. DECOMMISSIONING and REHABILITATION:

Describe all aspects of the decommissioning and rehabilitation plans for the project, assuming the eventual need to eliminate the entire project footprint from the landscape.

8. PROJECT- RELATED DOCUMENTS:

Provide a bibliography of all project-related documents already generated by or for the proponent (e.g., feasibility study, engineering reports, etc).

9. PUBLIC INFORMATION MEETING:

A public information session shall be held in the geographical area of the undertaking, or as the minister may determine, in order to:

- a) provide information concerning the undertaking to the people whose environment may be affected by the undertaking;
- b) record and respond to the concerns of the local community regarding the environmental effects of the undertaking; and,
- c) present the information gathered to fulfill the requirements of Section 5 of these guidelines.

The public information session must adhere to all restrictions to mitigate the impacts of COVID-19 that are in place at the time of the session. Information sessions may be conducted by virtual means through a live streaming, video conferencing or teleconferencing process, such as Microsoft Teams, Skype, etc.

You are required to notify the Minister and the public of the scheduled meeting **not fewer than 7 days** before that meeting. Public concerns shall be recorded, described and addressed in a separate section of the EPR.

Protocol for these public sessions will comply with Section 10 of the Environmental Assessment Regulations, 2003. Public notification specifications are outlined in Appendix A.

10. APPROVAL OF THE UNDERTAKING:

- a) List the main permits, licences, approvals, and other forms of authorization required for the undertaking, together with the names of the authorities responsible for issuing them (e.g., federal government department, provincial government department, municipal council, etc.).

One paper copy of the EPR and an electronic version for posting to the Environmental Assessment website, should be sent together with a covering letter to:

Minister
Environment and Climate Change
P.O. Box 8700
St. John's NL A1B 4J6

APPENDIX A

Public Notices

Under the provisions of the Environmental Assessment Regulations 2003, Section 10, and where the approved Guidelines require a public information session, the following specified public notification requirements must be met by the proponent prior to each meeting:

PUBLIC NOTICE

Public Information Session on the Proposed

Name of undertaking
Location of undertaking

shall be held at
Date and Time
Location

This session shall be conducted by the Proponent,
Proponent name and contact phone number or email address,
as part of the environmental assessment for this Project.

The purpose of this session is to describe all aspects of the proposed Project,
to describe the activities associated with it, and to provide an opportunity for all
interested
persons to request information or state their concerns.

ALL ARE WELCOME

MINIMUM INFORMATION CONTENT OF PUBLIC ADVERTISEMENT

- Minimum newspaper ad size: 2 column widths. Minimum posted ad size: 7" x 5"
- Minimum newspaper ad coverage: Weekend preceding meeting and 3 consecutive days prior to meeting date; to be run in newspaper locally distributed in meeting area or with closest local distribution area.
- Minimum posted ad coverage: Local Town or City Hall or Office/website, local Post Office within town or community where meeting is held, and local community channel (if applicable) to be posted continually for 1 full week prior to meeting date.
- Proponent's web page, social media sites (optional).