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CHEEBA BROTHERS - ENVIRONMENTAL REGISTRATION DOCUMENT

Civic No. 220 Discovery Trail, Trinity Bay North, NL

Trinity Bay Development Corp.

June 22, 2021

Pollution Prevention
Department of Environment,
Climate Change and Municipalities
4th Floor, West Block
Confederation Building
P.O. Box 8700
St. John's, NL
A1B 4J6

June 22, 2021

Re: Trinity Bay Development Corp./Cheeba Brothers Cannabis Production Facility

The following document outlines our plan associated with renovating and retrofitting existing infrastructure located at Civic No. 220 Discovery Trail, in the Town of Trinity Bay North, Newfoundland and Labrador, to facilitate the development of a cannabis production facility.

The proposed development of our facility and operation practices are incorporated from first-hand knowledge and through consultation with industry leaders in private and public departments (federal and provincial). We are experienced in the applicable regulations associated with this industry and are well prepared to abide by the regulations during the development and production/distribution activities proposed for this facility.

Upon completion of the development activities and following approval from Health Canada we will have a secure facility fully compliant with all applicable regulations. Based on the location of the facility, our proposed practices, and the extensive regulations there are no immediate environmental concerns associated with our development or operation activities.

We have the support of the municipality associated with the Town of Trinity Bay North, and they have categorized us as "Light Industrial". It should be noted that the site was a former fish plant that operated for many years, most recently as a shrimp processing facility. We feel that this demonstrates that the location of our proposed facility is in an appropriate zone.

We look forward to your reply.

If further information is required, I can be reached at 1.250.897.5130.

Darcy McKenna



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1.0 Name of Undertaking

Cheeba Brothers Cannabis Production Facility

2.0 Proponent

2.0.1 Name of Corporate Body

Trinity Bay Development Corp.

2.0.2 Address

220 Discovery Trail
Trinity Bay North, NL
A0C 2J0

2.1 Chief Financial Officer

2.1.1 Name

Darcy McKenna

2.1.2 Address

P.O. Box 31
Trinity Bay North, NL
A0C 2J0

2.1.3 Contact Information

Telephone: 1.250.897.5130

2.2 Principal Contact Person

2.2.1 Name

Darcy McKenna

2.3 Secondary Contact Person

2.3.1 Name

Randy Stead

2.3.2 Address

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Bonavista, NL
A0C 1B0


2.3.3 Contact Information

Telephone: 1.709.468.6056

3.0 The Undertaking

3.1 Purpose

The purpose of this undertaking is to develop a licensed cannabis production facility on the Bonavista Peninsula to facilitate the distribution of cannabis products to registered clients, as well as licensed producers and sellers. Our application has been submitted to Health Canada and we are in the process of obtaining ownership of the former Ocean Choice International fish plant, located in the Town of Trinity Bay North. The fish plant's infrastructure consists of a large



multi-room building and multiple standalone buildings which would provide more than enough space to satisfy our development plans. The development and operation associated with our cannabis production facility will provide a significant economic boost to the Town of Trinity Bay North and surrounding areas. The area's economy has decreased significantly since the fish plant closed in 2010.

3.2 Site Description

3.2.1 Geographical

The subject property is identified as Civic No. 220 Discovery Trail located in the Town of Trinity Bay North, Newfoundland and Labrador (48°30'14.93"N and 53° 4'56.80"W). The property consists of approximately 2.49 hectares (6.16 acres) of commercial/light-industrial zoned land. The property is bound by vacant, undeveloped land, Main Street and an automotive mechanics garage (Chards Automotive) to the east-northeast, Discovery Trail, followed by Diamond Pond, a commercial parking area, and residential properties to the north, residential properties to the west, and the Catalina Harbour to the south. Google Earth images showing the site location and surrounding communities are provided in Appendix A. A site survey for the subject property is provided in Appendix B.

3.2.2 Physical


Our facility will be located on the eastern side of the Bonavista Peninsula, approximately 20 kilometers (km) from the Town of Bonavista, 90 kms from the Town of Clarenville, and approximately 280 kms from the City of St. John's. The site was initially developed as a fish plant consisting of one large multi-room building and multiple stand-alone buildings. However due to complications caused by a severe storm, the facility closed in 2010. The majority of the buildings are supported with concrete and metal. Currently, the subject property is enclosed with a metal security fence. The site is connected to Newfoundland Power electrical services, as well as water and sewer services associated with the Town of Trinity Bay North.

The development plan for the cannabis production facility will consist of renovation and retrofitting activities conducted in stages throughout the facility starting with a former maintenance building. All development plans will be completed following the Access to Cannabis for Medical Purposes Regulations (ACMPR).

3.3 Site Development

All development proposed for the property will be funded by Trinity Bay Development Corp. Skilled trades people, consultants, engineers, etc. local to the area will be contracted to complete all development activities, if possible.

Proposed renovation activities will begin in the former maintenance building and will include, but won't be limited to, upgrading the building's exterior finishes, the construction of production areas (grow rooms, drying rooms, cloning rooms, etc.), a shipping and receiving area, a retail space, secured and unsecured storage areas, utility rooms, washrooms, a security personnel office, administration offices, etc. Materials used during renovation activities will include, but will not be limited to, light-emitting diode (LED) and high-pressure sodium (HPS) lighting, high grade heating, ventilation and air conditioning systems (HVAC), full scale hydroponics systems, miscellaneous building materials (drywall, commercial flooring, bathroom fixtures, etc.), as well as security devices (cameras, sensors, access/egress), under the direction of the ACMPR.



Following the approval of the Environmental Registration document, the approximate timeline for the renovation activities associated with the former maintenance building will be 1 year.

Upon completion of the renovation activities associated with the former maintenance building and following the commencement of production activities, large scale renovation activities will begin in the remaining buildings located throughout the subject property. The approximate timeline for the proposed renovation activities associated with the remaining buildings is 3-4 years.

The exterior area of the subject property is in relatively good condition, however grading and new asphalt will be considered following the development of the former maintenance building.

3.3.1 Environmental Concerns and Mitigation Measures

Potential concerns and mitigation measures associated with renovation activities proposed for the subject property are as follows:

3.3.1.1 COVID-19

All contractors and workers at the site will be required to complete an onsite screening questionnaire each morning, keep a physical distance of 2 meters between themselves and other individuals, wear a facemask at all times while onsite, and practice good personal hygiene. Hand sanitizer and masks will be readily available at the site.

3.3.1.2 Climate Change

In September 2010, a severe weather event, identified as Hurricane Igor, swept across the island portion of the province of Newfoundland and Labrador. The wind and rain associated with Hurricane Igor caused significant damage to the exterior area of the fish plant's property, including building finishes. The damage caused to the exterior area of the property was the result of heavy rainfall breaching a dam associated with the Whirl Pond reservoir located north of the property. The damage caused to the building's exterior finishes were the result of strong winds and dated infrastructure.

Following the damage caused by Hurricane Igor, mitigation measures were implemented at the Whirl Pond reservoir which included the construction of retaining walls and berms. Also, the exterior area of the subject property had been graded and re-sloped to allow rainfall runoff to flow across the site toward the waterfront. Furthermore, all renovations currently proposed for the site buildings will include utilizing materials and incorporating installation practices that will mitigate the potential for damage caused by severe weather events in the future.

3.3.1.3 Dust

Minor dust particles could potentially be created during renovation activities associated with disturbing building materials. The majority of these activities will be conducted throughout the interior area of the buildings and are not considered an immediate concern to the surrounding areas. Good house-keeping practices will be implemented to help mitigate the potential influence to surrounding areas.

3.3.1.4 Liquid Waste

Liquid waste is not a potential environmental concern at the site. The facility is equipped with washrooms and running water which will be accessible by all workers at the site.

3.3.1.5 Noise

The majority of the noise associated with renovation activities conducted at the subject property will be created by power tools. Heavy machinery, if used, would only be required on a short-term, as-needed basis. Furthermore, all activities will be conducted during regular working hours between 8:00 am and 6:00 pm Monday to Friday, following bylaws stipulated by the Town of Trinity Bay North.

3.3.1.6 Petroleum Hydrocarbons

Heavy machinery could be utilized at the site on a short-term, as-needed basis, as such there is a potential for minor petroleum hydrocarbon staining and/or spills to occur. Contractors and operators will be made aware of the concern relating to petroleum hydrocarbon spills at the site and will be required to ensure equipment is in good working order prior to accessing the site. A spill kit will be available on-site and all workers will be aware of its location. Furthermore, bulk fuel storage will not be implemented at the subject property.

3.3.1.7 Solid Waste

The remains of building materials (wood, concrete, metal, Styrofoam, fiberglass insulation, etc.), associated distribution wrapping (cardboard, plastic, etc.), and workers food waste will be the main sources of solid waste at the site. Good house-keeping practices will be implemented throughout the renovation activities to mitigate the potential influence to surrounding areas. Waste disposal containers located on the exterior area of the property will have appropriate covers to prevent wildlife and wind from carrying waste debris to surrounding properties.

3.3.1.8 Potential Resource Conflicts

There are no potential resource conflicts currently identified for the development of the facility.

3.4 Operation and Production

Following the development of our subject property and obtaining Health Canada's approval, we will begin growing our first crop of cannabis. Seeds will be obtained from an approved Health Canada facility. The seed will germinate and grow to maturation in the buildings designated grow rooms. Our LED and HPS lighting systems will provide an ideal growing environment which is essential for the quality of the product, and our HVAC systems will provide optimum growing temperatures (21 to 24 degrees Celsius) and humidity levels (50%-60%). The hydroponic system will consist of synthetic rock-type growing medium and nutrient enriched water, which will be captured and recirculated through hoses, polyvinyl chloride (PVC) piping, and water pumps.

Samples of the first growth of plants will be submitted to Health Canada for testing. If the product passes Health Canada's requirements we will be provided with our production and distribution license.

A summary of the production process is as follows:

1. Cuttings collected from a mother plant and placed in the clone room to vegetate;
2. Matured clones are transferred to growth room to begin flowering stage;
3. Harvesting is conducted when matured plants have flowered;
4. The flower is trimmed and air dried; and
5. The dried flower is weighed and packaged under the direction of the ACMPR.



3.4.1 Environmental Concerns and Mitigation Measures

Potential environmental concerns relating to operation and production activities associated with the facility are as follows:

3.4.1.1 Air Emissions

Air associated with the production of cannabis typically contains pollen and significant odors. Air circulation during the cannabis production process is necessary to obtain optimal growing conditions, as well as ensure a healthy atmosphere for workers.

In order to alleviate air emission concerns, HVAC systems associated with the buildings will be equipped with industrial air scrubbers and carbon or HEPA filters. Mist cannons will be installed and in operation regularly. Furthermore, the system will be installed and maintained regularly following the ACMPR, by a licensed HVAC specialist. Upon the commencement of operational activities, emissions/air quality will be monitored regularly to ensure compliance with the ACMPR and provincial regulations. Prior to obtaining a license to begin production, an inspection of the system will be completed by Health Canada.

3.4.1.2 Chemical Storage

All chemicals will be properly labelled and safely stored in designated areas away from cannabis storage areas. Furthermore, all products will be food safe. Pesticides will not be used during our operation unless a specific problem occurs. At that time, a Health Canada approved pesticide would be obtained. A list of approved pesticides is provided in Appendix D.

3.4.1.3 COVID-19

All onsite workers and visitors will be required to follow company protocols at all times with respect to COVID-19. Onsite screening will be completed daily, masks will be worn, and social distancing will be practiced at all times.

3.4.1.4 Liquid Waste

Circulated nutrients will be the main waste associated with the production of cannabis at our facility. However, our process will include the recirculation of nutrient water which will minimize the quantity of liquid waste. An effort will be made to reuse all identified waste, if possible. Waste that cannot be reused will be collected and disposed of following the ACMPR and the Environmental Control Water and Sewage Regulations 2003.

3.4.1.5 Noise

Noise is not expected to be a concern with respect to the production of cannabis. Our operation activities will occur between 8:00 am and 4:00 pm and will abide by the Town of Trinity Bay North's municipal bylaws.

3.4.1.6 Petroleum Hydrocarbons

Petroleum hydrocarbons will not be stored at the site however, a designated spill kit will be readily available for emergency purposes.

3.4.1.7 Solid Waste

Solid waste in the form of worker food waste, plastic, Styrofoam, etc. will be collected in designated waste containers and transported to a landfill regularly. All recyclable materials will be stored and transported to an approved facility, where possible.

Cannabis related waste left over from harvesting will be destroyed as per Health Canada's direction.

3.4.1.8 Potential Resource Conflicts

There are no potential resource conflicts identified for the production and operation of the facility.

Table 1: Potential Environmental Impacts and Mitigation Measures

Item	Potential Impact	Mitigation Measure
Air Emissions	Pollen and odors	<ul style="list-style-type: none"> ➤ Industrial air scrubbers. ➤ Carbon/HEPA filters. ➤ Mist Cannons. ➤ Regular maintenance.
Chemical Storage	OH/S and contamination concerns relating to spills	<ul style="list-style-type: none"> ➤ Products labelled. ➤ MSDS provided. ➤ Employee training. ➤ Only HC approved pesticides onsite, if required. ➤ Standard operating procedures (safe handling, spill response, personal protective equipment). ➤ Designated storage rooms away from production areas. ➤ Eye wash and spill kit locations adequately identified.
COVID-19	OH/S concern relating to the health of workers and their families	<ul style="list-style-type: none"> ➤ Daily onsite screening. ➤ Physical distancing of ≥2m. ➤ Masks worn at all times. ➤ Training and postage signage.
Liquid Waste	Impacting environment and surrounding areas	<ul style="list-style-type: none"> ➤ Nutrient liquid captured and recirculated. ➤ If residual waste encountered, disposal practices will follow the ACMPR and applicable provincial regulations.
Noise	Disturbing nearby residential occupants	<ul style="list-style-type: none"> ➤ Work activities conducted between 8:00am and 4:00pm Monday to Friday ➤ Work activities will abide by municipal bylaws
Petroleum Hydrocarbons	Contamination to the exterior area of the property caused by spills	<ul style="list-style-type: none"> ➤ Spill kits provided onsite and location identified to staff and contractors. ➤ Instruct staff and contractors on concern relating to spills.
Solid Waste	OH/S concern relating to poor housekeeping practices and waste materials polluting the property and neighboring properties.	<ul style="list-style-type: none"> ➤ Instruct staff and contractors to practice good housekeeping. ➤ Waste collection bins to be fitted with adequate covers. ➤ Dispose of waste regularly.

3.5 Operational Staff

Upon commencement of operational activities we expect to have between 70 and 100 people employed, the majority of which will be retained on a full time-permanent basis for the following positions; administrative personnel, production managers, laborers, quality assurance manager

and assistant, sales and marketing team, security personnel, etc. Employment equity guidelines and labor standards will be followed during the recruitment process which will provide equal opportunities to all individuals. Priority will go towards hiring locals that were displaced by the closure of the fish plant. Local education facilities, as well as the Department of Advanced Skills and Labour will be solicited to identify suitable graduates and skilled individuals for potential employment.

Table 2: Operational Staff Breakdown

Occupation	NOC Code	Full/Part Time	Length of Employment	# of Personnel	Contract/Direct Hire
Business Manager	0125	Full Time	Full Time	1	Direct
QA Manager/Assistant	0212	Full Time	Full Time	2	Direct
Head of Security	6541	Full Time	Full Time	1	Direct
Security Guard	6541	Full Time	Full Time	2	Direct
Production Manager	0911	Full Time	Full Time	1	Direct
Master Grower	0822	Full Time	Full Time	2	Direct
Trimmers/Harvesters	8432	Full Time	Full Time	34	Direct
Shipping/Receiving	1521	Full Time	Full Time	4	Direct
General Laborer	9619	Full Time	Full Time	20	Direct
Salesclerk	6421	Full Time	Full Time	2	Direct
Marketing Manager	0124	Full Time	Full Time	1	Direct

3.6 Project Related Documents

- Application to Become a Licensed Producer under the Access to Cannabis for Medical Purposes Regulations (ACMPR).

4.0 Approval of the Undertaking

Health Canada’s application process under the ACMPR involved a security clearance from the RCMP and Health Canada. When the security clearance is complete, and the inspections are passed we will be granted a production license from Health Canada. We would be required to submit our first batch of product to Health Canada for testing and approvals. When our product has satisfied regulations, Health Canada will issue a distribution license.

Within this process, we also had to submit written notice of our intent to the local detachment of the RCMP and our Local Fire Department.

The following is a list of permits, licenses, approvals, and authorizations that may be required to enable the undertaking:

Table 3: Summary of Required Approvals

Authorization	Legislation	Responsible Department
Project Registration	NL Environmental Protection Act – Environmental Assessment Legislation	NL Department of Environment, Climate Change and Municipalities
Security Clearance	Access to Cannabis for Medical Purposes (ACMPR)	Health Canada RCMP
License to Produce	Access to Cannabis for Medical Purposes (ACMPR)	Health Canada

License to Sell	Access to Cannabis for Medical Purposes (ACMPR)	Health Canada
Various Permits	Town of Trinity Bay North Permit Application	Town of Trinity Bay North

5.0 Schedule

Upon receiving approval from Health Canada and ECCM, renovation activities will begin in the former maintenance building. It is estimated that renovation activities will be completed within 1 year. Following the completion of the renovation activities, Health Canada will complete the first of a series of site inspections. Upon receiving approval from Health Canada, we will begin recruiting screened employees and begin production.

6.0 Funding

This project will not require any government loans or grants and will be 100% funded by Trinity Bay Development Corp.

Appendix A – Site Location

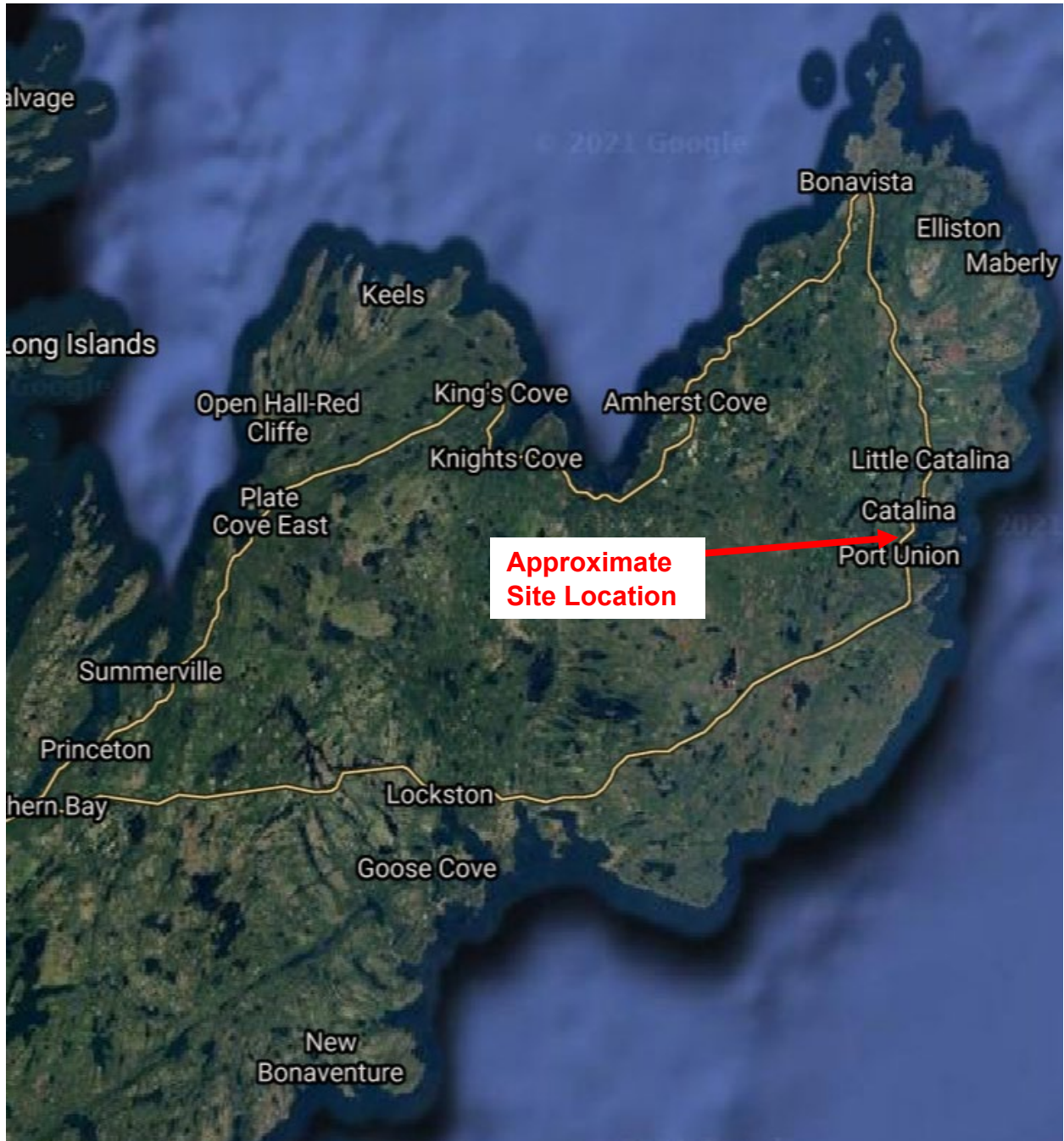
Figure 1: Site Location



Figure 2: Site Figure

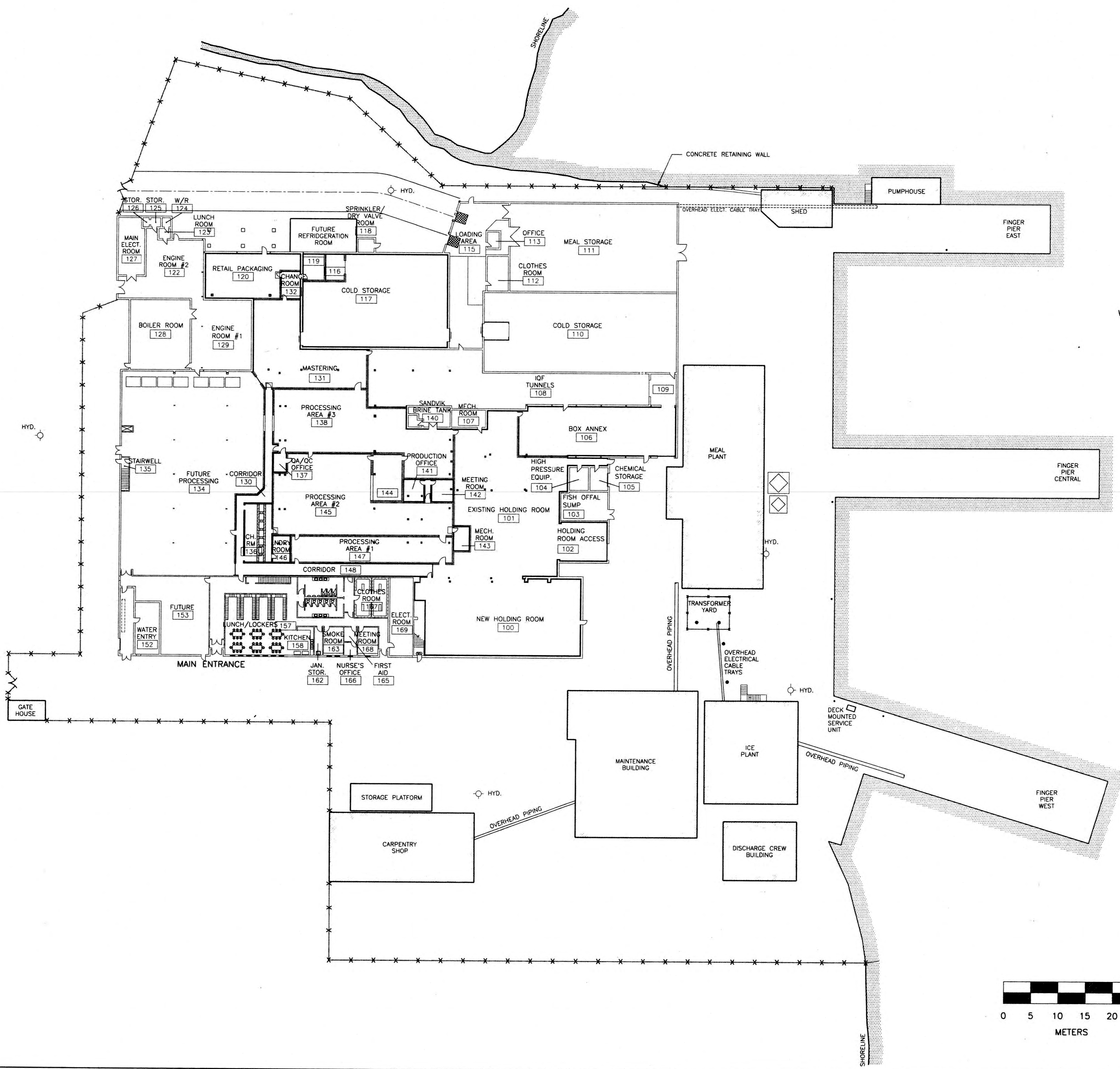


Figure 3: Surrounding Area



Appendix B – Site Survey

CABOT STREET



No.	Description	Date	By
REVISIONS			

PROVINCE OF NEWFOUNDLAND
 PERMIT HOLDER
 CLASS "A"
 This Permit Allows
 SGE GROUP INC.
 To practice Professional Engineering
 in Newfoundland and Labrador
 Permit No. as issued by APEON 80180,
 which is valid for the year 1998.



Prime/Civil/Structural Consultant
THE SGE GROUP INC.
 Engineers, Planners & Project Managers
 P.O. Box 13144, St. John's, NF, Canada A1B 4A4
 Phone: (709) 576-2344
 Fax: (709) 576-0374
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 St. John's • Clarenville • Corner Brook • Halifax • Moncton

Mechanical Consultant
Newton Engineering Ltd.
 Consulting Engineers
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 Tel: (709) 722-8613
 Fax: (709) 722-0910

Electrical Consultant
provincial consultants limited
 consulting engineers
 3 Hulse Street St. John's, Nfld. A1C 2S8
 Tel: (709) 736-8634
 Fax: (709) 736-0904

Owner
FPI FISHERY PRODUCTS INTERNATIONAL LIMITED

Project Title
PORT UNION SHRIMP PROCESSING FACILITY

PORT UNION NEWFOUNDLAND

Drawing Title
PROCESS SITE PLAN

Dwn. By W.P. / R.G.	Chk. By <i>R. Smith</i>
Date MAR. 1998	Scale AS SHOWN
Proj. No. 5971079.00	Sheet No. P-2
	Rev. No. 1

File name: S1079-P2.DWG Last plotted: 98/06/09 16:10

Appendix C – Security Measures

Facility Security Measures

Cannabis products are considered highly sought after, cash intensive consumables that require full scale security systems to effectively monitor the interior and exterior areas of production and distribution facilities 24 hours each day. The security system that we will implement will provide a safe and secure workspace for our staff and products that is more than capable of satisfying the Access to Cannabis for Medical Purposes Regulations (ACMPR).

Site Perimeter

The subject property is currently enclosed with a 7 ft high metal security fence. Modifications will be made to the fence to provide customers access to the retail area. All entrances will be locked and monitored by an onsite security guard and 24-hour video surveillance cameras.

In order to effectively monitor the subject properties exterior area, video surveillance cameras will be strategically positioned to avoid blind spots. The feed from the surveillance system will be monitored from the security office, as well as remotely by senior staff, if needed. Video feed will be recorded, documented, and filed in secured storage.

Further security measures will also include a motion detection system which will be installed along the interior side of the security fence, as well as along the waterfront in doorways throughout the interior area of the buildings. If triggered, an audible alarm associated with the system will sound and an electronic warning will be sent to a third-party security monitoring company, as well as a senior manager associated with our facility. Authorities will be contacted immediately, if required.

All information relating to incidents will be documented in a logbook. Logbook information will include:

- Date/Time of incident
- Names of individuals
- Description of Incident
- Incident response procedures
- Changes implemented as a result of the incident

Cannabis Production Areas

Cannabis will be present in the building's main operations area, more specifically the seed germination room, grow floors, drying room, packaging area, and a secure storage area. To gain access to these areas all staff members must provide identification and sign in at the security office. A sign-in/sign-out logbook will be available. Personal items such as food, beverages, coats, bags, purses, cell phones, etc. will not be allowed to be brought into the production areas. Random security checks will be completed regularly to ensure no unauthorized products enter or leave the main operations area. Access to

each of the production rooms will be restricted to individuals with approved authorization. Each individual access door associated with the production rooms will be monitored by 24-hour video surveillance, motion detectors, and an alarm system.

Seed Germination Area

This small area is where cannabis seeds will be readied for growth. The access door to this room will always be locked. An added physical barrier associated with this door involves the designation of a senior person to oversee unlocking the door, when required. The person in charge will always be physically present when employees are required to be in this area. A permanent record will be kept of the identity of each employee entering/exiting this area. This will be accomplished by written record completed by the person in charge. The record itself will contain the name of employee, date and time of access, and the employee's signature as well as the signature of the person in charge.

Grow Floor

This large open floor area is where all plants are grown. All other rooms are directly adjacent to this area. Only employees necessary to this aspect of production will be granted access.

Drying Room/Packaging Area

This is where product is dried to make ready for packaging and sale and is restricted to persons whose presence in those areas is required for work activities. The access door to this room will always be locked. An added physical barrier associated with this door involves the designation of a senior person to oversee unlocking the door, when required. The person in charge will always be physically present when employees are required to be in this area. A permanent record will be kept of the identity of each employee entering/exiting this area. This will be accomplished by written record completed by the person in charge. The record itself will contain the name of employee, date and time of access, and the employee's signature as well as the signature of the person in charge.

Secure Storage Area

This area is used to store product waiting for sale, seeds prior to germination, and spoilage/waste products waiting to be destroyed. This area will be strategically positioned in the building away from outside perimeter walls. The area will be locked with a combination locking system, and only senior individuals in charge and the quality assurance individual(s) will have access. The senior person in charge will always be present when access is granted to other individuals.

Other Secure Areas

Extensive security measures will be implemented to safeguard the facility's parking, retail, and shipping/receiving areas. Video surveillance systems will be installed to effectively monitor each area, motion detectors and associated audible alarm systems will be installed in each doorway, and security personnel will physically inspect areas regularly. Signage informing the public and site visitors of security measures will be posted.

The retail area will be limited to 56 Act exemption holders (i.e. licensed producers and retailers, registered individuals, authorized healthcare staff, etc.) during regular working hours (i.e. 10:00 am to 4:00 pm Monday to Friday). Retail staff will be positioned safely behind a counter constructed with a plexiglass window, equipped with a panic alarm button.

The shipping/receiving area will be monitored by a senior person in charge while activities are conducted. All delivery people will have to provide identification and sign/date a logbook.

Appendix D – Health Canada
Approved Pesticides

Approved Pesticides

The Pest Management Regulatory Agency (PMRA) maintains a database of registered pesticides approved for use on cannabis.

There are 21 registered pesticides approved by the PMRA for use on cannabis (marijuana) that is produced commercially indoors. They include:

- Actinovate SP
- Agrotek Ascend Vaporized Sulphur
- Bio-Ceres G WP
- Bioprotec Caf
- Bioprotec Plus
- Botanigard 22 WP
- Botanigard ES
- Cyclone
- Doktor Doom Formula 420 Professional Use 3-in-1
- Influence LC
- Kopa Insecticidal Soap
- Lacto-San
- MilStop Foliar Fungicide
- Neudosan Commercial
- Opal Insecticidal Soap
- Prestop
- Purespray green spray oil 13E
- Rootshield(R) WP Biological Fungicide
- Rootshield HC Biological Fungicide Wettable Powder
- Sirocco
- Vegol Crop Oil

Further information can be found on the Pesticides and Pest Management section of the PMRA website.

If licensed producers have questions or concerns regarding pesticides or would like approval on the use of particular pesticides, they are encouraged to contact PMRA for information.