Kruger Inc. Corner Brook Pulp and Paper Ltd.

Stakeholder Engagement Report

Contents

1.0 Introduction

There are many stakeholders on CBPPL limits, with interests in the social, cultural, ecological and economic benefits the forest can provide. Some draw their livelihood from the forest (outfitters and other tourism operators and commercial firewood operators), some use the forest for their recreational activities (e.g., snowmobiling, skiing, camping, fishing, hunting, hiking, boating) while others aim to ensure conserve, restore, and manage forest habitat for wildlife and humans alike. Interactions between stakeholders and CBPPL occur on several levels, some with the Planning Department of CBPPL through details of an Agreement or Memorandum of Understanding, and others through requirements to environmental and forestry certifications.

CBPPL is committed to ensuring the interests of stakeholders are maintained on the DFA. This is demonstrated in the pro-active approach CBPPL takes when approaching stakeholders to discuss proposed forest management operations in the vicinity of their interests. This mainly occurs during the 5-year planning process. Cooperating with stakeholders on the DFA can help to ensure their interests are protected.

This report will provide information with respect to concerns raised by residents of District 6, and show how CBPPL is either protecting or mitigating these interests as part of their Environmental Management System, as well as adherence to the Environmental Protection Guidelines (EPG's).

1.1 South West Gander Operating Area

The South West Gander 5YP area (K-06-07) is approx. 3,024ha is size and has a gross volume of 236,035m3. The area is comprised of ~70% spruce and 30% fir. The area is contained inside the Protected Water Supply Area for the Town of Gander. The area is sandwiched between two river systems, the Northwest and Southwest Gander rivers.

1.2 Forest Stakeholder November 16th Meeting

On November 16 at 1:30pm at the Appleton Town Office the following people were present at a meeting:

From CBPPL

Faron Knott – Chief Forester
Joel Taylor – General Operations Superintendent
Kim Childs – Sustainable Forest Management Forester
Jerome Compton – District Planner

Concerned Citizens

Chief Marie Vaders
Justin Hodge
Dean Gillingham
Gary Gillingham

Facilitator

Frank Skeard (also District Manager for FMD6)

1.3 Citizens Concerns

During the meeting the following concerns were raised.

- Boreal Felt Lichen, Blue Felt Lichen, Frosted Glass Whiskers, Turkey Tail Mushroom, Fiddle heads, Golden Chantrels
- Bald Eagles
- Chaga on White Birch Trees / Old Birch trees important
- Global Warming / Air Pollution
- "Deforestation"
- "Not much area left not cut"
- Marten and Caribou
- Road Access
- Cultural Heritage – Chert, Walking Trails

In the following sections we will describe how each of these items are incorporated into our Environmental Management System and how our Best Management Practices provide guidance to field operations.

2.0 Concerns

In the following sections we will describe how each of these items are incorporated into our Environmental Management System and how our Best Management Practices provide guidance to field operations.

2.1 Boreal Felt Lichen, Blue Felt Lichen

The **Boreal Felt Lichen** (*Erioderma pedicellatum*) is included on the International Union for Conservation of Nature's Red List that is found in Newfoundland. Boreal Felt Lichen is not listed in the Atlantic Canada Conservation Data Centre (AC CDC) database as occurring on the Corner Brook Pulp and Papers Defined Forest Area, and it is unlikely that the habitat for Boreal Felt Lichen occurs on the DFA (Claudia Hanel[1], personal communication, October 19, 2010). Even though this species has not been identified on CBPPL limits we have continued to educate and provide documentation to our contractors, planners, and operators on identification of this species. See Appendix A for the CBPPL Species At Risk Brochure which can be found on all harvesting sites and in the equipment at all times.

We have used A 5 Year (2006 – 2011) Management Plan For the Boreal Felt Lichen (Erioderma pedicellatum) In Newfoundland and Labrador by considering a Landscape Management approach based on ecological forest site types whereby suitable sites for potential Boreal Felt Lichen colonization adjacent to fertile Boreal Felt Lichen thalli are left to cycle naturally.

CBPPL Planners and Contractor Foremen were trained to identify Boreal Felt Lichen and suitable sites for potential Boreal Felt Lichen colonization. Training occurred where Boreal Felt Lichen is known to occur. A presentation was given to CBPPL staff and contractors on Boreal Felt Lichen identification, habitat and mitigation. In 2013, five sites in Districts

[1] Claudia Hanel, Ecosystem Management Ecologist, Botanist, NL Dept. of Fisheries and Land Resources

15 & 16 most likely to have Boreal Felt Lichen were identified through mapping exercises. Qualified ecologists spent six working days searching for Boreal Felt Lichen on these sites but none were found.

It is expected that priorities may change as the understanding of Boreal Felt Lichen biology and management increases. Memorial University (Grenfell), College of the North Atlantic, NL Government and Canadian Forestry Service (NL) have developed a working predictive model to identify areas of suitable habitat for Boreal Felt Lichen on the central Avalon Peninsula. Future research will investigate the population ecology of Erioderma and other lichen species in the lab and in the field with the aim to restore lichen populations in managed landscapes.

The **Blue Felt Lichen** (*Degalia plumbea*) is listed under the Newfoundland and Labrador Endangered Species Act (NLESA) as vulnerable and is not currently listed by the Species at Risk Act (SARA). It is found in moist habitats or close to stream and lake margins. In Newfoundland it grows mainly on yellow birch but very occasionally occurs on white spruce.

The other mushrooms and ferns that were listed are widespread across the province.

2.2 Bald Eagles

The Bald Eagle is present throughout the province of Newfoundland. The conservation of existing nest sites is included in the Environmental Protection Guidelines (EPG's) under section 1.2.4.2.III. It states

"No forestry activity is to occur within 800 metres of an active bald eagle nest or osprey nest during the nesting season (March 15 to July 31) and 200 metres during the remainder of the year"

Corner Brook Pulp and Paper is committed to protection of raptor nests and follows the guidelines as set out in the EPG's for such species.

Ad part of the EPG's leaving a minimum of 10 snags (i.e. standing dead trees) or other suitable living trees is a requirement that provides habitat for birds and mammals on cutover sites. Preference is given to larger trees as they are more valuable as habitat.

2.2 Chaga

Chaga is a fungus that grows on birch trees in the province. To provide viable habitat for Chaga the harvest of large birch trees is not recommended, and the Yellow Birch is considered a species of exceptional conservation value by CBPPL. CBPPL is known to leave birch trees of any species or age in the cut blocks. Limiting certain areas from Domestic Cutting maps can also be a way to control unwanted birch harvest.

2.3 Global Warming/Air Pollution

As the name states these topics are of global concern. CBPPL is working in collaboration with FFA to develop a Green House Gas Management Plan which will measure the effectiveness of Forest Management prescriptions, in turn producing forests that are a carbon sink. By using the Carbon Budget Model and the Woodstock Wood Supply Model

together it is expected that various scenarios can be inputted to determine harvest and or silviculture intensity needed to offset any GHS emissions from the harvest activity itself.

2.4 Deforestation

Harvesting does not constitute deforestation as harvested land will regenerate and remain in a forested state. The resource is renewable and sustainable. CBPPL has been harvesting on its landbase for nearly 100 years!

Provincial guidelines stipulate that regeneration assessments should be made within 5 years of harvesting and that areas not sufficiently stocked must be brought up to stocking standard. Depending on the nature of the area, these assessments are sometimes done much earlier (e.g. 2 years), so that any required remedial treatments can begin sooner.

CBPPL conducts regeneration surveys to assess harvested areas for sufficient stocking using the provincial government's Regeneration Stocking Standard for Newfoundland and Labrador, and Regeneration Assessment Procedures for Newfoundland and Labrador. The assessment procedures record the presence of acceptable softwood regeneration, and other species on predetermined plots. CBPPL's Certificate of Managed Lands requires that the company provide results of the regeneration surveys to t he provincial government. To give context to these results the table below shows the stocking percent for the last 5 years.

Year	Areas Sufficiently Stocked
2016	95.1%
2017	95.6%
2018	95.6%
2019	95.7%
2020	96.1%

2.5 Concerns over Amount of Past Harvest

In 2020, The Annual Allowable Cut (AAC) for each forest management district is determined through a provincial wood supply model which was re-run in 2016. The model was created through a landbase netdown process that excludes land that is unavailable to harvest. Using best available data on forest inventory, yield curves and habitat considerations, the model ensures sustainability across the landscape. An array of values, objectives, indicators, and targets are satisfied across a 160-year planning horizon. The table below shows how District 6 has been managed sustainably.

Forest Mgmt. District	Total Class I & Class III AAC Available m^3 (Core and Operational)	Harvested 2011	Harvested 2012	Harvested 2013	Harvested 2014	Harvested 2015	Harvested 2011 - 2015 (Average/Yr.)	% of AAC Harvested 2011-2015*
6	76,600	65,897	28,590	16,029	51,646	0	32,432	42%
Forest Mgmt. District	**Total Class I & Class III AAC Available m^3 (Core and Operational)**	**Harvested 2016**	**Harvested 2017**	**Harvested 2018**	**Harvested 2019**	**Harvested 2020**	**Harvested 2011 - 2015 (Average/Yr.)**	**% of AAC Harvested 2011-2015***
6	69,342	0	0	0	0	0	0	0%

* In any one year the harvest may exceed the AAC, but the average for the 5 years cannot exceed the AAC available.

2.6 Pine Marten and Caribou Habitat

In 2020, spatial data for caribou was revised and updated to reflect enhanced core ranges for those herds where data exists. Caribou guidelines are being updated to reflect this revision and to address continued conservation concerns for the Island's populations. Continued declines in some populations, most notably the Northern Peninsula (Aides, Gros Morne, Hampton and NP groups) is cause for concern, particularly in light of the impending 2024 re-assessment by COSEWIC. The species is currently listed as "special concern", just shy of legislative requirements should this status be downgraded.

The revised caribou model is based on identifying individual home-ranges, which, pending the degrees of overlap, define the new Caribou Core Ranges. Overlaps were captured at a *70th %ile, known as Tier 1* – most intense and consistent used area over decades, *30th %ile, known as Tier 2* – consistent use with slightly less intensity, and *10th %ile, known as Tier 3* – capturing additional seasonal ranges and migratory corridors that should be avoided. For herds where insufficient or no data exist, this exercise was not completed.

Based on a range of criteria those caribou herds have been divided into *Conservation herds* and *Restoration herds*. The conservation target for *Conservation herds* is to maintain habitat at status quo, with an objective to improve overall habitat conditions; whereas the general conservation target for *Restoration herds* include activities that will restore habitat, especially within calving cores and migration paths.

Previously created (2015) *Spring Kernels* (used to visualize calving areas) are also being incorporated.
Forestry and Wildlife Branch (FFA) worked cooperatively to create a simplified layer for Forest Planning based on the herd status and conservation targets.

Currently the caribou herds in District 6 are considered restoration herds. As part of the collaborative work with the Wildlife Division, CBPPL will either decommission or identify roads that would be considered habitat. The ratio of newly built to restored road is a 1:1.5km off-set. Planners will use stereo photography from the FFA department to identify these areas. Anticipated harvest in D6 has no caribou concerns as they fall outside the primary spring core kernels within Tier 1 and Tier 2 and any overlap with the secondary core areas would have only a temporal avoidance window due to calving season.

With respect to Pine Marten in district 6, there have been no concerns raised from Department of Wildlife. There are no known mitigations required, and there are only temporal constraints during denning period. Staff have been reporting Pine Marten sightings to the Environmental Management Representative and this information is shared with the Wildlife Division on an annual basis. It is known that Marten populations have been increasing over several years and it is expected that in the new year they will be delisted.

2.7 Road Access

Forest access roads provide a route by which transportation to and from the forest are possible. Although the primary function of such a road is the extraction of wood fibre, they are also used for access by the general public. Various groups such as hikers, hunters, anglers, snowmobilers, and berry pickers utilize these roads for access to the DFA

Corner Brook Pulp and Paper Limited builds approximately 70+ kilometers of forest access road each year. These roads are required to facilitate the harvest of ~530,000 m^3 of timber annually.

Roads provide many positive economic and social benefits such as recreation, forest management, fire protection, and non-timber forest products, but at the same time could have a negative impact on the ecological function of an area. Direct effects are habitat loss, fragmentation, hydrological impacts, and over hunting due to increased public access.

To mitigate the negative effects that road access can have it is possible that sections of road could be decommissioned once operations are complete. The use of winter road is also an effective way to limit access to areas after harvest. All infrastructure that CBPPL has installed is the property of the company. Decommissioning of roads can also include the removal of bridges which would prevent unwanted influx of land users.

Discussions during the meeting with concerned citizens resulted in gaining no consensus on roads issues. In one instance the building of new road was not acceptable but the removal of structures and decommission of road was also not acceptable.

2.8 Cultural Heritage and Historic Sites

The 5YP is sent to all departments/divisions within government for comment/feedback. For this particular 5YP we have not received any guidance on areas to avoid for the South West Gander boundary.

As per the EPG's section 1.2.2 Archaeological Find

"When an archaeological site or artifact is found, the Historical Resources Act requires that all development temporarily cease int eh area and the discovery be reported to the Provincial Archaeology Office"

3.0 February 22, 2022

On February 22 at 1:00 pm at the Appleton Town Office the following people were present for a meeting:

From CBPPL

Faron Knott – Chief Forester
Joel Taylor – General Operations Superintendent
Kim Childs – Sustainable Forest Management Forester
Jerome Compton – District Planner

Concerned Citizens

Chief Marie Vaders
Justin Hodge
Dean Gillingham
Gary Gillingham
Garrett Watten – Mayor Town of Appleton
Jason Kinden – Mayor Town of Glenwood
Sheldon Gillingham
Ryan Steele

GovNL

Jeri Graham (Natural Areas Division)
Paul Carter (Department of Environment and Climate Change)
Dave Poole (Forestry and Wildlife Branch)
Jackie Walkins (Minister John Haggies Office)

During the meeting Justin reviewed the concerns that were raised at the last meeting as well as some new concerns. Attached in Appendix B. These new concerns included Salmon and Trout stocks and the Towns Water Supply/Watershed.

Corner Brook Pulp and Paper adheres to all Environmental Protection Guidelines (EPG's) with respect to riparian buffers. This area is also located in a Protected Water Supply Area and additional permits are required to work in these special areas. Permit can be found in Appendix C. Within the EPG's Section 5: Guidelines for Forestry Operations within Protected Public Water Supply Areas, states:

Guidelines for Forestry Operations within Protected Public Water Supply Areas

The primary function of a Protected Public Water Supply Area (PPWSA) is to provide the public with an adequate quantity of safe and good quality water on a permanent basis and to meet its present and future demands. By definition, a Protected Public Water Supply Area is the area of land and water designated as a Protected Public Water Supply Area, for a municipal authority operating a waterworks or using or intending to use a water sources, under Section 39 of the *Water Resources Act.* Any other activity within a Protected Public Water Supply Area is considered secondary, and if permitted, must be strictly regulated and monitored to ensure that the water supply integrity is not threatened and the quality of the water is not impaired.

In Newfoundland and Labrador forestry operations are permitted in most Protected Public Water Supply Areas on a limited and controlled basis provided the proposed operations have no or minimal, water quality impairment potential. More specifically, commercial forest harvesting of more than 10 per cent of the total land area of the Protected Public Water Supply Area, or 10 per cent of the total merchantable timber; whichever is less, in any 12 month period will not be permitted.

The following permits and approvals are required prior to the beginning of any forestry operations, whether commercial or domestic operations, and includes road construction, silviculture activities, and harvesting within a Protected Public Water Supply Area:

I. Approval of the Five-year operating plan by the Environmental Assessment Division of MAE,
II. Issuance of a permit under section 39(6) of the *Water Resources Act* which will include consultation with the community involved. Applications for development inside Protected Public Water Supply Area can be obtained from the Water Resources Management Division website (Appendix I).

Conduct of Operations

All permits and contracts should include any conditions outlined under section 39(6) of the *Water Resources Act*. In addition to environmental guidelines specified in sections above, the following will apply in Protected Public Water Supply Areas.

Map of Operating Area

The appropriate Forestry or Company official will provide the operator with a map indicating the harvesting area and the location of no-cut buffer zones, and will ensure the operator is familiar with the boundaries and conditions of the approved detailed plan of operations.

Prevention of Erosion

In areas sensitive to erosion, depending on the nature and location of the proposed forestry operation, the Water Resources Management Division may not permit the activity to take place. However, where permitted, the following mitigation measures should be put in place:

1. Sensitive areas prone to erosion and areas which have high potential for erosion can be harvested if proper harvesting and site restoration techniques are a part of a detailed plan.
2. Wherever possible, extraction trails should run along contours and avoid wetlands.
3. Use of landings will be minimized. Any approved landing area shall be less than 0.25 ha and located at least 150 metres from Protected Public Water Supply intake ponds.

Buffer Zones

No ground disturbance riparian buffer zone requirements in Protected Public Water Supply Areas are as follows:

Water Body	Width of Buffer
Intake Pond, Lake or Reservoir	Minimum 150 metres
River Intake (for a distance of 1000 metres upstream and 100 meters downstream)	Minimum 150 metres
Main River Channel	Minimum of 75 metres
Major Tributaries, Lakes or Ponds	Minimum of 50 metres
Other Waterbodies	Minimum of 30 metres

Any deviation will require approval from Water Resources Management Division.

Petroleum Products

Fuel storage and the operation of fuel storage equipment are regulated by the *Storage and Handling of Gasoline and Associated Products Regulations*, 2003 as amended and the *Heating Oil Storage Tank System Regulations*, 2003 as amended.

In addition to the above regulatory requirements and Sections 1.2.5.1 to 1.2.5.5 the following are to be adhered to;

I. If fuel must be stored in the Public Protected Water Supply Area, it must be in the least sensitive area and be approved by the Water Resources Management Division.
II. Refueling must not take place within 150 metres of an intake pond.
III. All tanks must be located at a minimum distance of 500 metres from any major waterbody.
IV. A fuel or oil spill clean-up kit must be kept on site to facilitate any clean-up in the event of a spill. This kit must include absorbent pads, loose absorbent materials such as dried peat, speedy-dry or sawdust, a container such as an empty drum for recovering the fuel or oil, and a containment boom.

Structures Prohibited in Water Supply Area

1. Dormitory camps, garages or any other structures are prohibited within a Protected Public Water Supply Area.

2. The establishment of new sawmills is not permitted in Protected Public Water Supply Areas.

Reporting Water Quality Problems

Any water quality impairment problem should be reported immediately to the Water Resources Management Division.

All spills/leaks regardless of size are reported to Woodlands Staff at CBPPL. Any repair to hoses on equipment is also reported. It is a requirement that leak reporting is sent to GovNL as part of the company's legal requirements.

The PWSA permits are issued by the Department of Environment and Climate Change Water Resources Management Division. There are 5 pages of Terms and Conditions which are to be met, in order to operate in this area. These include buffering requirements, equipment storage, fuel storage, disposal of garbage, as well as the submission of a completion report at the end of the proposed project.

Potential for fuel contamination was of extreme importance to members of the towns who use Gander Lake as their source of drinking water. In the PWSA permit Fuel Storage Items 39-48 list all measures and requirements that need to be in place. The company is required to have contingency plans in place as well. CBPPL has already developed contingency plans for all our operations, and we have emergency response equipment available on all sites, and on all equipment. See Appendix D for the company's emergency response plan for fuel spill.

The potential for degradation of water quality has also been identified as a Significant Environmental Aspect. Training is given to all employees regarding measures that can be taken to prevent a sedimentation event from occurring on the job site. We have developed multiple Standard Operating Procedures which describe the best practices that should be used. Emergency response equipment is also mandatory on all job sites to manage a sedimentation event. See Appendix E.

Next steps:

Staff at CBPP have offered to meet with the Town Council of Appleton and Glenwood to give them the same presentation that was given at the first meeting. The Mayor of Appleton responded with a request for the presentation so they can review it first. This presentation, along with other information (Emergency Response Fuel Spill, and Environmental Training – Fuel Spill) was sent on Feb 24, 2022.

CBPP Staff will also provide mapping of Southwest Gander to the concerned citizens. It is expected that once this mapping is provided that a decision will be made by the citizens to either agree to work with the company so harvesting can take place, or that there is no compromise to be had.

It is therefore the opinion of CBPPL that the company commits to work with the concerned citizens group to address concerns, once operations commence. We would offer to set up a monitoring committee, who would include CBPPL staff, harvesting contractor representation and members of the concerned citizens group. This group could meet regularly during the planning and execution stages of harvesting. We feel that this would satisfy the EA requirements.

As stated earlier, this is not a process to determine "go or no go", but one to ensure that consultation with this concern citizens group was taking place, and that all avenues are being explored to come to a resolution or agreement.

CBPPL has a legal right to manage this resource.

The next meeting, if there will be one, is planned for mid-March.

4.0 May 3, 2022

On May 3rd at 1:00 pm at the Appleton Town Office the following people were present for a meeting:

From CBPPL

John MacLellan – Woodlands Manager
Faron Knott – Chief Forester
Kim Childs – Sustainable Forest Management Forester
Jerome Compton – District Planner

Cathy Dornan – PR Consultant for Corner Brook Pulp and Paper

From GovNL

Joanne Sweeney – Director EA Department
Tara Kelly – ADM Department of Environment
Aubrey Gover - Office of Indigenous Affairs and Reconciliation (Virtually Attended)
Paul Carter – EA Department (Virtually Attended)
Devon Ryan - Office of Indigenous Affairs and Reconciliation (Virtually Attended)
Jackie Watkins – Minister Haggies Office

Concerned Citizens

Justin Hodge
Dean Gillingham

Other Guests

Chief Brendan Mitchell
Ward Chief Calvin Francis

Derm Flynn – Cabin Owner
Sheldon Gillingham – Councillor Town of Appleton
April Hodge – Justin Hodges Fiancé
Daphnie Jedore – Elder
Jim Dinn – NDP Leader
Gram Wood – WERAC

The meeting agenda consisted of a roundtable and opening remarks, followed by a presentation on the concerns that were brought forward by the concerned citizens. This was led by John MacLellan, Woodlands Manager for Corner Brook Pulp and Paper. The group was engaged, and many questions were asked during the presentation. After the presentation a series of maps were laid on the tables with a request for the group to identify areas that were of particular concern to them. After a short break Justin Hodge produced a map for review which consisted of a gridded area which they would like for CBPPL to remove from its harvest plan indefinitely. They gave CBPPL staff permission to take it for review. A follow-up meeting was scheduled for May 6th.

5.0 May 6, 2022

On May 6th at 11:00 am at the Appleton Town Office the following people were present for a meeting:

From CBPPL

John MacLellan – Woodlands Manager
Faron Knott – Chief Forester
Kim Childs – Sustainable Forest Management Forester
Jerome Compton – District Planner

Concerned Citizens

Justin Hodge
Dean Gillingham
Marie Vaters

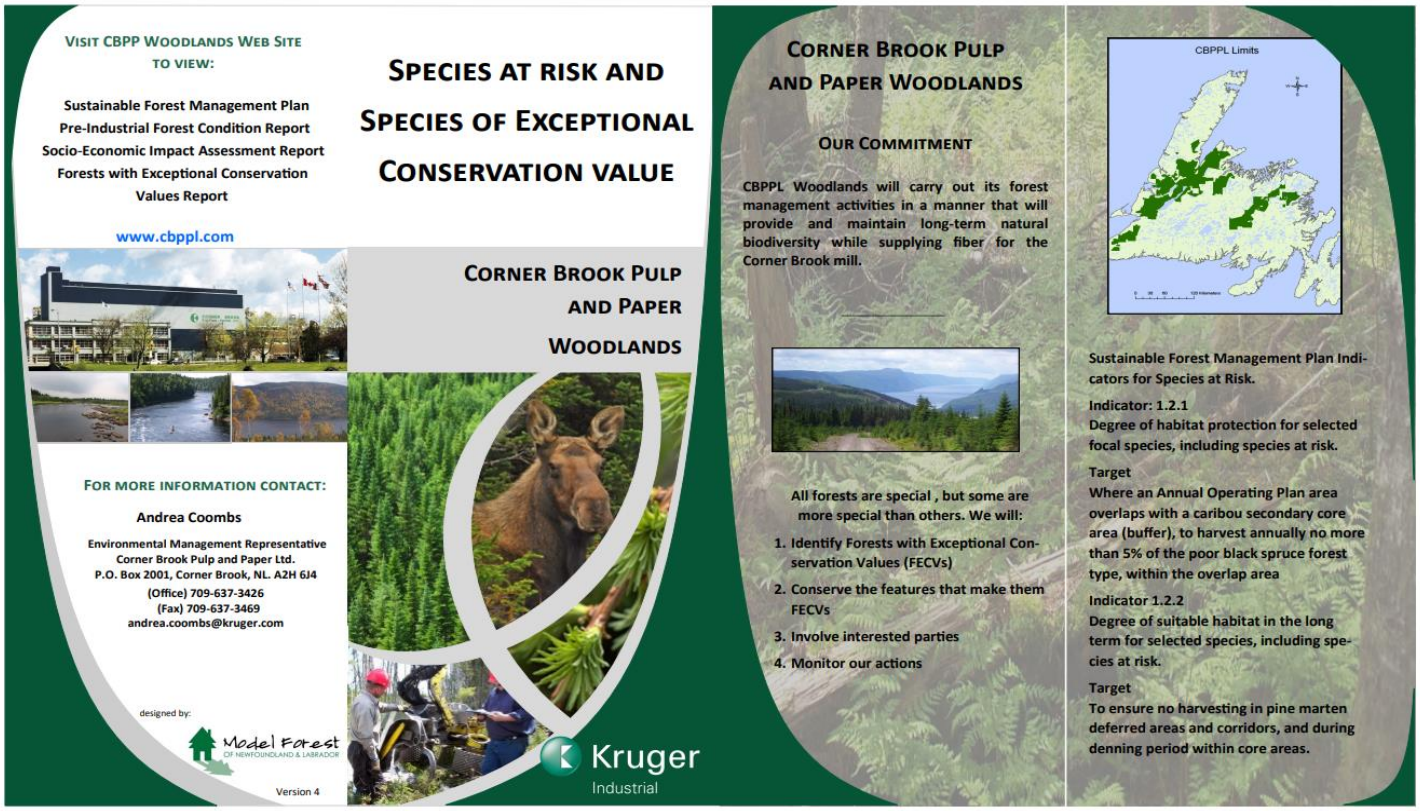
The original proposal by the concerned citizens consisted of 53km2, and a volume of 65,000m3. This offer is not financially feasible given the cost of bridge and road construction needed vs. the amount of volume that would be harvested. Corner Brook's counteroffer consisted of 16km2 and 30,000m3 of volume to be set aside. Buffers were widened along the NW and SW Gander Rivers to 500m vs the 100m (as required in the Environmental Protection Guidelines).

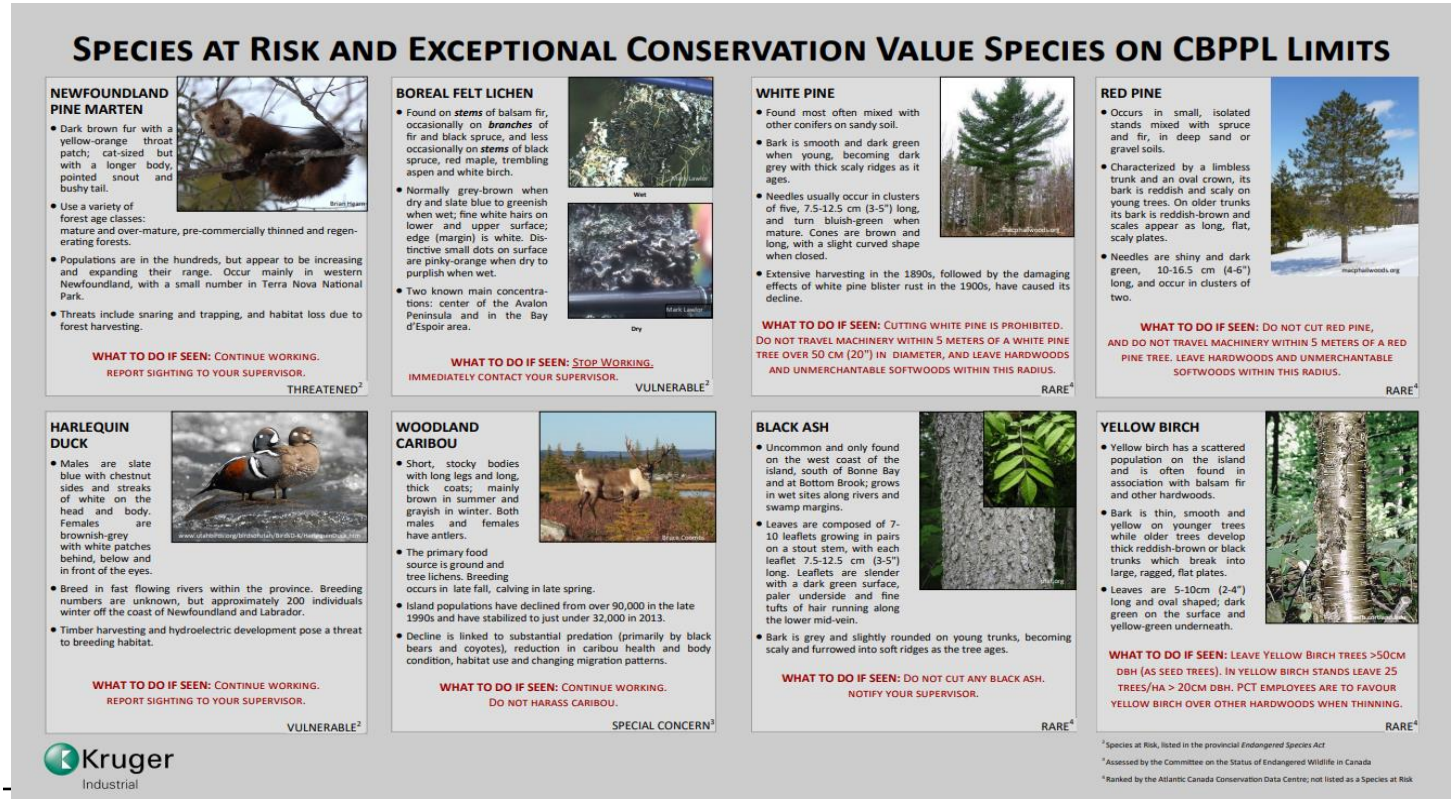
See the reproduced offer and counteroffer map in Appendix F. (Map will be attached separately for review).

We have committed to working with the group over the life of this five-year plan.

6.0 Appendices

A. Species at Risk Brochure





B. Handouts provided at meeting #2 by Justin Hodge

Charlie's Place (Meeting # 2 Point's)

Report from Gerald Kazman(Mycologist with over 50 years of experience

- Charlie's Place creates its own Microclimate from moisture of 2 rivers (Class 4 & Class 2), and lake. Heat inversion keeps soil moist under canopy supporting ideal conditions for growth and mycelium.
- All mushrooms are sold at an average of $10 per lb. People from all ages can easily make $200 per day, for a season that lasts up to eight (8) weeks. Individuals can make up to $25000 a season.

Benefits Include:

- All ages can harvest without license of degrees
- Money for low-income families for food, clothing, other expenses, education, and vehicles
- Support for mental health well being, and more time with their family.
- Engaging with youth to lower drug use, crime, suicide, and alcohol use.
- Exercise lowering health care costs.

Gerald is willing to work and educate the community on sustainable harvesting and when and where.

He has worked with eleven (11) different communities that are still thriving today leaving zero environmental footprints.

Pg 1

Salmon and Trout Stocks

With salmon returns in the area at record lows and the mortality rate of young par rising dramatically, it is with good reason that DFO, has sounded that alarm for conservation and environmental protection. With climate change and deforestation, pollution and overfishing being proven to be the main causes of this potential disaster, it is with good reason that the residents of Glenwood, Appleton, and Gander have requested a total halt of cutting in the Charlie's Place area.

Removing the canopy from this area will result in a dramatic rise in soil temperatures, which in turn will cause ground water and tributaries to rise in temperature as well.

With over 100 small tributaries that directly find their way to the Northwest and Southwest Gander River, and one rather large brook that runs the entire length of this area, we feel that the risk factor is extreme for an already threatened salmon return that has seen closure of the two rivers in the last several years due to high water temperatures.

Sediments-Charlie's Place soil consists of mostly glacial till, with the tree canopy removed, the protective top layer of moss and vegetation will dry up and die causing sediments to enter tributaries, carrying it through the system damaging vital trout spawning grounds, and finally making it to the river causing further devastation to the breeding grounds and habitat.

Town Water Supply/Watershed

As mentioned before Charlie's Place exists between the pristine waters of Northwest and Southwest Gander Rivers, on a high ridged plateau. At the top of the plateau smack dab in the middle of the region is a rather large pond that measures 1km in length. This pond is fed by dozens of smaller tributaries and the runoff from rain and ground water and has some of the best drinking water in the vicinity.

The outlet of this pond is located at the northern end and runs the entire length of Charlie's Place and flows directly into Gander Lake via Joe's Feeder and it is also known to have a large annual run of trout from Gander Lake, even a small run of Atlantic Salmon that have been caught in otter traps on their way back to the sea in late fall. This would explain the source of salmon parr in the pond above.

This is one of the areas targeted by CBPPL, to be harvested. It would only take a minute amount of fuel or hydraulic oil, and heaven forbid a large spill to contaminate the environment, and with the brook acting as a direct conduct to Gander Lake, it would poison the drinking water for the residents of three towns.

Indigenous Rights and Freedoms

We as Indigenous People of Glenwood and Appleton, have sat back and slowly watched our traditional lands, traplines, fish and wildlife habitat be dissected bit by bit, until only a fraction of its glory remains. For thousands of years our ancestors have lived in harmony and balance with nature, and only harvested what was necessary to survive.

Our recent meeting with the elders has confirmed so many red flags that had been risen for years. We estimate that only 10% of our original traplines remain along with a drastic decline in trout and salmon stocks. The wildlife seems to be the hardest hit with caribou herds nearly totally wiped out, along with lynx, and fox, which are also in a drastic decline, and small game a mere shadow of what was once a main source of food for our families.

Many of our elders and low-income families cannot afford the basic amenities with the prices of food, heat, light, fuel, which are forever rising. It is often a choice between rent or food for our children.

Therefore, we cannot afford to lose our last remaining habitat (Charlie's Place) where the few remaining wildlife have taken refuge.

We are also looking forward to working with Mr.Kazman. With his support and education, we can hopefully provide a future for our children.

THERE IS A LIGHT AT THE END OF THE TUNNEL

TOWN OF
APPLETON

Site 4 Box 31, Appleton NL A0G 2K0
Tel: 709-679-2289 | Fax: 709-679-5552
townofappleton@personainternet.com | www.townofappleton.ca

February 21, 2022

Minister John Haggie
131 Airport Blvd.
Gander, NL
A1V 1T5

Dear Minister Haggie:

I write to you in regards to Corner Brook Pulp and Paper (Krugar) Forest Management Plan. In particular, District 6 (Zone 3). This proposed harvesting area has the potential to impact a basic human right which is, clean drinking water. In addition, it has the potential to impact our Tourism & Recreation, Social & Cultural Sustainability, and negatively affect a viable economic generator for our region.

The Town of Appleton was informed of Corner Brook Pulp and Paper Forest Management Plan several weeks ago by a concerned resident. This person has formed an action group to bring all parties together to discuss matters arising with the plan. We will be taking part in these discussion going forward.

Our immediate concern is the impact on our Watershed. The Town of Appleton, which also supplies water to the Town of Glenwood, draws directly from the Gander River. Any activity in around the river, lake and its tributaries need to be closely monitored. Clean drinking water is a valuable resource and essential to life. We are already feeling the pressure of increased mineral exploration in our area. Increased activity that occurs within the watershed elevates the likelihood of an incident exponentially.

Second, the areas of Careless Cove (K-06-03) and Southwest Gander (K-06-07) have long been a recreation haven to many, making up a large part of our regions tourism and serves as a base of operations for outfitters and alike. The area is located close to the Trans Canada Highway, an International Airport and has an abundance of back roads that make travel favorable for recreation enthusiasts.

Appleton was built around hunting, fishing and forestry. We need to find a balance so one does not out trump the other. In addition the Qalipu First Nations people, which make up a significant portion of our residents, have cultural significance to the areas of Northwest and Southwest Gander Rivers and will be greatly impacted by the proposed cutting plan.

I write to you requesting an immediate suspension of all activity by Corner Brook Pulp and Paper in the area of Careless Cove (K-06-03), Southwest Gander (K-06-07), District 6 as well as the area of Little Harbour (K-05-18), District 5 until a thorough review and consultation process has been completed.

We remain available to answer any questions you might have and look forward to working with all parties to find a fair and equitable resolution.

Yours truly,

Garrett Watton

Garrett Watton - Mayor

c.c. Mr. Justin Hodge

To: justin hodge <jdgillingham@hotmail.com>

Subject: Re: Minister office contact

February 21, 2022

Dear Minister Haggie,

I am writing this letter to you to express greatest concern for the actions of the Corner Brook Pulp and Paper (Kruger) Forest Management Plan as they develop land around the areas of Glenwood and Appleton – in particular District 6 (Zone 3). Their plan to harvest this area raises many concerns, particularly the possible impact on the town's water source, our cultural sites and our tourism sector.

Currently the Corner Brook Pulp and Paper Forest Management Plan is harvesting in areas extremely close to the watershed for our towns. This makes our town's water source extremely vulnerable to contamination through the use of their extensive equipment and the possibility of contaminant leaks such as hydraulic fluid. Furthermore, the trees in this area offer shade which keeps water temperatures down. Once water temperatures rise, we see an increase in lead levels which was the situation we were in two years ago and resulted in a boil order for over two months. The Towns of Glenwood and Appleton share this water source and rarely does any company or group receive approval to work in this area. It is our opinion that we must act promptly and collectively to ensure that our most valuable resource and the health and safety of our residents are protected and respected.

The areas of Careless Cove and Southwest Gander, which also plan to be harvested, hold significant value to our towns as these areas generate a great deal of tourism in terms of hunting, fishing and exploration. The harvesting of this area will undoubtedly affect the wildlife available due to loss of their habitats and habitable living conditions.

Finally, as you are well aware, a large number of our residents are of Indigenous descent and the areas in which the Forest Management Plan intend to harvest (Northwest and Southwest Gander) are of cultural significance to these residents. We feel that this should take utmost consideration.

I am aware that some concerned citizens have formed a group to address these concerns. We fully support this and plan to join them in their efforts to seek clarification and take possible actions to remedy this situation.

I would kindly request that you take this situation seriously and hope that we can proactively work together to find a common ground and a solution that respects all parties affected.

Sincerely,

Jason Kinden

Mayor – Town of Glenwood

A brief history of the harvesting of wild botanicals in Western Canada.

In the late 70's in the boreal forest of coastal British Columbia, a botanical treasure had been found. This treasure that is highly revered by the Japanese culture is known as the Matsutake Mushroom which was discovered on the forest floor near the small community of Darcy B.C.

I was very fortunate to be living in the area in the late 70's to see the start of this industry. In the beginning there were only a handful of us harvesting and learning about this hidden treasure found in the boreal forest in the Darcy area. Within a few weeks as we passed on this knowledge and experience to the First Nations communities in the area, it sparked a new enthusiasm from a select few. We learned that a Japanese buyer in the Vancouver area was willing to pay top dollar for these tasty botanical beauties.

Each day we would walk the forest floor in search of this wonderful prize. As many of us were seasonal workers, the fall was the perfect time to add extra income while enjoying fresh air, exercise and a quality time with close friends and family.

In the days to come we became familiar with the buyer in Vancouver and had agreed upon a price per pound. After 3 to 4 days of harvesting we would consolidate our mushrooms and I would drive them down through the mountains to the lower mainland and personally deliver them to the buyer. We would be paid for our weight per pound. The buyer explained to us and showed us how the mushrooms would be packed and stored and what quality measures would have to be put in place while harvesting.

The weeks would pass and because of this new found excitement, more people in the community had started searching for this mysterious prize on the forest floor.

After a couple of years some devastating news was given to the Blackwater Road area. The news was a logging company in the area had applied to log 10kms of the Blackwater Lake Road. This was devastating news for the community which had seen a new found industry which had evolved in the two previous seasons of that

time. A protest was organized by the community to stop the logging in the area. The question would be asked: *Would the community gain by wiping out a forest sector in a few years for a short-term dollar value and wait for 50 to 60 years for that area to start to mature or let this sector stand and have yearly sustainable harvest for the next 50 years?* This area is also teaming with wild life such as: grizzlies, black bear, cougars, lynx, black tail and white tail deer. Not to mention all the other plants, medicines and herbs that grow naturally in the area. Logging would also harm the fish species in nearby lakes, rivers and streams.

The protest on Blackwater Lake Road informed the government that they would have to revisit this matter and it was decided that it would be a logical and environmental decision to deny the logging contract.

40 years later the harvest is still going and each year the community flourishes.

The interest was high and because of this a suggestion was made to start a remote buying station in the area. As year round employment in the area was scarce, this added income was a welcomed extra to the families of the N'Quatque First Nations. This remote buying station consisted of: a buyer from the community, a digital scale, and specialty mushroom baskets which the mushrooms would be graded and packaged for delivery. A cooling room was constructed to keep the mushrooms cool prior to delivery to the lower mainland.

A family who has resided since 1961 was set up as the local buyer. The family has bought every year for the last 40 years and is still buying as of this date.

The original few of the harvesters now see their sons, daughters and grandchildren following in their footsteps.

As years passed by, buyers from other export companies have moved into the area and more and more people have become involved in all aspects of the harvest.

As the news became known across Western Canada, that not only Matsutake Mushrooms but other edible varieties were found. The new had spread to Saskatchewan where a large amount of Chanerelle Mushrooms were found. In the years following a mushroom harvesting industry was born.

As this was new to Northern Saskatchewan, the government of First Nations and Indian Affairs began to set up harvest orientations to show how ethical harvesting should be carried out and how the industry works.

In closing, the Saskatchewan industry of harvesting of wild botanicals has followed in the B.C. template and is growing every year.

C. SouthWest Gander Operating Area PWSA Permit

Government of Newfoundland and Labrador
Department of Environment and Climate Change
Water Resources Management Division

PERMIT FOR DEVELOPMENT

Pursuant to the *Water Resources Act*, SNL 2002 cW-4.01, specifically Section(s) 39

Date: **JANUARY 20, 2022**

File No: **550-01-02-04-075**
Permit No: **PRO12286-2022**

Permit Holder: **Corner Brook Pulp and Paper Woodlands**
P.O. Box 2001
Corner Brook, NL
A2H 6J4
Jerome.Compton@kruger.com

Attention: **Jerome Compton**

Re: **Gander WSMC - Gander Lake PPWSA - Forestry - Corner Brook Pulp and Paper Woodlands**

Permission is hereby given for : **commercial wood harvesting activities (3416 ha.) and road construction in the Gander Lake Protected Public water supply area (used by the towns of Gander, Glenwood and Appleton) with reference to the application dated October 22, 2021.**

- This Permit does not release the Permit Holder from the obligation to obtain appropriate approvals from other concerned municipal, provincial and federal agencies.
- The Permit Holder must obtain the approval of the Crown Lands Administration Division if the project is being carried out on Crown Land.
- This Permit is subject to the terms and conditions indicated in Appendices A and B (attached).
- It should be noted that prior to any significant changes in the design or installation of the proposed works, or in event of changes in ownership or management of the project, an amendment to this Permit must be obtained from the Department of Environment and Climate Change under Section 49 of the *Water Resources Act*.

(for) MINISTER

GOVERNMENT OF NEWFOUNDLAND AND LABRADOR
Department of Environment and Climate Change

File No: **550-01-02-04-075**
Permit No: **PRO12286-2022**

APPENDIX A

Terms and Conditions for Permit

PPWSA General

1. All operations must be carried out in a manner that prevents damage to land, vegetation, and watercourses, and which prevents pollution of bodies of water.

2. Any areas adversely affected by this project must be restored to a state that resembles local natural conditions. Further remedial measures to mitigate environmental impacts on water resources can and will be specified, if considered necessary in the opinion of this Department.

3. All persons working on this project must be informed that they are within a Protected Public Water Supply Area, and must be made aware of all conditions of this Permit. A copy of this Permit must be on site during operations.

4. The attached Completion Report (Appendix C) for Permit No. 12286 must be completed and returned to this Department upon completion of the approved works. Pictures must be submitted along with the completion report, showing the project site prior to and after development.

5. An undisturbed (no cutting or ground disturbance) buffer zone of at least **300 metres** shall be maintained around Gander Lake, at least **100 metres** along both sides of all streams and main tributaries running into Gander Lake, at least **50 metres** around Soulis Pond and at least **30 metres** around all ponds and along both sides of all other water bodies. Activity or development within these buffer zones is prohibited. All buffer zones must be marked with signs or flagging tape to avoid encroachment into the buffer zones.

6. All waste material is to be collected in refuse containers, and disposed of at an approved waste disposal site outside the Protected Public Water Supply Area in accordance with the *Environmental Protection Act, SNL 2002 cE-14.2.*

7. Equipment storage, maintenance facilities associated with this project, and all maintenance other than emergency repairs must not be located/carried out within the Protected Public Water Supply Area.

8. The Department reserves the right to require that the Permit Holder follow, and cover all costs incurred by the Permit Holder or this department, associated with any water quality monitoring program that may be ordered by the Minister for the purpose of ensuring that the water quality is maintained within acceptable guidelines.

9. Officials of the Department and the appropriate Municipal Authority, Operator, or Watershed Management Committee may visit the site to ensure compliance with this Permit.

10. Liaison is to be maintained with the appropriate Municipal Authority and Environmental Scientist. If there are any specific problems (ie sedimentation, fuel spill, other potential water quality impairment), the Chair of the Water Supply Committee must be notified immediately at (709)651-5915. The Environmental Scientist must also be notified immediately at (709)292-4280.

11. Motorized vehicles, including snowmobiles and ATVs, shall not be used to cross the frozen surface of Gander Lake, the intake pond within the Protected Public Water Supply Area.

12. Treated wood shall not be used in a water body or within buffer zones established in Condition 5 of any water body measured from the high water mark. The use of creosote treated wood anywhere within the Protected Public Water Supply Area is strictly prohibited.

13. The Permit Holder must inspect the site daily, and any water quality impairment related problems are to be reported immediately to the Environmental Scientist at (709)292-4280 and the appropriate Municipal Authority or Watershed Monitoring Committee at (709)651-5915.

14. The location of the work is highlighted on the Location Map for this Permit attached as Appendix D.

15. This Permit is valid for five (5) years from the date of issue. If required, an application for Permit renewal must be submitted prior to the expiry date.

16. Any changes in water quality resulting directly from this project, rendering the water unsuitable as a public water supply, are the responsibility of the Permit Holder. The Minister may order the Permit Holder to provide an alternate source of potable water to the affected community until water quality returns to an accepted level.

17. All vehicles and equipment must be in good working order with no leaking fuel, oil, or other harmful substances that could impair water quality.

18. All stationary motorized equipment and associated fuel tanks shall have metal trays, absorbent pads or impervious liners under them to catch and contain in excess of 110 % of the aggregate volume of any fuel, lubricant and oil.

19. Drainage from roads and other disturbed areas into any body of water must first be discharged into a settling pond, a vegetated area or pass through a sedimentation fence where all suspended material can settle out before draining into any body of water.

20. Any streams not visible on a 1:50,000 scale map (including field identified streams) shall require a minimum buffer of 30 m.

21. For any clearing inside buffer zones: no ground disturbance (no disturbance to the root mat, no grubbing, or removal of soil) shall take place in the buffer zones. The Permit Holder is to ensure that the appropriate best practices are employed to prevent any detrimental effects that could impact water quality. Where possible, work in buffer zones shall be completed when the ground is frozen.

22. Where permits, licences, approvals or authorizations are issued by multiple governments, departments or agencies, in the case of similar conditions, the more stringent of those shall prevail; in the case of conflicting conditions, the Permit Holder shall seek clarification and direction in writing from each of the respective departments or agencies.

23. The Permit Holder is required to ensure that adequate sanitary (bathroom) facilities are available or provided on site. This may be in the form of a portable toilet, chemical toilet, pit privy (outhouse), sub-surface disposal system, or municipal sewer system. If a portable toilet or chemical toilet is used, the waste water must be disposed of in a septic disposal system approved by Service NL, or at an approved waste disposal site, outside the Protected Public Water Supply Area in accordance with the Environmental Protection Act, SNL 2002 cE-14.2. If a pit privy (outhouse) or sub-surface disposal system is used, it must be located outside the required buffers, and be subject to Service NL standards, requirements and approval.

24. The issuance of this permit does not guarantee, nor set precedent, that additional or similar permits or amendments will be issued in this or any other Protected Public Water Supply Area for additional or similar activity or development.

25. Any activity within a freshwater body (including wetlands and flood risk areas), requires a Permit under Section 48 of the Water Resources Act, 2002. This Permit refers to Section 39 of the Water Resources Act, 2002 and does not grant permission for the above stated work including fording and/or culvert or bridge installation.

Commercial Harvesting

26. Unless listed below, all conditions of the *Guidelines for Forest Operations Within Protected Water Supply Areas*, outlined in the **2018 Environmental Protection Guidelines for Forestry Operations in Newfoundland and Labrador**, must be strictly adhered to.

27. The felling or disposing of trees, parts of trees, sawdust, bark, logging debris or slash into a water body or upon the frozen surface of a water body is strictly prohibited.

28. In order to discourage post commercial harvesting activities and increased access to the area, a **Closure Plan** shall be developed by the Permit Holder in consultation with the Department, the appropriate Municipality Authority, or Watershed Monitoring Committee, and affected stakeholder groups.

29. In conjunction with the above-referenced **Closure Plan** the Permit Holder will ensure that if the area does not naturally regenerate, it will be scarified and planted in accordance with standard protocols.

30. The Permit Holder shall post **'No Cutting'** signs on designated buffer zones.

Trails

31. Fill material must be obtained from an approved quarry site. It must not be taken from beaches or streams, and must not be dredged from a body of water.

32. Removal of streambank vegetation or trees is not permitted. Overhanging brush that collects snow and blocks ice movement may be pruned and cut back to allow free flow of water.

33. Where sand or gravel is used in the construction of roads, these areas must be closely monitored during and after periods of heavy rainfall for any signs of erosion or washout.

34. Road embankments near watercourses must be adequately protected from erosion by sodding, seeding or placing of rip-rap.

35. The constructed works must comply with all other terms and conditions provided in the Crown Lands grant, lease, or license for occupancy.

36. Permit Holder must avoid construction activities in wetlands wherever possible.

37. Motorized Snow Vehicles and All-Terrain Vehicles Regulations must be strictly adhered to.

38. Heavily travelled areas must be kept well drained to prevent the formation of mud puddles which can contribute to erosion and siltation events.

Fuel Storage

39. Fuel storage shall be limited to 7 days worth of fuel, or a maximum of three (3) self-contained dyked units as detailed below, whichever is less. Every precaution must be made to keep these tanks secure, and protected as far as possible from vandalism. Furthermore, every precaution shall be made to prevent spills, leaks, or other discharges from these tanks during refueling by fuel suppliers and refueling of equipment. Storage sites shall be located only within operating areas, on landings and along road right-of-ways only, and at least 500 metres from any water body or wetland.
    - Tank 1, 19516, ID D-917029, 2,345 litres - BURSEY MFG INC.
    - Tank 2, GF-GAP09-120020.05,ID 1584, 4500 litres - AGB Products Inc.
    - Tank 3, 19476, ID 240, 4,546 litres - Atelier Gerard Beaulieu.

40. A complete oil spill clean-up kit must be on site at all times when gasoline or fuel powered equipment is being used or refueled. The kit must contain the following:
    - Fire pump and 100 metres of hose
    - Two hand operated fuel pumps
    - Six recovery containers such as empty 205 litre drums
    - Four shovels
    - Two pick axes
    - Ten metres of containment boom
    - Twenty-five absorbent pads
    - One hundred litres of loose absorbent material

41. All registration conditions for fuel tanks listed in Condition 39 must be strictly adhered to. Any deviation from these conditions requires the written approval of both Service NL and this Department.

42. Contaminated snow and soil must be removed from the site and disposed of at an approved location outside the protected public water supply area, in accordance with the *Environmental Protection Act, SNL 2002 cE-14.2.*

43. Once storage tanks are installed and put into operation, every effort shall be made to prevent spills, leaks, or other discharges from the system. The Permit Holder shall put in place procedures to prevent overfilling, security of the hose and nozzle, refueling, as well as a contingency plan to deal with spills, leaks or other discharges.

44. Any spills of gasoline, fuel or oil, regardless of volume, shall be reported immediately to the Environmental Scientist and the Watershed Management Committee by calling (709)292-4280 and (709)651-5915 respectively. Furthermore, all spills in excess of 70 litres shall be reported immediately to the 24 hour spill report line at 1-800-563-9089.

45. Refueling sites shall be located at least 150 metres from any water body or wetland.

46. The Permit Holder must notify the Environmental Scientist at trentpollett@gov.nl.ca and the Watershed Monitoring Committee at info@gandercanada.com prior to relocating fuel storage tanks within the PPWSA. The notification shall include the appropriate location information and anticipated date of relocation.

47. In the event of a spill, the Permit Holder's Contingency Plan must be followed.

48. The Permit Holder must inspect the fuel storage tanks at least twice per day while in use. Storage tanks are to be removed from the PPWSA if the Permit Holder is unable to inspect the tanks within 72 hours.

GOVERNMENT OF NEWFOUNDLAND AND LABRADOR
Department of Environment and Climate Change

File No: **550-01-02-04-075**
Permit No: **PRO12286-2022**

APPENDIX B

Special Terms and Conditions for Permit

1. The Permit Holder and its agent(s), subcontractor(s), and consultant(s) shall keep all systems and works in good condition and repair and in accordance with all laws, by-laws, directions, rules and regulations of any governmental authority. The Permit Holder or its agent(s), subcontractor(s), or consultant(s) shall immediately notify the Minister if any problem arises which may threaten the structural stability of the systems and works, endanger public safety and/or the environment or adversely affect others and/or any body of water either in or outside the said Project areas. The Permit Holder and its agent(s), subcontractor (s), and consultant(s) shall be responsible for all damages suffered by the Minister and Government resulting from any defect in the systems and works, operational deficiencies/inadequacies, or structural failure.

2. The Permit Holder and its agent(s), subcontractor(s), and consultant(s) shall operate the said Project and its systems and works in a manner which does not cause any water related and/or environmental problems, including but not limited to problems of erosion, deposition, flooding, and deterioration of water quality and groundwater depletion, in or outside the said Project areas. The Permit Holder and its agent(s), subcontractor(s), and consultant(s) shall be responsible for any and all damages associated with these problems caused as a result of changes, deficiencies, and inadequacies in the operational procedures by the Permit Holder or its agent(s), subcontractor(s), or consultant(s).

3. If the Permit Holder or its agent(s), subcontractor(s), or consultant(s) fails to perform, fulfil, or observe any of the terms and conditions, or provisions of this Permit, as determined by this Department, the Minister may, without notice, amend, modify, suspend or cancel this Permit in accordance with the *Water Resources Act*.

4. The Permit Holder and its agent(s), subcontractor(s), and consultant(s) indemnify and hold the Minister and Government harmless against any and all liabilities, losses, claims, demands, damages or expenses including legal expenses of any nature whatsoever whether arising in tort, contract, statute, trust or otherwise resulting directly or indirectly from granting this Permit, systems and works in or outside the said Project areas, or any act or omission of the Permit Holder or its agent(s), subcontractor(s), or consultant(s) in or outside the said Project areas, or arising out of a breach or non-performance of any of the terms and conditions, or provisions of this Permit by the Permit Holder or its agent(s), subcontractor (s), or consultant(s).

5. This Permit is subject to all provisions of the *Water Resources Act* and any regulations in effect either at the date of this Permit or hereafter made pursuant thereto or any other relevant legislation enacted by the Province of Newfoundland and Labrador in the future.

6. This Permit shall be construed and interpreted in accordance with the laws of the Province of Newfoundland and Labrador.

File No: **550-01-02-04-075**
Permit No: **PRO12286-2022**

cc: Mr. Trent Pollett
Environmental Scientist, Drinking Water
Water Resources Management Division
Department of Environment and Climate Change
3 Crommer Avenue
Grand Falls - Windsor, NL
A2A 1W9
trentpollett@gov.nl.ca

cc: Ms. Paula Dawe, P.Eng.
Manager, Drinking Water and Wastewater Section
Water Resources Management Division
Department of Environment and Climate Change
P.O. Box 8700
4th Floor, West Block, Confederation Building
St. John's, NL A1B 4J6
pauladawe@gov.nl.ca

cc: Town of Appleton
P.O. Box 31, Site 4
Appleton, NL A0G 2K0
townofappleton@personainternet.com

cc: Town of Gander
100 Elizabeth Drive
Gander, NL A1V 1G7
info@gandercanada.com

cc: Town of Glenwood
P.O. Box 130
Glenwood, NL A0G 2K0
townofglenwood@hotmail.com

cc: Ms. Laurie Holloway, CO IV
Gambo District Office
Dept. of Fisheries and Land Resources
PO Box 310
Gambo NL A0G 1T0
LaurieHolloway@gov.nl.ca

Government of Newfoundland and Labrador
Department of Environment and Climate Change
Water Resources Management Division

Appendix C - Completion Report

Pursuant to the *Water Resources Act*, SNL 2002 cW-4.01, specifically Section(s) 39

Date: **JANUARY 20, 2022**

File No: **550-01-02-04-075**
Permit No: **PRO12286-2022**

Permit Holder: **Corner Brook Pulp and Paper Woodlands**
P.O. Box 2001
Corner Brook, NL
A2H 6J4
Jerome.Compton@kruger.com

Attention: **Jerome Compton**

Re: **Gander WSMC - Gander Lake PPWSA - Forestry - Corner Brook Pulp and Paper Woodlands**

Permission was given for : **commercial wood harvesting activities (3416 ha.) and road construction in the Gander Lake Protected Public water supply area (used by the towns of Gander, Glenwood and Appleton) with reference to the application dated October 22, 2021.**

I (the Permit Holder named above or agent authorized to represent the Permit Holder) do hereby certify that the project described above was completed in accordance with the plans and specifications submitted to the Department of Environment and Climate Change and that the work was carried out in strict compliance with the terms and conditions of the Permit issued for this project.

Date: _____ Signature: _____

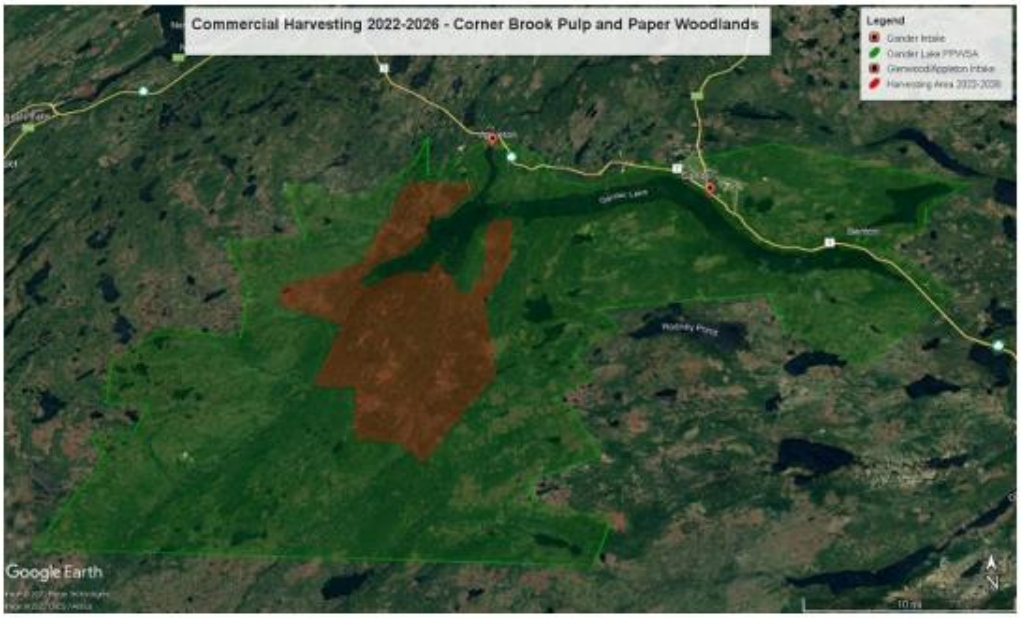
This completion report must be completed and forwarded to the following address upon completion of the approved work.

Department of Environment and Climate Change
Water Resources Management Division
PO Box 8700
St. John's NL A1B 4J6

GOVERNMENT OF NEWFOUNDLAND AND LABRADOR
Department of Environment and Climate Change

File No: **550-01-02-04-075**
Permit No: **PRO12286-2022**

APPENDIX D
Location Map for Permit



D. Emergency Response – Fuel Spill

Kruger Publication Papers — Corner Brook Pulp and Paper Woodlands				Emergency Response Procedure
EMS Reference 8.2	Date May 23, 2018	Version 8	Section 4 Page 1 of 3	

4.0 FUEL/OIL & HAZARDOUS PRODUCTS SPILL EMERGENCY RESPONSE

4.1 EMERGENCY FUEL/OIL & HAZARDOUS PRODUCTS SPILL RESPONSE FLOW CHART

Spill Observed

↓

STOP THE FLOW

- Stop Operations, Shut off all Equipment, Shut off the Valve - Do What it Takes to Stop the Flow
- No Smoking or Ignition

↓

Evaluate Hazards

- Identify Spill Materials and Quantity
- Assess for Nearby Water Bodies
- Assess Site for Slope and Soil conditions
- Assess for Power lines

↓

CONTAIN THE SPILL

- Initiate Containment Using the **Spill Kit**
- Prevent Spill from Flowing into Water
- Wear Proper Personal Protective Equipment
- Properly Dispose of Contaminated Material

(Disposal contact information on page 3)

↓

GET HELP

- Notify Spill Response Crew
- Notify Supervisor or Foreman
- Contact Operations Superintendent

↓

Fuel & Oil (hydrocarbons)

- **Report spill** (excess of 70 L) to **Spill Report Number 709-772-2083** or **Government Services Center 1-800-563-9089**
- **Complete an *Environmental Incident Report* and forward it to the Environmental Management Coordinator**

Document valid for 48 hours from date printed. Check CBPP Woodlands EMS for most current version	Date Printed: February 24, 2022

4.2 EMERGENCY FUEL/OIL & HAZARDOUS PRODUCTS SPILL RESPONSE PROCEDURE

1.) **STOP THE FLOW** - **Attempt** to stop the flow of fuel or oil immediately by stopping operations, shutting off equipment, shutting off the valve, or pumping out the tank.
2.) **Assess** the situation and recognize the problem.
3.) **Identify** the type and volume of the spill.
4.) **Identify** and evaluate any potential problems that may be encountered during the control, containment, and cleanup of the spill. Assess the site for special considerations such as streams and ponds.
5.) **CONTAIN THE SPILL -** Remove any sources of spark or flame.
6.) **Take action** using the Spill Kit and the proper Personal Protective Equipment. Be sure to store recovered fuel in containers and properly dispose of contaminated material.
7.) **CALL FOR HELP- Alert** the Spill Response Team and notify your supervisor. Any spill in excess of 70 liters must be reported immediately to the **24-hour Spill Report Number 709-772-2083,** or **Government Services Center 1-800-563-9089.**
8.) **Document** the spill on *Environmental Incident Report* and forward to the Operations Superintendent.

4.3 EMERGENCY FUEL/OIL & HAZARDOUS PRODUCTS SPILL RESPONSE REQUIREMENTS

A fuel/oil spill clean-up kit must be kept on site to facilitate any clean up in the event of a spill. This kit must include absorbent pads, loose absorbent materials such as dried peat, speedy-dry or sawdust and a container such as an empty drum for recovering the fuel/oil. **All spills are to be cleaned up immediately with spills in excess of specified quantities as per the "*Jobsite Hazardous Products Checklist*" reported to the appropriate agencies.**

The clean-up kit must include the following list of fuel/oil spill clean-up equipment:

- 25-High Performance Absorbent Pads
- 5-8 ft. Sorb-Sox
- 10-4 ft. Sorb-Sox
- 1-44 liter bag of Oclansorb
- 1-7" x 10" Sorb-Sox "Boom"
- Spark Proof Shovel
- Heavy Duty Garbage Bags
- Safety Rubber Gloves
- 1 Hand Operated Fuel Pump

The approximate sorbent capacity of this kit is 216 litres.

4.4 WASTE OIL AND CONTAMINATED SOIL DISPOSAL

CONTAMINATED SOIL

Trent Quinton Newfoundland Soiltec Inc. Corner Brook Phone: 709-634-5533	Wayne Turpin Newfoundland Soiltec Inc. Sunny Side (near Come by Chance) Phone: 709-685-9606 Wayne.Turpin@soiltec.ca
GDH Environmental 215 Carolina Avenue, Stephenville Phone: 709-643-9090	Universal Environmental Services Inc. Soil Treatment Facilities Phone: 709-227-4289 709-227-5509 709-687-5410

WASTE OIL, CONTAMINATED PADS AND RAGS

Crosby Industrial Pasadena Phone: 709-686-5665	Pardy's Waste Management Pasadena Phone: 709-686-2013
Central Newfoundland Waste Management Norris Arm Phone: 709-653-2900	Green Bay Waste Management South Brook, Halls Bay Phone: 709-657-2233
Oil Retailers over 1000 liters	

E. Emergency Response – Sedimentation

5.0 SEDIMENTATION EMERGENCY RESPONSE

Sedimentation is *"when a waterbody that normally runs clear is discolored as a direct result of our activities"*.

5.1 Sedimentation Emergency Response Flow Chart

Sedimentation is observed

↓

Determine Cause of Sedimentation
- Excessive rain?
- Soft ground conditions or excessive topsoil?
- Muddy water build up on existing roads with potential to be splashed into ditches?
- Steep terrain?

↓

Notify the Sedimentation and Erosion Control Response Crew, your Supervisor and other Crew Members

↓

Take Action
- Stop Operations if necessary
- Construct a sediment trap using straw bales or filter fabric

↓

Correct the Problem at the Source if Possible

↓

Assess area for potential damage to streams, rivers, ponds, water supply basins, etc.

↓

Contact Corner Brook Pulp and Paper Operations Superintendent at 637-3108

↓

Document
- Fill out an *Environmental Incident Report*
- Forward the report to the Environmental Management Coordinator

5.2 Sedimentation Emergency Response Procedure

Sedimentation is the process of very fine sediment particles being carried by stream velocities and deposited in slower moving water. This material can be particularly harmful to fish, fish and wildlife habitat, and drinking water. This is why it is essential to reduce the effects of sedimentation to a minimum. When sedimentation is suspected on a job site the following steps should be taken:

1). Determine the cause of the sedimentation. Was it excessive rain, soft ground conditions or excessive topsoil, muddy water build up on existing roads with potential to be splashed into ditches, or steep terrain?

2.) Notify supervisor and other crew members.

3.) Stop operations if necessary. Construct a sediment trap using straw bales or filter fabric.

4.) Assess the potential for environmental damage to streams, rivers, ponds, water supply basins, etc.

5.) Fill out an Environmental Incident Report and forward it to the Environmental Management Representative.

6.) Contact Corner Brook Pulp and Paper Operations Superintendent at 637-3108.

.

5.3 EMERGENCY RESPONSE REQUIREMENTS & EROSION CONTROL FOR SEDIMENTATION

Many harvesting areas are prone to erosion. Corner Brook Pulp and Paper requires its contractors to have sediment control materials on site to mitigate the potential impact of its activities. Harvesting contractors are required to have a minimum of 10 bales of hay stored on their job sites at all times, for use in stabilizing soils, filtering sediment-laden water, or mitigating some other environmental problem. Straw bale sediment traps offer an inexpensive and effective sediment control device. The purpose of the straw bale structure is to provide a short-term dam in a drainage ditch. The water velocity behind the bale is reduced such that sediment settles out and clean water flows over the top.

To construct a straw bale sediment trap:

1) Excavate a trench the width of a straw bale and the length of the proposed barrier to a depth of 15 centimeters (6 inches).

2) Place the bales tightly together on their sides in the trench. Drive two wooden stakes through each bale deep enough to anchor them securely. Wedge loose straw as a filler between any cracks.

3) Backfill and compact the excavated soil against the barrier.

F. Offer and Counteroffer Map