



Cavendish Beef Farm

Environmental Protection Plan

January 2023

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1.0 INTRODUCTION

Viking Fur Farm Inc. (Viking) is continuing the farm's diversification into cattle farming with the expansion of pasture land on the ocean side, west side, of Route 80 and hayland on the interior, east side of the highway. The farm will establish a 100 cow/calf beef herd (producing 75 calves per year) on an additional 120 acres of pasture and 110 acres of hay land. It will take about six years to develop the hayland/pasture and four years to expand the beef herd to 100 cow/calf operation.

Following the release of the environmental assessment process and the issuance of regulatory permits and authorizations, land clearing will proceed in the spring of 2023. In advance of land clearing all merchantable wood will be removed from the land to be cleared in 2023. A resource access road will be constructed/upgraded to facilitate access for wood removal and land clearing equipment required to clear the remaining brush, removal of rocks and cultivation of land for farm purposes. The farmland expansion is illustrated on Map 1 and the schedule for development is stated on table 1.

The Environmental Protection Plan (EPP) is applicable to land clearing, cultivation and seeding. In addition, it applies to the operations associated with beef farming and the spreading of manure from the existing mink farm.

1.1 PURPOSE AND SCOPE OF THE EPP

The purpose of the EPP is to outline protection and response measures associated with the potential environmental effects related to the development of land for pasture and hay production and the establishment of a 100 head cattle operation. The plan also explains actions regarding the spreading of manure from the existing mink farm. The plan describes procedures, including best management practices to reduce or eliminate the potential of adverse environmental effects. The procedures, including personnel responsibilities for planned activities and response to unplanned events are included.

1.2 OBJECTIVES OF THE EPP

The objectives of the EPP are to develop and manage the farm, including the development/cultivation of farm land and beef herd expansion, in an environmentally responsible manner. The EPP includes the following objectives:

- To reduce the risk of adverse environmental impacts
- To describe potential environmental concerns and appropriate protection measures.
- To provide a reference document to guide personnel for:
 - Planning the development of land
 - Expansion of the beef herd

- How to respond quickly and effectively to incidents which may have an environmental impact
- To provide a reference to all applicable guidelines, regulations, directives and other requirements, including permitting
- Provide a reference as to internal and external communications
- To demonstrate the owner's commitment to meeting and where applicable, exceeding requirements to ensure the farm is operated in an environmentally responsible manner.

1.3 ORGANIZATION OF THE EPP

The EPP contains the following sections:

Section 1.0 outlines the overall purpose, objectives, organization, roles and responsibilities of those involved to ensure the EPP is effectively implemented.

Section 2.0 is a description of planned activities

Section 3.0 includes a list of permits, approvals and authorizations which may be required for the Project.

Section 4.0 describes environmental concerns and general environmental protection measures associated with development and operations of the project, in respect to the Guidelines for the preparation of the Environmental Impact Statement. (EIS)

Section 5.0 outlines the contingency plans, including internal and external communications, for potential unplanned and accidental events which could occur during the development and operation of the farm.

1.4 ENVIRONMENTAL POLICY

Viking is committed to the development and operation of farmland and beef farming in a manner to prevent and reduce adverse effects on the biophysical environment and upon people and communities. This commitment also applies to the existing mink farm.

As Viking develops farm land and expands its beef herd, the company will implement a community engagement initiative to inform communities as to the progress of the development in the short term, one year and medium term, two years, during which time Viking will engage with the public, communities and Government to identify and effectively respond to environmental risks and opportunities as part of its commitment to continually improve its farm practices in a manner which will improve environmental performance. Viking will comply with all applicable environmental guidelines, best management practices regulations and standards to prevent, mitigate and manage environmental risks. Viking will make every effort to exceed requirements to further reduce potential of environmental risks on the biophysical and social environment. Viking recognizes environmental management is an on-

going activity that affects the entire company and those who provide goods and services to the company.

Viking's environmental policy and commitments as stated in procedures and commitments related to the environmental protection measures in this Environmental Protection Plan shall be clearly communicated to employees with responsibilities for the implementation of procedures and any other suppliers of goods and services to Viking. Training, including trial runs, will be conducted with the relevant employees and contractors.

The preparation of the Environmental Protection Plan (EPP) will facilitate Viking's formulation of:

- A plan to fulfill its environment policy
- The development of its capabilities and support mechanisms to achieve environmental objectives and targets
- An ability to measure, monitor and evaluate its environmental performance
- The ability to review and continually improve its environmental management and its overall environmental performance.

Viking has developed an Odour Control Management Plan (OCMP) for farmland development, beef herd expansion and farm operations. The OCMP will describe odour sources, mitigations, public consultation and methods for complaint reporting, response and resolution.

Viking has prepared and will follow an Environmental Effects Monitoring Plan (EEMP) including a follow-up plan for the monitoring effects from the farm.

2.0 PROJECT DESCRIPTION OVERVIEW: Farm land development and beef herd expansion

Following the release from the Environmental Assessment (EA) process and the acquisition of all permits and other approvals, the farm will proceed with the upgrading of a resource access road and on farm access to facilitate land clearing. The anticipated timeframe for land clearing is described in Table 1.

Farmland Development:

- All merchantable wood will be harvested, followed by the removal of the remaining trees, brush, roots and other vegetation.
- The land will be levelled (smoothed) to facilitate the use of farm equipment during land development and on-going farm practice, such as seeding and harvesting of hay.
- Rocks, boulders and the remaining trees, brush, roots and other vegetation will be placed in windrows
- Buffers, exceeding typical government requirements will be maintained.
- Land clearing will take place during dry conditions to facilitate the use of heavy equipment and to minimize the removal of topsoil

- Whereas soils are naturally acidic and have low fertility, soil productivity will be enhanced with the addition of agricultural limestone and manure
- Annually, the first cutting of hay will be baled as dry hay and the second cut, baled in silage wrap.

Beef Cattle:

The cattle pasture will be expanded on the ocean side of Route 80. The process is similar to land development for hay, however because the need for farm equipment is less than forage, land, levelling and rock removal are not as important.

The existing herd will expand to a 100-cow cattle operation by about 2026. Other than the addition of a bull(s) to provide for herd diversity, the herd will be expanded through on-farm breeding.

The development of the herd will include the following:

- Establishment of natural shelter by the maintenance of windrows and forested areas
- Sustainable levels of grazing would be maintained by ensuring sufficient grazing land for the cattle in the grazing season and outside the grazing season by feeding the animals bales of hay at various locations to keep the animals active and to spread grazing over the entire pasture to maintain pasture health.
- Calves are typically born in the spring which coincides with the availability of fresh pasture and weather conditions conducive to the rearing of health animals.
- The animals will have access to water from existing barns and natural water holes
- The animals will be processed at licensed abattoirs.

MAP 1 (Lots)

Viking Fur Inc., Cavendish, NL
Index of Titles & Structures



NTS Reference TN14
 NMO_2002_LUTM_ZONE_ZON
 Transverse Meridian

Department of Fisheries and Land Resources
 Agriculture and Lands Branch
 Agricultural Land
 April 13, 2023

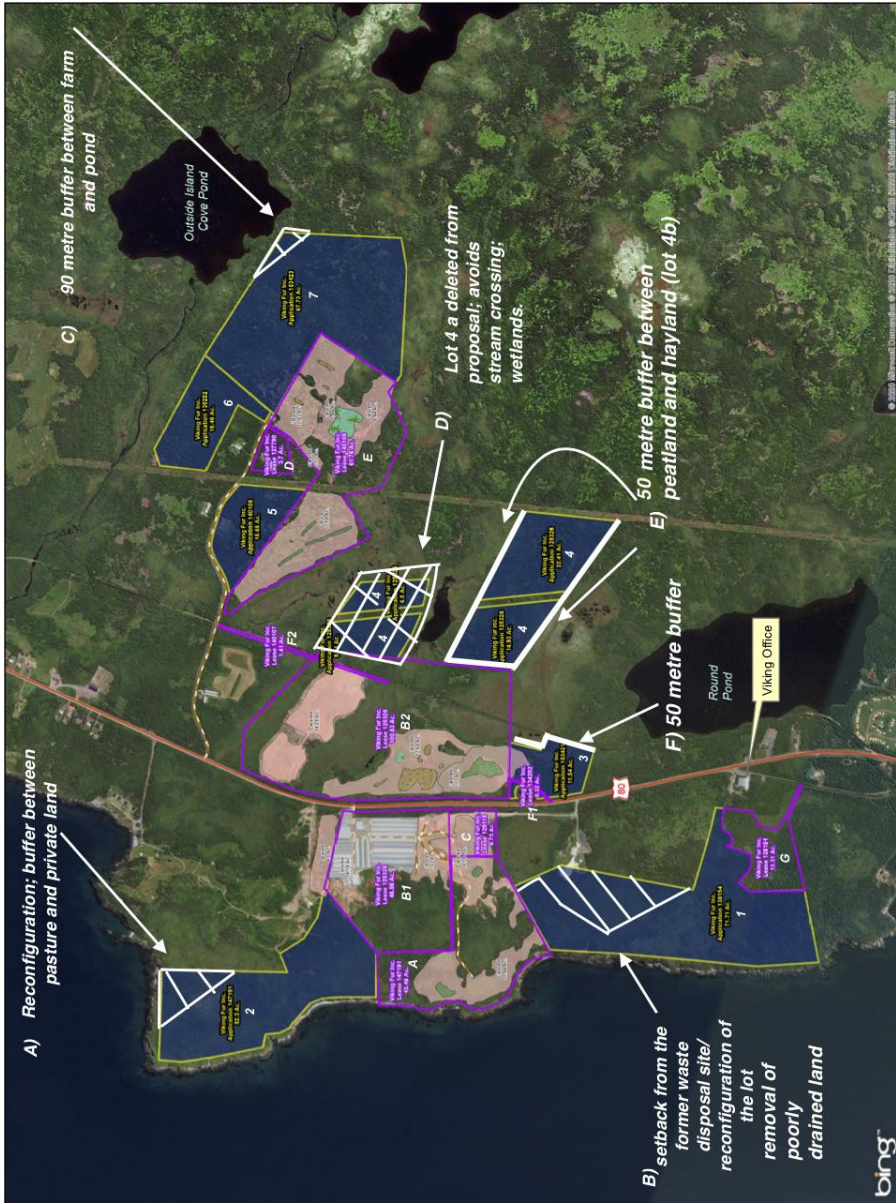
**Adjusted lots:
 buffers and
 deletions**
 Approximate locations
 Adjusted, December 2021,
 Viking Fur farm Inc.

Area Conversion: 1 Ha = 2.47 Ac

Designed for Illustrative Purposes Only



1:12,500



Schedule of Farmland Development

Table 1

Parcel of land (lease)	Total acres	Suitable acres	Cutover/removal of vegetation	Stone removal and levelling	Cultivation/seed ing
Parcel 1	56	33	2022/25	2023/25	2023/25 (pasture)
Parcel 5	17	13	2022/2023	2023	2023/24 hayland
Parcel 3	12	6	2022	2023	2023 hayland
Parcel 7	68	54	2023/24	2024/26	2025-27 hayland
Parcel 2	44	18	2024/2025	2025/26	2024/27 pasture
Parcel 6	19	11	2027	2027	2027 hayland
Parcel 4	37	25	2026/2027	2026/27	2027 hayland
Parcel Z	~ 20	20	2023	2023	2023 pasture/hayland

3.0 REGULATORY REQUIREMENTS

There are a variety of environmental approvals, permits, guidelines and authorizations which are required for farmland development and agricultural operations, including the maintenance of a beef herd. Viking and those employees responsible for ‘permitting’, must obtain all such authorizations and provide proof of acquisition to the Department of Environment and Climate before the development may proceed. Table 2 is a list of permits, regulatory approvals, requirements and guidelines; many of which directly apply to this project.

Table 2

Regulatory Framework and Government Oversight

- 1) *Environmental Protection Act/Environmental Assessment Regulations*: Approval is required for the proposed project to proceed. Environmental Assessment Division, Department of Environment and Climate Change. As stated in the Minister’s release of the Cavendish Beef Farm from further Environmental Assessment, Viking must

- prepare an Odour Control Management Plan, Environmental Protection Plan and an Environmental Effects Monitoring Plan.
- 2) *Environmental Protection Act*. An Environmental Certificate of Approval, prepared by Service NL and released by the Agrifoods Development Branch, Department of Fisheries, Forestry and Agriculture is required for the Cattle Farm. Viking has a Certificate of Approval (C of A) for 15,000 breeding female mink (100 animal units) C of A# is; A-WMS11-024-2010OF issued in April 2020. A new certificate is required in April 2023. It is anticipated the beef component of the farm will be referenced in the amended Certificate of Approval.
 - 3) *Water Resources Act*. Permits for altering a body of water. (includes culverts, watering holes and bridges) Water use authorization, Water Resources Division, Department of Environment and Climate Change.
 - 4) *Environmental Protection Act*: Used Oil and Used Glycol Regulations; Storage and Handling of Gasoline and Associated Products Regulations; Heating Oil Storage Tank Regulations. Pollution Prevention Division, Department of Environment and Climate Change.
 - 5) *Public Health Act*; Health and Sanitation Regulations; Development near drinking water wells and water supplies. Department of Digital Government and Service NL.
 - 6) *Urban and Rural Planning Act*. Protected Roads Zoning Regulations, Department of Municipal and Provincial Affairs.
 - 7) *Crown Lands Act*; Permit to Occupy Crown Land
 - 8) *Forestry Act*. Forestry Branch, Department of Fisheries, Forestry and Agriculture. Lessees of Crown Land leases are not required to obtain a cutting permit, provided the timber is not offered for sale or barter. Permits required for burning of brush related to farmland development.
 - 9) *Federal Fisheries Act*: The Department of Fisheries and Oceans will investigate activities in water bodies which negatively impact fish habitat, such as erosion/sedimentation.
 - 10) *Occupational Health and Safety Act*. and Regulations. All activities, including contractors must be done in accordance with the *Act* and associated Regulations. Department of Digital Government and Service NL
 - 11) *Canadian Migratory Convention Act*. Bird Act; Species at Risk Act. Federal legislation to protect migratory birds and species at risk. Federal Department of Environment and Climate Change.
 - 12) *Endangered Species Act*. Provincial legislation to protect the Province's natural heritage. Wildlife Division, Department of Fisheries, Forestry and Agriculture.
 - 13) *Animal Health and Protection Act*. Animal Protection Standards Regulations, Fur Farming Regulations. The Department of Fisheries, Forestry and Agriculture. Viking holds a Fur Farm Operation License (19-003) issued pursuant to the *Act*.
 - 14) Provincial (NL)Environmental Guidelines for Livestock Operations
 - 15) National Code of Practice for the Care and Handling of Beef Cattle
 - 16) The Code of Practice for the Care and Handling of Mink

4.0 GENERAL ENVIRONMENTAL PROTECTION MEASURES

4.1 BUFFER ZONES

4.1.1 Aquatic Environment (Waterbodies and wetlands)

Potential Environmental Concerns

Agricultural activities modify the natural ecosystem which may negatively impact water quality. The potential agricultural effects on aquatic ecosystems include:

- Sediments carried into water by soil erosion
- Nutrients from manure and synthetic fertilizers draining into the water
- Pesticides carried into the water
- Clearing of trees and shrubs from shoreline
- Land clearing; construct drainage ditches, straightening natural water channels

The entry of manure into water courses can increase ammonia levels which can negatively harm fish. In addition, bacteria from the manure consume oxygen which can cause fish to suffocate.

Environmental Protection Procedures

Viking will not develop organic wetlands (peatland) and has taken a precautionary approach of maintaining buffer zones of natural vegetation adjacent to all water bodies at widths which exceed Government requirements. Map 1 illustrates the location and width of buffers, including the deletion of parcel 4a due to its proximity to a brook. Viking will not use pesticides during the development or operation of the farm.

4.1.2 Avifauna Environment

Potential Environmental Concerns

Raptor nesting sites could be impacted by noise (or direct loss of nesting sites) from land clearing. Land clearing activities could also be disruptive during the sensitive nesting period for migratory birds from April 15th to August 15th.

Environmental Protection Procedures

Viking will not clear vegetation within 800 metres of a bald eagle or osprey nest during the nesting season and 200 metres for the rest of the year. A 200-metre buffer would also be applied to other raptor nests. (e.g., Northern Goshawk, Sharp shinned hawk, Merlin, American Kestrel, Great-Horned Owl, Boreal Owl and the Northern Saw-whet Owl.)

Viking will encourage domestic wood harvesters to cut and remove trees outside of the sensitive nesting period of mid -April to mid-August which coincides with traditional cutting practices.

Viking will inform the Provincial Department of Wildlife of the referenced raptor nests and bird species the farm seldom observes, in the event such species are rare/threatened.

4.1.3 Land Clearing and Farm Development Environment

Potential Environmental Concerns

The potential concerns of removing vegetation, such as trees and shrubs, include the loss of habitat, impact on water quality and wildlife disturbance. The use of heavy equipment, including fueling could contaminate water if there was a spill.

Environmental Protection Procedures

The following procedures shall be implemented with respect to land clearing and farm land development:

- a) Viking will consult with the Provincial Department responsible for Forestry (Forestry Branch) to determine a wood harvesting plan which will identify areas of merchantable wood before land clearing proceeds.
- b) Sites slated for clearing shall be inspected prior to clearing and monitored during and after the work is completed as described in the Environmental Effects Monitoring Plan (EEMP)
- c) The boundaries, including buffer zones around wetlands and water courses will be well marked prior to clearing.
- d) Merchantable wood will be removed as required by the Forestry Branch. The cutting and removal of wood, primarily for domestic use, will be done by residents with the approval of Viking as stated in written permission provided to the residents.
- e) Cleared land will be levelled, rock picked, limed, fertilized and seeded in the same year to minimized the amount of time topsoil is exposed.
- f) Fueling of heavy equipment will be done outside of buffers zones and at least 150 metres from a water course.
- g) Farmland development associated with this project will not require the construction of bridges. Culverts may be needed to allow access over ditches along access roads and will be placed in respect to the requirements of the Water Resources Branch, Provincial Environment.
- h) If moose became agitated and /or were considered a nuisance, land development would cease; Provincial wildlife officials would be contacted to determine appropriate means to respond to the conflict.

4.1.4 Farmland Operations Environment

Potential Environmental Concerns

The spreading of liquid manure could contaminate water courses. The transfer of manure could result in a spill if there was an accident between the farm and field destinations. The use of pesticides could impact fish and invertebrate populations in water courses. The erosion of farm fields can result in the sedimentation of watercourses. The odour impacts of manure spreading will be discussed in the Odour Control Management Plan.

Environmental Protection Procedures

The maintenance of naturally vegetated buffers will minimize the risk of liquid manures entering water courses. Between the farm and the fields there is one bridge and approximately 100 metres of road within 50 metres of a watercourse. Consequently, the risk of a spill into a watercourse, directly or overland flow is minimal. If there was a spill, Viking would respond as per its environmental contingency plan. (Section 5)

Viking will not use pesticides on the fields.

The combination of buffers and permanent sod cover (grass forage/pasture) on farm fields will minimize the likelihood of erosion and the subsequent sedimentation of water courses.

Most moose/agriculture conflicts in the Province are related to vegetable farms. The farm will not produce vegetables; hence it is not anticipated there will be conflicts with moose.

4.1.5 Beef Operations Environment

Potential Environmental Concerns

Access by cattle to water course areas may result in erosion and sedimentation of the water course. Higher nutrient levels in the watercourses from cattle manure could also reduce water quality.

Escaped cattle could damage property and cause safety concerns. Nuisance populations of flies have been associated with intensive cattle operations.

Environmental Protection Procedures

Cattle will be pastured on the ocean side of the highway and therefore will not have access to permanent water watercourses. Watercourses on the ocean side of the highway are limited to seasonally intermittent streams which flow towards the ocean.

The cattle will be controlled with fencing which will be inspected in early spring, mid-summer and late fall. (pasture fields will be visited every two weeks) Reports of escaped cattle will be responded to immediately.

NB. Farm operations in respect to odour will be addressed within the Odour Control management Plan.

4.1.6 Flies

Potential Environmental Concerns

An accumulation of moist organic material, such as manure can provide an environment suitable for fly habitat. Combined with warm summer weather, flies may become a nuisance to nearby communities.

Environmental Protection Procedures

The proposed cattle farm is based on year-round, low density pasture which will not result in an accumulation of manure in anyone area. In the winter, Viking will rotate the locations where feed is placed to minimize the opportunity for an accumulation of manure. Experience on regional pastures and beef farms in NL have not revealed concerns of flies related to cattle pasture. Research, by a Memorial University Graduate student on Cavendish/Viking fields concluded the spreading of liquid mink manure would not result in a breeding site or an attraction to the lesser house fly.

SECTION 5; ENVIRONMENTAL EMERGENCY CONTINGENCY PLAN (EECP)

Policy Statement

Viking is committed to operating in a fashion which will minimize the likelihood of an environmental emergency while identifying and preparing to respond to an environmental event.

Viking is committed to:

- The health and safety of employees and the public
- The protection of the environment
- In the event of an environmental event (spill), the company's priorities are as follows:
 - Safety of employees at the site and members of the community
 - Protection of the environment
- Peter Noer, President or Eric Dalsager Vice President will lead the response to the event. In their absence, the Supervisor responsible for general farm operations will be in charge. The authority vested in the supervisor to respond to an emergency, including

the expenditures, is confirmed through Viking's Environmental Emergency Contingency Plan.

- Viking will plan and test the company's response to an environmental emergency.
- The effectiveness of the response will be discussed and recorded with recommendations for improvements and include a date for the next test.
- Management is responsible for media and public consultations. In their absence the authority will be vested to a designated employee of the company.

5.1 Purpose and Scope of the EEC

The EEC is to identify potential hazards, develop systems to prevent hazards, provide appropriate mechanisms for minimizing risk, loss and environmental damage. A plan must provide a management structure to guide a response and to ensure there is an evaluation of the response with the aim of improving the response in anticipation of an event.

The identification of possible environmental emergencies:

Liquid Manure spill

- In the barns e.g., gutter break down/overflow
- Overflow at the SWEA separator
- Spill while filling the manure tanker/spreader
- Damage to the tanker enroute to fields or while spreading manure on fields.

Fuel spill

- Damage to equipment or during refueling
- Farm equipment during general farm operations. (equipment damage or while refueling, accident causing a leak)

Feed related spills.

- from delivery truck to refrigeration

Loss of electrical power

- Feed production and water for the animals

High ammonia levels

- Barns; Manure Storage

5.2 Risk Analysis

a) *Manure spill.* Manure is removed from the barns (via the gutters) every one to three days, hence a breakdown of the gutter system would be identified before the gutters overflowed. Viking has the equipment and knowledge to repair the gutters before overflow. Risk is considered low from a health or environmental perspective. If there was a spill from a gutter, the manure would be scraped up and the barn pressure washed. The effluent would be collected and applied to the fields.

An overflow of dry manure at the separator would be removed with a farm tractor and spread on fields or added to the compost pile; both of which are located close by. (within 100 metres) The separator is located close to the farm buildings which allows the system to be closely monitored. Whereas the manure is dry, a spill would be easy to contain and remove. Therefore, the environmental risk is considered low.

Failure at a manure storage tank causing a spill would require cleanup with farm equipment and hay as an absorbent. The system is manually operated, hence if there was a spill it would be detected immediately which would facilitate containment of the manure. The storage tanks include a system to prevent siphoning of the manure from the tanks. Risk of a significant spill is concluded to be low.

Filling the manure tanker is done and monitored by an employee. If there was a spill, the filling would be stopped to minimize spillage. Any surface accumulation would be collected and spread on a field. Risk of a significant spill is considered to be low.

The manure tanker carries about 10,000 litres of manure from the storage tanks to the fields where the tanker spreads the manure. The tanker accesses the fields via Fox Farm Road, less than half a kilometre of driving on Route 80. The tanker travels up to three kilometres to spread manure on fields, including Fox Farm road, the former railway and resource access roads, including of farm roads.

The closest water course is the tributary of Brook Cove Brook which drains from Highland and Sooleys marshes through a culvert under Fox Farm Road. A portion of the tributary flows adjacent to the former rail line for about 100 metres. The former rail line is now used as an access road to lots B2 and proposed lot 4b.

An accidental spill next to the brook or to drainage towards the brook, particularly during a time of saturated ground conditions represents the worst-case scenario of a spill. Whereas there is no transfer of manure between farm equipment, the risk of a spill is low and if did happen, there is a significant buffer between the fields and the water courses. Whereas the tanker travels at low speed and the referenced resource roads are straight, with minimum slope, the chance of a spill is considered low, however a spill response must be considered and established.

b) *Fuel spill.* During land clearing and farm development, heavy equipment would be refuelled where the development is taking place. If the entire fuel capacity of a piece of equipment was spilled, the amount could be as much as 300 litres. A spill in excess of 70 litres shall be reported to the Department of Digital Government and Service NL. Viking will abate the leak and cleanup the site to the satisfaction of Government. Any spillage into a watercourse shall be reported to the 'spill line,' (722-2083) During normal farm operations, farm equipment will be refuelled on the existing farm where the fuel storage is located on a concrete pad. In the case of a spill, the concrete pad would facilitate cleanup and prevent percolation into the ground.

c) *Feed Spill* Feed related spills are unlikely, however if they do occur, they are limited to individual truck deliveries of solid materials which could be scraped up off the paved surface by readily available farm equipment. Due to the ability to respond quickly and that there is an impervious surface, the risk of contamination from a spill is considered low.

d) *Loss of Power* The loss of power with potential impact on all aspects of the farm including water for the animals. As a result, the farm has generators for back-up power which substantially reduces the risk to the health of the animals. The feed storage does not have back up power, however the storages are well insulated and the raw products for the feed would remain frozen for a few days.

e) *Ammonia* The farm shall assess ammonia levels in barns and in vicinity of the manure storages according to the requirements of the Occupational Health and Safety Division. Adequate ventilation has been effective in maintaining levels within acceptable ranges; hence the risk is considered low.

5.3 Emergency Response

Viking's environmental emergency response plan depends on the level of emergency.

Level 1: minor spills requiring an on-site worker to respond and take necessary corrective actions. This level of spill would be easily contained and cleaned up by the on-site worker, who would report the incident and response to his/her immediate supervisor or Peter Noer/ Eric Dalsager.

Level 2: intermediate spill requiring a response by on-site staff or off-site staff, but posing no danger to the public or contamination to a water course. The appropriate response and mitigation of the project would be confirmed by management, including the determination of the need for off-farm assistance to mitigate the results of the incident.

Level 3: A major incident such as direct or possible contamination of a water course or wetland which is beyond the ability of the farm (on or off-site staff) to completely remediate. The spillage of petroleum products of greater than 70 litres is considered a level 3 incident. The identification of the scope of the incident, immediate actions and planning for further and on-going actions shall be prepared and communicated by the Peter Noer, Eric Dalsager or to the person to whom they have delegated to lead/coordinate the response to the incident to the relevant Government agency

As per Viking's Environmental Certificate of Approval, (Certificate) Section 42 the following incidents shall be reported. (Service NL (934-3112)

- a) Non-conformance of any condition within the Certificate
- b) Spillage or leakage of a regulated substance, e.g. petroleum products;

- c) Whenever discharge criteria is, or is suspected to be exceeded; or
- d) Verbal/written complaint of an environmental nature from the public is received.

The conditions of the Certificate also require a written report including a detailed description of the incident, summary of contributing factors and an action plan to prevent future incidents of a similar nature shall be submitted to the Regional Director. (Service NL) The action plan shall include a description of actions already taken and future actions to be implemented and shall be submitted within 30 days of the date of the initial incident.

5.4 Response Action, Containment and Cleanup

The following checklist would be used following the determination of an incident:

- Identify the nature/extent of the of the incident and the potential of escalation; are their health/safety or environmental threats?
- Inform Viking management.
- Report the incident to: 1-800-563-2444; 722-2083
- Mobilize the appropriate resources and personnel to contain the 'spill' or to identify off farm personnel/equipment to respond to the incident
- Obtain remediation/containment materials from the storage barn;
 - Petroleum products spill kit including absorbent pads and booms
 - Hay bales to contain petroleum or liquid manure spills
 - Identify equipment and contact personnel for the clean-up.
- Determine the need for off farm expertise and/or equipment to clean-up a spill. E.g., vacuum truck services
- Prepare estimates of the spill and possible implications, such as water/soil contamination and odour releases.
- Determine disposal methods and storage of contaminated materials.

The degree of restoration and remediation for level 2 or 3 events would usually be determined through consultation between the farm and Service NL and/or the Federal Department of Fisheries and Oceans and the Department of Environment and Climate Change. The reporting of the incident as explained above would alert the applicable departments and agencies.

Restoration of manure and petroleum products is expected to start with the physical removal of the substance. Liquid manure, if pooled and accessible would be absorbed by hay and placed in an area greater than 50 metres, assuming the slope of the land can be described as gentle, from a water course. Petroleum products and contaminated soil would be contained and removed to an acceptable disposal site.

5.5 Post Incident Evaluation

The evaluation of Viking's response to an incident (level 3) will include the following:

- Suitability of the organization structure, equipment and communication
- Adequacy of: training, communication, spill containment, procedures and monitoring

A written report shall include:

- General description of the incident
- Source and cause of the incident
- Description of the response
- Quantity/percent of spill recovered
- Cleanup costs
- Recommendations for preventative and mitigative measures
- Plans for upgrading incident response preparedness and response plans.

5.6 Training and Practice Drills

Viking recognizes competency is vital in operating Viking's business, including its response to environmental incidents. Comprehensive training is imperative so staff understand their roles and duties in responding to a 'spill.' Initial training must be followed up with on-going training as a reminder and to ensure new staff are capable to respond to the type of incident for which they have been trained to address.

Practice drills will help develop employee skills and evaluate Viking's ability to respond to a mock exercise. The drills will evaluate the following:

- Practicality of the response plan
- Adequacy of communications
- Equipment effectiveness
- Overall development of skills and confidence to respond to an environmental incident quickly and efficiently

CONTACT LIST

Department	Telephone
Canadian Coast Guard Emergency Emergencies (Spill line)	(709) 772-2083 1-800-563-9089
Provincial Forestry and Wildlife Whitbourne Office After Hours Emergency	(709) 579-2712 (709) 685-7273
Fisheries and Oceans Canada	(709) 330-7963
Service NL, Occupational Health and Safety 24-Hour Accident Reporting Line	(709) 729-3275 1-800-729-4444
NL Department of Environment and Climate Change Water Resources Division	 709 729-2563
NL Department of Environment and Climate Change Pollution Prevention Division	 709- 729-2556
RCMP	(709) 759-2600

6.0 ENVIRONMENTAL MONITORING

See: Environmental Effects Monitoring Plan

7.0 SIGNATURE PAGE

Viking Fur Farm Inc.
Environmental Protection Plan

Viking Fur Farm Inc.

Name/Position (printed)

Signature

Date: _____

Viking Fur Inc.

Name/Position (printed)

Date: _____

Name of Manager or Supervisor

Date: _____

Manager or Supervisor Signature

Date

8.0 SPILL REPORT FORM

Date and time the spill was discovered.

Time Reported to Management; and the applicable Government Agency.

 ;

Contacts:

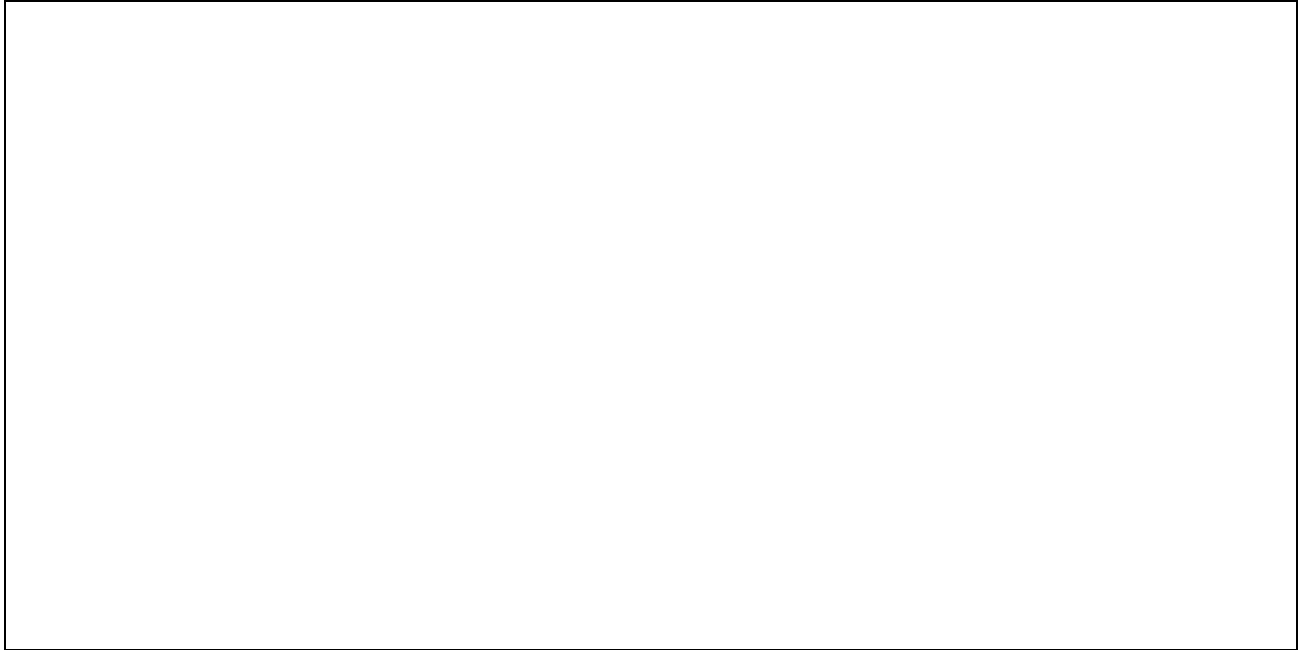
 ;

Description, including type and source of spill.

Location and description of the spill.

Distance to nearest, buildings, roads, fields. (Explain type)

Distance to nearest stream/water body, bog.



Sketch of site along with approximate distances and arrows to depict slopes and direction of flow. Include, buildings, roads, water courses etc.

Description of cause and any impacts of the spill.

Actions taken to clean up the spill, including collection and disposal.

Remaining clean-up requirements. (if applicable)

Additional Comments.

Completed by and date: _____