

# **Appendix 26-A**

## **Commitments Table**



**PROJECT NUJIO'QONIK**  
**Environmental Impact Statement**



**PROJECT NUJIO'QONIK**  
**Environmental Impact Statement**  
**Appendix 26-A Commitments Table**  
August 2023

ID #	Mitigation Type	Commitment Description
1	Mitigation	Existing riparian vegetation will be maintained according to buffer specifications in permits and regulations.
2	Mitigation	Work will be performed so that materials such as sediment, fuel or other hazardous materials do not enter watercourses and waterbodies through implementation of erosion and sediment control measures and hazardous materials management practices.
3	Mitigation	Work will be conducted in a manner to protect watercourses and wetlands from siltation and disturbance in accordance with Best Management Practices or as otherwise agreed upon with the regulator.
4	Mitigation	Sensitive areas (e.g., wetlands, rare plant occurrences, hibernacula, mineral licks, roosts) identified prior to Project activities will be flagged and appropriate buffers maintained around these areas, where feasible.
5	Mitigation	Clearing for temporary road construction will be limited to the width required for road embankment, drainage requirements, and safe line of sight requirements. Trees will be cut close to ground level, and only large tree stumps will be removed, where practicable. Low ground shrubs will be left in place for soil stability and erosion protection purposes, where possible.
6	Mitigation	Where crossing of wetlands beyond the area to be cleared is unavoidable, protective layers such as matting or biodegradable geotextile and clay ramps, or other approved materials, will be used between wetland root / seed bed and construction equipment if ground conditions are encountered that create potential for rutting, admixing or compaction.
7	Mitigation	Grading will be directed away from wetlands, where possible, and will be reduced within wetland boundaries unless required for site specific purposes.
8	Mitigation	Project staff and contractors will adhere to the waste management procedures to be included in the EPP and the Waste Management Plan.
9	Mitigation	Construction areas will be kept clear of rubbish and debris. Rubbish and debris will be appropriately stored and managed.
10	Mitigation	Waste materials and debris will be collected and stored in acceptable containers on-site and disposed of off-site in an environmentally acceptable and approved site. Materials that can be recycled will be sorted and taken to an approved facility.
11	Mitigation	Volatile wastes and materials, such as fuel, mineral spirits, oil, or paint thinner will be stored appropriately and will not be permitted to enter into waterways or storm drains. They will be disposed of at an approved site.
12	Mitigation	Where portable toilets are required, waste will be removed from the site by the supplier in a timely manner for appropriate disposal. These toilets will be located more than 30 m from the boundaries of wetlands or watercourses.
13	Mitigation	Burning of rubbish and waste materials on-site will not be permitted. Rubbish and waste materials will not be buried on-site.
14	Mitigation	Bulk fuel and lubricants will be stored in secure areas (i.e., with bund walls and impervious flooring) that have the capacity to trap more than the volume of petroleum hydrocarbons being stored; this will serve as a secondary containment should the primary containment fail. Other petroleum hydrocarbon products will not be stored in large quantities on-site, and secondary containment (e.g., drip trays) will be used in areas of storage and transfer.



**PROJECT NUJIO'QONIK**  
**Environmental Impact Statement**  
**Appendix 26-A Commitments Table**  
August 2023

<b>ID #</b>	<b>Mitigation Type</b>	<b>Commitment Description</b>
15	Mitigation	Hazardous products will be stored according to industrial requirements and standards, and safely secured so that access is limited to authorized personnel.
16	Mitigation	Fuelling and servicing will be conducted using appropriate containment equipment, including spill kits.
17	Mitigation	Fuelling and servicing areas will be sited more than 100 m away from watercourses, coastlines, waterbodies, and wetlands.
18	Mitigation	The potential for spills will be reduced through the use of standard good practices, such as the use of appropriate containers, and avoiding overfilling.
19	Mitigation	Vehicles, heavy equipment, and machinery will be properly maintained to reduce the risk of leakage. Routine preventative maintenance and inspection of hydraulic equipment and machinery will be undertaken to avoid a hazardous material release.
20	Mitigation	Project footprint and disturbed areas will be limited to the extent practicable.
21	Mitigation	The limits for approved clearing, grubbing and topsoil overburden removal will be clearly identified (flagging/survey stakes) in the field prior to the commencement of work.
22	Mitigation	Project vehicles, heavy equipment, machinery, and associated exhaust systems and mufflers (and/or other appropriate sound attenuation devices) will be regularly inspected and maintained so that they remain operating in accordance with manufacturer's recommendations.
23	Mitigation	Project vehicles, heavy equipment, and machinery will be shut down when stationary for long periods of time. The idling of vehicles and equipment will be avoided whenever practical.
24	Mitigation	Dust from Project activities will be controlled where required by using applications of water or other approved agents. Waste oil will not be used for dust controls.
25	Mitigation	Project-related fugitive road dust will be controlled through measures such as: - Establishing appropriate speed limits on Project-controlled gravel roads - Conducting road watering on an as-needed basis - Requiring trucks hauling material that can generate dust to have tarps to cover the load
26	Mitigation	Re-seeding of areas will follow standard methods in compliance with permit conditions. These methods will be included the Project EPP.
27	Mitigation	Specific stockpiles of topsoil, overburden, and other potentially dust-generating materials will be kept covered, where practical, and used as soon as practical, or will be appropriately temporarily vegetated.
28	Mitigation	Nearby residents will be notified prior to blasting.
29	Mitigation	Project vehicles will drive within the speed limit to reduce engine noises as vehicles travel on roadways within adjacent communities, and horns will be used only as necessary for safety purposes.
30	Mitigation	Explosives storage and production facilities, if required, will meet government regulations, including required separation distances as regulated by the Explosives Regulatory Division of Natural Resources Canada. Explosives and accessories will be stored at the planned Natural Resources Canada approved magazine site and/or approved/developed explosive storage methods.



**PROJECT NUJIO'QONIK**  
**Environmental Impact Statement**  
**Appendix 26-A Commitments Table**  
August 2023

ID #	Mitigation Type	Commitment Description
31	Mitigation	Blasting activities (if required) will be included under a contract service agreement with the explosives supplier and who will have a valid blasters certificate issued by the NLDECC.
32	Mitigation	An Explosives and Blasting Management Plan will be developed by the blasting contractor to provide direction for the safe storage, handling and use of explosives and explosive components at the Project site, to address the safety of the public and Project personnel, and protection of both the environment and Project components.
33	Mitigation	Areas to be cleared will have sediment and erosion control measures implemented per the site-specific Erosion & Sediment Control Plan prior to the initiation of clearing activities. The sediment and erosion control measures will be adapted to suit the field conditions associated with the specific construction activities as construction proceeds.
34	Mitigation	Construction areas will be routinely monitored to identify areas of potential erosion and to apply appropriate mitigation. Best practice erosion and sediment control measures will be implemented, as required.
35	Design	The drainage system for the site will be designed to appropriately manage stormflows considering impacts to on-site downstream watercourses, and coastlines, and infrastructure. Additionally, the site drainage system will consider the variable and seasonal up-stream drainage needs to provide adequate access to downstream watercourses without adverse impact on the plant site or other nearby infrastructure.
36	Mitigation	In the event that project activities occur in any designated water supply areas, the work will be completed in conjunction with the jurisdiction having authority.
37	Mitigation	For work during the nesting season, pre-clearing surveys will be conducted for active migratory bird nests and buffer / set-back distances from active nests will be established.
38	Mitigation	The discovery of nests by staff will be reported to the Environmental Advisor at site and appropriate action or follow-up will be guided by the Project EPP.
39	Mitigation	Environmental personnel responsible for site monitoring during construction will receive training to recognize SAR / SOCC that may be present in Project Area.
40	Mitigation	WEGH2 will work with Wildlife Division to manage interactions with identified sensitive areas.
41	Mitigation	Artificial lighting will be limited to the amount required for safety and security purposes, and will be directional, or otherwise designed, to reduce spill-over light, wherever feasible, without compromising site safety or security. Lights will be side-shielded and directed downward to reduce the attraction of birds, where possible.
42	Mitigation	Native plants will be used for landscaping, where practical.
43	Mitigation	To reduce the risk of introducing or spreading exotic and/or invasive vascular plant species, equipment will arrive at the construction site clean and free of soil and vegetative debris. Equipment will be inspected by Project personnel or designate and either approved for use or cleaned, re-inspected and approved for use.
44	Mitigation	To avoid attracting wildlife, wastes will be securely stored, frequently removed from site, and properly disposed of in an environmentally acceptable manner at an approved site.



**PROJECT NUJIO'QONIK**  
**Environmental Impact Statement**  
**Appendix 26-A Commitments Table**  
August 2023

ID #	Mitigation Type	Commitment Description
45	Mitigation	Known occurrences of plant SAR / SOCC will be avoided through micro-siting of Project infrastructure, when practicable. If avoidance of plant SAR / SOCC is not possible, seed collection or transplant of the plant will be considered in consultation with the applicable regulators.
46	Mitigation	If complaints are received from land users regarding perceived Project-related impacts, WEGH2 will work with the affected land users to address their concerns through a grievance redress mechanism and the potential implementation of additional mitigation measures as needed.
47	Mitigation	Workforce training will be provided to address topics such as WEGH2's Equity, Diversion and Inclusion (EDI) Policy and health and safety policies.
48	Mitigation	Management of employees and the temporary accommodations camp will consider measures to reduce impacts on the local community and local infrastructure through provision of services on site, and bussing.
49	Engagement	A Gender Equity and Diversity Plan will be implemented that meets the approval of the Minister of Industry, Energy and Technology and Minister Responsible for the Status of Women, and WEGH2 will engage with Indigenous groups during the development of the Plan. A business access strategy for members of underrepresented populations will be included in the plan.
50	Mitigation	WEGH2 will communicate employment information to local communities and Indigenous groups in a timely manner so that local and Indigenous residents have an opportunity to acquire the necessary skills to qualify for potential Project-related employment.
51	Mitigation	WEGH2 will work with the province, educational and training institutions, Indigenous groups and stakeholders to identify skilled trade shortages relative to the Project, and to identify training needs and opportunities to contribute to a sustainable Project workforce.
52	Engagement	WEGH2 will engage with local resource users regarding the overlap of the Project with land use areas in the Project Area. This will include the communication of Project information, updates on ongoing and planned activities, a discussion of issues and concerns, and a potential means of addressing them.
53	Mitigation	Project activities, locations, and timing will continue to be communicated to Indigenous groups, members of the public and government throughout the life of the Project. In particular, and as part of a Traffic Management Plan, WEGH2 will communicate in advance with respect to Project activities that may limit / affect use of access roads (i.e., upgrading activities or transport of large loads or equipment). This information will be communicated through local town councils, local radio stations and social media, as applicable.
54	Mitigation	Project personnel will conduct daily occupational health and safety meetings.
55	Mitigation	Occupational health and safety plans will be developed and approved, detailing appropriate operating procedures and safety provisions based on the type of machinery and materials being used, and contractors will be required to operate in compliance with these plans.
56	Mitigation	The Project will be compliant with the legal, statutory, and regulatory occupation health and safety and labour requirements, to safeguard community and worker safety and health.
57	Mitigation	Personnel will be required to use protective gear to guard against on-the-job injuries.



**PROJECT NUJIO'QONIK**  
**Environmental Impact Statement**  
**Appendix 26-A Commitments Table**  
August 2023

<b>ID #</b>	<b>Mitigation Type</b>	<b>Commitment Description</b>
58	Mitigation	Only trained and/or certified persons will use specialized equipment and handle dangerous chemicals.
59	Mitigation	Hazardous products will be stored according to industrial requirements and standards, and safely secured so that access is limited to authorized personnel.
60	Mitigation	WEGH2's Emergency Response Plan will describe emergency response measures, training requirements, roles and responsibilities, and contact and reporting procedures in the event of a fire at, or near, the Project Area.
61	Mitigation	Traffic management measures will be put in place and consistently implemented to control on-site traffic, as well as the practices of drivers to and from construction sites. Emergency vehicle access will be maintained.
62	Mitigation	There will be adequate safety and security measures to prevent unauthorized entry into restricted Project areas.
63	Mitigation	Adequate safety signage, fencing, guardrails, and/or warning tape will be installed to indicate restricted Project areas to deter members of the public, and sufficient security will be in place to monitor and enforce these restrictions.
64	Mitigation	Safety warning signs will be strategically placed near construction works to inform the public of prohibited activities.
65	Mitigation	Project drivers will be cautioned to obey the speed limit and other traffic laws.
70	Mitigation	Waste generated on-site will be removed on a regular basis and disposed of appropriately at an approved facility.
71	Mitigation	A hazardous waste inventory will be developed to support the management of general and hazardous operational waste streams.
72	Mitigation	Turbine lighting levels will be at, or above, the minimum allowed by Transport Canada for aeronautical safety, and white or red strobe lights may be used with the minimum intensity and flashes per minute allowable.
73	Mitigation	A post-construction wildlife mortality monitoring program will be established, and carcass searches will be conducted at the turbines between April and October. Surveys will be designed to account for searcher efficiency and scavenger rates. The mortality monitoring program will be developed in consultation with the Government of NL Wildlife Division and the CWS.
74	Mitigation	An adaptive management framework will be used to introduce new mitigation measures if high fatality rates are observed. Mitigation measures such as an increase in cut-in speeds, or other effective mitigation measures from operational wind power projects, will be considered.
76	Mitigation	When operational, the Project will meet applicable national and provincial standards to protect the health and safety of workers and the surrounding communities. In addition to addressing the potential effects of noise, air quality, worker health and safety, and public health and safety, a grievance redress mechanism will be developed to allow the best interests of relevant stakeholders to be considered during the Project.
77	Mitigation	Best practices for the proper handling, storage, and disposal of spilled hazardous chemicals and fuels will be included in the EPP and implemented by the Project personnel and contractors.
78	Mitigation	WEGH2 will liaise with local emergency providers so that roles and responsibilities are understood, and that the necessary resources required to respond to accidents and emergencies are in place.



**PROJECT NUJIO'QONIK**  
**Environmental Impact Statement**  
**Appendix 26-A Commitments Table**  
August 2023

<b>ID #</b>	<b>Mitigation Type</b>	<b>Commitment Description</b>
79	Mitigation	Mandatory safety orientations will be provided for employees.
80	Mitigation	Emergency response plans will be developed, including spill prevention and response, emergency response measures, training, responsibilities, clean-up equipment and materials, and contact and reporting procedures.
81	Mitigation	Appropriate Project personnel will be trained in fuel handling, equipment maintenance, and fire prevention and response measures.
82	Design	Fire prevention and suppression systems will be maintained on site and will consider proper suppression systems for the various potential ignition sources.
83	Mitigation	Spill response kits will be available on-site. Project vehicles will be equipped with appropriately sized spill kits.
84	Mitigation	In the event of a spill, dry clean up and mopping techniques will be used, as appropriate. The area will not be “washed down” as this could cause the spills to spread to the surrounding environment and potentially enter drainage works or environmentally sensitive areas.
85	Mitigation	Soil that may have become contaminated will be remediated. This may be done on-site or removed from site for disposal at an approved location.
86	Design	The potential effects of extreme weather, including storms, precipitation, and drought will be considered in Project planning, design, and operation and maintenance strategies, including the selection of materials and equipment, and design of components. These designs will consider projected climate change conditions over the life of the Project.
87	Mitigation	WEGH2 will regularly inspect and monitor Project infrastructure and equipment that may be impacted by the environment (in addition to its normal function) and take required action to maintain, repair, and upgrade infrastructure / equipment as needed.
88	Design	Work activities will include allowance / procedures for delays due to poor weather.
89	Mitigation	Contingency plans, including emergency back-up power for necessary operations, will be in place to manage delays, such as temporary power outages.
90	Mitigation	Weather forecasts (including marine forecasts) will be considered when planning construction and operation activities that may be affected by adverse conditions, such as receipt of materials and supplies, and product deliveries, particularly deliveries of products and diesel fuel. Where required, these activities will be scheduled for periods of favourable weather conditions.
91	Mitigation	Barge anchors will be moved only when necessary to reduce the resuspension of sediments.
92	Mitigation	Construction vessels and barges will use designated routes to and from the construction site.
93	Mitigation	WEGH2 will maintain up-to-date communication with fishers on Project activities and Project vessel operators, facilitated through a community liaison representative.
94	Mitigation	Navigational Warnings and Notices to Shipping will be issued.
95	Mitigation	Movement of vessels will be subject to the Practices and Procedures for Public Harbours under the <i>Marine Act</i> .





**PROJECT NUJIO'QONIK**  
**Environmental Impact Statement**  
**Appendix 26-A Commitments Table**  
August 2023

ID #	Mitigation Type	Commitment Description
96	Mitigation	Vessels will use Pilots within compulsory pilotage area
97	Mitigation	All marine-based work undertaken by registered vessels will comply with the requirements of the <i>Canada Shipping Act</i> .
98	Mitigation	All marine-based work undertaken by foreign vessels must be undertaken pursuant to a Coasting Trade Permit issued under the <i>Coasting Trade Act</i> , and will comply with applicable regulations under the International Maritime Organization Conventions including the International Convention for the Prevention of Pollution from Ships (MARPOL).
99	Mitigation	All marine Project activities will be conducted in accordance with the requirements of the Canadian Coast Guard Marine Communication and Traffic Services (CCG-MCTS).
100	Mitigation	Consultation with local fish harvesters and other stakeholders will be undertaken regarding marine-related activities that may interact with fisheries.
101	Mitigation	Vessel maintenance, inspection and certifications will be required prior to mobilization. WEGH2 will require supportive evidence by a third-party vetting process.
102	Mitigation	Marine vessels operated by the Project or Contractors will be required to have trained and qualified personnel in accordance with Canadian Marine Personnel Regulations, the <i>Marine Occupational Health and Safety Act</i> , or an equivalent IMO-approved program.
103	Design	Project components will be designed to reduce the area of disturbance to the extent feasible.
104	Design	Subsea cables will be buried to reduce risk of species mortality and disturbance in the nearshore marine environment at both landfall sites.
105	Design	Fill material for the rock berms will be reasonably free of fines, debris and substances that would be deleterious to the marine environment.
106	Mitigation	All marine activities will comply with the conditions of Letter of Advice and authorization issued by DFO.
107	Mitigation	The use of ship's whistles will be reduced to the extent possible, and only used in compliance with the International Collision Regulations and standard operating procedures.
108	Mitigation	Project vessels will comply with applicable legislation, codes and standards of practice for shipping, including the Ballast Water Regulations under the <i>Canada Shipping Act</i> and the Guide to Canada's Ballast Water Regulations, to reduce risk of introduction of marine-invasive species.
109	Mitigation	Water quality monitoring will be conducted for total suspended solids (TSS) prior to, and during, dredging, as required by applicable permits and authorizations.
110	Mitigation	Vessels and equipment to be used during construction will be operated and maintained according to manufacturer's specifications with supervision and inspections being undertaken throughout the construction phase.
111	Mitigation	Routine effluents and operational discharges produced by marine vessels (e.g., grey and black water, bilge water, deck drainage, discharges from machinery, and non-hazardous waste material) will be managed in accordance with MARPOL and IMO guidelines, of which Canada has incorporated provisions under various sections of the <i>Canada Shipping Act</i> .



**PROJECT NUJIO'QONIK**  
**Environmental Impact Statement**  
**Appendix 26-A Commitments Table**  
August 2023

<b>ID #</b>	<b>Mitigation Type</b>	<b>Commitment Description</b>
112	Mitigation	Ammonium nitrate-fuel oil mixtures for blasting will not be used in, or near, water due to the potential for production of toxic by-products.
113	Mitigation	Prior to dredging, the Contractor will test the sediments in the dredge area for contaminants, and compare the results against relevant guidelines for the intended fate of the material (e.g., reuse for fill and/or land reclamation, and/or disposal at sea of surplus material) to determine if it is safe for industrial land use, commercial land use, parkland/residential land use, and/or for disposal at sea of surplus material (if required).
114	Mitigation	For disposal at sea of surplus dredge material that is coarse sediment (e.g., rubble and coral rock), the location for the creation of artificial reefs will be determined by regulators and in consultation with fishers.
115	Mitigation	Awareness training will be provided to Project-dedicated marine personnel to identify signs of marine mammals and sea turtles at the sea surface. Project-dedicated vessel masters will be instructed to avoid marine mammals and sea turtles while in transit, and reduce speed or deviate from course if safe to do so, in order to reduce probability of collisions/vessel strikes. For example, to comply with measures within the Cabot Strait voluntary slowdown zone.
116	Mitigation	Lighting on Project vessels will be directed to the operational areas rather than sea surface where safe to do so, so as not to attract avifauna.
117	Mitigation	Lights will be directed away from observed turtle nesting areas.
118	Mitigation	Lighting on vessels will adhere to maritime safety regulations / standards.
119	Mitigation	Stranded/injured/deceased birds found on board the Project vessels will be documented by the vessel and reported to CWS.
120	Mitigation	Project vessels will be equipped with communication mechanisms to communicate with third-party mariners.
121	Mitigation	If construction activities must be scheduled during commercial fishing seasons and be conducted in the fishing grounds, WEGH2 will continue to manage and reduce adverse conflicts with affected fishers.
122	Mitigation	The cable installation contractor will issue regular "Security Messages" stating the vessel is restricted in ability to maneuver, course, speed and intentions. This will also be issued prior to the vessel arriving through the Notice to Mariners.
123	Design	ACSR conductors will be sized and spaced accordingly in a way that reduces corona effect to the extent possible.
124	Design	Proposed design will be submitted to Navigation Canada for evaluation and approval, where warning lights on the 230kV structures along the transmission path may be required.
125	Design	Transmission line configurations, designed to limit overall height, will be used where practicable.
126	Mitigation	Routine effluents and operational discharges produced by cable-laying and support vessels (e.g., grey and black water, bilge water, deck drainage, discharges from machinery, and non-hazardous waste material) will be managed in accordance with MARPOL and IMO guidelines, of which Canada has incorporated provisions under various sections of the <i>Canada Shipping Act</i> .
128	Mitigation	Ploughing or jetting will be employed as the primary method of cable burial during Project construction.



**PROJECT NUJIO'QONIK**  
**Environmental Impact Statement**  
**Appendix 26-A Commitments Table**  
August 2023

ID #	Mitigation Type	Commitment Description
129	Mitigation	Following completion of cable deployment, the cable will only be extracted if necessary for cable repairs, thereby reducing potential effects on the marine environment related to cable removal and reburial.
130	Mitigation	Proper cable placement will mitigate potential underwater vibration caused by strumming. Cable pay-out tension will be regulated during construction to reduce suspensions between rocks. Post-lay inspection will be carried out to confirm that cable has been correctly deployed either on or into the seabed. In addition, modern cables have been designed to improve their protection against fish biting (Carter et al. 2009).
131	Mitigation	The cable will be de-activated and left in place indefinitely when no longer in use. This end-of-life option will avoid additional seabed disturbance and has, therefore, been selected rather than removal, which would require pulling up the cable along the entire route (including buried and unburied portions), and cause unwarranted disruption to the seabed, sediments, and benthic communities.
132	Design	The Project will be designed and constructed to meet applicable engineering codes, standards and best management practices (e.g., such as the National Building Code of Canada, and the Canadian Standards Association Guide to Canadian Wind Turbine Codes and Standards, National Fire Code of Canada). The codes and standards account for safety features that address hazards from power outages, sudden system upset/disruption and weather variables, including extreme conditions, that could affect the structural integrity of buildings and infrastructure. Designs will also consider projected climate change over the life of the Project. For example, the National Building Code of Canada contains design requirements to account for extreme weather on infrastructure such as: (1) Critical structures and steel selection to prevent brittle fracture at low ambient temperatures; (2) Electrical grounding structures for lightning protection; (3) Maximum motor ambient temperature; and (4) Ice and freeze protection
133	Mitigation	To mitigate risk to public as a result of ice shedding, warning signs will be installed to indicate the potential risk of ice shedding around the wind turbines. Operational staff will be made aware of the risks of ice shedding and associated safety protocols and procedures, and should be directed to take appropriate action when the weather conditions are likely to lead to ice accumulation on the wind turbine blades. Staff will require personal protection equipment to be worn near the wind turbines.
134	Mitigation	Weather forecasts (including marine forecasts) will be regularly monitored and, prior to extreme weather events, appropriate preventative measures will be taken to reduce the risk of damage to the Project. This will include site inspection by staff to secure loose items and identify other risks (for wind events), and inspection / maintenance of sediment and erosion control measures prior to, and following, precipitation events.
135	Mitigation	The Project will be designed and constructed to meet applicable engineering codes, standards, and best management practices, including the National Building Code of Canada, which provides standards of safety to account for geological hazards, including seismic activity in accordance with the applicable requirements.
136	Mitigation	Site-specific erosion and sedimentation control plans will be developed during detailed design phase of the Project and will be implemented.



**PROJECT NUJIO'QONIK**  
**Environmental Impact Statement**  
**Appendix 26-A Commitments Table**  
August 2023

ID #	Mitigation Type	Commitment Description
137	Mitigation	To address the risk of slope instability, a detailed terrain mapping assessment, including ground-truthing, for the final Project Area will be completed to identify both construction constraints and geohazards that may impact the Project. Slope stability assessments will be completed as part of the design, particularly at locations where there is proposed re-grading and glacio-fluvial deposits that are susceptible to erosion and undermining as seen in Stephenville.
138	Mitigation	To address the risk of subsidence a detailed terrain mapping assessment using LiDAR from the Project Area to assess for karst formation that may be present will be completed.
139	Mitigation	To address the risk of landslide/rock fall a detailed terrain mapping assessment will be used to identify historical landslides and rock fall activity within the Project Area. Identification of naturally occurring past events may necessitate further investigation or avoidance. For human-made rock cuts, or largescale re-grading of rock slopes, geotechnical investigation and design will be conducted so that the final cuts / grading are stable and will not cause potential instability during construction or long term.
140	Mitigation	WEGH2 will actively monitor wildfires that could affect the wind turbines, substations, supporting transmission infrastructure, and/or access roads and coordinate with provincial authorities with respect to response, including the need for potential shutdown and evacuation of employees.
141	Mitigation	On-site fire prevention and response equipment will be provided and maintained, and WEGH2 will have employees / teams that will be trained in safe fire response. While the purpose of this response training and equipment is to respond to Project-related fire scenarios, NLDFFA would be responsible for response to a forest fire in the area not related to the Project.
142	Mitigation	Proper fire breaks will be considered and cleared, where necessary, during clearing and site layout.
143	Mitigation	Project-related activities will be adjusted in case of a severe fire and as needed to protect the health and safety of employees.
144	Mitigation	Approval from NLDECC will be obtained to establish the required concrete batch plants at each Site. Plant operations will comply with the conditions outlined in the approvals and requirements under air pollution control regulations.
145	Mitigation	The Environmental Code of Practice for Concrete Batch Plant and Rock Washing Operations, 1992 will be adhered to during concrete production activities.
146	Mitigation	Washwater from the cleaning of mixers, mixer trucks and concrete delivery systems will be handled using the procedures outlined in Section 3.0 of the Environmental Code of Practice for Concrete Batch Plant and Rock Washing Operations.
147	Mitigation	Rinsing activities will be carried out at the site of the concrete batch plant, except rinsing of the chute and applicable concrete placement equipment.
148	Mitigation	Wildlife surveillance will be conducted prior to, and post, noise elevated activities. Activities may be delayed until wildlife have been allowed to leave the area as directed by the OSEM.
149	Mitigation	Blasting patterns and procedures will be used to reduce shock or instantaneous peak noise levels, in accordance with a Blast Management Plan that will be developed for the Project.



**PROJECT NUJIO'QONIK**  
**Environmental Impact Statement**  
**Appendix 26-A Commitments Table**  
August 2023

ID #	Mitigation Type	Commitment Description
150	Mitigation	Explosives will be used in a manner that will reduce damage or defacement of landscape features, trees, ecologically sensitive areas such as wetlands, and other surrounding objects, by controlling through standard best practice (including precisely calculated explosive loads and adequate stemming), the scatter of blasted material beyond the limits of activity. Outside of cleared areas, inadvertently damaged trees will be cut, removed, and salvaged, if merchantable (refer to Section, "Clearing of Vegetation"). Fly rock, which inadvertently enters a waterbody, watercourse, or ecologically sensitive area and that can be recovered without further damage to the environment, will be removed. Instances where larger fly rocks (boulders) enter these areas or deep waterbodies, recovery of this will be discussed with the OSEM.
151	Mitigation	Time delay blasting cycles or blasting mats will be used, if necessary, to control the scatter of blasted material.
152	Mitigation	Blasting will not occur in the vicinity of fuel storage facilities.
153	Mitigation	Blasters will have a Blasters' Safety Certificate from the NL Department of Labour. This certificate and a Temporary Magazine License will be obtained prior to drilling and blasting.
154	Mitigation	Use of explosives will be restricted to authorized Personnel who have been trained in their use.
155	Mitigation	There will be separate magazines on-site for explosives and for dynamite blasting caps. All temporary magazines for explosive storage will have appropriate approvals.
156	Mitigation	Blasting associated debris, such as explosive boxes and used blasting wire, must be collected for proper disposal as soon as possible following blasting activity.
157	Mitigation	Waste rock that is suitable for usage at the site will be set aside for subsequent use. Waste rock not suitable for site use will be deposited in the designated stockpile area.
158	Mitigation	Previous testing on selected samples of bedrock has shown the samples to be Non-Potentially Acid Generating (NPAG). As a precautionary measure, the OSEM will inspect all areas of blasted rock and rock stockpiles so no evidence of PAG material exists.
159	Design	Proposed ecological reserves on the Port au Port Peninsula and Codroy area will be avoided to the extent possible.
160	Mitigation	WEGH2 will enter into a Mutual Use and Mutual Access Agreement with local snowmobile trail association to allow continued snowmobile / ATV use of the Port au Port and Codroy area wind farm sites.
161	Mitigation	Movement of equipment / vehicles will be restricted to defined work areas and roads, and specified corridors between work areas.
162	Mitigation	Machinery will be operated above the high-water mark or inside of isolated areas.
163	Mitigation	In-water work will be planned to respect DFO timing windows to protect fish in Newfoundland and Labrador (DFO 2019), as required through a letters of advice, <i>Fisheries Act</i> authorizations, or in consultation with DFO.
164	Mitigation	The duration of instream works will be reduced to the extent possible.



**PROJECT NUJIO'QONIK**  
**Environmental Impact Statement**  
**Appendix 26-A Commitments Table**  
August 2023

ID #	Mitigation Type	Commitment Description
165	Mitigation	In-water worksites will be isolated from flowing water (i.e., by using a cofferdam) to contain or reduce suspended sediment, where possible. Clean, low permeability material and rockfill will be used to construct cofferdams, as required.
166	Mitigation	New culverts will be sized appropriately and designed to be passable to fish to maintain fish passage.
167	Mitigation	New culverts will be embedded to a minimum of 20% with appropriately sized substrates, or arch culverts will be installed.
168	Mitigation	Use of explosives in, or near, water will be avoided, however, if required, will follow DFO blasting guidelines.
169	Mitigation	Siting of Project infrastructure will be designed to avoid fish habitat to the extent practicable.
170	Mitigation	Fish screens will be installed and maintained to prevent fish from entering water intakes.
172	Mitigation	If fording is required, it will follow the DFO temporary ford code of practice (DFO 2020).
173	Mitigation	Best efforts will be made by a qualified environmental professional to relocate fish from areas of in-water works to an appropriate location in the same watershed.
174	Mitigation	Site and access roads will be maintained in good condition. This will include periodically regrading and ditching to improve water flow, reduce erosion, and to manage vegetation growth.
175	Mitigation	Herbicide application will be prohibited within watercourse buffers.
176	Mitigation	A minimum ecological flow will be maintained in watercourses and waterbodies where water is diverted during construction or extracted during commissioning and operation.
178	Mitigation	Project footprint and disturbed areas will be limited to the extent practicable.
179	Mitigation	Clearing and disturbance will be limited to defined rights-of-way and associated access routes.
180	Mitigation	Merchantable timber will be salvaged and used, or it will be made available to local communities for fuelwood, in accordance with any agreed-upon arrangements.
181	Mitigation	Signage will be installed around the turbine sites to alert the public and land users of the presence of the Project and its facilities.
182	Mitigation	Construction activities which have the potential to generate noise and vibration in built-up areas, will be conducted during the hours allowed in the relevant permits and or regulation.
183	Mitigation	Project personnel will not be permitted to hunt / fish / harvest while staying at the workforce accommodation camp(s) and/or performing work on the Project and will not be permitted to bring firearms or angling gear to the workforce accommodation camp(s).
184	Mitigation	Canadian Standard Association stream crossing clearance guidelines will be adhered to for the construction, operation and maintenance of the transmission lines.



**PROJECT NUJIO'QONIK**  
**Environmental Impact Statement**  
**Appendix 26-A Commitments Table**  
August 2023

ID #	Mitigation Type	Commitment Description
185	Mitigation	Where applicable, provisions of the <i>Canadian Navigable Waters Act</i> related to the "Minor Works Order" for classes of work related to Aerial Cables – Power and Telecommunication will be adhered to. WEGH2 will submit the locations of transmission line crossings for review to Transport Canada to determine the effects on navigation.
186	Engagement	WEGH2 will continue to engage with local resource users (i.e., hunters, outfitters, trappers, anglers) regarding the overlap of the Project with hunting, trapping, and fishing areas in the Project Area. This will include the communication of Project information, updates on ongoing and planned activities, a discussion of issues and concerns, and a potential means of addressing them.
187	Mitigation	WEGH2 will work with mining/quarry operators to determine if blasting mats, or other mitigation measures, are required during quarry operations adjacent to the ROW.
188	Mitigation	WEGH2 will consult with NLDDFA in advance of construction to incorporate the harvesting of forestry resources in the Project Area as part of site preparation.
189	Mitigation	WEGH2 will provide compensation to the Crown for the removal of timber and associated effects on productive forestland, if required.
190	Mitigation	Locations of domestic wood harvesting blocks will be identified in the EPP for the Project to limit damage from construction activities (e.g., errant construction equipment).
191	Mitigation	Existing access roads, trails or cut lines will be used to the extent possible. Permission to use existing resource roads will be obtained, where applicable.
192	Mitigation	Construction activities and equipment will be managed to avoid damage and disturbance to adjacent properties, structures, and operations.
193	Mitigation	Project activities, locations, and timing will continue to be communicated to affected land and resource users, the provincial government, and local authorities throughout the life of the Project.
194	Mitigation	Desired land and resource end-uses will be considered in the preparation of the Decommissioning and Rehabilitation Plan.
195	Mitigation	WEGH2 will Implement a winter operating protocol as part of an Ice Throw Management Plan to reduce wind turbine ice throw hazards.
196	Mitigation	Project activities in or near watercourses / waterbodies will be conducted in accordance with applicable requirements under the <i>Fisheries Act</i> , the <i>Canadian Navigable Waters Act</i> , and associated regulations.
197	Engagement	WEGH2 will consult with Policy, Planning, and Natural Areas Division (ECC) and Wildlife Division (FFA) in development of an Environmental Effects Mitigation and Monitoring Plan.
198	Mitigation	WEGH2 will site Project components so as to avoid or reduce Project-related construction activities within the portions of the Project Area that overlap the existing T'Railway Provincial Park corridor and the proposed Bras Mort Bog Ecological Reserve.
199	Mitigation	A Traffic Management Plan will be developed to address the access road network, traffic accommodation plans and logistics.
200	Engagement	WEGH2 will enter into a common use agreement with local stakeholders to allow for mutual use of land once construction of the turbines is completed.



**PROJECT NUJIO'QONIK**  
**Environmental Impact Statement**  
**Appendix 26-A Commitments Table**  
August 2023

ID #	Mitigation Type	Commitment Description
201	Mitigation	For the protection of public safety, public access to portions of the Project Area related to the temporary workforce accommodation camp(s), the Port au Port wind farm and associated infrastructure, the Codroy wind farm and associated infrastructure, the 230 kV transmission lines and substations, the hydrogen / ammonia plant, and the port facilities will be restricted as required while site preparation and construction activities are carried out within those particular areas. During operation, there will be safety-related restrictions to areas such as transformer stations, ammonia plant and the port facilities.
202	Mitigation	During decommissioning, access restrictions will not occur throughout the entire Project Area simultaneously and will, instead, be limited to those segments of the Project Area in which decommissioning and rehabilitation is actively underway.
203	Mitigation	Necessary authorizations will be sought under the CNWA, where applicable, based on final Project design and detailed navigation assessments.
204	Engagement	A Domestic Woodcutting Consultation Plan will be developed to address domestic user concerns with the Project and to identify potential mitigation measures in consultation with NLDFFA.
205	Mitigation	Outfitter Effects Monitoring Program will be implemented to address effects on outfitter operators and their clients.
206	Engagement	Where project activities have the potential to directly affect property owners within the LAA, WEGH2 will continue to engage them, as required.
207	Engagement	WEGH2 will engage with the NLDIET, including the Geoscience division, and local resource stakeholders on associated effects on mineral and petroleum leases, mineral exploration and potential applicable mitigation measures.
208	Mitigation	Where there are known mineral occurrences within the Project Area, WEGH2 will consider siting Project components so as to limit interactions within areas of overlap.
209	Mitigation	Efforts will be made, where practicable, to avoid or reduce the loss of vegetation in key harvesting areas through the micro-siting of Project components during detailed design.
211	Mitigation	If feasible, anchors and mooring cables will be placed in areas of lower ecological importance.
212	Mitigation	Tenders will be used to lift anchors rather than dragging them across the seabed.
213	Mitigation	Designated or directional anchoring will be implemented.
214	Mitigation	The subsea cable route will be selected to avoid sensitive marine habitats, to the extent possible.
215	Mitigation	Route length of the subsea cable will be reduced to the extent possible.
216	Mitigation	Displaced material will be backfilled to reduce the potential for sediment remobilization.
219	Mitigation	Cable burial depth will be monitored for safety and damage prevention.
220	Mitigation	Obstructions will be removed before installation along the cable route.
221	Mitigation	If pile driving is required during construction, use of quieting technologies will be considered to reduce noise (e.g., bubble curtains, vibratory pile drivers, isolation casings, cofferdams, or hydro sound dampers).





**PROJECT NUJIO'QONIK**  
**Environmental Impact Statement**  
**Appendix 26-A Commitments Table**  
August 2023

ID #	Mitigation Type	Commitment Description
223	Mitigation	Trained observers will be used to maintain an exclusion area around pile driving activities for certain species. Pile driving activities must be shut down and delayed if a marine mammal or sea turtle is observed entering or within the relevant exclusion zones.
224	Mitigation	A gradual ramp up of hammer energy for impact pile driving will be implemented. The initial set of strikes will be followed by a waiting period and this process will be repeated several times prior to the initiation of pile driving.
225		Vessel traffic will be kept to a minimum during construction and decommissioning, minimizing changes in vessel traffic where at-risk species are likely to occur.
226	Mitigation	Vessels will follow and maintain a mandatory distance from species at risk.
228	Mitigation	Safety exclusion zones will be established during construction, maintenance, and decommissioning activities.
229	Mitigation	Infrastructure and obstructions for each Project phase will be charted and shared with affected stakeholders and regulators.
230	Mitigation	Guard vessels will be used, and shipping will be monitored when exclusion zones are in place.
231	Engagement	Coordination with local municipalities will be implemented to reduce impacts on popular events in the area (e.g., recreational fishing tournaments).
232	Engagement	The timing and location of construction and vessel movements will be communicated with affected recreation / tourism parties.
233	Mitigation	Pre-installation surveys will be conducted to confirm modelled habitat maps and mapped areas where substrate biological communities are unknown.
236	Mitigation	Lighting will be designed using recommended minimum lighting levels provided by the Illuminating Engineering Society (IES) of North America's IES Lighting Handbook for outdoor worksite lighting, and in consideration of the CIE criteria, or other standards acceptable to the minister, as required by the NL Occupational Health and Safety Regulations.
238	Mitigation	Noise mitigation measures, such as enclosures, louvres, and insulation, will be used in the hydrogen / ammonia plant in order to meet regulated sound levels at receptors.
239	Mitigation	Outdoor process piping will be wrapped in insulation to reduce piping noise.
240	Mitigation	Tree clearing will be completed in accordance with permit conditions, including any timing windows/restrictions.
241	Mitigation	A Species at Risk Impact Mitigation and Monitoring Plan will be developed for the Project, which will include mitigation and monitoring for SAR bats.
250	Engagement	Develop a Species at Risk Impacts Mitigation and Monitoring Plan (SAR IMMP) in consultation with NLDFFA post-EA release and prior to the issuance of an Economic Activity Permit. The SAR IMMP will include mitigation, monitoring, and adaptive management frameworks for possible impacts on SAR risk including, but not limited to, plants, bats and provincially managed bird species such as raptors. The Plan will be updated when species that occur within the Project footprint are designated and listed after the Project approval dates, or if currently listed species move into the Project Area.



**PROJECT NUJIO'QONIK**  
**Environmental Impact Statement**  
**Appendix 26-A Commitments Table**  
August 2023

ID #	Mitigation Type	Commitment Description
251	Mitigation	Observations of bat colonies, potential hibernacula sites, and sick or dead bats will be reported to the provincial Wildlife Division at 709-637-2025 or email <a href="mailto:endangeredspecies@gov.nl.ca">endangeredspecies@gov.nl.ca</a> . Bat sightings can also be reported to the toll-free bat hotline the Province has partnered with: 1-833-434-2287 (BATS).
252	Mitigation	The SAR IMMP will include information about hoary bat ( <i>Lasiurus cinereus</i> ), silver-haired bat ( <i>Lasionycteris noctivagans</i> ), and Eastern red bat ( <i>Lasiurus borealis</i> ), particularly given their known susceptibility to mortality at wind turbines. Mitigation in the IMMP may include locking or feathering the turbine blades below the standard cut-in speed during the bat active season from May 1 to October 31.
253	Mitigation	If there is observed mortality of NL ESA-listed bat species (currently little brown myotis [ <i>Myotis lucifugus</i> ] and northern myotis [ <i>M. septentrionalis</i> ]) during operation and maintenance activities, any relevant procedures prescribed by permit conditions will be followed.
265	Mitigation	An Avifauna Management Plan will be developed and implemented for the Project, and will include such measures as conducting pre-clearing surveys for active migratory bird nests during the breeding bird season, and buffer / set-back distances from active nests.
267	Mitigation	For work encroaching on an Areas of Conservation Concern, trees that provide actual or potential habitat will be retained where practicable. Removal activities, where required, will be scheduled in accordance with regulations and permit conditions, including adherence to timing restrictions, if applicable.
272	Mitigation	A Gender Equity and Diversity Plan will be implemented that meets the approval of the Minister of Industry, Energy and Technology and the Minister responsible for the Office of Women and Gender Equality. WEGH2 will engage with Indigenous groups during the development of the Plan. A business access strategy for members of underrepresented populations will be included in the plan.
273	Mitigation	A Benefits Agreement will be implemented that meets the approval of the Minister of Industry, Energy and Technology, and Minister Responsible for the Office of Women and Gender Equality.
274	Engagement	WEGH2 will communicate employment information to local communities and Indigenous groups in a timely manner so that local and Indigenous residents have an opportunity to acquire the necessary skills to qualify for potential Project-related employment.
275	Engagement	WEGH2 will work with the Province, educational and training institutions, Indigenous groups, and stakeholders to identify skilled trade shortages relative to the Project, and to identify training needs and opportunities to contribute to a sustainable Project workforce.
276	Engagement	On-the-job training programs and apprenticeship opportunities will be made available.
277	Engagement	Summary reports will be provided to the provincial regulator that include information on the number of persons employed by 4-digit National Occupational Classification (NOC), the number of full- and part-time employed, the number of apprentices (by level) and journey persons for each applicable 4-digit NOC code, gender and source of the workforce.
278	Mitigation	Procurement packages will be developed with consideration for capacity and capabilities of local and regional Indigenous and non-Indigenous businesses.



**PROJECT NUJIO'QONIK**  
**Environmental Impact Statement**  
**Appendix 26-A Commitments Table**  
August 2023

ID #	Mitigation Type	Commitment Description
279	Mitigation	Project purchasing requirements will be posted in a timely manner so that local and regional businesses can position themselves to compete to supply goods and services needed for Project construction, operations and decommissioning.
280	Mitigation	Will hire locally trained personnel to operate and maintain the wind farms, to the extent possible.
281	Mitigation	Temporary accommodations camps will be constructed to house workers during Project construction, and decommissioning and rehabilitation.
282	Mitigation	A Community Vibrancy Fund of \$10 million for the construction phase of the Project will be distributed equally to the three Project areas (Stephenville, Port au Port and Codroy). The fund will be paid over three years, commencing with the construction start in each area.
286	Engagement	Collaborate with CNA through the application/acceptance process to provide scholarships/bursaries to students in the Wind Turbine Technician and Hydrogen Technician programs. Following regulatory approval and final investment decision (FID), WEGH2 intends to make hiring commitments to some students in these programs.
288	Mitigation	Prioritizing transport on Project access roads versus public roads (e.g., maximizing use of purpose-built Project roads on the Port au Port Peninsula)
290	Mitigation	Potential use of marine landing sites on the Port au Port Peninsula to reduce impacts on local roads.
291	Mitigation	Potential hauling at night, where appropriate.
292	Engagement	Advance public notice and posting of transport schedules, as appropriate.
293	Mitigation	Potential for convoying components for delivery to the Codroy wind farm.
294	Mitigation	Scheduling of daytime deliveries to avoid peak traffic, when possible.
295	Mitigation	Escort vehicles will be used to indicate delivery travel to the traveling public or other motorists. Scheduling of deliveries, in an effort to minimize conflict with ferry traffic between Stephenville and Port aux Basques, will be implemented to the extent practicable.
296	Mitigation	WEGH2 has prepared a Waste Management Plan (WMP) that describes the liquid and solid waste expected to be generated during construction, operation and maintenance, decommissioning, and rehabilitation for all components of the Project. The WMP also includes methods to reduce, reuse, recycle, recover, and/or manage residual wastes through disposal.
297	Mitigation	WEGH2 has prepared a Workforce and Employment Plan, in consultation with the Department of Immigration, Population Growth and Skills, and with the Office of Women and Gender Equality, for the construction, operation and maintenance, decommissioning and rehabilitation phases of the Project. This Plan outlines: positions required (including National Occupation Classification codes); timelines for employment; estimates of apprentices and journeypersons required; qualifications, certifications and other requirements (including training); anticipated source of the workforce; a commitment to provide quarterly summary reports; and a commitment to develop a Benefits Plan.



**PROJECT NUJIO'QONIK**  
**Environmental Impact Statement**  
**Appendix 26-A Commitments Table**  
August 2023

ID #	Mitigation Type	Commitment Description
298	Mitigation	WEGH2 is committed to making a reasonable effort to hire locally, to the extent possible, and is currently undertaking studies on employment availability to analyze local labour capacity for the Project. WEGH2 will be able to better determine how many of these jobs can be filled using local labour from these analyses and studies. WEGH2 intends for jobs created for the Project to be held by locals, except in cases that capacity and available skillsets present limitations. Working closely with industry partners, trade groups, and local post-secondary education institutions will allow the Project to source qualified candidates locally.
300	Mitigation	Planned avoidance of known heritage and cultural resource sites (and their 50 m setbacks) by Project-related ground disturbance and land-clearing construction activities will be undertaken.
301	Mitigation	Measures to be undertaken with approval and appropriate permits issued by the PAO: If avoidance of areas of 'Medium' or 'High' archaeological potential is not possible, then a field assessment will be undertaken to re-evaluate these areas for heritage and cultural resource potential.
302	Mitigation	Measures to be undertaken with approval and appropriate permits issued by the PAO: Should the field assessment determine that the heritage and cultural resource potential of any of the identified areas remains enhanced, then additional mitigation (i.e., judgmental shovel testing) will be conducted
303	Mitigation	Measures to be undertaken with approval and appropriate permits issued by the PAO: If avoidance is not possible, specifically for areas of 'Known' heritage and cultural resource potential (i.e., registered historic resource sites), then additional mitigation, in consultation with the PAO, will be conducted which could include aerial excavation and documentation of the known resources.
304	Mitigation	Measures to be undertaken with approval and appropriate permits issued by the PAO: With regard to the two options being considered for the 230 kV cable route crossing at the Port au Port isthmus, should the proponent decide on the subsea cable route across East Bay (Port au Port Bay), a marine-based field assessment will be undertaken.
305	Mitigation	Measures to be included in the Environmental Protection Plan's Heritage and Cultural Resources Protection Plan: Prior to construction, personnel will be made aware of potential heritage and cultural resources in the area, and understand their responsibility should they identify potential heritage resources.
306	Mitigation	Measures to be included in the Environmental Protection Plan's Heritage and Cultural Resources Protection Plan: Personnel will be advised to report findings potentially related to heritage resources to the Site Supervisor and avoid touching or moving such findings.
307	Mitigation	Measures to be included in the Environmental Protection Plan's Heritage and Cultural Resources Protection Plan: Should a potential heritage and cultural resource be identified during construction, work will be suspended in the immediate area.



**PROJECT NUJIO'QONIK**  
**Environmental Impact Statement**  
**Appendix 26-A Commitments Table**  
August 2023

ID #	Mitigation Type	Commitment Description
308	Mitigation	Measures to be included in the Environmental Protection Plan's Heritage and Cultural Resources Protection Plan: The area of findings will be flagged to protect it from further disturbance or looting .
309	Mitigation	Measures to be included in the Environmental Protection Plan's Heritage and Cultural Resources Protection Plan: A qualified archaeologist or historic resources professional will be contacted by the Site Supervisor to conduct an assessment of the site, determine if the findings are heritage resources, and make recommendations for the mitigation measures in consultation with the PAO and WEGH2, and Indigenous communities, as applicable.
310	Mitigation	Continuous monitoring of surface water levels in Mine Pond to maintain ecological maintenance flows downstream of the Project site
311	Mitigation	Access roads will be maintained in good condition. This will include periodically regrading and ditching to improve water flow, reduce erosion, and manage vegetation growth.
313		Existing drainage patterns will be maintained, to the extent feasible, with the use of culverts and bridges.
314	Mitigation	Biodiesel will be used instead of diesel fuel, where possible.
315	Mitigation	Non-contact water will be diverted away from development areas, where possible. Channels and berms will be constructed, as needed, to divert natural precipitation and surface runoff away from contact with exposed earth.
316	Mitigation	Effluent will be treated prior to discharge to the receiving environment, as required, to meet regulatory effluent criteria as outlined in the Assimilative Capacity Assessment (Appendix 11-A)
318	Mitigation	Environmental personnel responsible for site monitoring during construction will receive training to recognize Great Blue Heron nests that are protected year-round on Schedule 1 of the Migratory Bird Regulations, 2022
319	Mitigation	When possible, flashing lights will be used as opposed to fixed lighting, while adhering to Transport Canada's requirements.
320	Mitigation	WEGH2 will establish sufficient setback of wind turbines to mitigate risk to surrounding residences.
321	Mitigation	Travel through wetlands for inspection or maintenance activities will be limited, when possible. Non-invasive methods (e.g., drones) will be used when possible.
322	Mitigation	If field surveys identify concentrations of vegetation SAR that may be unavoidable with micro-siting and could result in a threat to the persistence of a vegetation SAR within the RAA, a plan will be developed in consultation with NLDFFA-WD with the intent of monitoring and mitigation potential adverse effects.
323	Mitigation	Clean aggregate material will be used for temporary road access near sensitive wetland and vegetation areas, including wetlands, to reduce the likelihood of introducing or spreading exotic and/or invasive plant species.



**PROJECT NUJIO'QONIK**  
**Environmental Impact Statement**  
**Appendix 26-A Commitments Table**  
August 2023

ID #	Mitigation Type	Commitment Description
324	Mitigation	WEGH2 will develop, in consultation with NLDFFA-WD, a plan to reduce the potential spread of New York aster along roadways constructed or upgraded for the Project. This plan may incorporate multiple methods to reduce the spread of New York aster, including, but not limited to, lining road ditches with riprap, inspecting roadways and roadside ditches, and spot herbiciding observed locations of New York aster.
325	Mitigation	The locations of wetlands will be considered when designing water management plans and systems.
327	Mitigation	During decommissioning and rehabilitation, topography of areas that were wetland prior to Project construction will be returned to near pre-Project conditions, to facilitate the reestablishment of wetland habitat.
328	Mitigation	Water from dewatering activities will be discharged through a geotextile filter bag or equivalent. If the filter bag is overwhelmed by sediment or quantity of water, a sediment removal basin will be constructed, which may consist of a temporary enclosure constructed with straw bales, geotextile fabric or both.
329	Mitigation	Maintain minimum 16 m setback from temporary workforce camp septic system and supply well from other groundwater users, including the temporary workforce accommodations' potable supply well.
330	Mitigation	WEGH2 will conduct annual inspections of the septic system to monitor septic system functionality.
331	Mitigation	Septic system best management practices to be observed (e.g., harsh cleaners, paint, solvents not to be disposed of in accommodation camp drains).
332	Mitigation	Continuous monitoring of surface water levels in Mine Pond to observe effects on adjacent groundwater levels, if present.
333	Mitigation	Where nighttime construction work is conducted, lighting used will be in compliance with regulations and permit conditions issued for the Project.
334	Mitigation	Hunting will be strictly prohibited at the Project site. Workers will not be permitted to hunt while staying at the accommodations camp and will not be permitted to bring firearms to site.
335	Mitigation	The on-site environmental team will be notified if caribou are observed within the Project Area. If caribou are in proximity of Project infrastructure or activities, the environmental team will investigate and determine a course of action to be taken to limit interaction and/or sensory disturbance with the animal(s) as described in the Impact Mitigation and Monitoring Plan.
336	Mitigation	Snowbanks will typically be < 1 m tall in designated areas to facilitate caribou and moose crossing roadways.
337	Mitigation	Visual surveys for wildlife (including moose and caribou) will be undertaken prior to blasting. Blasting will be delayed if moose or caribou are observed within 500 m of the blast site.
338	Mitigation	Dens/nests/lodges of Newfoundland marten, arctic hare or muskrat identified prior to construction will be flagged and appropriate buffers will be maintained around these features.
339	Mitigation	Any known hives of yellow-banded bumble bee will be flagged and appropriate avoidance buffers will be maintained.



**PROJECT NUJIO'QONIK**  
**Environmental Impact Statement**  
**Appendix 26-A Commitments Table**  
August 2023

ID #	Mitigation Type	Commitment Description
340	Mitigation	Vegetation removal and herbicide application will be in accordance with relevant permit conditions and regulatory requirements, including prescribed timing windows.
341	Mitigation	Vegetation management activities will be conducted in accordance with the <i>Pesticide Control Regulations</i> under the Newfoundland and Labrador NL EPA and are subject to approval from NLDECC Pesticide Control Section.
342	Mitigation	Collisions, near misses or observations of mortalities on site roads and/or involving Project vehicles will be reported and adaptive management measures will be implemented should any locations of high-frequency interactions be identified.
343	Mitigation	Feeding, hunting or harassment of wildlife by on-site Project personnel will be prohibited.
344	Mitigation	Safe driving practices, including speed limits, will be implemented to avoid collisions with SAR and other wildlife.
345	Engagement	WEGH2 will form community liaison committees and implement a community feedback and response protocol.
346	Mitigation	Wind turbine ice throw and ice drop mitigation will be evaluated and implemented on a turbine-by-turbine basis. For turbines where mitigation measures are deemed necessary, one or all of the following mitigation measures (informed by best practices described by CanREA (2020)) will be considered: i. Limit access to wind farms using fences or private property signs where possible; ii. Inform local populations of the risk and instruct local populations to avoid approaching to within the maximum throw distance of a wind turbine, when operating during icing conditions (290 m in this case); iii. Add signage on nearby public access roads or trails indicating the risk of ice throw. These signs can be equipped with signal lights to indicate an ongoing icing event. Consider recreational activity trails (snowmobile, hiking, skiing, etc.) when determining sign placement to support high visibility; iv. Implement more stringent icing shutdown algorithms to the wind turbine supervisory control and data acquisition (SCADA) system for turbines that have been determined to be near an at-risk area, to further mitigate risk; v. Visually inspect turbines that have been determined to be near an at-risk area, after an icing shutdown and prior to re-start; vi. Install ice detection sensors on the nacelle or blades, to increase accuracy in detecting icing events and trigger shutdown of the wind turbine during icing events (i.e., effectively turning ice throw events into ice drop events).
347	Mitigation	Efforts will be made to avoid or reduce interactions with sensitive areas such as known recreational / subsistence LRU areas through micro-siting around key Project components during detailed design.
348	Mitigation	WEGH2 will work to confirm the location of receptors (i.e., seasonal cabins) within the Project Area during detailed design.
354	Mitigation	WEGH2 will install a real-time water quality/quantity network as determined by further consultation with the NLDECC Water Resources Management Division to monitor for potential adverse effects to surface and groundwater quality and quantity throughout the Project Area.
357	Mitigation	Grid power will be used instead of onsite power generation where possible.



**PROJECT NUJIO'QONIK**  
**Environmental Impact Statement**  
**Appendix 26-A Commitments Table**  
August 2023

ID #	Mitigation Type	Commitment Description
358	Mitigation	Vegetation and Land Cover field surveys will be completed prior to design completion to increase understanding of and confidence in the potential interactions between the Project and wetlands and vegetation, including rare plants, and aid in micro-siting in consultation with NLDFFA-WD. The construction footprint will be adjusted to avoid sensitive wetland and vegetation features, including rare plants, where possible.
359	Mitigation	When practicable, vegetation clearing in areas where grubbing is not required (e.g., in collector and transmission line RoWs) will be completed during frozen ground conditions, and if possible, when snow cover is present, to limit disturbance to soils, particularly in wetland areas. Localized grubbing will be required at electrical structure locations to support construction and maintenance. Collector lines will be routed adjacent to roads where possible.
360	Mitigation	Vegetation clearing will be limited within wetlands without tall vegetation (i.e. 4.15 m) that could interfere with electrical lines
361	Mitigation	Heavy machinery will be limited within the footprints of wetlands that will be cleared but not infilled (such as those within collector and transmission lines). Heavy equipment will be required at structure locations where wetland avoidance was not possible. Localized backfill with culverts may be required at electrical structure locations to provide sufficient structure support.
362	Mitigation	Herbicides for vegetation management will not be used within 300 m of wetlands or known instances of vegetation SAR or SOCC. Herbicides will only be used for control on non-native invasive plants.
363	Mitigation	Vegetation clearing in collector and transmission line RoWs will be limited to hand clearing of vegetation over 2.15 m in height within a buffer of known instances of vegetation SAR or SOCC. Vegetation control is expected to occur once every ten years.
364	Engagement	Establish a community engagement program during wind turbine operation to receive and address community concerns related to issues such as audible noise and shadow flicker.
365	Mitigation	WEGH2 will limit development in PPWSAs where practical. No development will occur in PPWSAs considered to be High Risk (e.g., Piccadilly Head-Unnamed Brook, Port-au-Port West-Aguathuna-Felix Cove, Jim Rowe's Brook). If Project activities extend into PPWSAs, these activities will be conducted in conjunction with approval from the jurisdictional authority.
366	Mitigation	Permitting requirements under Section 39 of the <i>Water Resources Act</i> will be followed for any development in PPWSAs.

