



Project Nujio'qonik

Environmental Impact Statement Amendment

January 2024



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1.0 Introduction

Project Nujio'qonik (pronounced *new-geo-ho-neek*; the “Project”) is named after the Mi'kmaw term for St. George's Bay, Newfoundland and Labrador (NL), which means “where the sand blows”, to pay homage to the Mi'kmaq First Nations people who are among the original inhabitants of Atlantic Canada. The Project, as proposed by World Energy GH₂ LP (WEGH₂), involves the development, construction, operation and maintenance, and eventual decommissioning and rehabilitation of two onshore wind farms and one of the first Canadian commercial-scale, “green hydrogen” and ammonia production plants powered by renewable wind energy.

Located on the western coast of the Island of Newfoundland, key components of the Project will include onshore wind farms, situated on Crown lands in the Port au Port and Anguille Mountains areas of NL, and a hydrogen / ammonia plant, situated on a privately owned brownfield site at the Port of Stephenville (in the Town of Stephenville, NL) that is zoned for industrial use. The wind farms will each generate approximately 1 gigawatt (GW) of renewable power that will be transmitted to the hydrogen / ammonia plant and used to produce up to approximately 206,000 metric tonnes (t) of green hydrogen (equivalent to approximately 1.17 megatonnes [Mt] of ammonia) annually via electrolysis. The hydrogen / ammonia plant will have an installed electrolyzer capacity of approximately 1,200 megawatts (MW) and will have the ability to be expanded in the future. Initial plans include the hydrogen produced by the Project will be converted into ammonia and exported to international markets by ship from an existing marine terminal in the Port of Stephenville. The Project also includes civil works and supporting infrastructure and facilities associated with the two wind farm sites, the hydrogen / ammonia plant, and the ammonia storage and export facilities. The Project is anticipated to generate clean electricity from onshore wind farms and produce green hydrogen and ammonia at scale, thereby positioning Canada as a global leader in clean hydrogen production, use, and export.

The Project is subject to provincial environmental assessment (EA) requirements under the NL *Environmental Protection Act* and associated *Environmental Assessment Regulations* (EA Regulations). On June 21, 2022, WEGH₂ submitted a registration to initiate the EA process. Following a period of government review and public comment, the Minister of Environment and Climate Change (the Minister) determined that the Project would require an Environmental Impact Statement (EIS). An Environmental Assessment Committee (EAC) was established composed of both provincial and federal regulators, and provincial EIS Guidelines were formally issued for the Project on December 1, 2022. On August 22, 2023, WEGH₂ submitted the EIS to the provincial government for review. Following a 70-day review period that commenced on August 22, 2023, and included a public comment period, the Minister advised on October 31, 2023, that additional information would be required and WEGH₂ would be required to submit an Amendment to the original EIS. The requirement for an Amendment is consistent with previous large projects that have been subject to the EIS process in the province.

1.1 Amendment Organization and Content

The EIS Amendment is intended to:

- Describe refinements to the Project description since submission of the original EIS (Chapter 2)
- Provide an update on engagement activities conducted by WEGH2 since submission of the original EIS and address public concerns identified through both of these ongoing activities and public review of the EIS (Chapter 3)
- Provide a response to the comments and questions identified by government reviewers (Chapters 4 to 15). These comments ranged from acknowledgements that WEGH2 had met specific guideline requirements to requests for clarifications on information presented in the EIS or for additional information. Further information on these requests is provided below.

The requests for additional information were received in a consolidated table representing 457 comments as summarized in Table 1.1. In general, the following broad deficiency topics were identified by government as requiring additional information:

- Water use and monitoring
- Baseline data and information
- Assessment of potential environmental and cumulative effects
- Mitigation and monitoring plans
- Emergency response and contingency plans

Chapter 2 provides Project updates and describes refinements to the Project Description since submission of the EIS. It contains an update on the overall status of the Project, an update on field programs that have occurred since submission of the EIS and an update on development of the required monitoring plans. It also contains an overview of the Project refinements that have occurred since submission of the EIS. It also reviews the implications of these changes for the assessment information presented in the EIS and whether the change has implications for mitigation measures and monitoring commitments found in the EIS.

Chapter 3 provides a public engagement update and a summary of engagement activities that have occurred since the EIS submission, including issues raised and how these issues have been addressed, such as property owner questions on Noel's Pond and stream elevation monitoring, upcoming community engagement opportunities, as well as opportunities for employment as part of the Project. The chapter also addresses the public consultation comments provided by government to WEGH2 as part of the EIS review.

Each comment received from government was given a unique number and a response has been prepared. Specific responses to comments and clarifications requested by governmental departments are addressed in Chapters 4 to 15 of this EIS Amendment, as outlined in Table 1.1.

Table 1.1 EIS Amendment Organization

EIS Amendment	Government Department
Chapter 4	NL Department of Environment and Climate Change (NLDECC)
Section 4.1	Pollution Prevention Division
Section 4.2	Water Resources Management Division
Section 4.3	Climate Change Branch
Section 4.4	Natural Areas Program and Natural Areas Division.
Chapter 5	NL Department of Fisheries, Forestry and Agriculture (NLDDFA)
Chapter 6	NL Department of Health and Community Services (NLDHCS)
Chapter 7	NL Department of Industry, Energy and Technology (NLDIET)
Section 7.1	Energy Branch
Section 7.2	Mining and Mineral Development Branch
Chapter 8	NL Department of Justice and Public Safety (NLDJPS)
Chapter 9	NL Department of Municipal and Provincial Affairs (NLDMPA)
Chapter 10	NL Department of Tourism, Culture, Arts and Recreation (NLDTCAR)
Chapter 11	NL Department of Transportation and Infrastructure (NLDTI)
Chapter 12	NL Immigration, Population, Growth and Skills (IPGS)
Chapter 13	Digital Government Services NL (DGSNL)
Chapter 14	Environment and Climate Change Canada (ECCC)
Chapter 15	Fisheries and Oceans Canada (DFO)

In addition, on November 24, 2023, NLDECC provided WEGH2 with a summary of departmental concerns noted during the EIS review and a summary of public concerns received. Tables of concordance for the summary of departmental concerns, and where they are addressed, are provided in Section 1.3 for ease of reviewing. Public concerns and where they are addressed are provided in Chapter 3.

During follow-up consultation on the EIS Amendment with regulators, some further written requests for information were received by WEGH2. These have also been addressed in this EIS Amendment.

1.2 Amendment Response Approach

Chapters 4 through 15 provide a response in tabular format to each request for information from regulators. In developing this EIS Amendment, WEGH2 has aimed to adequately address the information needed or clarification requested by the reviewer:

- Review comments that acknowledged where the EIS met the requirements of the EIS Guidelines or identified future permitting requirements for WEGH2 have been noted and acknowledged. In these instances, no further response is required.
- For review comments that require more information to address a deficiency, the amendment responses include a written narrative with technical or scientific detail to address the reviewer’s comment. Where the response requires additional mapping or detailed technical content, this information has been appended to the respective response.
- In instances where the reviewer’s comment is requesting additional Project details that are not yet available due to the current stage of Project design, this has been identified along with commitments to continue to consult with regulators on the requested issue and to provide this information prior to construction.
- Section 2.2 of the EIS Amendment updates the current status of the collection of site-specific environmental field data. Technical data reports for 2023 field programs that were available as of the time of submission of this EIS Amendment have been appended.

1.3 Summary of Information Requirements

A summary of the requests for additional information and WEGH2’s responses are provided in Tables 1.2 to 1.12 along with EIS Amendment section references for further information.

Table 1.2 Summary of Concerns Received from NLDECC - Climate Change Branch

Summary Information Requirement	Summary of WEGH2 Response
<p>The EIS does not demonstrate that the existing electrical grid has the capacity to meet the energy demands of the Project prior to the Port au Port wind farm being able to supply the required energy and does not address how back up and consistent energy demands will be met should the existing grid not have the capacity to meet these demands. The amendment should provide a fulsome description of the intended alternative energy supply and its potential environmental effects, mitigations and assessed risk.</p> <p>If alternate energy options are needed that are fossil fuel dependent, the Project may meet thresholds to be regulated under the <i>Management of Greenhouse Gas Act</i> (MGGA) and would be subject to Best Available Control Technology (BACT) under the <i>Regulations</i>.</p>	<p>Please see Ch 4, response CCB2 - WEGH2 acknowledges that potential energy sources in addition to renewable power sources will be considered along with the potential application of MGGA and BACT under the regulations.</p>

Table 1.3 Summary of Concerns Received from NLDECC - Natural Areas Program

Summary Information Requirement	Summary of WEGH2 Response
The Proponent is required to apply to construct a portion of new transmission line (TL) from Stephenville to Codroy Wind Farm that passes through the Bras Mort Bog, as it has interim protection. Government approval for TL construction through the Bras Mort Bog is required. The requirement for this application and approval should be acknowledged in the EIS.	Please see Ch 4, response NAP 1 - WEGH2 acknowledges that government approval for transmission line construction through Bras Mort Bog is required.

Table 1.4 Summary of Concerns Received from NLDECC - PPD

Summary Information Requirement	Summary of WEGH2 Response
The operation of the Air Separation Unit, including throughput, potential emissions, interaction with other sources, and the management of moisture and air contaminants such as particulates	Please see Ch 4, response PPD 1 - Additional explanation of the air separation unit operation is provided.
Butane storage	Please see Ch 4, response PPD 5 - The need for butane storage is no longer required by the Project.
Chemicals that may be used as part of operations associated with the hydrogen / ammonia plant	Please see Ch 4, response PPD 6 - WEGH2 has prepared an Emergency Response and Contingency Plan for the Project, including chemicals associated with the hydrogen / ammonia plant.
Source water quality, treatment and purification for the electrolyzer	Please see Ch 4, response WRM 13 - Further clarification is provided on the industrial water process and infrastructure.
Characterization of wastewater effluent from the hydrogen / ammonia plant, including a description of the design and effectiveness of any effluent treatment system to be used to demonstrate whether the effluent can be expected to consistently meet the discharge limits specified in the Environmental Control Water and Sewage Regulations (this could be provided in the Waste Management Plan)	Please see Ch 4, responses PPD 9; PPD10 - Further clarification is provided on characterization of the hydrogen / ammonia plant wastewater effluent.
Air emissions for back-up power supply, derivation of the emission factors and associated emissions for both construction and operation need to be better articulated for all identified emission sources, emissions for butane and the operation of cooling towers.	Please see Ch 4, response PPD 11 - Additional explanation of air emissions including emission factors is provided.

Table 1.5 Summary of Concerns from NLDECC - WRM Division

Summary Information Requirement	Summary of WEGH2 Response
The EIS does not provide an evaluation of the available yield of the industrial water supply as per the WRMD Industrial Water Supply and Wastewater Design Guidelines. A standard water balance should be provided.	Please see Ch 4, response WRM 12 - Further clarification of the industrial water supply is provided.
The peak electricity demand period needs to be described in actual months, to understand peak water demands.	Please see Ch 7, responses EB 30; EB 34 - Further clarification is provided on electricity demand and the System Impact Study process.
An analysis of the cumulative effects of surface water withdrawal on industrial groundwater users in area is needed.	Please see Ch 4, responses WRM 42; WRM 43 - Further clarification is provided on water usage and management for the Project.
The water quality of the proposed industrial supply has not been sufficiently described to understand the scale and methods of treatment that will be required to purify the water for the electrolysis process, chemicals and quantities that may be used, and whether this is economically viable.	Please see Ch 4, responses WRM 3; WRM 12; WRM 71 - Further clarification is provided on water and wastewater treatment for the Project.
A clear breakdown of the total water use (total raw water, total cooling water, total electrolysis water) for each phase of the Project is required.	Please see Ch 4, response WRM 48 - Further clarification of the industrial water supply and process is provided.
Total wastewater volume must be clearly defined for each process, including primary treatment and reverse osmosis, and must be balanced with water use requirements and per cent lost.	Please see Ch 4, response WRM 58 - Further clarification of the industrial water supply and process is provided.
A description of the solid waste stream from water treatment/RO treatment was not included in Waste Management Plan. Once facility process streams are finalized, WRMD should be provided with details regarding how the RO membranes would be cleaned and the plans for that waste stream.	Please see Ch 4, response WRM 71 - Further clarification is provided on water and wastewater treatment for the Project.
The Emergency Response/Contingency Plan does not describe a contingency in the event that the industrial water supply is not available/sufficiently available (e.g. under drought conditions).	Please see Ch 4, responses WRM 48; WRM 76 - Further clarification of the industrial water supply is provided.
The long-term monitoring plan does not address the requirements for real-time water quality and quantity monitoring (RWQM) of surface water, groundwater and public water supplies in the local assessment area. A RTWQ monitoring network is to be established prior to Project construction, in consultation with the WRMD.	Please see Ch 4, responses WRM 46; WRM 47 - Further clarification is provided on water quality and quantity management and use.

Table 1.5 Summary of Concerns from NLDECC - WRM Division

Summary Information Requirement	Summary of WEGH2 Response
The effects of constructing turbines near public water supplies must be described including the effects of storage and disposal of excavated materials at wind farm sites.	Please see Ch 4, responses WRM 7; WRM 9; WRM 35; WRM 44; WRM 57; WRM 76 - Further clarification is provided on surface water use and management during construction and operation.
More information is needed in the Environmental Protection Plan (EPP) to describe measures that will be undertaken to mitigate the effects of road construction / upgrades in or near public water supplies, watercourses, and wetlands, particularly in small and intermittent streams in the Project, local and regional assessment areas.	Please see Ch 4, responses WRM 55; WRM 56 - Further clarification is provided on water crossings, roads and construction near watercourses and wetlands.
The capacity of the Stephenville public water supply to service the demands of the proposed temporary accommodations facility has not been demonstrated, and alternatives have not been described.	Please see Ch 4, response WRM 3 - Further clarification is provided on the Town of Stephenville's ability to serve the proposed temporary accommodations.
The capacity of the Stephenville municipal wastewater treatment system to service the flows from the proposed temporary accommodations facility has not been demonstrated, and alternatives have not been described.	Please see Ch 4, response WRM 3 - Further clarification is provided on the Town of Stephenville's ability to serve the proposed temporary accommodations. WEGH2 will install a separate wastewater treatment system.
The Project proposes to increase water levels in Noels Pond, Muddy Pond and Mine Pond by two metres. Noels Pond and Muddy Pond are included in the designated floodplain for the town of Stephenville, and any increase in water levels may result in flooding and public safety concerns. A Flood Risk Analysis and a Dam Break Analysis is needed.	Please see Ch 4, responses WRM 15; WRM 18; WRM 43 - Further clarification is provided on water levels in Noels Pond and Muddy Pond and concerns around flooding are addressed.
The effects of climate change (e.g., rising sea levels, storm surge and waves) on the hydrogen-ammonia production facility have not been described. The location of the hydrogen and ammonia plant includes land that is less than four metres in elevation, which would be vulnerable.	Please see Ch 4, response WRM 52 - Further clarification is provided on the effects of climate change regarding the hydrogen / ammonia plant.
Potential effects of blasting at turbine sites to nearby dams has not been evaluated. Any activity within 2000 m of a public water supply dam should follow Canadian Dam Safety Guidelines adopted by WRMD, and this should be acknowledged in the EIS.	Please see Ch 4, response WRM7 - Further clarification is provided on blasting and proximity to dams.
Locations of proposed concrete batch plants should be described including water supply, and management of effluent and surface water run-off.	Please see Ch 4, response WRM 10 - further clarification is provided on batch plant locations and water management.

Table 1.5 Summary of Concerns from NLDECC - WRM Division

Summary Information Requirement	Summary of WEGH2 Response
Verification of ownership of water level control systems at Mine Pond, Noels Pond and Muddy Pond is needed, and demonstration of permission given to Proponent to alter/operate water level control systems if applicable.	Please see Ch 4, response WRM 60 - Further clarification is provided on water control structures and ownership.

Table 1.6 Summary of comments received from NLFFA

Summary Information Requirement	Summary of WEGH2 Response
Avifauna	
Insufficient field data to validate and enhance available literature on the presence/absence of avifauna, species at risk (SAR), species of conservation concern (SOCC), migratory birds, related habitat, migratory routes (e.g. Atlantic Flyaway), rare plants and lichens in the Project area.	Please see Ch 5, responses FFA 12; FFA 13; FFA 14; FFA 15; FFA 16 - Further clarification is provided on planned field surveys for SAR, SOC and avifauna.
With respect to the predicted environmental effects and measures to mitigate the adverse effects of the Project on avifauna: <ul style="list-style-type: none"> discussion on impacts on resident species and populations is still outstanding for the entire Project site; SAR Impacts Mitigation and Monitoring Plan (IMMP) and Avifauna Management Plan is still outstanding; therefore the EIS cannot address the full suite of environmental effects and associated mitigation measures on fauna; and the Proponent is required via the SAR IMMP process to provide robust information on each species through field surveys in order to produce and evaluate effectiveness of mitigations and monitoring plans under the SAR IMMP. 	Please see Ch 5, responses FFA 12; FFA 13; FFA 14; FFA 18 - Further clarification is provided on the development of a SAR IMMP in consultation with the department, as well as planned field surveys for SAR, SOC and avifauna.
Bats	
The Guidelines require a pre-construction bat survey during a full active season (April 15 to Oct 31), including a summarized data and raw call files. The EIS describes only the fall monitoring season.	Please see Ch 5, response FFA 14 - Further clarification is provided on planned field surveys for avifauna including bats.
The Guidelines require the EIS to describe measures that will be undertaken to mitigate the effects of all phases of the Project on bats. Note: the requested monitoring season of April 15 to Oct 31 could be completed under the SAR IMMP process where the Proponent will be required to provide full coverage of requested monitoring season as well as ARU raw call files in order to produce and evaluate effectiveness of mitigations and monitoring plans under the SAR IMMP.	Please see Ch 5, response FFA 14 - Further clarification is provided on the development of a SAR IMMP in consultation with the department and planned field surveys for avifauna including bats.

Table 1.6 Summary of comments received from NLFFA

Summary Information Requirement	Summary of WEGH2 Response
SAR / SOCC	
<p>The Guidelines require the EIS to describe terrestrial flora (and fauna), including ecological land classifications, and unique geology/geomorphology.</p> <ul style="list-style-type: none"> Ecological classification (Object Based Image Analysis) is incomplete and may need to be supplemented with other methodology. 	<p>Please see Ch 5, response FFA 16 - Further clarification is provided on planned field surveys for SAR and SOC.</p>
<p>No information has been presented on the effects of the Project on the limestone barrens:</p> <ul style="list-style-type: none"> The Proponent needs to provide limestone barren habitat baseline analysis for the pre- and post-construction phases. The potential need for a strategy to restore limestone/gravel barrens has not been considered in the EIS as a potential mitigation. No specific mitigations stated for plant SOCC have been presented, and are missing for Lindley's Aster and Low Northern Rockcress (SAR). 	<p>Please see Ch 5, responses FFA 15; FFA 17; FFA 18 - Further clarification is provided on planned vegetation field surveys and the development of mitigation plans for effects on plant SOCC.</p>
Wetlands	
<p>Avoidance of Sensitive Wetland Areas (SWAs) must be demonstrated and specific impacts and locations are to be outlined in the EIS.</p>	<p>Please see Ch 5, response FFA 18 - Further clarification is provided on planned wetland field surveys and the development of mitigation plans for effects on wetlands.</p>
<p>The EIS acknowledges that there will likely be irreversible adverse changes to wetlands upstream from Gull (Mine) Pond and flooding of upland and wetland habitat types. Active restoration/rehabilitation measures should be developed to restore wetland function, rather than accepting this as an outcome of the Project. There is abundant research available on post-development wetland restoration from other parts of Canada, and this information could be used to develop an effective restoration plan.</p>	<p>Please see Ch 5, response FFA 24 - Further clarification is provided on wetlands upstream of Gull Pond.</p>
<p>Given the importance of wetland habitat, the many ecosystem services provided by wetlands and its role in carbon sequestration, it is unclear why the Proponent needs to berm Gull Pond to increase water storage within it. Consultation with FFA and WRMD is needed.</p>	<p>Please see Ch 5, response FFA 24 - Further clarification is provided on wetlands upstream of Gull Pond.</p>

Table 1.6 Summary of comments received from NLFFA

Summary Information Requirement	Summary of WEGH2 Response
<i>Cumulative Effects</i>	
<p>The effects of the Project on Lindley's Aster would directly overlap with the type of impacts (direct loss of species and associated habitat, increased potential for hybridization) resulting from the Lower Cove Quarry on the Port au Port Peninsula and is in close vicinity to the Project footprint. This should be clearly described as an example of a cumulative effect on a plant SAR.</p>	<p>Please see Ch 5, responses FFA 18; FFA 50 - Further clarification is provided on plant SAR, field surveys and the development of a SAR IMMP.</p>
<p>No information has been provided in the EIS about the cumulative effects of landscape fragmentation resulting from the Project.</p>	<p>Please see Ch 5, response FFA 18 - Further clarification is provided on plant SAR, field surveys and the development of a SAR IMMP.</p>
<i>Fish and Fish Habitat</i>	
<p>The Guidelines require characterization of fish habitat and fish populations by species and life stage, including a description of SOCC, threatened and endangered.</p> <ul style="list-style-type: none"> • The desktop review provides some information, particularly for species of concern, trout and eel, and also species likely to occur in affected water courses but insufficient knowledge to assess actual occurrences. • No information is provided regarding field surveys, fisheries dependent or independent data. • Inadequate characterization of fish habitat and populations, critical / sensitive habitats, spawning and nursing areas, as required by the Guidelines. • Insufficient assessment of work windows/ sensitive times of year. • Baseline studies insufficient to provide meaningful predictions of project on fish passage impacts or likelihood of protected species within area, more data required). • Quantitative species biodiversity has not been used. 	<p>Please see Ch 5, response FFA 19 - Further clarification is provided on fish and fish habitat field data collection and reporting, as well as mitigation measures.</p>
<i>Moose</i>	
<p>The Guidelines require pre-construction moose baseline survey, predicted environmental effects, and mitigations.</p>	<p>Please see Ch 5, response FFA 20 - Further clarification is provided on moose field surveys, effects and mitigation measures.</p>
<p>Surveys are proposed for winter 2024 to gather baseline data on current moose populations/ distribution in relation to the Project footprint. Proponent/consultant to contact the Wildlife Division (WD) to confirm survey areas as the Project footprint has changed.</p>	<p>Please see Ch 5, response FFA 20 - Further clarification is provided on moose field surveys, effects and mitigation measures.</p>

Table 1.6 Summary of comments received from NLFFA

Summary Information Requirement	Summary of WEGH2 Response
Most significant effects on moose anticipated due to habitat loss associated with road and windmill footprints and the significant increase in access provided by the road construction.	Please see Ch 5, response FFA 20 - Further clarification is provided on moose field surveys, effects and mitigation measures.
Caribou	
The Guidelines require pre-construction caribou baseline survey, predicted environmental effects, and mitigations.	Please see Ch 5, response FFA 21 - Further clarification is provided on caribou field surveys, effects and mitigation measures.
Surveys are proposed for winter 2024 to gather information related to caribou presence/absence in relation to the provided Project footprint.	Please see Ch 5, response FFA 21 - Further clarification is provided on caribou field surveys, effects and mitigation measures.
Proponent/consultant to contact WD to confirm survey areas as the Project footprint has changed.	Please see Ch 5, response FFA 21 - Further clarification is provided on caribou field surveys, effects and mitigation measures.
Most significant effects on caribou anticipated due to habitat loss associated with road and windmill footprints and the significant increase in access provided by the road construction.	Please see Ch 5, response FFA 21 - Further clarification is provided on caribou field surveys, effects and mitigation measures.
The baseline information from surveys will inform geographically dependent mitigations based on cumulative effects of existing developments within these geographic areas.	Please see Ch 5, response FFA 21 - Further clarification is provided on caribou field surveys, effects and mitigation measures.
Muskrat	
<p>The Guidelines require pre-construction muskrat baseline survey, predicted environmental effects, and mitigations.</p> <ul style="list-style-type: none"> • Surveys will be completed in fall between September 1 and November 1, 2023. These should be described in the EIS and effects, mitigations, risk assessment and residual effects or Project design updated, as applicable. • No indication in EIS that habitat has been identified and delineated through outreach to locals, trappers (and FFA). 	Please see Ch 5, response FFA 22 - Further clarification is provided on muskrat field surveys.
Arctic Hare	
Arctic Hare assessment was not required by the Guidelines, as focus was on Port au Port Wind Farm, and Codroy Wind Farm was not anticipated. Discussions between consultant and FFA resulted in Arctic Hare baseline survey being recommended for inclusion in EIS.	Please see Ch 5, response FFA 23 - Further clarification is provided on arctic hare field surveys.

Table 1.6 Summary of comments received from NLFFA

Summary Information Requirement	Summary of WEGH2 Response
Due to the extension of footprint into Cape Anguille Mountains, Arctic Hare needs to be added to the SOCC category as distribution is uncertain and potential overlap with/impacts from Project components exists.	Please see Ch 5, responses FFA 23; FFA 105 - Further clarification is provided on arctic hare field surveys.
Wildlife Division supplied Arctic Hare Pellet Survey protocol to the Proponent. The survey is proposed for late April/early May 2024	Please see Ch 5, response FFA 23 - Further clarification is provided on arctic hare field surveys.

Table 1.7 Summary of Comments Received from HCS

Summary Information Requirement	Summary of WEGH2 Response
Nearest Receptors	
<p>The Guidelines require the EIS to provide GPS locations and proximity of Project components to existing environmental features, including but not limited to the nearest temporary and permanent residential dwellings and commercial and industrial sites.</p> <ul style="list-style-type: none"> The location and rationale for selecting the nearest receptors is not clearly explained or described. Proximity of specific residential dwellings, commercial and industrial sites to Project components do not appear to be provided. The Socio-Economic Environment and Land and Resource Use Baseline Study notes potentially affected receptors in the LAA and Project Area, including campgrounds, cemeteries, churches, beaches, cultural sites, historic places, hospitals, Outfitters lodges, parks, public wharfs, recreational facilities, scenic lookouts, schools, senior's homes, tourism operators, trails and unique sites. 	<p>Please see Ch 6, responses HCS 1; HCS 4 - Further clarification is provided on the selection of receptors for the Project.</p>
Noise	
<p>A quantitative assessment of noise assessment was not included in the EIS.</p> <ul style="list-style-type: none"> HCS notes the construction period is described to be 30 months in length. Construction noise at any given location lasting more than 1 year may need to be assessed as operational noise, according to Health Canada's Guidelines. The Guidelines require the EIS to describe noise emissions from the Project in terms of predicted decibels, turbine sites, duration and geographic reach of noise, including long-term, low frequency noise emissions. 	<p>Please see Ch 6, response HCS 6 - Further clarification is provided on the noise emissions assessment for the Project.</p>

Table 1.7 Summary of Comments Received from HCS

Summary Information Requirement	Summary of WEGH2 Response
HSC notes the baseline study for noise was limited to 16 locations, with measurements collected between May 16 and 26, 2023. While the EIS indicates that these sites are representative of the nearest receptors, other EIS maps show receptors that are closer to Project components and/or further from highway noise than the chosen baseline monitoring sites. More information is required to justify the monitoring site selections. Additional receptor sites may need to be assessed.	Please see Ch 6, response HSC 9 - Further clarification is provided on noise emissions from the Project.
HSC notes that the specific locations of certain Project components (e.g. worker accommodations, wind turbines, explosives storage areas) and consequently the nearest receptors, are not provided.	Please see Ch 6, responses HCS 1; HCS 4; HCS 9, HCS 11 - Further clarification is provided on noise emission receptors.
<i>Shadow Flicker</i>	
While there are no provincial regulations or guidelines regarding shadow flicker, industry standards are commonly based on those applied to turbines in Germany, where there are limits of: a maximum of 30 minutes per day and a maximum of 30 hours per year, as noted in the EIS reference (Koppen, 2017). The assessments provided in Appendices 19-C and 19-D seem to only consider the 30 hour per year maximum standard.	Please see Ch 6, response HCS 11 - Further clarification is provided on shadow flicker and associated standards.
Only "active" dwellings were considered in the shadow flicker assessments (Appendices 19-C and 19-D), however inactive dwellings may become active in the future, or may be used seasonally, and should be considered in the assessment.	Please see Ch 6, response HCS 11 - Further clarification is provided on shadow flicker and receptors.

Table 1.8 Summary of Concerns from DIET - Energy Branch

Summary Information Requirement	Summary of WEGH2 Response
Page 2.77 of the EIS notes that "WEGH2 is not currently seeking a non-firm energy rate other than the PUB scheduled rates. However, the anticipated benefits of potentially supplying electricity to the grid are detailed in Section 2.3.4.5." IET notes that Section 2.3.4.5 is not included in the EIS.	Please see Ch 7, response EB 6 - Further clarification is provided on non-firm energy rates.
The EIS refers to various codes and standards that may be applicable to the Project, but it does not specify which codes and standards the Project's various components will be designed to meet and/or seek certification under.	Please see Ch 7, response EB 9 - Further clarification is provided on codes and standards applicable to the Project.

Table 1.8 Summary of Concerns from DIET - Energy Branch

Summary Information Requirement	Summary of WEGH2 Response
The Project will likely require an exemption from the Lieutenant-Governor in Council from subsection 14.1(2) of the <i>Electrical Power Control Act, 1994</i> , under the authority of subsection 14.1(7) of the Act. This should be noted in the EIS.	Please see Ch 7, response EB 11
The EIS does not detail distance of wind turbines from electrical infrastructure.	Please see Ch 7, responses EB 24; EB 27 - Further clarification is provided on wind turbines and proximity to electrical infrastructure.
The EIS does not demonstrate that access to the energy required from the electrical grid has been secured from NL Hydro but notes it has filed applications for service from NL Hydro.	Please see Ch 7, response EB 27 - Further clarification is provided on energy infrastructure requirements for the Project.
The baseline study does not provide a detailed description of the components of the province's existing electrical transmission infrastructure in the study area.	Please see Ch 7, response EB 27 - Further clarification is provided on energy infrastructure requirements for the Project.
The EIS lacks information on interconnection to the province's electrical grid and the potential need for further development of existing facilities to integrate the Project.	Please see Ch 7, response EB 27 - Further clarification is provided on energy infrastructure requirements for the Project.
The EIS lacks the geographical footprint and routing to assess proximity to existing infrastructure and any consequential risk of interference, including but not limited to the province's high voltage direct current (HVdc) infrastructure.	Please see Ch 7, response EB 27 - Further clarification is provided on energy infrastructure requirements for the Project.

Table 1.9 Summary of Concerns from DIET - Mining and Minerals Development Branch

Summary Information Requirement	Summary of WEGH2 Response
The EIS does not clearly account for quarry material needs or the balance of material needs vs. material production as a byproduct of road construction, does not identify specific candidate sites for sourcing quarry materials, processing quarry materials or storing quarry materials, and does not address whether the surficial or bedrock materials available for extraction within access road rights-of-way will be suitable in meeting the required specifications for the various granular products needed.	Please see Ch 7, responses MMD 15; MMD 18; MMD 20; MMD 24; MMD 28; MMD 29 - Further clarification is provided on material needs, production, potential quarry sites and other aspects of quarry operations.
The assessment of the Project's contributions to cumulative effects and cumulative interactions lacks relevant detail.	Please see Ch 7, response MMD 28 - Further clarification is provided on cumulative effects and interactions related to quarry operations.

Table 1.10 Summary of Comments from DMPA

Summary Information Requirement	Summary of WEGH2 Response
The mapping is deficient, and does not clearly display municipal planning areas, municipal boundaries or protected roads (e.g., BSA-4 Figure 4.2), as required by the Guidelines.	Please see Ch 9, responses DMPA 1; DMPA 2; DMPA 3; DMPA 4; DMPA 8 - Further clarification is provided on EIS mapping and associated revisions.
The EIS acknowledges municipal approvals may be required for proposed activities in Stephenville, Kippens and Cape St. George (Section 1.3.3). Approvals may also be required for Project activities planned within the boundaries of Port Au Port West-Aguathuna-Felix Cove, Port Au Port East and Stephenville Crossing.	Please see Ch 9, responses DMPA 5; DMPA 6 - Further clarification is provided on municipal approvals required for the Project.
The EIS baseline study for the atmospheric environment (BSA-1) does not provide information with respect to the distance of the nearest wind turbine(s) to municipal boundaries or planning areas.	Please see Ch 9, responses DMPA 10; DMPA 11 - Further clarification is provided on wind turbine locations in relation to municipal boundaries and planning areas.
The EIS should describe the process for addressing Project components which are non-compliant as a permitted or discretionary use within established land use zones as per registered Municipal Plans and Development Regulations under Section 24 of the <i>Urban and Rural Planning Act, 2000</i> . The EIS should provide information as to rezoning of lands if required/ amendment of Municipal Plans and Development Regulations pursuant to Section 25 of the <i>Urban and Rural Planning Act</i> .	Please see Ch 9, responses DMPA 5; DMPA 6; DMPA 13; DMPA 17 - Further clarification is provided on discretionary use, rezoning and amendment applications in relation to the Project.

Table 1.11 Summary of Concerns from ECCC

Summary Information Requirement	Summary of WEGH2 Response
13.0 Avifauna, Table 13.8 "Mitigation Measures: Avifauna" (p.41 of pdf) - there are many examples of hedging and ambiguous language (e.g., "to the extent practicable", "where practicable", "where possible", "where feasible", "whenever possible" and "where applicable" in this table (and various sections of the EIS, such as section 2.1, p.25 and others). ECCC recommends removing ambiguous wording and clarifying commitments to implementing mitigation measures. ECCC recommends that this Mitigation Table indicate proposed mitigation and monitoring measures to avoid adverse effects on migratory birds including preventative measures related to wind farm operations during optimal bird and bat migration conditions (e.g., reducing cut-in speeds or altering the pitch/feathering of blades, monitoring weather conditions, temporary remote shutdowns, etc.).	Please see Ch 14, response ECCC 14 - Further clarification is provided on the development of avifauna mitigation measures for the Project.

Table 1.11 Summary of Concerns from ECCC

Summary Information Requirement	Summary of WEGH2 Response
<p>13.0 Avifauna, section 13.2.1.2 "Field Surveys" (p. 7 of pdf), it is stated: "At the time of writing this assessment, the only field surveys that have been completed are winter coastal waterbird surveys". The assumption is that many more baseline survey efforts are coming which will inform the EIS and conclusions related to significance. ECCC recommends that the EIS clarify whether there will be an opportunity to comment on survey design before these surveys are implemented which will be relevant to migration monitoring and effects monitoring.</p>	<p>Please see Ch 14, response ECCC 5 - Further clarification is provided on avifauna surveys conducted in 2023 and recent discussions with regulators.</p>
<p>ECCC considers the proposed Project to have a "very high site sensitivity" (see Table 1 and section 8.2 factors of concern, ECCC, 2007 Wind Turbine and Birds A Guidance Document for Environmental Assessment, and ECCC-ATL, 2022 Guidance Update). The EA Division recommends that the Proponent consult with FFA and ECCC regarding methodology for assessing the potential effects of both wind farm sites on birds.</p>	<p>Please see Ch 14, response ECCC 5 - Further clarification is provided on site sensitivity as well as methodology for assessing potential effects of wind energy sites on avifauna.</p>
<p>ECCC recommends the use of paired additive and interactive Generalized Additive Models to assess the cumulative impacts on birds. The EA Division recommends that the Proponent consult with FFA and ECCC regarding methodology for assessing the potential effects of both wind farm sites on birds.</p>	<p>Please see Ch 14, response ECCC 5 - Further clarification is provided on methodology for assessing potential effects of wind energy sites on avifauna.</p>
<p>ECCC is of the view that the loss of habitat and increases in collision risks from transmission lines have not been adequately characterized in the EIS, and measures have not been identified to avoid/minimize the risk. ECCC recommends that the Proponent consider where the proposed interconnections transmission lines right-of-way intersect areas used as flight paths by birds (e.g., migration, travel routes from nesting to foraging areas, watercourses and streams used by waterfowl) and demonstrate how the proposed configuration is optimal for avoiding avian collisions and electrocution. Existing infrastructure, such as the existing transmission lines, wind energy project(s), as well as any new infrastructure which could impact migratory birds should also be considered as part of the cumulative effects assessment. If available, wildlife monitoring data from existing and adjacent infrastructure/projects should be considered.</p>	<p>Please see Ch 14, response ECCC 16 - Further clarification is provided on effects on avifauna between existing transmission lines and new ones that would be built as part of the Project.</p>

Table 1.11 Summary of Concerns from ECCC

Summary Information Requirement	Summary of WEGH2 Response
<p>13.0 Avifauna, Table 13.8 "Mitigation Measures: Avifauna" (p.41of pdf) ID #73, ECCC notes that "a post-construction wildlife mortality monitoring program will be established, and carcass searches will be conducted at the turbines between April and October", however, this does not include monitoring transmission lines in areas where flight paths of migratory birds such as water birds, waterfowl/ sea duck and shorebirds may intersect lines.</p>	<p>Please see Ch 14, response ECCC 16 - Further clarification is provided on effects and monitoring programs for avifauna in relation to transmission line infrastructure, as well avifauna data collected in 2023.</p>
<p>ECCC notes that there is a gap in the data to determine if sea duck actually cross over the Port-au-Port Peninsula, or if they circumnavigated around it, but it is known that they converge around the Port-au-Port Peninsula. We know the eiders are vulnerable to wire strikes during periods of low visibility and these conditions are very common on the Gaffs and the Port-au-Port in spring. ECCC notes that there are gaps in our knowledge of sea duck use that should be addressed, and we recommend a deeper analysis of the available telemetry data (and more data will be available soon).</p>	<p>Please see Ch 14, response ECCC 19 - Further clarification is provided on available sea duck information and assessment of effects in relation to the Project.</p>
<p>ECCC notes that bird attraction to lights and flaring is discussed in sections that follow this table (section 13.5.2.2 Operation and Maintenance, p. 74 of pdf). However, ECCC notes that Table 13.8 "Mitigation Measures: Avifauna" discusses artificial lighting only during the construction phase and not operational phase. ECCC recommends adding mortality caused by bird attraction to lights and collisions at substations, the hydrogen/ ammonia processing facilities, including flare stack, and port facilities, and a consideration of mortality events (particular in the spring and fall, and during periods of inclement weather such as fog).</p>	<p>Please see Ch 14, response ECCC 22 - Further clarification is provided on avifauna mortality in relation to attraction to light sources from the Project.</p>
<p>ECCC notes that the EIS Avifauna section 13.6 "Determination of Significance" (p. 85 of the pdf) states "Increase in avifauna mortality is predicted to be low in magnitude because there are no concentrations of birds (e.g., colonies, migration bottlenecks) close to proposed wind turbines." Given the importance of the LAA/RAA to migratory birds, ECCC strongly recommends clarifying EA predictions based on information available through desktop studies supported by baseline surveys/ studies and scientific literature.</p>	<p>Please see Ch 14, response ECCC 40 - Further clarification is provided on EIS predictions based on desktop data as well as the incorporation of field data collected in 2023.</p>

Table 1.12 Summary of Concerns from DFO

Summary Information Requirement	Summary of WEGH2 Response
<p>The Project includes three marine-based components that have footprints ranging in size from moderate to extensive. Each component requires additional information in order for DFO to assess interactions and potential impacts to fish, fish habitat, fisheries, and other aquatic resources.</p>	<p>Please see Ch 15, response DFO 1 - Further clarification has been provided on Project marine components and information on fish, fish habitat, fisheries and other aquatic resources.</p>
<p>Two Marine landing sites have been identified as a mitigation measure (#290) to potentially reduce impacts on local roads. These structures would be used throughout construction to offload the large materials required to build each turbine. The document only provides approximate measures of the built infrastructure needed at the two marine sites. DFO recommends providing additional information pertaining to the proposed marine landing sites to assess Project interactions with local fisheries and aquatic resources, including the final locations and if the landing sites would be temporary or permanent. The Proponent should be advised that DFO would require site-specific fish and fish habitat information to determine if a <i>Fisheries Act</i> Authorization is required, following completion of the environmental assessment.</p>	<p>Please see Ch 15, response DFO 1 - Further clarification has been provided on Project marine components and information on fish, fish habitat, fisheries and other aquatic resources.</p>
<p>Submarine cable - the document describes the placement of 6.4 km of submarine cable as an alternative transmission system. The proposed routing/length is pending a geotechnical investigation. To assess the interactions of the submarine cable on local fisheries and aquatic resources, additional information on the routing and length should be provided.</p>	<p>Please see Ch 15, response DFO 1 - Further clarification is provided on the marine cable and information on fish, fish habitat, fisheries and other aquatic resources.</p>
<p>Dredging - the Proponent should be advised that DFO would require site specific fish and fish habitat information on the dredge and dredge disposal sites to determine whether a <i>Fisheries Act</i> Authorization is required, following completion of the environmental assessment.</p>	<p>Please see Ch 15, response DFO 1 - Further clarification is provided on Project marine components and information on fish, fish habitat, fisheries and other aquatic resources.</p>
<p>More information is recommended to describe how watercourse crossings, specifically culverts and bridges, would be maintained to ensure the safe passage of fish and avoid or mitigate impacts to fish habitat from erosion and sedimentation events.</p>	<p>Please see Ch 15, response DFO 2 - Further clarification is provided on watercourse crossings in relation to fish, fish passage and fish habitat</p>
<p>There are references in the EIS to a Food Social and Ceremonial (FSC) license held by Qalipu First Nation, however, Qalipu First Nation does not currently hold FSC licenses; there are no FSC licenses held in 4R. DFO suggests all references to existing FSC fisheries be removed. A FSC license may be issued to Qalipu First Nation in the future, therefore, reference to FSC can be kept in Tables 21.2 and 21.3.</p>	<p>Please see Ch 15, response DFO 4 in relation to FSC licenses in the Project area.</p>

Table 1.12 Summary of Concerns from DFO

Summary Information Requirement	Summary of WEGH2 Response
<p>The descriptions of the existing aquatic environment have been based on Appendix BSA-2: Aquatic Environment Baseline Study, which was primarily completed using a desktop assessment. Additional information is required on the various Project components (e.g., locations, construction methods, etc...) and how they may interact with and potentially impact fish, fish habitat, local fisheries, and other aquatic resources in the marine environment. While the desktop assessment, classifications, and assumptions used may be based on proven methods and practices as described, it does not meet Fisheries and Oceans Canada guidance for the data collection used to define a baseline for the classification of fish habitat or fish species for the purposes of the regulatory phase (i.e., requirement for <i>Fisheries Act</i> Authorization). The desktop assessment represents a prediction of the physical environment found at each of the identified sites and may not accurately represent the current environment (as per the Project EIS guidelines section 4.3.2). Through previous consultation with the Proponent, DFO expressed the requirement to have site-specific data collected at each potentially impacted site and to have the characterizations based on that data for managing these impacts during the regulatory phase.</p>	<p>Please see Ch 15, response DFO 4 - Further clarification is provided on 2023 aquatic field data collection in addition to desktop information provided in the EIS.</p>
<p>The EIS indicates that the Proponent would develop and submit a "Groundwater and Surface Water Monitoring Plan" to regulatory authorities before construction begins. This document should provide a level of information related to water use and management to ensure impacts on fish and fish habitat are mitigated. The Proponent should meet with DFO to determine the required information and mitigations in the plan.</p>	<p>Please see Ch 15, response DFO 7 - Further clarification has been provided on the development of a groundwater and surface water monitoring plan for the Project.</p>

1.4 Next Steps and Key Considerations

Following submission of the EIS Amendment, there will be a 50-day public consultation period and review by the EAC. Following the 50-day review period, and within 70 days of receiving the EIS Amendment, the Minister will issue a determination regarding the acceptability of the EIS Amendment to address the deficiencies. During the upcoming review period, and following the Minister's decision, WEGH2 will continue to meet with the public and regulators to satisfy commitments in the EIS and the EIS Amendment.

In preparing this EIS Amendment, WEGH2 would like to summarize several key considerations:

- **WEGH2 is confident that the information supplied in this EIS Amendment will allow the Minister to determine the environmental effects of the Project and make a decision on the acceptability of the Project.** Most projects that are in the EA process have not undergone final Project design and there are regulatory mechanisms in place (e.g., conditions of EA release, permitting, compliance activities of the EA Division and other regulators) to address refinements to the project design that continue past EA release. These mechanisms can be used to address current information gaps for this Project that will be filled during final Project design. WEGH2 has also committed to key mitigation measures that will influence final Project design. For example, while the turbine layouts have not been finalized (and will not be finalized until completion of geotechnical programs and environmental baseline studies), WEGH2 has committed to maintaining a 1-km turbine setback distance from residences and to meeting Health Canada noise guidance requirements. The final turbine layout will reflect these commitments.
- **WEGH2 is committed to conducting required environmental field programs.** Baseline surveys have already been conducted in 2023 for the atmospheric environment, water resources, fish and fish habitat, vegetation, avifauna, bats, and muskrat. Additional surveys are planned in 2024 for caribou, moose, and arctic hare, along with continued collection of data for the surveys initiated and not completed in 2023. As indicated in the EIS Guidelines, these programs are required to support mitigation and monitoring plans. Available reports from 2023 data collection have been appended to this EIS Amendment and WEGH2 expects the completion of the remaining programs to be a condition of EA release and prior to construction.
- **The additional information presented in this EIS Amendment does not change the conclusions of the EIS with respect to the significance of residual effects of the Project.** With the implementation of planned mitigation and monitoring programs, residual effects of the Project are predicted to be not significant for all VECs, with the exception of the change in species diversity for the wetlands and vegetation VEC. Those effects on species diversity, including species at risk, will be further managed by impact avoidance, where possible, and by implementation of the Species at Risk Impact Mitigation and Monitoring Plan (SAR IMMP), which will be developed in consultation with the NL Department of Fisheries, Forestry and Agriculture – Wildlife Division.

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- **The Project design takes advantage of several key aspects that reduce the potential for environmental effects.** Wind energy is an established technology used around the world with well understood environmental effects and mitigation measures. While the province has not yet adopted specific guidance or standards for wind energy projects, WEGH2 has used available standards in other jurisdictions to inform mitigation and monitoring commitments for this Project. The hydrogen / ammonia plant is located at a previously used industrial site, allowing the use of existing infrastructure, as well as proven technology. This includes use of an existing marine terminal, a brownfield site and associated infrastructure.
- **The Project will generate global, national, and local benefits.** The Project will generate clean electricity from onshore wind farms and produce green hydrogen and ammonia at scale, thereby positioning Canada as a global leader in clean hydrogen production, use, and export. The Project has the potential to transform the path to global net-zero across a number of key emitting sectors and industries in Canada and beyond, thereby offering national and international benefits. The Project will also bring economic and social benefits to the province of NL and its residents, and will be particularly impactful to the communities of southwest NL. WEGH2 will remain committed throughout the Project to provide benefits that will flow to the province through employment and skills development, contracting and participation for traditionally underrepresented groups, opportunities for NL suppliers and contractors, as well as substantial planned community investment and First Nations partnerships.
- **Strong stakeholder engagement and support.** WEGH2 began consultation and engagement with stakeholders early in the process and will continue to engage throughout the life of the Project. To date, WEGH2's stakeholder consultation and engagement has resulted in the following: Comprehensive understanding of stakeholders' priorities, concerns and questions; detailed input from Indigenous leaders, including letters of support and memoranda of understanding (MOUs); input from the Town of Stephenville, municipalities and local service districts in the area; strong community activity and engagement, including a committee developed to work with WEGH2 that represents the Port au Port Project area, and a community rally initiated by local residents and business owners to demonstrate support for the Project; and growing interest in the Project, particularly in relation to employment, training, and service / supply opportunities.
- **Newfoundland & Labrador / Atlantic Canadian partners** supplemented by leading global engineering and energy company, SK- are committed to developing a project that the province and country will be proud of. WEGH2 is committed to the successful development and operation of the Project, and envisions balancing commercial success with a safe working environment, effective environmental management, and the creation of lasting social benefit. WEGH2 will implement high standards for environmental performance as part of its commitment to safe and responsible environmental, social, and economic development.

2.0 Project Updates and Refinements to the Project Description Since Submission of the EIS

2.1 Update on Overall Project Status

Since August 2023, Project Nujio'qonik (the Project) has achieved key milestones, which have helped de-risk the Project, including securing the Crown lands required for development, recording one full year of wind data, advancing discussions with green energy offtakers, and developing partnerships with global players in the energy transition. Highlights of the Project's key milestones since August 2023 include:

- July/August 2023: Pre-FEED (front-end engineering design) completed
- August 2023: Environmental Impact Statement (EIS) submitted
- August 2023: Crown lands secured
- September 2023: Scholarships for College of the North Atlantic's green energy programs announced
- December 2023: One year of wind data achieved
- January 2024: First North American member of the ENERGY HUB Port of Wilhemshaven, Germany

2.1.1 Wind Measurement Campaign

The site-specific wind measurement campaign is an integral part of the Project's development. As of December 2023, a full 12 months of wind data were recorded from key meteorological evaluation tower (MET) sites on the Port au Port Peninsula. At least 12 months of wind data are required to adequately model the wind profile and to order custom equipment for the wind farms. This wind data is essential for demonstrating the viability of the Project location and for planning the specific equipment required.

The industry standard for collecting wind data is to install METs instrumented with multiple wind measurement sensors. With the MET data, World Energy GH₂ (WEGH2) can confirm the site-specific wind resource and calculate the expected energy production and net capacity factor for the wind farms. Subsequently, these data are used to determine the precise wind turbine size and model for each site, ensuring proven, bankable technology that is suitable for utility-scale wind generation projects.

As of December 2023, WEGH2 reached the one-year milestone for the wind measurement campaign on the Port au Port Peninsula. There are five MET sites planned for the area, with four sites having METs installed and operational. The fifth MET is anticipated to be completed in winter 2024.

WEGH2 initiated a wind measurement campaign for the Codroy Wind Farm in the Anguille Mountains in Q3 2023. Two METs have been installed to-date, with plans to install the remaining three METs in 2024.

2.1.2 Team and Office Expansion

In September 2023, WEGH2 expanded its headquarters in St. John's, NL, by leasing a roughly 11,500 square-foot office space in downtown St. John's. This larger, centralized office helped bring the current team together in one space and allows for future growth. WEGH2 currently has 47 team members, including local employees and a broader consulting team located around the world. Team members are based in the following locations:

- St. John's Office (22 team members)
- Stephenville Community Office (3 team members)
- Port of Stephenville (5 team members)
- Remote locations (remaining team and consultants)

In October 2023, WEGH2 welcomed a full-time Indigenous Relations Manager to the team, based in the St. John's office. The new team member is a Mi'kmaw woman, and member of Qalipu First Nation, who grew up in the Project Area and has deep knowledge of the people and cultures particular to the area.

2.1.3 Scholarships for College of the North Atlantic's Green Energy Students

On September 21, 2023, WEGH2 announced a substantial investment in the future of green energy development in Newfoundland and Labrador (NL). WEGH2 committed approximately \$180,000 to fund scholarships for students in College of the North Atlantic's (CNA's) Wind Turbine Technician and Hydrogen Technician programs. All of the 21 students enrolled in the 2023-2024 academic year have been provided with full funding for their programs, including tuition, textbooks, certifications, etc. Following the Project's environmental approval and final investment decision, WEGH2 intends to offer employment to as many of the graduating students as possible.

2.1.4 Advancing Investment and Offtake Discussions

The Project is attracting considerable interest from investors and offtakers. WEGH2 has a lengthy list of potential investors, offtake partners, developers, engineering and technology firms, vendors and contractors, amongst many others, that are interested in participating in the project. WEGH2 remains very positive about the immense global investor interest in the Project.

WEGH2 has been in discussions with key global energy companies regarding offtake agreements, focusing on companies with stated commitments to securing long-term green hydrogen / green ammonia supply. Offtakers are only interested in viable projects that have demonstrated good progress, and Project Nujio'qonik is viewed favourably by many customers / offtakers due to its progress.

2.1.5 International Collaboration

On January 26, 2024, at a signing ceremony in Wilhemshaven, Germany, WEGH2 officially became the first North American member of the Port of Wilhemshaven’s ENERGY HUB. Multiple Federal German officials were in attendance at this groundbreaking event, as follows:

- Siemtje Möller, Parliamentary State Secretary at the Federal Ministry of Defence of Germany, Member of the Bundestag representing Lower Saxony
- Martin Gade, Member of the State Parliament of Lower Saxony
- Dr. Stefan Kaufmann, Member of the Bundestag representing Stuttgart

All participated in the signing ceremony between WEGH2 and the ENERGY HUB, followed by a tour of the Port of Wilhemshaven.

Wilhelmshaven will be one of the first German ports to receive green hydrogen from Canada, receiving revolutionary expedited energy project permits from the German government resulting from recent legislative changes. The ENERGY HUB is comprised of key industry and government players who are focused on European energy security and the global energy transition. World-leading companies such as Arcelor Mittal, BP, Engie, E.ON, Equinor, EWE, Gasunie, Orsted, RWE, and Uniper are among the ENERGY HUB’s membership.

Becoming the first North American member of the ENERGY HUB was an important step in building international collaborations and partnerships for the Project.

2.1.6 Baseline Surveys

WEGH2 and its consultants have conducted an extensive 2023 baseline study program as outlined in Table 2.1.

Table 2.1 Summary of Baseline Surveys Conducted in 2023

Discipline	Description of Surveys
Birds (Appendix 2-B of this EIS Amendment)	<ul style="list-style-type: none"> • Winter coastal waterbird surveys - aerial and land based (Feb-Mar 2023) • Purple Sandpiper/Harlequin Duck surveys - aerial (Feb-Mar 2023) • Nocturnal Owl Surveys (May 2023) • Spring and fall shorebird staging surveys (May-June; Aug-Oct 2023) • Spring and fall migration counts (May-June; Aug-Oct 2023) • Fall coastal waterbird surveys (Aug-Oct 2023) • Waterfowl breeding and fall migration surveys (May-Jul; Aug-Oct 2023) • Breeding Bird Surveys - point counts and ARUs (Jun-Jul 2023) • Marshbird Survey (June-July 2023) • Gull/Tern Colony Survey (June-July 2023) • Bank Swallow Survey (July-August 2023) • Short-eared Owl Surveys (May, July 2023) • Ten land based coastal waterbird surveys (Nov-Dec 2023) • Late fall/early winter surveys for waterfowl. (Nov-Dec 2023) • Resident landbird surveys (Nov-Dec 2023) • 110 ARU detectors were deployed

Table 2.1 Summary of Baseline Surveys Conducted in 2023

Discipline	Description of Surveys
Bats (Appendix 2-B of this EIS Amendment)	<ul style="list-style-type: none"> • 21 detectors were deployed in June or July • 3 detectors in MET towers • 5 detectors at control sites • 1 detector was deployed at a cave entrance in September • All detectors were retrieved in November • Habitats sampled included wetland, watercourses/waterbodies, mature forest, scrub, and barrens
Fish and Fish Habitat (Appendix 2-A of this EIS Amendment)	Fish habitat was classified at a total of 330 proposed watercourse crossings associated with the Port au Port Wind Farm and related infrastructure, and the hydrogen / ammonia facility. This includes 116 potential road crossings, 194 crossings associated with transmission and collector lines, and 20 locations associated with the hydrogen / ammonia facility, substation, and turbine footprints.
Vegetation and Rare Plants (Appendix 2-C of this EIS Amendment)	A Land Cover Classification (LCC) was developed for the Port au Port Local Assessment Area (LAA). Vegetation sample plots were collected from 73 representative land cover classes to inform the model and to describe land cover classes. Transects were established on Project infrastructure, with longer transects on higher priority turbines. Vegetation surveys were conducted on randomly selected transects, with a higher percentage of transects sampled on higher priority turbines. On transects, vascular plant species were recorded on first observation. Rare species (Species at Risk and Species of Conservation Concern) were recorded at each observation, including notes regarding population size. In total, 541 transects were surveyed, including 144 higher priority transects.
Muskrat (Appendix 2-B of this EIS Amendment)	Surveys for muskrat were conducted within the Project Area in September 2023. Survey methods consisted of a combination of habitat delineations (vegetation surveys) and surveying for muskrat sign (transect surveys). A total of 55 sites (ponds and wetlands) were visited, 74 habitat plots delineated, and 8,210.1 m of transects surveyed for evidence of muskrat. .
Moose/Caribou (To be provided to NLDDFA-Wildlife Division when surveys are complete)	A permit (WLR2023-20) to complete moose and caribou surveys was issued in 2023. However, due to snow conditions and through consultation with Newfoundland and Labrador Department of Fisheries, Forestry and Agriculture (NLDDFA)-Wildlife Division, the surveys were not completed in 2023. WEGH2 is committed to completing surveys for moose and caribou in 2024, prior to construction. WEGH2 will work with NLDDFA-Wildlife Division to confirm the survey approach and survey areas for moose and caribou via the 2024 permit application.

Table 2.1 Summary of Baseline Surveys Conducted in 2023

Discipline	Description of Surveys
Air Quality (Appendix 2-E of this EIS Amendment)	Baseline ambient air quality monitoring was conducted at two separate locations, one at the Stephenville Airport, and one in the community of West Bay. The monitoring completed during 2023 was split into three separate monitoring events: one in spring, one in summer, and one in fall/winter to monitor seasonable variability of contaminants. Particulate Matter less than 10 microns (PM ₁₀), Particulate Matter less than 2.5 microns (PM _{2.5}), Nitrogen Dioxide (NO ₂), and Sulphur Dioxide (SO ₂) were measured at both locations. Ammonia (NH ₃) was only measured at the Stephenville Airport, near the proposed ammonia facility. Baseline ambient air quality monitoring was conducted for these air contaminants as they are considered most relevant to characterize the baseline conditions before the construction of the wind farms and ammonia/hydrogen plant. Due to a compromised sample by the lab, the winter sample of NO ₂ at West Bay is planned to be resampled in February 2024.
Noise (Included with the EIS Submission in Appendix BSA-1 Atmospheric Baseline Study)	The baseline ambient sound levels within the Project Area were characterized by conducting a baseline sound quality monitoring survey. The baseline sound quality monitoring survey was conducted between May 16 and 26, 2023 at 16 locations. The baseline sound quality monitoring locations were chosen based on the presence of residential receptors near Project components.
Light (Included with the EIS Submission in Appendix BSA-1 Atmospheric Baseline Study)	Baseline light monitoring was conducted at the three selected locations: two on the Port au Port peninsula, and one near the Port of Stephenville. Ambient light monitoring included measurements of illuminance (lux) and sky glow (mag/arcsec ²). The lighting measurements were conducted on May 22, 2023 (sites 1 and 2) and on May 23, 2023 (site 3), just before midnight (between 11:30 pm and 11:50 pm).
Historic Resources (To be provided to the Provincial Archaeology Office when Completed)	<p>July 2023, a Historic Resources Overview Assessment (HROA) was completed for the Project, which focused on establishing the historic resources potential of the Project Area as a means of assisting with Project planning and to help establish the scope of any future Historic Resources Impact Assessment (HRIA) requirements.</p> <p>In accordance with provincial guidelines for a study of this nature (Government of Newfoundland and Labrador 1989; 1992), the primary objectives of the 2023 HRIA conducted in October 2023 were to:</p> <ul style="list-style-type: none"> • Verify if historic resources were present within either of the 33 areas identified for assessment (as well as the degree of potential that any such resources are extant); and • Recommend the appropriate methodology and scope for further detailed field assessment studies and/or specific mitigation measures to follow (such as site avoidance or additional subsurface testing and recording) if archaeological or other types of historic resources were identified or suspected to be present at any of the areas investigated.

2.1.7 Project Readiness

Prior to commissioning and operations, projects of this nature are generally comprised of four phases:

1. Feasibility study: Initial stakeholder engagement; preliminary design basis; technical and economic analysis; Class 5 cost estimate
2. Pre-FEED (Front-End Engineering Design): Conceptual design, key equipment identification; plant size determination; Class 4 cost estimate
3. FEED: Basic engineering complete; 3D model development; land and permitting secured; detailed risk assessments; Class 3 cost estimate
4. Implementation: Detailed engineering design, procurement, construction and testing

The Project has completed the pre-FEED phase and is preparing to enter the FEED phase of the Project’s development. In the FEED phase, the basic engineering will be completed, including 3D model development and micro-siting of wind turbine placement, and a detailed Project estimate will be developed.

2.2 Updates to Project-Specific Baseline Data Collection Programs

As indicated in the EIS, WEGH2 is committed to, and in the process of, conducting the site-specific environmental field programs identified in the EIS Guidelines and further defined through consultation with regulators prior to Project construction. A number of comments received through government review of the EIS (and addressed in this EIS Amendment) relate to the status of the field programs. Since receipt of the comments, WEGH2 has been consulting with Newfoundland and Labrador Department of Fisheries, Forestry and Agriculture (NLDDFA) – Wildlife Division for clarification on required field programs. NLDDFA confirmed requirements with WEGH2 as outlined in Table 2.2. WEGH2 will continue to work with NLDDFA – Wildlife Division to meet the requirements outlined in this table prior to construction. As indicated in Section 2.1.6 and further described below, a number of field studies have been completed in 2023, with results appended to this EIS Amendment.

Table 2.2 Information Required by Wildlife Division Prior to Construction

Surveys	Information Requirement Prior to Construction
Port au Port - Birds	<ul style="list-style-type: none"> • The desktop exercise for baseline data submitted in the EIS is sufficient; no further general avian baseline surveys are required prior to construction • However, should the project proceed, pre-construction surveys for birds species at risk (including Short-eared Owl and Common Nighthawk) will be required to inform development of the Species at Risk Impacts Mitigation and Monitoring Plan (requirement for S19 Permit under Endangered Species Act).
Port au Port – Other Wildlife	<ul style="list-style-type: none"> • A stratified random block moose survey is required for Moose Management Area 043 prior to construction but not necessary for the revised EIS submission document

Table 2.2 Information Required by Wildlife Division Prior to Construction

Surveys	Information Requirement Prior to Construction
Anguille Mountains / Codroy - Birds	<ul style="list-style-type: none"> New baseline data collected via field surveys are required prior to construction. Where there is limited information for the Anguille mountains area and construction is not scheduled to commence for a few years, the Proponent is required to discuss surveys and survey protocol with the Wildlife Division. Surveys will be required for species such as, but not limited to: Short-Eared Owl, Common Nighthawk, and Gray-cheeked Thrush prior to construction. Survey data for these species are needed to inform development of the Species at Risk Impacts Mitigation and Monitoring Plan (requirement for S19 Permit under <i>Endangered Species Act</i>).
Anguille Mountains / Codroy – Other Wildlife	<ul style="list-style-type: none"> New baseline data collected via field surveys are required prior to construction. Where there is limited information for the Anguille mountains area and construction is not scheduled to commence for a few years, the Proponent is required to discuss surveys and survey protocol with the Wildlife Division. Surveys will be required for species such as, but not limited to: at-risk plants, bats, mummichog, banded killifish, Arctic hare, ptarmigan, and muskrat prior to construction. Survey data for those species which are at-risk are needed to inform development of the Species at Risk Impacts Mitigation and Monitoring Plan (requirement for S19 Permit under <i>Endangered Species Act</i>).

As indicated above, since submission of the EIS, WEGH2 has continued to conduct field programs in various disciplines, including for air quality, fish and fish habitat, vegetation, birds, bats and muskrat (as described in Section 2.1.6). The comprehensive bird and bat baseline data collection program undertaken was based on guidance provided by ECCC-CWS (2022) and input from provincial government agencies. This entailed a suite of bird and bat field surveys conducted in and adjacent to the Project Area.

These baseline data will be used to support the various permitting requirements for the Project (e.g., fish and fish habitat field data) and development of the environmental effects monitoring plans / programs (EEMPs) (refer to Section 2.3 of this EIS Amendment), as required in the EIS Guidelines. Available technical data reports for field programs conducted in 2023 are attached to this EIS Amendment:

- 2023 Fish and Fish Habitat Technical Data Report (Appendix 2-A)
- 2023 Bird and Bat Interim Technical Data Report (Appendix 2-B)
- Land Cover Classification and Rare Plants Technical Data Report – Port au Port Wind Farm (Appendix 2-C)
- 2023 Muskrat Technical Data Report (Appendix 2-D)
- 2023 Air Quality Technical Data Report (Appendix 2-E)

Given the phased approach to construction, baseline data collection to date has focused on the Port au Port Peninsula, since it will be the first wind farm to be constructed. Baseline field data collection is planned in the Codroy area during 2024, along with continued baseline data collection on the Port au Port Peninsula. WEGH2 will engage Environment and Climate Change Canada – Canadian Wildlife Service (ECCC-CWS), as well as Newfoundland and Labrador Department of Fisheries, Forestry and Agriculture

(NLDFFA-Wildlife Division) in the development of the required Avifauna and Species at Risk Impacts Mitigation and Monitoring Plans (Section 2.3).

2.3 UPDATES TO ENVIRONMENTAL EFFECTS MONITORING PLANS / PROGRAMS

Follow-up and monitoring programs are intended to verify accuracy of effects assessment predictions, as well as the effectiveness of mitigation measures. Since submission of the EIS, WEGH2 has continued to progress development of the required Environmental Effects Monitoring Programs / Plans (EEMPs) for the Project, while recognizing that completion of these plans will depend on conditions of EA release and permitting conditions. As per the EIS Guidelines (Section 7.2.8), the EIS was required to include a description of the monitoring programs in the EIS, but the EEMPs were to be completed prior to initiation of Project construction:

- *[t]he EIS shall describe the environmental and socio-economic monitoring and follow-up programs to be incorporated into construction, operation and maintenance, decommissioning and rehabilitation activities (pg 45 of the Final EIS Guidelines)*
- *The EIS shall prepare and submit the EEMPs subsequent to the completion of the EIS, but before the initiation of Project construction (pg 47 of the Final EIS Guidelines)*

Since the EIS submission, draft tables of contents are now available for the following EEMPs and are appended to this EIS Amendment:

- Species at Risk Impacts Mitigation and Monitoring Plan Draft TOC (Appendix 2-F)
- Groundwater Monitoring Plan Draft TOC (Appendix 2-G)
- Surface Water Monitoring Plan Draft TOC (Appendix 2-H)
- Avifauna Impacts Mitigation and Monitoring Plan Draft TOC (Appendix 2-I)
- Outfitter Effects Monitoring Plan Draft TOC (Appendix 2-J)

WEGH2 will continue development of these site-specific monitoring plans, prior to Project construction at that site (i.e., Port au Port Wind Farm and associated infrastructure, Codroy Wind Farm and associated infrastructure, and hydrogen / ammonia plant and associated infrastructure). The plans will incorporate mitigation measures and monitoring commitments in the EIS and this EIS Amendment, will reflect applicable conditions of release from the EA process, and will include information on how and when updates to the plans will be made. The plans will be developed in consultation with applicable regulators and will be submitted for review prior to Project construction at that site. WEGH2 is committed to a best-in-class adaptive management approach and accordingly these plans are required to be “living” documents that will be updated as applicable to capture Project design updates and results of ongoing environmental monitoring.

2.4 UPDATES TO THE HYDROGEN / AMMONIA PLANT DESIGN

Since submission of the EIS, the pre-FEED (conceptual) design phase of the hydrogen / ammonia plant design has been completed. The plant design is substantially consistent with the design presented in the EIS, with some additional details and refinements / optimizations. These additional details and refinements / optimizations are described below and in response to the technical review of the EIS by government. The additional details on Project components already assessed in the EIS do not change the conclusions of the effects assessment presented in the EIS or the planned mitigation and monitoring measures. Where Project refinements / changes have been identified through the pre-FEED process, these are highlighted in the following sections along with their implications for the effects assessment and mitigation and monitoring.

In addition to the information in the following sections, additional information on some Project activities and components have been requested by regulators during their technical review of the EIS. Please refer to Chapter 4 of this EIS Amendment for the following information:

- The response to PPD 7 for additional information on the planned construction debris storage site
- The response to PPD 8 for a preliminary list of chemical and catalysts to be used in the process
- The response to WRM 13 for additional information on the industrial water supply
- The response to WRM 71 for additional information on solid waste treatment from the plant

2.4.1 Electrolyzer Technology

In the EIS, the hydrogen plant was originally conceived to be a combination of Proton Exchange Membrane (PEM) and Solid Oxide Electrolyzer Cell (SOEC) electrolyzers. PEM electrolyzers are now the preferred option, given their technology readiness level. Additionally, utilizing a single electrolyzer technology reduces technology and construction schedule risk.

An electrolyzer area was identified in the EIS and considered in the assessment, and additional detail is now available:

- The electrolyzer area will feature four large, steel-frame buildings for housing the electrolyzers in temperature-controlled buildings. There will be a further four steel-frame shelters with acoustic cladding for the hydrogen compressors. Other features will include a minimum of four vertical vessels acting as buffers between the electrolyzers and the hydrogen compressors, and a series of wet cell cooling towers providing a closed cooling water system for the electrolyzers.
- A prefabricated electrical house, installed on a raised foundation, will contain the electrical equipment to support the electrolyzers.

2.4.2 Ammonia Plant

An ammonia plant was identified in the EIS and considered in the assessment, and additional details are now available:

- The ammonia plant is a standard Haber Bosch design, currently in the early phases of development by a leading ammonia licensor, Haldor Topsoe of Denmark. This is a proven design installed in many locations in North America and the world.
- The infrastructure will include a compressor shelter, equipment modules, vertical process columns, pumps, a central pipe rack and a prefabricated electrical substation. Areas subject to the remote possibility of contamination will be paved and rainwater will be diverted to wastewater collection. The area will be provided with fire protection and firewater.

2.4.3 Air Separation Unit

An air separation unit (ASU) was identified in the EIS and considered in the assessment, and additional details are now available (and also included in the response to PPD 1 in Chapter 4 of this EIS Amendment):

- The ASU will be a standard industrial design commonly used in industrial facilities throughout Canada. These units go by several different names depending on the required product. They are also known as oxygen plants or nitrogen plants; however, the underlying technology is the same. The purpose of the WEGH2 ASU is to produce nitrogen for the ammonia synthesis reaction and for utility usage. Oxygen and other atmospheric gases will be returned to the atmosphere where they originated. The throughput of the unit is 51,600 NM³/hr. For reference, based on publicly available information, this is slightly larger than the oxygen plant (also an ASU) at the Vale Long Harbour Commercial Nickel Processing Plant (Vale Inco Newfoundland & Labrador Limited 2008).
- WEGH2 will facilitate a presentation from one of the leading proponents to explain the technology if this is of value to the reviewers. In the WEGH2 case, the nitrogen is recovered which requires a taller distillation column to recover the purity of nitrogen required for the ammonia synthesis loop.
- The ASU vendor has not yet been selected; however, the process is very similar between vendors of cryogenic systems. The feedstock is atmospheric air, which is filtered to remove particulates, then compressed. During the compression process, the compressed air is cooled and some of the water vapour in the air is condensed. To remove CO₂, hydrocarbon contaminants, and the remaining water, the compressed air is passed through a molecular sieve which removes those components. The purified air is then passed to a vertical refrigerated cold box. The cold box consists of cryogenic distillation and cooling components which separate the nitrogen from the air. The remaining oxygen rich gas has no current use in Stephenville so is vented back to the atmosphere. The atmospheric air components separated in the molecular sieve are vented back to the atmosphere. The water produced from the ASU is routed to the water treatment plant.
- The plant consists of a compressor shelter, vertical cold box, and a number of vertical cryogenic distillation towers with interlinking pipe racks. The infrastructure to support the ASU is simple, comprising foundations, prefabricated electrical substation, and nitrogen storage.

2.4.4 Wastewater

Subsequent to the completion of the Assimilative Capacity Study (Appendix 11-A of the EIS), an updated preliminary characterization of the wastewater effluent was developed during pre-FEED (refer to response to PPD 9 and Appendix PPD9-A in Chapter 4 of this EIS Amendment for details). A review of this updated wastewater effluent characterization has confirmed that effluent parameters previously assessed as not exceeding the Canadian Environmental Quality Guidelines (CEQG) for the Protection of Aquatic Life – Freshwater (CCME 1999) remain below guideline thresholds. Therefore, the Assimilative Capacity Study which used conservative concentrations/values remains valid.

2.4.5 Ammonia Storage and Loading Facilities

Ammonia storage and loading facilities were identified in the EIS and considered in the assessment, and additional details are now available based on proven, reliable designs:

- **NH₃ storage tank facilities:** two double-wall full containment ammonia storage tanks. The double walls are each made of steel, with insulation between the walls, and each tank is 62 m in diameter with a height of 27 m giving a working capacity of 55,500 m³ each. The tanks operate close to atmospheric pressure and a temperature of minus 30°C to 35°C. These tanks sit on concrete foundations and will likely require piling underneath
- **NH₃ loading facilities:** export pumps capable of delivering approximately 1,400 m³/hr into a delivery-pipe to the quayside. At the quayside, an ammonia loading arm will transfer the liquid ammonia to the tanker, a second loading arm will collect the ammonia gas displaced from the tanker as it fills and will return the vapour to the hydrogen / ammonia plant for collection. The delivery-pipe to the quayside will be equipped with custody metering to monitor the transfer of custody from the plant to the tanker vessel
- **Boil-off gas condensing facilities:** the boil-off gas condensing facilities receive the ammonia gas displaced during tanker loading, and the natural evaporation from the tanks, condense this gas and return refrigerated liquid to the tank
- **Infrastructure required to support the ammonia storage and loading facilities** includes foundations, stormwater drainage, firewater monitors, and an electrical substation

2.4.6 Pilot Flares

In the EIS, it was identified that butane would be used for the pilot flares. The current plan is to use propane. The quantity of propane to be used (3 kg/hr) is less than the assumed quantity of butane (~6.3 kg/hr) that the assessment in the EIS was based on. As the use of propane in pilot flares does not increase the calculated greenhouse gas emissions, there are no changes to the environmental effects assessment or to planned mitigation measures or planned follow-up and monitoring as a result of this revised layout. Refer also to the response to PPD 5 in Chapter 4 of this EIS Amendment for additional discussion.

2.4.7 Plant Site Roads

In the EIS, it was identified that prior to the commencement of construction, a heavy haul road would be built for the transportation of large equipment items and prefabricated equipment structures. Pre-Feed has identified that this road will originate in the port area, run parallel to the coast on the southern side of the plant and then follow the eastern perimeter. This road will be approximately 12 m wide. A network of 6 m-wide asphalt roads will be constructed to facilitate personnel and vehicular movement around the plant.

2.4.8 Back-Up Generator

In the EIS, it was noted that there would be 50 MW of stand-by auxiliary back-up power. The specific equipment to be used has not yet been chosen and will be selected when the FEED design is complete. The prime-mover equipment being considered will be either reciprocating engines or gas turbine(s), powering an electrical generator - both options utilizing renewable fuel. The back-up power prime-mover will likely be dual-fuel and able to use hydrogen or ammonia as an alternate fuel source in addition to other renewable fuel options under consideration. Currently, there are dual-fuel prime-mover options commercially available.

The impacts on greenhouse gas emissions and air quality emissions were considered for each unit type (reciprocating engine or gas turbine) and each fuel type (biodiesel, hydrogen, and ammonia). It was found that the conclusions of the atmospheric assessment included in the EIS would not change based on these alternatives, as detailed below.

The calculations for greenhouse gas (GHG) emissions from the back-up power unit presented in Chapter 6 of the EIS were based on a fuel emission intensity for the combustion of the specific biodiesel and not directly tied to a specific prime-mover. The combustion of hydrogen, or ammonia would not contribute to emissions of GHGs, and as such, assessing using biodiesel is considered conservative.

The air contaminant emissions presented in Chapter 6 of the EIS were based on the back-up power unit being a simple cycle combustion turbine combusting bio-diesel (gas turbine). A comparison of the emission profiles between a generator and combustion turbine of 50 MW were estimated to assess how a change to a reciprocating engine would impact the assessment. It was found that for all air contaminants but carbon monoxide (CO), using the combustion turbine estimation method was conservative (i.e., result in higher emission rates than the hypothetical generator, except for CO). Since the ambient standard for CO is a relatively high value (1-hour standard of 35,000 $\mu\text{g}/\text{m}^3$), this would not alter the conclusions of the assessment. The estimates of the emissions are provided in Table 2.3.

Table 2.3 Comparison of Emission Rates – Reciprocating Engine vs. Combustion Turbine

Air Contaminant	Hourly Emission Rate (g/s)	
	Reciprocating Engine	Combustion Turbine
Nitrogen Oxides (NO _x)	48.43	70.06
Carbon monoxide (CO)	48.43	0.26
Sulphur dioxide (SO ₂)	0.04	0.12
Total suspended particulate (TSP)	0.56	0.96
Particulate matter <10 microns) (PM ₁₀)	0.56	0.96
Particulate matter <2.5 microns (PM _{2.5})	0.56	0.96

2.5 ADDITIONAL REFINEMENTS TO THE PROJECT DESCRIPTION

Section 2.4 outlines supplementary information and refinements to the design of the hydrogen / ammonia plant. Since submission of the EIS in August 2023, additional aspects of the Project design have also continued to advance. The following sections outline these proposed changes and their implications for the effects assessment, mitigation measures and monitoring commitments identified in the EIS. This includes:

- Removal of some turbines from the Port au Port Wind Farm
- Identification of additional alternatives for the transmission line route across the isthmus from the Port au Port Peninsula to the mainland
- Removal of the proposed West Bay barge landing site option and confirmation that the Aguathuna landing site will be used
- Updates in planned capacity of the Stephenville accommodations camp and the addition of a Project-specific waste treatment facility for this accommodations camp
- Revised construction and operation schedule to reflect the current status of the environmental assessment process and offtake markets
- Specification of Port au Port concrete batch plant locations
- The existing effluent discharge pipeline from the former Abitibi operation has been deemed unsuitable, so will need to be replaced. A new wastewater discharge line will therefore need to be constructed along the same route, with discharge at the same location.

Note that additional information on potential quarry locations is provided in Chapter 7, in response to MMD 6.

Note also that the provincial government advised WEGH2 that the strength of Main Gut Bridge (Route 490) needed to be evaluated relative to the transportation of turbine components for the Codroy Wind Farm. WEGH2 retained Harbourside Engineering to conduct an evaluation of the Main Gut Bridge. The results of this evaluation indicate that Main Gut Bridge is a safe and reliable plan for shipment of turbine components to the Codroy Wind Farm. Please refer to the response to DTI-2 (Chapter 11 of this EIS Amendment) for further details. As Main Gut Bridge is an option for shipment of turbine components to the Codroy Wind Farm in the Anguille Mountains, there are no changes to the Project description or environmental effects assessment.

2.5.1 Port au Port Wind Farm Turbine Layout

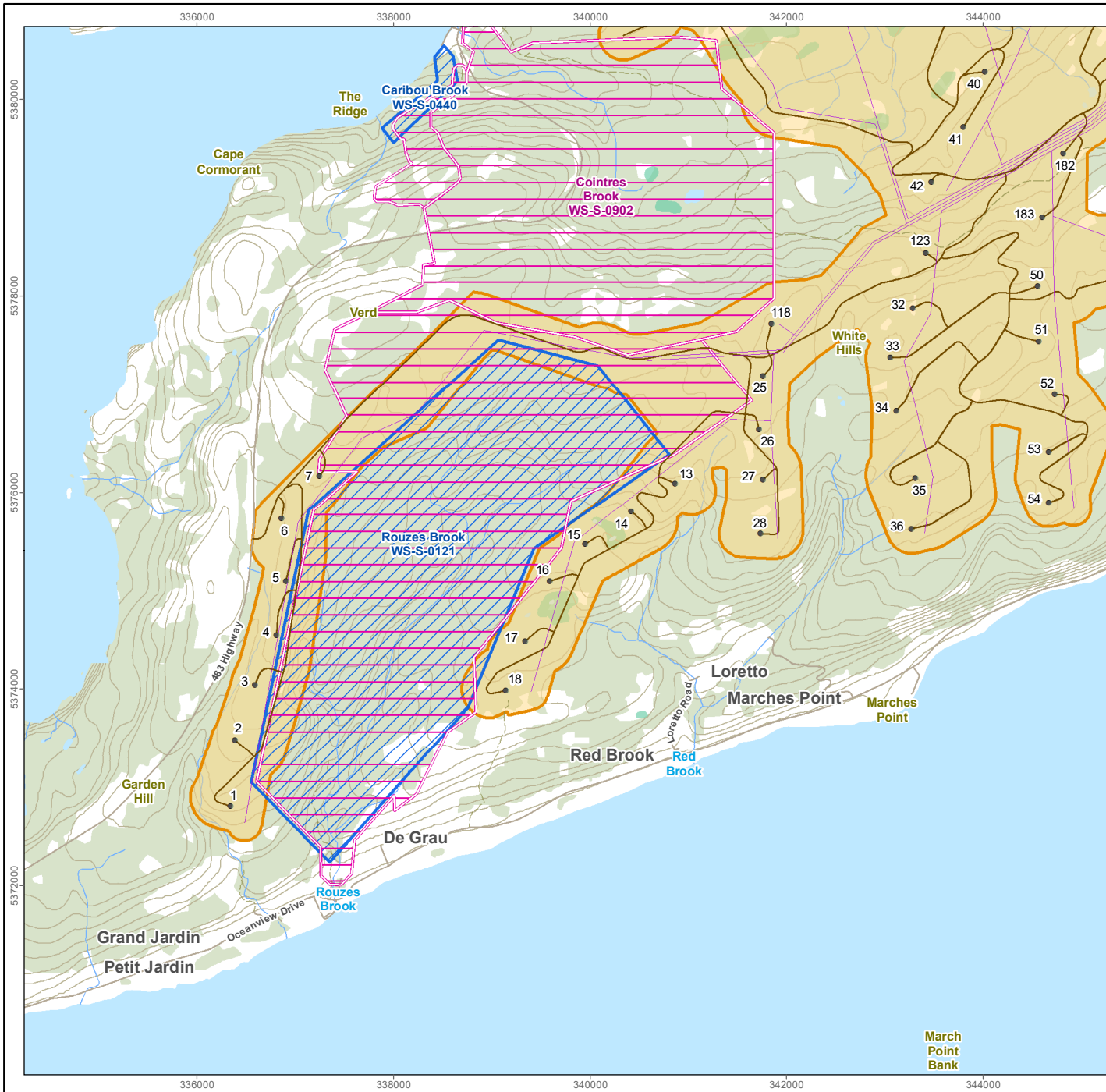
Description of Change

Since submission of the EIS, several constraints were identified through regulatory consultation that have affected turbine placement. These are outlined below:

- Proposed expansion of the Rouzes Brook Protected Public Water Supply area required removal of several turbines to avoid placement of Project infrastructure in this protected area (updated layout provided in Figure 2.1).
- Given the proximity of the turbines to the Stephenville airport, NAVCanada was required to review the layout of the Port au Port Wind Farm and has approved the layout; however, NAVCanada has rejected a number of turbines located in the mainland portion of the Port au Port Wind Farm (Pine Tree) (Figure 2.2) based on required radar setbacks.
- A number of turbines are within a granted petroleum lease on the west coast. While the petroleum lease is in both a protected water supply area and proposed ecological reserve, the turbines are outside both. WEGH2 will work towards shared use with the leaseholder.

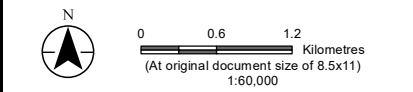
In total, the number of turbines planned for the Port au Port Wind Farm has decreased from a maximum of 171 to 155. The layout of the turbines will still be subject to micro-siting informed by planned geotechnical investigations, continued gathering of site-specific environmental field data and advancement of Project design. The removal of turbines results in the need to adjust the location of access roads and collector lines in the vicinity of these turbines. The design work to update these aspects of the wind farm are still in progress. The relocated access roads and collector lines will be located within the assessed Project Area and will be provided to government as part of Project permitting and prior to Project construction.

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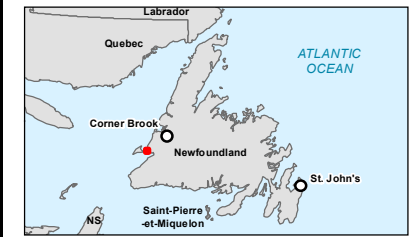


Stantec

Public Water Supplies	Other Features
Protected	Road
ILUC	Resource Road / Trail
Proposed Project Features	Contour (20 m)
Turbine Location	Watercourse
Collector Line	Waterbody
Access Road	Wetland
Project Area	Forested Area



- Notes**
1. Coordinate System: NAD 1983 CSRS UTM Zone 21N
 2. Data Sources: World Energy GH2, NRCan CanVec, OpenStreetMap
 3. Background: NRCan CanVec

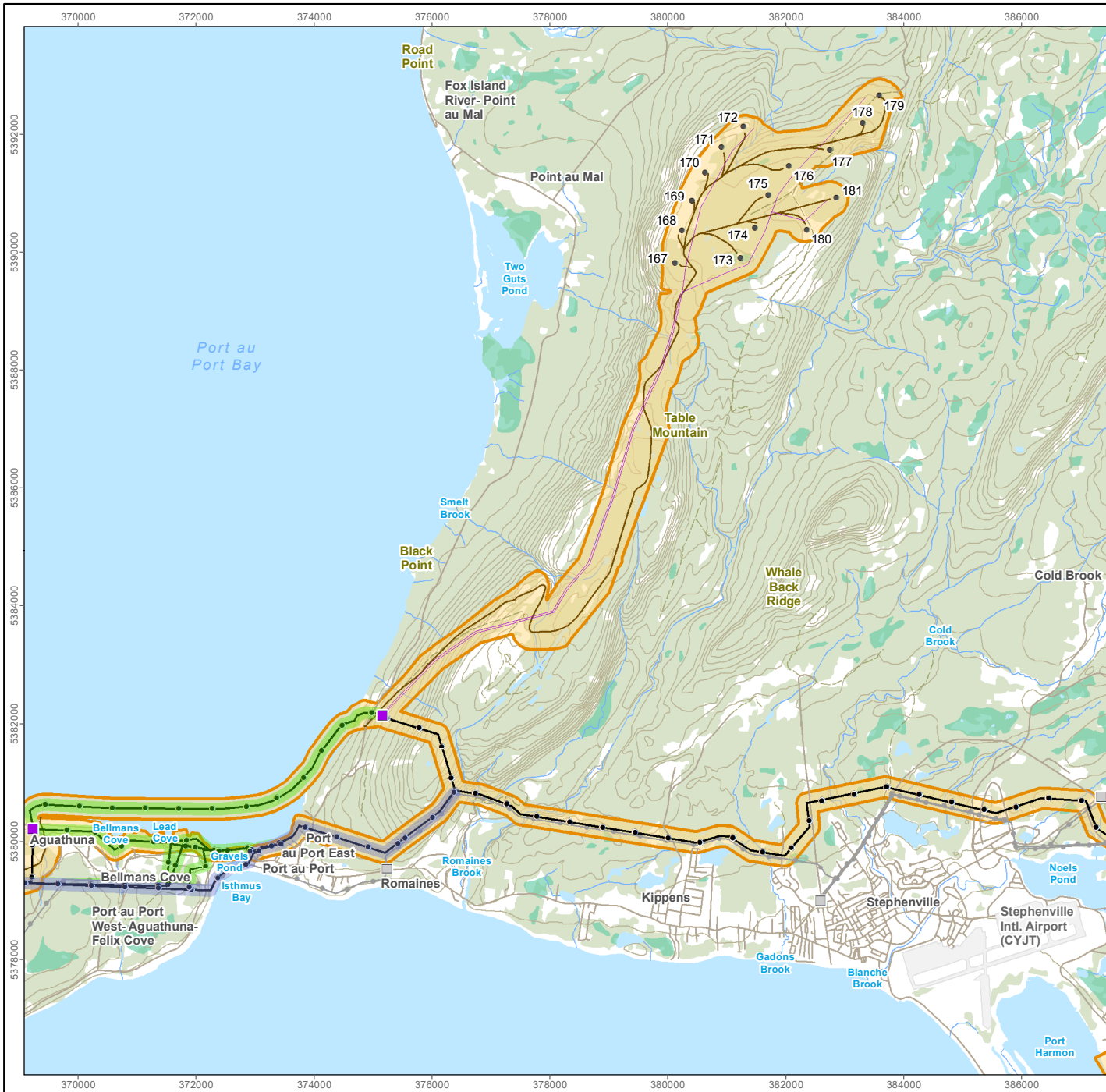


Project Location Stephenville NL	Prepared by MB on 2024-01-22 QR by AW on 2024-01-22
Client/Project World Energy GH2 Project Nujjo'qonik	121418050_023
Figure No. 2.1	

Revised Turbine Layout to Avoid Expanded Rouzes Brook Protected Water Supply Areas

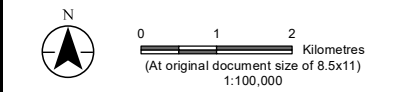
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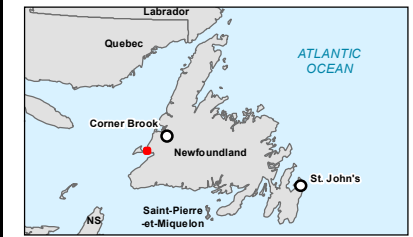


Stantec

Proposed Project Features	Other Features
• Turbine Location	■ Substation
■ Substation	— Transmission Line, Existing
— Transmission Line 230 kV	— Road
Port au Port Interconnection	— Resource Road / Trail
■ Proposed Route	— Contour (20 m)
■ Alternate Route	— Watercourse
— Collector Line	■ Waterbody
— Access Road	■ Wetland
■ Substation	■ Forested Area
■ Project Area	



Notes
 1. Coordinate System: NAD 1983 CSRS UTM Zone 21N
 2. Data Sources: World Energy GH2, NRCan CanVec, OpenStreetMap
 3. Background: NRCan CanVec



Project Location
 Stephenville
 NL

Prepared by MB on 2024-01-22
 QR by AW on 2024-01-22

Client/Project
 World Energy GH2
 Project Nujjo'qonik

121418050_022

Figure No.
2.2

Revised Turbine Layout of Pine Tree / Table Mountain due to Proximity to Stephenville Airport

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Implication for the Environmental Assessment

As refinement in the turbine layout has only involved removal of turbines that were previously assessed, the assessment contained in the EIS is now considered conservative. As a result, this Project refinement does not change the conclusions of the environmental assessment.

Implication for the Planned Mitigation and Follow-Up and Monitoring

As the revised layout of the Port au Port Wind Farm is a reduction in the quantity of installed wind turbines, it does not introduce new or different Project activities or components and the purpose of the layout change is to avoid constraints, there are no changes to planned mitigation measures or planned follow-up and monitoring as a result of this revised layout.

2.5.2 Transmission Line Port au Port Isthmus Crossing

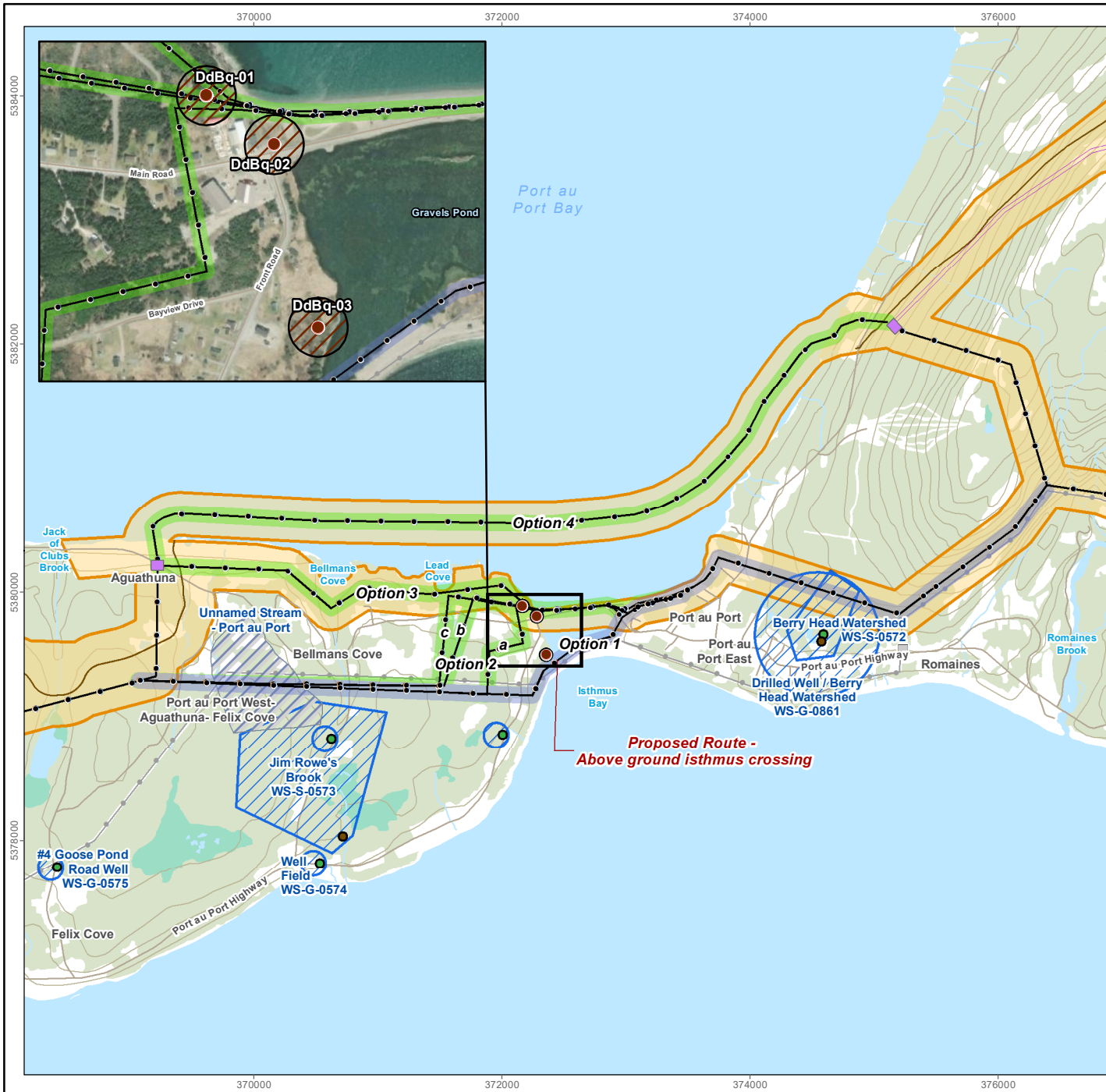
Description of Change

The EIS included two options for the crossing of the transmission line from the Port au Port Peninsula to the mainland: an above ground, onland option; and a subsea cable. Both options were assessed in the EIS. WEGH2 has since met with Newfoundland Power (NFP). This has resulted in alternatives (Figure 2.3) to the proposed option for the 230kv TL crossing the Port au Port isthmus. In order of preference, the alternatives are:

1. Option 1: Preferred route (follows the existing transmission line right-of-way)
2. Option 2a: Alternate Route (follows the existing transmission line right-of-way for a portion of the route)
3. Option 2b: Alternate Route (follows the existing transmission line right-of-way for a portion of the route)
4. Option 2c: Alternate Route (follows the existing transmission line right-of-way for a portion of the route)
5. Option 3: Alternate Route (original preferred route across Port au Port isthmus)
6. Option 4: Alternate Route (subsea cable – this option is unlikely)

Options 1 and 2 are all above ground options, similar to the preferred option in the EIS. With respect to Figure 2.3, note that the substation will only be required if the subsea route (Option 4) is selected. Option 1 also shows the transmission line route overlapping an unnamed Protected Public Water Supply Area (PPWSA) (Figure 2.3). The transmission line will span this area, so there will be no physical footprint within the PPWSA. Option 2 has three slight variations in its routing.

V:\1214\active\1214-1723303_data\gis_data\gis_cad\gis_data\mapping\mxd\general\IEIS_Amendment\Ch02_Refinements\121418050_021_Fig2.3_PaP_Interconnection.mxd Revised: 2024-01-26 By: mblackwood



Stantec

Proposed Project Features

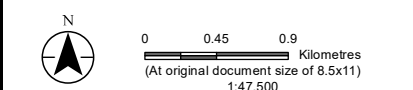
- Transmission Line 230 kV
- Port au Port Interconnection
- Proposed Route
- Alternate Route
- Collector Line
- Access Road
- Substation
- Project Area

Other Features

- Registered Archaeological Site
- 50m Buffer of Archaeological Site

Legend

- Substation
- Wellhead
- Intake
- Transmission Line, Existing
- Road
- Contour (20 m)
- Watercourse
- Waterbody
- Protected Public Water Supply
- Potential Public Water Supply
- Wetland
- Forested Area



Notes

- Coordinate System: NAD 1983 CSRS UTM Zone 21N
- Data Sources: World Energy GH2, NRCan CanVec, OpenStreetMap
- Background: NRCan CanVec Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community



Project Location: Stephenville, NL
 Prepared by MB on 2024-01-22
 QR by AW on 2024-01-22

Client/Project: World Energy GH2
 Project Nujjig'qonik

Figure No. **2.3**

230kv TL Options Crossing the Port au Isthmus

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Implication for the Environmental Assessment

If Options 1 or 2 are selected, there may be some implications with respect to the effects assessment completed in the EIS for various Valued Environmental Components (VECs). Both Options 1 and 2 present shorter routes adjacent to / within an existing disturbed area (i.e., an existing right-of-way (ROW) for an NFP transmission line). Installing WEGH2's 230kv TL crossing the Port au Port isthmus in this ROW will result in less disturbance to the landscape than Option 3 (original preferred route). These two options are outside the Project Area that was assessed in the EIS; however, it is expected that the terrestrial VECs (i.e., Vegetation and Wetlands, Avifauna, Bats and Other Wildlife) will experience similar (or less) adverse effects as assessed in the EIS for Option 3. WEGH2 will complete appropriate field surveys in the new crossing areas as required by permitting.

It is not anticipated that Options 1 or 2 will change the effects assessment completed in the EIS for the Atmospheric Environment or Acoustic Environment VECs. The southern routing of Options 1 and 2 is in an existing ROW and further from residences. This is a more favourable routing with respect to potential adverse effects on receptors than Option 3 that passes in close proximity to communities and roadways. No changes to the effects predictions made in the EIS for these VECs are anticipated.

The effects assessment completed in the EIS for VECs associated with the socio-economic environment are not anticipated to change if Options 1 or 2 are selected. By expanding an existing ROW, WEGH2 anticipates fewer land and resource use conflicts than with Option 3. Nor are changes to the effects assessments for the Human Health and Quality of Life, Communities, Employment and Economy or Indigenous Fisheries VECs anticipated because of a southern rerouting of the transmission line.

There are three registered archaeological sites situated near the isthmus of the Port au Port Peninsula (Figure 2.3). The final selected route will need to consider the location of these sites in consultation with the Provincial Archaeology Office (PAO). As noted in the EIS, measures to mitigate potential adverse effects on heritage and cultural resources include requirements and associated permits issued by the PAO. The Environmental Protection Plan will also include a Heritage and Cultural Resources Protection Plan that will outline mitigation for potential adverse effects on heritage resources resulting from unplanned discovery.

Implication for the Planned Mitigation and Follow-up and Monitoring

If Option 1 or 2 is selected, WEGH2 will complete appropriate field surveys along the transmission line route through the isthmus to inform permitting. Due to limited changes in the effects assessment, no new mitigation measures are anticipated because of either Option 1 or 2.

2.5.3 Marine Landing Site

Description of Change

A marine landing site at West Bay is no longer being considered for this Project. The Transportation Impact Study (TIS) appended to the EIS (Appendix 2-C) assumed that some of the turbine sites on the Port au Port Wind Farm would be accessed through the West Bay landing site and some through the

Project Nujio'qonik: Amendment to the Environmental Impact Statement

Aguathuna marine landing site. The TIS (Appendix 2-K) has been updated to reflect turbine components being delivered only at the Aguathuna landing site. The TIS originally assumed that the components for the Table Mountains (referred to as Port au Port East in the EIS) would be delivered to the Port of Stephenville and then by road to the turbine locations. Due to bridge weight restrictions, WEGH2 now plans to transport turbine components to the Table Mountains site (referred to as Port au Port East in the EIS) from the Aguathuna marine landing site. This will require components associated with these turbines to cross the isthmus. The updated TIS also reflects this change.

Implication for the Environmental Assessment

Removal of the marine landing site at West Bay in general makes the assessment in the EIS more conservative as it originally assumed the need for infrastructure development and activity at two locations. The Aguathuna marine landing site is also located at a previously disturbed location (Aguathuna mine site) and selection of this site will reduce interference with local traffic. The requirement to use the Aguathuna marine landing site for transportation of components to the Table Mountains site (referred to as Port au Port East in the EIS) would create the potential for effects on traffic crossing the isthmus. This has been addressed in the revised TIS (Appendix 2-K). For the delivery of oversized and overweight components, it is estimated that six round trips per day will be made between the Aguathuna site and Table Mountains site (referred to as Port au Port East in the EIS) during the construction season. When trucks are making turns at the intersections, traffic will need to be stopped for up to 5 minutes to allow a truck to pass. An approved traffic management plan with appropriate traffic control will be in place for each intersection.

For the delivery of other construction materials and transportation of workers, up to 50 daily round trips will be added to the road network, which will not bring noticeable impact to the road network and is within the design capacity of the road network.

Implication for the Planned Mitigation and Follow-up and Monitoring

Removal of the West Bay marine landing site does not change planned mitigation and monitoring presented in the EIS. The requirement to use the Aguathuna marine landing site for transportation of components to the Table Mountains site (referred to as Port au Port East in the EIS) will create the potential for effects on traffic crossing the isthmus, as described above. The approved traffic management plan will provide the appropriate traffic controls to mitigate effects on traffic and road networks in the area.

2.5.4 Accommodations Camps

Description of Change

In the EIS, the accommodations camp was identified as being able to accommodate approximately 1,200 to 1,500 people. The camp location is proposed within the Stephenville airport perimeter, in the eastern part of the airport grounds in an area that is currently unoccupied.

Project Nujio'qonik: Amendment to the Environmental Impact Statement

Through further consultation with the Town of Stephenville, it has been determined that the town's existing wastewater treatment facility does not have the capacity to accommodate a camp of 1,200-1,500 people. WEGH2 will therefore install its own waste treatment facility at the camp site within existing zoning and permitting requirements. Solids will be removed by a local licensed handling facility for disposal at an approved location.

While the location of the accommodations camp for the Codroy Wind Farm construction has not been determined, WEGH2 is committed to community consultation during the site selection process and attaining the necessary approvals and permits once the location has been determined.

Implication for the Environmental Assessment

While the Stephenville accommodations camp waste treatment facility does introduce a new or different Project component, the purpose of the change is to avoid overtaxing the Town of Stephenville's municipal water control system. As the water treatment facility will be installed within existing zoning and permitting requirements, there are no changes necessary to the environmental effects assessment.

Implication for the Planned Mitigation and Follow-up and Monitoring

The new water treatment facility will be installed within existing zoning and permitting requirements and there are no changes to planned mitigation measures or planned follow-up and monitoring as a result of this change.

2.5.1 Schedule

Description of Change

A schedule update is under development as part of the FEED Readiness Assessment process currently underway. Key factors under review include Long Lead Item availability / delivery updates and Offtaker delivery requirements for initial product, with a focus on completion of infrastructure to import new green fuels at commercial scale. Updating the Project schedule prior to the start of FEED is a standard and important step in finalizing the FEED Readiness Assessment. The schedule update will be ready for release on or about April 15, 2024, which is the targeted date for FEED start.

Implication for the Environmental Assessment

As the residual effects assessment presented in the EIS was not reliant on the start date of construction, a schedule update will not affect the conclusions presented in the EIS. WEGH2 will complete required field studies prior to the start of construction in consultation with regulators and construction activities will be completed in consideration of regulatory environmental timing windows (e.g., in-water works).

Implication for the Planned Mitigation and Follow-up and Monitoring

As the schedule update will not change the planned Project components and activities, there is no change to planned mitigation and follow-up and monitoring.

2.5.2 Port au Port Batch Plant Locations

Description of Refinement

While the need for concrete batch plants were identified and considered in the EIS as a component of the Project, specific locations were not identified. Currently, two locations for batch plant setup on the Port au Port Peninsula have been identified (Figure 2.4), reducing haul distances and potential for interaction with local communities. The first is directly adjacent to the Aguathuna laydown site (369,000 m E; 5,379,000 m N), in an existing brownfield quarry, situated adjacent a major 'kickoff' point for the Port au Port wind farm construction. The second is in the interior of the Port of Port wind farm (352,000 m E; 5,386,000 m N), well distanced from existing public water supply areas, roads, communities or structures. Any number of wind turbine laydown sites in the interior of the Port of Port wind farm would also provide for good batch plant setup location. Refer also to the response to WRM 10 in Chapter 4 of this EIS Amendment for additional discussion on the concrete batch plant locations.



Figure 2.4 Proposed Port au Port Batch Plant Locations

Implication for the Environmental Assessment

As the proposed Port au Port batch plant locations do not introduce new or different Project activities and components, and given their siting does not change any planned mitigation identified below, there are no changes to the environmental effects assessment.

Implication for the Planned Mitigation and Follow-up and Monitoring

The following mitigation measures were identified in the EIS:

- 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.
- The Environmental Code of Practice for Concrete Batch Plant and Rock Washing Operations, 1992 will be adhered to during concrete production activities.
- 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.
- Rinsing activities will be carried out at the site of the concrete batch plant, except rinsing of the chute and applicable concrete placement equipment.

In addition, the following new mitigation measures will be applied to the batch plants:

- Batching plants will not be installed within 500 m of a residence, water course, wetland or other sensitive areas.
- No water containing contaminants from the batching operation will be released to the environment.

2.5.3 Wastewater Discharge Pipe

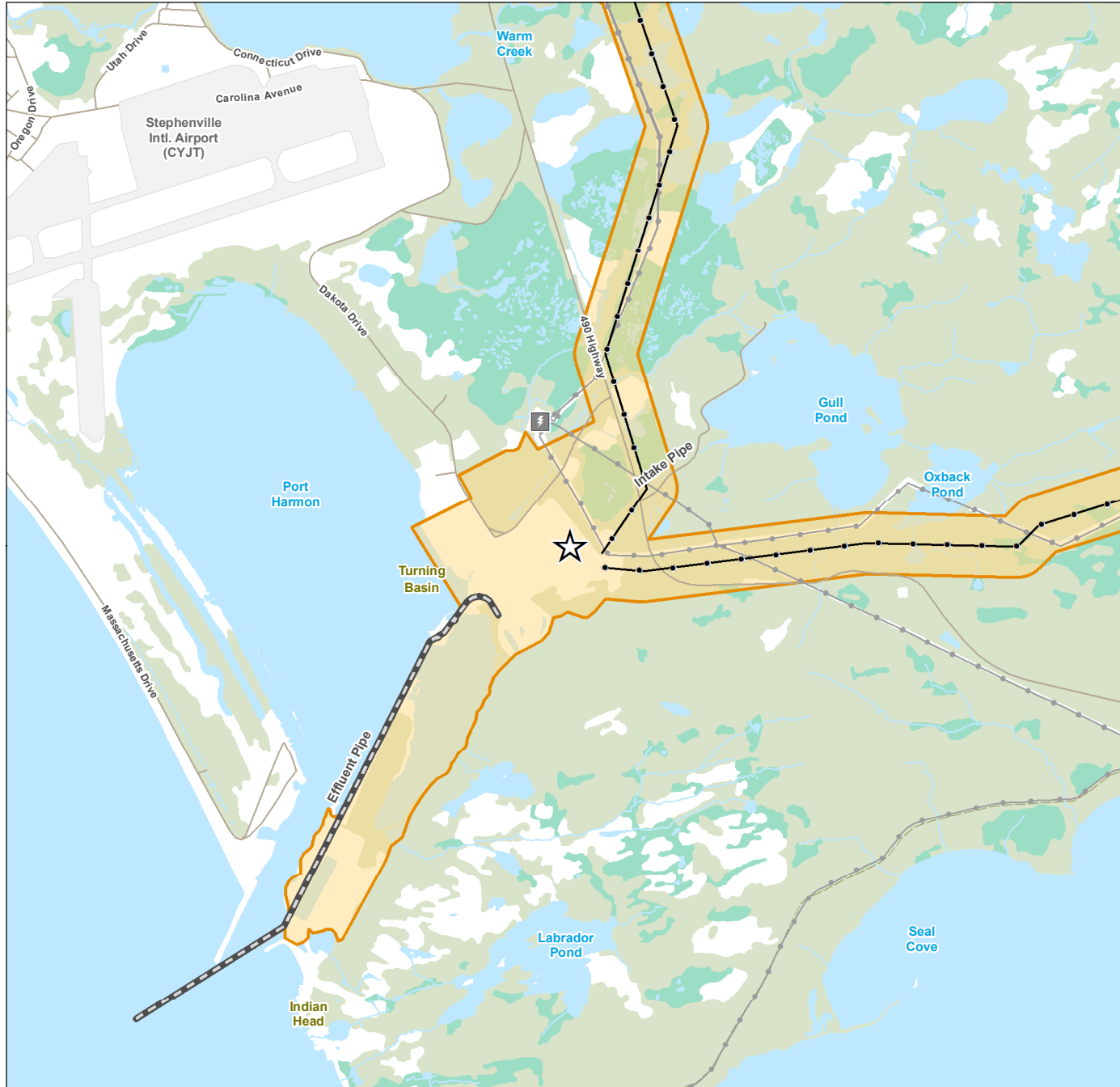
The existing effluent discharge pipeline from the former Abitibi operation has been deemed unsuitable, so will need to be replaced. A new wastewater discharge line will therefore need to be placed along the same route, with discharge at the same location (Figure 2.5). The land-based portions of the pipeline will be buried in a trench. The pipeline spanning the first water crossing will be laid on the sea floor using appropriately designed matting/weights. The final outfall from the shoreline will also be laid on the sea floor using appropriately designed matting/weights.

Implication for the Environmental Assessment

Placement of the effluent discharge pipe on the seafloor has the potential to affect the benthic environment through the temporary resuspension of fine sediments or covering of a small benthic area located directly under the effluent discharge pipeline. Once final design is completed, and the placement location is confirmed, WEGH2 will share details on the proposed effluent discharge pipe with DFO to determine if a Letter of Advice or authorization will be required under the *Fisheries Act*. Depending on the design and placement of the pipeline, the pipeline has the potential to create new habitat and result in a "reef effect". Local fish harvesters will be consulted on the plan to replace the discharge pipe.

Based on the above information and planned approach for the effluent discharge pipe Letter of Advice or authorization, the replacement of the existing pipeline with a new pipeline will not change the residual effects conclusions as provided in the EIS with respect to the marine environment.

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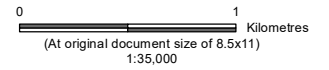


Proposed Project Features

- Hydrogen / Ammonia Plant Location
- Transmission Line 230 kV
- Pipeline⁴
- Project Area

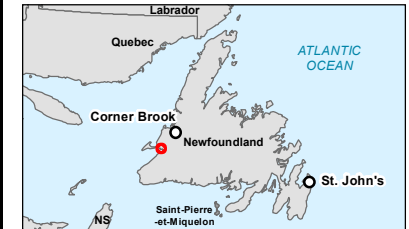
Other Features

- Electrical Generation, Existing
- Transmission Line, Existing
- Road
- Resource Road / Trail
- Watercourse
- Waterbody
- Wetland
- Forested Area



Notes

1. Coordinate System: NAD 1983 CSRS UTM Zone 21N
2. Data Sources: World Energy GH2, NRCan CanVec, OpenStreetMap
3. Background: NRCan CanVec
4. Final alignment will be determined by FEED modelling



Project Location: Stephenville, NL
Prepared by MB on 2024-01-25

Client/Project: World Energy GH2, Project Nujjo'qonik
121418050_030

Figure No. **2.5**

Location of Replacement Wastewater Discharge Pipeline

Implication for the Planned Mitigation and Follow-up and Monitoring

Once final design is completed, and the placement location is confirmed, information will be submitted to DFO for their review and determination / authorization under the Fisheries Act. Site-specific mitigation along with any follow-up and monitoring requirements will be presented, discussed and approved as part of the information packaged presented to DFO and will be outlined in DFO's Letter of Advice or authorization.

2.6 Additional Project Planning Considerations

Appendix 26-A of the EIS contains a consolidation of the mitigation and monitoring measures committed to by WEGH2 in the EIS. Table 2.4 contains additional requests for mitigation and monitoring based on government comments during review of the EIS and additional mitigation commitments by WEGH2. These additional requests for mitigation and monitoring measures will form the basis of discussion with the relevant regulatory authorities in the development of the impact, mitigation and monitoring plans to identify the best approach to complying with the provincial and federal requirements. WEGH2 understands that NLDDFA- Wildlife Division are developing guidelines to mitigate effects of wind farms on bats, which may add or change the recommendations for mitigations received during the EIS review. Further engagement is therefore required.

Table 2.4 EIS Amendment Project Planning Considerations

WEGH2 Action	Commitment Description
General Commitments	
Mitigation	Batching plants will not be installed within 500 m of a residence, water course, wetland or other sensitive areas.
Engagement with Regulator	The Project layout has been designed to maintain buffers around known sensitive habitats, species, and historic resources. The possibility remains that additional sensitive habitats or species may be discovered during construction. Once identified, WEGH2 will then consider the options for mitigation of effects, including avoidance. WEGH2 will then consult regulatory authorities on how best to mitigate effects if they cannot be completely avoided by micro-siting the infrastructure.
Design and Mitigation	Buffer width will be reviewed and reduced to the extent appropriate once micro-siting of Project components is completed. However, micro-siting will continue during construction as a mitigation to avoid sensitive habitats and species, if feasible.
Commitments related to Fisheries, Fish and Fish Habitat and Water Resources	
Monitoring	In response to concerns from fishers in the area, and the request from FFA, WEGH2 will develop a noise and vibration monitoring program as part of the EPP for on land Project components.
Engagement with Regulators	WEGH2 will consult with Newfoundland and Labrador Department of Fisheries Forestry and Agriculture (NLDDFA) and Fisheries and Oceans Canada in the development of the Environmental Protection Plan (EPP) to include best management practices to avoid introduction of Aquatic Invasive Species

Table 2.4 EIS Amendment Project Planning Considerations

WEGH2 Action	Commitment Description
Mitigation	WEGH2 will include a reduced vessel speed requirement for Project related vessels as part of the EPP.
Mitigation	Local fish harvesters will be engaged throughout all stages of the Project. WEGH2 will investigate the use of mitigations to reduce the noise from pile driving.
Engagement	WEGH2 is committed to ongoing engagement with FFAW, NLDDFA and Fisheries and Oceans Canada (DFO) during the design of the marine landing site in Aguathuna. Site specific fish and fish habitat information for the marine landing sites and the dredge and dredge disposal sites will be provided to determine whether a <i>Fisheries Act</i> Authorization is required, following completion of the environmental assessment process.
Engagement	As it relates to the submarine transmission cable, should WEGH2 elect this secondary option for transmission of the generated electrical power from the Port au Port Peninsula, in lieu of the overhead line crossing, WEGH2 commits during detailed design, to work with the offshore exploration leaseholder towards selecting a final routing of the submarine cable that avoids conflict and interference with the leaseholder's planned exploration program.
Mitigation	No impacted water will be released from batching operations.
Engagement with Regulators	The Offsetting Plan can be provided as required by the NLDDFA - Wildlife Division and in consultation with DFO.
Mitigation	The Project will maintain a register of water crossings complete with key risks with respect to interactions and potential impact upon fish and other wildlife resource users, and communities. This register will be reviewed annually and updated with inspection observations and stakeholder feedback to inform the inspection process and develop maintenance plans.
Mitigation	Identified condition issues for water crossing will be contained in a report to be reviewed by Maintenance Manager / senior management, prioritized and incorporated into an ongoing water crossing maintenance plan. Additional measures will include a mechanism to initiate inspection after a significant weather or geo event (e.g., heavy rainfalls, landslides). and signage at water crossings aimed at other road users detailing contact information where other users can log concerns, observations and alerts pertaining to water crossing conditions.
Mitigation	At the end of the construction phase, WEGH2 will use as-built crossing data for the purposes of generating a risk-based asset integrity plan that includes regular inspections (by risk-ranked priority wherein culverts and crossing presenting high risk are inspected more frequently) and preventative maintenance measures (e.g., removal of obstacles, placement of armour stone). Culvert inspections will be documented using a geo-spatial referenced platform, allowing for viewing of latest inspection in WEGH2 Geographic Information Systems (GIS) platform.
Mitigation	At the end of the Project, and post-decommissioning, culverts will be removed from fish-bearing water bodies to facilitate the passage of fish once the inspection and maintenance program has ended.

Table 2.4 EIS Amendment Project Planning Considerations

WEGH2 Action	Commitment Description
Engagement with Regulator	WEGH2 will work with DFO to determine if a <i>Fisheries Act</i> Authorization is required and incorporate the results of the 2023 field studies and any new data requirements in the request for review applications applicable. WEGH2 will work with DFO to identify site-specific (i.e., Atlantic salmon rivers) or component-specific (i.e., watercourse crossings) mitigation during the permitting process.
Monitoring	Potable water will be provided to the temporary work camp in Stephenville via two new groundwater wells. Non-domestic well permits are required to drill new municipal wells. Once installed, water chemistry samples from the monitoring wells will be analyzed at least bi-annually to ensure safe drinking water. Samples will also be analyzed annually for perfluorooctane and perfluorooctanoic acid.
Mitigation	WEGH2 has excluded the siting of wind turbines within watersheds used for public drinking water systems. The re-design of the Port au Port Wind Farm layout will remove turbines from the proposed expanded area of the Rouzes Brook Protected Public Water Supply Area (PPWSA). Turbines will also be excluded from the Cointre’s Brook PPWSA.
Monitoring	In addition to the chemical changes in water quality, changes in physical parameters (e.g., temperature, conductivity, total suspended solids [TSS], and turbidity) will be monitored as part of the surface water monitoring program.
Engagement with Regulator	WEGH2 will consult with the Water Resources Management Division during permit application processes to confirm compliance with applicable requirements of the <i>Water Resources Act</i> .
Design and Mitigation	Project activities in the PPWSAs (i.e., construction, operation and decommissioning and reclamation of the 230 kV transmission lines in the Port au Port East, Stephenville, Stephenville Crossing, and St. George’s PPWSAs) will be managed in accordance with the Policy for Land and Water Related Developments in the PPWSAs (NLDECC 1999), as well as through application of best practices in accordance with the Water Resources Management Division’s Environmental Guidelines for General Construction Practices (2018) and other standard mitigation measures described in Section 9.4 of the EIS.
Mitigation and Engagement with Regulator	Where ground truthing of the PPWSAs is required, WEGH2 will do so before development is undertaken adjacent to the watershed. WEGH2 will consult with Water Resources Management Division during permit application processes to confirm compliance with applicable requirements of the <i>Water Resources Act</i> , including policy guidelines established under section 39 of the Act (e.g., Policy for Land and Water Related Developments in Protected Public Water Supply Areas).
Mitigation	WEGH2 intends to manage rising water levels in Noel’s and Muddy Pond by allowing the water level to rise about 0.60 to 0.70 m above the current normal pond level and to remove the fill in the outflow channel allowing the pond to be lowered about 0.45 to 0.5 m below its current normal level. WEGH2 has committed to automatically lowering the pond level when a major precipitation or snow melt event starts as a mitigation measure.

Table 2.4 EIS Amendment Project Planning Considerations

WEGH2 Action	Commitment Description
Design	For permanent access roads, which will be the majority of what is constructed, WEGH2 will design for a one in 25 year (1/25 yr) event, while for high risk areas, the merit of a higher return period will be evaluated on a case-by-case basis using available data and considering downstream infrastructure. For temporary roads required for construction (e.g., access a quarry, or temporary laydown area), these would be constructed to the 1/10 yr event.
Engagement with Regulator	Details on best management practices to protect watercourses and wetlands will be developed in consultation with the Water Resources Management Division, NLDDFA, and DFO.
Monitoring	Water levels and flow monitoring in the industrial water supply ponds will be included in the Surface Water Monitoring Plan.
Mitigation and Engagement with Regulators	Once facility process streams are finalized and an accurate characterization of the solids is available, Water Resources Management Division and Pollution Prevention Division will be provided with details regarding how the reverse osmosis (RO) membranes will be cleaned and the plans for that waste stream will be developed for the EPP, and the Waste Management Plan updated in consultation with applicable authorities.
<i>Commitments Related to Vegetation and Wetlands</i>	
Mitigation	WEGH2 received data providing critical habitat for Mackenzie's sweetvetch, low northern rockcress, and woolly arnica on the Southern Limestone Barrens immediately prior to submitting this EIS Amendment. WEGH2 will review the data, work with NLDDFA – Wildlife Division, and it will be considered during final Project design.
Mitigation and Engagement with Regulator	Additional mitigation measures and rehabilitation strategies for affected SAR will be discussed with the NLDDFA - Wildlife Division during the development of the SAR IMMP.
Engagement with Regulator	Benefits of additional refined mapping of barrens, separating community types, will be evaluated and discussed with the NLDDFA-Wildlife Division. WEGH2 will also work with the NLDDFA-Wildlife Division to develop the SAR IMMP and additional mitigation measures to address concerns of impacts to this land cover type.
Engagement with Regulator	WEGH2 will work with the NLDDFA - Wildlife Division to identify additional technically feasible mitigation measures to reduce effects and promote post-disturbance wetland function recovery.
Engagement with Regulator	FFA's comments (FFA 52) on the rare plant mitigation proposed in the EIS will be addressed during development of the SAR IMMP
Mitigation	To offset the loss of productive forested land after installation, excess cleared area will be rehabilitated by reforestation/afforestation activity with the preparation of the area for suitable growing conditions and planting appropriate tree species.

Table 2.4 EIS Amendment Project Planning Considerations

WEGH2 Action	Commitment Description
<i>Commitments Related to Avifauna</i>	
Monitoring	A draft radar study plan has been prepared which considered contents of the ECCC guidance documents (“Wind Turbines and Birds: A Guidance Document for Environmental Assessment” (EC 2007a), “Recommended Protocols for Monitoring Impacts of Wind Turbines on Birds” (EC 2007b) and ECCC-CWS (Atlantic Region) – Wind Energy and Birds Environmental Assessment Guidance Update (2022)). This bird/bat radar study plan will be incorporated into the Avifauna Impacts Mitigation and Monitoring Plan (IMMP) as specifically required in Section 7.2.8.3 of the EIS Guidelines.
Monitoring	Avifauna acoustic and radar studies to be completed in 2024, including the Codroy Wind Farm area.
Monitoring	For 2024, a second season of avifauna migration surveys is planned for the Port au Port peninsula and a first year of surveys is planned for the Codroy Area.
Monitoring	WEGH2 is committed to completing additional raptor surveys in Port au Port and Codroy.
Mitigation and Engagement with Regulator	WEGH2 will take measures to avoid the incidental take of migratory birds, nests, and eggs throughout all Project phases. An adaptive management approach will be applied to the development of the Avifauna IMMP, in consultation with ECCC.
Mitigation and Monitoring	WEGH2 will incorporate ECCC recommended mitigation measures (ECCC26) into the Avifauna Impact, Mitigation, and Monitoring Plan. In addition, WEGH2 will maintain a 300 m setback from heron colonies during the active season (April 1 to 15 August) and avoid high disturbance activities (e.g., blasting) within 1 km of heron colonies during active season. Surveys completed in 2023 and additional surveys planned for 2024 will survey for locations of heron nest colonies within and adjacent to the Project Area.
Monitoring	WEGH2 is committed to post-construction monitoring and will amend the plan to include carcass surveys of areas where transmission lines intersect migration corridors, and where there may be higher potential for collisions.
Monitoring	ECCC recommends that a post-construction mortality monitoring program be established which will monitor collisions with other infrastructure such as transmission lines. WEGH2 is committed to a post-construction monitoring plan which will be adapted to include the requested additional infrastructure.
Monitoring	WEGH2 is committed to amending the mitigation measures and post-construction monitoring plans to further consider the effects of the Project on low-altitude avian movements.
Mitigation	WEGH2 is committed to identifying areas where large numbers of birds congregate, and areas where collisions risks are elevated. Mitigation measures for these collisions are discussed in Section 13.4 (Avifauna, Mitigation Measures) of the EIS.

Table 2.4 EIS Amendment Project Planning Considerations

WEGH2 Action	Commitment Description
Engagement with Regulator	Environment and Climate Change Canada noted “When obstacles are added in the airways in areas where they previously did not exist (e.g., power lines over the treeline), habitat is being fragmented and lost “. To mitigate the potential impacts, WEGH2 is paralleling lines with existing infrastructure. The installation of bird deterrents (e.g., flappers) in areas with regular bird movements or near sensitive habitats can be discussed during development of the IMMP.
Monitoring	Weather will be monitored and routine (non-emergency) flaring will be scheduled to avoid migration periods and to avoid periods with fog, rain, or low cloud ceiling. During spring and fall migration, at dawn after flaring events (non-routine, emergency) or nights with fog, rain, or low cloud ceiling, searches for grounded birds will be conducted at the hydrogen/ammonia production and storage facilities, especially below and around the flare stack. The search effort will be designed and documented, and the results of searches reported in accordance (as applicable) with the ECCC document Guidance for Developing Systematic Stranded Bird Survey Protocols for Vessels and Platforms (ECCC 2021).
Mitigation	WEGH2 agrees that mitigation to reduce impacts related to light attraction should be included for all phases of the Project. Mitigation for light attraction will be developed for all Project phases within the Avifauna Impacts Mitigation and Monitoring Plan.
Commitments Related to Bats	
Engagement with Regulator	NLDFFA- Wildlife Division noted “A mitigation measure should be added to avoid removal of trees until after the bat active season wherever possible (as required for avifauna), and any large diameter trees (>25 cm Diameter at Breast Height) must be inspected for bat use visually and through emergence counts prior to their removal.” WEGH2 will consult with NLDFFA-Wildlife Division on the noted mitigation measure as part of development of the SAR IMMP to be submitted for review prior to Project construction at that site.
Engagement with Regulator	If tree removal cannot be avoided during the bat active season, large diameter trees (>25 cm Diameter at Breast Height) must be inspected for bat use visually and through emergence counts prior to their removal.
Engagement with Regulator	WEGH2 understands Newfoundland and Labrador Department of Fisheries, Forestry, and Agriculture (NLDFAA) - Wildlife Division is developing mitigation guidelines for bats, which we anticipate will be applied to this project.
Engagement with Regulator	NLDFFA- Wildlife Division suggested “re-wording of last sentence of the second paragraph as shown in bold font: ‘Standard curtailments will be used at night from July through September, and pending outcomes of post-construction mortality monitoring, adaptive management may include an increase in cut-in speeds to reduce bat fatalities.’ WEGH2 acknowledges this request and will further consult with Newfoundland and Labrador Department of Fisheries, NLDFFA-Wildlife Division during development of the SAR IMMP.
Engagement with Regulator	If a bat hibernaculum is discovered during blasting activities, all activities must halt immediately and WEGH2 will contact the Wildlife Division.

Table 2.4 EIS Amendment Project Planning Considerations

WEGH2 Action	Commitment Description
Engagement with Regulator	Prior to decommissioning, infrastructure will be checked to see if bats are presently using the infrastructure. Any bat exclusions occurring between May 1 and Aug 31 require a permit under the Newfoundland and Labrador Endangered Species Act and provincial Best Management Practices.
Engagement with Regulator	For future bat monitoring data, raw acoustic files with assigned manual ID’s will be provided to Jessica Humber (jessicahumber@gov.nl.ca) and endangeredspecies@gov.nl.ca .
Commitments Related to Other Wildlife	
Engagement with Regulator	WEGH2 will work with applicable regulatory agencies to confirm appropriate buffers for yellow-banded bumble bee nests as well as other potential mitigation measures (e.g., measures related to vegetation management).
Engagement with Regulator	WEGH2 is committed to mitigating potential effects on wildlife during Project construction and operation. Mitigation and monitoring protocols for wildlife, including marten, will be included in the Environmental Protection Plan(s) which will incorporate mitigation measures and monitoring commitments in the EIS and this EIS Amendment. The approach to monitoring marten will be developed in consultation with applicable regulators and will be submitted for review prior to Project construction, and WEGH2 will work with regulators to confirm appropriate buffers for marten dens.
Mitigation	WEGH2 will work with applicable regulatory agencies to confirm noise / disturbance thresholds and appropriate site-specific buffers for relevant species/species groups and habitat features (e.g., dens, nests), which will be incorporated into mitigation and monitoring plans.
Mitigation	The on-site environmental team will be notified if caribou and other mammal SAR / SOCC 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.
Commitments Related to Land Use and Protected Areas	
Monitoring and Engagement	While access will not be restricted during periods of safe operations, WEGH2 will be monitoring access and use of the wind farm areas through various security and surveillance methods. WEGH2 is committed to responsible stewardship of the land it has been granted access to, and will work with local stakeholders through the Community Liaison Committee and Indigenous partnerships to monitor use and help protect the land.
Mitigation	During detailed design, WEGH2 commits to work with the lease holder of Production Lease (2002-01(A) Energi Oil Inc. (“Energi”), towards final siting of these wind turbines to avoid conflict and interference with Energi’s planned development of the production lease. World Energy GH2 (WEGH2) will negotiate a shared-use plan with Energi Oil Inc., within the parameters of Energi’s mineral rights, where there is an approximate 5.3 km ² overlap to ensure an appropriate setback between any wind turbines and associated oil and gas infrastructure.

Table 2.4 EIS Amendment Project Planning Considerations

WEGH2 Action	Commitment Description
Mitigation	WEGH2 will work with mining / quarry operators to determine if blasting mats or other mitigative measures will be required during mining operations within or adjacent to the PA to protect Project infrastructure.
Mitigation	In relation to proximity of the Project to the Lower Cove mining operation and associated expansion areas of mineral tenure, there may be a requirement for setback consideration, depending on turbine placement.
Mitigation	Protection buffers will be mutually established between WEGH2 and the Lower Cove mining operation, including the establishment of appropriate setback distances to reduce effects on mining operations and WEGH2 Project infrastructure.
Mitigation	WEGH2 will consult with Natural Areas Program, Policy, Planning, and Natural Areas Division prior to the start of construction of a transmission line through Bras Mort Bog proposed protected area.
Mitigation	WEGH2 will consult with Natural Areas Program, Policy, Planning, and Natural Areas Division during development of environmental effects mitigation and monitoring plans.
Engagement	WEGH2 will consult with appropriate regulators, i.e., Natural Areas Program- Policy, Planning and Natural Areas Division, Department of Environment and Climate Change, and NLDDFA- Wildlife Division, during development of environmental effects mitigation and monitoring plans in relation to Project work that could affect Sensitive Wildlife Areas. These plans will be developed prior to the start of Project construction activities.
Engagement	As part of the implementation of Domestic Woodcutting Consultation Plan, WEGH2 will work with communities to facilitate access to the wood by local residents.
Mitigation	As the System Impact Study is completed, and power purchase agreements begin to form, WEGH2 and NL Hydro will develop new processes to coordinate the respective operations, including emergency response communication protocols.
Engagement with Regulator	WEGH2 will further consult with NLDDFA - Agriculture and Lands Branch in advance of the final Crown lands application for the Project.
Engagement with Regulator	WEGH2 will consult the Geodetic Network shapefiles during detailed design and will contact the GIS and Mapping Division if there is potential for disturbing existing control survey markers.
Engagement with Regulator	WEGH2 will work with Agriculture and Lands Branch during detailed design if the Project footprint requires development within the Crabbe's River Cottage Development Planning Area.
Permitting	WEGH2 will apply for appropriate Municipal Development Permits for any undertaking which fits the definition of Development under the <i>Urban and Rural Planning Act, 2000</i> that is subject to Municipal Approval where a Municipal Planning Area exists with either <i>Interim Development Regulations</i> or a registered <i>Municipal Plan and Development Regulations</i> in legal effect.
Engagement with Municipal Authorities	WEGH2 will engage with local affected Municipal Authorities (Councils) with respect to discretionary use applications and municipal approvals where there is potential for non-compliance with established land use.

Table 2.4 EIS Amendment Project Planning Considerations

WEGH2 Action	Commitment Description
Engagement with Municipal Authorities	WEGH2 will work with local affected Municipal Authorities (Councils) through the process for rezoning or amendment of applicable land use plans and/or development regulations with respect to Project development.
<i>Commitments Related to Employment and Benefits</i>	
Mitigation	<p>WEGH2 will implement standard practices to protect the health and safety of Project employees, including the provision of an Employee Assistance Program for Project personnel.</p> <p>WEGH2 will provide workforce education to address topics such as:</p> <ul style="list-style-type: none"> • Encouragement of healthy lifestyle choices • Sensitivity training • Anti-harassment training • Cultural awareness training
Monitoring	The most recent NOC codes will be used in future Workforce and Employment Plans.
Mitigation	WEGH2 will give consideration to re-skilling or up-skilling opportunities for individuals who may have transferrable skills in the development of the Project Benefits Agreement and the Gender Equity, Diversity and Inclusion Plan in consultation with the NL Department of Immigration, Population Growth and Skills.
Engagement	WEGH2 will work closely with labour associations in the development of the labour relations strategy, which includes a strategy for recruitment and hiring.
Engagement	WEGH2 will contact the Association for New Canadians regarding Intercultural Competency Training.
Mitigation	WEGH2 will consider the Provincial Nominee Program and the Atlantic Immigration Programs in development of its labour relations strategy.
<i>Commitments Related to Traffic Safety and Emergency Response</i>	
Engagement with Regulator	Regulatory and warning road signs will need to be temporarily relocated to a location acceptable to the Department of Transportation and Infrastructure (DTI) to accommodate movement of oversized components. WEGH2 will further consult with DTI on this issue during the permitting phase of the Project when final design is confirmed.
Engagement with Regulator	WEGH2 will work with the Department of Justice and Public Safety and local emergency services in the refinement of the Emergency Response Plan.
Mitigation	The Emergency Response and Contingency Plan for the Project will address the likelihood of occurrence and consequence of severity of accidents and malfunctions for applicable scenarios.

2.7 REFERENCES

- CCME (Canadian Council of Ministers of the Environment). 1999. Canadian Environmental Quality Guidelines for the Protection of Aquatic Life.
- ECCC (Environment and Climate Change Canada). 2021. ECCC-CWS Guidance for Developing Systematic Stranded Bird Survey Protocols for Vessels and Platforms. 3 p. + 3 appendices.
- ECCC-CWS (Environment and Climate Change Canada – Canadian Wildlife Service). 2022. Guidance Regarding Information Needed to Support Assessment of Project Effects on Birds. Environment and Climate Change Canada [draft]. Environment and Climate Change Canada. Version 1.0. 79 pp.
- Environment Canada 2007a. Wind Turbines and Birds: A Guidance Document for Environmental Assessment.
- Environment Canada 2007b. Recommended Protocols for Monitoring Impacts of Wind Turbines on Birds.
- Environment and Climate Change Canada - Canadian Wildlife Service (Atlantic Region). 2022. Wind Energy and Birds Environmental Assessment Guidance Update.
- Newfoundland and Labrador Department of Environment and Climate Change, Water Resources Management Division. 2018. Environmental Guidelines for General Construction Practices. Available online at: <https://www.gov.nl.ca/ecc/files/waterres-regulations-appforms-chapter10.pdf>
- Newfoundland and Labrador Department of Environment and Climate Change, Water Resources Management Division. 1999. Policy for Land and Water Related Developments in Protected Public Water Supply Areas. Available online at: <https://www.gov.nl.ca/ecc/waterres/regulations/policies/water-related/>
- Vale Inco Newfoundland & Labrador Limited. 2008. Environmental Impact Statement: Long Harbour Commercial Nickel Processing Plant: Volume 1: The Project. 174 pp. Available at: <https://www.gov.nl.ca/ecc/files/env-assessment-projects-y2008-1243-05-eis-amend-volume-1.pdf>

3.0 Consultation and Engagement Update

Stakeholder engagement is a key priority for World Energy GH2 LP (WEGH2), as outlined in the Environmental Impact Statement (EIS) in Chapter 4 (Consultation and Engagement). WEGH2 strives to be a good neighbour and corporate citizen, practice sound environment and social governance, and create positive impacts in the communities in which WEGH2 operates. As such, WEGH2 began consultation and engagement with stakeholders early in the process and will continue to engage throughout the life of the Project. Consultation and engagement activities have included: meetings with individuals and groups; drop-in sessions within communities; delivery of presentations to communities and business leaders; operating a Community Office in Stephenville; distribution of printed materials; maintaining a website and social media accounts; sharing a monthly e-newsletter; conducting media interviews; participating in community events and sponsorships; hosting a series of drop-in sessions in the Project area; and hosting a webinar.

A summary of WEGH2's previous stakeholder consultation and engagement during the period from March 2022 – August 2023 is included in Chapter 4(Consultation and Engagement) within the EIS. This chapter of the EIS Amendment provides an update on consultation and engagement that has taken place since submission of the EIS.

In October 2023, WEGH2 welcomed a full-time Indigenous Relations Manager to the team, based in the St. John's office. The new team member is a Mi'kmaw woman, and member of Qalipu First Nation, who grew up in the Project area and has deep knowledge of the people and cultures particular to the area.

WEGH2 has a dedicated stakeholder relations team, overseen by WEGH2's Managing Director and CEO. The full-time stakeholder relations team includes the following roles: Senior Vice-President, Stakeholder Relations and Regulatory Affairs; Director of Marketing Communications; Community Engagement Manager; Community Liaison; and Indigenous Relations Manager. The team also includes a part-time Marketing Communications Coordinator.

WEGH2's Community Information Office, which opened in July 2022, continues to serve as a key point of contact for local residents with questions, comments and/or concerns. The office is located in Stephenville and is managed by two local team members, the Community Engagement Manager and the Community Liaison.

To date, WEGH2's stakeholder consultation and engagement has resulted in the following:

- Comprehensive understanding of stakeholders' priorities, concerns and questions
- Detailed input from Indigenous leaders, including letters of support and memoranda of understanding (MOUs)
- Input from the Town of Stephenville, municipalities and local service districts in the area
- Strong community activity and engagement, including a committee developed to work with WEGH2 that represents the Port au Port Project area
- Growing interest in the Project, particularly in relation to employment, training, and service / supply opportunities

Project Nujio'qonik: Amendment to the Environmental Impact Statement

On Nov. 25, 2023, more than 1,000 community members from the Bay St. George area held a public rally in Stephenville, NL to demonstrate support for the Project. The rally was a remarkable show of support from community stakeholders, including local First Nations groups, students from CNA's green energy programs, local business owners and contractors, and unions.

WEGH2 is committed to continued engagement throughout the life of the project, as outlined in the Public Participation Plan, which was submitted as Appendix 4-A of the EIS:

https://www.gov.nl.ca/ecc/files/env_assessment_y2023_2202_EIS_ap4A-D.pdf and is also available on WEGH2's website: <https://worldenergygh2.com/wp-content/uploads/2023/09/Public-Participation-Plan-Aug-2023.pdf>.

3.1 EIS-Specific Engagement since Submission

In the period immediately following the EIS submission in August 2023, WEGH2's approach was to build awareness of the EIS and ways to access the documents; offer multiple ways to access information (i.e., online, print, Community Office); and offer subject matter experts throughout the public review/comment period to provide project information and answer questions. WEGH2's approach included the following approaches and initiatives:

- The EIS was available online in its entirety: <https://www.gov.nl.ca/ecc/projects/2202-2/>
- E-newsletter updates
- Direct emails to stakeholders
- Social media posts
- Presentations to key groups
 - August 16: Stephenville Town Council
 - Sept. 5: Indigenous community band chiefs
 - Sept. 6: Port au Port mayors and local service district representatives
 - A presentation for Qalipu First Nation (QFN) was also offered but was not scheduled by QFN.
- Community drop-in sessions with subject matter experts from environment, engineering, construction, water, wind, etc. were held at the Stephenville Community Office on the following dates:
 - Sept. 5: 12 – 5 p.m.
 - Sept. 6: 9 a.m. – 5 p.m.
 - Sept. 20, 11 a.m. - 4 p.m.
- Print copies of the EIS were made available at multiple locations:
 - WEGH2's Stephenville Community Office (x2 copies)
 - Public libraries in/near the Project Area (Belanger Memorial School Public Library, Cape St. George Public Library, E. A. Butler School Public Library, Lourdes Public Library, Port au Port Library, St. George's Public Library, Stephenville (Kindale) Public Library, Stephenville Crossing Public Library)

If requests by communities and/or community groups for additional print copies were made, they were either provided or directed to the online and public print copies available (if they resided outside the Project Area).

Project Nujio’qonik: Amendment to the Environmental Impact Statement

In the presentations and community drop-in sessions regarding the EIS, questions from stakeholders largely focused on timelines for construction starting, employment opportunities, service and supply opportunities, and education and training opportunities. Questions regarding EIS topics were related to industrial water usage, wind turbine placement and technical specifications, access road development, and community benefits. Two individuals reached out via email with questions regarding the fishery and how the plant and its operations may affect fish harvesters in the area.

WEGH2 will continue to engage with stakeholders, and to provide information in a responsive, timely manner.

Prior to the submission of the EIS Amendment, WEGH2 shared Project updates with stakeholders in January 2024. WEGH2 aimed to make the EIS Amendment information as accessible as reasonably possible to stakeholders, especially to those who live in the Project Area. WEGH2’s approach was to build awareness of the EIS Amendment and its contents; offer multiple ways to access information (i.e., online, in-person, Community Office); and offer subject matter experts to provide project information and answer questions. WEGH2’s approach included the following initiatives:

- Direct emails to Indigenous and community leaders, as well as local MHAs (with follow-up emails with specific contact) on January 2, 2024 (Email regarding in-person session) and January 5, 2024 (Email regarding webinars)
- Social media posts on Facebook, LinkedIn, and X (formerly Twitter)
- A community drop-in session with subject matter experts from environment, engineering, construction, water, etc. was held at the Stephenville Community Office on January 5, 2024, 11 a.m. to 5 p.m. (48 participants)
- Webinar with subject matter experts from environment, engineering, construction, water, etc. on MS Teams on January 9, 2024, 6 to 7:30 p.m. (74 registrants, 58 participants)
- Radio news coverage, BayFM: January 3, 2024 (news item on air and online)

Concerns expressed to WEGH2 since submission of the EIS are summarized in Table 3.1.

Table 3.1 Update of Concerns Expressed to WEGH2 Since Submission of the EIS

Issue / Concern	Source	Comments for Response
Colonial narrative throughout the EIS	Local band chief (via email)	WEGH2 acknowledges the colonial lens through which the EIS had been viewed and developed, and acknowledges the importance of oral history and culture, particularly in the local area. WEGH2 is committed to Truth and Reconciliation Call to Action #92, and will do better in terms of educating and training our team and contractors in relation to Indigenous histories and cultures.
Capacity of new Romaine’s River Bridge in Port au Port	In-person drop-in session at WEGH2’s Community Office (Stephenville)	Bridge capacity is addressed in the Transportation Impact Study

Table 3.1 Update of Concerns Expressed to WEGH2 Since Submission of the EIS

Issue / Concern	Source	Comments for Response
Reliability of the Project’s transmission line in extreme weather events	In-person drop-in session at WEGH2’s Community Office (Stephenville)	Full consideration of extreme weather events will be given in the design of the transmission infrastructure.
Potential effects on inshore fishery	Community meetings; emails; meeting with fish harvesters	<p>WEGH2 consulted with the Fish, Food and Allied Workers - Unifor Union in December 2023 to discuss the Project and the concerns of its membership (Section 3.2.4). To better understand the extent of local fishery activity and species harvested in the Marine Regional Assessment Area, WEGH2 reviewed community-based coastal inventory data from 1996-2007 for pelagic species, groundfish species and shellfish (Appendix FFA43-A).</p> <p>An assessment of environmental effects on marine commercial fisheries is provided in EIS Section 11.5.3.</p>
Scope and protocol for mitigation and monitoring programs	Community meetings; emails; meeting with fish harvesters	<p>WEGH2 has developed draft annotated tables of contents for:</p> <ul style="list-style-type: none"> • Species at Risk Impacts Mitigation and Monitoring Plan • Groundwater Monitoring Plan • Surface Water Monitoring Plan • Avifauna Impacts Mitigation and Monitoring Plan • Outfitter Effects Monitoring Plan
Noel’s Pond levels and overflow	Emails and meetings with property owner; community meeting	<p>In September 2023, a property owner in the Noels Pond area (Stephenville), inquired regarding water modelling that was included in the EIS. The modelling had overestimated the levels required for the Project, so clarification was required regarding proposed industrial water level parameters, assessment of flood risk in the area, and mitigation measures to minimize the risk of possible peak runoff flooding events. WEGH2 has continued correspondence and meetings with the property owner, contracted the development of an elevation survey of the area, and proposed future analysis and mitigation measures. WEGH2 has met with the concerned party in relation to Noels Pond and has committed to exploring proactive solutions to address these concerns at WEGH2’s cost. WEGH2 will continue to engage with the concerned party and consult regulatory authorities in an effort to reach mutually agreeable solutions.</p>

Table 3.1 Update of Concerns Expressed to WEGH2 Since Submission of the EIS

Issue / Concern	Source	Comments for Response
The Project's overall carbon footprint	Webinar	The objective of the Project is to provide an energy source with a low carbon footprint. GHG emission inventory was provided in the EIS
Project's potential interaction with existing community uses of the former Aguathuna mine site, including a tunnel with culturally significant beams, and a new composting site	Emails with town; community meetings	WEGH2 will meet with the Town of Port au Port West-Aguathuna-Felix Cove to discuss the current and past uses for the site, community concerns, and potential solutions. WEGH2 will continue to consult and collaborate with the town.
Potential for the Project being delayed or cancelled	Phone calls; emails; community meetings	WEGH2's Project timeline is uncertain because it is dependent on government regulations, regulatory processes and approvals.
Note: The following table includes only issues and/or concerns that are NOT duplicative of those documented in Appendix 4-D of the EIS.		

3.1.1 Community Engagement

WEGH2 continues to meet, engage and consult with community leaders, groups and residents. WEGH2's Community Office in Stephenville continues to be an active site for community conversations and meetings. Questions from stakeholders largely focus on timelines for construction starting, employment opportunities, service and supply opportunities, and education and training opportunities. Questions regarding EIS topics have been related to industrial water usage, wind turbine placement and technical specifications, access road development, and community benefits (Table 3.2).

Table 3.2 Engagement with Communities

Date	Location	Stakeholder(s)	Purpose and Focus	Concerns Communicated
14-Aug-23	Email	BSGS LSD	Project update and community projects and priorities	None expressed
16-Aug-23	Online (Video Call)	Stephenville Town Council	Share EIS findings; answer questions	Industrial water usage, hazardous material storage, emergency services coordination
21-Aug-23	Phone call	Codroy Valley Area Development Association (CVADA)	EIS update and the placement of a hard copy in the Library in Codroy Valley	None expressed

Table 3.2 Engagement with Communities

Date	Location	Stakeholder(s)	Purpose and Focus	Concerns Communicated
22-Aug-23	Email	Community leaders; Indigenous leaders; business owners; Port au Port Regional Vibrancy Committee; BSGS Area Development Association; Codroy Valley Area Development Association	Invitation to community drop-in sessions regarding the EIS	None expressed
05-Sep-23	Stephenville, WEGH2 Community Office	Community members in the project area	Community drop-in session with subject matter experts from environment, engineering, construction, water, wind, etc.	Timelines for construction starting; employment opportunities; service and supply opportunities; education and training opportunities; industrial water usage, wind turbine placement and technical specifications; access road development; community benefits.
06-Sep-23	Stephenville, WEGH2 Community Office	Port au Port mayors and local service district representatives	Share EIS findings; answer questions	Wastewater; lobster stocks; surface water; domestic wells; accidents/spills; traffic; harsh weather; restrictions to hunting and woodcutting; access to local roads/wood roads during construction
06-Sep-23	Stephenville, WEGH2 Community Office	Community members in the project area	Community drop-in session with subject matter experts from environment, engineering, construction, water, wind, etc.	Timelines for construction starting; employment opportunities; service and supply opportunities; education and training opportunities; industrial water usage, wind turbine placement and technical specifications; access road development; community benefits.
7-Sep-23	Stephenville, WEGH2 Community Office	Property owner in Noels Pond area	Questions regarding expected water levels in Noels Pond and upstream mitigation measures to prevent flooding	Potential for flooding private property around Noels Pond

Table 3.2 Engagement with Communities

Date	Location	Stakeholder(s)	Purpose and Focus	Concerns Communicated
14-Sep-23	Phone call	Codroy Valley Area Development Association (CVADA)	Project updates and community engagement	None expressed
18-Sep-23	Stephenville, WEGH2 Community Office	Property owner in Noels Pond area	Meeting with subject matter expert and community engagement team regarding the EIS section that focused on modelling that shows expected results for raising the water level in Noels Pond	Potential for flooding private property around Noels Pond
20-Sep-23	Stephenville, WEGH2 Community Office	Community members in the project area	Community drop-in session with subject matter experts from environment, engineering, construction, water, wind, etc.	Timelines for construction starting; employment opportunities; service and supply opportunities; education and training opportunities; industrial water usage; access road development; community benefits.
22-Sep-23	Email	Codroy Valley Area Development Association	Community Vibrancy Fund	None expressed
13-Oct-23	Stephenville, WEGH2 Community Office	Property owner in Noels Pond area	Expected water levels in Noels Pond and upstream mitigation measures to prevent flooding	Potential for flooding private property around Noels Pond
16-Oct-23	Phone call	Town of Kippens	Project updates and details in relation to the town	Plans for roads and water
17-Oct-23	Stephenville, WEGH2 Community Office	Town of Kippens	Project updates and details in relation to the town	Plans for roads and water
01-Nov-23	Phone call	Codroy Valley Area Development Association (CVADA)	GovNL's response to the EIS	Project status and timeline
10-Nov-23	Email	Port au Port Regional Vibrancy Committee (PAPRVC)	Community Vibrancy Fund details and negotiations on hold until the Project has more certainty	Concerns about the Project not proceeding or being delayed

Table 3.2 Engagement with Communities

Date	Location	Stakeholder(s)	Purpose and Focus	Concerns Communicated
10-Nov-23	Email	Codroy Valley Area Development Association (CVADA)	Community Vibrancy Fund details and negotiations on hold until the Project has more certainty	None expressed
14-Nov-23	Phone call	Mayor, Town of Stephenville	Project status	Concerns about the Project not proceeding or being delayed
15-Nov-23	Email	Port au Port Regional Vibrancy Committee (PAPRVC)	Community Vibrancy Fund details and negotiations on hold until the Project has more certainty	None expressed
22-Nov-23	Phone call	Codroy Valley Area Development Association (CVADA)	Project status	None expressed
05-Dec-23	Phone	Port au Port Regional Vibrancy Committee; Town of Cape St. George	Discussed concerns about Reuters article and rumours of a Project delay	Potential impacts of a project delay
08-Dec-23	Email	Town of Port au Port West - Aguathuna - Felix Cove	Crown land application for former Aguathuna mine site	Potential interactions/impacts with community residents
11-Dec-23	Stephenville, WEGH2 Community Office & online	FFAW Unifor representatives and local harvesters	Present Project information, including potential interactions with the marine environment; answer questions	Project's potential effects on fish, lobster and crab; dredging; plant effluent; wind turbine vibrations; turbine proximity to homes
12-Dec-23	Email	Community leaders in Bay St. George area and CVADA	Invitation to holiday social	None expressed
12-Dec-23	Stephenville	BSG Chamber of Commerce	Present Project status update	Potential impacts of a Project delay
13-Dec-23	Email	Town of Port au Port West - Aguathuna - Felix Cove	Crown land application for former Aguathuna mine site	Potential interactions/impacts with community residents

Table 3.2 Engagement with Communities

Date	Location	Stakeholder(s)	Purpose and Focus	Concerns Communicated
15-Dec-23	WEGH2 Community Office, Stephenville	Community leaders and residents; Indigenous leaders; business owners	Holiday social	Potential impacts of a project delay
15-Dec-23	Email	PAPRVC representatives: Town of Cape St. George, LSD of West Bay, LSD of Campbell's Creek	Rumours amongst community members regarding the Project	Rumours regarding a 'deal' with the Town of Stephenville; Western Regional Waste Management gate in West Bay; potential for West Bay marine landing site being removed from Project plans; general Project updates and access to Project information
19-Dec-23	Email	Codroy Valley Area Development Association (CVADA)	Project status and community engagement	None expressed
19-Dec-23	Email	Town of Cape St. George	MET Site A5 construction completed	None expressed
04-Jan-24	Stephenville, WEGH2 Community Office	Community members, mayors, Qalipu Chief Jenny Brake and all local band chiefs in the project area, and business owners	EIS amendment update	Project's potential impact on old mine site in Aguathuna; new Romaine's Bridge load capacity; traffic routing and management; transmission line reliability in extreme weather events; interaction with domestic electricity reliability and rates; Noel's Pond levels and overflow; blasting mitigation; Project monitoring and protocols; access road design; concerns about the potential for the Project being delayed or cancelled
04-Jan-24	Stephenville, WEGH2 Community Office	Property owner in Noels Pond area	Meeting regarding plans in relation to Noels Pond and stream elevation modelling	Potential for flooding private property around Noels Pond

Table 3.2 Engagement with Communities

Date	Location	Stakeholder(s)	Purpose and Focus	Concerns Communicated
09-Jan-24	Online (webinar)	Community members, local band chiefs, business owners, government representatives	EIS amendment update	Potential impacts on residential/domestic water supplies; traffic routing and management; blasting mitigation; carbon footprint; interaction with domestic electricity reliability and rates; access to employment, education and training opportunities; access to service / supply opportunities
09-Jan-24	Email	Town of Port au Port West - Aguathuna - Felix Cove	Crown land application for former Aguathuna mine site	Scheduling a meeting with the council and residents regarding the former mine site
12-Jan-24	Email	Town of Cape St. George	MET Site A5 update	None expressed
19-Jan-24	Email	Town of Cape St. George	MET Site A5 wood distribution	None expressed
22-Jan-24	Email	Property owner in Noels Pond area	Email regarding survey data of the property near the area of concern and proposal for future analysis and mitigation measures	Potential for flooding private property around Noels Pond
22-Jan-24	Email	West Bay (local service district)	Proposed West Bay marine landing site no longer part of Project plan	None expressed
23-Jan-24	Phone call	Town of Cape St. George	Logistics for wood delivery related to MET Site A5	None expressed
Ongoing	Via phone, email and in-person meetings	Town of Stephenville	Ongoing discussions regarding Project updates and community engagement opportunities	
Ongoing	Via email and phone	Port au Port Regional Vibrancy Committee	Ongoing discussions regarding Project updates, questions and the Community Vibrancy Fund	

Table 3.2 Engagement with Communities

Date	Location	Stakeholder(s)	Purpose and Focus	Concerns Communicated
Ongoing	Via email and phone	Community leaders in the Codroy Project area	Ongoing discussions regarding Project updates, questions and the Community Vibrancy Fund	
Ongoing	Via email, phone and in-person at WEGH2's Stephenville Community Office	Community members in the Project area	Inquiries about opportunities to work with the company, training opportunities, and/or to provide goods and services when the Project begins construction	
Ongoing	Via phone, email and in-person meetings	Business, education and industry leaders	Discussing the Project and potential partnership opportunities	

3.1.2 Indigenous Engagement

WEGH2 continues to meet, engage and consult with Indigenous leaders and groups. In October 2023, WEGH2 welcomed a full-time Indigenous Relations Manager to the team, based in the St. John's office. The new team member is a Mi'kmaw woman, and member of Qalipu First Nation, who grew up in the Project area and has deep knowledge of the people and cultures particular to the area.

In December 2023, Qalipu First Nation (QFN) welcomed a new Interim Chief, Jenny Brake. WEGH2 has since been working to build a relationship with Chief Jenny Brake, and will continue to build a respectful, trusting, and mutually beneficial relationship with the Chief and QFN.

Concerns communicated to WEGH2 during Indigenous engagement are provided in Table 3.3.

Table 3.3 Engagement with Indigenous Groups

Date	Location	Stakeholder(S)	Purpose and Focus	Concerns Communicated
05-Sep-23	Stephenville, WEGH2 Community Office	Indigenous band council chiefs, NARMN representatives	Share EIS findings; answer questions	Potential environmental and social impacts; ensuring Indigenous community benefits
26-Sep-23	Email	Port au Port Indian Band	Invitation to Blanket Exercise	None expressed
03-Oct-23	Our Lady of Mercy Complex, Port au Port West	Port au Port Indian Band	Participated in Blanket Exercise	None expressed

Table 3.3 Engagement with Indigenous Groups

Date	Location	Stakeholder(S)	Purpose and Focus	Concerns Communicated
04-Oct-23	Online meeting (MS Teams)	Qalipu First Nation and Qalipu Development Corporation	Partnership development	Indigenous community benefits
12-Oct-23	Online meeting (MS Teams)	Newfoundland Aboriginal Women's Network (NAWN)	NAWN's plans and potential for partnership	None expressed
25-Oct-23	Email	Flat Bay Band; Benoit First Nation; Qalipu First Nation; Port au Port Indian Band	Introduction to Indigenous Relations Manager	None expressed
26-Oct-23	Email	Flat Bay Band	Introduction to Indigenous Relations Manager	None expressed
27-Oct-23	Email	Burgeo First Nation; St. George's Indian Band	Introduction to Indigenous Relations Manager	None expressed
29-Oct-23	Flat Bay Band Office	Flat Bay Band Chief and Council, Elders, employees and community members	Attended Flat Bay Band Annual General Assembly	None expressed
02-Nov-23	WEGH2 St. John's Office	Qalipu Development Corporation	Partnership development	Indigenous community benefits
20-Nov-23	Email	Port au Port Indian Band	EIS feedback	The colonial or school-taught story throughout the EIS particularly with respect to the local socio-economic environment, and land and resource use in Port au Port
05-Dec-23	Email	Three Rivers Mi'kmaq Band	Project status	Potential impacts of a project delay; Indigenous community benefits
07-Dec-23	Phone call	Three Rivers Mi'kmaq Band	Project status	Potential impacts of a project delay; Indigenous community benefits

Table 3.3 Engagement with Indigenous Groups

Date	Location	Stakeholder(S)	Purpose and Focus	Concerns Communicated
15-Dec-23	WEGH2 Community Office, Stephenville	Community leaders and residents; Indigenous leaders; business owners	Holiday social	Shared support for the Project
04-Jan-24	Stephenville, WEGH2 Community Office	Community members, mayors, Qalipu First Nation, local band chiefs, and business owners	EIS Amendment update	Project's potential impact on old mine site in Aguathuna; new Romaine's Bridge load capacity; traffic routing and management; transmission line reliability in extreme weather events; interaction with domestic electricity reliability and rates; Noel's Pond levels and overflow; blasting mitigation; Project monitoring and protocols; access road design; concerns about the potential for the Project being delayed or cancelled
05-Jan-24	Email	Port au Port East Indian Band	Virtual EIS Amendment update	None expressed
08-Jan-24	Email	Indian Head First Nation	Virtual EIS Amendment update	None expressed
09-Jan-24	Online (webinar)	Community members, local band chiefs, business owners, government representatives	EIS Amendment update	Potential impacts on residential/domestic water supplies; traffic routing and management; blasting mitigation; carbon footprint; interaction with domestic electricity reliability and rates; access to employment, education and training opportunities; access to service / supply opportunities
09-Jan-24	Email	Flat Bay Mi'kmaq Band; St. George's Indian Band	Follow-up with band chiefs regarding their request to consider an area for a marine landing site	None expressed
15-Jan-24	Email	Benoit First Nation	Invitation to Degrau Mawi'omi July 2024	None expressed

Table 3.3 Engagement with Indigenous Groups

Date	Location	Stakeholder(S)	Purpose and Focus	Concerns Communicated
16-Jan-24	St. John's, WEGH2 Project Office	Chief Jenny Brake, Qalipu First Nation	3.5-hrs of meetings regarding the project and WEGH2's partnership with Qalipu	Approach to partnership; ongoing community consultation and engagement; collaboration with local community bands
17-Jan-24	St. John's	Chief Jenny Brake, Qalipu First Nation, and Chief Mi'sel Joe, Miawpukek First Nation	Meeting	Commitment to ongoing engagement and collaboration
Ongoing	Via phone, email and in-person meetings	Indigenous community leaders	Discussing the Project and potential partnership opportunities	

3.1.3 Outfitter Engagement

In accordance with section 7.2.8.4 of the EIS Guidelines, an Outfitter Environmental Effects Monitoring Plan (OEEMP) will be developed prior to the start of construction: “The OEEMP shall include a description of the potential environmental effects of the Project on outfitters, measures to mitigate those effects and monitoring plans for the life of the Project. The EIS shall prepare and submit the OEEMPs subsequent to the completion of the EIS, but before the initiation of Project construction.” A draft Table of Contents for the OEEMP is included with this EIS Amendment as Appendix 2-J.

The potential effects on Outfitters are assessed in the following sections of the EIS:

- Chapter 17: Economy, Employment and Business
- Chapter 18: Communities
- Chapter 20: Land and Resource Use

Chapter 4: Consultation and Engagement of the EIS summarizes the Socio-Economic Baseline Study (Appendix 4D) which details the questionnaire that was administered by the Newfoundland and Labrador Outfitters Association (NLOA) via email. WEGH2 has also engaged each of the potentially impacted outfitters directly during the EIS process. The appendix in Chapter 4 summarizes input received from outfitters on key issues and concerns.

Following the submission of the EIS in August 2023, WEGH2 has kept in touch with the NLOA and Outfitters in or near the proposed project area regarding plans and site work for the wind measurement campaign in the Anguille Mountains. This campaign included the installation of meteorological evaluation towers (MET) in the area. Coordination with Outfitters was important throughout fall 2023 as WEGH2’s team worked to avoid interfering with the fall hunting season as much as possible.

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During the MET site development and tower installation in fall 2023, WEGH2 purchased services from local outfitters and rented outfitting lodges, as available, resulting in additional operational revenue for outfitters. This was a mutually beneficial arrangement as the outfitters provided value-added services in close proximity to the MET sites and possess deep local knowledge of the area. Ongoing cooperation and coordination was achieved to minimize interruption to outfitting operations and their clientele as WEGH2 executed the work required. WEGH2 also sponsored the NLOA’s annual general meeting (AGM) in fall 2023.

Table 3.4 provides a snapshot of engagement with outfitters in fall 2023. This record is not exhaustive as there were frequent interactions regarding the MET site coordination and service provision. The following table focuses on the interactions that are most applicable to the Environmental Assessment process.

Table 3.4 Engagements with Outfitters (August 2023 to January 2024)

Date	Location	Stakeholder(S)	Purpose & Focus	Concerns Communicated
03-Aug-23	Email	NLOA and outfitters in or near the proposed project area	Email from WEGH2 to outfitters to follow-up regarding the meeting held on 18-Jul-23 and to keep lines of communication open	None expressed
23-Aug-23	Emails and phone calls	NLOA and outfitters in or near the proposed project area	Advise outfitters of upcoming MET program site work in the Anguille Mountains	Ensure site work does not interfere with upcoming hunting season
29-Aug-23	Email	NLOA	Outfitter location mapping data	None expressed
14-Sept-23	Phone call	K. Ryan, Outfitter	MET program site work updates	None expressed
16-Sept-23	Phone call	D. Gillam, Outfitter	MET program site work updates	Ensure WEGH2 works around the outfitters’ schedules and avoids disrupting their hunting season
25-Sept-23	Email	D. Gillam, Outfitter	Timelines for the Project Nujio’qonik’s wind farm road work and construction	None expressed
28-Sept-23	Email	A. Ryan, Outfitter	Helicopter activity in relation to MET site work	Concerns about helicopter interfering with hunting season
16-Oct-23	Email	NLOA	Request to sponsor NLOA’s AGM	None expressed
16-Oct-23	Phone call	D. Gillam, Outfitter	Coordination of work to not interfere with hunting activities	None expressed

Table 3.4 Engagements with Outfitters (August 2023 to January 2024)

Date	Location	Stakeholder(S)	Purpose & Focus	Concerns Communicated
19-Oct-23	Email	D. Gillam, Outfitter	MET program site work updates	Ensure WEGH2 works around the outfitters’ schedules and avoids disrupting hunting season
08-Jan-24	Email	D. Gillam, Outfitter	Project Nujio’qonik’s timeline	None expressed
11-Jan-24	Email	J. Samms, Outfitting business team member	Project Nujio’qonik’s timeline	None expressed
Ongoing	Via phone, email and in-person meetings	NLOA and outfitters in or near the Project area	Discussing Project updates and timing	

Dialogue will continue with the NLOA in the development of the Outfitter Environmental Effects Monitoring Plan (OEEMP). The OEEMP will include a description of the potential environmental effects of the Project on Outfitters, measures to mitigate those effects, and monitoring plans for the life of the Project.

3.1.4 Fish Harvester Engagement

Since Project Nujio’qonik is an onshore project, engagement and consultation have been focused on onshore communities and groups with whom the Project may interact, as per the Project EIS Guidelines. As assessed in Chapter 11 of the EIS, Project interactions with fish harvesters are expected to be non-significant and primarily interactions associated with marine activities, such as dredging, port upgrades and subsea cable installation. The subsea cable installation is no longer the preferred option for power transportation from the Port au Port Peninsula.

Following the publishing of the EIS, union representatives from the Fish, Food and Allied Workers union (FFAW-Unifor) reached out to WEGH2 to begin engagement. On December 11, 2023, WEGH2 held a two-hour hybrid meeting (both in-person and online on MS Teams) with local fish harvesters and FFAW representatives. It was apparent that misinformation and misunderstandings were causing concerns for the group, as several of the participants believed the meeting was regarding an offshore wind project, and several participants feared that the hydrogen plant effluent (i.e., discharge water) would contain toxic substances that would harm lobsters and other inshore sea life. These misunderstandings were discussed and corrected during the meeting. WEGH2 committed to continuing engagement with local fishers through the FFAW, as we advance the design of the marine components and during the permitting phase of the Project.

Concerns communicated to WEGH2 during fish harvesters engagement are provided in Table 3.5.

Table 3.5 Engagements with Fish Harvesters (August 2023 to January 2024)

Date	Location	Stakeholder(S)	Purpose and Focus	Concerns Communicated
24-Aug-23	Email	FFAW-Unifor representatives	Planning a meeting	Offshore Project components; vessel traffic; potential space conflicts with inshore fishery; Project timing; mitigative measures
26-Sept-23	Email	FFAW-Unifor representatives	Planning a meeting	None expressed
27-Sept-23	Email	FFAW-Unifor representatives	Planning a meeting	Desire for a public meeting
6-Nov-23	Email	FFAW-Unifor representatives	Planning a meeting	Ensuring fish harvesters have an opportunity to ask questions
7-Nov-23	Email	FFAW-Unifor representatives	Planning a meeting	None expressed
15-Nov-23	Email	FFAW-Unifor representatives	Planning a meeting	None expressed
16-Nov-23	Email	FFAW-Unifor representatives	Planning a meeting	Improve awareness of the Project and understanding of potential fisheries impacts
27-Nov-23	Email	FFAW-Unifor representatives	Planning a meeting	None expressed
28-Nov-23	Email	FFAW-Unifor representatives	Planning a meeting	None expressed
7-Dec-23	Email	FFAW-Unifor representatives	Planning a meeting	None expressed
8-Dec-23	Email	FFAW-Unifor representatives	Planning a meeting	None expressed
11-Dec-23	Hybrid meeting: In-person at WEGH2's Community Office (Stephenville) and online (MS Teams)	Fish harvesters and FFAW-Unifor representatives	Discuss the Project's potential interactions with inshore fisheries	Offshore wind farm development (not applicable); plant effluent; offshore vibration and/or sound; potential effects on inshore fisheries
12-Dec-23	Email	FFAW-Unifor representatives	Follow-up from meeting; WEGH2 sharing presentation deck from meeting	None expressed

Table 3.5 Engagements with Fish Harvesters (August 2023 to January 2024)

Date	Location	Stakeholder(S)	Purpose and Focus	Concerns Communicated
15-Dec-23	Email	FFAW-Unifor representatives	Follow-up from meeting	Mitigation and monitoring programs
22-Dec-23	Email	FFAW-Unifor representatives	Letter from FFAW-Unifor to Minister Davis and Minister Parsons, GovNL	Mitigation and monitoring programs

3.1.5 Regulatory Consultation

In addition to the NL Environmental Assessment Committee (EAC), meetings with provincial and federal regulators periodically took place to provide updates on the Project, request information, and gain clarity on the EIS Amendment guidelines, where required. Table 3.6

Table 3.6 Consultation with Regulators

Regulator	Date of Meeting
Department of Fisheries and Oceans	November 23, 2023
Transportation and Infrastructure	November 23, 2023
Environmental Assessment Division	November 24, 2023
Industry, Energy and Technology, Mines Branch	November 28, 2023
Industry, Energy and Technology, Energy Branch	November 29, 2023
Water Resources Management Division	December 1, 2023
Wildlife Division	December 7, 2023
Pollution Prevention Division	December 14, 2023
Climate Change Branch	December 18, 2023
Tourism and Provincial Archaeology Office	December 18, 2023
Natural Areas Program	December 18, 2023
Digital Government and Service NL	December 19, 2023
Health and Community Services	December 20, 2023
Municipal and Provincial Affairs	December 21, 2023
Justice and Public Safety	January 9, 2024
Immigration, Population Growth and Skills	January 11, 2024

3.2 Public Comments

On November 24, 2023, NLDECC provided WEGH2 with a summary of public comments received during review of the EIS. The 50-day public review period (August 22, 2023, to October 11, 2023) provided opportunity for the public to provide comment on the EIS. During this period, comments were received from the following sources:

- 189 individual submissions indicating in favour (general support or specific comment e.g., economy)
- 151 individual submissions indicating not in favour (concerns raised)
- 304 form letters received from the Environmental Transparency Committee
- 397 form letters received from Codroy Valley United
- Codroy Valley Untied Petition with 410 signatures.

Public comments in support of the Project were focused on support for a transition to green energy, decreased carbon emissions, employment opportunities and economic growth for communities in the Project area. Main public concerns (and where they are addressed) as summarized by NLDECC are provided in Table 3.7.

Table 3.7 Summary of Main Public Comments Received during EIS Review

Main Public Concerns	Where Addressed in this Amendment (and/or EIS)
Lack of public consultation (for entire project, but in particular for Codroy wind farm)	WEGH2 is committed to continued public consultation and engagement throughout the life of the project, as outlined in the Public Participation Plan, which was submitted as Appendix 4-A of the EIS. Records of public consultation are provided in Chapter 4 of the EIS, as well as Chapter 3 of this Amendment.
Effects of noise (blasting, turbines, transmission lines), air quality (dust, fumes from diesel, gas, flaring at hydrogen-ammonia plant), light (shadow flicker, navigation lights in turbines), vibration (blasting, construction, turbines)	Information on noise, air quality, light, and vibration are provided in Section 2.8 of the EIS, and a model of Project noise is provided in Appendix 7-A of the EIS. In addition, the effects from noise, air quality, light, and vibration are discussed in several responses to regulator comments in this EIS Amendment, including FFA 26, FFA 30, and FFA 109 (Chapter 5), HCS 10, HCS 11 (Chapter 6), and MMD 23 (Chapter 7).
Ice throw from turbines, lack of safety standards	An analysis of potential ice throw was provided in Appendix 19-B of the EIS. In addition, information is also provided in this EIS Amendment, including MMD 3, 15, 17, and 24 (Chapter 7), and HCS 11 (Chapter 6).
Potential impacts to area fisheries (effluent, spills, dredging/disposal, shipping, noise, runoff, etc.)	The potential effects of the Project on marine fisheries are described in Chapter 11 of the EIS, and an Assimilative Capacity Study describing the mixing zone of marine discharge from the hydrogen / ammonia plant is provided in Appendix 11-A of the EIS. An updated description of marine-based Project components / activities is also included in Sections 2.4 and 2.5 and WRM 58 (Chapter 4) of this EIS Amendment.

Table 3.7 Summary of Main Public Comments Received during EIS Review

Main Public Concerns	Where Addressed in this Amendment (and/or EIS)
Restricted access to recreational activities within Project area	Interactions between the Project and recreational land use areas are discussed in Chapter 20 of the EIS. As well, the interaction between the Project and the Crabbe’s River Cottage Development Planning Areas is provided in FFA 42 (Chapter 5) of this EIS Amendment.
Loss of domestic wood cutting areas	Information on domestic wood cutting is provided in Chapter 20 and Appendix 4-B of the EIS. Wood cutting areas are also discussed in the response to FFA 1 (Chapter 5) of this EIS Amendment
Impacts to living off the land or traditional way of life (e.g., hunting, berry picking, medicinal plants, ancestral lands, artifacts)	Indigenous leaders, community leaders, and community members have provided feedback on traditional land use which have been incorporated into the design of the Project. The early engagement process has assisted WEGH2 in Project planning and design, and WEGH2 will continue to work towards deeper engagement with local stakeholders and Indigenous communities. Please see Chapter 4 of the EIS, as well as Appendices 4A-4D of the EIS, as well as Chapter 20 (Land and Resource Use) of the EIS.
Impacts to forestry operations and compensation	Information on domestic wood cutting is provided in Chapter 20 and Appendix 4-B of the EIS. Wood cutting areas are also discussed in the response to FFA 1 (Chapter 5) of this EIS Amendment
Impacts to Lower Cove Quarry	Project-related interactions with the Lower Cove Quarry are discussed in Chapter 20 (Land and Resource Use) of the EIS. These interactions are also discussed in responses to regulatory comments in this EIS Amendment including MMD 3, 15, 16, 17, 24, 27, 28, and 29 (Chapter 7).
Impacts to roads and infrastructure, coastal and soil erosion	Project-related interactions with local roads and infrastructure are discussed in Chapter 18 (Communities) and Appendix 2-C (Transportation Impact Study and Traffic Management Plan) in the EIS. As well, management of erosion during construction is provided in Section 2.5 of the EIS. An updated Traffic Impact Study is appended to this EIS Amendment as Appendix 2-K. These topics are also discussed in this Amendment, in Chapter 4 (responses to WRM 7, 10, 19, 55 and 56), Chapter 7 (response to EB 9), Chapter 9 (responses to DMPA 1 and 5), and Chapter 15 (response to DFO 2).
Impacts to other users of electrical grid	For information on the Project’s effects on the Provincial electrical grid, please see the response to EB 30 (Chapter 7) of this Amendment.
Lack of detail on worker camps, explosives magazines and concrete batch plants	Please see the responses to WRM 3, 4, and 5 (Chapter 4) and HCS 5 (Chapter 6) of this EIS Amendment for additional information on worker camps. Please see the response to HCS 5 (Chapter 4) of this EIS Amendment for additional information on the location of explosives magazines. Please see Chapter 4 (WRM 10) of this EIS Amendment for further clarification on batch plants.

Table 3.7 Summary of Main Public Comments Received during EIS Review

Main Public Concerns	Where Addressed in this Amendment (and/or EIS)
Inadequate information regarding climate change impacts to Project	Please see the response to WRM 52 in Chapter 4 of this EIS Amendment for further clarification on the effects of climate change
Impacts to birds, bats, moose, caribou, marten and fish and relevant habitat	Effects on wildlife and fish, as well as their habitats, was provided in Chapters 10 (Freshwater Fish and Fish Habitat), 12 (Wetlands and Vegetation), 13 (Avifauna), 14 (Bats), and 15 (Other Wildlife) in the EIS. Please also refer to Chapter 5 (responses to FFA12, FFA13, FFA14, FFA21, FFA25, FFA74, FFA75, FFA76, FFA81, FFA84, FFA86, FFA87, FFA109, FFA111, FFA112, FFA113) in this EIS Amendment.
Loss of habitat (forest, limestone barrens, aquatic)	Loss of habitat is discussed in Chapters 10 (Freshwater Fish and Fish Habitat), 12 (Wetlands and Vegetation), 13 (Avifauna), 14 (Bats), and 15 (Other Wildlife) in the EIS. Habitat loss, including limestone barrens, is discussed in responses to FFA 15, and 17-23 in Chapter 5 of this EIS Amendment.
Impacts to wetlands and water bodies, including estuaries	Please see Chapter 5 of this EIS Amendment (FFA 18). Further clarification is provided on planned wetland field surveys and the development of mitigation plans for effects on wetlands. The Response to FFA 24 provides information on the wetland at Gull Pond and wetland management in Canada.
Concerns about source water quality and quantity for hydrogen-ammonia plants	Please see the response WRM 13 in Chapter 4 of this EIS Amendment for further clarification on the industrial water process and supply.
Water quality and flooding of Noels Pond and surrounding floodplain	WEGH2 has met with the concerned parties in relation to Noels Pond, and has proposed a mutually agreeable, proactive solution to address these concerns at WEGH2's cost. WEGH2 will continue to engage with concerned parties and reach mutually agreeable solutions.
Impacts to private and public water supplies	Project effects to public water supplies are provided in Chapter 20 (Land and Resource Use) of the EIS. Information on changes to the Project since submission of the EIS related to public water supplies is provided in Section 2.5 of this Amendment. As noted in WEGH2's response to WRM 8 (Chapter 4), there will be no turbines in protected public water supply areas.
Cumulative effects assessment incomplete (other industry, resource users, projects, etc.)	Additional information on cumulative effects have been discussed in the response to FFA 18 and 24 (Chapter 5), MMD 28 (Chapter 7), and ECCC 44 (Chapter 14) of this EIS Amendment
No Gender Equity and Diversity Plan in the EIS	Equity, diversity and inclusion targets, and details regarding recruitment, will be included in the Equity, Diversity and Inclusion Plan, which will be developed in consultation with the Minister responsible for Women and Gender Equality subsequent to EIS approval and prior to Project construction.
Few details on rehabilitation/decommissioning	A description of decommissioning and rehabilitation is provided in Section 2.7 of the EIS and assessed as a phase of the Project in each of the VEC chapters. WEGH2 is aware that NLDIET are developing requirements for rehabilitation and closure planning requirements to be applied to wind projects in the Province.

Table 3.7 Summary of Main Public Comments Received during EIS Review

Main Public Concerns	Where Addressed in this Amendment (and/or EIS)
Impacts to marine life, and habitat, collision with marine mammals during shipping	Updated information on Project components interacting with the marine environment are detailed in Chapter 2 of this EIS Amendment. In addition, Project interactions with the marine environment are discussed in WEGH2's response to DFO 1 (Chapter 15).
Impacts from the installation of marine cable	Use of a marine cable for the transmission of electricity across the Port au Port Isthmus is no longer WEGH2s preferred option. Further information on the options for, including the preferred option, is provided in Section 2.5.2 of this EIS Amendment.
Dredging and the potential of stirring up contaminants	Project interactions with the marine environment are discussed in WEGH2's response to DFO 1 (Chapter 15) of this amendment.
Impacts to outfitters (Anguille Mountains)	Project effects on outfitters is provided in Chapter 20 of the EIS. Since submission of the EIS, WEGH2 has continued to consult with outfitters. Information on this consultation is provided in Section 3.2.3 of this Amendment.
Impacts to viewscape	An analysis of viewscape was provided in Appendix 19-A (Visual Assessment Technical Report) of the EIS.
Impacts to health care and social programs (population growth)	Project effects on communities and social infrastructure is provided in Chapters 18 (Communities) and 19 (Human Health and Quality of Life) of the EIS

4.0 NL Department of Environment and Climate Change

During review of the Environmental Impact Statement (EIS) for Project Nujio'qonik (the Project), technical comments were provided by the Pollution Prevention Division (PPD; Section 4.1), the Water Resources Management Division (WRMD; Section 4.2), the Climate Change Branch (CCB; Section 4.3), and the Natural Areas Program, Policy, Planning and Natural Areas Division (NAP; Section 4.4) of the Newfoundland and Labrador (NL) Department of Environment and Climate Change (NLDECC). The technical review comments from each branch, and World Energy GH2 LP (WEGH2) responses to those comments, are presented in the following sections.

4.1 Pollution Prevention Division

Response to PPD 1

Comment ID:	PPD 1
Department:	NL Environment and Climate Change
Branch/ Division:	Pollution Prevention Division
EIS Guidelines Reference (Where provided):	2.3.1 b) General Layout: The EIS shall provide a written and graphic description (e.g. maps, aerial imagery and drawings) of the...hydrogen and ammonia production facility, including...a description of the following: i buildings, structures, and infrastructure required for water electrolysis and hydrogen and ammonia production;
Reviewer's Comment:	Information provided on processes to be utilized to produce hydrogen/ammonia, preliminary plant layout and components are described. Air Separation Unit (ASU). There is no discussion on this unit in the EIS, just indicating that: "The ASU is a standard, known technology". Additional information should be provided on the ASU operation, throughput, potential emissions and interaction with other sources, how it will deal with moisture and air contaminants such as particulate.
Response:	The air separation unit will be a standard industrial design commonly used in industrial facilities throughout Canada. Its sole purpose is to produce nitrogen for the ammonia synthesis reaction. Oxygen and other atmospheric gases will be returned to the atmosphere whence it came. The throughput of the unit is 36,000 NM3/hr. The Air Separation Unit (ASU) vendor has not yet been selected; however, the process is very similar between vendors of cryogenic systems. The feedstock is atmospheric air. The air is first filtered prior to the Main Air Compressor to remove airborne particulates. The filters used are cartridge type filters for filtering particles (e.g., soot etc.) >0.3 microns and are not replaced or changed over the lifetime of the plant. Rather they are just cleaned with a backflow of nitrogen/pure air when the pressure drop increases beyond the set value (usually above 10 mbar). The backflow expels the accumulated airborne particles back to the atmosphere from whence they came.

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Comment ID:	PPD 1
	<p>Therefore, when the filters are cleaned with the backflow, there is NO hazardous or toxic material/gases that are let out.</p> <p>The filtered air is then compressed in the Main Air Compressor. During the compression process, the compressed air is cooled and some of the water vapour in the air is condensed.</p> <p>To remove carbon dioxide (CO₂), hydrocarbon contaminates, and the remaining water, the compressed air is passed through an Air Purification Unit (APU) which removes those components. The APU consists of a dual bed (successive layers of alumina and molecular sieve) air purification system. The activated alumina stops moisture by adsorption. The molecular sieve on top of the activated alumina bed will then adsorb all the other impurities like carbon monoxide, CO₂ etc., The air is thus purified in the Air Purification system to remove carbon dioxide, water and heavy hydrocarbons on beds of alumina and molecular sieve. Each dual-bed Air Purification Vessel operates alternately in adsorption and regeneration phases in time-controlled sequences. During the regeneration step waste nitrogen gas from the cold box is warmed in the steam-heated Regeneration Heater prior to entering the Air Purification Vessels. The spent regeneration gas is vented to the atmosphere. The spent regeneration gas contains only gases extracted from atmospheric air in the Air Purification unit. The molecular sieve and activated alumina have a lifetime > 15 years. In case of replacement, the spent mol sieve and activated alumina will be removed by the suppliers of the catalysts and disposed of by them.</p> <p>The purified air is then passed to a vertical refrigerated cold box. The cold box consists of cryogenic distillation and cooling components which separate the nitrogen from the air. The remaining oxygen rich gas has no current use in Stephenville so is vented back to the atmosphere.</p> <p>The water produced from the ASU is routed to the water treatment plant.</p> <p>The plant consists of a compressor shelter, vertical cold box, and a number of vertical cryogenic distillation towers with interlinking piperacks.</p> <p>The infrastructure to support the ASU is simple, comprising foundations, prefabricated electrical substation and nitrogen storage.</p>
Supporting Documentation:	None

Response to PPD 2

Comment ID:	PPD 2
Department:	NL Environment and Climate Change
Branch/ Division:	Pollution Prevention Division
EIS Guidelines Reference (Where provided):	2.3.1 b) General Layout: The EIS shall provide a written and graphic description (e.g. maps, aerial imagery and drawings) of the...hydrogen and ammonia production facility, including...a description of the following: ii above ground and underground hydrogen, ammonia and carbon storage, including transportation to storage;
Reviewer's Comment:	Ammonia and hydrogen to be stored on-site in engineering tanks/storage vessels. Estimates of storage capacities are developed.
Response:	Thank you. No response required.
Supporting Documentation:	None

Response to PPD 3

Comment ID:	PPD 3
Department:	NL Environment and Climate Change
Branch/ Division:	Pollution Prevention Division
EIS Guidelines Reference (Where provided):	2.3.1 b) General Layout: The EIS shall provide a written and graphic description (e.g. maps, aerial imagery and drawings) of the...hydrogen and ammonia production facility, including...a description of the following: v auxiliary energy sources, including gas turbines to support hydrogen and ammonia production;
Reviewer's Comment:	Potential auxiliary energy source options are identified. These include battery energy storage, renewable diesel/biodiesel power generation and salt cavern compressed air energy storage.
Response:	Thank you. No response required.
Supporting Documentation:	None

Response to PPD 4

Comment ID:	PPD 4
Department:	NL Environment and Climate Change
Branch/ Division:	Pollution Prevention Division
EIS Guidelines Reference (Where provided):	2.3.1 b) General Layout: The EIS shall provide a written and graphic description (e.g. maps, aerial imagery and drawings) of the hydrogen and ammonia production facility, including...a description of the following: vii waste management structures, including solid waste and waste water effluent discharge;
Reviewer's Comment:	Waste Management Plan developed to identify and address solid and liquid waste generated throughout the project. A new pollution control building will serve as a central hub for the blending of streams and for directing treated effluent to an existing effluent pipeline for discharge into Bay St. George.
Response:	Thank you. No response required.
Supporting Documentation:	None

Response to PPD 5

Comment ID:	PPD 5
Department:	NL Environment and Climate Change
Branch/ Division:	Pollution Prevention Division
EIS Guidelines Reference (Where provided):	2.3.1 b) General Layout: The EIS shall provide a written and graphic description (e.g. maps, aerial imagery and drawings) of the...hydrogen and ammonia production facility, including...a description of the following: viii storage facilities for hazardous materials, gas and liquid fuel;
Reviewer's Comment:	Hazardous products will be stored according to industrial requirements and standards. Ammonia and hydrogen will be stored on site in designated storage tanks/vessels. The storage of butane is not addressed in the EIS.
Response:	Butane storage is no longer required. During preliminary Front-End Engineering Design, the Project identified that propane would be a more suitable medium for the flare pilot lights based on its lower boiling point and widespread availability. Butane may not vaporize during cold spells. The Project may require up to three pilot lights, each requiring 1 kilogram per hour (kg / hr) of propane. 3 kg / hr of propane equates to roughly the contents of one commercially available 1,500-gallon tank for a one month supply.
Supporting Documentation:	None

Response to PPD 6

Comment ID:	PPD 6
Department:	NL Environment and Climate Change
Branch/ Division:	Pollution Prevention Division
EIS Guidelines Reference (Where provided):	7.2.1 Plans: The EIS shall include an Emergency Response/Contingency Plan outlining procedures to respond to accidents, malfunctions and emergencies, including: a) accidental spills and/or releases of hydrogen, ammonia, chemicals, pesticides or any potentially hazardous substance on land or in air or water (from the hydrogen/ammonia plant);
Reviewer's Comment:	WEGH2 has prepared an Emergency Response and Contingency Plan for the Project, which outlines response procedures for potential accidents, malfunctions and emergency scenarios.
Response:	Thank you. No response required.
Supporting Documentation:	None

Response to PPD 7

Comment ID:	PPD 7
Department:	NL Environment and Climate Change
Branch/ Division:	Pollution Prevention Division
EIS Guidelines Reference (Where provided):	.2.2 The EIS shall include a Waste Management (Plan) that shall describe all liquid and solid waste expected to be generated during construction, operation and maintenance, decommissioning, and rehabilitation for all components of the Project, and methods to reduce, reuse, recycle, recover, and/ or manage residual wastes through disposal.
Reviewer's Comment:	A Waste Management Plan has been prepared for all phases of the Project.
Response:	<p>Thank you. One addition to the Waste Management Plan (WMP) will be the disposal of the concrete rubble from the foundations at the plant site in the former Abitibi landfill. The WMP is currently being discussed as part of ongoing Environmental Site Assessment and Remedial Action Plan, with representatives of the Impacted Sites group, Newfoundland and Labrador Department of Environment and Climate Change.</p> <p>The overall landfill has an area of approximately 60,000 to 70,000 square metres. The recent Light Detection and Ranging (LiDAR) data shows that the original landfill had a low berm around its edge. WEGH2's long term plan is to construct a containment / filter berm about 15 m to 25 m from the down-gradient edge of the existing landfill. The berm would be about 6 m wide on the top and about 2.0 to 2.5 m above the existing landfill elevation.</p>

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Comment ID:	PPD 7
	The map has a Y:X 5:1 vertical exaggeration. Please see figures of the proposed construction debris storage site (existing landfill) in Appendix PPD7-A.
Supporting Documentation:	Appendix PPD7-A Construction Debris Storage Site Figures

Response to PPD 8

Comment ID:	PPD 8
Department:	NL Environment and Climate Change
Branch/ Division:	Pollution Prevention Division
EIS Guidelines Reference (Where provided):	2.3.3 Operation and Maintenance: All aspects of the operation and maintenance procedures for the undertaking shall be described in this section of the EIS, including but not limited to the following: g) chemicals to be used as part of operations (hydrogen/ammonia plant)
Reviewer's Comment:	The EIS does not identify chemicals that may be used as part of operations associated with the hydrogen/ammonia plant.
Response:	Please see Table PPD 8.1 for a preliminary list of chemicals that may be used as part of the operation of the ammonia / hydrogen plant. The final list of chemicals required will be determined during Front-End Engineering Design.
Supporting Documentation:	Table PPD 8.1 Preliminary List of Chemicals and Catalysts

Table PPD 8.1 Preliminary List of Chemicals and Catalysts

Type	Description	Use	Mode of Operation	Destination
Chemicals	Corrosion Inhibitor (SUEZ/CORRSHIELD NT4203_Nitrite type or equivalent)	Corrosion inhibitor in Closed loop cooling water system in PEM Facility	Intermittent manual injection by an injection pot	Closed Loop Cooling System
	Biocide (SUEZ/SPECTRUS NX1100 or equivalent)	Anti-microbial in Closed loop cooling water system in PEM facility	Intermittent manual injection by an injection pot	
	100% Mono Ethylene Glycol (MEG)	Closed loop cooling water system in PEM facility	Controlled drainage to vacuum truck during maintenance. Will not enter environment.	
	Phosphate (Nalco 1742 or equivalent)	Phosphate injection for Loop Steam Drum in NH3 unit	Continuous dosing	Boiler Water Control
	Oxygen Scavenger (SUEZ/ PCORTROL OS5601 or equivalent)	Used in Deaerator of NH3 unit	Continuous dosing	
	Ammonia for Neautralizer	Used in Deaerator of NH3 unit	Continuous dosing	
	Ferric sulfate 50%	Coagulant injection for pretreatment (Clarifier) if needed in the raw water treatment and/or the wastewater treatment package	Vendor injection and dosing	Raw Water Treatment and/or Wastewater treatment
	Flocculant	Used in wastewater treatment upstream of clarifier for improved removal efficiency	Vendor injection and dosing	
	Polymer	Used in wastewater treatment for sludge conditioning.	Vendor injection and dosing	
	NaOCl (12%)	4 places it could be used: 1. Pretreatment (clarifier) of wastewater treatment package. 2. Chemical enhanced backwash (ultrafiltration) of water treatment package. 3. CIP for ultrafiltration 4. Potential for Ammonia removal process (still under study)	In all uses, vendor injection and dosing	

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Type	Description	Use	Mode of Operation	Destination
	HCl (32%)	4 possible uses: 1. Chemical enhanced backwash in ultrafiltration. 2. pH adjustment of RO feed water. 3. pH adjustment of Neutralization Sump 4. as needed for wastewater reactions	In all uses, vendor injection and dosing	
	Antiscalant (SHMP)	Used in RO feed water as part of water treatment program	Vendor injection and dosing	
	Dechlorination (SBS)	Used in RO feed water as part of water treatment program	Vendor injection and dosing	
	Citric acid 100%	Used as CIP for ultrafiltration	Vendor injection and dosing	
	NaOH (50%)	2 possible uses: 1. pH adjustment for neutralization sump 2. as needed for wastewater reactions	Vendor injection and dosing	
	CIP-1 (Acid) (PWT/Lavasol 1 or equivalent)	CIP for the Reverse Osmosis - removes metal hydroxides, carbonates, phosphates and similar scales	Vendor injection and dosing	
	CIP-2 (Alkali) (PWT/Lavasol 2 or equivalent)	CIP for Reverse Osmosis - removes silt, colloids, organics, particulate, biological, and other acid insoluble foulants	Vendor injection and dosing	
	Corrosion Inhibitor (SUEZ / GENGARD GM8310 or equivalent)	Corrosion inhibitor for the cooling tower basin	Continuous dosing by chemical dosing control system	Conventional Open Loop Cooling Water System
	Scale Dispersant (SUEZ / GENGARD GN8021 or equivalent)	Used in the cooling tower basin	Continuous dosing by chemical dosing control system	
	Non-Oxidizing Biocide (SUEZ/ SPECTRUS NX1116 or equivalent)	Anti-microbial agent for the cooling tower basin	Intermittent dosing by chemical dosing control system with a shock dosing every month	
	12% Sodium Hypochlorite (NaOCl)	Part of biocide injection for cooling tower basin	Continuous dosing by chemical dosing control system	
	98% Sulfuric Acid (H2SO4)	Used in the cooling tower basin	Continuous dosing by chemical dosing control system	

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Type	Description	Use	Mode of Operation	Destination
Catalysts	Pre-reduced Catalyst (KM1R) Size: 1.5 ~ 3.0 mm (Irregular grains) Chemical Composition Fe, Fe oxides : 92 ± 2%, K ₂ O, Al ₂ O ₃ , CaO, SiO ₂ : 8 ± 2%	Used in the first bed of ammonia synthesis - Reduces time required for catalyst activation and only generates minor amounts of water. (The ammonia water will be treated prior to outfall.)	Loaded at workshop by vendor	Catalyst materials at time of replacement to be shipped to manufacturers for recycling or for offsite disposal
	Oxidized Catalyst (KM1113) Size: 1.5 ~ 3.0 mm (Irregular grains) Chemical Composition Fe oxides : 94 ± 2% , : Catalyst promoters : 6 ± 2%	Used in conjunction with KM1R - used in lower beds of reactor where ammonia concentration is higher	Loaded at workshop by vendor	
	Deoxo Catalyst (Alumia base with Palladium) to be confirmed	part of PEMEC BOP to remove oxygen from the product.	Loaded at workshop by vendor	
	PRM 25 Packing	Used in the off gas scrubber	Loaded at workshop by vendor	
	Activated alumina	Used in molecular sieve absorber as part of N ₂ generation package	Loaded at workshop by vendor	
	Activated carbon	Used in the activated carbon filter that's part of water treatment package	Loaded at site	
	Membrane	2 uses: 1. Ultrafiltration part of water treatment package. 2. RO part of water treatment package	Loaded at site	
	Molecular Sieves	Part of the air dryer package to remove moisture from air.	Loaded at workshop by vendor	
<p>Note - This list is preliminary based on the Pre-FEED design. It is subject to change through the FEED and detailed design phase.</p>				

Response to PPD 9

Comment ID:	PPD 9
Department:	NL Environment and Climate Change
Branch/ Division:	Pollution Prevention Division
EIS Guidelines Reference (Where provided):	2.3.3 Operation and Maintenance: All aspects of the operation and maintenance procedures for the undertaking shall be described in this section of the EIS, including but not limited to the following: i) proposed water source(s), estimated daily and annual volume of water quantity and water quality requirements, and any treatment needed to meet the required water quality for hydrogen and ammonia production;
Reviewer’s Comment:	Proposed water sources have been identified. Treatment technology for the water purification has not yet been determined. The EIS indicates that it is assumed that the water purification process will include (i) pretreatment using various types of filters such as multi-media and carbon filters, (ii) double-pass reverse osmosis, and (iii) ion exchange as polishing step. These technologies will be confirmed during subsequent stages of design and may modify assumptions.
Response:	The reviewers’ comments are correct. However, based on existing design philosophy, a preliminary characterization of the wastewater discharge is attached as Appendix PPD9-A. A revised characterization can be provided once Front-End Engineering Design and Detailed Design are complete.
Supporting Documentation:	Appendix PPD9-A Preliminary Wastewater Effluent Composition

Response to PPD 10

Comment ID:	PPD 10
Department:	NL Environment and Climate Change
Branch/ Division:	Pollution Prevention Division
EIS Guidelines Reference (Where provided):	2.3.3 Operation and Maintenance: All aspects of the operation and maintenance procedures for the undertaking shall be described in this section of the EIS, including but not limited to the following: k) characterization of wastewater effluent from hydrogen and ammonia production...description of treatment required for effluent to meet regulatory standards for discharge, and a description of the receiving environment for wastewater discharged during hydrogen and ammonia production;
Reviewer’s Comment:	The EIS has not sufficiently characterized the wastewater effluent from the hydrogen/ammonia plant. The EIS notes that facility process streams are not yet finalized. The source water and water treatment facility will be further defined to identify which treatment options will be suited for the wastewater stream. WEGH2 has indicated that they are currently evaluating wastewater treatment options, and that the treated effluent will be designed to be discharged to the ocean and needs to meet the discharge limit under the Schedule A of the Environmental Control Water and Sewage Regulations (ECW&SR).

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Comment ID:	PPD 10
	<p>In Section 2.8.5, two industrial wastewater streams are noted: High TSS/low TDS stream, and High TDS stream, with concentrations of TSS and TDS noted for each stream. The basis for this characterization and how these values were derived has not been presented. It should be noted that the concentrations presented for these parameters exceed the applicable discharge limits in Schedule A of the ECW&SR.</p> <p>It is stated in the EIS that the limits for TSS and TDS will be used as the design basis for concept design. It is further stated that there are other parameters in the ECW&SR such as the biological oxygen demand, bacteria, and heavy metals which must be met before discharging the effluent to the harbour. However, the EIS further notes that “these water quality parameters are not known at this time and are highly dependent on the process... The design will be subject to various levels of regulatory influence as the Project moves through the environmental approvals process and subsequent permitting for construction and operation.”</p> <p>Sufficient information should be presented in the EIS regarding characterization of wastewater effluent from the hydrogen/ ammonia plant and description of the design and effectiveness of any effluent treatment system to be used, to demonstrate whether the effluent can be expected to consistently meet the discharge limits specified in the ECW&SR.</p>
Response:	Refer to Appendix PPD9-A for a preliminary characterization of the wastewater discharge. A revised characterization can be provided once Front-End Engineering Design and Detailed Design are complete.
Supporting Documentation:	Appendix PPD9-A Preliminary Wastewater Effluent Composition

Response to PPD 11

Comment ID:	PPD 11
Department:	NL Environment and Climate Change
Branch/ Division:	Pollution Prevention Division
EIS Guidelines Reference (Where provided):	<p>2.3.3 Operation and Maintenance: All aspects of the operation and maintenance procedures for the undertaking shall be described in this section of the EIS, including but not limited to the following:</p> <p>n) characterization and estimation of annual and daily atmospheric discharges from hydrogen and ammonia production, including detailed specifications and air emission estimates on the emergency back-up power generation, the electrolyzer cooling system, and the air separation unit.</p>
Reviewer's Comment:	The EIS identifies the main sources of air emissions and include the operation of the hydrogen / ammonia plant (flare pilot, flaring event, and cooling tower) and the use of a bio-diesel generator for back-up power. Air emission estimates are developed for these sources.

<p>Comment ID:</p>	<p>PPD 11</p>
	<p>Comments/questions related to the development of air emission estimates:</p> <ul style="list-style-type: none"> a) Back-up power requirements. The EIS is non-committal on whether the back-up power supply (50 MW) will be combustion turbine or generators – as terminology is seemingly interchanged. Non GHG emission calculations were based on combustion turbine, however GHG emission calculation would appear to be based on generators. Emission profiles are likely quite different between a combustion turbine and generators. Additionally if it is to be a combustion turbine, then is it a simple cycle or a combined cycle - again emission profiles would be different for each. b) Calculations of air contaminants. In general, there is insufficient data presented to validate the emissions being reported. Using construction blasting as an example, TPM has an emission rate cited of 23.06 kg/blast (Table 6A-1), which translates into an annual emission of 92 tonnes (Table 6.15). It is not clearly stated how many blasts per year are to occur and how many are required at each turbine location. Additionally the emission factor cited of 23.06 kg/blast would appear to come from the ECCC / NPRI workbook. A back calculation to come up with the emission factor indicates the blast area would be ~ 2223 m². Again no clear indication of where these values are coming from. As such, the derivation of the emission factors and associated emissions for both construction and operation need to be better articulated for all identified emission sources. c) In conjunction with item above, in section 2.8.1, the amount of butane required for each flare pilot is cited as 6500 SCFH. Table 6.18 indicates the requirement is 30 SCFH per flare. Which is it and what impact does that have on emission calculations? d) Cooling Towers. There is minimal discussion on their operation, impacts and maintenance. Would the emissions from these towers present fogging or icing concerns in surrounding areas? A water vapour fall-out analysis using the CALPUFF FOG module may be informative here.
<p>Response:</p>	<ul style="list-style-type: none"> a) The units being considered for back-up power supply are a reciprocating engine (generator) or a gas combustion turbine. The specific unit to be used has not yet been chosen and will be selected when the In-Feed design is final. Contingent on the technology and equipment available, the back-up power units might use hydrogen or ammonia as a fuel source in addition to biodiesel. <p>The calculations for greenhouse gas (GHG) emissions from the back-up power unit were based on a fuel emission intensity for the combustion of the specific biodiesel of 27 g CO₂/MJ, and not directly tied to whether it was a combustion turbine or generator. This emission intensity was provided by the WEGH2 design team. The combustion of hydrogen/ammonia would not contribute to emissions of GHGs, and as such, assessing using biodiesel is considered conservative.</p> <p>The air contaminant emissions are based on the back-up power unit being a simple cycle combustion turbine combusting bio-diesel, with an assumed thermal efficiency of 30% and alternator efficiency of 90%. WEGH2 compared how the emission profiles between a generator and combustion turbine of 50 MW would differ, and for all air contaminants but carbon monoxide (CO), using the combustion turbine estimation method was conservative, i.e., result in</p>

<p>Comment ID:</p>	<p>PPD 11</p>
	<p>higher emission rates than the hypothetical generator, except for CO. Since the ambient standard for CO is a relatively high value (1-hour standard of 35,000 µg/m³, this would not alter the conclusions of the assessment. The estimates of the emissions are provided in Table PPD 11.1 Once the specific unit and its fuel usages are established, the emission estimates and dispersion modelling will be updated, during permitting phase, if requested.</p> <p>b) The detailed emissions inventory has been provided in Appendix PPD11-A for both the construction and operational phases. Upon review of this comment, we revisited the calculations and made revisions. The area per blast has been revised based on the required volume of rock for Project construction, as described in the Project Description (see Appendix PPD11-A). This value (19,048 m²) is more representative than the original value (2,223 m²) of the assumed blast area. Based on this change, the revised Table 6-12 of the Environmental Impact Statement (EIS) has been provided in Appendix PPD11-A.</p> <p>c) Regarding the flaring, the value used in the emission calculation (30 standard cubic feet per hour (SCFH) per flare) was confirmed to be correct at the time by the design team. The value of 6,500 standard cubic feet per minute (SCFM) presented in Section 2.8.1 of the EIS was provided at the outset when there was some confusion around units (British thermal unit / hour [BTU/hour] vs SCFH). The requirement was 65,000 BTU/hr heating value per flare, which converts to 22 SCFH of butane, and as such using the 30 SCFH value is conservative (resulting in a higher emission rate).</p> <p>d) Through proper equipment configuration, selection, design (i.e., stack height), and layout, WEGH2 will prevent fogging and icing from impacting surrounding areas.</p> <p>At the conclusion of preliminary Front-End Engineering and Design (pre-FEED) / conceptual engineering, WEGH2 has not yet selected a cooling tower configuration (a single central system or multiple dispersed systems) or a manufacturer, furthermore, WEGH2 continues to optimize the plant layout. During pre-FEED, WEGH2 used industry norms to locate the cooling towers according to the wind rose and spacing distances. The current central cooling tower location is set such that the plume should not affect the public roads outside of the plant plot limits. Industry guidelines suggest that cooling towers should be 10s of metres away from roads (Botermans and Smith 2008). In our design, the cooling towers are located hundreds of metres from the public roads.</p> <p>During FEED, WEGH2 will select a manufacturer and will work with them to establish final location and stack height to avoid potential impacts.</p> <p>Reference: Botermans & Smith. 2008. Advanced Piping Design: Chapter 8: Cooling Towers. Accessed online at: https://www.sciencedirect.com/science/article/abs/pii/B9781933762180500167</p>
<p>Supporting Documentation:</p>	<p>Table PPD 11.1 Comparison of Emission Rates – Generator vs. Combustion Turbine Revised EIS Table 6-15 Air Contaminant Releases – Construction Appendix PPD11-A Detailed Emission Inventory</p>

Table PPD 11.1 Comparison of Emission Rates – Generator vs. Combustion Turbine

Air Contaminant	Hourly Emission Rate (g/s)	
	Generator	Combustion Turbine
Nitrogen Oxides (NOx)	48.43	70.06
Carbon monoxide (CO)	48.43	0.26
Sulphur dioxide (SO ₂)	0.04	0.12
Total suspended particulate (TSP)	0.56	0.96
Particulate matter <10 microns (PM ₁₀)	0.56	0.96
Particulate matter <2.5 microns (PM _{2.5}) ()	0.56	0.96

Response to PPD 12

Comment ID:	PPD 12
Department:	NL Environment and Climate Change
Branch/ Division:	Pollution Prevention Division
EIS Guidelines Reference (Where provided):	2.3.3 Operation and Maintenance: All aspects of the operation and maintenance procedures for the undertaking shall be described in this section of the EIS, including but not limited to the following: o) procedures for, and estimated frequency of, flaring and/or venting of hydrogen/ammonia;
Reviewer's Comment:	The facility will have three flare stacks that will be used to flare ammonia or hydrogen during non-routine events. The flare pilot will be lit continuously using butane so that it is ready to combust in the event of a non-routine flaring requirement. The flare is used for controlled safety releases of hydrogen and ammonia in non-routine situations. It is estimated that the flare will only be used once per year.
Response:	The statements above are correct, except WEGH2 has now chosen propane instead of butane for the pilot flare.
Supporting Documentation:	None

Response to PPD 13

Comment ID:	PPD 13
Department:	NL Environment and Climate Change
Branch/ Division:	Pollution Prevention Division
EIS Guidelines Reference (Where provided):	2.3.3 Operation and Maintenance: All aspects of the operation and maintenance procedures for the undertaking shall be described in this section of the EIS, including but not limited to the following: r) description of best management practices for the storage of waste dangerous goods/hazardous waste;
Reviewer's Comment:	Generated hazardous wastes will be stored on site in a separate and temporary hazardous waste storage area until removal by a licensed contractor for disposal off-site in accordance with regulatory requirements.
Response:	Thank you. No response required.
Supporting Documentation:	None

Response to PPD 14

Comment ID:	PPD 14
Department:	NL Environment and Climate Change
Branch/ Division:	Pollution Prevention Division
EIS Guidelines Reference (Where provided):	2.3.3 Operation and Maintenance: All aspects of the operation and maintenance procedures for the undertaking shall be described in this section of the EIS, including but not limited to the following: t) transport, storage, and use of all hazardous materials, fuels and lubricants required during operations and maintenance, including a description of best management practices for the storage of waste dangerous goods/hazardous waste (with respect to the hydrogen/ammonia plant);
Reviewer's Comment:	Standard environmental protection procedures, best management practices and mitigation measures have been developed for the Project.
Response:	Thank you. No response required.
Supporting Documentation:	None

Response to PDD 15

Comment ID:	PPD15
Department:	NL Environment and Climate Change
Branch/ Division:	Pollution Prevention Division
EIS Guidelines Reference (Where provided):	2.3.4 b) Decommissioning and Rehabilitation: The EIS shall...present an approach for decommissioning, which sets out a commitment from the Proponent to address...proposed decommissioning schedule and activities, including dismantling and removal of infrastructure and facilities (e.g., wind turbines, access roads, transmission lines, hydrogen/ammonia facility), and site rehabilitation, including a seed collection schedule and a revegetation plan (hydrogen/ammonia plant only);
Reviewer's Comment:	A plan has been developed for the decommissioning and rehabilitation of the hydrogen/ammonia plant and associated infrastructure.
Response:	Thank you. No response required.
Supporting Documentation:	None

Response to PPD 16

Comment ID:	PPD 16
Department:	NL Environment and Climate Change
Branch/ Division:	Pollution Prevention Division
EIS Guidelines Reference (Where provided):	6.3 a) Accidents and Malfunctions: The EIS will identify and describe the potential accidents and malfunctions related to the Project (hydrogen/ammonia plant), including an explanation of how those events were identified, potential consequences (including the potential environmental effects), the worst case scenarios as well as emergency scenarios that can reasonably be expected to occur, and the effects of these scenarios. The EIS will explain the potential quantity, mechanism, rate, form, and characteristics of the materials likely to be released into the environment during the malfunction and accident events. Potential accidents and malfunctions may include...accidental spills and/or releases of hydrogen, ammonia, chemicals, pesticides or any potentially hazardous substance on land or in air or water
Reviewer's Comment:	Unplanned hydrogen/ammonia release and fuel and hazardous materials spill are identified as potential accidents and malfunctions related to the hydrogen/ammonia plant. WEGH2 has prepared an Emergency Response and Contingency Plan for the Project, which outlines response procedures for potential accidents, malfunctions and emergency scenarios.
Response:	Thank you. No response required.
Supporting Documentation:	None

Response to PPD 17

Comment ID:	PPD 17
Department:	NL Environment and Climate Change
Branch/ Division:	Pollution Prevention Division
EIS Guidelines Reference (Where provided):	2.3.2 Construction: Details of materials, methods, schedule, and locations of all construction activities (including permanent and temporary infrastructure related to physical features) shall be described, including: b) ii. site preparation, clearing, blasting, etc., for the installation of... hydrogen and ammonia production facility, and ancillary buildings, structures and infrastructure;
Reviewer's Comment:	The hydrogen/ammonia production facility production facility is to be installed on a brownfield site (former Abitibi Mill Site). Construction tasks, site work components, prefabricated and modular components and specialized services have been identified for the production facility construction.
Response:	Thank you. No response required.
Supporting Documentation:	None

Response to PPD 18

Comment ID:	PPD 18
Department:	NL Environment and Climate Change
Branch/ Division:	Pollution Prevention Division
EIS Guidelines Reference (Where provided):	2.3.2 Construction: Details of materials, methods, schedule, and locations of all construction activities (including permanent and temporary infrastructure related to physical features) shall be described, including:
Reviewer's Comment:	Emissions resulting from the construction phase of the project are calculated using the projected equipment fleet, emission factors and estimates for equipment operation.
Response:	Thank you. No response required.
Supporting Documentation:	None

4.2 Water Resources Management Division

Response to WRM 1

Comment ID:	WRM 1
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	2.1 Study Area
Reviewer’s Comment:	Section 2.3.2 states “Final wind farm layouts will be dependent on results of the wind campaign and more detailed field investigations”. Without knowing specific locations can’t assess impact to public drinking water systems. No wind turbines will be allowed with unprotected or protected water supply areas.
Response:	The Wind Farm layout will remain within the Project Area previously assessed, and therefore no changes to the effects predictions for public drinking water systems are required. The re-design of the Port au Port Wind Farm layout removes turbines from the proposed expanded area of the Rouzes Brook Protected Public Water Supply Area (refer to Figure 2.1 in Chapter 2 of the EIS Amendment). The government-approved Environmental Protection Plan will outline how potential effects will be mitigated during construction and the government-approved Surface Water Monitoring Plan will be in place prior to construction to detect and report on potential effects.
Supporting Documentation:	Figure 2.1 Revised Turbine Layout to Avoid Expanded Rouzes Brook Protected Water Supply Area

Response to WRM 2

Comment ID:	WRM 2
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	4.2.6 Communities
Reviewer’s Comment:	Section 18.5.2.1 states “While water quality is generally good in LAA/RAA communities, there have been water shortages in Stephenville and Port au Port communities”, also mentioned in Section 18.2.2. There are a number of drinking water systems in the area that are on Boil Water Advisory or Non-consumption Advisory.

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Comment ID:	WRM 2
Response:	<p>WEGH2 notes there are a number of communities in the Project Area that experience water quality issues in addition to supply. The communities of Ship Cove, Lower Cove, and Jerry’s Nose had non-consumption advisories for select wells in 2022 due to lead concentrations exceeding the Newfoundland and Labrador drinking water quality guideline maximum acceptable concentration value (NLECC 2023).</p> <p>Reference:</p> <p>Government of Newfoundland and Labrador Environment Climate Change (NLECC). 2023. “Non-Consumption Advisory”. Accessed January 17, 2024. https://www.gov.nl.ca/ecc/files/2023_09_21_NCO.pdf</p>
Supporting Documentation:	None

Response to WRM 3

Comment ID:	WRM 3
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	4.2.6 Communities
Reviewer’s Comment:	<p>Section 18.5.2.1 – “During construction, the proposed accommodation facility associated with the Port au Port wind farm will be connected to the Town of Stephenville’s wastewater system. While certain communities within the LAA/RAA, including Corner Brook, are lacking wastewater treatment systems, Stephenville has a wastewater treatment that is in good condition and capable of handling additional demand.” How has it been determined that the wastewater treatment plant is capable of handling the additional flow from an additional 1500 people. Can the collection system and lift stations handle this increased flow? Will the increase in flow alter the Town of Stephenville’s monitoring and reporting requirements under the <i>Wastewater Systems Effluent Regulations</i>? A Permit to Construct under Section 36 of the <i>Water Resources Act</i> would be required to connect the temporary work camp to the municipal wastewater system if it can be verified that the wastewater collection system and treatment system can safely handle the additional demand. Modeling of the wastewater system will be required.</p>
Response:	<p>Through further consultation with the Town of Stephenville, it has been determined that the Town’s existing wastewater treatment facility does not have the capacity to accommodate a camp of 1500 people. While the exact location of the camp has yet to be confirmed, WEGH2 is evaluating “the Ramp” site near the Stephenville airport. WEGH2 will therefore install its own waste treatment facility near the camp site within existing zoning and permitting requirements. Solids will be removed by a local licensed handling facility for disposal at an approved location.</p>
Supporting Documentation:	None

Response to WRM 4

Comment ID:	WRM 4
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	4.2.6 Communities
Reviewer’s Comment:	<p>Section 18.5.2.1 - Temporary work camp (for 1200 to 1500 workers) will be connected to the Town of Stephenville’s public drinking water system. Two new wells are proposed to be able to meet the increased demand. A Permit to Construct under Section 37 of the Water Resources Act would be required to connect the temporary work camp to the municipal water system.</p> <p>Modeling of the water system will be required to verify that the Town of Stephenville’s drinking water system can safely provide the additional demand.</p>
Response:	<p>Please see Appendix WRM4-A for detail on how potable water will be provided to the temporary work camp in Stephenville via two new groundwater wells. Non-domestic well permits are required to drill new municipal wells. Once installed, water chemistry samples from the monitoring wells will be analyzed at least bi-annually to ensure safe drinking water. Samples will also be analysed annually for perfluorooctane (PFOS) and perfluorooctanoic acid (PFOA).</p>
Supporting Documentation:	Appendix WRM4-A: Fracflow Technical Memo on Expansion of Town of Stephenville Potable Water Supply

Response to WRM 5

Comment ID:	WRM 5
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	<p>4.2.6 Communities Section 18.5.2.1 - The temporary accommodations camp will be connected to the Town of Stephenville’s potable water supply and wastewater system.</p> <p>For a facility accommodating approximately 1,200 to 1,500 workers, the increase in potable water demand is expected to be approximately 480 to 500 m³/day. This increased demand will require the Town of Stephenville to install two additional groundwater wells to meet peak demand</p>
Reviewer’s Comment:	<p>Can the aquifer that supplies Stephenville’s municipal water sustain the added water requirement? Verification is required that this is possible and sustainable and if not, alternative options are required.</p>

Project Nujio’qonik : Amendment to the Environmental Impact Statement

Comment ID:	WRM 5
Response:	Please see Appendix WRM4-A.
Supporting Documentation:	Appendix WRM4-A: Fracflow Technical Memo on Expansion of Town of Stephenville Potable Water Supply

Response to WRM 6

Comment ID:	WRM 6
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	2.3.1 General Layout
Reviewer’s Comment:	Proposed location of Transmission Main passes through Drilled Well/Berry Head PPWSA for Port au Port East; Stephenville PPWSA; Stephenville Crossing PPWSA; and Dribble Brook PPWSA for St. George’s. A Permit for Development within a Protected Public Water Supply Area will be required under Section 39 or 61 of the Water Resources Act. Policy for Treated Utility Poles in Water Supply Areas must be adhered to.
Response:	Noted. Thank you.
Supporting Documentation:	None

Response to WRM 7

Comment ID:	WRM 7
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	2.3.1 General Layout
Reviewer’s Comment:	Caribou Brook Dam is approximately 1900 metres from the closest wind turbine; Unnamed Dam in Piccadilly Slant is approximately 1500 metres from closest wind turbine; Sheaves Cove Dam is approximately 1300 metres from the closest wind turbine; Unnamed Dam in Port au Port East is approximately 2500 metres from the closest wind turbine. Is there any anticipated impact on these dams?

Project Nujio’qonik : Amendment to the Environmental Impact Statement

Comment ID:	WRM 7
Response:	Project work will occur outside of defined municipal watersheds, so there is low risk to existing dams. Wind turbine construction and operation in excess of 1000m from dams pose no risk. WEGH2 does not anticipate adverse effects to these dams. There is substantial distance between dams and potential blasting locations, well beyond the radius where vibrations would be a concern. The detailed road design for the Project will incorporate best practices for water management and surface water management and as such no effects to dams are anticipated.
Supporting Documentation:	None

Response to WRM 8

Comment ID:	WRM 8
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	2.3.1 General Layout
Reviewer’s Comment:	Section 2.3.2 – Proponent states that they will be using existing (repurposed) roads to access sites. Those roads must be identified to determine if there will be any impact to public or private drinking water systems.
Response:	Figure 2.3 of the Environmental Impact Statement (EIS) shows the Codroy Wind Farm layout (including access roads). The layout for the Port au Port Wind Farm has been updated to remove turbines and the updated layouts (including access roads) can be seen in Figure 2.1 and Figure 2.2 (Chapter 2) of this EIS Amendment. The road layout will remain within the Project Area previously assessed, and therefore no changes to the effects predictions for public or private drinking water systems because of roads are required. The layout will not overlap public water supply areas. The government-approved Environmental Protection Plan will outline how potential effects will be mitigated during construction and the government-approved Surface Water Monitoring Plan will be in place prior to construction to detect and report on unmitigated potential effects.
Supporting Documentation:	Figure 2.1 Revised Turbine Layout to Avoid Expanded Rouzes Brook Protected Water Supply Area Figure 2.2 Revised Turbine Layout of Pine Tree / Table Mountain due to Proximity to Stephenville Airport

Response to WRM 9

Comment ID:	WRM 9
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	2.3.1 General Layout
Reviewer’s Comment:	12 wind turbines, and associated access roads and collector system, are indicated within the proposed expanded area of the Rouzes Brook Protected Public Water Supply Area that is currently with ILUC. As this is within the natural drainage area for this public water supply these wind turbines must be relocated to outside of the watershed area.
Response:	The re-design of the Port au Port Wind Farm layout will remove turbines from the proposed expanded area of the Rouzes Brook Protected Public Water Supply Area. Refer to Figure 2.1 in Chapter 2 of this EIS Amenment
Supporting Documentation:	Figure 2.1 Revised Turbine Layout to Avoid Expanded Rouzes Brook Protected Water Supply Area

Response to WRM 10

Comment ID:	WRM 10
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	2.3.1 General Layout
Reviewer’s Comment:	Section 2.5.1 – Project includes two potential locations for a batch plant but precise locations will be determined based on the final schedule, as well as batch plant specifications and laydown constraints. Exact locations should be provided so impacts can be considered. Which local access road near Mainland is being proposed? As well, where will the required water come from? What is the expected water requirement?
Response:	Please note that batch plant locations have been selected as indicative / preliminary siting locations, however WEGH2 believe the geology will support water wells. One batch plant is proposed to be located directly south of Gabriel Construction’s pit (directly south of the abandoned Aguathuna quarry) (369000 m E, 5379000 m N) (Figure WRM 10-1) and a second inland of West Bay, just east & south of the municipal water supply watershed in that area (353000 m E, 5386000 m N) (Figure WRM 10-2).

Comment ID:	WRM 10
	WEGH2 estimates a water requirement of approximately 20,000M ³ for each batch plant, sourced from new groundwater wells.
Supporting Documentation:	Figure WRM10.1 Potential Aguathuna Batch Plant Location Figure WRM10.2 Potential West Bay Batch Plant Location



Figure WRM10.1 Potential Aguathuna Batch Plant Location



Figure WRM10.2 Potential West Bay Batch Plant Location

Response to WRM 11

Comment ID:	WRM 11
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	2.3.1 General Layout
Reviewer's Comment:	Section 2.6.1 – What is the location of the proposed maintenance building?
Response:	The maintenance building will be near the fabrication shed close to the port facility.
Supporting Documentation:	None

Response to WRM 12

Comment ID:	WRM 12
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	2.3.1 General Layout
Reviewer's Comment:	Figure 2.42 shows the flows of the hydrogen/ammonia plant including inflows and outflows - figure is showing the Municipal water supply as an inflow - this doesn't match Table 2.7 which states the inflow is an industrial water supply. Outflow from water purification should be water treatment residuals rather than water discharge - same for Table 2.7. On page 2.77 it is referred to as wastewater.
Response:	Agreed. Figure 2.42 in the Environmental Impact Statement (EIS) should indicate the industrial water supply as the inflow, rather than the Municipal water supply. Figure 2.42 and Table 2.7 in the EIS should indicate outflow from water purification as water treatment residuals or effluent rather than water discharge.
Supporting Documentation:	None

Response to WRM 13

Comment ID:	WRM 13
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	2.3 Project Description
Reviewer's Comment:	Figure 2.45 - Overview of Hydrogen / Ammonia Plant Water Use needs to be revised. It doesn't show how water gets to the RO treatment step.
Response:	Please refer to Appendix WRM13-A for a report on industrial water infrastructure. .
Supporting Documentation:	Appendix WRM13-A: 2023 Fracflow Industrial Water Demand and Supply Assessment

Response to WRM 14

Comment ID:	WRM 14
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	2.3 Project Description
Reviewer's Comment:	Page 2.79 - What is considered winter months? Figure shows highest expected consumption in October? Figure 2.46 - units need to be added to this figure.
Response:	WEGH2 notes that the reference in the Environmental Impact Statement (EIS) should say "fall and winter" or more accurately "September to January" as this section is indicating seasonal production based on available wind energy.
Supporting Documentation:	None

Response to WRM 15

Comment ID:	WRM 15
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	
Reviewer’s Comment:	Page 2.80 - Noel’s Pond has a dam and the Town of Stephenville is identified as the dam owner. Will proponent be taking over as dam owner and be responsible for operation and maintenance of this dam? Will Town of Stephenville remain as owner and will they be willing to approve changes to the dam and increase flood risk to the Town? Any changes to the dam will require development of dam break inundation mapping and will require a permit under Section 48 of the <i>Water Resources Act</i> .
Response:	The Town of Stephenville will remain the owner of the dam at Noel’s Pond. WEGH2 and the Town are in discussions regarding the terms of such an arrangement.
Supporting Documentation:	None

Response to WRM 16

Comment ID:	WRM 16
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	
Reviewer’s Comment:	Page 2.83 refers to an earthen berm on Gull (Mine) Pond that is retaining water. Is this berm considered a dam? What is the location of the earthen berm? Changes to this structure may require a permit under Section 48 of the <i>Water Resources Act</i> .
Response:	The Town of Stephenville will remain the owner of the dam at Gull (Mine) Pond. WEGH2 and the Town are in discussions regarding the terms of such an arrangement. Please see Figure WRM16.1 for the berm location.
Supporting Documentation:	Figure WRM 16.1 Location of Berms Surrounding Gull (Mine) Pond



Figure WRM 16.1 Location of Berms Surrounding Gull (Mine) Pond

Response to WRM 17

Comment ID:	WRM17
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	
Reviewer’s Comment:	Page 2.83 – Work on Noels Pond includes installation of water control gates and a fish ladder or bypass and removal of driftwood debris. This will require a permit under Section 48 of the Water Resources Act.
Response:	WEGH2 acknowledges the regulatory requirement under the <i>Water Resources Act</i> .
Supporting Documentation:	None

Response to WRM 18

Comment ID:	WRM 18
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	
Reviewer’s Comment:	Page 2.86 - Maps also show the areas that would be flooded by raising the water level in each pond by 1 m and then by an additional 1 m. Can the dam on Noel’s Pond handle this increase in water levels? How will this impact flooding in the area?
Response:	Please refer to Appendix WRM13-A and Appendix WRM18-A.
Supporting Documentation:	Appendix WRM13-A: 2023 Fracflow Industrial Water Demand and Supply Assessment Appendix WRM18-A: Noels Pond Water Levels

Response to WRM 19

Comment ID:	WRM 19
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	2.3.3 Operation and Maintenance
Reviewer's Comment:	Table 9.6 - Operation and Maintenance - Presence, Operation, and Maintenance of Wind Farms (including wind turbines, access roads, and collector systems) should be assessed for change in surface water quality.
Response:	The omission of a check mark in Table 9.6 of the Environmental Impact Statement (EIS) to signify a potential interaction between the Presence, Operation and Maintenance of Wind Farms and surface water quality was an oversight. However, this interaction was assessed in Section 9.5.2.2 of the EIS. Operation and maintenance of the wind farms will require use of turbine gravel pads and access roads by Project vehicles and could result in suspended sediments and dust from the unpaved roadbed and turbine pad areas being carried into adjacent waterbodies, thereby affecting water quality. However, with the application of standard mitigation measures and best management practices to reduce erosion and sedimentation, and dust emissions, residual effects are predicted to be low in magnitude, restricted to the Local Assessment Area, medium term duration, occur continuously and be reversible.
Supporting Documentation:	None

Response to WRM 20

Comment ID:	WRM 20
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	7.2.1 Emergency Response/Contingency Plan
Reviewer's Comment:	Page 2.102 and 2.103 - Failure of dam or water control structures should be included as part of the Emergency Response / Contingency Plan.
Response:	Please refer to Appendix WRM20-A: Flood Emergency Response Plan.
Supporting Documentation:	Appendix WRM20-A: Flood Emergency Response Plan

Response to WRM 21

Comment ID:	WRM 21
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	3.1 Alternatives to the Undertaking
Reviewer’s Comment:	Table 3.3 - Is the Lewis Hills site really a comparison when it was removed from the Crown lands bid process?
Response:	<p>During the Call for Land Nominations (NL government process) no lands north of Fox Island River (including the Lewis Hills) were nominated for an eligible project. As such, this area was not included in the Call for Bids Area contained in the Wind Land Reserve. Prior to the Crown Lands bid process, the Lewis Hills site was considered for development by WEGH2 and was identified as a potential future development site in the Environmental Registration for the Project. The criteria WEGH2 used to identify potential Wind Farm sites were:</p> <ul style="list-style-type: none"> • Proximity to the selected brownfield hydrogen / ammonia plant location in Stephenville limiting the distance of transmission line infrastructure required • Availability and extent of Crown land to accommodate the required number of turbines to provide the 2 GW electricity demands of the Project • Ability to support access requirements for the transportation of turbine components and equipment • Reliable onshore wind speed distribution equivalent to offshore sites globally <p>During further evaluation the Lewis Hill site was identified as being partially within a Protected Public Water Supply Area for Humber Arm South, prohibitive in terms of access and was not considered economically viable for development. Since no lands were nominated in the Lewis Hills area, it was therefore removed from further consideration.</p>
Supporting Documentation:	None

Response to WRM 22

Comment ID:	WRM 22
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	6.0 Environmental Effects
Reviewer’s Comment:	Table 5.1 Scoping Considerations - should have included effects of wastewater discharge from the accommodations facility to the municipal wastewater system or alternate receiving location.
Response:	<p>Table 5.1 in the Environmental Impact Statement (EIS) considers “municipal infrastructure or services to be used by the Project and the capacity of the infrastructure and services to support the Project (s.6.2(b))” under the Communities Valued Ecosystem Component (VEC). As indicated in the response to WRM 28, Table 18.2 in the EIS includes the potential effect “change in community infrastructure and services”, which includes community water and wastewater systems. Potential effects on local water and wastewater systems are assessed in Section 18.5.2 of the EIS.</p> <p>Since submission of the EIS and as described in Chapter 2 of this EIS Amendment, WEGH2 consulted further with the Town of Stephenville and determined that the Town’s existing wastewater treatment facility does not have the capacity to accommodate a camp of 1500 people. While the exact location of the camp has yet to be confirmed, WEGH2 is evaluating “the Ramp” site near the Stephenville airport. WEGH2 will install its own waste treatment facility near the camp site within existing zoning and permitting requirements. Solids will be removed by a local licensed handling facility for disposal at an approved location.</p>
Supporting Documentation:	None

Response to WRM 23

Comment ID:	WRM 23
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	7.2.8.2 Groundwater and Surface Water Monitoring Plan
Reviewer’s Comment:	Table 9.3 - Did the proponent use source water quality data only from the NL Water Resources Portal? When referencing "stations" do they mean source samples from the PPWSAs?
Response:	<p>Water quality data for Port au Port came from the Water Resources Management Division’s website, Newfoundland and Labrador Water Resources Portal (WRMD 2023). In particular, the Community Water Resource Reports for Source Water Nutrients and Metals and Source Water Physical Parameters and Major Ions were referenced and summarized. The term “stations” is intended to refer to the sample locations for the source water.</p> <p>Water Quality Data for Codroy Wind Farm comes from a single Ambient Water Quality station, not located in a Protected Public Water Supply Area (PPWSA), Grand Codroy River below Overfall Brook (Station NF02ZA0006) (WRMD 2021).</p> <p>Water Quality Data from Stephenville was collected by FracFlow and summarized in their report Active Storage and Water Quality Noels Pond, Muddy Pond and Gull (Mine) Pond Stephenville, NL (FFC 2022).</p> <p>Table 9.3 of the Environmental Impact Statement (EIS) is a summary of the key findings of the Aquatic Environment Baseline Study (Appendix BSA -2 of the EIS), and full data analysis can be found there.</p> <p>References:</p> <p>Fracflow Consultants Inc (FFC). 2022. Active Storage and Water Quality Noels Pond, Muddy Pond and Gull (Mine) Pond Stephenville, NL</p> <p>Government of Newfoundland and Labrador Department of Environment Climate Change and Municipality Water Resources Management Division (WRMD). 2021. “Water Quality Trends in Selected Surface Water Bodies of Newfoundland & Labrador – Phase 2”. Accessed September 2023. https://www.gov.nl.ca/ecc/files/Water_Quality_Trend_Report_Part_2_2021-1.pdf</p> <p>Water Resources Management Division (WRMD). 2023. “Newfoundland and Labrador Water Resources Portal: Community Water Resources Reports” Accessed September 2023. https://maps.gov.nl.ca/water/</p>
Supporting Documentation:	None

Response to WRM 24

Comment ID:	WRM 24
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	7.2.8.2 Groundwater and Surface Water Monitoring Plan
Reviewer’s Comment:	Table 9.5 - Change in Surface Water and Groundwater Quality - should also consider physical parameters in addition to chemical parameters.
Response:	<p>In addition to the chemical changes in water quality, changes in physical parameters (e.g., temperature, conductivity, total suspended solids [TSS], and turbidity) will be monitored as part of the surface water monitoring program.</p> <p>WEGH2 is committed to developing site-specific mitigation and monitoring plans, including the Groundwater and Surface Water Monitoring Plans prior to Project construction at that site. The plans will incorporate mitigation measures and monitoring commitments in the Environmental Impact Statement (EIS) and this EIS Amendment, will reflect applicable conditions of release from the environmental assessment process, and will include information on how and when updates to the plans will be made. The plans will be developed in consultation with applicable regulators and will be submitted for review prior to Project construction at that site. WEGH2 is committed to an adaptive management approach, and as such, these plans are considered “living” documents that will be updated as applicable to capture Project design updates and results of ongoing environmental monitoring. Draft Tables of Contents (TOCs) for the Groundwater and Surface Water Monitoring Plans are provided in Appendix 2-G and Appendix 2-H respectively of this EIS Amendment.</p>
Supporting Documentation:	<p>Appendix 2-G Groundwater Monitoring Plan Draft TOC</p> <p>Appendix 2-H Surface Water Monitoring Plan Draft TOC</p>

Response to WRM 25

Comment ID:	WRM 25
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	7.2.8.2 Groundwater and Surface Water Monitoring Plan
Reviewer’s Comment:	Section 9.2.1.2 - 11 surface water quality sites will be established. Will all PPWSAs be monitored? What is the frequency of monitoring? Will there be permanent equipment installed?

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Comment ID:	WRM 25
Response:	<p>The Port au Port Protected Public Water Supply Areas (PPWSAs) will be incorporated into the Surface Water Monitoring Plan (SWMP). The frequency of monitoring and equipment to be installed will be discussed in consultation with the Water Resources Management Division during the development of the Plan.</p> <p>WEGH2 is committed to developing site-specific mitigation and monitoring plans, including the Groundwater Monitoring Plan (GWMP) and SWMP prior to Project construction at that site. The plans will incorporate mitigation measures and monitoring commitments in the Environmental Impact Statement (EIS) and this EIS Amendment, will reflect applicable conditions of release from the environmental assessment process, and will include information on how and when updates to the plans will be made. The plans will be developed in consultation with applicable regulators and will be submitted for review prior to Project construction at that site. WEGH2 is committed to an adaptive management approach, and as such, these plans are considered “living” documents that will be updated as applicable to capture Project design updates and results of ongoing environmental monitoring. Draft Tables of Contents (TOC) for the GWMP and SWMP are provided in Appendix 2-G and Appendix 2-H, respectively, of this EIS Amendment.</p>
Supporting Documentation:	<p>Appendix 2-G Groundwater Monitoring Plan Draft TOC</p> <p>Appendix 2-H Surface Water Monitoring Plan Draft TOC</p>

Response to WRM 26

Comment ID:	WRM 26
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	7.2.8.2 Groundwater and Surface Water Monitoring Plan
Reviewer’s Comment:	Section 9.5.2.1 - If the sedimentation ponds meet the definition of a dam or very small dam a permit under Section 48 of the Water Resources Act would be required. Discharge would have to meet Environmental Control Water and Sewage Regulations, Schedule A, if discharged to a waterbody.
Response:	Comment noted. WEGH2 will consult with the Water Resources Management Division during permit application processes to confirm compliance with applicable requirements of the <i>Water Resources Act</i> .
Supporting Documentation:	None

Response to WRM 27

Comment ID:	WRM 27
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	7.2.8.2 Groundwater and Surface Water Monitoring Plan
Reviewer’s Comment:	Section 9.5.2.1 – Wind turbines proposed for the expanded watershed area of Rouze’s Brook PPWSA currently with ILUC should be removed.
Response:	Please note that WEGH2 has updated the layout for wind turbines in the vicinity of Rouze’s Brook to remove turbines from the expanded Protected Public Water Supply Area. Please refer to Figure 2.1 (Chapter 2) of this EIS Amendment.
Supporting Documentation:	Figure 2.1 Revised Turbine Layout to Avoid Expanded Rouzes Brook Protected Public Water Supply Area

Response to WRM 28

Comment ID:	WRM 28
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	Table 9.12
Reviewer’s Comment:	Table 9.12 - would also have to adhere to Policy for Land and Water Related Developments in PPWSA. Should also add to Tables 9.13 and 9.14 as work may need to be done within PPWSAs during operation stage.
Response:	<p>Effects associated with the construction, operation and decommissioning and reclamation of the 230 kV transmission lines will be managed in accordance with the Policy for Land and Water Related Developments in Protected Public Water Supply Areas (NLDECC 1999), as well as through application of best practices in accordance with Water Resources Management Division’s Environmental Guidelines for General Construction Practices (2018) and other standard mitigation measures described in Section 9.4 of the Environmental Impact Statement.</p> <p>References:</p> <p>Department of Environment and Climate Change, Water Resources Management Division. 2018. Environmental Guidelines for General Construction Practices. Available online at: https://www.gov.nl.ca/ecc/files/waterres-regulations-appforms-chapter10.pdf</p>

Project Nujio’qonik : Amendment to the Environmental Impact Statement

Comment ID:	WRM 28
	Department of Environment and Climate Change, Water Resources Management Division. 1999. Policy for Land and Water Related Developments in Protected Public Water Supply Areas. Available online at: https://www.gov.nl.ca/ecc/waterres/regulations/policies/water-related/
Supporting Documentation:	None

Response to WRM 29

Comment ID:	WRM 29
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	Table 18.2
Reviewer’s Comment:	Table 18.2 should include impacts to public water and wastewater systems. Have already identified water shortages as an issue in the area.
Response:	Table 18.2 of the Environmental Impact Statement (EIS) includes the potential effect “change in community infrastructure and services” which includes community water and wastewater systems. Potential effects on local water and wastewater systems are assessed in Section 18.5.2 of the EIS. Please also refer to response provided for WRM 22.
Supporting Documentation:	None

Response to WRM 30

Comment ID:	WRM 30
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	Table 18.4
Reviewer’s Comment:	Table 18.4 - ID#36 - 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. - Will also need to be done in accordance with the Policy for Land and Water Related Developments in PPWSA

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Comment ID:	WRM 30
Response:	<p>Project activities in the Protected Public Water Supply Areas (PPWSAs) consist of the construction, operation and decommissioning and reclamation of the 230 kV transmission lines in the Port au Port East, Stephenville, Stephenville Crossing, and St. George’s PPWSAs. These activities will be managed in accordance with the Policy for Land and Water Related Developments in the PPWSAs (NLDECC 1999), as well as through application of best practices in accordance with the Water Resources Management Division’s Environmental Guidelines for General Construction Practices (2018) and other standard mitigation measures described in Section 9.4 of the Environmental Impact Statement.</p> <p>References:</p> <p>Department of Environment and Climate Change, Water Resources Management Division. 2018. Environmental Guidelines for General Construction Practices. Available online at: https://www.gov.nl.ca/ecc/files/waterres-regulations-appforms-chapter10.pdf</p> <p>Department of Environment and Climate Change, Water Resources Management Division. 1999. Policy for Land and Water Related Developments in Protected Public Water Supply Areas. Available online at: https://www.gov.nl.ca/ecc/waterres/regulations/policies/water-related/</p>
Supporting Documentation:	None

Response to WRM 31

Comment ID:	WRM 31
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	4.3.4 Land and Resource Use
Reviewer’s Comment:	Section 20.2.1 - Unprotected public water supply areas should also have been included.
Response:	Protected Public Water Supplies, Unprotected Public Water Supplies, and ILUC Water Supplies are discussed in Chapter 8.0, Groundwater, of the Environmental Impact Statement (EIS). The locations of these features are illustrated on Figures 8.1 to 8.3 of the EIS, along with drilled wells. Refer also to Figure 2.1 and Appendix WRM33-A of this EIS Amendment for the location of public and unprotected water supply areas relative to the updated Project layout.
Supporting Documentation:	<p>Figure 2.1 Revised Turbine Layout to Avoid Expanded Rouzes Brook Protected Public Water Supply Area</p> <p>Appendix WRM33-A Public Water Supply Areas Intersected by the Proposed 230 kV Transmission Line (Mapbook)</p>

Response to WRM 32

Comment ID:	WRM 32
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	
Reviewer’s Comment:	PPWSA boundaries are approximate and will need to be groundtruthed and marked before any development is undertaken adjacent to a watershed.
Response:	Where ground truthing of the Protected Public Water Supply Areas is required, WEGH2 will do so before development is undertaken adjacent to the watershed. WEGH2 will consult with Water Resources Management Division during permit application processes to confirm compliance with applicable requirements of the <i>Water Resources Act</i> , including policy guidelines established under section 39 of the Act (e.g., Policy for Land and Water Related Developments in Protected Public Water Supply Areas).
Supporting Documentation:	None

Response to WRM 33

Comment ID:	WRM 33
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	6.2 Predicted Environmental Effects of the Undertaking
Reviewer’s Comment:	Section 20.2.2.1 – Cointre’s Brook PPWSA is protected under the Water Resources Act and no wind turbines will be permitted within the PPWSA. Proposed expansion of Rouze’s Brook watershed area is with ILUC and must be avoided for wind turbines. Should list all 4 PPWSAs that are intersected with the transmission line (Port au Port East; Stephenville, Stephenville Crossing; St. George’s)
Response:	Turbines will be excluded from Cointre’s Brook Protected Public Water Supply Area (PPWSA) and the proposed expansion of Rouze’s Brook PPWSA (refer to Figure 2.1 for the updated Port au Port Wind Farm layout). Proposed transmission lines will intersect the following PPWSAs: Port au Port East (Berry Head Watershed WS-G-0861, WS-S-0572), Stephenville (Well Field WS-G-0716), Stephenville Crossing (Well Fields 1 & 2 WS-G-0717), and St. George’s (Dribble Brook WS-S-0689) (Appendix WRM33-A).

Project Nujio’qonik : Amendment to the Environmental Impact Statement

Comment ID:	WRM 33
Supporting Documentation:	Figure 2.1 Revised Turbine Layout to Avoid Expanded Rouzes Brook Protected Public Water Supply Area Appendix WRM 33-A: Public Water Supply Areas Intersected by the Proposed 230 kV Transmission Line

Response to WRM 34

Comment ID:	WRM 34
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	
Reviewer's Comment:	<p>Page 20.55 and Table 20.6 - "WEGH2 will limit development in water supply intake areas, including PPWSAs, where practicable and no development will occur in PPWSAs that are considered High Risk (e.g., Piccadilly Head – Unnamed Brook, Port-au-Port West-Aguathuna-Felix Cove – Jim Rowe’s Brook). Two proposed ILUC Protected Surface water Legal Boundaries are intersected by the Project Area (i.e., 4.3 km²). WEGH2 have revised Project boundaries in some instances to avoid carrying out Project activities inside the PPWSAs. The presence of new access routes during the construction phase may lead to an increase in traffic and use through PPWSAs and could potentially cause adverse effects on water supplies. Where practical, WEGH2 will limit other motor vehicle access during construction phase for public safety purposes. The limits and additional construction vehicle traffic will be temporary only for the construction phase. WEGH2 will follow the requirements of permitting under section 39 of the <i>Water Resources Act</i> for development in public water supply areas and near water intakes and wellheads. With mitigation measures applied, residual effects on PPWSAs are anticipated to be low in magnitude."</p> <p>Shape files included with the EIS don't indicate development work within PPWSAs with the exception of a few transmission main locations and the expanded area of the Rouze's Brook PPWSA currently with ILUC. All development activities planned for protected and unprotected public water supply areas should be provided in the EIS. Any changes to these shape files would have to be assessed.</p>
Response:	Refer to response for WRM 33.
Supporting Documentation:	Figure 2.1 Revised Turbine Layout to Avoid Expanded Rouzes Brook Protected Public Water Supply Area Appendix WRM 33-A: Public Water Supply Areas Intersected by the Proposed 230 kV Transmission Line

Response to WRM 35

Comment ID:	WRM35
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	6.2 Predicted Environmental Effects of the Undertaking
Reviewer's Comment:	Table 20.4 - ID#365 and 366 - No wind turbines within protected or unprotected watershed areas used for public drinking water systems.
Response:	WEGH2 has excluded the siting of wind turbines within watersheds used for public drinking water systems. A re-design of the Port au Port Wind Farm has removed turbines from the proposed expanded area of the Rouzes Brook Protected Public Water Supply Area (refer to Figure 2.1 of this EIS Amendment).
Supporting Documentation:	Figure 2.1 Revised Turbine Layout to Avoid Expanded Rouzes Brook Protected Public Water Supply Area

Response to WRM 36

Comment ID:	WRM36
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	4.2 Existing Environment and 4.3 Baseline studies
Reviewer's Comment:	<p>Appendix 8A It is stated in the EIS that "The model confirms that Muddy Pond and Noels Pond both have very low permeability pond sediments that produce a perched pond condition.</p> <p>Muddy Pond and Noels Pond have little to no impact on the underlying water table elevations. This is confirmed by the actual water level measurements where the water level in Muddy Pond and Noels Pond are approximately 21 m while the average non-pumping water levels/hydraulic heads in the underlying aquifer ranges from 11 to 13 m." This conclusion will need to be verified and monitoring of groundwater in the vicinity of muddy pond and the MOWI wells will need to be established.</p>
Response:	<p>This conclusion will be verified by a test / monitoring well in the vicinity of Muddy Pond. Test well location and depth will be determined in consultation with the Water Resources Management Division (WRMD). This well will likely, in future, be used as part of the Real Time Water Quality Monitoring Network.</p> <p>Please see attached Appendix WRM36-A for the context of how this statement was made. Groundwater and Surface Water Monitoring Plans will be developed in consultation with WRMD (refer to Appendices 2-G and 2-H of this EIS Amendment for draft Tables of Contents (TOC) for these Plans).</p>

Project Nujio’qonik : Amendment to the Environmental Impact Statement

Comment ID:	WRM36
Supporting Documentation:	Appendix WRM36-A: Fracflow_EIS-Input on Groundwater Impacts Appendix 2-G Groundwater Monitoring Plan Draft TOC Appendix 2-H Surface Water Monitoring Plan Draft TOC

Response to WRM 37

Comment ID:	WRM 37
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	m) procedures for regular ambient climate, water quantity and quality monitoring;
Reviewer’s Comment:	EIS states “Groundwater and Surface Water Monitoring Program, Avifauna Impacts Mitigation and Monitoring Plan, and the Outfitter Environmental Effects Monitoring Plan are being submitted post-EIS submission.” Not submitted with EIS
Response:	WEGH2 is committed to developing site-specific mitigation and monitoring plans, including the Groundwater (GWMP) and Surface Water Monitoring Plans (SWMP), Avifauna Impacts Mitigation and Monitoring Plan (AIMMP) and the Outfitter Environmental Effects Monitoring Plan (OEEMP) prior to Project construction at each site. The plans will incorporate mitigation measures and monitoring commitments in the Environmental Impact Statement (EIS) and this EIS Amendment, will reflect applicable conditions of release from the environmental assessment process, and will include information on how and when updates to the plans will be made. The plans will be developed in consultation with applicable regulators and will be submitted for review prior to Project construction at that site. WEGH2 is committed to an adaptive management approach, and as such, these plans are considered “living” documents that will be updated as applicable to capture Project design updates and results of ongoing environmental monitoring. Draft Tables of Contents (TOC) for the Species at Risk Impacts Mitigation and Monitoring Plan, GWMP, SWMP, AIMMP, and OEEMP are provided in Appendices 2-F to 2-J of this EIS Amendment.
Supporting Documentation:	Appendix 2-F Species at Risk Impacts Mitigation and Monitoring Plan Draft TOC Appendix 2-G Groundwater Monitoring Plan Draft TOC Appendix 2-H Surface Water Monitoring Plan Draft TOC Appendix 2-I Avifauna Impacts Mitigation and Monitoring Plan Draft TOC Appendix 2-J Outfitter Effects Monitoring Plan Draft TOC

Response to WRM 38

Comment ID:	WRM 38
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	4.3.2 v Aquatic Environment: Groundwater and surface water monitoring plan to ensure the long-term security of the water resources
Reviewer’s Comment:	EIS states “Groundwater and Surface Water Monitoring Program, Avifauna Impacts Mitigation and Monitoring Plan, and the Outfitter Environmental Effects Monitoring Plan are being submitted post-EIS submission.” Not submitted with EIS
Response:	WEGH2 is committed to developing site-specific mitigation and monitoring plans, including the Groundwater (GWMP) and Surface Water Monitoring Plans (SWMP), Avifauna Impacts Mitigation and Monitoring Plan (AIMMP) and the Outfitter Environmental Effects Monitoring Plan (OEEEMP) prior to Project construction at each site. The plans will incorporate mitigation measures and monitoring commitments in the Environmental Impact Statement (EIS) and this EIS Amendment, will reflect applicable conditions of release from the environmental assessment process, and will include information on how and when updates to the plans will be made. The plans will be developed in consultation with applicable regulators and will be submitted for review prior to Project construction at that site. WEGH2 is committed to an adaptive management approach, and as such, these plans are considered “living” documents that will be updated as applicable to capture Project design updates and results of ongoing environmental monitoring. Draft Tables of Contents (TOC) for the Species at Risk Impacts Mitigation and Monitoring Plan, GWMP, SWMP, AIMMP, and OEMP are provided in Appendices 2-F to 2-J of this EIS Amendment.
Supporting Documentation:	Appendix 2-F Species at Risk Impacts Mitigation and Monitoring Plan Draft TOC Appendix 2-G Groundwater Monitoring Plan Draft TOC Appendix 2-H Surface Water Monitoring Plan Draft TOC Appendix 2-I Avifauna Impacts Mitigation and Monitoring Plan Draft TOC Appendix 2-J Outfitter Effects Monitoring Plan Draft TOC

Response to WRM 39

Comment ID:	WRM 39
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	6.2 Predicted Environmental Effects of the Undertaking C iii. effects of water withdrawal for the hydrogen and ammonia production facility on known contaminated sites;

Project Nujio’qonik : Amendment to the Environmental Impact Statement

Comment ID:	WRM 39
Reviewer’s Comment:	There is only mention of one existing contaminated site (landfill near mine pond) in the section referenced. Other areas of contamination have been identified in the area during EA 1975
Response:	<p>WEGH2 reviewed the environmental assessment (EA) documentation submitted to the provincial EA Division with respect to the proposed Indian Head Hatchery Expansion Project, located at Port Harmon in Stephenville. The proponent completed Phase I and Phase II Environmental Site Assessments (ESA) (Northern Harvest Smelt Ltd. 2018) at the sites that were previously used for industrial purposes. The Phase I ESA identified seven potential sources of contamination at the site and the Phase II confirmed hydrocarbon contamination at three blocks of land.</p> <p>The Phase I / II Environmental Site Assessments conducted for the Indian Head Hatchery in 2018 identified several areas of potential and actual contamination in groundwater, primarily in areas of the old Abitibi mill, but also including a landfill to the west / northwest of Gull (Mine) Pond. An assessment of the industrial water supply (Appendix WRM36-A) shows elevated levels of total dissolved solids and a number of metal parameters in groundwater in the vicinity of the landfill. However, the assessment also indicates that Noels Pond, Muddy Pond, and Gull (Mine) Pond are perched ponds, which are hydraulically isolated from groundwater that may be flowing from these contaminated sources. Numerical modelling completed as part of the assessment indicates that potential changes in water levels in the ponds caused by water withdrawal for the hydrogen ammonia production facility will have no significant effect on the groundwater system and will therefore not interact with known contaminated sites.</p> <p>Reference:</p> <p>Northern Harvest Smelt Ltd. 2018. Indian Head Hatchery Expansion Project Registration Document, Appendix F, Part1-1. Available online: https://www.gov.nl.ca/ecc/files/env-assessment-projects-y2018-1975-1975-appendix-f-part1-part1.pdf</p>
Supporting Documentation:	Appendix WRM36-A FracFlow EIS Input on Groundwater Impacts.

Response to WRM 40

Comment ID:	WRM 40
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	7.1 Mitigations c) iii. effects of water withdrawal for the hydrogen and ammonia production facility on known contaminated sites;
Reviewer’s Comment:	There is only mention of one existing contaminated sites (landfill near mine pond) in the section referenced. Other areas of contamination have been identified in the area during EA 1975

Project Nujio’qonik : Amendment to the Environmental Impact Statement

Comment ID:	WRM 40
Response:	<p>The Phase I / II Environmental Site Assessments conducted for the Indian Head Hatchery in 2018 (Northern Harvest Smelt Ltd. 2018) identified several areas of potential and actual contamination in groundwater, primarily in areas of the old Abitibi mill, but also including a landfill to the west / northwest of Gull (Mine) Pond. An assessment of the industrial water supply (Appendix WRM36-A) shows elevated levels of total dissolved solids and a number of metal parameters in groundwater in the vicinity of the landfill. However, the assessment also indicates that Noels Pond, Muddy Pond, and Gull (Mine) Pond are perched ponds, which are hydraulically isolated from groundwater that may be flowing from these contaminated sources. Numerical modelling completed as part of the assessment indicates that potential changes in water levels in the ponds caused by water withdrawal for the hydrogen ammonia production facility will have no significant impact on the groundwater system and will therefore not interact with known contaminated sites.</p> <p>Reference:</p> <p>Northern Harvest Smelt Ltd. 2018. Indian Head Hatchery Expansion Project Registration Document, Appendix F, Part1-1. Available online: https://www.gov.nl.ca/ecc/files/env-assessment-projects-y2018-1975-1975-appendix-f-part1-part1.pdf</p>
Supporting Documentation:	Appendix WRM36-A: Fracflow EIS-Input on Groundwater Impacts

Response to WRM 41

Comment ID:	WRM 41
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	<p>7.2.8 Environmental Effects Monitoring Programs (EEMPs), 7.2.8.2</p> <p>Groundwater and Surface Water Monitoring Program A groundwater and surface water monitoring plan must be described that ensures the long- term security of the groundwater resources, and must include a groundwater monitoring program that will require the drilling of an appropriate number of monitoring and production wells.</p>
Reviewer’s Comment:	EIS states “Groundwater and Surface Water Monitoring Program, Avifauna Impacts Mitigation and Monitoring Plan, and the Outfitter Environmental Effects Monitoring Plan are being submitted post-EIS submission.” Not submitted with EIS
Response:	<p>WEGH2 is committed to developing site-specific mitigation and monitoring plans, including the Groundwater (GWMP) and Surface Water Monitoring Plans (SWMP), Avifauna Impacts Mitigation and Monitoring Plan (AIMMP) and the Outfitter Environmental Effects Monitoring Plan (OEEMP) prior to Project construction at that site. The plans will incorporate mitigation measures and monitoring commitments in the Environmental Impact Statement (EIS) and this EIS Amendment, will reflect applicable conditions of release from the environmental assessment process, and will include information on how and when updates to the plans will be made. The plans will be developed in consultation with applicable regulators and will be submitted for review prior to Project construction at that site.</p>

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Comment ID:	WRM 41
	WEGH2 is committed to an adaptive management approach, and as such, these plans are considered “living” documents that will be updated as applicable to capture Project design updates and results of ongoing environmental monitoring. Draft Tables of Contents (TOC) for the Species at Risk Impacts Mitigation and Monitoring Plan, GWMP, SWMP, AIMMP, and OEEMP are provided in Appendices 2-F to 2-J of this EIS Amendment.
Supporting Documentation:	Appendix 2-F Species at Risk Impacts Mitigation and Monitoring Plan Draft TOC Appendix 2-G Groundwater Monitoring Plan Draft TOC Appendix 2-H Surface Water Monitoring Plan Draft TOC Appendix 2-I Avifauna Impacts Mitigation and Monitoring Plan Draft TOC Appendix 2-J Outfitter Effects Monitoring Plan Draft TOC

Response to WRM 42

Comment ID:	WRM 42
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	6.4 Cumulative Environmental Effects
Reviewer’s Comment:	Cumulative effects on the water resources from the industrial water supply for the hydrolysis plant and other industrial water users have not been assessed
Response:	Data from 2017-2022 demonstrates water usage by industrial and residential water users is much lower than anticipated (refer to Appendix WRM42-A).
Supporting Documentation:	Appendix WRM42-A: Water Usage for Industrial and Residential Users – Gull (Mine) Pond

Response to WRM 43

Comment ID:	WRM 43
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	6.4 Cumulative Environmental Effects
Reviewer’s Comment:	Cumulative effects of rising the water level of Noels and Muddy Pond and flooding in the area of Noels Pond have not been assessed

Project Nujio’qonik : Amendment to the Environmental Impact Statement

Comment ID:	WRM 43
Response:	<p>WEGH2 intends to manage rising water levels in Noel’s and Muddy Pond by allowing the water level to rise about 0.60 to 0.70 m above the current normal pond level and to remove the fill in the outflow channel allowing the pond to be lowered about 0.45 to 0.5 m below its current normal level. WEGH2 has committed to automatically lowering the pond level when a major precipitation or snow melt event starts as a mitigation measure. The flood plain maps from the Newfoundland and Labrador Department of Environment and Climate Change confirm that there is an area in the community of Noels Pond that floods during large runoff events, i.e., snow melt or large precipitation events. WEGH2’s actions will moderate that impact by allowing the pond level to be lowered below its current level and by opening the flow control gates to lower the pond level as the precipitation events develops. These mitigation measures are intended to reduce overall cumulative effects of flooding in the area of Noel’s Pond.</p> <p>Please refer to Section 2.1.1.1 in Appendix WRM13-A for additional details.</p>
Supporting Documentation:	<p>Appendix WRM13-A, 2023 Fracflow Industrial Water Demand and Supply Assessment</p> <p>Appendix WRM18-A Noel's Pond Water Levels Report</p>

Response to WRM 44

Comment ID:	WRM 44
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	2.1 Study Area: precise description of wind turbines, transmission lines, substations, access roads, and laydown areas.
Reviewer’s Comment:	Access roads are not clearly identified in the EIS in either of the wind farm areas.
Response:	<p>Figure 2.3 of the Environmental Impact Statement (EIS) shows the Codroy Wind Farm layout (including access roads). The layout for the Port au Port Wind Farm has been updated to remove turbines and the updated layouts (including access roads) can be seen in Figure 2.1 and Figure 2.2 of this EIS Amendment. The road layout will remain within the Project Area previously assessed, and therefore no changes to the effects predictions for access roads are required. The government-approved Environmental Protection Plan will outline how potential effects will be mitigated during construction, and the government-approved Surface Water Monitoring Plan will be in place prior to construction to detect and report on unmitigated potential effects.</p>
Supporting Documentation:	<p>Figure 2.1 Revised Turbine Layout to Avoid Expanded Rouzes Brook Protected Public Water Supply Area</p> <p>Figure 2.2 Revised Turbine Layout of Pine Tree / Table Mountain due to Proximity to Stephenville Airport</p>

Response to WRM 45

Comment ID:	WRM 45
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	2.3.3 m) procedures for regular ambient climate, water quantity and quality monitoring
Reviewer’s Comment:	No indication of specifics on where or how ambient climate and water will be monitored throughout the project. Indicated a monitoring program will be developed. No indication of the required real-time water quality/quantity monitoring throughout the project. Port au Port peninsula frequently has a different microclimate than Stephenville/Codroy and a climate station is recommended here.
Response:	Surface Water and Groundwater Monitoring Plans will be developed in consultation with the Water Resources Management Division, including the installation of a real-time water quality monitoring network throughout the Project Area, as well as a microclimate station. Draft Tables of Contents (TOCs) for both plans are appended to this EIS Amendment (Appendix 2-G and 2-H).
Supporting Documentation:	Appendix 2-G Groundwater Monitoring Plan Draft TOC Appendix 2-H Surface Water Monitoring Plan Draft TOC

Response to WRM 46

Comment ID:	WRM 46
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	4.3.2 Groundwater and surface water monitoring plan to ensure the long- term security of the water resources.
Reviewer’s Comment:	The long-term monitoring plan is vague and does not address the requirements for real-time water quality/quantity monitoring. Hydrometric stations are referenced in Chapter 9.8 but does not describe the methodology details. No hydrometric stations are indicated for Codroy area.
Response:	Chapter 9.8 of the Environmental Impact Statement (EIS) indicates follow-up monitoring objectives that will verify the accuracy of predictions made in the EIS. The Surface Water Monitoring Plan (SWMP) SWMP (in preparation) will include these monitoring objectives and may include more after further consultation with applicable regulators. WEGH2 is committed to developing site-specific mitigation and monitoring plans, including the Groundwater Monitoring Plan (GWMP) and SWMP prior to Project construction at that site. The SWMP will include the methodology for collecting water quantity and quality data. WEGH2 is committed to an adaptive management approach, and as such, these plans are considered

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Comment ID:	WRM 46
	<p>“living” documents that will be updated as applicable to capture Project design updates and results of ongoing environmental monitoring. Draft Tables of Contents for the GWMP and SWMP are provided in Appendix 2-G and 2-H, respectively.</p> <p>Watersheds selected for hydrometric monitoring were based on those with the highest density of Project infrastructure, which are all in the Port au Port and Stephenville Project areas. WEGH2 will consult with the Water Resource Management Division on the desired real-time hydrometric monitoring locations.</p>
Supporting Documentation:	<p>Appendix 2-G Groundwater Monitoring Plan Draft TOC</p> <p>Appendix 2-H Surface Water Monitoring Plan Draft TOC</p>

Response to WRM 47

Comment ID:	WRM 47
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	6.2 Predicting Environmental Effects of the Undertaking
Reviewer’s Comment:	Effects on water quality are defined qualitatively but not quantitatively. Does not address the requirements for real-time water quality/quantity monitoring as a proactive water monitoring measure.
Response:	Residual effects on water quality in the Port au Port and Codroy wind farms will be managed with the application of the Water Resources Management Division’s guidance document, Environmental Guidelines for General Construction Practices, and so no quantitative modelling was produced for changes in water quality. However, real-time water quality monitoring will be a part of the Surface Water Monitoring Plan and will assist in verifying the accuracy of these predictions. Pre-Project background data in the Aquatic Environment Baseline Study (Appendix BSA-2 of the EIS) helps characterize water quality in the Project Area and will provide baseline data to compare data from the real-time monitoring stations.
Supporting Documentation:	None

Response to WRM 48

Comment ID:	WRM 48
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	6.3 Accidents and Malfunctions
Reviewer's Comment:	No plan provided if the industrial supply is not available.
Response:	Please refer to Section 3.2.4 Alternative Sources of Industrial Water Supply in the Environmental Impact Statement (EIS). We also note that the industrial water demand in the EIS was based on maximum requirements for cooling water near the end of life for the electrolyzers.
Supporting Documentation:	None

Response to WRM 49

Comment ID:	WRM 49
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	7.2.1 Emergency Response/Contingency Plan, g) failure of industrial water supply
Reviewer's Comment:	No plan provided if the industrial supply is not available.
Response:	Please refer to Section 3.2.4 Alternative Sources of Industrial Water Supply in the Environmental Impact Statement (EIS). We also note that the industrial water demand in the EIS was based on maximum requirements for cooling water near the end of life for the electrolyzers.
Supporting Documentation:	None

Response to WRM 50

Comment ID:	WRM 50
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	7.2 Plans
Reviewer’s Comment:	EIS indicates a series of environmental management plans will be developed to mitigate effects of the project post-EIS submission. Emergency Response Plan in Appendix 2-F is minimal.
Response:	As per the Environmental Impact Statement (EIS) Guidelines, WEGH2 will prepare and submit Environmental Effects Monitoring Plans prior to the initiation of Project construction activities. WEGH2 will work with the Department of Justice and Public Safety and local emergency services in the refinement of the Emergency Response Plan.
Supporting Documentation:	None

Response to WRM 51

Comment ID:	WRM 51
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	2.3.1 – General Layout b) the hydrogen and ammonia production facility, including but not limited to a description of the following: i) buildings, structures, and infrastructure required for water electrolysis and hydrogen and ammonia production.
Reviewer’s Comment:	The source of water required for electrolysis has been identified and described. Pg 2.78 Figure 2.45 is missing a flow chart link between primary treatment and RO treatment. The EIS references the industrial water use of this source by Abitibi as 8.5 million m ³ /yr (970 m ³ /h). This is less than the average of 1688 m ³ /hr (max of 2403 m ³ /h) of raw industrial water use to be pumped from Gull Pond to feed the plant. The EIS did not provide any evaluation of the available yield of the industrial water supply as per the WRMD Industrial Water Supply and Wastewater Design Guidelines (https://www.gov.nl.ca/ecc/files/Guidelines- for-Industrial-WWW.pdf). A proper water balance was not provided. The Fracflow 2023 Industrial Water Supply Report was not provided as part of the EIS.
Response:	An evaluation of the available yield of the industrial water supply is provided in Appendix WRM13-A.

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Comment ID:	WRM 51
Supporting Documentation:	Appendix WRM13-A 2023 Fracflow Industrial Water Demand and Supply Assessment

Response to WRM 52

Comment ID:	WRM 52
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	2.3.1 – General Layout “provide a written and graphic description of... the hydrogen and ammonia production facility”
Reviewer’s Comment:	The location of the hydrogen and ammonia plant shown in figure 2.4 includes land that is under 4 m in elevation and that will be vulnerable to sea level rise, storm surge and waves. There is no consideration for this in the EIS.
Response:	WEGH2 believes the port is well-protected from storm surge and waves by the natural geography of the port. The narrow entrance channel to the port would dissipate wave energy and minimize risk to the plant site. The port did not experience a storm surge during Hurricane Fiona, for example (Mayor T. Rose, Pers. Comm. 2024). The lowest point on the plant site is 4.75m above sea level (ASL) and the plant true elevation will go up from there, between 6 to 7.5 m ASL at the lower section and 11 m ASL at the upper section. See Figure WRM 52.1 below.
Supporting Documentation:	Figure WRM52.1 Port Elevation Above Sea Level

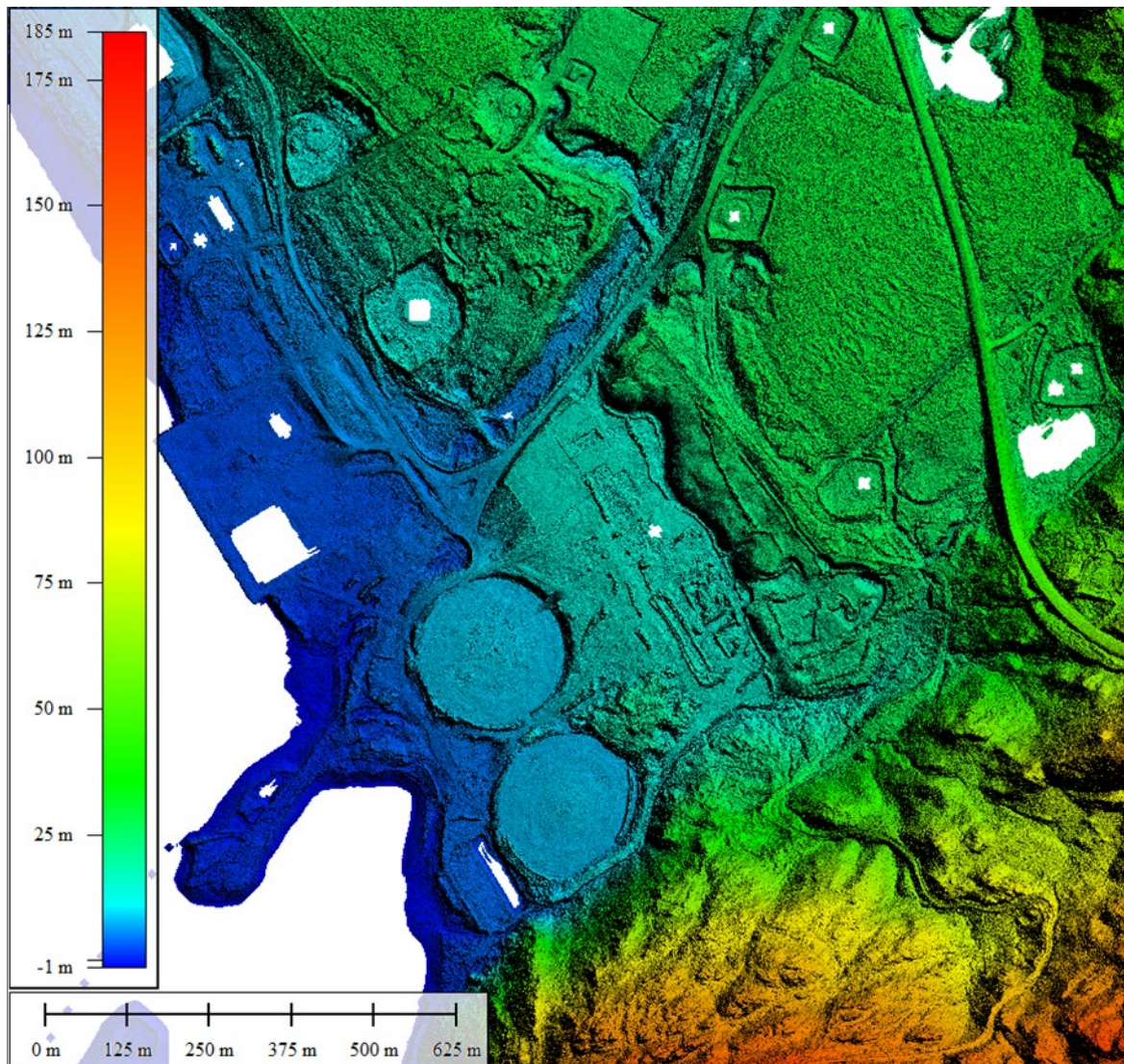


Figure WRM52.1 Port Elevation Above Sea Level

Response to WRM 53

Comment ID:	WRM 53
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	2.3.1 – General Layout
Reviewer’s Comment:	The location of the Codroy Wind Farm (figure 2.3) and the hydrogen and ammonia plant (figure 2.4) are in watersheds with existing designated floodplain mapping. The increased level of development will have an impact on these floodplain areas. There is no consideration for this in the EIS.
Response:	<p>The Newfoundland and Labrador Department of Environment and Climate Change’s Flood Risk Mapping database does not indicate the hydrogen and ammonia plant site as being in a floodplain.</p> <p>The stream valleys / depressions on both the west side and on the east side are relatively narrow and confined. WEGH2 analyzed the drainage basin for the stream on the west side and assessed peak flows and determined flows can be managed. Please see the attached Appendix WRM 53-A Codroy Flooding Risk Assessment. The only other risk for site flooding was the large gravity feed water pipeline that connects Gull (Mine) Pond to the plant site. This risk was recognized in 2023 and stop logs were designed and placed at the pipeline intake at Gull (Mine) Pond to limit the flow in the pipeline to that which would be required to provide fire-fighting water flows and to remove the risk of uncontrolled flooding of the plant site.</p> <p>Reference:</p> <p>Department of Environment and Climate Change, Water Resources management Division. Flood Risk Mapping applications. Available online: https://www.arcgis.com/apps/webappviewer/index.html?id=24dd4bb6f03948eb93f0535367a42a1f&extent=-6567263.7527%2C6174564.7354%2C-6449856.4772%2C6225701.1073%2C102100</p>
Supporting Documentation:	Appendix WRM53-A: Codroy Flooding Risk Assessment

Response to WRM 54

Comment ID:	WRM 54
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	2.3.1 – General Layout “water supply source(s)”

Project Nujio’qonik : Amendment to the Environmental Impact Statement

Comment ID:	WRM 54
Reviewer’s Comment:	Figures 2.49-2.51 show a potential increase of 2 m in the water levels of the 3 ponds that will make up part of the water supply for the hydrogen and ammonia plant. Noel’s Pond and Muddy pond are part of the designated floodplain for the Town of Stephenville. The EIS contains no detail on the potential impacts raising the water level in Noel’s Pond may have on flooding in Stephenville.
Response:	There is no intention to increase water levels by 2 m. WEGH2 intends to manage rising water levels in Noel’s and Muddy Pond by allowing the water level to rise about 0.60 to 0.70 m above the current normal pond level and to remove the fill in the outflow channel allowing the pond to be lowered about 0.45 to 0.5 m below its current normal level. WEGH2 has committed to automatically lowering the pond level when a major precipitation or snow melt event starts as a mitigation measure. The flood plain maps from the Department of Environment and Climate Change confirm that there is an area in the community of Noels Pond that floods during large runoff events, i.e., snow melt or large precipitation events. WEGH2’s actions will moderate that impact by allowing the pond level to be lowered below its current level and by opening the flow control gates to lower the pond level as the precipitation events develops. Please see section Water Resources and Industrial Water Infrastructure in the attached appendix.
Supporting Documentation:	Appendix WRM13-A: 2023 Fracflow Industrial Water Demand and Supply Assessment

Response to WRM 55

Comment ID:	WRM 55
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	2.3.1 – General Layout a) each wind energy generation site required to make the Project operational and viable (i.e. Sites B and C referenced in the Proponent’s environmental assessment registration document if applicable and other sites if required) including but not limited to a description of the following: iii access roads, water course crossings and laydown areas;
Reviewer’s Comment:	<ul style="list-style-type: none"> • Stream crossing structures have been proposed to design for 1:10 year return period. • Proponent is advised to design the stream crossing for 1:100 year climate change condition as some of the stream crossings on the access road are located within the vicinity of localities for purpose of avoiding any drainage or flooding issues in the communities/project area. • Wind Power Line RoW crosses flood plain mapping of the Town of Stephenville. Any work on the RoW located within flood plain will require section 48 permit

Project Nujio’qonik : Amendment to the Environmental Impact Statement

Comment ID:	WRM 55
	<ul style="list-style-type: none"> • Access roads cross wetlands and streams at several locations which will require Section 48 permit. EIS mentioned that stream and wetland crossing will be determined and designed at the construction phase. • It needs to clarify whether the repurposing (design/construction) of existing access road will follow industry standard similar to new access road suitable to carry the heavy equipment and turbines. It also needs to clarify in EPP how the impact of road construction and on- site drainage on watercourse/waterbody will be minimized. • A section 48 permit will be required for the dredging of Port of Stephenville.
Response:	<p>For permanent access roads, which will be majority of what is constructed, WEGH2 will design for a one in 25 year (1/25 yr) event, while for high risk areas, the merit of a higher return period will be evaluated on a case-by-case basis using available data and considering downstream infrastructure. For temporary roads required for construction (e.g., access a quarry, or temporary laydown area), these would be constructed to the 1/10 yr event.</p> <p>Roads (upgrades or new) will be constructed to the same standard. Through geotechnical investigation, including test-pitting, WEGH2 will determine the extent to which existing road foundations can be left in place and built upon. The Environmental Protection Plan will elaborate on the commitments and mitigation measures described in Tables 2.10 and 9.7 respectively of the Environmental Impact Statement (EIS).</p> <p>WEGH2 acknowledges the requirements for Section 48 permits.</p>
Supporting Documentation:	None

Response to WRM 56

Comment ID:	WRM 56
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	2.3.2 – Construction “Project components for in- water works, such as fording, removal of aquatic and/or stream side vegetation, infilling, dewatering, water use activities, and changes to natural flow regime;”
Reviewer’s Comment:	The project areas encompass large tracts of land that will see a high density of development and fragmentation due to proposed wind turbines, access roads and power lines. Linear development will transect multiple streams identified on 1:50 CANVEC topographic mapping for which S48 permits are required under the WRA. The EIS lacks detail on how the proponent will deal with smaller streams and ephemeral / intermittent streams in the project areas. Best Management Practices to protect watercourses and wetlands from siltation and disturbance are mentioned, but no details are provided. From past experience in this area, such streams can contribute to significant amounts of erosion and sedimentation of waterbodies as they transect access roads during rainfall/runoff events.

Project Nujio’qonik : Amendment to the Environmental Impact Statement

Comment ID:	WRM 56
Response:	Details on best management practices to protect watercourses and wetlands will be developed in consultation with the Water Resources Management Division, the Newfoundland and Labrador Department of Fisheries, Forestry and Agriculture and Fisheries and Oceans Canada. These departments will be consulted as applicable in the development of the Groundwater and Surface Water Monitoring Plans and the Environmental Protection Plan.
Supporting Documentation:	None

Response to WRM 57

Comment ID:	WRM 57
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	2.3.2 – Construction b) site preparation, clearing, blasting, etc., for the installation of (i) wind turbines, laydown areas, transmission lines (including subterranean transmission lines), substations, and access roads (including water crossings) for all wind energy generation sites;
Reviewer’s Comment:	<ul style="list-style-type: none"> • It needs to clarify in EPP how the impact of road construction on watercourse/waterbody will be minimized. • Some of the wind turbine gravity structures foundation may be placed within 15 metres of waterbody. This massive excavation and foundation work have potential to impact/pollute waterbodies. The EPP document needs to clarify the preventive and mitigation measures for near water works and the storage and disposal of excavated materials.
Response:	The Project layout has been designed to avoid interaction with water bodies wherever possible. Detailed best management practices to protect watercourses and wetlands will be developed in consultation with the Water Resources Management Division, the Newfoundland and Labrador Department of Fisheries, Forestry and Agriculture and Fisheries and Oceans Canada. These departments will be consulted as applicable in the development of the Groundwater and Surface Water Monitoring Plans and the Environmental Protection Plan.
Supporting Documentation:	None

Response to WRM 58

Comment ID:	WRM 58
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	<p>2.3.3 – Operations and Maintenance</p> <p>i) proposed water source(s), estimated daily and annual volume of water quantity and water quality requirements, and any treatment needed to meet the required water quality for hydrogen and ammonia production.</p> <p>j) other water withdrawal requirements and sources during project operation, including water for cooling.</p> <p>k) characterization of wastewater effluent from hydrogen and ammonia production, estimation of annual volume of effluent discharge, description of treatment required for effluent to meet regulatory standards for discharge, and a description of the receiving environment for wastewater discharged during hydrogen and ammonia production.</p>
Reviewer’s Comment:	<p>i) There are inconsistencies throughout the EIS regarding water use (e.g., section 2.6.3 pg.2-87 says 1680 m³/hr, while the same page says 9 m³/m or 540 m³/hr). WRMD requires a clear breakdown of the total water use (total raw water, total cooling water, total electrolysis water, total wastewater from primary treatment, total wastewater from RO treatment) per phase of the project.</p> <p>j) Total volume of water required for cooling is not clearly described in the EIS. WRMD has concerns that the possible volume of water used for cooling is being underestimated. WRMD requires a clear breakdown of the total water use (total raw water, total cooling water, total electrolysis water, total wastewater from primary treatment, total wastewater from RO treatment) per phase of the project.</p> <p>k) Wastewater effluent is adequately predicted in EIS. Wastewater treatment options are still being evaluated. Total wastewater volume not clear. Pg. 2.87 states the existing effluent pipeline capacity is 2.7 m³/min, which is 30% of the 9.0 m³/min of raw industrial water supply needed for electrolysis and cooling. Pg. 2.87 also states that 28 m³/min is required (30% of 28 m³/min is 8.4 m³/min, which is far greater than the existing capacity). Pg. 2.77 states that 36% of the water supplied is eventually lost, not 30%. The total water volume required for each process and subsequent total wastewater for each process needs to be clearly defined.</p>

Project Nujio'qonik : Amendment to the Environmental Impact Statement

Comment ID:	WRM 58																																																																																				
Response:	<p>i) The 9m³/m was an error.</p> <table border="1"> <thead> <tr> <th>Water usage</th> <th>Phase 1</th> <th>Phase 2</th> <th>Phase 3</th> <th>Net Required Total</th> <th colspan="2">Design (w/ 10% Margin)</th> </tr> <tr> <td></td> <td>m³/h</td> <td>m³/h</td> <td>m³/h</td> <td>m³/h</td> <td>m³/h</td> <td>GPM</td> </tr> </thead> <tbody> <tr> <td colspan="7">End of Run (EOR) case</td> </tr> <tr> <td>Cooling Water (CW) Make-up</td> <td>702</td> <td>523</td> <td>523</td> <td>1,748</td> <td>1,923</td> <td>8,466</td> </tr> <tr> <td>Water Treatment for PEM, HP Steam generation, Potable water</td> <td>172</td> <td>171</td> <td>171</td> <td>514</td> <td>565</td> <td>2,489</td> </tr> <tr> <td>Reject Water from Pretreatment of water</td> <td>46</td> <td>37</td> <td>37</td> <td>119</td> <td>131</td> <td>577</td> </tr> <tr> <td>EOR - Total</td> <td>920</td> <td>731</td> <td>731</td> <td>2,381</td> <td>2,619</td> <td>11,533</td> </tr> <tr> <td colspan="7">Start of Run (SOR) case</td> </tr> <tr> <td>CW Make-up</td> <td>480</td> <td>410</td> <td>410</td> <td>1,300</td> <td>1,430</td> <td>6,296</td> </tr> <tr> <td>Water Treatment for PEM, HP Steam generation, Potable water</td> <td>172</td> <td>171</td> <td>171</td> <td>514</td> <td>565</td> <td>2,489</td> </tr> <tr> <td>Reject Water from Pretreatment of water</td> <td>34</td> <td>31</td> <td>31</td> <td>96</td> <td>105</td> <td>463</td> </tr> <tr> <td>SOR - Total</td> <td>686</td> <td>612</td> <td>612</td> <td>1,910</td> <td>2,100</td> <td>9,248</td> </tr> </tbody> </table> <p>j) Please see Appendix WRM13-A for more information on water use.</p> <p>k) A characterization of wastewater effluent from hydrogen and ammonia production is included as Appendix PPD9-A.</p>	Water usage	Phase 1	Phase 2	Phase 3	Net Required Total	Design (w/ 10% Margin)			m ³ /h	m ³ /h	m ³ /h	m ³ /h	m ³ /h	GPM	End of Run (EOR) case							Cooling Water (CW) Make-up	702	523	523	1,748	1,923	8,466	Water Treatment for PEM, HP Steam generation, Potable water	172	171	171	514	565	2,489	Reject Water from Pretreatment of water	46	37	37	119	131	577	EOR - Total	920	731	731	2,381	2,619	11,533	Start of Run (SOR) case							CW Make-up	480	410	410	1,300	1,430	6,296	Water Treatment for PEM, HP Steam generation, Potable water	172	171	171	514	565	2,489	Reject Water from Pretreatment of water	34	31	31	96	105	463	SOR - Total	686	612	612	1,910	2,100	9,248
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Supporting Documentation:	Appendix WRM13-A 2023 FracFlow Industrial Water Demand and Supply Assessment Appendix PPD9-A Preliminary Wastewater Effluent Composition																																																																																				

Response to WRM 59

Comment ID:	WRM59
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	2.3.3 – Operations and Maintenance

Project Nujio’qonik : Amendment to the Environmental Impact Statement

Comment ID:	WRM59
Reviewer’s Comment:	Section 2.6.6 of the EIS states there will be no restrictions to public access within the wind farms except fencing around the substations. Given the network of access roads and power line routes that will open this area up for access and use by the general public, there is no consideration of the secondary consequences of such access on waterbodies, wetlands and stream crossing infrastructure. Is there any consideration for how this will be managed (e.g., number of secondary users of access roads, impacts by secondary users, increased maintenance on stream crossing infrastructure required due to secondary users)?
Response:	While access will not be restricted during periods of safe operations, WEGH2 will be monitoring access and use of the wind farm areas through various security and surveillance methods. WEGH2 is committed to responsible stewardship of the land it has been granted access to, and will work with local stakeholders through the Community Liaison Committee and Indigenous partnerships to monitor use and help protect the land.
Supporting Documentation:	None

Response to WRM 60

Comment ID:	WRM 60
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	2.3.4 – Decommissioning and Rehabilitation f) Decommissioning of industrial water supply.
Reviewer’s Comment:	f) Proponent is assuming pond water level control systems will remain in place. Ownership of the control structures should be defined to determine who would be responsible after decommissioning.
Response:	Water level control structures will remain with the Town of Stephenville after decommissioning. WEGH2 and the Town are in discussions regarding the terms of such an arrangement.
Supporting Documentation:	None

Response to WRM 61

Comment ID:	WRM 61
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	3.2 Alternative Methods of Carrying Out the Undertaking d) Water sources for the hydrogen and ammonia production facility
Reviewer’s Comment:	d) Alternate sources for the industrial water supply were considered. The preferred water supply of the Proponent is satisfactory.
Response:	Thank you. No response required.
Supporting Documentation:	None

Response to WRM 62

Comment ID:	WRM 62
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	4.2.2 – Aquatic Environment b) industrial water supply availability and use c) surface and groundwater resources and locations, including identification of those resources planned to supply the hydrogen and ammonia production facility. e) Hydrologic and hydrogeological assessment of the proposed water supply for the hydrogen and ammonia production facility, and all testing results for water quantity and quality, including metals.
Reviewer’s Comment:	b) Project interactions and potential impact on quantity of surface water resources identified. Outflow structures at both Gull (Mine) Pond and Noels Pond to allow for a minimum 30% MAF for environmental low flow is acceptable. c) Water supply identified. e) HEC Hydrologic Modelling System analysis of the Warm Creek drainage basin should be provided to WRMD upon completion. This should have been done up front to support available yield analysis for the industrial water supply.
Response:	Please see Appendix WRM13-A for HEC Hydrologic Modelling System analysis of the Warm Creek drainage basin.
Supporting Documentation:	Appendix WRM13-A: 2023 Fracflow Industrial Water Demand and Supply Assessment

Response to WRM 63

Comment ID:	WRM 63
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	4.2.2 – Aquatic Environment
Reviewer’s Comment:	Best Management Practices to protect watercourses and wetlands from siltation and disturbance are mentioned, but no details are provided. Fragmentation of wetlands should be avoided. An annotated table of contents of the Environmental Protection Plan (Appendix 2-E) is provided, but this includes no details and there are no specified environmental protection procedures for wetlands.
Response:	Best Management Practices to protect wetlands will be developed in consultation with applicable regulatory authorities and presented in detail in the Environmental Protection Plan.
Supporting Documentation:	None

Response to WRM 64

Comment ID:	WRM 64
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	4.3.2 – Aquatic Environment Baseline Study
Reviewer’s Comment:	Baseline study was provided and includes sufficient information relating to water quantity. HEC Hydrologic Modelling System analysis of the Warm Creek drainage basin should be provided to WRMD upon completion.
Response:	This modelling will be provided to the Water Resources Management Division when available. Please see Appendix WRM13-A for HEC Hydrologic Modelling System analysis of the Warm Creek drainage basin.
Supporting Documentation:	Appendix WRM13-A 2023 Fracflow Industrial Water Demand and Supply Assessment

Response to WRM 65

Comment ID:	WRM 65
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	6.2 – Predicted Environmental Effects of the Undertaking c) Effects of the Project on surface water bodies, wetlands, and groundwater aquifers
Reviewer’s Comment:	c) Project interactions and potential impact on surface water resources identified. Outflow structures at both Gull (Mine) Pond and Noels Pond to allow for a minimum 30% mean annual flow for environmental low flow is acceptable.
Response:	Thank you. No response required.
Supporting Documentation:	None

Response to WRM 66

Comment ID:	WRM 66
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	6.3 – Accidents and Malfunctions e) Failure of industrial water supply
Reviewer’s Comment:	e) Failure of the industrial water supply should address issues relating to drought and climate change (i.e. Will plant shut down if there is not enough flow to maintain environmental flow downstream during drought condition?)
Response:	Appendix WRM13-A shows historical drought conditions using conservative approach. While WEGH2 does not expect drought conditions to require the shutdown of the plant operations, an alternate water supply is presented in Section 3.2.4 of the Environmental Impact Statement (EIS).
Supporting Documentation:	Appendix WRM13-A: 2023 Fracflow Industrial Water Demand and Supply Assessment

Response to WRM 67

Comment ID:	WRM67
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	6.4 – Cumulative Effects
Reviewer’s Comment:	Cumulative effect of surface water withdrawal impacting groundwater user in area not discussed (Northern Harvest Hatchery).
Response:	The only groundwater user in this area is Mowi Canada East (MOWI) and the 3D model and monitoring well data show there will no impacts on MOWI's groundwater supply. The recharge area is up towards Long Gull Pond. The main flood plain area is within the community of Noel’s Pond. Refer also to response for WRM 42.
Supporting Documentation:	Appendix WRM42-A Water Usage for Industrial and Residential Users, Gull (Mine) Pond

Response to WRM 68

Comment ID:	WRM 68
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	7.1 – Mitigations c) The EIS shall describe measures that will be undertaken to mitigate the effects of project operations on water quantity and quality of surface water bodies, groundwater aquifers and wetlands in and adjacent to the project area
Reviewer’s Comment:	c) Mitigation measures include maintaining ecological maintenance flows by monitoring water level in mine pond. Water level should also be monitored in Noels Pond.
Response:	Mitigation measures will be developed in consultation with regulatory authorities and presented in detail in the Environmental Protection Plan. Refer also to response provided for WRM 13. .
Supporting Documentation:	Appendix WRM13-A 2023 Fracflow Industrial Water Demand and Supply Assessment

Project Nujio’qonik : Amendment to the Environmental Impact Statement

Response to WRM 69

Comment ID:	WRM69
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	7.1 – Mitigations The EIS states: “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.”
Reviewer’s Comment:	The buffer widths are not stated and the use of the term “where feasible” makes them sound optional.
Response:	The Project layout has been designed to maintain buffers around known sensitive habitats, species and historic resources. The possibility remains that additional sensitive habitats or species may be discovered during construction. If identified, WEGH2 will consider the options for the mitigation of effects, including avoidance. WEGH2 will consult regulatory authorities on how best to mitigate effects if they cannot be completely avoided by micro-siting the infrastructure.
Supporting Documentation:	None

Response to WRM 70

Comment ID:	WRM70
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	7.2.1 – Emergency Response/Contingency Plan g) Failure of industrial water supply.
Reviewer’s Comment:	g) Failure of the industrial water supply should address issues relating to drought and climate change (i.e. Will plant shut down if there is not enough flow to maintain environmental flow downstream during drought condition?)
Response:	While WEGH2 does not expect drought conditions to require the shutdown of the plant operations, an alternate water supply is presented in Section 3.2.4 of the Environmental Impact Statement (EIS). Refer also to Appendix WRM-13 for information on historical drought conditions.
Supporting Documentation:	Appendix WRM13-A: 2023 Fracflow Industrial Water Demand and Supply Assessment

Response to WRM 71

Comment ID:	WRM71
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	7.2.2 – Waste Management Plans
Reviewer's Comment:	Solid waste stream from water treatment/RO treatment not included in Waste Management Plan. Once facility process streams are finalized, WRMD should be provided with details regarding how the RO membranes will be cleaned and the plans for that waste stream.
Response:	<p>Solid waste (sludge) material from the water treatment / reverse osmosis treatment has undergone preliminary characterization as per the attached (Appendix WRM71-A).</p> <p>The primary option for disposal would be in the in the former settling ponds (see attached Figure WRM 71.1). Each settling pond is about 75 m wide and 160 m long and assuming the same depth as the Aeration Stabilization Basins (ASB), which have been measured at 7 m deep, giving each one a volume of about 70,000 cubic metres or a combined volume of 140,000 cubic metres. By contrast each ASB has a volume of approximately 220,000 cubic metres. Existing monitoring wells, leachate sampling and groundwater seep and surface water sampling locations can be used for contaminant monitoring. WEGH2 is planning to complete Environmental Site Assessments on those basins. The existing 2007 soil and water chemistry data do not show any soil or surface water or groundwater impacts above commercial criteria.</p> <p>A secondary option for sludge disposal would be through a licenced organics waste handling and treatment facility at Raymond Ryans Pit, Benoits Siding, Doyles, NL. (Approval No WMS-22-06-001)</p> <p>Once facility process streams are finalized and an accurate characterization of the solids is available, the Water Resources Management Division and Pollution Prevention Division will be provided with details regarding how the RO membranes will be cleaned and the plans for that waste stream will be developed for the Environmental Protection Plan, and the Waste Mangement Plan updated in consultation with applicable authorities.</p>
Supporting Documentation:	Figure WRM71.1 Location of Settling Ponds and Aeration Stabilization Basins Appendix WRM71-A Sludge Characterization

Project Nujio'gonik : Amendment to the Environmental Impact Statement

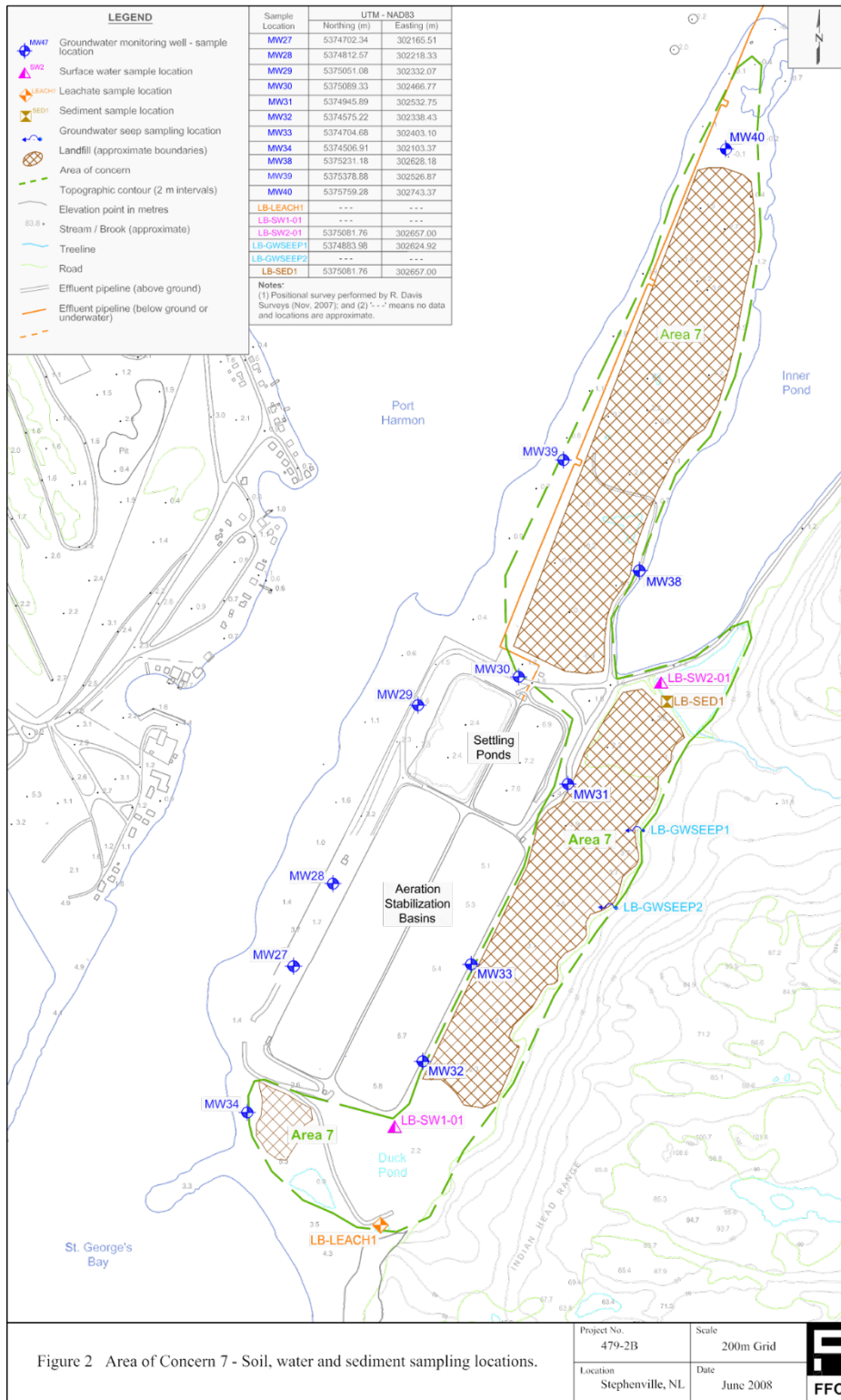


Figure WRM71.1 Location of Settling Ponds and Aeration Stabilization Basins

Response to WRM 72

Comment ID:	WRM 72
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	7.2.8 – Environmental Effects Monitoring Programs (EEMPs)
Reviewer’s Comment:	To be submitted prior to construction.
Response:	WEGH2 is committed to developing site-specific mitigation and monitoring plans, including the Groundwater (GWMP) and Surface Water Monitoring Plans (SWMP), Avifauna Impacts Mitigation and Monitoring Plan (AIMMP) and the Outfitter Environmental Effects Monitoring Plan (OEEMP) prior to Project construction at that site. The plans will incorporate mitigation measures and monitoring commitments in the Environmental Impact Statement (EIS) and this EIS Amendment, will reflect applicable conditions of release from the environmental assessment process, and will include information on how and when updates to the plans will be made. The plans will be developed in consultation with applicable regulators and will be submitted for review prior to Project construction at that site. WEGH2 is committed to an adaptive management approach, and as such, these plans are considered “living” documents that will be updated as applicable to capture Project design updates and results of ongoing environmental monitoring. Draft Tables of Contents (TOC) for the Species at Risk Impacts Mitigation and Monitoring Plan, GWMP, SWMP, AIMMP, and OEEMP are provided in Appendices 2-F to 2-J.
Supporting Documentation:	Appendix 2-F Species at Risk Impacts Mitigation and Monitoring Plan Draft TOC Appendix 2-G Groundwater Monitoring Plan Draft TOC Appendix 2-H Surface Water Monitoring Plan Draft TOC Appendix 2-I Avifauna Impacts Mitigation and Monitoring Plan Draft TOC Appendix 2-J Outfitter Effects Monitoring Plan Draft TOC

Response to WRM 73

Comment ID:	WRM 73
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	8.0 – Residual Effects and Determination of Significance
Reviewer’s Comment:	Residual effects on surface water quantity provided and characterized. Water level and flow monitoring within the industrial water supply ponds will occur.
Response:	Water levels and flow monitoring in the industrial water supply ponds will be included in the Surface Water Monitoring Plan. A draft Table of Contents (TOC) for the Surface Water Monitoring Plan is provided in Appendix 2-H.
Supporting Documentation:	Appendix 2-H Surface Water Monitoring Plan Draft TOC Appendix WRM36-A 2023 Fracflow EIS Input on Groundwater Impacts

Response to WRM 74

Comment ID:	WRM 74
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	11.0 – Environmental Protection Plan
Reviewer’s Comment:	EPP should include water withdrawal monitoring as well as water level monitoring in industrial water supply.
Response:	Water levels and flow monitoring in the industrial water supply ponds will be included in the Surface Water Monitoring Plan. A draft Table of Contents (TOC) for the Surface Water Monitoring Plan is provided in Appendix 2-H.
Supporting Documentation:	Appendix 2-H Surface Water Monitoring Plan Draft TOC

Response to WRM 75

Comment ID:	WRM 75
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	11.0 – Environmental Protection Plan
Reviewer’s Comment:	<ul style="list-style-type: none"> • It needs to clarify in EPP how the impact of road construction and on-site drainage on watercourse/waterbody will be minimized. • Some of the wind turbine gravity structures foundation may be placed within 15 metres of waterbody. This massive excavation and foundation work have a potential to impact/pollute waterbodies. The EPP document needs to clarify the mitigation measures for near water works and the storage and disposal of excavated materials. • A detail disposal plan needs to be provided in EPP for the safe disposal of dredged materials from the Port of Stephenville • The EPP should identify chemicals in use at the wind turbine sites and their volumes and how to deal with potential spills or release of these chemicals into waterbodies.
Response:	Agreed. The Environmental Protection Plan will address each of those items.
Supporting Documentation:	None

Response to WRM 76

Comment ID:	WRM 76
Department:	NL Environment and Climate Change
Branch/ Division:	Water Resources Management Division
EIS Guidelines Reference (Where provided):	Back-up Water Supply
Reviewer’s Comment:	EIS does not discuss backup options in the event the industrial water supply levels are too low to support production of hydrogen and ammonia and provide environmental flows.
Response:	The Environmental Impact Statement (EIS) demonstrates how available water storage exceeds effects from historical drought cycles. While WEGH2 does not expect drought conditions to require the shutdown of the plant operations, an alternate water supply is presented in Section 3.2.4 of the EIS. Please see Appendix WRM13-A for further detail.
Supporting Documentation:	Appendix WRM13-A: 2023 Fracflow Industrial Water Demand and Supply Assessment

4.3 Climate Change Branch

Response to CCB1

Comment ID:	CCB1
Department:	NL Environment and Climate Change
Branch/ Division:	Climate Change Branch
EIS Guidelines Reference (Where provided):	2.3.2 Construction (n) 2.3.3 Operation and Maintenance (w) 2.3.4 Decommissioning and Rehabilitation (d) 6.2 Predicted Environmental Effects of the Undertaking (h)
Reviewer's Comment:	The proponent was asked to provide estimates of fuel/energy consumption in addition to providing GHG emissions associated with fuel combustion and GHG emissions from any non-combusted and industrial process sources at the facility, by source per year for construction, operation, and decommissioning phases of the project. Annual GHG estimates provided do not meet emissions thresholds; therefore, the project will not be regulated by the MGGA.
Response:	Noted. Thank you.
Supporting Documentation:	None

Response to CCB2

Comment ID:	CCB2
Department:	NL Environment and Climate Change
Branch/ Division:	Climate Change Branch
EIS Guidelines Reference (Where provided):	6.2 Predicted Environmental Effects of the Undertaking (h)
Reviewer's Comment:	Annual GHG estimates provided do not meet emissions thresholds; therefore, the project will not be regulated by the MGGA. This is contingent upon a proposed plan to obtain energy from NL Hydro. We request that the EIS include a statement noting that CCB review is based on the assumptions made by the proponent for energy supply as described and/or anticipated. If alternate energy options are needed that are fossil fuel dependent, then the project may meet thresholds to be regulated under the MGGA and would be subject to BACT under the MGGA.

Project Nujio'qonik : Amendment to the Environmental Impact Statement

Comment ID:	CCB2
Response:	WEGH2 acknowledge that the emissions profiles were based on the energy supply presented in the Environmental Impact Statement (EIS) and that addition of energy from fossil fuels may subject the Project to Best Available Control Technologies under the provincial Management of Greenhouse Gas Regulations.
Supporting Documentation:	None

4.4 Natural Areas Program, Policy, Planning, and Natural Areas Division

Response to NAP 1

Comment ID:	NAP 1
Department:	NL Environment and Climate Change
Branch/ Division:	Natural Areas Program, Policy, Planning, and Natural Areas Division
EIS Guidelines Reference (Where provided):	2.0 The Proposed Undertaking: 2.1c(i) , (ii), and (ii). study Areas (description of environmental significance and geographical setting of existing and proposed protected areas; description of habitats of listed species at risk, including critical habitat for designated species and other sensitive areas)
Reviewer's Comment:	<p>Proponent provided adequate description and maps of environmental significance and geographical setting of existing and proposed protected areas, and habitats of species at risk and other sensitive areas (such as the proposed Cape St George protected area).</p> <p>Figure 2.28 notes the presence of a provisional ecological reserve. Policy, Planning, and Natural Areas Division advises that the area is a proposed protected area only, and not provisional (provisional ecological reserve has a legal definition under the Wilderness and Ecological Reserves Act).</p> <p>Page 12.12</p> <p>PPNAD advises that Cape St. George is a proposed transitional reserve only.</p> <p>Table 12.11 (Control ID #159) and Page 12.59</p> <p>The proponent notes proposed ecological reserves will be avoided “to the extent possible” during the construction phase. PPNAD advises that the division must be consulted prior to construction of a new 230 kV transmission line through Bras Mort Bog proposed protected area to ensure limited disturbance to the ecological integrity of the area.</p> <p>Page 16.4</p> <p>PPNAD advises that NL Department of Environment and Climate Change is responsible for the WER Act and associated regulations (and not NLDFFA as noted by the proponent).</p> <p>Pages 16.15 and 16.29, Tables 16.9, 16.11, 16.12</p> <p>PPNAD advises that all proposed ecological reserves must go through a legislated public engagement and assessment phase. The final decision on whether to protect areas under the WER Act rests with the Lieutenant Governor in Council; no decisions have been made to date on whether to establish proposed protected areas.</p>
Response:	WEGH2 agrees with these statements and will consult with Natural Areas Program, Policy, Planning, and Natural Areas Division prior to the start of construction of a transmission line through Bras Mort Bog proposed protected area.
Supporting Documentation:	None

Response to NAP 2

Comment ID:	NAP 2
Department:	NL Environment and Climate Change
Branch/ Division:	Natural Areas Program, Policy, Planning, and Natural Areas Division
EIS Guidelines Reference (Where provided):	4.0 Environment; 4.2 Existing Environment: 4.2.3c. Description of the existing biophysical and socio-economic environment that will be affected or might reasonably be expected to be affected, directly or indirectly, by the undertaking with emphasis on the valued environmental components (VECs). The EIS shall describe the relevant components of wetlands and the terrestrial environment including species of conservation concern and their habitats (e.g. environmentally-sensitive areas, such as provincial parks and reserves; ecologically and biologically significant areas; protected areas).
Reviewer's Comment:	<p>Proponent provided adequate description and maps of the existing biophysical environment that will be affected or might reasonably be expected to be affected by the undertaking with emphasis on relevant components of wetlands and the terrestrial environment including existing and proposed protected areas and habitats for species of conservation concern.</p> <p>Table 15.20</p> <p>The proponent has proposed a new 230 kV transmission line through Bras Mort Bog proposed protected area. Policy, Planning, and Natural Areas Division advises that the proponent must consult with ECC regarding transmission line construction in this location before any work occurs to ensure limited disturbance to the ecological integrity of the area.</p>
Response:	Thank you. WEGH2 will consult with Natural Areas Program, Policy, Planning, and Natural Areas Division prior to the start of construction of a transmission line through Bras Mort Bog proposed protected area.
Supporting Documentation:	None

Response to NAP 3

Comment ID:	NAP 3
Department:	NL Environment and Climate Change
Branch/ Division:	Natural Areas Program, Policy, Planning, and Natural Areas Division
EIS Guidelines Reference (Where provided):	4.0 Environment; 4.3 Baseline Studies: 4.3.3b. The baseline study shall identify, at a minimum, environmentally sensitive areas such as provincial parks and reserves; ecologically and biologically significant areas; protected areas. The baseline study shall demonstrate the interaction of the Project boundaries with the environmentally sensitive areas.
Reviewer’s Comment:	Proponent provided adequate identification of environmentally sensitive areas and demonstrated interaction of the Project boundaries with these areas including existing and proposed protected areas, both in main body of EIS and Appendix Baseline Study 3 (BSA-3).
Response:	Thank you for confirmation that requirements were addressed in the EIS. No further response required.
Supporting Documentation:	None

Response to NAP 4

Comment ID:	NAP 4
Department:	NL Environment and Climate Change
Branch/ Division:	Natural Areas Program, Policy, Planning, and Natural Areas Division
EIS Guidelines Reference (Where provided):	6.0 Environmental Effects: 6.2e The EIS shall contain a comprehensive analysis of the predicted environmental effects of the Project on flora and fauna (including Species at Risk and Species of Conservation Concern), and their habitat (including critical, sensitive, and rare habitat [such as limestone barrens]).
Reviewer’s Comment:	Proponent provided adequate information on direct and indirect effects on Project construction, operation, decommissioning, and rehabilitation on existing and proposed protected areas
Response:	Thank you for confirmation that requirements were addressed in the EIS. No further response required.
Supporting Documentation:	NA

Response to NAP 5

Comment ID:	NAP 5
Department:	NL Environment and Climate Change
Branch/ Division:	Natural Areas Program, Policy, Planning, and Natural Areas Division
EIS Guidelines Reference (Where provided):	6.0 Environmental Effects: 6.4 Cumulative effects. The EIS shall identify and assess the Project’s cumulative environmental effects
Reviewer’s Comment:	Proponent provided adequate assessment of cumulative effects on existing and proposed protected areas.
Response:	Thank you for confirmation that requirements were addressed in the EIS. No further response required.
Supporting Documentation:	NA

Response to NAP 6

Comment ID:	NAP 6
Department:	NL Environment and Climate Change
Branch/ Division:	Natural Areas Program, Policy, Planning, and Natural Areas Division
EIS Guidelines Reference (Where provided):	7.0 Environmental Protection – Mitigation and Plan. 7.1e Effects of the Project on flora and fauna (including species at risk and species of conservation concern), and their habitat (including critical, sensitive, and rare habitat [such as limestone barrens]).
Reviewer’s Comment:	<p>Proponent provided adequate description of proposed mitigations related to effects on species at risk and their habitats including the proposed Cape St George and Bras Mort Bog protected areas. For the most part, the proponent has committed to avoidance of these areas.</p> <p>Table 13.8</p> <p>The proponent has proposed a new 230 kV transmission line through Bras Mort Bog proposed protected area.</p> <p>Policy, Planning, and Natural Areas Division advises that the proponent must consult with ECC regarding transmission line construction in this location before any work occurs to ensure limited disturbance to the ecological integrity of the area.</p>
Response:	Thank you. WEGH2 will consult with Natural Areas Program, Policy, Planning, and Natural Areas Division prior to the start of construction of a transmission line through Bras Mort Bog proposed protected area.
Supporting Documentation:	None

Response to NAP 7

Comment ID:	NAP 7
Department:	NL Environment and Climate Change
Branch/ Division:	Natural Areas Program, Policy, Planning, and Natural Areas Division
EIS Guidelines Reference (Where provided):	8.0 Residual environmental effects. The EIS shall list and contain a detailed discussion and evaluation of residual effects of components described in Section 6.2
Reviewer’s Comment:	Pages 20.54, 20.56, 20.97, 20.102 The proponent has committed to consulting with Policy, Planning, and Natural Areas Division regarding Environmental Effects Mitigation and Monitoring Plan regarding Cape St George proposed transitional reserve, Bras Mort Bog proposed ecological reserve, and Cape John proposed ecological reserve.
Response:	WEGH2 will consult with Natural Areas Program, Policy, Planning, and Natural Areas Division during development of environmental effects mitigation and monitoring plans.
Supporting Documentation:	None

5.0 NL Department of Fisheries, Forestry and Agriculture

The Newfoundland and Labrador Department of Fisheries, Forestry and Agriculture (NLDDFA) has provided comments based on the review of the Project Environmental Impact Statement (EIS). The detailed comments and World Energy GH₂'s (WEGH₂'s) responses are provided in Section 5.1.

5.1 Detailed Comments

Response to FFA 1

Comment ID:	FFA 1
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	7.2.7 Domestic Wood cutting Consultation Plan The EIS shall include a Domestic Wood Cutting Consultation Plan with domestic users on the Port au Port Peninsula to identify and address and concerns with the Project and develop appropriate mitigations, in consultation with the Department of Fisheries, Forestry and Agriculture.
Reviewer’s Comment:	<ol style="list-style-type: none"> 1. While some work has been undertaken to develop a domestic wood plan, it appears not to be finalized at this time. FFA recommends continuance of this plan to facilitate domestic opportunities for local residents 2. To help offset the loss of productive forested landbase due to permanent infrastructure, FFA request that the proponent contact the local district forestry office to determine potential areas for afforestation.
Response:	<ol style="list-style-type: none"> 1. Noted, thank you. As part of the implementation of Domestic Woodcutting Consultation Plan, we will work with communities to facilitate access to the wood by local residents. 2. To offset the loss of productive forested land after installation, excess cleared area will be rehabilitated by reforestation/afforestation activity with the preparation of the area for suitable growing conditions and planting appropriate tree species.
Supporting Documentation	None

Response to FFA 2

Comment ID:	FFA 2
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	2.1 Study Areas GPS locations and proximity of Project components to existing environmental features, including but not limited to: ix. Commercial fishing areas, navigation routes and aquaculture sites.
Reviewer's Comment:	Location of current aquaculture operations were identified within the Study area. The salmon hatchery in Stephenville and three marine shellfish sites in the Piccadilly Bay area. (Note: The three marine sites in Piccadilly area are no longer licensed for aquaculture activity)
Response:	Thank you. No response required.
Supporting Documentation	None

Response to FFA 3

Comment ID:	FFA 3
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	4.2. 2 Aquatic Environment The EIS shall describe the relevant components of the aquatic environment within the study area of the, including, but not limited to, the following: f) commercial, recreational, and Indigenous fisheries, including marine aquaculture operations.
Reviewer's Comment:	NOTE: Aquaculture operations were not identified in Chapter 10 – Section 10.2.2 as indicated but were identified in Chapter 11 on pages 11.1 and 11.11.
Response:	Thank you. No response required.
Supporting Documentation	None

Response to FFA 4

Comment ID:	FFA 4
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	4.2.4 Land and Resource Use The EIS shall describe relevant land and resource use within the study area of thes, including, but not limited to, the following: c) existing land-based aquaculture facilities (including hatcheries)
Reviewer’s Comment:	Chapter 11 – There are limited aquaculture sites in the project area. The three marine based sites in Piccadilly Bay were identified and a salmon hatchery in the Stephenville area (Note: the three marine shellfish sites no longer exist). The salmon hatchery was identified as being near the proposed hydrogen/ammonia plant. None of the aquaculture sites overlap with the proposed project activities. Water use at the salmon hatchery is identified and noted the company operating the facility has nonexclusive rights to withdraw water from nearby fresh water and saltwater wells.
Response:	Thank you. No response required.
Supporting Documentation	None

Response to FFA 5

Comment ID:	FFA 5
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	4.2.7 Economy, Employment and Business The EIS shall describe relevant economy, employment and business elements in the study area of thes, including the following: Value of existing industries, including tourism, cultural and recreational; mining, mineral and quarrying; commercial, recreational, and Indigenous fisheries, including marine aquaculture operations; and other major employers.
Reviewer’s Comment:	Page 2.5 offers general figures for fisheries and aquaculture. Existing conditions pertaining to land and marine based aquaculture facilities; public and industrial supplies are described separately in the Aquatic Baseline Study.
Response:	Thank you. No response required.
Supporting Documentation	None

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Response to FFA 6

Comment ID:	FFA 6
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	4.3.1 Atmospheric Environment The baseline study of the atmospheric environment shall be focused on, at minimum, the following components c) Vibration c) Vibration from the operation of wind turbines may have an effect on the receiving environment, including human and animal receptors. The baseline study shall assess and report on ambient vibrations at each of the wind energy generation sites, and shall provide the distance of the nearest wind turbines to, at a minimum, the following features: ix. Commercial fishing areas, navigation routes and aquaculture sites.
Reviewer’s Comment:	Section 3.0 adequately describes study and baseline for vibrations.
Response:	Thank you. No response required.
Supporting Documentation	None

Response to FFA 7

Comment ID:	FFA 7
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	4.3.2 Aquatic Environment The baseline study of the aquatic environment shall be focused on, at minimum, the following components: c) Fish, Fish Habitat, and Fisheries Furthermore, the Fish and Fish Habitat Baseline Study shall: viii. identify existing marine- based aquaculture facilities and operations and describe the scale of operations
Reviewer’s Comment:	Section 6.3.5 provides a description of aquaculture activity in the study area and an overview of the scale of operations. Tables 6.12 describes the types of operation and species licensed under each facility. Table 6.13 shows the proximity of the project with each aquaculture site.
Response:	Thank you. No response required.
Supporting Documentation	None

Response to FFA 8

Comment ID:	FFA 8
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	<p>4.3.4 Land and Resource Use</p> <p>The baseline study of land and resource use shall focus on, at minimum, the following components: b) Industrial Land Use</p> <p>b) The proposed areas for wind energy generation overlap/lie in close proximity to existing industrial land use. This baseline study shall describe, at a minimum, the following industrial land use within or adjacent to the Project study areas, and the interaction of the Project with those industrial uses: iii. Aquaculture</p>
Reviewer’s Comment:	<p>Section 6.3.2.4 identifies aquatic invasive species that have been identified within the LAA and are presented in Table 6.5. Distribution of AIS within the LAA are based off reports by DFO through a series of surveys between 2006-2010. Four other AIS have been identified along Newfoundland coastlines in other parts of the province through similar AIS surveys: golden star tunicate, oyster thief, vase tunicate and violet tunicate. These four AIS were noted, as they are known to be disruptive to marine-based aquaculture operations.</p> <p>Section 6.3.5 provides a description of aquaculture activity in the study area and an overview of the scale of operations. The section highlights the land-based hatchery owned by Northern Harvest Smolt, size of operation and its proximity to the proposed hydrogen /ammonia plant.</p> <p>Section 6.3.5.2 addresses water use at the hatchery and outline details on the Water Use License and maximum estimated annual water withdrawal.</p> <p>Section 2.3.1 of BSA-4 identifies aquaculture in the region and its value in the province.</p> <p>Section 3.3.9 of BSA-4 identifies the aquaculture sector a user of the Port of Stephenville.</p> <p>Section 4.1 Aquaculture Land Use Existing conditions pertaining to land- and marine-based aquaculture facilities; public and industrial water supplies are described separately in the Aquatic Baseline Study</p>
Response:	Thank you. No response required.
Supporting Documentation	None

Response to FFA 9

Comment ID:	FFA 9
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	6.2 Predicted Environmental Effects of the Undertaking Effects of the Project on surface water bodies, wetlands and groundwater aquifers, including but not limited to the following: vii. effects on existing and potential commercial, recreational, and Indigenous fisheries and aquaculture operations.
Reviewer’s Comment:	Chapter 11 – Section 11.1 states “Aquaculture activity is limited in marine waters near the Project. Three marine- based farms exist approximately 5 km beyond the project area within Piccadilly Bay along the coast of Port au Port Peninsula for shellfish species (scallop and mussels). One land-based smolt hatchery exists near the proposed hydrogen / ammonia plant in Stephenville.” (Note: Marine sites are no longer licensed). Section 11.2.2.1 Highlights two aquatic invasive species identified by DFO that are currently inside the LAA and four other aquatic invasive species that are in the coastal Newfoundland waters. It states vessels entering Newfoundland ports are subject to biosecurity protocols to prevent the spreading of AIS in the province. Section 11.2.2.4 shows aquaculture activity within the LAA is limited; three marine shellfish sites located in Piccadilly Bay and the Indian Head Salmon Hatchery owned by Northern Harvest Smolt Ltd. based in Stephenville. The hatchery is located on the same road as the proposed hydrogen / ammonia plant. It currently has a non- exclusive right to withdraw water from nearby freshwater wells and saltwater wells. Chapter 21 – page 21.18 identifies the potential impact of the accidental introduction of aquatic invasive species could have on marine shellfish aquaculture operations. Chapter 21.5.1.1 Construction - page 21.25 - WEGH2 indicates they will maintain ongoing engagement with affected marine users. Document states residual effects will be reduced by avoiding active fishing areas. Where avoidance is not feasible, mitigation and consultation with Indigenous fisheries and aquaculture operators are anticipated to reduce potential conflicts and/or temporary disruptions in access to resources and/or harvesting areas.
Response:	Thank you. No response required
Supporting Documentation	None

Response to FFA 10

Comment ID:	FFA 10
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	6.2 Predicted Environmental Effects of the Undertaking Effects of the Project on land use and tenure, including but not limited to: viii. potential effects of vibrations from wind turbines on existing land and marine-based aquaculture facilities and operations.
Reviewer’s Comment:	<p>Page 19.30 – Vibrations</p> <p>Project-related vibration, shadow flicker, lighting, and changes to viewscape are expected to have negligible residual effects on change in quality of life during construction. For Project related noise, it was determined that with the implementation of mitigation measures, adverse residual effects on quality of life will be low in magnitude (predicted change in %HA was less than the Health Canada criterion of 6.5% HA), extend to the LAA/RAA, be short- term in duration, and regular in frequency</p> <p>Page 19.32 Operations and Maintenance... As described in Chapter 7 (Acoustic Environment), it is expected that Project-related vibration produced during operation and maintenance will not be perceptible outside of the Project Area and will therefore have negligible residual effects on quality of life.</p> <p>All current aquaculture operations in the project area fall outside the LAA for the wind turbines.</p>
Response:	Noted. Thank you.
Supporting Documentation	None

Response to FFA 11

Comment ID:	FFA11
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	7.1 Mitigations c) The EIS shall describe measures that will be undertaken to mitigate the effects of Project operations on water quantity and quality of surface water bodies, groundwater aquifers and wetlands in and adjacent to the Project area, including but not limited to the following: vii. effects on existing and potential commercial, recreational, and Indigenous fisheries and aquaculture operations.
Reviewer’s Comment:	Section 8.4 Mitigation Measures Table 8.4 Outlines the key measures to mitigate the potential effects of the Project on groundwater resources. Section 9.4 Mitigation Measures Table 9.7 Outlines Key measures to mitigate the potential effects of the Project on surface water. Section10.4 Mitigation Measures Table 10.5 Outlines the key measures to mitigate the potential effects of the Project on Freshwater Fish and Fish Habitat Section 11.4 Mitigation Measures Table 11.5 Outlines the key measures to mitigate the potential effects of the Project on the Marine Environment and use. Section 20.4 Mitigation Measures Table 20.4 Outlines the Key measures to mitigate the potential effects of the Project on land and resource use.
Response:	Thank you. No response required.
Supporting Documentation	None

Response to FFA 12

Comment ID:	FFA 12
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	<p>Avifauna/ Species at Risk</p> <p>4.2.3 Terrestrial Environment</p> <p>4.2 Baseline Studies</p> <p>a) Use terrestrial environment to describe species and habitat in the area for all seasons including breeding and migration – based on preliminary data from existing sources.</p> <p>b) Baseline studies to support the evaluation of environmental effects and/or to develop mitigation measures and follow up monitoring programs.</p> <p>c) Monitoring program to start during construction year and continue year-round for minimum of 2 years</p> <p>d) Nightjar/Common Nighthawk/Short-eared Owl surveys required</p>
Reviewer’s Comment:	<ul style="list-style-type: none"> • Only winter coastal waterbird surveys have been conducted so far (Mar 07, 08, 13 & 14) • Habitat analysis was derived via a desktop exercise • Confidence level in avifauna presence/ absence and staging hot spots during migration is low to moderate because information on bird observations and locations can only be from places that have been visited and reported on, which is not an accurate representation of a region (e.g. populated areas around Stephenville versus remote inaccessible areas such as Anguille Mountains or central Port au Port). • It is difficult to predict with confidence based on arbitrarily reported incidental sightings without having a set or targeted monitoring program conducted by proponent • The area is part of the Atlantic Flyway (a major migratory route), therefore: <ul style="list-style-type: none"> a) Migratory surveys must be completed to enable any assessment of potential significant avifauna mortality along the flyway as wind turbines (and transmission lines) have been shown to have significant impacts (e.g. mortality) on some avifauna species if this information is not incorporated into the planning b) The location of the major flight paths (and their features such as staging sites) in relation to the proposed wind turbines must be presented prior to planning stage to allow any assessment to take place on avoidance and predicted impacts – As stated in BSA-3 <p>4.3 Results: “There are many concentration points within or near the LAA that are bottlenecks for migrating birds, or places to congregate and stage before or after a long trans-oceanic flight.”</p> <p>Commitment under Chapter 13.8 Follow-Up and Monitoring Section and Table 13.8 ID #250</p>

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Comment ID:	FFA 12
Response:	<p>(a) Based upon both the EIS Guidelines and regulatory consultation and feedback as described in Section 2.2 of this Environmental Impact Statement (EIS) Amendment, desktop baseline data is considered sufficient for the purposes of the environmental assessment. As indicated in the EIS, WEGH2 is committed to and is in the process of conducting the site-specific environmental field programs identified in the EIS Guidelines and further defined through consultation with regulators prior to Project construction. Preliminary results of the 2023 Port au Port bird surveys are provided in the 2023 Interim Bird and Bat Data Report (Appendix 2-B).</p> <p>Given the phased approach to construction, baseline data collection to date has focused on the Port au Port Peninsula, since it will be the first wind farm to be constructed. Baseline field data collection is planned in the Codroy area during 2024, along with continued baseline data collection on the Port au Port Peninsula. Reports detailing data collection methods, results and additional mitigation measures will be provided to regulators prior to Project construction, either as a standalone submission or as part of developing the required mitigation and monitoring plans (e.g., Avifauna Impacts Mitigation and Monitoring Plan). WEGH2 will engage Newfoundland and Labrador Department of Fisheries, Forestry and Agriculture (NLDDFA-Wildlife Division) and ECCC (Environment and Climate Change Canada) in the development of the required Species at Risk Impacts Mitigation and Monitoring Plans.</p> <p>Surveys completed in 2023 included:</p> <ul style="list-style-type: none"> • Aerial Surveys for wintering waterbirds • Aerial Survey for Harlequin Duck and Purple Sandpiper • Land based Coastal Waterbird Survey • Wintering/Resident Landbird Survey • Spring and Fall Shorebird Survey • Spring and Fall Migration/Flight Path Survey • Fall Waterfowl Surveys • Nocturnal Owl Breeding Survey • Short-eared Owl Breeding Survey • Breeding Marshbird Monitoring Survey • Breeding Gull/Tern Survey • Inland Breeding Waterfowl Survey • Bank Swallow Breeding Survey • Seabird Colony Survey • Breeding Bird Survey Point Counts • Deployment of Autonomous Recording Units (ARUs)
Supporting Documentation	Appendix 2-B 2023 Bird and Bat Interim Technical Data Report

Response to FFA 13

Comment ID:	FFA 13
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	6.2 Predicted Environmental Effects of the Undertaking e) on fauna 7.1 measures to mitigate the adverse environmental effects on e) fauna 7.2 Plans (Avifauna & SAR IMMP)
Reviewer’s Comment:	Analysis on habitat and habitat loss completed. Discussion on impacts on resident species and populations is still outstanding for entire Project site SAR IMMP and Avifauna Management plan – still outstanding; therefore the EIS cannot address the full suite of environmental effects and associated mitigation measures on fauna; Proponent is required via the SAR IMMP process to provide robust info on each species through field surveys in order to produce and evaluate effectiveness of mitigations and monitoring plans under the SAR IMMP
Response:	WEGH2 is committed to developing site-specific mitigation and monitoring plans, including the Species at Risk Impacts, Mitigation and Monitoring Plan (IMMP) and Avifauna IMMP prior to Project construction at that site. The plans will incorporate mitigation measures and monitoring commitments in the Environmental Impact Statement (EIS) and this EIS Amendment, will reflect applicable conditions of release from the environmental assessment process, and will include information on how and when updates to the plans will be made. The plans will be developed in consultation with applicable regulators and will be submitted for review prior to Project construction at that site. WEGH2 is committed to an adaptive management approach, and as such, these plans are considered “living” documents that will be updated as applicable to capture Project design updates and results of ongoing environmental monitoring. Draft table of contents for these plans are appended to this EIS Amendment as Appendix 2-F and 2-I.
Supporting Documentation	Appendix 2-F Species at Risk Impacts Mitigation and Monitoring Plan TOC Appendix 2-I Avifauna Impacts Mitigation and Monitoring Plan TOC

Response to FFA 14

Comment ID:	FFA 14
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	<p>Bats</p> <p>Terrestrial Environment</p> <p>4.3.3 a) vi.:</p> <p>Pre-construction bat survey during full active season (April 15 to Oct 31)</p> <p>Summarized data and raw call files must be included in the EIS</p> <p>4.3.3 e):</p> <p>The EIS shall describe measures that will be undertaken to mitigate the effects of all phases of the Project on bats</p> <p>6.2 Predicted Environmental Effects of the Undertaking e) on fauna</p> <p>7.1 measures to mitigate the adverse environmental effects on e) fauna</p> <p>7.2 SAR IMMP</p>
Reviewer’s Comment:	<p>The requested monitoring season of April 15 to Oct 31 is yet to be covered – note – to date only autumn migration season has been covered;</p> <p>To be completed under the SAR IMMP process where proponent will be required to provide full coverage of requested monitoring season as well as ARU raw call files in order to produce and evaluate effectiveness of mitigations and monitoring plans under the SAR IMMP</p> <p>* Note – Appendix B – Bats Appendix provided for information on suggested and/or required revisions and additions to the EIS document as well as information to help with preparation of documents under the SAR IMMP</p>
Response:	<p>As indicated in the EIS, WEGH2 is committed to and is in the process of conducting the site-specific environmental field programs identified in the EIS Guidelines and further defined through consultation with regulators prior to Project construction. The results of the Port au Port surveys are provided in the 2023 Bird and Bat Interim Technical Data Report (Appendix 2-B).</p> <p>Given the phased approach to construction, baseline data collection to date has focused on the Port au Port Peninsula, since it will be the first wind farm to be constructed. Baseline field data collection is planned in the Codroy area during 2024, along with continued baseline data collection on the Port au Port Peninsula. Reports detailing data collection methods, results and additional mitigation measures will be provided to regulators prior to Project construction, either as a standalone submission or as part of developing the required mitigation and monitoring plans (e.g., Species at Risk Impacts Mitigation and Monitoring Plan). WEGH2 will engage Newfoundland and Labrador Department of Fisheries, Forestry and Agriculture (NLDDFA-Wildlife Division) in the development of the required Species at Risk Impacts Mitigation and Monitoring Plans. A draft table of contents for the SARIMMP is appended to this EIS Amendment as Appendix 2-F.</p>
Supporting Documentation	<p>Appendix 2-B 2023 Bird and Bat Interim Technical Data Report</p> <p>Appendix 2-F Species at Risk Impacts Mitigation and Monitoring Plan TOC</p>

Response to FFA 15

Comment ID:	FFA 15
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	Plants Terrestrial Environment 4.3.3 a) vii. : Comprehensive pre-construction survey for plants and lichens including digital GPS plant and lichen locations and survey tracks A complete list of rare plants/lichens and plant/lichen species at risk in the Project area is to be provided using current S-ranks.
Reviewer’s Comment:	There is reference to ‘reconnaissance-level’ field surveys in 2023, but the data has not been shared with FFA, and this level of survey would not meet guideline requirements. Unable to assess; Prediction confidence stated in EIS as being ‘low’ for vegetation primarily due to data gaps
Response:	Based upon a thorough review of the EIS Guidelines and regulatory consultations, it was determined that field-collected baseline data were not required for inclusion in the EIS (see EIS Guidelines Section 4.3 -Baseline Studies). As indicated in the EIS, WEGH2 is committed to and is in the process of conducting the site-specific environmental field programs identified in the EIS Guidelines and further defined through consultation with regulators prior to Project construction. The results of the Port au Port vegetation surveys are provided in Land Cover Classification and Rare Plants Technical Data Report – Port au Port Wind Farm (Appendix 2-C). Given the phased approach to construction, baseline data collection to date has focused on the Port au Port Peninsula, since it will be the first wind farm to be constructed. Baseline field data collection is planned in the Codroy area during 2024, along with continued baseline data collection on the Port au Port Peninsula, where required. Reports detailing data collection methods, results and additional mitigation measures will be provided to regulators prior to Project construction, either as a standalone submission or as part of developing the required mitigation and monitoring plans (e.g., Species at Risk Impacts Mitigation and Monitoring Plan). WEGH2 will engage Newfoundland and Labrador Department of Fisheries, Forestry and Agriculture (NLDFFA-Wildlife Division) in the development of the required Species at Risk Impacts Mitigation and Monitoring Plans.
Supporting Documentation	Appendix 2-C, Land Cover Classification and Rare Plants Technical Data Report – Port au Port Wind Farm

Response to FFA 16

Comment ID:	FFA 16
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	<p>4.2.3 Terrestrial Environment a) Describe terrestrial flora (and fauna), including ecological land classifications, and unique geology/geomorphology</p> <p>4.3 Baseline Studies</p> <p>Baseline studies shall provide a description of existing conditions in biophysical and socio- economic environments that could be affected by the Project, both in the immediate vicinity and beyond.</p> <p>4.3.3</p> <p>A complete list of rare plants/lichens and plant/lichen species at risk in the Project area is to be provided using current S- ranks.</p>
Reviewer’s Comment:	<p>4.2.3 Ecological classification (Object Based Image Analysis) incomplete at time of EIS submission. Proponent uses NLDDFA Land Use layer, which provides comparatively coarse ecological divisions.</p> <p>Unable to assess; Prediction confidence stated in EIS as being ‘low’ for vegetation primarily due to data gaps</p> <p>4.3 Information incomplete as surveys have not taken place and OBIA is incomplete at time of submission.</p> <p>The basis for the vegetation section of the EIS depends almost exclusively on data previously submitted to the ACCDC plant records database. Although this database is a valuable starting point for determining which species may be present in the area, there are significant portions of the proposed Project Area that have not previously been surveyed and therefore are missing from this data source. This is especially the case for the additional areas submitted in the EIS (e.g. the proposed Codroy wind farm site).</p> <p>Unable to assess due to insufficient baseline data</p>
Response:	<p>Based upon a thorough review of the EIS Guidelines and regulatory consultations, it was determined that field-collected baseline data were not required for inclusion in the EIS (see EIS Guidelines Section 4.3 -Baseline Studies). As indicated in the EIS, WEGH2 is committed to and is in the process of conducting the site-specific environmental field programs identified in the EIS Guidelines and further defined through consultation with regulators prior to Project construction. The results of the Port au Port surveys are provided in Land Cover Classification and Rare Plants Technical Data Report – Port au Port Wind Farm (Appendix 2-C).</p> <p>Given the phased approach to construction, baseline data collection to date has focused on the Port au Port Peninsula, since it will be the first wind farm to be constructed. Baseline field data collection is planned in the Codroy area during 2024, along with continued baseline data collection on the Port au Port Peninsula. Reports detailing data collection methods, results and additional mitigation measures will be provided to regulators prior to Project construction, either as a standalone submission or as part of developing the required mitigation and monitoring plans (e.g., Species at Risk Impacts Mitigation and Monitoring Plan). WEGH2 will engage Newfoundland and Labrador Department of Fisheries,</p>

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	Forestry and Agriculture (NLDDFA-Wildlife Division) in the development of the required Species at Risk Impacts Mitigation and Monitoring Plans.
Supporting Documentation	Appendix 2-C, Land Cover Classification and Rare Plants Technical Data Report – Port au Port Wind Farm

Response to FFA 17

Comment ID:	FFA 17
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	6.2 Predicted Environmental Effects of the Undertaking e) on flora, and limestone barrens
Reviewer’s Comment:	<p>(a) 6.2 It is not made clear in the document that each point in the database represents a species occurrence that can represent a vastly different number of individuals of a species. This is important because the number of individuals estimated to be impacted (as opposed to a general number of occurrences) is critical information for assessing severity of project effects. Estimates of the number of impacted individuals could be made by conducting comprehensive plant surveys.</p> <p>(b) No information has been presented on the effects/impact from the project on the limestone barrens.</p> <p>(c) EIS states: “Mitigation may include offset measures”(mainly for plants). Port au Port is one of the only places where these plants are found; so a) offsetting is one of the last steps to consider as a mitigation, after avoidance has been discussed.</p>
Response:	<p>(a) The Wetland and Vegetation assessment within the Environmental Impact Statement (EIS) includes multiple references to occurrences (such as in Table 12.6) and does not equate occurrences to number of individuals. The Atlantic Canada Conservation Data Centre (AC CDC) data used in the EIS did not consistently include number of individuals, and thus an analysis of that parameter was not possible. Rare plant surveys, including vascular plants and lichens, were conducted in 2023 following submission of the EIS. The results of these surveys are provided in the Land Cover Classification and Rare Plants Technical Data Report – Port au Port Wind Farm (Appendix 2-C).</p> <p>WEGH2 is committed to completing the analysis and reporting on Project-specific data that was collected in 2023, and continuing with data collection where appropriate as part of mitigation and monitoring planning. Reports detailing data collection methods, results and additional mitigation measures will be provided to regulators prior to Project construction, either as a standalone submission or as part of developing the required mitigation and monitoring plans (Species at Risk Impacts Mitigation and Monitoring Plan). WEGH2 will work with the Newfoundland and Labrador Department of Fisheries, Forestry and Agriculture - Wildlife Division to determine the appropriate format and timing for providing reports.</p>

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	<p>(b) The area of barrens predicted to be affected by the Project is described in Table 12.12 of the EIS. As discussed in the EIS, this was based on available provincial data. Although not explicitly discussed in Table 12.12 of the EIS, the barrens within the Port au Port Local Assessment Area (LAA) refer to limestone barrens. The amount of barrens habitat within the Project Area and LAA as determined through a land cover classification (LCC) analysis for the Port au Port LAA based on Object Based Image Analysis (OBIA) is discussed in the Land Cover Classification and Rare Plants Technical Data Report – Port au Port Wind Farm (Appendix 2-C).</p> <p>(c) Offset measures are discussed as a possible mitigation measure for barrens in Section 12.5.1.1, within a paragraph that begins with a discussion on micro-siting (i.e., avoidance). In Section 12.5.2.1, which discussed residual change in species diversity, micro-siting is discussed, and offset measures are not discussed.</p>
Supporting Documentation	Appendix 2-C, Land Cover Classification and Rare Plants Technical Data Report – Port au Port Wind Farm

Response to FFA 18

Comment ID:	FFA 18
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	<p>6.4. Cumulative Environmental Effects The EIS shall identify and assess the Project’s cumulative environmental effects</p> <p>7.1 Mitigation Measures e) describe measures to mitigate the adverse environmental effects of all phases of the Project flora (and habitat such as limestone barrens)</p> <p>7.2 Plans & SAR IMMP The EIS shall include plans [...] that describe procedures, equipment and responsibilities that are in place to ensure an efficient and effective response to aspects of the Project that could adversely affect the receiving environment, including [...]: Species at Risk Impacts Mitigation and Monitoring Program</p> <p>b) Environmental Effects Monitoring Programs (EEMPs): The purpose of the follow-up and monitoring program is to verify the accuracy of the predictions made in the assessment of the effects as well as the effectiveness of the mitigation measures</p>
Reviewer’s Comment:	<p>(a) In terms of habitat, the potential need for a strategy to restore limestone/gravel barrens has not been considered in the EIS as a potential mitigation.</p> <p>(b) Proponent needs to provide limestone barren habitat baseline analysis for pre- and post- construction phase.</p> <p>(c) 6.4 No information has been provided about the cumulative effects of landscape fragmentation resulting from the project.</p>

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	<p>(d) No information is provided about the cumulative impacts to Lindley’s Aster on top of those caused by recent quarry developments in the vicinity of the Port au Port wind farm</p> <p>The effects of this project on Lindley’s Aster would directly overlap with the type of impacts (direct loss of species and associated habitat, increased potential for hybridization) resulting from the AML Quarry on the Port au Port Peninsula, and is in very close vicinity to the project footprint. This should be clearly described as an example of a cumulative effect on plant SAR.</p> <p>Unable to assess for plant SAR</p> <p>(e) Mitigation #40 – “Proponent to work with WD to manage interactions with SWAs” – needs to define in what capacity...</p> <p>Avoidance of Sensitive Wildlife Areas (SWAs) must be demonstrated and specific impacts and locations be outlined – as part of the EIS process. Also relates to Mitigation #159</p> <p>(f) 7.1 “The Project is expected to result in the loss of plant SAR and SOCC such that those species may no longer be sustainable within the RAA. As such, effects of Project construction on vegetation species diversity are expected to be adverse and high in magnitude.”</p> <p>Table 15.2</p> <p>(g) Mitigation #26 – “Re-seeding” is a whole topic on its own in areas to have potential SAR plants. This mitigation must be discussed in more details within the SAR IMMP</p> <p>(h) Mitigation #45 – “avoidance of SAR when practical” is not an acceptable mitigation; Seed collection or transplants may not be an option as a possible mitigation unless it has been successfully proven (e.g. own or other studies)</p> <p>7.2 Mitigation plans for plant SAR are preliminary and stated to be developed as part of SAR IMMP.</p> <p>No specific mitigations stated for plant SOCC have been presented, and missing for Lindley’s Aster or Low Northern Rockcross</p> <p>Unable to assess until survey data are provided and SAR IMMP is developed.</p> <p>Mitigations may also be required for SOCC.</p> <p>(j) As noted in the EIS, a SAR IMMP has not been provided for plant species and supporting information (survey results)</p> <p>Unable to assess</p> <p>b) Insufficient baseline information is available in the EIS about plant species composition and abundance to develop, or assess, the effectiveness of mitigation measures.</p> <p>Unable to assess</p> <p>* Note – Appendix A – Plants Appendix provided for information on suggested and/or required revisions and additions to the EIS document as well as information to help with preparation of documents under the SAR IMMP</p>

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Response:	<p>(a) Although not discussed explicitly, Section 12.5.1.1 of the Environmental Impact Statement (EIS) describes the possibility of offset measures to further the goals identified in the Limestone Barrens SAR Recovery Plan, which may include restoration. These offset measures, which will be developed as part of the Species at Risk Impacts Mitigation and Monitoring Plan (SAR IMMP), will be discussed with the Newfoundland and Labrador Department of Fisheries, Forestry and Agriculture (NLDDFA) - Wildlife Division.</p> <p>(b) An analysis of pre- and post- construction phase of barrens and other habitats is provided in Table 12.12 of the EIS.</p> <p>(c) It is our understanding that past and current activities that occur in the area contribute to landscape fragmentation. Aspects of landscape fragmentation such as edge effects and the increased spread of exotic and invasive species, as well as New York aster (<i>Symphyotrichum novi-belgii</i>), a native plant with conservation implications related to hybridization with Lindley’s aster (<i>Symphyotrichum ciliolatum</i>) are discussed qualitatively in Sections 12.5.1, 12.5.2, 12.5.3, and 12.5.4 of the EIS.</p> <p>(d) Portions of the limestone and dolomite quarry on the Port au Port Peninsula fall within the Wetlands and Vegetation Local Assessment Area and thus are included in the baseline conditions for the Project.</p> <p>(e) WEGH2 will consult with appropriate regulators, i.e., Natural Areas Program-Policy, Planning and Natural Areas Division, Department of Environment and Climate Change, and NLDDFA- Wildlife Division, during development of environmental effects mitigation and monitoring plans in relation to Project work that could affect Sensitive Wildlife Areas. The SAR IMPP plan will be developed prior to the start of Project construction activities.</p> <p>(f) Field work completed in 2023 identified 350 additional SAR occurrences of Lindley’s aster (<i>Symphyotrichum ciliolatum</i>) within the Project Area. The Project will likely result in the loss of some of the observed Lindley’s aster occurrences and habitat conditions may be altered; however, with the observed number of occurrences, Project micro-siting and other mitigation measures, Project effects are not expected to impede the survival of this species. Additional mitigation measures and rehabilitation strategies for affected SAR are being development and will be discussed with the NLDDFA -Wildlife Division as part of the development of the SAR IMMP. Measures may include application of native reclamation seed mixes, periodic non-native plant control and scientific research support.</p> <p>(g) WEGH2 is committed to applying technically feasible mitigation to avoid or reduce Project effects. WEGH2 will work with NLDDFA -Wildlife Division on suitable mitigation measures, including the use of re-seeding, as part of the development of the SAR IMMP.</p> <p>(h) Specific mitigations for Species at Risk will be described in greater detail within the SAR IMMP and developed in consultation with appropriate regulatory agencies. WEGH2 is not aware of a requirement for mitigations for SOCC, but will discuss this potential requirement with the NLDDFA - Wildlife Division.</p> <p>(i) The SAR IMMP is being developed, with a draft Table of Contents appended to this EIS Amendment as Appendix 2-F. WEGH2 will engage NLDDFA-Wildlife Division in the development of the required SAR IMMP.</p>

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Comment ID:	FFA 18
Supporting Documentation	Appendix 2-C, Land Cover Classification and Rare Plants Technical Data Report – Port au Port Wind Farm Appendix 2-F Species at Risk Impacts Mitigation and Monitoring Plan TOC

Response to FFA 19

Comment ID:	FFA 19
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	Fish & Fish Habitat 4.2.2 Aquatic Environment i) Characterization of fish habitat and fish populations by species and life stage Include description of species of special concern, threatened and endangered j) Assessment of the critical and sensitive habitats for spawning, nursing, rearing, feeding, and migration by fish species; k) Assessment of work windows and sensitive times of the year (e.g. migration, feeding and spawning), critical for fish populations identified in the Project area. 4.3 Baseline studies 6.2 Predicted Environmental Effects of the Undertaking d) FFH 7.1 Mitigations d) measures to mitigate the adverse environmental effects on FFH
Reviewer’s Comment:	i) The desktop review provides some information, particularly for species of concern, trout and eel, and also species likely to occur in affected water courses but insufficient knowledge to assess actual occurrences. No information is provided regarding field surveys, fisheries defendant or independent data. Characterization of fish habitat and fish populations = unaddressed to adequate level (i.e., no ground/field validation for habitat desk top work, validation of satellite imagery – sensitive habitats) j) Assessment of critical / sensitive habitats spawning, nursing = unaddressed to adequate level due to complexities in river systems it is recommended that aerial visuals be supported with some level of field survey. k) Assessment of work windows / sensitive times of year = unaddressed as the effects of river crossings on migration patterns is unknown at present 4.3/ 6.2 d) Baseline Studies section – unaddressed / insufficient information to provide meaningful predictions of project on fish passage impacts (likelihood of protected species within area – more data required) Quantitative species biodiversity have not been used. ‘eDNA’ survey methods were discussed during meetings – no information provided on these. Predictive mitigations cannot be measured without a more comprehensive approach to baseline study - fish occurrence / presence / habitat delineation. Offsetting plan to be provided to WD

Comment ID:	FFA 19
Response:	<p>The intended baseline data collection for 2023 was completed as of late October 2023, including eDNA at the Port aux Port Wind Farm, transmission line, and Stephenville Plant site (refer to Appendix 2-A for the 2023 Fish and Fish Habitat Technical Data Report). The approach to fieldwork was presented, modified and approved by Fisheries and Oceans Canada (DFO) and the provincial Inland Fisheries branch. Habitats assessed include watercourses and waterbodies likely to interact with the Project based on the footprints provided. The results of the baseline survey are being used to support the desktop assessment conducted for the environmental assessment and the data will be incorporated into fisheries related permitting for the Project. Overall, the desktop assessment conducted for the Environmental Impact Statement (EIS) was accurate in predicting watercourse type for waterbodies and watercourses predicted to be fish bearing. WEGH2 is committed to completing the analysis and reporting on Project-specific data that was collected in 2023, and continuing with data collection in 2024 and beyond as part of fisheries related permitting and mitigation and monitoring plans. These site-specific data will be provided to regulators prior to Project construction as an amendment, as part of fisheries related permitting, and/or as part of the required mitigation and monitoring plans.</p> <p>i) The information regarding field surveys is provided in the 2023 Fish and Fish Habitat Field Data Report (Appendix 2-A of this EIS Amendment). The habitat preferences of species in the Project Area are well known. 34 stream crossings were sampled using a backpack electrofisher or minnow traps, with fish identified in 19 of the 34 stream crossings. In-field fish surveys to support the Project found that fish species biodiversity was low (four species captured), and included brook trout, American eel, Atlantic salmon and threespine stickleback. Brook trout occurred at 89% of the sites where fish were captured (17 of 19 sites) and represented 93% of the total catch at all sites. American eel occurred at 16% of the sites where fish were captured (3 of 19 sites). Atlantic salmon occurred at 10% of the sites where fish were captured (2 of 19 sites). Threespine stickleback occurred at 5% of the sites where fish were captured. Additional information by watercourse crossing is provided in the 2023 Fish and Fish Habitat Technical Data Report (Appendix 2-A). The predicted occurrence of fish species in the Project Area is based on the results of the field surveys.</p> <p>It is anticipated that the same fish communities will be present within the Codroy Wind Farm based on the habitats available. Field surveys of the Codroy Wind Farm will be completed in 2024 and the results will be provided to the appropriate regulators during the permitting stage of the Project.</p> <p>A data request was sent to DFO and NLDFFA - Fisheries and Aquaculture branch. No freshwater fisheries dependent data were available for the area beyond what was provided in the EIS. Fisheries independent data were collected during the freshwater habitat surveys using backpack electrofishing and minnow traps. Catch per unit effort ranged from 0 to 8 fish per 100 seconds of electrofishing. No fish were captured using minnow traps. The results of these surveys are detailed in the baseline report (Appendix 2-A of this EIS Amendment).</p> <p>In-field fish habitat characterizations were undertaken at proposed road crossings, collector line crossings and transmission line crossings associated with the Port au Port Wind Farm and in watercourses associated with the Plant site. In-field fish habitat characterizations will be completed for the Codroy Wind Farm as the Project progresses. It is anticipated that the same fish species</p>

<p>Comment ID:</p>	<p>FFA 19</p>
	<p>communities will be present within the Codroy Wind Farm based on the habitats available.</p> <p>j) As described above, in-field fish habitat characterizations were undertaken to assist in identifying critical / sensitive habitats including spawning habitats. Given the abundance of rearing (i.e. nursing) habitat within these river systems it is unlikely they would be considered critical in terms of a limiting factor in productivity. Avoidance or mitigation to reduce effects at critical/sensitive habitat locations will be considered during the siting and during the permitting phase of the Project.</p> <p>k) As indicated in Table 10.5 of the EIS, in-water work will be planned to protect fish as required through any letters of advice, <i>Fisheries Act</i> authorizations or in consultation with DFO. Timing windows for Newfoundland and Labrador are established by DFO to protect eggs, juveniles and spawning adults. In tributaries and headwaters of scheduled salmon rivers in-water work should be avoided to the extent practically feasible from October 1 to May 31 during the spawning, incubating and hatching period. In estuaries and main stems of scheduled salmon rivers sensitive timing for fish migration occurs from May 1 to September 30. If in-water work is required during this time, WEGH2 will not obstruct or interfere with the movement and migration of fish (e.g., stream diversion, reducing the duration of in-stream work), and will adhere to the conditions of applicable fisheries related permits. WEGH2 has committed to designing water crossings to facilitate fish passage. No effects on fish migration are anticipated during construction and operation as a result of watercourse crossings.</p> <p>4.3 / 6.2 d) The response above to Reviewer Comment Item k) provides the rationale for no effects of the Project on fish passage as a result of watercourse crossings. Response to Reviewer Comment Item i) provides information on quantitative species biodiversity in the Project Area. Fish diversity is low with seven species identified.</p> <p>The regional presence of fish was determined at 40 potential watercourse crossings along the transmission line route and at select crossings in the Port au Port Wind Farm and Hydrogen / Ammonia Plant. The results of the eDNA analysis indicated brook trout occurred at 55% of sites sampled, American eel occurred at 23% of sites sampled, stickleback occurred at 23% and Atlantic salmon occurred at 15% of sites sampled. Banded killifish (one location), rainbow smelt (two locations) and brown trout (one location) were also detected. The results of the fish sampling and eDNA analysis were consistent and indicated that brook trout, American eel, Atlantic salmon and stickleback were the most likely fish species to occur in the Regional Assessment Area and Local Assessment Area.</p> <p>The Offsetting Plan can be provided as required by the NLDDFA - Wildlife Division and in consultation with DFO.</p>
<p>Supporting Documentation</p>	<p>Appendix 2-A: 2023 Fish and Fish Habitat Technical Data Report</p>

Response to FFA 20

Comment ID:	FFA 20
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	Moose Terrestrial Environment 4.3.3 a) ix: Pre-construction moose baseline survey required 6.2 Predicted Environmental Effects of Project on e) moose 7.1 Mitigations e) on moose (15.4 Table 15.20)
Reviewer’s Comment:	4.3 Surveys proposed for winter 2024 to gather baseline data on current moose populations/ distribution in relation to the Project footprint. (Lack of snow prohibited this survey in 2023.) Proponent/consultant to contact WD to confirm survey areas as project footprint has changed. 6.2 Most significant effects on moose anticipated due to habitat loss associated with road and windmill footprints and the significant increase in access provided by the road construction. Impacts on moose populations in MMA 043 & MMA 009 are going to be different then for MMA 006, MMA 008 and MMA010 due to the amount of Project Footprint overlap within each MMA.
Response:	WEGH2 is committed to continuing with Project-specific baseline data collection in 2024. A permit (WLR2023-20) to complete moose surveys was issued in 2023; however, due to snow conditions and through consultation with Newfoundland and Labrador Department of Fisheries, Forestry and Agriculture (NLDDFA)-Wildlife Division the surveys were not completed in 2023. The same objective, methods, and surveys areas are being proposed for the 2024 survey. WEGH2 will continue to consult with NLDDFA-Wildlife Division with respect to the survey approach and survey areas. Site-specific reports / data will be provided to regulators prior to Project construction at that site, WEGH2 will work with NLDDFA-Wildlife Division to determine the appropriate format and timing for providing reports / data. WEGH2 acknowledges that Project-related effects on moose may be geographically dependent (i.e., each Moose Management Area [MMA] may be affected differently due to differences in moose densities and moose use of areas in relation to Project features). The 2024 moose survey will provide a better understanding of moose distribution and potential interactions with Project features (i.e., Port au Port wind farm, Codroy wind farm, transmission lines, hydrogen / ammonia plant) within the assessed areas (i.e., Project Area, Local Assessment Area and Regional Assessment Area) as well as provincial MMAs. WEGH2 is committed to developing site-specific mitigation measures, which will be reflected in the Environmental Protection Plan prior to Project construction at that site.
Supporting Documentation	None

Response to FFA 21

Comment ID:	FFA 21
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	Caribou Terrestrial Environment 4.3.3 a) ix: Pre-construction caribou baseline survey required 6.2 Predicted Environmental Effects of Project on e) caribou 7.1 Mitigations e) on caribou
Reviewer’s Comment:	Surveys are proposed for winter 2024 to gather information related to caribou presence/absence in relation to the provided Project footprint. Proponent/consultant to contact WD to confirm survey areas as project footprint has changed. Most significant effects on caribou anticipated due to habitat loss associated with road and windmill footprints and the significant increase in access provided by the road construction. The baseline information from surveys will inform geographically dependent mitigations based on cumulative effects of existing developments within these geographic areas.
Response:	WEGH2 is committed to continuing with Project-specific data collection in 2024. A permit (WLR2023-20) to complete caribou surveys was issued in 2023, and the same objective, methods, and surveys areas are being proposed for the 2024 survey. WEGH2 will continue to consult with the Newfoundland and Labrador Department of Fisheries, Forestry and Agriculture (NLDFFA)-Wildlife Division with respect to the survey approach and survey areas. Site-specific reports / data will be provided to regulators prior to Project construction at that site, and WEGH2 will work with NLDFFA-Wildlife Division to determine the appropriate format and timing for providing reports / data. WEGH2 acknowledges that Project-related effects on caribou may be geographically dependent. The 2024 caribou survey will provide additional information on caribou occurrence in the assessed areas (i.e., Project Area, Local Assessment Area and Regional Assessment Area) and CMA 61, and potential interactions with the Project (i.e., transmission lines, hydrogen / ammonia plant). WEGH2 is committed to mitigating potential effects on wildlife during Project construction and operation. Mitigation and monitoring protocols for wildlife, including caribou, will be included in the Environmental Protection Plan which will incorporate mitigation measures and monitoring commitments in the EIS and this EIS Amendment. They will be developed in consultation with applicable regulators and will be submitted for review prior to Project construction.
Supporting Documentation	None

Response to FFA 22

Comment ID:	FFA 22
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	Muskrat Terrestrial Environment 4.3.3 a) x: Pre-construction muskrat baseline survey required 6.2 Predicted Environmental Effects of Project on e) muskrat 7.1 Mitigations e) on muskrat
Reviewer’s Comment:	Surveys will be completed in fall between September 1 and November 1, 2023 No indication in EIS that habitat has been identified and delineated through outreach to locals, trappers (and FFA)
Response:	WEGH2 completed muskrat surveys in 2023 and the report is appended to this amendment as Appendix 2-D.
Supporting Documentation	Appendix 2-D 2023 Muskrat Technical Data Report

Response to FFA 23

Comment ID:	FFA 23
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	Arctic Hare - had not been identified in guidelines as guidelines focus on Port au Port only; in talks with consultant baseline surveys had been added to the list of requirements
Reviewer’s Comment:	Due to the extension of footprint this species needs to be added to the SOCC category as distribution is uncertain and potential overlap with/impacts from project components exists. Wildlife Division supplied Arctic Hare Pellet Survey protocol to proponent. The survey is proposed for late April/early May 2024.
Response:	WEGH2 is committed to continuing with data collection in 2024. Arctic Hare surveys are planned for spring 2024, and will follow the Arctic Hare Pellet Survey protocol provided by the Newfoundland and Labrador Department of Fisheries, Forestry and Agriculture (NLDFFA)-Wildlife Division. Site-specific reports / data will be provided to regulators prior to Project construction at that site. WEGH2 will work with NLDFFA-Wildlife Division to determine the appropriate format and timing for providing reports / data.
Supporting Documentation	None

Response to FFA 24

Comment ID:	FFA 24
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	Wetlands 2.1 Study Area c) describe 4.2.3 Terrestrial Environment 4.3.2 Aquatic Environment 6.2 Predicted Environmental Effects of the Undertaking c) on wetlands 7.1 Mitigations c) on wetlands
Reviewer's Comment:	Proponent acknowledges that there will likely be irreversible adverse changes to wetlands upstream from Gull (Mine) Pond. These permanent changes to wetland types upstream of Gull Pond will also likely result in the flooding of upland and wetland habitat types. Given the importance of wetland habitat, the many ecosystem services provided by wetlands and its role in carbon sequestration, it is unclear why the proponent needs to berm Gull Pond to increase water storage within it thereby negatively affecting upland habitat beyond what had already been done by the former Abitibi operations. Is there an off-set plan in terms of wetland compensation?
Response:	Berming of Gull Pond is required to meet the water requirements of the Project. Wetland compensation is not planned as it is not required by the Newfoundland and Labrador Policy for Development in Wetlands (Government of Newfoundland and Labrador 2001) and the Federal Policy on Wetland Conservation (Government of Canada 1991) does not generally apply to the Project. The Newfoundland and Labrador Department of Fisheries, Forestry and Agriculture - Wildlife Division has requested that the Federal Policy On Wetland Conservation be applied to the Project, but this has not been the case for other provincially regulated projects in Newfoundland and Labrador. The Project does not affect wetlands on federal land, is not receiving federal funding, and does not occur in an area of historical wetland loss, and therefore the federal policy does not apply to affected wetlands in full. As stated in Section IV.7 of the Federal Policy On Wetland Conservation Implementation Guide For Federal Land Managers (Environment Canada 1996), "... if federal authorization is required, on either federal or non-federal land, potential environmental effects on wetlands which would result from that authorization to proceed, can only be considered if: i) the affected wetland is on federal land; or, ii) the potential effects are within an area of federal jurisdiction. Otherwise, federal authorities can promote the conservation of wetlands through cooperative, voluntary means ...". The Federal Policy on Wetland Conservation is assumed to not generally apply to this Project, and thus there is no requirement for wetland compensation. It is possible there will be a nexus between wetlands and other federal legislation (e.g., the <i>Fisheries Act</i> , the <i>Migratory Bird Convention Act</i>), and in those specific cases, the application of the Federal Policy On Wetland Conservation will be discussed with the appropriate regulatory agency.

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	<p>References:</p> <p>Environment Canada. 1996. The Federal Policy on Wetland Conservation. Implementation Guide for Federal Land Managers. Available from the Canadian Wildlife Service, Environment Canada, Ottawa, ON.</p> <p>Government of Canada. 1991. The Federal Policy on Wetland Conservation. Canadian Wildlife Service, Environment Canada. Ottawa, ON.</p> <p>Government of Newfoundland and Labrador. 2001. Policy for Development in Wetlands - Environment and Climate Change .Available online: https://www.gov.nl.ca/ecc/waterres/regulations/policies/wetlands/ Last accessed: June 2023</p>
Supporting Documentation	None

Response to FFA 25

Comment ID:	FFA 25
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	<p>General</p> <p>6.2. (and likely other sections)</p> <p>Predicted Environmental Effects of the Undertaking on fauna and flora</p> <p>Cumulative Effects</p>
Reviewer’s Comment:	<p>A major project effect that does not seem to have been described in the EIS is the increased level of landscape fragmentation resulting from the development of new access and service roads, in addition to the footprint of individual turbines.</p> <p>The geographical scope of the project and amount of linear features will substantially reduce habitat connectivity, with potential impacts for plants and wildlife.</p> <p>Studies on the effects of linear feature density from the oil and gas sector in western Canada would be a good reference point to begin assessing landscape-scale impacts.</p>
Response:	<p>Although landscape fragmentation is not described explicitly in the Environmental Impact Statement (EIS), it is discussed in the assessment of a change in habitat, for both flora (Chapter 12 of the EIS) and terrestrial fauna (Chapters 13, 14 and 15 of the EIS).</p> <p>One of the main ways that landscape fragmentation can affect vegetation species and communities is through edge effects, which are discussed qualitatively in Sections 12.5.1, 12.5.2, 12.5.3, and 12.5.4 of the EIS. It is acknowledged that the Project will result in residual edge effects that will occur throughout the phases of the Project. The issues of increased spread of exotic and invasive species, as well as New York aster (<i>Symphyotrichum novi-belgii</i>), a native plant with conservation implications related to hybridization with Lindley’s aster (<i>Symphyotrichum ciliolatum</i>), are also related to habitat fragmentation and are also discussed in the above-mentioned sections of the EIS.</p>

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	Landscape fragmentation can also have adverse effects on bats (Section 14.5.1.1 of the EIS), avifauna (Section 13.5.1.1 of the EIS) and other wildlife (Section 15.5.1.1 of the EIS). Vegetation clearing and fragmentation creates habitat edges, and can subsequently result in edge effects. Edge effects include changes in microclimate, light, vegetation structure, and change to wildlife behaviour and presence. The effects of the creation of new edges varies by species. For example, some species prefer edge habitat and may increase in abundance along edges (e.g., American Robin [<i>Turdus migratorius</i>]), while habitat interior specialists (e.g., Swainson’s Thrush [<i>Catharus ustulatus</i>]) will avoid edge habitats. Habitat fragmentation can also result in changes to movements through the creation of barriers or loss of habitat connectivity. This can have particularly detrimental effects on species with large ranges (e.g., caribou [<i>Rangifer tarandus</i>]) and those that require large patches of homogenous habitat (e.g., marten [<i>Martes americana atrata</i>]), as well as species that require connectivity between different habitats (e.g., roosting and foraging areas for bats).
Supporting Documentation	None

Response to FFA 26

Comment ID:	FFA 26
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	Executive Summary pg. 9 Table ES.2: Summary of Follow-up and Monitoring Programs
Reviewer’s Comment:	In Table ES.2 “Summary of Follow- up and Monitoring Programs”, the proponent states that there will be no follow up or monitoring planned for the acoustic environment at this time. Noise pollution can affect animal behavior, particularly those that rely on the use of vocalization or echolocation for communication and navigation, such as whales. The Department of Fisheries, Forestry and Agriculture (FFA) recommends the establishment of an acoustic environment- monitoring plan throughout the project to monitor potential adverse effects.
Response:	In response to concerns from fishers in the area, and the request from FFA, WEGH2 will develop a noise and vibration monitoring program as part of the EPP for on land Project components.
Supporting Documentation	None

Response to FFA 27

Comment ID:	FFA 27
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	Section 1.3.5 pg. 21: Non- Governmental Participants in the Environmental Assessment
Reviewer’s Comment:	FFA notes that local fish harvesters or the FFAW are not included in this section and further highlights the importance of engagement with such stakeholders.
Response:	While local fish harvesters were engaged during several open houses, and during engagement activities with Indigenous Groups, WEGH2 also met with representative of the Fish, Food and Allied Workers –Unifor Union on December 11 and committed to ongoing engagement.
Supporting Documentation:	None

Response to FFA 28

Comment ID:	FFA 28
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	Section 2.5.6 pg. 66: Restoration of Existing Port Facilities
Reviewer’s Comment:	<p>The proponent states, “Some pile work will likely be required based on the final design of the offloading system and the dock restoration work”.</p> <p>Underwater sound pressure caused by pile driving may be deleterious to nearby fish. It is crucial to fish and fish habitat that mitigation measures are established prior to all pile work.</p> <p>FFA recommends the use of mitigation technologies such as bubble curtains, vibratory pile drivers, isolation casings, cofferdams, or hydro sound dampers when pile driving is required.</p>
Response:	WEGH2 will evaluate mitigation technologies associated with pile driving.
Supporting Documentation:	None

Response to FFA 29

Comment ID:	FFA 29
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	Section 2.0 pg. 91: Biosecurity in Relation to Aquatic Invasive Species and the Movement of International Vessels
Reviewer’s Comment:	<p>While it is positive that the proponent recognizes biosecurity in relation to Aquatic Invasive Species (AIS) and the Movement of International Vessels via ballastwater exchange, it is important to highlight that there are multiple pathways of AIS introduction.</p> <p>AIS are an increasing risk to the provinces native species, habitats, ecological structures and cultured fish. A coordinated approach is needed to prevent and mitigate the introduction and spread of harmful AIS, including the European Green Crab, which has confirmed presence throughout the Bay St. George region.</p> <p>Both FFA and Fisheries and Oceans Canada (DFO) regularly encourage project proponents to exercise best practices to help prevent the introduction and spread of AIS.</p> <p>To help mitigate the potential spread of AIS, the proponent should follow recommended best practices and guidelines.</p> <p>As there will be shipping activity for this project within the Bay St. Georges area, including to and from the Port of Stephenville, it is recommended that vessels are inspected for biofouling of Vase tunicate and presence of European green crab. These practices are critical for ensuring that harmful AIS are not spread to other areas throughout the region.</p> <p>Best practices to prevent the introduction and spread of AIS include:</p> <ul style="list-style-type: none"> • AIS awareness in waters frequented • Taking precautions with respect to vessel traffic and gear movement between affected and unaffected areas to prevent introductions and spread • Clean, drain and dry gear and ropes to prevent movement between areas by avoiding transportation of water from one location to another • Routine vessel maintenance (i.e. cleaning the hull and using antifouling paint to prevent biofouling) • Identifying and reporting any AIS to DFO <p>Additional information regarding AIS in the NL Region can be found on the Aquatic Invasive Species website. https://www.dfo-mpo.gc.ca/species-especies/ais-eae/index-eng.html</p>
Response:	WEGH2 acknowledges the risk that Aquatic Invasive Species (AIS) pose and will consult with the Newfoundland and Labrador Department of Fisheries, Forestry and Agriculture and Fisheries and Oceans Canada in the development of the Environmental Protection Plan to include best management practices to avoid introduction of AIS.
Supporting Documentation:	None

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Response to FFA 30

Comment ID:	FFA 30
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	Section 2.8.2 pg. 96 Noise and Vibration
Reviewer's Comment:	<p>In section 2.8.2, it is stated that there will be an increase in noise and vibration within the project area as a byproduct of increased vessel traffic, project construction and operation of turbines and the ammonia plant.</p> <p>It is important to recognize that anthropogenic noise and vibration can cause auditory masking, leading to changes in individual and social behavior of marine species, hinder population recruitment and ultimately affecting the health of marine ecosystems.</p> <p>FFA recommends reduced vessel speeds as a method to reduce excess noise and vibration.</p> <p>Additionally, the proposed project area holds economic and ecological value, FFA further encourages the establishment of a noise and vibration monitoring plan to monitor potential long term effects.</p>
Response:	WEGH2 will include a reduced vessel speed requirement for Project related vessels as part of the Environmental Protection Plan (EPP). A noise and vibration monitoring plan will also be part of the EPP for on land Project components.
Supporting Documentation:	None

Response to FFA 31

Comment ID:	FFA31
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	4.2.1 pg.4 Table 4.1 Key Stakeholders and Indigenous Groups:
Reviewer's Comment:	FFA recommends the addition of local harbor authorities and the FFAW to this table.
Response:	Agreed. Local harbour authorities and the Fish, Food and Allied Workers - Unifor Union will be added to the key stakeholders list.
Supporting Documentation:	None

Response to FFA 32

Comment ID:	FFA32
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	Section 11.4 pg. 27 Table 11.5: Mitigation Measures: Marine Environment and Use
Reviewer’s Comment:	<p>ID # 100 “Consultation with local fish harvesters and other stakeholders will be undertaken regarding marine related activities that may interact with fisheries.” FFA recommends consultation with local fish harvesters be undertaken during all stages of the project and not only during the constructional phase as listed.</p> <p>ID # 221 “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)”. FFA recommends that if pile driving is required that the use of quieting technologies will be used to reduce noise and adverse effects to the marine environment.</p>
Response:	Agreed. Local fish harvesters will be engaged throughout all stages of the Project. WEGH2 will investigate the use of mitigations to reduce the noise from pile driving.
Supporting Documentation:	None

Response to FFA 33

Comment ID:	FFA 33
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	4.2 Existing Environment
Reviewer’s Comment:	See general comments below.
Response:	No response required.
Supporting Documentation	None

Response to FFA 34

Comment ID:	FFA 34
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	4.2.4. Land and Resource Use
Reviewer's Comment:	See general comments below.
Response:	Noted, thank you.
Supporting Documentation	None

Response to FFA 35

Comment ID:	FFA 35
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	4.3.4 Land and Resource Use
Reviewer's Comment:	FFA (Agriculture and Lands Branch) was not included in the EIS Guidelines for consultation given that a Crown lands application will be required. Consultation prior to submitting an application for Crown lands is suggested. See general comments below.
Response:	Noted, thank you. WEGH2 consulted with the Newfoundland and Labrador Department of Fisheries, Forestry and Agriculture (NLDFFA) - Agriculture and Lands Branch prior to submission of the EIS and prior to submission of this EIS Amendment. WEGH2 will further consult with NLDFFA - Agriculture and Lands Branch in advance of the final Crown lands application for the Project.
Supporting Documentation	None

Response to FFA 36

Comment ID:	FFA 36
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	7.1 Mitigations
Reviewer's Comment:	See general comments below.
Response:	Noted. Thank you.
Supporting Documentation	None

Response to FFA 37

Comment ID:	FFA 37
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	General
Reviewer's Comment:	The GIS and Mapping Division has identified fourteen (14) geodetic control monuments located within 100m of the proposed project areas. Please see attached map. While no monument directly intersects with the shapefiles provided, the dimensions of the line may increase and potentially affect a monument. An attempt should be made to avoid disturbance within five metres of any monument for any development that occurs.
Response:	Noted, thank you. WEGH2 will consult the Geodetic Network shapefiles during detailed design and will contact the GIS and Mapping Division if there is potential for disturbing existing control survey markers.
Supporting Documentation	None

Response to FFA 38

Comment ID:	FFA 38
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	General
Reviewer’s Comment:	Under the <i>Lands Act</i> a surveyor may enter upon lands at any time for the purpose of making observations to or from a control survey marker. The <i>Lands Act</i> also provides that a person who knowingly or willfully pulls down, defaces, alters or removes a control survey marker is guilty of an offence and liable on summary conviction to a fine not exceeding \$500 or imprisonment for a period not exceeding three (3) months.
Response:	Noted. Thank you.
Supporting Documentation	None

Response to FFA 39

Comment ID:	FFA 39
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	General
Reviewer’s Comment:	GIS and Mapping Division is required to be contacted (GMD@gov.nl.ca) if works within the project have the potential of disturbing an existing Control Survey Marker. The locations of the markers can also be viewed at NL Geodetic Network (arcgis.com). Attached are the shapefiles for the markers within 10m and within 100m of the project.
Response:	Noted, thank you. WEGH2 will consult the Geodetic Network shapefiles during detailed design and will contact the GIS and Mapping Division if there is potential for disturbing existing control survey markers.
Supporting Documentation	None

Response to FFA 40

Comment ID:	FFA 40
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	General
Reviewer's Comment:	<p>This review included the assessment of potential impacts on Agriculture Development Areas (ADA's), Agriculture Areas of Interest (AOI's), Crown Land Agriculture Leases and Agriculture Licenses (Pastures). Within the area outlined for the proposed Port au Port-Stephenville Wind Power and Hydrogen Generation Project, the Agriculture Lands Section would like to recognize the future growth of the agriculture industry in this area and the requirement of Crown Lands being available within ADA's and AOI's for future agriculture production. Please consider the following statements derived from this review:</p> <p>The proposed project area overlaps the Port au Port Agriculture Development Area (ADA) and the proposed Transmission Line 230kV of the project intersects an Agriculture Areas of Interest (AOI's).</p> <p>Furthermore, the proposed Transmission Line 230kV of the project intersects with agriculture properties. In general, FFA does not have any concerns with the proposed activities at this time; however, where possible, overlap with existing farms should be avoided. If activities should overlap with agriculture areas and future production in this area, FFA will work with the proponent to mitigate any potential issues.</p> <p>All constructed resource roads for this project are to remain open for public access to facilitate operational requirements to access agriculture lands, cottages, forestry, mineral exploration, areas of interest and other users into the future.</p> <p>The proposed project area is large and includes, functional turbines, functional ammonia plant and mitigations. From an agricultural perspective the environmental assessment is comprehensive; no issues or omissions were identified with any of the environmental assessments as it pertains to the Agriculture sector in the Province of Newfoundland and Labrador.</p> <p>The project area lies within the boundary of seven different Agriculture Areas of Interest (AOIs) however the Department does not consider the Nujio'qonik project to be a hindrance to the continued growth and development of the agriculture sector in the Province. Any development within or outside of the AOI's should not overlap existing farmland and appropriate mitigations (such as buffers) may be required.</p> <p>One of the aspects of this project that may be of interest to the agriculture industry is the production of anhydrous ammonia on the island of Newfoundland. Anhydrous ammonia is a major nitrogen fertilizer used in the production of potatoes and high value horticultural crops in Canada (https://fertilizercanada.ca/our-focus/safety-security/standardized-codes-of-practices/anhydrous-ammonia/). The potential for cooperation with the wind industry around the use of anhydrous ammonia may be something to explore in the future.</p>

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Response:	WEGH2 notes the reviewer's comments with respect to Project access roads remaining open to public access, development within Agriculture Areas of Interest, buffers on existing farmlands, and future potential cooperation with the agriculture industry. Thank you. As indicated in the EIS, WEGH2 intends for access roads constructed as part of the Project to remain open for public access during operation of the Project.
Supporting Documentation	None

Response to FFA 41

Comment ID:	FFA 41
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	General
Reviewer's Comment:	<p>The project area as defined mostly appears to be on Crown lands however private lands may also be within the project area. Applications for Crown lands will be accepted and processed per the usual Crown lands referral process and issuance of any title related to this project will be subject to the completion of a review/referral process independent of the Environmental Assessment process, but will also be subject to a release from the EA process. Because comments and approvals regarding land tenure will be provided through the Crown lands application process, approval of the project sites as defined cannot be provided at this time. Any approval of Crown lands for this project will be subject to conditions provided through the referral process and will consider things such as buffers, permitting and other conditions once the project footprint is applied for.</p> <p>Project activities will be subject to provisions of the Lands Act, including work within 15 m of a waterbody (s.7).</p> <p>There is currently no Crown lands application submitted for this project outside of applications for individual MET towers. Applications for Crown lands will only be accepted for available Crown lands and will not include lands that are encumbered, titled or otherwise unavailable.</p> <p>Environment Canada should be consulted in the EA process given the potential impact to weather radar.</p> <p>All constructed resource roads for this project are to remain open for public access to facilitate operational requirements to access agriculture lands, cottages, forestry, mineral exploration, areas of interest and other users into the future.</p>

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Comment ID:	FFA 41
Response:	<p>Noted, thank you. An application for Crown land for the overall Project will be submitted to Agriculture and Lands Branch and we understand that it will not be put forward for approval until the Project is released from the environmental assessment process. We also understand that approval for Crown land would be subject to conditions, such as buffers and permitting.</p> <p>WEGH2 requested guidance / advice from Environment and Climate Change Canada regarding weather radar and received a response in April 2023 (Appendix FFA41-A).</p> <p>As indicated in the EIS, WEGH2 intends for access roads constructed as part of the Project to remain open for public access during operation of the Project.</p>
Supporting Documentation	Appendix FFA41-A Weather Radar Advice / Guidance from Environment and Climate Change Canada

Response to FFA 42

Comment ID:	FFA 42
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	General
Reviewer’s Comment:	<p>Portions of the proposed project area falls within the Crabbe’s River Cottage Development Planning Area. FFA does not oppose this project within the cottage planning areas. However, future cottage development may take place within the boundaries of the cottage planning area. The safety of cottage owners and other recreational users should be kept in mind during proposed operations. Appropriate buffers around existing and planned cottage areas will need to be considered.</p>
Response:	Noted, thank you. WEGH2 will work with Agriculture and Lands Branch during detailed design to manage the Project footprint within the Crabbe’s River Cottage Development Planning Area.
Supporting Documentation	None

Response to FFA 43

Comment ID:	FFA 43
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	General
Reviewer’s Comment:	Any wind power structure or turbine developed in coastal areas, near or within the marine environment, creates potential for detrimental disturbances to coastal habitats and marine life. To mitigate any negative impacts on the marine environment and local fisheries the Department of Fisheries, Forestry and Agriculture advises that proponents must consult local fish harvesters for information regarding fisheries in the area.
Response:	Noted, thank you. WEGH2 consulted with the Fish, Food and Allied Workers - Unifor Union in December 2023 to discuss the Project and the concerns of its membership (see Chapter 3 of this document). To better understand the extent of local fishery activity and species harvested in the Marine Regional Assessment Area, WEGH2 reviewed community-based coastal inventory data from 1996-2007 for pelagic species, groundfish species and shellfish. See Figures FFA43-1, FFA43-2, and FFA43-3 in Appendix FFA43-A. While this information provides additional context for fisheries in the Marine Regional Assessment Area, it does not change the conclusions of the residual effects assessment in the EIS. The EIS assumed that fishing activities were present in the area and would be affected by Project activities. The residual effects assessment relied on mitigation measures applied to Project activities, which were not species specific, to reduce Project effects. Therefore, the conclusions of the assessment on Marine Environment and Use remain valid.
Supporting Documentation	Appendix FFA43-A Community-Based Coastal Resource Inventory Maps

Response to FFA 44

Comment ID:	FFA 44
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	General
Reviewer’s Comment:	Harvesters can be consulted directly, by way of local Small Craft Harbour authorities or through the Fish, Food and Allied Workers Union (FFAW). The department also advises that proponents must consult the federal Department of Fisheries and Oceans’ Fish and Fish Habitat Protection Program to request a review of the project to assess potential risks and impacts on the conservation and protection of fish and fish habitat.
Response:	Noted, thank you. WEGH2 consulted with the Fish, Food and Allied Workers - Unifor Union (FFAW) in December 2023 to discuss the Project and the concerns of its membership (see Chapter 3 of this Environmental Impact Statement (EIS) Amendment). In addition, WEGH2 consulted with Fisheries and Oceans Canada (DFO) during preparation of the EIS, as well as to review their comments included in this EIS Amendment. WEGH2 has committed to continuing engagement with local fishers through the FFAW, as we advance the design of the marine components and during the permitting phase of the Project. WEGH2 will also continue to consult with DFO on the Project over the course of the Project including but not limited to the permitting phase.
Supporting Documentation	None

Response to FFA 45

Comment ID:	FFA 45
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	General
Reviewer’s Comment:	<p>Chapter 12: Wetlands and Vegetation, Including Rare Plants</p> <p>(a) In general, some of the data on plants (AC CDC) is out of date; in some instances that reflects the state of the plant database, and missing updated documents on the Department website. The proponent has been encouraged to communicate with WD regarding the use of the AC CDC database and other documents for this project.</p> <p>(b) To stay consistent with other past projects, Species of Conservation Concern include species up to S2S3 Rank.</p> <p>(c) Table 12.1 – ‘Rock Barrens with Vegetation’ – words missing from text description; ‘Recently Harvested’ – could also be interpreted as non- regeneration following insect-kill</p> <p>(d) Page 12.11 – Data request from AC CDC: limited to LAA and ‘surrounding areas’ – does this include the RAA?</p> <p>(e) Page 12.11– Much of the knowledge of culturally important plant species likely lies with Elders and other knowledge holders, especially for local information</p> <p>(f) Page 12.11 – Reference to ‘reconnaissance-level field surveys’ – more details on these surveys (locations, results) should be provided in the absence of comprehensive field surveys.</p> <p>(g) Page 12.12 – Please note that critical habitat areas have also been identified and submitted to the Minister for three species, Mackenzie’s Sweetvetch, Low Northern Rockcress, and Woolly Arnica on the Southern Limestone Barrens (August 2023).</p>
Response:	<p>(a) WEGH2 will communicate with the Newfoundland and Labrador Department of Fisheries, Forestry and Agriculture – Wildlife Division (NLDDFA-Wildlife Division) regarding the use of the Atlantic Canada Conservation Data Centre (AC CDC) database and other documents for this Project.</p> <p>(b) WEGH2 has updated the inclusion of Species of Conservation Concern (SOCC) to include species up to S2S3 Rank. Twenty-eight vascular plant SOCC provincially ranked S2S3 are known to occur in the RAA (Table FFA 45.1).</p> <p>(c) The Object Based Image Analysis Land Cover Classification (LCC) types have been revised since the Environmental Impact Statement (EIS) was submitted. For example, the LCC unit ‘Rock Barrens with Vegetation’ is now combined with ‘Rock Barrens’, and the LCC unit ‘Recently Harvested’ is now part of ‘Regenerating Forest’.</p> <p>The Rock Barrens LCC unit can contain sparse and dwarfed trees such as black spruce (<i>Picea mariana</i>) and balsam fir (<i>Abies balsamea</i>), and is typically dominated by the shrubs ground juniper (<i>Juniperus communis</i>), golden-hardhack</p>

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	<p>(<i>Dasiphora fruticosa</i>), creeping juniper (<i>Juniperus horizontalis</i>), and black crowberry (<i>Empetrum nigrum</i>). Herbaceous species including bulrush sedge (<i>Carex scirpoidea</i>) and hairy goldenrod (<i>Solidago hispida</i>), dwarf dogwood (<i>Cornus canadensis</i>), and three-toothed cinquefoil (<i>Sibbaldia tridentata</i>), are frequent at low abundances.</p> <p>Full descriptions of these LCC units are provided in the Land Cover Classification and Rare Plants Technical Data Report – Port au Port Wind Farm (Appendix 2-C).</p> <p>(d) The Area of Interest (AOI) submitted to the AC CDC for data export encompasses 1,641 km². This AOI encompasses an initial Project area and adjacent habitat, determined before the Project footprint was finalized. This AOI presently encompasses 96% (738 km²) of the terrestrial LAA and 44% (1,607 km²) of the terrestrial RAA, including 100% of the terrestrial LAA and RAA on the Port au Port Peninsula, with the exception of areas within the ocean surrounding the peninsula. If available from NLDDFA-Wildlife Division, WEGH2 will obtain new AC CDC records for the RAA once the Project footprint is finalized.</p> <p>(e) Thank you, noted. WEGH2 is leading Indigenous engagement independently by working directly with Indigenous organizations.</p> <p>(f) Targeted reconnaissance level field surveys were completed to inform subsequent detailed surveys. Additional detailed surveys were conducted in 2023. The locations and results of surveys conducted in 2023 are provided in Land Cover Classification and Rare Plants Technical Data Report – Port au Port Wind Farm (Appendix 2-C).</p> <p>(g) WEGH2 received data providing the critical habitat for the noted species immediately prior to submitting this EIS Amendment. WEGH2 will review the data, work with NLDDFA – Wildlife Division, and it will be considered during final Project design.</p>
Supporting Documentation	<p>Appendix 2-C Land Cover Classification and Rare Plants Technical Data Report – Port au Port Wind Farm</p> <p>Table FFA45.1 AC CDC Records of Vascular Plant SOCC in the Project Footprint, Project Area, LAA, and RAA</p>

Table FFA45.1 AC CDC Records of Vascular Plant SOCC in the Project Footprint, Project Area, LAA, and RAA

Scientific Name	Common name	NF S Rank ¹	Number of Known Occurrences ²			Habitat Notes ³
			Project Area	LAA	RAA	
Port au Port Subregion (and Corner Brook Subregion)						
<i>Amelanchier fernaldii</i>	Fernald serviceberry	S1	1	1	1	Brooksides and damp bush ravines
<i>Calypso bulbosa</i> var. <i>americana</i>	fairy slipper	S1	0	4	4	Coastal limestone barren; low heath
<i>Packera cymbalaria</i>	dwarf arctic groundsel	S1	10	14	14	Limestone barrens
<i>Scirpus pedicellatus</i>	stalked bulrush	S1	1	1	1	Wet depression in fir forest
<i>Sphenopholis intermedia</i>	slender wedge grass	S1	1	1	1	Calcareous gravelly bank
<i>Ranunculus recurvatus</i>	hooked crowfoot	S1S2	1	1	1	Wooded calcareous gravelly bank
<i>Oxytropis campestris</i> var. <i>johannensis</i>	St. John's oxytrope	S1S3	0	1	1	Limestone barrens
<i>Boechera stricta</i>	Drummond's rockcress	S2	0	2	2	Limestone barren, disturbed ground
<i>Bolboschoenus maritimus</i> subsp. <i>paludosus</i>	saltmarsh bulrush	S2	0	0	1	Tidal flats behind barachois (coastal lagoon)
<i>Botrypus virginianus</i>	rattlesnake fern	S2	0	0	1	Juniper dominated bowl at toe of slope
<i>Carex concinna</i>	beautiful sedge	S2	0	1	1	No information
<i>Carex hostiana</i>	Host's sedge	S2	3	6	6	Fen, marsh, alpine meadow, boggy spot in limestone barrens
<i>Carex umbellata</i>	hidden sedge	S2	0	4	5	No information
<i>Cystopteris laurentiana</i>	Laurentian bladder fern	S2	0	2	3	Crack in limestone pavement
<i>Drosera linearis</i>	slender-leaved sundew	S2	4	4	5	Fen, and edge of fen pools

Table FFA45.1 AC CDC Records of Vascular Plant SOCC in the Project Footprint, Project Area, LAA, and RAA

Scientific Name	Common name	NF S Rank ¹	Number of Known Occurrences ²			Habitat Notes ³
			Project Area	LAA	RAA	
<i>Festuca altaica</i>	northern rough fescue	S2	0	0	1	Upper slope of barren limestone plateau, open heath
<i>Festuca saximontana</i> var. <i>saximontana</i>	rocky mountain fescue	S2	1	2	2	Limestone barrens
<i>Juncus nodosus</i>	knotted rush	S2	1	3	7	Wet habitats including fens, and beach around pond
<i>Platanthera hookeri</i>	Hooker's orchid	S2	0	41	48	Limestone barren, open to dense heath/ scattered tuckamore
<i>Potamogeton friesii</i>	Fries' pondweed	S2	0	1	1	Pond
<i>Salix ballii</i>	Ball's willow	S2	2	3	3	Brookside, limestone tableland bushy ravine or mossy knoll
<i>Stuckenia filiformis</i> subsp. <i>occidentalis</i>	western threadleaf pondweed	S2	0	0	1	Brook within fen with mud over limestone substrate
<i>Astragalus alpinus</i>	alpine milkvetch	S2S3	0	1	1	Limestone heath, near crest of large flat hill
<i>Betula minor</i>	dwarf white birch	S2S3	1	2	6	In tuckamore and heath, associated with limestone slopes
<i>Carex novae-angliae</i>	New England sedge	S2S3	0	0	2	No information
<i>Carex sterilis</i>	dioecious sedge	S2S3	0	0	1	Sandy-gravelly beach adjacent to pond
<i>Cystopteris bulbifera</i>	bulblet bladder fern	S2S3	0	1	1	On organic soil in cracks of vertical limestone cliffs
<i>Festuca brachyphylla</i> subsp. <i>brachyphylla</i>	shortleaf fescue, alpine fescue	S2S3	1	2	2	Dry exposed ledges and limestone barrens

Table FFA45.1 AC CDC Records of Vascular Plant SOCC in the Project Footprint, Project Area, LAA, and RAA

Scientific Name	Common name	NF S Rank ¹	Number of Known Occurrences ²			Habitat Notes ³
			Project Area	LAA	RAA	
<i>Festuca rubra</i>	red fescue	S2S3	0	2	8	Limestone barrens slopes, snowbed meadows, various soils in brackish and riparian areas
<i>Graphephorum melicoides</i>	purple false oats	S2S3	1	1	3	Mossy spruce woods, ephemeral watercourse channel, shore of watercourse
<i>Limonium carolinianum</i>	sea-lavender	S2S3	0	0	9	Coastal shores, tidal flats, and salt marshes
<i>Milium effusum</i> var. <i>cisatlanticum</i>	tall millet-grass	S2S3	1	1	1	Alder thicket within balsam fir forest, moist soils
<i>Myriophyllum sibiricum</i>	common water-milfoil	S2S3	0	1	1	In ponds
<i>Oxyria digyna</i>	mountain sorrel	S2S3	0	0	1	River gravel
<i>Parnassia palustris</i>	marsh grass-of-parnassus	S2S3	0	0	1	Dry, steep scree slope with low shrubs
<i>Potentilla crantzii</i>	Crantz's cinquefoil	S2S3	0	0	2	Sparse limestone barrens and low heath
<i>Potentilla litoralis</i>	coastal cinquefoil	S2S3	0	1	1	No information
<i>Potentilla neumanniana</i>	Crantz's cinquefoil, northern cinquefoil	S2S3	0	0	1	Sparsely vegetated limestone rock barren
<i>Ranunculus macounii</i>	Macoun buttercup	S2S3	0	1	1	On organic soil in cracks of vertical limestone cliffs
<i>Sabulina dawsonensis</i>	rock stitchwort	S2S3	3	4	5	On dry, sparsely vegetated limestone barrens
<i>Solidago sempervirens</i> subsp. <i>sempervirens</i>	seaside goldenrod	S2S3	0	0	5	Coastal shores, tidal flats, and salt marshes

Table FFA45.1 AC CDC Records of Vascular Plant SOCC in the Project Footprint, Project Area, LAA, and RAA

Scientific Name	Common name	NF S Rank ¹	Number of Known Occurrences ²			Habitat Notes ³
			Project Area	LAA	RAA	
Total			32	109	161	-
St. George's Bay Subregion						
<i>Amelanchier fernaldii</i>	Fernald serviceberry	S1	0	0	1	Open muskeg
<i>Anemone virginiana</i> var. <i>alba</i>	Virginia anemone	S1	0	0	1	Alluvial island shore
<i>Carex retrorsa</i>	retrorse sedge	S1	0	0	1	Beaver cattail pool
<i>Dennstaedtia punctilobula</i>	hay-scented fern	S1	0	2	2	Dry peat, deciduous shrub
<i>Dryopteris marginalis</i>	marginal wood fern	S1	1	1	1	No information
<i>Carex pseudocyperus</i>	cyperus-like sedge	S2	3	4	7	Beaver and/or cattail marsh
<i>Crataegus chrysocarpa</i> var. <i>chrysocarpa</i>	fineberry hawthorne	S2	0	5	7	Shores, river banks, forest edge
<i>Elatine minima</i>	small water-wort	S2	0	1	1	Sandy lake shallows
<i>Juncus nodosus</i>	knotted rush	S2	0	0	1	Marsh, fen, meadow, wet spot in mossy woods, flood plain depression
<i>Neottia auriculata</i>	auricled twayblade	S2	0	0	2	Banks of brook above pond
<i>Polygonum oxyspermum</i> subsp. <i>raii</i>	Ray's knotweed	S2	0	0	1	Beach
<i>Schoenoplectus tabernaemontani</i>	soft-stem bulrush	S2	0	0	1	No information
<i>Sporobolus alterniflorus</i>	saltwater cordgrass	S2	2	2	5	Pebble/cobble shoreline or open sand berm moist-mesic saline
<i>Sporobolus pumilus</i>	salt-meadow cordgrass	S2	0	0	4	No information

Table FFA45.1 AC CDC Records of Vascular Plant SOCC in the Project Footprint, Project Area, LAA, and RAA

Scientific Name	Common name	NF S Rank ¹	Number of Known Occurrences ²			Habitat Notes ³
			Project Area	LAA	RAA	
<i>Symphotrichum lanceolatum</i> var. <i>lanceolatum</i>	panicked aster	S2	0	0	2	River gravel, spruce and birch forest
<i>Utricularia purpurea</i>	greater purple bladderwort	S2	0	2	2	Lake shallows, sandy
<i>Dichanthelium acuminatum</i> var. <i>fasciculatum</i>	western witchgrass	S2S3	2	3	3	Dry riverbank and pool shoreline in alder thicket, cobble lakeshore
<i>Festuca rubra</i>	red fescue	S2S3	1	3	3	Sandy and boulder shores, roadside
<i>Glyceria grandis</i>	American mannagrass	S2S3	2	3	3	No information
<i>Hordeum jubatum</i>	fox-tail barley	S2S3	1	1	1	Open sand berm
<i>Limonium carolinianum</i>	sea-lavender	S2S3	2	2	3	Coastal shorelines and sand berms
<i>Milium effusum</i> var. <i>cisatlanticum</i>	tall millet-grass	S2S3	0	0	1	Moist alluvial soil in balsam poplar and alder stand
<i>Myriophyllum sibiricum</i>	common water-milfoil	S2S3	1	1	1	In ponds
<i>Myriophyllum verticillatum</i>	whorled water-milfoil	S2S3	1	1	1	In ponds
<i>Pyrola elliptica</i>	shinleaf	S2S3	1	2	2	Gravel roadside
<i>Sagittaria latifolia</i>	broad-leaved arrowleaf	S2S3	0	1	1	Shallow area of lake
<i>Salix serissima</i>	autumn willow	S2S3	0	0	1	In standing water in a floodplain marsh, organic soil
<i>Solidago sempervirens</i>	seaside goldenrod	S2S3	1	1	1	Upper shore of coastal area
Total			18	35	60	-

Table FFA45.1 AC CDC Records of Vascular Plant SOCC in the Project Footprint, Project Area, LAA, and RAA

Scientific Name	Common name	NF S Rank ¹	Number of Known Occurrences ²			Habitat Notes ³
			Project Area	LAA	RAA	
Codroy Subregion						
<i>Dennstaedtia punctilobula</i>	hay-scented fern	S1	1	1	1	Grassy area on transmission line
<i>Equisetum hyemale</i>	rough horsetail	S1	0	1	1	Grassy meadow, along shoreline
<i>Festuca rubra</i>	red fescue	S2S3	0	0	1	Sand, cobble, and boulder beach on shore of river
<i>Glyceria grandis</i>	American mannagrass	S2S3	0	1	1	No information
<i>Mitchella repens</i>	partridge-berry	S2S3	0	10	12	In sphagnum moss within a black spruce swamp, edge of bog transition to tuckamore, graminoid-dominated wetland
<i>Sparganium fluctuans</i>	floating bur-reed	S2S3	0	5	5	Grassy meadow and near shorelines
Total			1	18	21	-
Source: AC CDC Data Request (2023) Notes: ¹ Provincial S Rank is S Rank 2020 for the Island of Newfoundland from AC CDC (2024) ² Records are cumulative (i.e., records in the Project Area are also in the LAA and the RAA) ³ Habitat notes summarized from AC CDC provided data (AC CDC 2023)						

References:

AC CDC. 2023. GH2 Project SAR (Species At Risk) and SOCC (Species of Conservation Concern) Data from AC CDC [Shapefile]. Data request March 2, 2023.

AC CDC (Atlantic Canada Conservation Data Centre). 2024. Newfoundland and Labrador Vascular Plant Species Ranks. Provided by A. Durocher of AC CDC via email on January 10, 2024.

Response to FFA 46

Comment ID:	FFA 46
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	General
Reviewer’s Comment:	<p>Page 12.15 – “Of the four lichen species, all but boreal felt lichen (<i>Erioderma pedicellatum</i>), are likely to occur within the Project Area.”</p> <ul style="list-style-type: none"> Not enough weight has been given to the possibility of listed lichens occurring in the RAA, LAA, and PA - project specific surveys should include all listed lichen species in areas of suitable habitat
Response:	<p>Lichens were collected from 73 land cover classification plots on the Port au Port Peninsula in 2023, and specimens are in the process of being identified. These results will be provided to regulators prior to Project construction, either as a standalone submission or as part of developing the required mitigation and monitoring plans (e.g., Species at Risk Impacts Mitigation and Monitoring Plan). WEGH2 will engage Newfoundland and Labrador Department of Fisheries, Forestry and Agriculture (NLDDFA-Wildlife Division) in the development of the required Species at Risk Impacts Mitigation and Monitoring Plans.</p>
Supporting Documentation	None

Response to FFA 47

Comment ID:	FFA 47
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	General
Reviewer’s Comment:	<p>(a) Page 12.16 – “Recovery or management plans are available for one of the ten provincially listed plant SAR, low northern rock cress (<i>Braya humulis</i>) (NLDDFA 2021).”</p> <ul style="list-style-type: none"> Factually incorrect; Woolly Arnica, Lindley’s Aster, MacKenzie’s Sweetvetch, and Low Northern Rockcress are included in the Limestone Barrens Species at Risk Recovery Plan (4/10 species). Draft plans available for three additional species (Black Ash, Red Pine, Feathery False Solomon’s Seal). <p>(b) Table 12.5 – NL Land Use Inventory column should be removed; low spatial accuracy of records does not allow this level of detail</p> <ul style="list-style-type: none"> <i>Ranunculus gmelinii</i> – Also an additional record at Robinson’s River <i>Symphotrichum ciliolatum</i> – All records in the RAA (outside of LAA and PA) are considered historical <i>Fraxinus nigra</i> – Also Barachois Pond Provincial Park and other areas

Project Nujio’qonik: Amendment to The Environmental Impact Statement

<p>Comment ID:</p>	<p>FFA 47</p>
	<ul style="list-style-type: none"> • <i>Pinus resinosa</i> – There is a possibility that these trees may have been plants, in which case they’re not protected under ESA <p>(c) Page 12.18 – “The majority of these SOCC have been observed on the Port au Port Peninsula and on Table Mountain.”</p> <ul style="list-style-type: none"> • This statement needs to be accompanied by a caveat that there have been few botanical searches in the area of the Codroy wind farm, and the lack of SOCC observations is therefore biased by prior survey effort. <p>(d) Table 12.6 – It should be clearly stated throughout the document that ‘occurrences’ do not directly represent numbers of individuals or reflect population sizes. Data in the EIS should permit an assessment of the intensity of the project impacts to a species, which includes estimates of the number of individuals impacted.</p>
<p>Response:</p>	<p>Please consider the text in the Environmental Impact Statement (EIS) to be revised as follows: “Provincial recovery or management plans are publicly available for the following provincially listed plant SAR known to occur within or near the Project Area: low northern rock cress (<i>Braya humilis</i>) (NLDDFA 2021), woolly arnica (<i>Arnica angustifolia</i> subsp. <i>tomentosa</i>), Lindley’s aster (<i>Symphotrichum ciliolatum</i>), Mackenzie’s sweetvetch (<i>Hedysarum boreale</i> subsp. <i>mackenzii</i>) (Limestone Barrens Species at Risk Recovery Team 2021).”</p> <p>Draft plans for black ash, red pine, and feathery false Solomon’s seal have been requested but are not currently publicly available.</p> <p>Please also consider the text in the EIS to be revised as follows: “The majority of these SOCC have been observed on the Port au Port Peninsula and on Table Mountain.”</p> <p>Please consider the NL Land Use Inventory column to be removed from Table 12.5 in the EIS and the additional species records and notes to be added to the table.</p> <p>Please consider the text in the EIS to be revised as follows: “The majority of these SOCC have been observed on the Port au Port Peninsula and on Table Mountain; however, it is notable that these are also the areas that have been most extensively surveyed and the distribution of SOCC observations within the Project Area may be at least partially biased by prior survey effort.”</p> <p>Noted. Thank you. The Wetland and Vegetation assessment within the EIS includes multiple references to occurrences (such as in Table 12.6) and does not equate occurrences to number of individuals.</p>
<p>Supporting Documentation</p>	<p>None</p>

Response to FFA 48

Comment ID:	FFA 48
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	General
Reviewer’s Comment:	The sole use of AC CDC data, collected for various purposes over a number of years, do not reflect the complete set of species present on the landscape, do not reflect population sizes, and are biased towards areas that are easily accessible.
Response:	WEGH2 recognizes the Atlantic Canada Conservation Data Centre (AC CDC) data does not reflect a complete inventory of species present on the landscape, does not include population sizes, and is potentially biased towards areas easily accessible. The AC CDC data is, however, helpful in identifying what species are known to occur in the various Project assessment areas and locations of species of conservation concern (SOCC) and species at risk (SAR). Project specific surveys were conducted for the Port au Port Wind Farm, associated collector lines, and access roads in 2023. Results from the 2023 surveys and available AC CDC data is being used to further support Project planning and mitigation. The locations and results of surveys conducted in 2023 are provided in Land Cover Classification and Rare Plants Technical Data Report – Port au Port Wind Farm (Appendix 2-C of this EIS Amendment). Results and data will be provided to the Newfoundland and Labrador Department of Fisheries, Forestry and Agriculture - Wildlife Division.
Supporting Documentation	Appendix 2-C Land Cover Classification and Rare Plants Technical Data Report – Port au Port Wind Farm

Response to FFA 49

Comment ID:	FFA 49
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	General
Reviewer’s Comment:	Table 12.9 – What is meant by ‘community condition’? Clarify abundance, composition, distribution, etc. of community types? How would this be qualitatively assessed?
Response:	<p>The condition of a community refers to its quality as it relates to aspects of composition, including diversity, presence of invasive species and disturbance. For the Environmental Impact Statement (EIS), community condition was evaluated at the land cover level. Stantec has developed a land cover classification (LCC) for the Port au Port Peninsula Local Assessment Area (LAA) based on Object Based Image Analysis (OBIA). Vegetation communities exist at a finer scale than is mappable with available information; thus, LCC is used instead of vegetation communities for the purposes of this assessment.</p> <p>Potential Project effects to land cover condition are discussed in the EIS in Chapter 12, Section 12.5.1 (Wetlands and Vegetation, including Rare Plants, Residual Change in Community Diversity). Effects are expected to consist of edge effects, including changes in abiotic factors, introduction of invasive species, dust deposition, and reduction of plant productivity or overall fitness.</p> <p>Land cover mapping for the Port au Port Peninsula was field evaluated in 2023. Mapping for this area has been revised and land cover condition further evaluated following field survey. The results of the Port au Port surveys are provided in Land Cover Classification and Rare Plants Technical Data Report – Port au Port Wind Farm (Appendix 2-C).</p>
Supporting Documentation	Appendix 2-C, Land Cover Classification and Rare Plants Technical Data Report – Port au Port Wind Farm

Response to FFA 50

Comment ID:	FFA 50
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	General
Reviewer's Comment:	Page 12.32 - Transportation of Resources and Equipment – this section should include potential of transportation to enhance the frequency of hybridization for SAR species Lindley's Aster
Response:	<p>Please consider the cited text in Section 12.3.3 of the Environmental Impact Statement (EIS) revised to read:</p> <p>“Transportation of Resources and Equipment during construction could affect community diversity and species diversity indirectly due to potential effects of dust on vegetation adjacent access roads, potential introduction and spread of non-native invasive plants, and potential to enhance the frequency of hybridization for the species at risk (SAR) Lindley's aster by expanding the distribution of New York Aster within the Local Assessment Area. Vehicle movement will generate dust and vehicles may act as a vector for exotic and invasive species to enter vegetation communities where they previously did not exist.”</p> <p>Hybridization potential was discussed in the EIS as a potential outcome of transportation of resources and equipment, in Section 12.5.2.1 (Residual Change in Species Diversity), following the discussion of the potential introduction of invasive or exotic plants.</p> <p>Hybridization potential was also discussed in Section 12.6, Determination of Significance.</p>
Supporting Documentation	None

Response to FFA 51

Comment ID:	FFA 51
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	General
Reviewer’s Comment:	Page 12.34 Section 12.3.5.1 – Additional assumptions that are being made throughout include: past records represent comprehensive list of plants; that occurrences are proportional to population size/level of impact; that no new areas will be added
Response:	<p>The Environmental Impact Statement (EIS), Chapter 12 (Wetlands and Vegetation, including Rare Plants), does not assume past records of plant species, including species of conservation concern (SOCC) or species at risk (SAR), represent a comprehensive list of plants; that occurrences are proportional to population size/level of impact; or that there are no additional occurrences undocumented in available Atlantic Canada Conservation Data Centre (AC CDC) or other publicly available sources. Available habitat information was used in combination with available occurrence information to evaluate potential effects. WEGH2 acknowledges that AC CDC data does not reflect a comprehensive species list within the Project assessment areas; occurrences are not likely proportional to the population size or level of impact and that additional undocumented SOCC and possibly SAR occurrences are present in the Project assessment areas. The available data reflects past efforts for various purposes and was not intended to represent the locations of SAR and SOCC across the breadth of the Project, but rather as an indication of some locations of the known species.</p> <p>Project specific vegetation surveys were conducted in 2023 on the Port au Port Peninsula. The results of the Port au Port vegetation surveys are provided in Land Cover Classification and Rare Plants Technical Data Report – Port au Port Wind Farm (Appendix 2-C). Baseline field data collection is planned in the Codroy area during 2024, along with continued baseline data collection on the Port au Port Peninsula where required. Reports detailing data collection methods, results and additional mitigation measures will be provided to regulators prior to Project construction, either as a standalone submission or as part of developing the required mitigation and monitoring plans (e.g., Species at Risk Impacts Mitigation and Monitoring Plan). WEGH2 will engage Newfoundland and Labrador Department of Fisheries, Forestry and Agriculture (NLDFFA-Wildlife Division) in the development of the required Species at Risk Impacts Mitigation and Monitoring Plans.</p>
Supporting Documentation	Appendix 2-C, Land Cover Classification and Rare Plants Technical Data Report – Port au Port Wind Farm

Response to FFA 52

Comment ID:	FFA 52
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	General
Reviewer’s Comment:	<p>Table 12.11 – these need to be addressed during the SAR-IMMP process</p> <ul style="list-style-type: none"> • Control #4 – This control should also apply to decommissioning stage, which is also likely to include intensive activities at the sites • Control #42 – Use of native plants for landscaping must be committed to in more detail; considering the scale of the project, a plan for sourcing material is requested • Control #43 – Proponent must consider that moving vehicles amongst various worksites can also be detrimental to SAR species in undisturbed sites if these vehicles come from sites occupied by invasive plants. • Control #45 – This mitigation measure should also apply to decommissioning stage, as it is possible that SAR/SOCC could establish in new areas throughout the course of the project, and should be then avoided during decommissioning activities • Control #322 – Also applies to decommissioning phase • Control #358 – ‘increased understanding and confidence’ must be in place prior to commencement of the project; It must be clearly stated at what point it is no longer ‘possible’ to adjust the construction footprint so that appropriate expectations of the effectiveness of micro- siting can be set. • Control #362 is in conflict with Control #324 – Statement on the use of herbicides (‘not used within 300 m of plant SAR of SOCC’) is in conflict with Control #324 (use of herbicide treatment for New York Aster; these are very likely to occur within 300 m of Lindley’s Aster)
Response:	Noted, thank you. These comments will be addressed during development of the Species at Risk Impacts Mitigation and Monitoring Plan.
Supporting Documentation	None

Response to FFA 53

Comment ID:	FFA 53
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	General
Reviewer’s Comment:	<p>(a) Page 12.42 – Clarify the use of ‘where possible’ regarding application of project micro-siting.</p> <p>(b) Page 12.42 - In what way would mitigations further the recovery goals of the Limestone Barrens Species at Risk Recovery Plan? Examples should be provided or statement removed.</p> <p>(c) Information provided in the EIS is insufficient to determine the effectiveness of micro-siting.</p>
Response:	<p>(a) “Where possible” with respect to Project micro-siting can be replaced with the term “where technically feasible” which refers to the limits of constructability related to aspects of the environment such as slope and bedrock stability. These construction considerations are currently being analyzed.</p> <p>(b) WEGH2 will discuss mitigation for limestone barrens loss during the development of the SAR IMMPP with the Newfoundland and Labrador Department of Fisheries, Forestry and Agriculture (NLDFFA) - Wildlife Division that may further the goals of the Limestone Barrens Species at Risk Recovery Plan.</p> <p>(c) The results of the Port au Port vegetation surveys are provided in the Land Cover Classification and Rare Plants Technical Data Report – Port au Port Wind Farm (Appendix 2-C).</p> <p>Given the phased approach to construction, baseline data collection to date has focused on the Port au Port Peninsula, since it will be the first wind farm to be constructed. Baseline field data collection is planned in the Codroy area during 2024, along with continued baseline data collection on the Port au Port Peninsula where required. Reports detailing data collection methods, results and additional mitigation measures will be provided to regulators prior to Project construction, either as a standalone submission or as part of developing the required mitigation and monitoring plans (e.g., Species at Risk Impacts Mitigation and Monitoring Plan). WEGH2 will engage NLDFFA-Wildlife Division in the development of the required Species at Risk Impacts Mitigation and Monitoring Plans.</p>
Supporting Documentation	Appendix 2-C, Land Cover Classification and Rare Plants Technical Data Report – Port au Port Wind Farm.

Response to FFA 54

Comment ID:	FFA 54
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	General
Reviewer’s Comment:	<p>(a) Page 12.45 – It is noted that non-native plants will primarily establish in ‘disturbed areas and roadside ditches’; however, it should be acknowledged that this makes up a significant portion of the total project area (e.g., all areas disturbed for access, construction, road building)</p> <p>(b) Page 12.45 – ‘Barrens’ are diverse and composed of different types of native plant communities; it is not appropriate to group these together, and some types will be more vulnerable to project activities than others.</p> <p>(c) Page 12.47 – Regarding indirect effects from project operations and maintenance: effects should not be labelled ‘reversible’ if, as stated, ‘changes in plant composition may persist and differ from existing conditions in established communities’</p>
Response:	<p>(a) Please consider the cited text on page 12.45 of the Environmental Impact Statement (EIS) revised to read: “...as the majority of non-native plants are likely to become established in disturbed areas and roadside ditches. However, it is noted that disturbed areas and roadside ditches will exist throughout the Project Area. The Project Area will be actively managed to control non-native plants.”</p> <p>(b) It is acknowledged that barrens are an ecosystem supporting multiple plant communities. A land cover classification (LCC) for the Local Assessment Area (LAA) has been developed based on Object Based Image Analysis (OBIA). Vegetation communities exist at a finer scale than is mappable with available information; thus, LCC is used instead of vegetation communities. Analyses described in Land Cover Classification and Rare Plants Technical Data Report – Port au Port Wind Farm (Appendix 2-C) provide detail on rare vascular plant species occurrences in association with LCC units. Benefits of additional refined mapping of barrens, separating community types, will be evaluated and discussed with the NLDDFA-Wildlife Division. WEGH2 will also work with the NLDDFA-Wildlife Division to develop the SAR IMMP and any additional mitigation measures to address concerns of impacts to this land cover type.</p> <p>(c) Though some changes in plant composition are expected, the effects of the Project on the persistence of Species at Risk (SAR) and Species of Conservation Concern (SOCC) are considered reversible, as due to the number of observed occurrences within and outside of Project component footprints, through Project micro-siting and other mitigation measures, Project effects are not expected to impede the survival of these species in the LAA. Effects to the overall community composition are considered reversible because of the relatively low relative amounts of the LCC types within the LAA that will be directly or indirectly affected by the Project.</p>
Supporting Documentation	Appendix 2-C, Land Cover Classification and Rare Plants Technical Data Report – Port au Port Wind Farm

Response to FFA 55

Comment ID:	FFA 55
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	General
Reviewer’s Comment:	Page 12.49 / Section 12.5.2 – It is critical to note here that any quantitative or qualitative assessments about changes in species diversity are not informed by vegetation surveys associated with the project; therefore, any evaluations do not reflect the complete suite of species that will be impacted.
Response:	<p>Based upon a thorough review of the Environmental Impact Statement (EIS) Guidelines and regulatory consultations, WEGH2 determined that field-collected baseline data were not required for inclusion in the EIS (see EIS Guidelines Section 4.3 -Baseline Studies). The results of the Port au Port vegetation surveys are provided in the Land Cover Classification and Rare Plants Technical Data Report – Port au Port Wind Farm (Appendix 2-C).</p> <p>Given the phased approach to construction, baseline data collection to date has focused on the Port au Port Peninsula, since it will be the first wind farm to be constructed. Baseline field data collection is planned in the Codroy area during 2024, along with continued baseline data collection on the Port au Port Peninsula, where required. Reports detailing data collection methods, results and additional mitigation measures will be provided to regulators prior to Project construction, either as a standalone submission or as part of developing the required mitigation and monitoring plans (e.g., Species at Risk Impacts Mitigation and Monitoring Plan). WEGH2 will engage Newfoundland and Labrador Department of Fisheries, Forestry and Agriculture (NLDDFA-Wildlife Division) in the development of the required Species at Risk Impacts Mitigation and Monitoring Plans.</p>
Supporting Documentation	Appendix 2-C, Land Cover Classification and Rare Plants Technical Data Report – Port au Port Wind Farm

Response to FFA 56

Comment ID:	FFA 56
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	General
Reviewer’s Comment:	<p>(a) Page 12.51 – Regarding overlap of road and transmission lines with Low Northern Rockcress on Table Mountain – Please note that provincially- identified Critical Habitat for Low Northern Rockcress was submitted by the Limestone Barrens Species at Risk Recovery Team in August 2023.</p> <p>(b) Page 12.51 – The historical record of Rock Dwelling Sedge on the Port au Port may be outside the mapped boundaries. However, it is likely, based on the description that its occurrence was in the project area.</p> <p>(c) Page 12.51 – ‘Of the 480 known records of Lindley’s aster, 9, approximately 2% are within the Project footprint’ – As no new occurrence data has been collected for the project, and previous records and represent anywhere from 1 to 1000+ individuals, a value of 2% overlap is not representative/accurate of the impact to the species. There is a very high likelihood that many more individuals overlap the project area than have been noted in past surveys (which were are not comprehensive to the project area).</p>
Response:	<p>(a) Noted. Thank you. WEGH2 received data providing the critical habitat for the noted species immediately prior to submitting this Amendment. WEGH2 will review the data, work with NLDDFA – Wildlife Division, and it will be considered during final Project design.</p> <p>(b) Noted. Thank you.</p> <p>(c) Noted. Thank you. It is understood that a 2% overlap in the number of known occurrences of Lindley’s aster is not equivalent to a 2% loss in number of individuals due to the limited survey effort recorded within the Local Assessment Area (LAA).</p> <p>As indicated in the EIS, WEGH2 is committed to and is in the process of conducting the site-specific environmental field programs identified in the EIS Guidelines and further defined through consultation with regulators prior to Project construction. The results of the Port au Port vegetation surveys are provided in the Land Cover Classification and Rare Plants Technical Data Report – Port au Port Wind Farm (Appendix 2-C).</p> <p>Given the phased approach to construction, baseline data collection to date has focused on the Port au Port Peninsula, since it will be the first wind farm to be constructed. Baseline field data collection is planned in the Codroy area during 2024, along with continued baseline data collection on the Port au Port Peninsula, where required. Reports detailing data collection methods, results and additional mitigation measures will be provided to regulators prior to Project construction, either as a standalone submission or as part of developing the required mitigation and monitoring plans (e.g., Species at Risk Impacts Mitigation and Monitoring Plan). WEGH2 will engage with NLDDFA-Wildlife Division in the development of the required Species at Risk Impacts Mitigation and Monitoring Plans.</p>

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Comment ID:	FFA 56
Supporting Documentation	Appendix 2-C, Land Cover Classification and Rare Plants Technical Data Report – Port au Port Wind Farm

Response to FFA 57

Comment ID:	FFA 57
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	General
Reviewer’s Comment:	<p>Page 12.52:</p> <p>(a) Tradescant’s Aster – Stated that there area 20 known records – even though there has been no survey effort across the footprint of the proposed Codroy wind farm.</p> <p>(b) Statement on slender-leaved sundew: “this species is likely more common than the AC CDC data suggest” – what is this based on? Please provide rationale, citation, or remove statement. The AC CDC database does not represents systematically collected survey data, so in general, all SOCC or SAR species could have a different commonality than suggested by AC CDC database. This is why comprehensive surveys are requested as part of the EIS.</p> <p>(c) Lindley’s Aster: “it will not be possible to avoid all known instances of rare plant species, particular Lindley’s aster ...”- impacts must be evaluated based on actual instances of rare plant locations, as opposed to previously known instances of rare plants</p> <p>(d) Page 12.53 – Lindley’s Aster also expected to spread along the newly created roadsides and transmission corridors, likely bringing the two species into further contact</p>
Response:	<p>(a) The 20 occurrences of Tradescant’s aster are from available Atlantic Canada Conservation Data Centre (AC CDC) information. WEGH2 recognizes the available AC CDC data does not represent a comprehensive inventory of Tradescant’s aster occurrences. As indicated in the Environmental Impact Statement (EIS), WEGH2 is committed to and is in the process of conducting the site-specific environmental field programs identified in the EIS Guidelines and further defined through consultation with regulators prior to Project construction. The results of the Port au Port vegetation surveys, including further evaluation of rare plant occurrences, are provided in the Land Cover Classification and Rare Plants Technical Data Report – Port au Port Wind Farm (Appendix 2-C of this EIS Amendment).</p> <p>(b) Please consider this statement removed from the EIS. The distribution of this species within the Project Area is discussed in Land Cover Classification and Rare Plants Technical Data Report – Port au Port Wind Farm (Appendix 2-C of this EIS Amendment).</p>

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	<p>(c) Lindley’s Aster distribution within the Project Area is discussed in Land Cover Classification and Rare Plants Technical Data Report – Port au Port Wind Farm (Appendix 2-C of this EIS Amendment).</p> <p>(d) Noted. Mitigation measures to reduce the spread of New York aster are discussed in Section 12.4 (Mitigation Measures) and Section 12.5.2 (Residual Change in Species Diversity) of the EIS and monitoring to evaluate the effectiveness of these measures is recommended in Section 12.5.2 of the EIS (Residual Change in Species Diversity). WEGH2 will engage Newfoundland and Labrador Department of Fisheries, Forestry and Agriculture - Wildlife Division in the development of the required Species at Risk Impacts Mitigation and Monitoring Plans.</p>
Supporting Documentation	Appendix 2-C, Land Cover Classification and Rare Plants Technical Data Report – Port au Port Wind Farm

Response to FFA 58

Comment ID:	FFA 58
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	General
Reviewer’s Comment:	<p>Page 12.54 –</p> <p>“... the Project is expected to result in the loss of plant SAR and SOCC such that those species may no longer be sustainable within the RAA. As such, effects of Project construction on vegetation species diversity are expected to be adverse and high in magnitude.”</p> <ul style="list-style-type: none"> Note that this statement is directly at odds with the legislative requirements for a Section 19 permit, which state that a project not impede the recovery or survival of a species. <p>“...Because the specific requirements for rehabilitation of many of the plant SAR and SOCC are not well understood, the effects are considered irreversible.”</p> <ul style="list-style-type: none"> Rather than accepting the lack of available information, early planning should be done to develop strategies for testing rehabilitation strategies for identified species.

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Comment ID:	FFA 58
Response:	WEGH2 acknowledges loss of species at risk (SAR) is at odds with legislative requirements, specifically the legislative requirements of a Section 19 permit. Mitigation has been proposed to reduce potential loss of SAR by the Project; however, in the absence of field data supporting a more comprehensive evaluation of SAR presence, extent, and abundance in the Project assessment areas, loss was conservatively assumed. Field work to further evaluate the presence, extent and abundance of SAR in the Local Assessment Area was conducted in 2023 after submission of the Environmental Impact Statement (EIS). Survey results are available in the Land Cover Classification and Rare Plants Technical Data Report – Port au Port Wind Farm (Appendix 2-C of this EIS Amendment). Field work identified 350 additional SAR occurrences of Lindley’s aster (<i>Symphotrichum ciliolatum</i>) within the Project Area. The Project will likely result in the loss of some of the observed Lindley’s aster occurrences and habitat conditions may be altered; however, with the observed number of occurrences, Project micro-siting and other mitigation measures, Project effects are not expected to impede the survival of the species. Additional mitigation measures and rehabilitation strategies for affected SAR will be discussed with the Newfoundland and Labrador Department of Fisheries, Forestry and Agriculture - Wildlife Division during the development of the SAR IMMP.
Supporting Documentation	None

Response to FFA 59

Comment ID:	FFA 59
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	General
Reviewer’s Comment:	<p>Page 12.63 – “Most wetlands are not expected to return to pre-project conditions and functions may not return for many decades”</p> <ul style="list-style-type: none"> Active restoration/rehabilitation measures should be developed to restore wetland function, rather than accepting this as an outcome of the project. There is abundant research available on post-development wetland restoration from other parts of Canada, and this information could be used to develop an effective restoration plan.
Response:	Although wetland rehabilitation measures may occur, many wetlands on the site contain woody vegetation and/or peat layers and associated functions that have developed over decades to millennia that will not be possible to restore in the short term. Therefore, this statement remains as written. Mitigation measures in Table 12.11 of the Environmental Impact Statement (EIS) will help reduce effects to wetlands, but full avoidance is not anticipated due to wetland abundance and extent. WEGH2 will work with the Newfoundland and Labrador Department of Fisheries, Forestry and Agriculture -Wildlife Division to identify additional

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	technically feasible mitigation measures to reduce effects and promote post-disturbance wetland function recovery.
Supporting Documentation	None

Response to FFA 60

Comment ID:	FFA 60
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	General
Reviewer’s Comment:	Page 12.68 – Confidence about the significance of the project for wetlands and vegetation is stated as ‘low’ due to insufficient information having been collected at the time of the EIS submission. Especially considering that large footprint of the project and stated inability to rehabilitate certain habitat types, this should be addressed before the project proceeds.
Response:	<p>Based upon a thorough review of the Environmental Impact Statement (EIS) Guidelines and regulatory consultations, WEGH2 determined that field-collected baseline data were not required for inclusion in the EIS (see EIS Guidelines Section 4.3 -Baseline Studies). As indicated in the EIS, WEGH2 is committed to and is in the process of conducting the site-specific environmental field programs identified in the EIS Guidelines and further defined through consultation with regulators prior to Project construction. The results of the Port au Port vegetation surveys are provided in the Land Cover Classification and Rare Plants Technical Data Report – Port au Port Wind Farm (Appendix 2-C).</p> <p>Given the phased approach to construction, baseline data collection to date has focused on the Port au Port Peninsula, since it will be the first wind farm to be constructed. Baseline field data collection is planned in the Codroy area during 2024, along with continued baseline data collection on the Port au Port Peninsula, where required. Reports detailing data collection methods, results and additional mitigation measures will be provided to regulators prior to Project construction, either as a standalone submission or as part of developing the required mitigation and monitoring plans (e.g., Species at Risk Impacts Mitigation and Monitoring Plan). WEGH2 will engage Newfoundland and Labrador Department of Fisheries, Forestry and Agriculture (NLDFFA-Wildlife Division) in the development of the required Species at Risk Impacts Mitigation and Monitoring Plans.</p>
Supporting Documentation	Appendix 2-C, Land Cover Classification and Rare Plants Technical Data Report – Port au Port Wind Farm

Response to FFA 61

Comment ID:	FFA 61
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	General
Reviewer’s Comment:	Other – <ul style="list-style-type: none"> Pending the results of surveys along transmission line routes and access roads, mitigation plans may have to be developed for Black Ash, a Threatened species. This applies to the ‘connector’ area between the two wind farms and infrastructure around St. George’s.
Response:	Noted. Thank you. Surveys in these areas are planned for 2024.
Supporting Documentation	None

Response to FFA 62

Comment ID:	FFA 62
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	General
Reviewer’s Comment:	(a) Table 16.2 – Note that Black Ash also occur within and around Barachois Pond Provincial Park (threatened status) and that the species has moderate to high probability to occur more broadly in this area. Table 16.4 – Black Ash also occur within and around Barachois Brook (b) Page 16.19 – “There are no designated critical habitat areas within or intersecting the AoCC LAA/RAA. There are three proposed critical habitats described below.” <ul style="list-style-type: none"> Note that proposed critical habitat was submitted in August 2023 for: Low Northern Rockcress, Wooly Arnica, Mackenzie’s Sweetvetch
Response:	(a) Noted. Thank you. (b) Noted. Thank you. WEGH2 received data providing the critical habitat for the noted species immediately prior to submitting this Amendment. WEGH2 will review the data, work with NLDDFA – Wildlife Division, and it will be considered during final Project design.
Supporting Documentation	None

Response to FFA 63

Comment ID:	FFA 63
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	General
Reviewer’s Comment:	<p>Table 16.2 – Note that Black Ash also occur within and around Barachois Pond Provincial Park (threatened status) and that the species has moderate to high probability to occur more broadly in this area.</p> <p>Table 16.4 – Black Ash also occur within and around Barachois Brook</p> <p>Page 16.19 – “There are no designated critical habitat areas within or intersecting the AoCC LAA/RAA. There are three proposed critical habitats described below.”</p> <ul style="list-style-type: none"> Note that proposed critical habitat was submitted in August 2023 for: Low Northern Rockcress, Woolly Arnica, Mackenzie’s Sweetvetch
Response:	See response FFA 62 above.
Supporting Documentation	None

Response to FFA 64

Comment ID:	FFA 64
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	General
Reviewer’s Comment:	The NLDDFA Land use inventory is not sufficiently detailed to capture nuanced, and important, differences in habitat types that are relevant to the EIS. The intended purpose of the inventory is to provide stand-level information about forest types, and therefore does not necessarily include important details about non-forest environments.
Response:	<p>Noted. Thank you. The Newfoundland and Labrador Department of Fisheries, Forestry and Agriculture (NLDDFA) land use inventory was used because WEGH2’s land cover classification (LCC) analysis was not complete at the time of writing of the Environmental Impact Statement (EIS).</p> <p>The results of the Port au Port vegetation surveys are provided in the Land Cover Classification and Rare Plants Technical Data Report – Port au Port Wind Farm (Appendix 2-C of this EIS Amendment).</p> <p>Given the phased approach to construction, baseline data collection to date has focused on the Port au Port Peninsula, since it will be the first wind farm to be constructed. Baseline field data collection is planned in the Codroy area during 2024, along with continued baseline data collection on the Port au Port Peninsula,</p>

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	where required. Reports detailing data collection methods, results and additional mitigation measures will be provided to regulators prior to Project construction, either as a standalone submission or as part of developing the required mitigation and monitoring plans (e.g., Species at Risk Impacts Mitigation and Monitoring Plan). WEGH2 will engage NLDDFA-Wildlife Division in the development of the required Species at Risk Impacts Mitigation and Monitoring Plans.
Supporting Documentation	Appendix 2-C, Land Cover Classification and Rare Plants Technical Data Report – Port au Port Wind Farm

Response to FFA 65

Comment ID:	FFA 65
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	General
Reviewer’s Comment:	Table 3.1 – Unclear why a similar table is not provided for provincially listed species.
Response:	The federally listed plant species that occur in Newfoundland and Labrador are provided in Table 3.1 of the Environmental Impact Statement (EIS), however are not discussed further in the EIS as they are unlikely to occur in the Regional Assessment Area (RAA) (with the exception of some lichens). Provincially listed plant species that are likely to occur in the RAA are listed and discussed in Section 3.3.2.1 of the EIS. Species Of Conservation Concern and Species At Risk (SAR) observed in the Project Area during 2023, and in subsequent field surveys, will be reported in forthcoming reports, including Land Cover Classification and Rare Plants Technical Data Report – Port au Port Wind Farm (Appendix 2-C of this EIS Amendment) and SAR Impacts Mitigation and Monitoring Plan.
Supporting Documentation	Appendix 2-C, Land Cover Classification and Rare Plants Technical Data Report – Port au Port Wind Farm

Response to FFA 66

Comment ID:	FFA 66
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	General
Reviewer’s Comment:	Page 3.5 – ‘Results’ of the Object Based Image Analysis are shown in a table in Chapter 12 for two subregions; but here it is stated that the analysis is incomplete across the project area and requires field validations. This, at minimum, should be incorporated into the EIS in the absence of survey data.
Response:	<p>The results of the Port au Port vegetation surveys are provided in the Land Cover Classification and Rare Plants Technical Data Report – Port au Port Wind Farm (Appendix 2-C of this EIS Amendment).</p> <p>Given the phased approach to construction, baseline data collection to date has focused on the Port au Port Peninsula, since it will be the first wind farm to be constructed. Baseline field data collection is planned in the Codroy area during 2024, along with continued baseline data collection on the Port au Port Peninsula, where required. Reports detailing data collection methods, results and additional mitigation measures will be provided to regulators prior to Project construction, either as a standalone submission or as part of developing the required mitigation and monitoring plans (e.g., Species at Risk Impacts Mitigation and Monitoring Plan). WEGH2 will engage Newfoundland and Labrador Department of Fisheries, Forestry and Agriculture (NLDFFA-Wildlife Division) in the development of the required Species at Risk Impacts Mitigation and Monitoring Plans.</p>
Supporting Documentation	Appendix 2-C, Land Cover Classification and Rare Plants Technical Data Report – Port au Port Wind Farm

Response to FFA 67

Comment ID:	FFA 67
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	General
Reviewer’s Comment:	Page 3-10 – The main limestone barrens areas in the Port au Port area are discussed, but there are also many smaller areas of ‘undisturbed’ barrens that have not been searched for plant SAR/SOCC due to access issues
Response:	<p>Surveys of limestone barrens and other undisturbed barren areas were conducted as part of the 2023 Project field survey program. The results of the Port au Port vegetation surveys are provided in the Land Cover Classification and Rare Plants Technical Data Report – Port au Port Wind Farm (Appendix 2-C of this EIS Amendment).</p> <p>Given the phased approach to construction, baseline data collection to date has focused on the Port au Port Peninsula, since it will be the first wind farm to be constructed. Baseline field data collection is planned in the Codroy area during 2024, along with continued baseline data collection on the Port au Port Peninsula, where required. Reports detailing data collection methods, results and additional mitigation measures will be provided to regulators prior to Project construction, either as a standalone submission or as part of developing the required mitigation and monitoring plans (e.g., Species at Risk Impacts Mitigation and Monitoring Plan). WEGH2 will engage Newfoundland and Labrador Department of Fisheries, Forestry and Agriculture (NLDDFA-Wildlife Division) in the development of the required Species at Risk Impacts Mitigation and Monitoring Plans.</p>
Supporting Documentation	Appendix 2-C, Land Cover Classification and Rare Plants Technical Data Report – Port au Port Wind Farm

Response to FFA 68

Comment ID:	FFA 68
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	General
Reviewer’s Comment:	<p>(a) Page 3-19 – “and black ash (<i>Fraxinus nigra</i>, listed as Threatened under COSEWIC but not listed under SARA or NLESA, discussed in greater detail in Section 3.3.2.2)”</p> <ul style="list-style-type: none"> • Factually incorrect, as discussed elsewhere in the document. Black Ash is listed as Threatened under the NLESA. <p>(b) Page 3-19 – <i>Pectinia plumbea</i> (syn. With <i>Degelia plumbea</i>) is also listed under the NLESA</p> <p>(c) Page 3-12 – “Four lichen species listed on Schedule 1 of SARA are known to occur in Newfoundland and Labrador: vole ears lichen (<i>Erioderma mollissimum</i>, Endangered); wrinkled shield lichen (<i>Pannaria lurida</i>, Threatened), blue felt lichen (<i>Degelia plumbea</i>, Special Concern), and boreal felt lichen (<i>Erioderma pedicellatum</i>, Special Concern). Of these, all but boreal felt lichen are considered to have reasonable potential to occur within the Project Area”</p> <ul style="list-style-type: none"> • This statement is incorrect, as described above in comments for Chapter 12. <p>(d) Table 3.5 – Clarify that data source for this table is AC CDC records, not contemporary surveys</p> <ul style="list-style-type: none"> • <i>Carex pretricensa</i> – historical record • <i>Ranunculus gmelinii</i> – incorrect, more recent records from Robinson’s River • <i>Symphotrichum ciliolatum</i> – historical records were misidentified • <i>Fraxinus nigra</i> – also Barachois Pond PP • <i>Pinus resinosa</i> – would be planted individuals
Response:	<p>(a) Consider the cited text on page 3-19 of the Environmental Impact Statement (EIS) revised to read: “...and black ash (<i>Fraxinus nigra</i>, listed as Threatened by the Committee on the Status of Endangered Wildlife in Canada and the <i>Newfoundland and Labrador Endangered Species Act</i>, however not listed under the federal <i>Species at Risk Act</i>, discussed in greater detail in Section 3.3.2.2 of the EIS.”</p> <p>(b) Consider the cited text on page 3-19 of the EIS revised to read: “Data on the distribution and importance of this subregion for lichen species is limited, but the federally and provincially Threatened blue felt lichen (<i>Pectinia plumbea</i>) has been documented in the Codroy Valley (AC CDC 2023; Lewis 2019).”</p> <p>(c) WEGH2 has asked for clarification on what aspect of this statement is factually incorrect, however has not received any additional information. No changes to this text are proposed.</p> <p>(d) Yes, the data source for Table 3.5 in the EIS is the Atlantic Canada Conservation Data Centre records.</p>
Supporting Documentation	None

Response to FFA 69

Comment ID:	FFA 69
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	General
Reviewer’s Comment:	<p>Page 3.23</p> <p>(a) Results of ‘recent field surveys’ have not been shared here as part of EIS document or elsewhere with WD.</p> <p>(b) Please also note a status reassessment for Low Northern Rockcross is available from 2016 (not cited in EIS document).</p>
Response:	<p>(a) The results of the Port au Port vegetation surveys are provided in the Land Cover Classification and Rare Plants Technical Data Report – Port au Port Wind Farm (Appendix 2-C of this EIS Amendment).</p> <p>Given the phased approach to construction, baseline data collection to date has focused on the Port au Port Peninsula, since it will be the first wind farm to be constructed. Baseline field data collection is planned in the Codroy area during 2024, along with continued baseline data collection on the Port au Port Peninsula, where required. Reports detailing data collection methods, results and additional mitigation measures will be provided to regulators prior to Project construction, either as a standalone submission or as part of developing the required mitigation and monitoring plans (e.g., Species at Risk Impacts Mitigation and Monitoring Plan). WEGH2 will engage Newfoundland and Labrador Department of Fisheries, Forestry and Agriculture (NLDDFA-Wildlife Division) in the development of the required Species at Risk Impacts Mitigation and Monitoring Plans.</p> <p>(b) Please consider this 2016 reassessment document to be used in addition to the 2005 document cited in the EIS. Please note that the Department of Fisheries, Forestry and Agriculture Species at Risk website links only to the 2004 status report.</p>
Supporting Documentation	Appendix 2-C, Land Cover Classification and Rare Plants Technical Data Report – Port au Port Wind Farm

Response to FFA 70

Comment ID:	FFA 70
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	General
Reviewer’s Comment:	Page 3.25 – It should be acknowledged that large differences in the count estimates represented by each occurrence. Project-specific surveys are needed to assess impacts to population size/number of individuals impacted.
Response:	<p>The Wetland and Vegetation assessment and supporting terrestrial baseline report within the Environmental Impact Statement (EIS) includes multiple references to occurrences and does not equate occurrences to number of individuals. The Atlantic Canada Conservation Data Centre (AC CDC) data used in the EIS did not consistently include number of individuals, and thus an analysis of that parameter was not possible.</p> <p>As indicated in the EIS, WEGH2 is committed to and is in the process of conducting the site-specific environmental field programs identified in the EIS Guidelines and further defined through consultation with regulators prior to Project construction. The results of the Port au Port vegetation surveys are provided in the Land Cover Classification and Rare Plants Technical Data Report – Port au Port Wind Farm (Appendix 2-C).</p> <p>Given the phased approach to construction, baseline data collection to date has focused on the Port au Port Peninsula, since it will be the first wind farm to be constructed. Baseline field data collection is planned in the Codroy area during 2024, along with continued baseline data collection on the Port au Port Peninsula, where required. Reports detailing data collection methods, results and additional mitigation measures will be provided to regulators prior to Project construction, either as a standalone submission or as part of developing the required mitigation and monitoring plans (e.g., Species at Risk Impacts Mitigation and Monitoring Plan). WEGH2 will engage with Newfoundland and Labrador Department of Fisheries, Forestry and Agriculture in the development of the required Species at Risk Impacts Mitigation and Monitoring Plans.</p>
Supporting Documentation	Appendix 2-C, Land Cover Classification and Rare Plants Technical Data Report – Port au Port Wind Farm

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Response to FFA 71

Comment ID:	FFA 71
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	General
Reviewer's Comment:	<p>Page 3.26</p> <ul style="list-style-type: none"> • Red Pine listed as Threatened in May 2022; the locations in Little Barachois Brook are likely planted individuals and therefore not protected under the ESA (note that for Red Pine ESA applies only to 'natural' population). • Black Ash – as acknowledged here, we are only in the beginning stages of comprehensive surveys for Black Ash. The proponent is responsible for surveying for the species within the proposed project area and developing a SAR IMMP if required.
Response:	Noted. Thank you. Additional surveys are planned for 2024.
Supporting Documentation	None

Response to FFA 72

Comment ID:	FFA 72
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	General
Reviewer's Comment:	<p>Page 3.27</p> <ul style="list-style-type: none"> • Updated status report available for <i>Erioderma mollisimum</i> – correct reference; Vole Ears Lichen is known as 'Graceful Felt Lichen' in NL • Note recent updated COSEWIC status for Dense Draba which, agreed, is very unlikely to occur in the project area.
Response:	<p>Although graceful felt lichen/vole ears lichen was reassessed by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC) in May 2021, the most recent federal assessment and status report available for this species was published in November 2009. Though the federal <i>Species at Risk Act</i> (SARA) website states the COSEWIC report date is 2010-09-03, this date is not when the report was published. The date in the actual report is November 2009, as referenced in the Terrestrial Environment Baseline Study (Appendix BSA3 of the Environmental Impact Statement).</p> <p>The 2022 COSEWIC status report for dense draba is referenced in the baseline report. No newer status report is available on the federal SARA website.</p>

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Comment ID:	FFA 72
Supporting Documentation	None

Response to FFA 73

Comment ID:	FFA 73
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	General
Reviewer's Comment:	Page 3.34 – Rock dwelling sedge also has a historical record from Port au Port, Garden Hills
Response:	Noted. Thank you.
Supporting Documentation	None

Response to FFA 74

Comment ID:	FFA 74
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	General
Reviewer's Comment:	The explanation of the NL Endangered Species Act is not quite correct and this is also repeated in many other sections of the EIS where the NL ESA is outlined. Most importantly, designation under the Act follows recommendations of the Species Status Advisory Committee and the national Committee on the Status of Endangered Wildlife in Canada (COSEWIC). Recommendations from either assessment body are treated equally under the NL ESA. Suggest removing: '...and referring concerns about the status of species to COSEWIC, where the species is of national importance' as this is one role of the Species Status Advisory Committee (not the ESA) and is not relevant to this discussion.
Response:	Consider the text in Sections 11.1.1 (Marine), 12.1.1 (Vegetation), 13.1.1 (Avifauna), 14.1.1 (Bats) and 15.1.1 (Other Wildlife) of the Environmental Impact Statement revised as follows: In Newfoundland and Labrador, species at risk are protected under the <i>Newfoundland and Labrador Endangered Species Act</i> . Designation under the Act follows the recommendation of the Species Status Advisory Committee and the national Committee on the Status of Endangered Wildlife in Canada (COSEWIC).
Supporting Documentation	None

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Response to FFA 75

Comment ID:	FFA 75
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	General
Reviewer’s Comment:	Add to the last sentence of the first paragraph, that there is a suspected hibernaculum somewhere near the area of Noels Pond and Stephenville Crossing, as multiple WNS-positive bats were found in this area in early spring and WNS-infected bats typically do not travel far when emerging prematurely from hibernacula. However, the location of this hibernaculum is unknown.
Response:	Consider the following text to have been added to the end of the paragraph noted above in the Environmental Impact Statement: There is a suspected hibernaculum somewhere near the area of Noels Pond and Stephenville Crossing, as multiple white-nose syndrome (WNS)-positive bats were found in this area in early spring and WNS-infected bats typically do not travel far when emerging prematurely from hibernacula. However, the location of this hibernaculum is unknown.
Supporting Documentation	None

Response to FFA 76

Comment ID:	FFA 76
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	General
Reviewer’s Comment:	White-nose syndrome was first confirmed on the Island of Newfoundland in the spring of 2017. (The 2016/17 from the US Fish and Wildlife Service refers to a detection of the Pd fungus but not the disease itself in bats).
Response:	This correction has been made. Consider the text in the Environmental Impact Statement to be revised as follows: White-nose syndrome was first confirmed on the Island of Newfoundland in the spring of 2017.
Supporting Documentation	None

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Response to FFA 77

Comment ID:	FFA 77
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	General
Reviewer’s Comment:	Please re-word the pers. comm. from J. Humber slightly. It is more accurate to say “In western Newfoundland, estimated population declines of Little Brown Myotis range from 94 to over 99%”. This change is necessary because we don’t have population estimates of Northern Myotis and because the range of estimates come from hibernating populations as well as summer maternity colony sites.
Response:	This correction is accepted. Consider the text in the Environmental Impact Statement to be revised as follows: In western Newfoundland, estimated population declines of little brown myotis range from 94 to over 99% (J. Humber, pers comm, December 8, 2022).
Supporting Documentation	None

Response to FFA 78

Comment ID:	FFA 78
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	General
Reviewer’s Comment:	Re: the sentence “Northern myotis was confirmed as occurring in the LAA, within the Port au Port wind farm, during the fall 2022 acoustic bat surveys.” In the bat report found in the Appendix 3, as well as in bat reports for future monitoring years, please provide information on how Northern Myotis calls were distinguished from Little Brown Myotis calls. Many bat experts do not agree that they can be confidently distinguished, and it may depend on how ‘cluttered’ the acoustic environment is. See McBurney and Segers 2020
Response:	Only one acoustic file was classified as <i>Myotis septentrionalis</i> in the 2022 dataset. This file had several pulses that had a max frequency > 100 kHz, with a maximum recorded frequency of approximately 108 kHz. The Kaleidoscope pro software classified this call as <i>M. septentrionalis</i> with an 80% match ratio. However, upon review of the McBurney and Segers (2020) document, in a high clutter environment, maximum frequency would have to be above 118 kHz to confirm a <i>M. septentrionalis</i> identification. As such, please consider the text in the Environmental Impact Statement (EIS) updated to state that the acoustic data

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	suggests that <i>M. septentrionalis</i> may occur, but presence could not be confirmed due to the difficulty in differentiating the echolocation calls of <i>Myotis</i> species.
Supporting Documentation	None

Response to FFA 79

Comment ID:	FFA 79
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	General
Reviewer's Comment:	One specimen of silver-haired bat was actually confirmed on the Avalon Peninsula in 2020
Response:	This correction is accepted. Consider the text to be revised in the Environmental Impact Statement to state that the silver-haired bat has been confirmed on the Avalon Peninsula in 2020.
Supporting Documentation	None

Response to FFA 80

Comment ID:	FFA 80
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	General
Reviewer's Comment:	Please reword the pers. comm. from J. Humber in the third paragraph on Eastern Red Bat for greater accuracy. It was not detected acoustically by NLDFFA-WD, but photographic records exist and there have been some confirmed sightings of the species on the island.
Response:	Consider the pers comm from J. Humber in the Environmental Impact Statement to be revised as follows: While there are no published records of this species on the Island of Newfoundland, eastern red bat has been confirmed on the Island through photographic records and sightings (J. Humber, personal communication, December 16, 2022).
Supporting Documentation	None

Response to FFA 81

Comment ID:	FFA 81
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	General
Reviewer's Comment:	Re: the first sentence under 'Habitat Assessment', other habitat types are preferred by bats for foraging, particularly agricultural areas, open fields, and forest clearings/edges/trails. What % of the habitat is comprised of these habitats (especially agriculture in the Codroy Valley)? It would also be of value to quantify the % of limestone/karst landscape.
Response:	<p>There is no readily available spatial data that provides the area for forest clearings/edges/trails on the Island of Newfoundland. However, information can be provided on agricultural areas, which would also include some open fields/pastures.</p> <p>Table FFA 81.1 (below) specifies the area of agriculture in the Project Area, LAA and RAA, and indicates what percentage will be lost. In total, 9.6 ha of agricultural land will be cleared for the Project, which represents 18.47% of agricultural land in the Project Area, 1.92% of agricultural land in the LAA and only 0.23% of agricultural land in the RAA.</p> <p>Table FFA 81.2 provides the breakdown of this agricultural land between the Project components. There is no agricultural land cover in the Codroy Wind Farm or at the hydrogen / ammonia plant. The majority of agriculture in the Project Area (43.78 ha) occurs where the transmission lines will be built.</p> <p>Limestone/karst landscapes have the potential to contain caves that are suitable hibernacula for resident bats. To quantify this, spatial data was summarized from the Generalised Bedrock Geology for Newfoundland layer (Newfoundland and Labrador Geological Survey 2013). Based on the 'Rock Type' attribute, two types of bedrock within the RAA may contain limestone/karst features, which are carbonate and limestone carbonate. The percentages of carbonate and limestone carbonate bedrock in the Project Area, LAA and RAA are summarized in Table FFA 81.3. A total of 29.8% of the Project Area, 28.36% of the LAA, and 12.19% of the RAA contain carbonate or limestone carbonate bedrock. The breakdown of these bedrock types by Project component is provided in Table FAA 81.4. The majority of carbonate and limestone carbonate bedrock is located on the Port au Port Wind Farm (8,301.14 ha).</p> <p>References</p> <p>Newfoundland and Labrador Geological Survey. "Detailed Bedrock Geology." Newfoundland and Labrador GeoScience Atlas OnLine. Last update: January 2013. https://geoatlas.gov.nl.ca/.</p>
Supporting Documentation	<p>Table FFA 81.1 Area of Agricultural Land Cover to be Lost in the Project Area, LAA and RAA</p> <p>Table FFA 81.2 Breakdown of Agricultural Area Across Project Components</p> <p>Table FFA 81.3 Bedrock Types containing Limestone and/or Karst Landscape</p> <p>Table FFA 81.4 Breakdown of Bedrock Types Containing Limestone and/or Karst Landscape Across Project Components</p>

Table FFA 81.1 Area of Agricultural Land Cover to be Lost in the Project Area, LAA and RAA

Habitat Class	Project Area			LAA		RAA	
	To be cleared (preferred)	Area in PA (ha)	% Habitat Lost	Area in LAA (ha)	% Habitat Lost	Area in RAA (ha)	% Habitat Lost
Agriculture	9.60	51.99	18.47	500.88	1.92	4225.18	0.23

Table FFA 81.2 Breakdown of Agricultural Area Across Project Components

Habitat Class	Area per Project Component (ha)			
	Codroy Wind Farm	Port au Port Wind Farm	Hydrogen/ Ammonia Plant	Transmission Line
Agriculture	0.00	10.03	0	43.78

Table FFA 81.3 Bedrock Types containing Limestone and/or Karst Landscape

Bedrock Type	Area (ha) in Project Area	% of Project Area	Area (ha) in LAA	% of LAA	Area (ha) in RAA	% of RAA
Carbonate	6,715.64	24.10	16,065.97	21.29	29,798.39	8.96
Carbonate Limestone	1,585.51	5.69	5,337.48	7.07	10,725.09	3.23
Total	8,301.14	29.80	21,403.45	28.36	40,523.48	12.19

Table FFA 81.4 Breakdown of Bedrock Types Containing Limestone and/or Karst Landscape Across Project Components

Bedrock Type	Area per Project Component (ha)		
	Codroy Wind Farm	Port au Port Wind Farm	Transmission Line
Carbonate	0.00	6,494.06	696.04
Limestone Carbonate	0.00	1,541.65	131.71
Total	0.00	8,035.71	827.75

Response to FFA 82

Comment ID:	FFA 82
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	General
Reviewer's Comment:	Re: use of forest height as the determinant of forest suitability. Tree girth (i.e. diameter at breast height, DBH) would be a better predictor than forest height. Is there DBH data for these forests ?
Response:	There is no publicly available diameter at breast height (DBH) data available for Newfoundland and Labrador. For this reason, tree height was used as a proxy of DBH to estimate forest suitability.
Supporting Documentation	None

Response to FFA 83

Comment ID:	FFA 83
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	General
Reviewer's Comment:	Suggest changing 'suitable bat habitat' to 'preferred bat habitat' because many other habitat types are suitable and used by bats, but you are focusing on some habitats of primary importance.
Response:	This correction is accepted. Please consider 'suitable bat habitat' to have been revised to read 'preferred bat habitat' in Section 14.2.2.7 and in the title of Table 14.1 of the Environmental Impact Statement.
Supporting Documentation	None

Response to FFA 84

Comment ID:	FFA 84
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	General
Reviewer’s Comment:	Some literature exists on impacts of transmission lines to bat mortality
Response:	<p>Please consider Table 14.4 in the Environmental Impact Statement (EIS) to have been revised to include a check mark for effect 2 (change in mortality) under Operation and Maintenance - Presence, Operation, and Maintenance of Transmission Lines and Substations.</p> <p>It is possible that bat mortality may occur through collisions with transmission lines. In other locations in North America, bats have been found incidentally during bird mortality searches at transmission lines (Manville 2015). However, these collisions are expected to occur infrequently, since bats can readily detect transmission lines through echolocation. One study on the collision of bats with stationary objects suggests that bats collide more often with stationary objects in the light than in the dark (e.g., when objects are illuminated). This may be because bats rely solely on echolocation in the dark, but use a combination of echolocation and visual cues in the light, and visual cues may not be as good at picking up objects like transmission lines (Orbach and Fenton 2010). Generally, the transmission lines for this Project are not expected to be illuminated.</p> <p>In addition, most transmission lines being erected for this Project will twin existing transmission lines. Of the 156 km of 230 kv line being constructed for the Project, 98.5 km (63%) twin existing transmission lines. Since transmission lines already occur in the Project Area, twinning these features does not result in a new obstacle for bats.</p> <p>References</p> <p>Manville II, A. M. 2015. Impacts to Birds and Bats Due to Collisions and Electrocutions from Some Tall Structures in the United States: Wires, Towers, Turbines, and Solar Arrays – State of the Art in Addressing the Problems. In: Angelici, F. (eds.) Problematic Wildlife, 415-442. Springer, Cham. doi: 10.1007/978-3-319-22246-2_20</p> <p>Orbach, D.N. and Fenton, B., 2010. Vision impairs the abilities of bats to avoid colliding with stationary obstacles. <i>PLoS One</i>, 5(11), p.e13912.</p>
Supporting Documentation	None

Response to FFA 85

Comment ID:	FFA 85
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	General
Reviewer’s Comment:	Re: first bullet, refer to ‘preferred habitat’ instead of suitable habitat, and it perhaps may not be conservative where some important habitat categories for foraging (e.g. agriculture, fields) were not included.
Response:	Please consider ‘suitable bat habitat’ to have been revised to read ‘preferred bat habitat’ in Section 14.3.5.1 of the Environmental Impact Statement.
Supporting Documentation	None

Response to FFA 86

Comment ID:	FFA 86
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	General
Reviewer’s Comment:	A mitigation measure should be added to avoid removal of trees until after the bat active season wherever possible (as required for avifauna), and any large diameter trees (>25 cm Diameter at Breast Height) must be inspected for bat use visually and through emergence counts prior to their removal.
Response:	WEGH2 is committed to developing site-specific mitigation and monitoring plans, including the Species at Risk (SAR) Impacts Mitigation and Monitoring Plan (IMMP) prior to Project construction at that site. The SAR IMMP will incorporate mitigation measures and monitoring commitments in the Environmental Impact Statement (EIS) and this EIS Amendment, will reflect applicable conditions of release from the environmental assessment process and will include information on how and when updates to the plans will be made. WEGH2 will consult with NLDDFA-Wildlife Division on the noted mitigation measure as part of development of the SAR IMMP to be submitted for review prior to Project construction at that site. WEGH2 is committed to an adaptive management approach, and as such, these plans are considered “living” documents that will be updated as applicable to capture Project design updates and results of ongoing environmental monitoring.
Supporting Documentation	None

Response to FFA 87

Comment ID:	FFA 87
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	General
Reviewer’s Comment:	Just a note that some curtailment at low wind speeds will be important from project initiation onwards and this reflects past discussions and draft provincial BMPs, so suggest instead of using ‘may’ to make the commitment with ‘will include locking or feathering the turbine blades...’.
Response:	WEGH2 acknowledges this request and will further consult with Newfoundland and Labrador Department of Fisheries, Forestry and Agriculture (NLDDFA)-Wildlife Division during development of the Species at Risk Impacts Mitigation and Monitoring Plan (SAR IMMP). WEGH2 is committed to working with NLDDFA-Wildlife Division to confirm site-specific mitigation and monitoring plans for bats. The SAR IMMP will be developed prior to Project construction at that site, will incorporate mitigation measures and monitoring commitments in the Environmental Impact Statement (EIS) and this EIS Amendment, will reflect applicable conditions of release from the environmental assessment process and will include information on how and when updates to the plans will be made. As indicated, the SAR IMMP will be developed in consultation with NLDDFA-Wildlife Division and other applicable regulators and will be submitted for review prior to Project construction at that site. WEGH2 is committed to an adaptive management approach, and as such, these plans are considered “living” documents that will be updated as applicable to capture Project design updates and results of ongoing environmental monitoring.
Supporting Documentation	None

Response to FFA 88

Comment ID:	FFA 88
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	General
Reviewer’s Comment:	Regarding the sentence: “Should bat hibernacula occur within the LAA, blasting and other loud noise may result in disturbance to hibernating bats”. Change to ‘Should previously unidentified bat hibernacula...’ If a bat hibernacula is discovered during blasting activities, all activities must halt immediately and contact the Wildlife Division. Please add this to the mitigation table.
Response:	Please consider the text in the Environmental Impact Statement, Section 14.5.1.1 to have been updated as requested to read: Should previously unidentified bat hibernacula occur within the Local Assessment Area, blasting and other loud noise may result in disturbance to hibernating bats. In addition, WEGH2 is committed to the following mitigation measure: <ul style="list-style-type: none"> • If a bat hibernaculum is discovered during blasting activities, all activities must halt immediately and contact the Wildlife Division.
Supporting Documentation	None

Response to FFA 89

Comment ID:	FFA 89
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	General
Reviewer’s Comment:	Efforts should be made to discourage bats from roosting in project structures. The mitigations already note that if a colony is found it should reported to 709-637-2025, endangeredspecies@gov.nl.ca and the toll-free bat hotline at 1- 833-434-2287 (BATS) for advice. During decommissioning this will also be important to check if bats are presently using the infrastructure. Any bat exclusions occurring between May 1 and Aug 31 require a permit under the NL ESA and provincial BMPs from the Canadian Wildlife Health Cooperative must be followed, found here: http://www.cwhc-rcsf.ca/bat_health_resources.php#bats-in-buildings . This should be an explicit mitigation for the decommissioning phase.
Response:	<p>WEGH2 acknowledges this recommendation, and is committed to the following new mitigation measure:</p> <ul style="list-style-type: none"> • Prior to decommissioning, infrastructure will be checked to assess if bats are presently using the infrastructure. Any bat exclusions occurring between May 1 and Aug 31 will require a permit under the Newfoundland and Labrador <i>Endangered Species Act</i> and provincial best management practices. <p>WEGH2 is committed to developing site-specific mitigation and monitoring plans for bats for all phases of the Project, under the Species at Risk Impacts Mitigation and Monitoring Plan (SAR IMMP). WEGH2 will consult with NL DFFA-Wildlife Division on the noted mitigation measure as part of development of the SAR IMMP and will submit for review prior to Project construction at that site. WEGH2 is committed to an adaptive management approach, and as such, these plans are considered “living” documents that will be updated as applicable to capture Project design updates and results of ongoing environmental monitoring, including monitoring of bat use of Project infrastructure.</p>
Supporting Documentation	None

Response to FFA 90

Comment ID:	FFA 90
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	General
Reviewer’s Comment:	Suggest re-wording of last sentence of the second paragraph as shown in bold font: ‘Standard curtailments will be used at night from July through September, and pending outcomes of post-construction mortality monitoring, adaptive management may include an increase in cut-in speeds to reduce bat fatalities.
Response:	WEGH2 acknowledges this request and will further consult with Newfoundland and Labrador Department of Fisheries, Forestry and Agriculture (NLDDFA)-Wildlife Division on this suggestion during development of the Species at Risk Impacts Mitigation and Monitoring Plan (SAR IMMP).
Supporting Documentation	None

Response to FFA 91

Comment ID:	FFA 91
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	General
Reviewer’s Comment:	Relating to the sentence: “If bats roost in Project infrastructure, they could be killed during the removal of this infrastructure, particularly in young bats are present that cannot fly.” As previously noted above for sections 14.5.1.2 and 14.5.1.3, a mitigation should exist to prevent bat mortality during decommissioning.
Response:	WEGH2 acknowledges this recommendation. See response to FFA 89.
Supporting Documentation	None

Response to FFA 92

Comment ID:	FFA 92
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	General
Reviewer's Comment:	A bat monitoring report should be submitted to the Wildlife Division (endangeredspecies@gov.nl.ca) after each year of acoustic monitoring. Also in this section, the search radius for the mortality surveys should cover the maximum rotor-swept zone (RSZ) or 120 m in every direction, whichever radius is greatest.
Response:	<p>WEGH2 is committed to providing site-specific reports / data to the Newfoundland and Labrador Department of Fisheries, Forestry and Agriculture (NLDDFA-Wildlife Division). WEGH2 will work with NLDDFA-Wildlife Division to determine the appropriate format and timing for providing reports / data. Monitoring reports and raw acoustic files will be submitted to the NLDDFA-Wildlife Division (endangeredspecies@gov.nl.ca) and Jessica Humber (jessicahumber@gov.nl.ca) after each year of acoustic monitoring.</p> <p>As indicated in the Environmental Impact Statement (EIS), a post-construction wildlife mortality monitoring program will be developed in consultation with NLDDFA-Wildlife Division and Environment and Climate Change Canada (ECCC) Canadian Wildlife Service (CWS). The mortality monitoring program will specify the search radius for bat carcasses based on the recommendation of NLDDFA-Wildlife Division and ECCC CWS.</p>
Supporting Documentation	None

Response to FFA 93

Comment ID:	FFA 93
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	General
Reviewer’s Comment:	Update the last paragraph of 14.10 according to feedback given (above) on section 14.2.2.1
Response:	<p>Consider the last paragraph in Section 14.10 (Predicted Future Environmental Conditions if the Project Does Not Proceed) of the Environmental Impact Statement (EIS) revised as follows:</p> <p>Previous text: The abundance of resident bats (little brown and northern myotis) on the Island of Newfoundland is currently low, in comparison to the abundance prior to the arrival of White-nose syndrome (WNS). WNS was first detected in western Island of Newfoundland in the winter of 2016/2017 (White-nose syndrome response team 2023), resulting in mass fatalities of hibernating bats. It is anticipated that bat populations in western Island of Newfoundland are currently at very low levels, after having seen declines between 94 and 99% (J. Humber, pers comm, December 8, 2022). It is expected that bat populations will begin to slowly recover on the Island of Newfoundland, as they have in other areas (Hooton et al. 2023). If the Project does not proceed, it is expected that little brown myotis and northern myotis populations would be expected to grow as recovery occurs.</p> <p>Revised text: The abundance of resident bats (little brown and northern myotis) on the Island of Newfoundland is currently low, in comparison to the abundance prior to the arrival of white-nose syndrome (WNS). WNS was first confirmed on the Island of Newfoundland in the spring of 2017 (White-nose syndrome response team 2023), resulting in mass fatalities of hibernating bats. In western Newfoundland, WNS-positive bats have been found in early spring near the suspected hibernaculum in the area of Noels Pond and Stephenville Crossing, and estimated population declines of little brown myotis in the region range from 94 to over 99% (J. Humber, pers comm, December 8, 2022). It is expected that bat populations will begin to slowly recover on the Island of Newfoundland, as they have in other areas (Hooton et al. 2023). If the Project does not proceed, it is expected that little brown myotis and northern myotis populations would grow as recovery occurs.</p> <p>References</p> <p>Hooton, L.A., Adams, A.A., Cameron, A., Fraser, E.E., Hale, L., Kingston, S., Fenton, M.B., McGuire, L.P., Stukenholtz, E.E. and Davy, C.M. 2023. Effects of bat white-nose syndrome on hibernation and swarming aggregations of bats in Ontario. Canadian Journal of Zoology, 00: 1-10.</p> <p>White-nose syndrome response team. 2023. Where is WNS now? Available online: https://www.whitenosesyndrome.org/where-is-wns</p>

Project Nujio’qonik: Amendment to The Environmental Impact Statement

Comment ID:	FFA 93
	Personal Communication 2022. Humber, Jessica. Ecosystems Management Ecologist (Endangered Species & Biodiversity). Newfoundland and Labrador Department of Fisheries, Forestry and Agriculture, Wildlife Division. Meeting with Stantec Consulting Ltd, December 8, 2022
Supporting Documentation	None

Response to FFA 94

Comment ID:	FFA 94
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	General
Reviewer’s Comment:	Please provide all raw acoustic files with assigned manual ID’s to Jessica Humber (jessicahumber@gov.nl.ca) and endangeredspecies@gov.nl.ca for review and archiving. Please also include site photographs of each ARU ID (e.g. those in Table 5.3) so that surrounding habitat and degree of clutter can be understood when interpreting acoustic IDs.
Response:	It is agreed that raw acoustic files with assigned manual ID’s will be provided to Jessica Humber (jessicahumber@gov.nl.ca) and endangeredspecies@gov.nl.ca . The 2022 data will be submitted with the 2023 data, once the 2023 data analysis is complete.
Supporting Documentation	None

Response to FFA 95

Comment ID:	FFA 95
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	General
Reviewer’s Comment:	Going forward, please submit annual bat acoustic monitoring reports to Jessica Humber (jessicahumber@gov.nl.ca) and endangeredspecies@gov.nl.ca.
Response:	It is agreed that bat acoustic monitoring reports will be submitted to Jessica Humber going forward.
Supporting Documentation	None

Response to FFA 96

Comment ID:	FFA 96
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	General
Reviewer’s Comment:	Add to the end of the last paragraph that there is a suspected hibernaculum somewhere near the area of Noels Pond and Stephenville Crossing, as multiple WNS-positive bats were found in this area in early spring and WNS-infected bats typically do not travel far when emerging prematurely from hibernacula. However, the location of this hibernaculum is unknown.
Response:	Consider the following text to have been added to the end of the last paragraph of Section 5.3.1 of the Terrestrial Baseline Study in the Environmental Impact Statement (Appendix BSA-3): There is a suspected hibernaculum somewhere near the area of Noels Pond and Stephenville Crossing, as multiple White-nose syndrome (WNS)-positive bats were found in this area in early spring and WNS-infected bats typically do not travel far when emerging prematurely from hibernacula. However, the location of this hibernaculum is unknown.
Supporting Documentation	None

Response to FFA 97

Comment ID:	FFA 97
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	General
Reviewer’s Comment:	Please re-word the last sentence of this section for greater accuracy, since the records for this species are not acoustic. Photographic records exist and there have been some confirmed sightings of the species on the island.
Response:	Consider the last sentence of the last paragraph is section 5.3.1.6 of the Environmental Impact Statement to read as follows: While there are no published records of this species on the Island of Newfoundland, photographic records and confirmed observations of eastern red bat have occurred (J. Humber, pers. comm.).
Supporting Documentation	None

Response to FFA 98

Comment ID:	FFA 98
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	General
Reviewer's Comment:	Error in last paragraph, which references Hoary Bats instead of Big Brown Bat. Note that Big Brown Bats have not been confirmed in Newfoundland or Labrador to date.
Response:	Error corrected. Consider the text in the last paragraph of Section 5.3.1.6 of the Terrestrial Baseline Study in the Environmental Impact Statement (Appendix BSA-3) to have been updated to read: Big brown bats have not been confirmed on the Island of Newfoundland, nor in Labrador.
Supporting Documentation	None

Response to FFA 99

Comment ID:	FFA 99
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	General
Reviewer's Comment:	Refer to habitat assessment comments made on 14.2.2.7 in the main EIS document.
Response:	Please refer to the response to FFA 81.
Supporting Documentation	None

Response to FFA 100

Comment ID:	FFA 100
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	General
Reviewer’s Comment:	Please also present bat activity in standardized units reflecting unit effort, e.g. passes per detector night. Pairing local wind speed and temperature data with recorded bat passes is recommended in future monitoring years, if possible (e.g. through new met towers?)
Response:	Table 5.4 of the Terrestrial Baseline Study in the Environmental Impact Statement (Appendix BSA-3) has been updated to reflect standardized units as noted above. The updated Table (now called Table FFA 100.1) is provided below. Note that the record of <i>Myotis septentrionalis</i> has been moved to the <i>Myotis</i> Species category, as per the response to FFA78. In future years of data collection, local wind speed and temperature data will be paired with bat passes to determine weather related trends.
Supporting Documentation	Table FFA 100.1 Number of Bat Echolocation Call Files Recorded at ARUs on the Port au Port Peninsula near the Codroy Wind Farm, Fall 2022

Table FFA 100.1 Number of Bat Echolocation Call Files Recorded at ARUs on the Port au Port Peninsula near the Codroy Wind Farm, Fall 2022

Site	ARU ID	Number of Recording Nights	Number of Call Files Recorded / Detector Night								
			Little Brown Myotis	Myotis Species	Eastern Red Bat	Hoary Bat	Silver-haired Bat	Big Brown/Silver-haired Bat	High Frequency Species Unknown	Low Frequency Species Unknown	Total
Port au Port	P-1	51						0.02			0.02
	P-2	51						0.02			0.02
	P-3	51		0.02							0.02
	P-4	46	0.30		0.04			0.33	0.04	0.11	0.83
Codroy	C-5	54									0.00
	C-6	17	1	0.59					0.12		1.71
	C-7	49		0.06		0.02	0.04	0.02	0.02	0.04	0.20
	C-8	49								0.02	0.02
Total			1.30	0.67	0.04	0.02	0.04	0.39	0.18	0.17	2.82

Response to FFA 101

Comment ID:	FFA 101
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	General
Reviewer’s Comment:	Once micro-siting of the Project components is completed, the buffers for access roads and turbines (300m) as well as transmission lines (350m) must be reduced (provide reasons for maintaining) if not removed.
Response:	Buffer width will be reviewed and reduced to the extent appropriate once micro-siting of Project components is completed. However, micro-siting will continue during construction as a mitigation to avoid sensitive habitats and species, if feasible.
Supporting Documentation	None

Response to FFA 102

Comment ID:	FFA 102
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	General
Reviewer’s Comment:	Shorebirds (13.5.1.1 - p. 13.52) For clarity ‘Common Snipe’ must be renamed ‘Wilson’s Snipe’ throughout the document. Common Snipe is now only the species native to Europe/Asia. Raptors (13.5.1.1 - p. 13.53) Proponent to add Boreal Owl (<i>Aegolius funereus</i>) to raptor list. Likely populations have declined in Newfoundland
Response:	Noted. Thank-you. Please consider the species name to be updated to Wilson’s snipe, and boreal owl to be considered potentially present within the Local Assessment Area.
Supporting Documentation	None

Response to FFA 103

Comment ID:	FFA 103
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	General
Reviewer's Comment:	Landbirds (13.5.1.1 - p. 13.55) WD disagrees with the statement that "Residual effects of construction phase on landbirds will 'occur during times of no sensitivity'." Construction time overlaps with breeding, migrating, and winter periods so residual effects will occur during sensitive times.
Response:	Please consider this statement in Section 13.5.1.1 of the Environmental Impact Statement revised as follows: "Residual effects of construction phase on landbirds will occur during times of no to high sensitivity"
Supporting Documentation	None

Response to FFA 104

Comment ID:	FFA 104
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	General
Reviewer's Comment:	This seems a likely typo: change 'shorebirds' to 'waterfowl' in last paragraph
Response:	Please consider this sentence in Section 13.5.1.1 of the Environmental Impact Statement changed to: "The effects of operation and maintenance on mortality of waterfowl are expected to be adverse, low in magnitude, restricted to the LAA, occur in times of no to high sensitivity, be long-term, continuous, and reversible ."
Supporting Documentation	None

Response to FFA 105

Comment ID:	FFA 105
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	General
Reviewer's Comment:	Occurrence in the Project Area for Caribou and Arctic Hare seems to be set to null. WD would like to know what that information is based on. From our end, the occurrence is unknown for parts of the Project Area hence we are requesting surveys to establish baseline information within the project area
Response:	<p>Table 15.1 in the Environmental Impact Statement (EIS) (Species Assemblages and Assessed Species for the Evaluation of Other Wildlife) indicates that the range of caribou may overlap Transmission Line infrastructure for the Project (based on the delineation of Caribou Management Area 61), and aerial surveys for the Project in winter 2023 confirmed the presence of caribou in an expected location north of Stephenville Crossing. Table 15.1 in the EIS also indicates that arctic hares are expected in the Codroy Wind Farm area, although WEGH2 acknowledges that there is uncertainty surrounding their distribution.</p> <p>Additional surveys for caribou are planned for winter 2024, and arctic hare surveys are planned for spring 2024; these surveys will follow approved protocols provided by the Newfoundland and Labrador Department of Fisheries, Forestry and Agriculture (NLDFFA)-Wildlife Division. Site-specific reports / data will be provided to regulators prior to Project construction at that site, either as a standalone submission or as part of developing the required mitigation and monitoring plans. WEGH2 will work with NLDFFA-Wildlife Division to determine the appropriate format and timing for providing reports / data.</p>
Supporting Documentation	None

Response to FFA 106

Comment ID:	FFA 106
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	General
Reviewer’s Comment:	<p>(a) Muskrat is also a SOCC category (like Arctic Hare)</p> <p>(b) There is a high likelihood for marten to occur within other parts of the Project footprint. The table seems to address previously designated CH and core areas.</p> <p>(c) Arctic Hare: Protocols – NLDFFA-WD supplied the Arctic Hare Pellet survey protocol (please remove S. Garland pers. comm. 2023 as she sent it on behalf of WD for another reviewer)</p> <p>(d) Yellow-banded bumble bee (YBBB) (15.2.2.2 – p. 15.28) YBBB was listed under the NL ESA as Vulnerable in July 2023</p>
Response:	<p>(a) Noted. Thank you..</p> <p>(b) Noted. Thank you. While Table 15.1 of the Environmental Impact Statement (EIS) references marten distribution based on the area of proposed marten critical habitat, Section 15.2.2.2 of the EIS also states that “The Port au Port East wind farm and Codroy wind farm are within the extent of marten occurrence and this species has been observed near the Project Area for both sites (COSEWIC 2022).”</p> <p>(c) Noted, thank you. Consider Table 15.2 of the EIS updated to reference “NLDFFA-WD (2023)”.</p> <p>(d) Noted. Thank you.</p>
Supporting Documentation	None

Response to FFA 107

Comment ID:	FFA 107
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	General
Reviewer’s Comment:	Habitat Occurrence in the Project Area note cattails have not been recorded as being used as lodges in Newfoundland and have not been yet identified to be preferentially used by muskrat on the Island. Be cautious to not prioritize cattail habitats as the prime habitat for muskrat on the Island over other habitats. EIS states: “Cattails (e.g., <i>Typha latifolia</i>) are a preferred food source and building material for muskrat lodges; however, cattails are relatively rare in Newfoundland and, in western Newfoundland, sedge (<i>Carex</i> sp.), iris (<i>Iris versicolor</i>), horsetail (<i>Equisetum</i> sp.), pondweed, and rush (<i>Eleocharis</i> sp.) are the primary food source and lodge building material for muskrat (Soper 1995).” Also consider <i>Sparganium americanum</i> (<i>emersum</i> ?) may also be used for lodge building.
Response:	Noted. WEGH2 completed a muskrat survey in 2023 following provincial protocols and the report is appended to this EIS Amendment as Appendix 2-D.
Supporting Documentation	Appendix 2-D, 2023 Muskrat Technical Data Report

Response to FFA 108

Comment ID:	FFA 108
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	General
Reviewer’s Comment:	<u>Newfoundland Marten (15.2.2.5 - p. 15.23)</u> : Habitat Occurrence in the Project Area include red-backed vole as a key prey species. SAR status has changed to Vulnerable in July 2023, please correct WD notes that the numbering system in Chapter 15 seems incorrect for 15.2.2.2 (used for both Moose and Yellow-banded bumble bee)
Response:	Noted. Thank you. Consider Section 15.2.2.5 of the Environmental Impact Statement revised to indicate a Vulnerable status for marten and to include southern red-backed vole (<i>Myodes gapperi</i>) as a key prey species. Noted. Thank you.
Supporting Documentation	None

Response to FFA 109

Comment ID:	FFA 109
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	General
Reviewer’s Comment:	<p>(a) In general: “where feasible”, “where possible” and “where practical” are not acceptable mitigation measures. Better stated where not possible, mitigation a, b and/ or c) are expected to occur. Otherwise, who determines a) what falls under e.g. "not feasible" and b) keeps track of the amount of these exemptions?</p> <p>(b) In general: wordings around buffers e.g. “will be buffered” or “appropriate buffers be maintained” – as a mitigation these buffers must be specified based on guidelines (30m, 75m, 100m etc.)</p> <p>Mitigation #148 – define “noise elevated activities” and “wildlife”</p> <p>(c) Mitigation #335 – why is this mitigation limited to caribou only? (what about other big game and furbearer species?)</p> <p>(d) IMMP – will there be a separate one for non SAR species?</p>
Response:	<p>(a) Those terms are referring to technical feasibility and uncertainty at this stage of project planning. Feasibility refers to the limits of constructability related to aspects of the environment such as slope and bedrock stability. These construction considerations are currently being analyzed. WEGH2 is committed to working with regulators to develop clearly defined site-specific mitigation measures in the respective environmental management plans. The plans will be developed in consultation with applicable regulators and will be submitted for review prior to Project construction at that site. These plans are considered “living” documents that will be updated as applicable to capture Project design updates and results of ongoing environmental monitoring and regulatory consultation.</p> <p>(b) WEGH2 will work with applicable regulatory agencies to confirm noise / disturbance thresholds and appropriate site-specific buffers for relevant species/species groups and habitat features (e.g., dens, nests), which will be incorporated into mitigation and monitoring plans.</p> <p>(c) Consider Mitigation #335 of the EIS revised to include caribou and other mammal SAR/SOCC. Specifically, the on-site environmental team will be notified if caribou or other mammals 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.</p> <p>(d) In addition to the Species at Risk (SAR) Impacts Mitigation and Monitoring Plan, there will be additional programs developed for avifauna and other wildlife, including non-SAR species, to verify the accuracy of the predictions made in the effects assessment and the effectiveness of the mitigation measures (Section 7.8 and Section 7.9 of the EIS Guidelines).</p>

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Comment ID:	FFA 109
Supporting Documentation	None

Response to FFA 110

Comment ID:	FFA 110
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	General
Reviewer's Comment:	<u>Appendix BSA-3 - 6.2.2.3 Muskrat</u> - For recommended habitat characteristics for survey sites, survey sites should but are not required to have all the listed features, e.g. "entire waterbody have 50-80% coverage by emergent vegetation" = these are just some of the ideal conditions for detecting the presence of muskrat
Response:	Noted, thank you. This is clarified in the Technical Data Report appended to this EIS Amendment (Appendix 2-D)
Supporting Documentation	Appendix 2-D, 2023 Muskrat Technical Data Report

Response to FFA 111

Comment ID:	FFA 111
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	4.2.3 Terrestrial Environment 4.3 Baseline Studies Avifauna
Reviewer's Comment:	In their review of the EIS, ECCC noted that Western Newfoundland is part of the Atlantic Flyway, and that landbirds will move through the project area en masse and use the Port au Port Peninsula and the Codroy Valley / Port-aux-Basques area as staging sites and departure locations to mainland areas during migration. ECCC highlighted data gaps in the EIS regarding migratory flyways and recommended comprehensive migration monitoring using radar and diurnal surveys to thoroughly assess movement and staging on landbirds in the Project Areas. WD supports this recommendation and data acquired should be included in the Avifauna Management Plan (per section 7.2 of the EIS Guidelines).

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Comment ID:	FFA 111
Response:	<p>WEGH2 acknowledges that this area is an important area for birds, particularly during migration. Baseline surveys at Port au Port peninsula were completed in 2023 and additional studies (including radar) at Port au Port and Codroy are planned for 2024.</p> <p>Surveys completed in 2023 included:</p> <ul style="list-style-type: none"> • Aerial Surveys for wintering waterbirds • Aerial Survey for Harlequin Duck and Purple Sandpiper • Land-based Coastal Waterbird Survey • Wintering/Resident Landbird Survey • Spring and Fall Shorebird Survey • Spring and Fall Migration/Flight Path Survey • Fall Waterfowl Surveys • Nocturnal Owl Breeding Survey • Short-eared Owl Breeding Survey • Breeding Marshbird Monitoring Survey • Breeding Gull/Tern Survey • Inland Breeding Waterfowl Survey • Bank Swallow Breeding Survey • Seabird Colony Survey • Breeding Bird Survey Point Counts • Deployment of Autonomous Recording Units (ARUs) <p>Results of surveys (Appendix 2-B of this EIS Amendment) will be incorporated into the Avifauna Impacts, Mitigation, and Monitoring Plan.</p>
Supporting Documentation	Appendix 2-B 2023 Bird and Bat Interim Technical Data Report

Response to FFA 112

Comment ID:	FFA 112
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	4.2.3 Terrestrial Environment 4.3 Baseline Studies Species at Risk
Reviewer’s Comment:	<p>WD requires new baseline data to be collected in the field for three avian species at risk (Short-eared Owl, Common Nighthawk, and Gray-cheeked Thrush). These will help inform the Species at Risk Impacts Mitigation and Monitoring Plan (SAR IMMP):</p> <p>i) For Short-eared Owl, at least 2 years of surveys are required, since this is an irruptive species and may be present one year but not the next. Ideally, 2 years of Short-eared Owl surveys would occur prior to construction. Surveys are required in appropriate habitat in the entire Local Assessment Area, as shown in Figure 15.1 of the EIS.</p> <p>ii) Nightjar surveys should be conducted following the Canadian Nightjar Survey Protocols (2022) for at least one breeding season prior to construction. Surveys are required in the entire Local Assessment Area, as shown in Figure 15.1 of the EIS.</p> <p>iii) Gray-cheeked Thrush surveys are required for at least one breeding season in all locations within the Local Assessment Area, as shown in Figure 15.1 of the EIS, where the elevation is 300 m a.s.l. or higher.</p>
Response:	<p>Baselines surveys were completed in 2023, including targeted Short-eared Owl Surveys. Breeding Bird Surveys (point counts and ARUs) will document nightjars and Gray-Cheeked Thrush (if present).</p> <p>Other surveys that may also record the above SAR and completed in 2023 included:</p> <ul style="list-style-type: none"> • Wintering/Resident Landbird Survey • Spring and Fall Migration/Flight Path Survey • Nocturnal Owl Breeding Survey <p>Additional surveys are planned for 2024 in Codroy. Results of the surveys completed in 2023 will be incorporated into the Avifauna and SAR IMMP.</p>
Supporting Documentation	None

Response to FFA 113

Comment ID:	FFA 113
Department:	Fisheries, Forestry and Agriculture
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	4.2.3 Terrestrial Environment 4.3 Baseline Studies Species at Risk
Reviewer’s Comment:	All other SAR baseline surveys are still required, including plants, bats, Arctic hare, etc. These will help inform the SAR IMMP.
Response:	<p>WEGH2 is committed to completing the analysis and reporting on Project-specific data collected for terrestrial Species at Risk (SAR) and Species of Conservation Concern (SOCC) in 2023, including plants, bats, and arctic hare. Interim reports / data for the following terrestrial surveys completed in 2023 are appended to this document:</p> <ul style="list-style-type: none"> • Avifauna • Bats • Muskrat • Rare Plants <p>Additional SAR/SOCC baseline data collection is planned in 2024 for caribou (winter aerial surveys), arctic hare (spring pellet surveys) and other SAR/SOCC (e.g., bats). Site-specific reports / data for these surveys will be provided to regulators prior to Project construction at that site, either as a standalone submission or as part of developing the required mitigation and monitoring plans (e.g., SAR Impacts Mitigation and Monitoring Plan). WEGH2 will work with Newfoundland and Labrador Department of Fisheries, Forestry and Agriculture-Wildlife Division to determine the appropriate format and timing for providing reports / data.</p>
Supporting Documentation	<p>Appendix 2-B, 2023 Bird and Bat Interim Bird and Bat Technical Data Report</p> <p>Appendix 2-C, Land Cover Classification and Rare Plants Technical Data Report – Port au Port Wind Farm</p> <p>Appendix 2-D, 2023 Muskrat Technical Data Report</p>

6.0 NL Department of Health and Community Services

The Newfoundland and Labrador (NL) Department of Health and Community Services (HCS) has provided detailed comments based on their review of the Project Environmental Impact Statement (EIS). The detailed comments and the responses from World Energy GH2 (WEGH2) are provided in Section 6.1.

6.1 Detailed Comments

Response to HCS 1

Comment ID:	HCS 1
Department:	Health and Community Services
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	Section 2 – Preparation and Presentation of the EIS - “The EIS shall provide charts, diagrams, and maps wherever useful to clarify the text, including a depiction of how the developed Project sites will appear from both an aerial and terrestrial perspective.”
Reviewer’s Comment:	The location and rationale for selecting the nearest receptors is not clearly explained or described. receptors are identified on some figures showing a part of project area, but maps do not appear to be provided for all receptors.
Response:	<p>The receptors included in the Environmental Impact Statement (EIS) were based on a desktop review of existing aerial imagery and government databases, as well as verification by helicopter near the Codroy Wind Farm in the Anguille Mountains that was undertaken as part of the EIS. An initial review of available government census data was used to collect potential nearby receptors. While this review was useful for collecting receptors, such as schools, hospitals, places of worship and other institutional or public spaces, the government census data needed to be supplemented by a review of publicly available aerial imagery to identify potential residential receptor locations. Initial public engagement also led to an additional campaign of helicopter flights to identify additional potential receptor locations near the Codroy Wind Farm in the Anguille Mountains. If anthropogenic structures were identified through these data reviews, they were assumed to be a potential receptor and so were included in the receptor list.</p> <p>The different disciplines then consulted this list of potential receptors to complete their respective assessments, and used their own labelling of receptors to align with the context of their assessment. Further information on the rationale for selection of receptors for the noise and air quality assessment, shadow flicker study and visual impact assessment are provided below in this response.</p> <p>A combined mapbook for the Project Area at a 1:50,000 scale showing the receptors for each of the supporting EIS studies described below is provided in Appendix HCS1-A. A table of distances from each public receptor to the nearest turbine is provided in Appendix HCS1-B. A summary table of other modelled receptors closest to each turbine is provided in Appendix HCS1-C.</p>



<p>Comment ID:</p>	<p>HCS 1</p>
	<p>In each of these appendices, receptors within 1,500 metres of a turbine are bolded. These distances reflect the new revised turbine layout for the Port au Port Wind Farm as described in Section 2.5 of this EIS Amendment. As described in Section 2.5, some turbines have been removed from the site layout in response to feedback from regulators. Note that the layout of the turbines for both the Port au Port and Codroy Wind Farms will continue to be subject to micro siting informed by planned geotechnical investigations, continued gathering of site-specific environmental field data and advancement of Project design. Once the final layout is determined and this field verification is conducted, the noise and shadow flicker models will be reviewed based on the updated layout to confirm continued compliance with required guidelines and WEGH2’s commitment to maintain a wind turbine setback distance of 1-kilometre from residences.</p> <p>Noise Assessment Receptors</p> <p>For the noise assessment, the selection of receptors was described in Section 7.5.1 of the Environmental Impact Statement (EIS; Stantec 2023) and the receptors carried forward in the assessment are summarized in Appendix 7-A (Noise Modelling Results by Receptor) of the EIS and shown in Figure 7.3 of the EIS.</p> <p>As stated in Section 7.5.1 of the EIS:</p> <p>“A total of 812 receptors within the LAA and RAA were considered in the acoustic model; these are shown in Figure 7.3. The receptors represent noise-sensitive locations such as homes, cabins, hospitals or schools located outside of the facility fence line. Where a receptor location was identified by satellite imagery or government databases but could not be confirmed through surveys, those receptors were included in the assessment.”</p> <p>Air Quality Assessment Receptors</p> <p>For the air quality assessment (dispersion modelling conducted for the operation phase of the hydrogen / ammonia plant), the selection of receptors was described in Appendix 6B Dispersion Modelling Strategy of the EIS and displayed in Figure 6B.4 of the EIS.</p> <p>As described in Appendix 6B of the EIS, the receptor grid used in the model was developed based on the NL Guideline for Plume Dispersion Modelling (NLDMAE 2012). The nested grids were expanded beyond the minimum limits in the model guideline because of the large area of the site.</p> <p>The receptor grid spacing used in the model is as follows:</p> <ul style="list-style-type: none"> • 20 metre spacing along the Project Area boundary • 50 metre spacing from the center of operation (center of the facility area) out to 750 metres • 100 metre spacing from 750 metres out to 1,500 metres • 200 metre spacing from 1,500 metres out to 4,000 metres • 500 metre spacing from 4,000 metres out to the 15,000 metres (to define the 30 km x 30 km grid) <p>Gridded receptors that fall within the Project Area boundary associated with the hydrogen / ammonia plant and the marine terminal area were removed from the</p>



<p>Comment ID:</p>	<p>HCS 1</p>
	<p>model. The maximum predicted concentrations outside the Project Area are used in the assessment for comparison with the ambient air quality standards.</p> <p>Receptors representing sensitive receptors (hospitals, schools, public areas, etc.) within the LAA were also included in the model, even if they were outside the 30 km x 30 km grid.</p> <p>The gridded and discrete receptor (sensitive institution) locations are shown in Figure 6B.4. A full list of sensitive receptors is summarized in Table 6B-4.</p> <p>Shadow Flicker Assessment Receptors</p> <p>The methods used to identify potential receptors are described at the beginning of this response. The shadow flicker assessment considered dwellings located within 1500 m of the proposed turbine locations for the Project. The location of the receptors identified using the methodology described above are provided in Appendix 19-C (Codroy Wind Farm, Shadow Flicker Assessment), Figure 1 – Codroy Wind Farm Shadow Flicker Project Location, and in Appendix 19-D (Port au Port Wind Farm, Shadow Flicker Assessment), Figure 1 – Port au Port Wind Farm Shadow Flicker Project Location.</p> <p>Visual Assessment Sensitive Resources</p> <p>The visual assessment (Visual Assessment Technical Report - Appendix 19-A of the EIS) was undertaken to identify publicly available/accessible locations that may be deemed of interest by the local community and visitors. As identified in the visual assessment, 110 resources were identified based on the following categories: 1) major local or Provincial recreation areas, 2) a designated trail (not part of a park), 3) a property designated as historic, 4) Provincial natural landmarks, 5) highway of high volume, 6) known designated scenic overlooks and vistas, and 7) communities. In addition, locations that can be considered “representative” and of interest to the local community (e.g., cemeteries, community buildings, and schools) were also identified. All of these resources were identified in the completed viewshed mapping contained in the visual assessment; this mapping identifies potential areas of visibility throughout the individual study areas, thus one may identify visibility of specific interest, even if that point/area was not identified as a resource.</p> <p>References</p> <p>Newfoundland and Labrador Department of Municipal Affairs and Environment (NLDMAE). 2002, Revised 2012. Guideline for Plume Dispersion Modelling. Available online at: https://www.gov.nl.ca/mae/files/env-protection-science-gd-ppd-019-2.pdf</p>
<p>Supporting Documentation</p>	<p>Appendix HCS1-A Mapbook - Receptor Locations Near the Project Area</p> <p>Appendix HCS1-B Public Receptors Considered in the EIS and Distance to Nearest Turbine</p> <p>Appendix HCS1-C Closest Non-Public Receptor (e.g., Residences / Cabins) to Each Turbine as Considered in the EIS</p>



Response to HCS 2

Comment ID:	HCS 2
Department:	Health and Community Services
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	Section 3 – Outline of the EIS - Executive Summary
Reviewer’s Comment:	The Executive Summary outline meets the requirements described in the EIS Guidelines.
Response:	Thank you for confirmation that requirements were addressed in the EIS. No further response required.
Supporting Documentation:	None

Response to HCS 3

Comment ID:	HCS 3
Department:	Health and Community Services
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	Section 3.1.3 – Overview of the Undertaking – “The key components of the undertaking shall include but not be limited to: (a) all wind energy generation sites...”
Reviewer’s Comment:	The specific locations of wind turbines have not been finalized. As such, the potential impacts on nearby receptors have been assessed based on rough locations only. The EIS states that “World Energy GH2 is committed to not constructing turbines within 1 km from a receptor location” (Appendix 19-C, page 17) and “no turbines will be sited within 1 km from any residence in the final layouts used for construction at both sites” (Appendix 19-B, page 10). It is unclear if this commitment is achievable, and estimates of potential impacts based on a 1 km separation distance from all receptors has not been provided. Setbacks may need to be greater than 1 km to meet commitment #320 in Appendix 26, “WEGH2 will establish sufficient setback of wind turbines to mitigate risk to surrounding residences.”
Response:	As discussed in Chapter 19 (Human Health and Quality of Life) of the Environmental Impact Statement (EIS), numerous peer-reviewed publications and government agency reports have reviewed the available scientific literature and concluded that adverse health impacts are not anticipated where wind turbines are sited such that audible noise guidelines are not exceeded (e.g., Berger et al. 2015; Health Canada 2014; Knopper et al., 2014). The acoustic modelling presented in Chapter 7 (Acoustic Environment) of the EIS based on the draft wind turbine layout indicated that Project-related noise would be below the applicable guidelines provided by Health Canada (2017) to be protective of annoyance and sleep disturbance.



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Comment ID:	HCS 3
	<p>As such, it was concluded in Chapter 19 that residual effects to quality of life due to Project operation will be low. Refer also to the response to HCS 1 and associated appendices for supplementary mapping and distance information for the receptors assessed in the EIS.</p> <p>Please refer to Chapter 2, Sections 2.4 and 2.5 of this EIS Amendment for a description of refinements to the Project since submission of the EIS. It is not expected that a setback greater than 1 kilometre will be required to meet the Health Canada (2017) guidelines. However, once the final layout is determined, the noise model will be reviewed based on the updated layout to confirm continued compliance with the Health Canada (2017) guidelines.</p> <p>References:</p> <p>Berger RG, Ashtiani P, Olsson CA, Whitfield Aslund M, McCallum LC, Leventhall G, Knopper LD. 2015. Health-based audible noise guidelines account for infrasound and low-frequency noise produced by wind turbines. <i>Front Public Health</i>. Feb 24;3:31. doi: 10.3389/fpubh.2015.00031. PMID: 25759808; PMCID: PMC4338604.</p> <p>Health Canada. 2017. <i>Guidance for Evaluating Human Health Impacts in Environmental Assessment: Noise</i></p> <p>Health Canada. 2014. <i>Wind Turbine Noise and Health Study: Summary of Key Findings</i>. Available at: https://publications.gc.ca/collections/collection_2014/sc-hc/H129-46-2014-eng.pdf</p> <p>Knopper, LD; Olsson, CA; McCallum, LC; Whitfield Aslund, ML; Berger, RG; Souweine, K; McDaniel, M. 2014. Wind Turbines and human health. <i>Frontiers in Public Health</i>. June 2014 Volume 2. doi: 10.3389/fpubh.2014.00063</p>
Supporting Documentation:	None



Response to HCS 4

Comment ID:	HCS 4
Department:	Health and Community Services
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	Section 3.2.1 (a) – The Proposed Undertaking – “GPS locations and proximity of Project components to existing environmental features, including but not limited to... i. nearest temporary and permanent residential dwellings and commercial and industrial sites”
Reviewer’s Comment:	The location and rationale for selecting the nearest receptors is not clearly explained or described. Receptors are identified on some figures showing a part of project area, but maps do not appear to be provided for all receptors. Proximity of specific residential dwellings, commercial and industrial sites to project components do not appear to be provided.
Response:	Please refer to response to HCS 1 and associated appendices.
Supporting Documentation	None

Response to HCS 5

Comment ID:	HCS 5
Department:	Health and Community Services
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	Section 3.2.3.1 – General Layout “The EIS shall provide a written and graphic description (e.g. maps, aerial imagery and drawings) of the following physical features of the undertaking... (a) each wind energy generation site... including but not limited to a description of the following... iv. Storage areas for explosives associated with blasting (b) the hydrogen and ammonia production facility... iv. Office buildings, worker accommodations and
Reviewer’s Comment:	With respect to storage areas for explosives for blasting, page 2.52 of the EIS states that there will be emulsion tankers on site “(one per wind farm)” “in a secured, fenced compound” but the specific locations do not appear to be provided. Construction of a worker accommodations camp for the Port- au-Port site is scheduled to begin in Fall 2023, and a second camp near the Codroy site later, but the specific locations do not appear to be provided in the EIS.
Response:	We propose that explosives be stored at the batch plant locations (refer to Section 2.5 of this Environmental Impact Statement (EIS) Amendment), near Aguathuna and West Bay to allow for continuous security and surveillance.



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Comment ID:	HCS 5
	<p>The timing of camp construction is pending EIS approval and permitting. While exact location of the camps has yet to be confirmed, WEGH2 is evaluating “the Ramp” site near the Stephenville airport. The location for the Codroy camp is pending site evaluation and community consultation.</p> <p>When it comes to operating a camp for a construction site, the following permits will be required from Digital Government and Service NL (DGSNL):</p> <ol style="list-style-type: none"> 1. License to Occupy from Crown Lands, depending on the land ownership of where it’s going (i.e., Private or crown land) <ol style="list-style-type: none"> a. Site layout for the location of the map. Includes dimensions of the buildings. 2. Dependant on where the camp is going (i.e., If it’s off a provincial highway), there may be a requirement for a Highway Access Permit/Preliminary Application to Develop Land. - https://www.gov.nl.ca/dgsnl/licenses/land-dev/highway/ 3. Building Accessibility Registration from DGSNL - https://www.gov.nl.ca/dgsnl/licenses/building/badr/ <ol style="list-style-type: none"> a. There is a list of conditions in the regulations that have to be met in order to make the camp “accessible”. 4. National Building Code (NBC) of Canada Plan Review from DGSNL - https://www.gov.nl.ca/dgsnl/licenses/building/flspr/ <ol style="list-style-type: none"> a. The building chosen for the camp will require engineered drawings stamped by a NL P.Eng ensuring that the construction of the building follow the NBC. b. This submission also requires a detailed site layout with appropriate distances between adjacent buildings (all in the NBC). c. An inspection is performed by the Office of the Fire Commissioner following a design review of the plans. 5. Electrical Permit from DGSNL (done by the contractor who will be connecting the camp to power) - https://www.gov.nl.ca/dgsnl/licenses/electrical/permits/ <ol style="list-style-type: none"> a. Electrical permits are only issued to registered electrical contractors. 6. Certificate of Approval for Sewage/Septic or Water System from DGSNL - https://www.gov.nl.ca/dgsnl/licenses/env-health/septic/greater/ <ol style="list-style-type: none"> a. Site plan is required, showing property boundaries, distances to nearby water bodies, location of camp and planned septic system. b. Details required of the proposed water treatment system plus the source of the water use. 7. Certificate of Approval for a Generator operation (from DECCC Pollution Prevention). Unless the camp is being connected to the main grid. 8. Fuel Storage and Handling from DGSNL - https://www.gov.nl.ca/dgsnl/licenses/env-protection/fuel/ 9. Food Establishment License from DGSNL - https://www.gov.nl.ca/dgsnl/licenses/env-health/food/premises/ 10. Environmental Approval for Waste Management System from DGSNL - https://www.gov.nl.ca/dgsnl/licenses/env-protection/waste/
Supporting Documentation:	None



Response to HCS 6

Comment ID:	HCS 6
Department:	Health and Community Services
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	<p>Section 3.2.3.2 – Construction</p> <p>- “Details of materials, methods, schedule, and locations of all construction activities (including permanent and temporary infrastructure related to physical features) shall be described, including...</p> <p>(c) sources, predicted decibel levels and duration of noise, including noise during blasting</p> <p>(e) construction and establishment of Project structures and infrastructure in protected water supply areas</p> <p>“The following plans for the construction of the Project shall be included in the EIS...</p> <p>iii. A Transportation Impact Study and Traffic Management Plan</p>
Reviewer’s Comment:	<p>(c) Section 7.5.1.1 – Tables 7.11 and 7.17 - It is unclear why two of the receptor locations used for the construction phase are different for the operation phase (i.e. Codroy 19 vs Codroy 16; and Port au Port 510 vs Port au Port 791). It would be helpful to provide additional justification regarding this change, given that operational noise levels were predicted to be the same at Codroy 16 and 19, and the locations of the selected receptor locations are not identified on any map in the noise section.</p> <p>It is unclear whether the 15 dB reduction in sound transmission from indoors to outdoors was applied to campers/tents at the campground, which may not be appropriate.</p> <p>The construction period is described to be 30 months in length. Construction noise at any given location lasting more than 1 year may need to be assessed as operational noise, according to Health Canada’s Guidelines.</p> <p>(e) - BSA-2 shows the transmission line in protected water supply areas, but no there is no description of materials or methods to mitigate risk to water supplies.</p> <p>Appendix 2-C, section 3.1 includes the annual average daily traffic data for 2013. This may not be representative of current road traffic.</p>
Response:	<ul style="list-style-type: none"> The summary results presented in Tables 7.11 and 7.17 of the Environmental Impact Statement (EIS) include the receptor locations that were predicted to experience the highest sound pressure levels from Project-related activities. The same 812 receptor locations were included in the noise assessment for construction and operation, and their results are included in Appendix 7-A (Noise Modelling Results by Receptor) of the EIS. To assist in reviewing the results of the assessment, revised EIS Figures 7.4, 7.5 and 7.6 are included in this response, and are shown below as Figures HCS6.1 through HCS6.3. The figures have been revised to include the receptor locations that were predicted to experience the highest sound pressure levels from Project-related activities, and they also incorporate the latest wind turbine layout for the Port au Port wind farm as described in Section 2.5 of this EIS Amendment. Tables 7.17 and 7.18 have also been updated to reflect the changes in the Port au Port wind turbine layout, and are shown below in Tables HC6.1 and HCS6.2.



<p>Comment ID:</p>	<p>HCS 6</p>
	<ul style="list-style-type: none"> • We understand that the “15 dB reduction in sound transmission from indoors to outdoors” is in reference to Health Canada’s guideline for evaluating noise-related human health impacts in environmental assessment (Health Canada 2017). In that guidance, Health Canada introduces a sleep disturbance criteria of 30 dBA, and assumes that noise propagation between the outdoors and indoors could be reduced by at least 15 dBA even for indoor spaces with partially open windows. Therefore, the noise assessment used an outdoor sound pressure level of 45 dBA as one criterion to assess impacts on sleep disturbance. • Health Canada guidance recommends assessing construction noise using the same methods and criteria as operational noise when construction is expected to last longer than 1 year (Health Canada 2017). Since construction is expected to last 30 months, construction noise was assessed using the same methods and criteria as noise from operation. • Erosion and sediment control for activities in the Public Protected Water Supply Areas (PPWSAs) will follow the Environmental Guidelines for General Construction Practices from the Water Resource Management Division (WRMD) and are expected to mitigate and limit potential effects during construction. World Energy GH2 (WEGH2) will also make an application for transmission line construction in the PPWSAs that will comply with the Policy for Land and Water Related Developments in PPWSAs. During the application process, WEGH2 will work with WRMD to define constraints and mitigation strategies in the PPWSA further. • The traffic data used in the assessment was supplied by the Newfoundland and Labrador (NL) Department of Transportation and Infrastructure (DTI) and is the latest traffic counts available for the Project Area. Note that population census data for the Town of Stephenville for 2016 (6,623 pop) and 2021 (6,540 pop.) shows a net change of -1.3% in population. <p>References</p> <p>Health Canada. 2017. Guidance for Evaluating Human Health Impacts in Environmental Assessment: Noise</p>
<p>Supporting Documentation</p>	<p>Table HCS6.1 Predicted Sound Pressure Levels from Operations at Nearby Receptors (Revised Table 7.17 of EIS)</p> <p>Table HCS6.2 Predicted Sound Pressure Levels from Operations at Nearby Receptors (Revised Table 7.18 of EIS)</p> <p>Figure HCS6.1 Predicted Sound Pressure Levels (dBA) from Project Operations – Codroy (Revised Figure 7.4 of EIS)</p> <p>Figure HCS6.2 Predicted Sound Pressure Levels (dBA) from Project Operations – Port au Port (Revised Figure 7.5 of EIS)</p> <p>Figure HCS6.3 Predicted Sound Pressure Levels (dBA) from Project Operations – Ammonia Production Facility (Revised Figure 7.6 of EIS)</p>



Table HCS6.1 Predicted Sound Pressure Levels from Operations at Nearby Receptors (Revised Table 7.17 of EIS)

Receptor Region	Receptor with Maximum Predicted Day-Night Sound Pressure Levels	Maximum Predicted Daytime Sound Pressure Levels (L_d) (dBA)	Maximum Predicted Nighttime Sound Pressure Levels (L_n) (dBA)	Maximum Predicted Day-Night Sound Pressure Level (L_{dn}) (dBA)
Codroy	Codroy-16	34	34	40
Port au Port	Port au Port-791	35	35	42
Campground	Campground-1	36	36	43

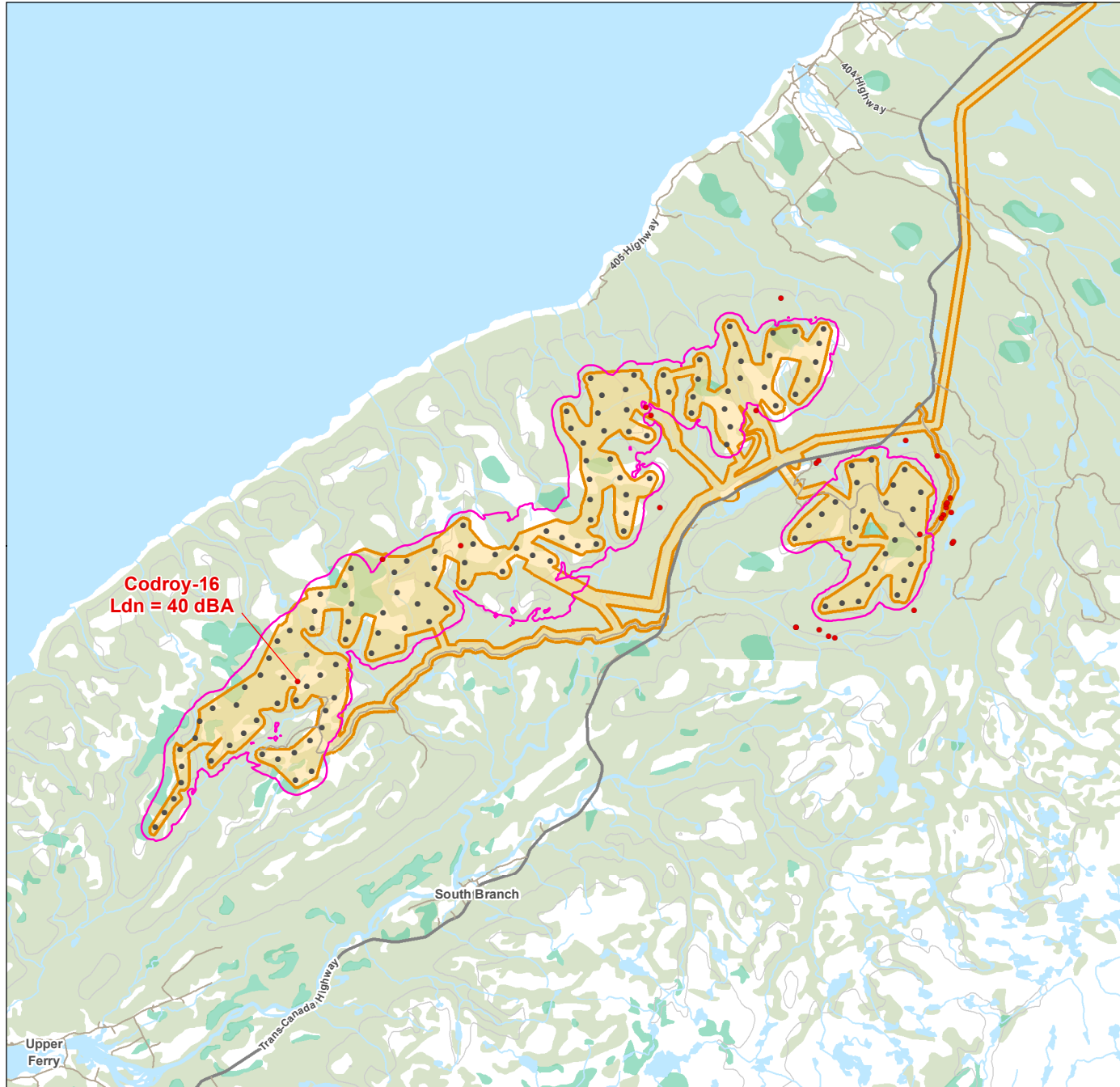
Table HCS6.2 Predicted Sound Pressure Levels from Operations at Nearby Receptors (Revised Table 7.18 of EIS)

Receptor	Baseline		Project Predicted L_{dn} (dBA)	Total (Baseline plus Project)		Change in %HA (Between Total and Baseline)
	L_{dn} (dBA)	%HA		L_{dn} (dBA)*	%HA	
Codroy-16	48	1.69	40	49	1.85	0.16
Port au Port-791	44	1.00	42	46	1.30	0.29
Campground-1	45	1.14	43	47	1.47	0.33

Notes:
 *The total L_{dn} represents the expected noise level at the receptors during the operation period; it is the modelled L_{dn} result at the receptor plus the baseline L_{dn} at the nearest receptor.



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- Sensitive Receptor
- Day-Night (Ldn) Sound Pressure Level (dBA)**
- 35
- Proposed Project Features**
- Turbine Location
- ▭ Project Area
- Other Features**
- Trans-Canada Highway
- Road
- Contour (100 m)
- Watercourse
- Waterbody
- Wetland
- Forested Area



0 2.5 5 Kilometres
(At original document size of 8.5x11)
1:250,000

- Notes**
- Coordinate System: NAD 1983 CSRS UTM Zone 21N
 - Data Sources: Stantec, World Energy GH2, NRCan CanVec, OpenStreetMap
 - Background: NRCan CanVec



Project Location: Stephenville, NL
Prepared by AC on 2024-01-23
QR by AW on 2024-01-23

Client/Project: World Energy GH2
Project Nujio'qonik
121418050_CH06

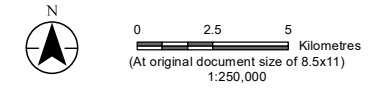
Figure No: Revised 7.4

Predicted Day-Night Sound Pressure Levels (dBA) from Project Operations - Codroy

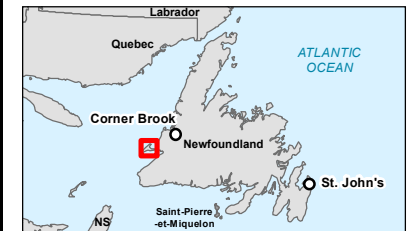
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- Sensitive Receptor
- Day-Night (Ldn) Sound Pressure Level (dBA)
 - 35
- Proposed Project Features
 - Turbine Location
 - Project Area
- Other Features
 - Road
 - Contour (100 m)
 - Watercourse
 - Waterbody
 - Wetland
 - Forested Area



- Notes**
1. Coordinate System: NAD 1983 CSRS UTM Zone 21N
 2. Data Sources: Stantec, World Energy GH2, NRCan CanVec, OpenStreetMap
 3. Background: NRCan CanVec



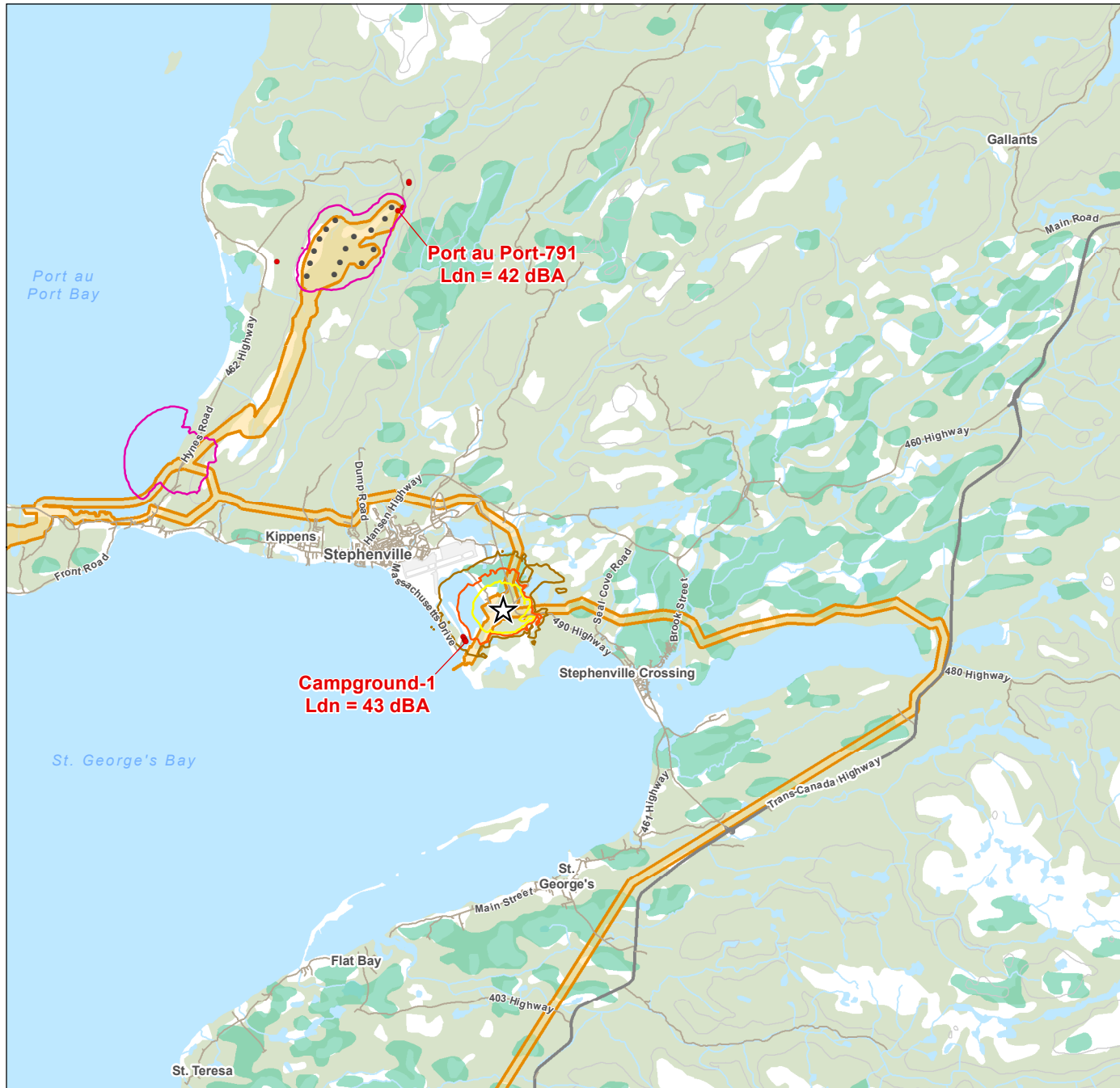
Project Location: Stephenville, NL
 Prepared by AC on 2024-01-23
 QR by AW on 2024-01-23

Client/Project: 121418050_CH06
 World Energy GH2
 Project Nujjo'qonik

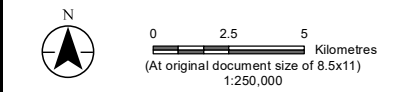
Figure No:
Revised 7.5

Predicted Day-Night Sound Pressure Levels (dBA) from Project Operations - Port au Port

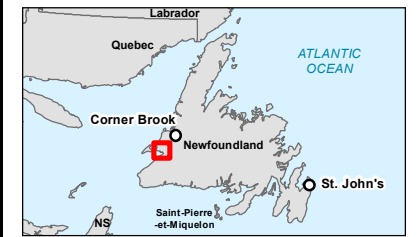
Disclaimer: This document has been prepared based on information provided by others as cited in the Notes section. Stantec has not verified the accuracy and/or completeness of this information and shall not be responsible for any errors or omissions which may be incorporated herein as a result. Stantec assumes no responsibility for data supplied in electronic format, and the recipient accepts full responsibility for verifying the accuracy and completeness of the data.



- Sensitive Receptor
- Day-Night (Ldn) Sound Pressure Level (dBA)**
 - 35
 - 40
 - 45
 - 50
- Proposed Project Features**
 - Turbine Location
 - ★ Hydrogen / Ammonia Plant Location
 - Project Area
- Other Features**
 - Trans-Canada Highway
 - Road
 - Contour (100 m)
 - Watercourse
 - Waterbody
 - Wetland
 - Forested Area



- Notes**
1. Coordinate System: NAD 1983 CSRS UTM Zone 21N
 2. Data Sources: Stantec, World Energy GH2, NRCan CanVec, OpenStreetMap
 3. Background: NRCan CanVec



Project Location: Stephenville, NL
 Prepared by AC on 2024-01-23
 QR by AW on 2024-01-23

Client/Project: World Energy GH2
 Project Nujio'qonik
 121418050_CH06

Figure No. Revised 7.6
Predicted Day-Night Sound Pressure Levels (dBA) from Project Operations - Port au Port East and Ammonia Production Facility

Response to HCS 7

Comment ID:	HCS 7
Department:	Health and Community Services
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	<p>Section 2.2.3.3 - Operation and Maintenance</p> <p>“All aspects of the operation and maintenance procedures for the undertaking shall be described in this section of the EIS, including...</p> <p>(d) wind turbines at all sites...</p> <p>(e) sources, predicted decibels, duration and geographic reach of noise, including long- term, low frequency noise emissions.</p>
Reviewer’s Comment:	<p>(d) - Chapter 2, Section 2.3.2 notes that the specific sizes, model and locations of turbines are yet to be determined. Assessments are based on a ‘worst case’ scenario, with a commitment to a minimum 1 km setback from receptors.</p> <p>(e) Low frequency noise (LFN) does not appear to be considered. Modern wind turbines, particularly those greater than 2.3 MW, produce LFN and this is an important component of the total noise levels experienced by nearby receptors. Similarly, the predicted noise emissions (tonality) of transformers do not appear to be discussed.</p>
Response:	<p>Noise is emitted at a range of frequencies, however, the human ear is more sensitive to some frequencies than others. Since the noise assessment was focused on human health, it is recommended to assess noise principally based on the A-weighting (dBA), which accounts for the sensitivity of the human ear to different frequencies. While this approach works for most situations, there are cases where additional considerations may be required to fully address potential nuisance or human health impacts. One situation is related to Low Frequency Noise (LFN), or noise in the frequency range of 16 Hz to 200 Hz (Health Canada 2017). Sufficiently high LFN can cause annoyance issues even though the human ear is less sensitive to those frequencies.</p> <p>There are several approaches to addressing LFN. One approach is to identify whether a noise source is a likely candidate to generate LFN at levels that may cause nuisance or health-related impacts. One way of identifying LFN sources is to compare the dBA level to another noise weighting scheme called the C-weighting (dBC). If the dBC – dBA is greater than 20, then the source is generally considered to be a LFN source. In this case, the wind turbines currently proposed for the Project have a dBC – dBA of roughly 15, and so they are not considered a strong LFN source. Another approach to addressing LFN is through the sound pressure levels estimated at receptor locations. Health Canada recommends that additional analysis for LFN be undertaken if the total sound pressure level at 16 Hz, 31.5 Hz, and 63 Hz exceeds 70 dB (Health Canada 2017). For this project, the highest total sound pressure level for this frequency range was 58.6 dB, well below 70 dB. For these two reasons, additional analyses for LFN were not warranted for this Project and therefore were not undertaken. Additionally, as discussed in Chapter 19 of the EIS with respect to wind turbine noise, “Low frequency noise was not assessed independently from audible noise in the effects assessment.</p>



Project Nujio’qonik: Amendment to the Environmental Impact Statement

Comment ID:	HCS 7
	<p>From the perspective of assessing change to quality of life from noise, Berger et al. (2015) determined that health-based audible noise limits (e.g., those referenced above) provide an effective means to evaluate, monitor, and protect potential receptors from audible noise as well from low frequency noise (Berger et al. 2015).”</p> <p>Tonal noise are noise sources where a particular frequency has a much higher sound level than the adjacent noise frequencies. The threshold of whether a noise is tonal or not depends on the frequency range. For the case of transformers, the sound power level for the transformer was provided in Table 7.14 of the EIS. The only frequency that was found to be higher than both adjacent frequencies was the 125 Hz band. ISO 1996-2 suggests that the sound level at that frequency would need to be 15 dB higher than the 63 and 250 Hz bands. The 125 Hz frequency was found to be only 2 dB to 5 dB higher than the neighbouring frequencies, and so a tonality penalty was not applied to that source.</p> <p>Therefore, as described above, separate evaluations of low frequency noise and tonality were not warranted for this Project due to the characteristics of the expected noise sources for the Project.</p> <p>References</p> <p>Berger RG, Ashtiani P, Ollson CA, Whitfield Aslund M, McCallum LC, Leventhall G, Knopper LD. 2015. Health-based audible noise guidelines account for infrasound and low-frequency noise produced by wind turbines. <i>Front Public Health</i>. Feb 24;3:31. doi: 10.3389/fpubh.2015.00031. PMID: 25759808; PMCID: PMC4338604.</p> <p>Health Canada. 2017. <i>Guidance for Evaluating Human Health Impacts in Environmental Assessment: Noise</i></p> <p>ISO 1996-2:2017. <i>Acoustics: Description, measurement, and assessment of environmental noise.</i></p>
Supporting Documentation	None



Response to HCS 8

Comment ID:	HCS 8
Department:	Health and Community Services
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	Section 4.2 - Existing Environment
Reviewer’s Comment:	The EIS describes the existing environment, including the atmospheric environment, land and resource use, and communities in various sections and appendices.
Response:	Thank you for confirmation that requirements were addressed in the EIS. No further response required.
Supporting Documentation:	None

Response to HCS 9

Comment ID:	HCS 9
Department:	Health and Community Services
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	Section 4.3 - Baseline Studies – “Baseline Studies shall be prepared for at least the following components: - Atmospheric Environment – Air Quality, Noise, Vibration, and Light
Reviewer’s Comment:	<p>The baseline study for noise was limited to 16 locations, with measurements collected between May 16 and 26, 2023. While the EIS indicates that these sites are representative of the nearest receptors, other EIS maps show receptors that are closer to project components and/or further from highway noise than the chosen baseline monitoring sites. More information is required to justify the monitoring site selections.</p> <p>Furthermore, it would be helpful to have an explanation as to how this monitoring is considered to be representative of all seasons (e.g. hard-packed snow results in reduced noise attenuation over distance.)</p> <p>It is unclear whether the sounds of nature were removed from the baseline noise results, in accordance with Health Canada guidelines.</p> <p>Section 7.2.2.1, Table 7.3 – the Ldn for sites 4W and 7W appear to be overestimated. It would be helpful for the proponent to provide equations used and a sample calculation to confirm that the total Ldn, %HA and change in %HA were calculated correctly using the equations presented in Health Canada’s guidance for evaluating noise (2017).</p>



Project Nujio’qonik: Amendment to the Environmental Impact Statement

Comment ID:	HCS 9
Response:	<p>The main purpose of the baseline noise measurements are to characterize the existing noise environment near the Project. The baseline monitoring locations were selected to capture baseline noise levels for various acoustic environments, including locations that were either close to main roadways, in rural areas without substantial traffic, or in more urban areas. The baseline measurements could then be used as representative for receptor locations with similar land use characteristics and acoustic environments that were identified for the assessment.</p> <p>Also, while fresh snow is considered to be relatively absorptive compared to other land cover types, compacted snow is considered to have similar levels of acoustic absorption to other forms of vegetated cover. Therefore the monitoring locations were considered reasonable to capture noise levels in the region over different seasons.</p> <p>Since the purpose of noise monitoring is to characterize the existing noise environment, care is taken to reduce extraneous noise that occurs during monitoring that would lead to an artificially high baseline noise level. The following considerations were made as part of the baseline noise monitoring program:</p> <ul style="list-style-type: none"> • Monitoring occurred during the spring to avoid busier traffic times in the summer. • Data collected during periods of rain or high winds was excluded. • Noise data were complemented with audio recordings so that extraneous noise could be identified and removed from the baseline analysis, in accordance with Health Canada Guidelines (Health Canada 2017). In some cases, such as wildlife calls or other natural noise, those can remain as they are part of the existing noise environment. Nearby conversations or wildlife encounters would be examples of extraneous noise that would be removed during our quality control reviews. <p>Ldn is the day-night sound pressure level, and is used by Health Canada as an input to their recommended calculation for estimating nuisance from noise, also known as the change in percent highly annoyed (%HA) (Health Canada 2017). The calculations for Ldn, %HA and change in %HA follow the calculation recipe in Appendix F of the Health Canada Noise Assessment Guideline (Health Canada 2017). Rounding does lead to slight discrepancies in the results shown in Table 7.3.</p> <p>References</p> <p>Health Canada. 2017. Guidance for Evaluating Human Health Impacts in Environmental Assessment: Noise</p>
Supporting Documentation	None



Response to HCS 10

Comment ID:	HCS 10
Department:	Health and Community Services
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	Section 4.3.1 - Atmospheric Environment – (c) Vibration – The baseline study shall... provide the distance of the nearest wind turbines to, at a minimum, the following features: i. nearest temporary and permanent residential dwellings and commercial and industrial sites
Reviewer’s Comment:	Section 3.3 describes the monitoring locations (Figure 2.1) and results, but not the nearest receptors.
Response:	<p>WEGH2 has committed to a 1 km buffer between wind turbine and residential dwellings. In addition, the list of receptors, including their coordinates, are provided in Appendix 7-A (Noise Modelling Results by Receptor) of the EIS. The receptor locations are also provided in Figures HCS6.1 through HCS6.3, which are revisions to Figures 7.4, 7.5, and 7.6 of the EIS. Refer to the response to HCS 1 and associated appendices for supplementary mapping and distance information for the receptors.</p> <p>This mapping has revealed 3 outfitting camps within the 1 km buffer of a wind turbine at the Codroy Wind farm. WEGH2 is committed to redesigning the layout of the Codroy wind farm to maintain the 1 km buffer commitment.</p>
Supporting Documentation	<p>Figure HCS6.1 Predicted Sound Pressure Levels (dBA) from Project Operations – Codroy (Revised Figure 7.4 of EIS)</p> <p>Figure HCS6.2 Predicted Sound Pressure Levels (dBA) from Project Operations – Port au Port (Revised Figure 7.5 of EIS)</p> <p>Figure HCS6.3 Predicted Sound Pressure Levels (dBA) from Project Operations – Ammonia Production Facility (Revised Figure 7.6 of EIS)</p>



Response to HCS 11

Comment ID:	HCS 11
Department:	Health and Community Services
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	<p>Section 6.2 – Predicted Environmental Effects of the Undertaking</p> <p>(a) Effects of all phases of the Project on human health and quality of life, including but not limited to:</p> <ul style="list-style-type: none"> i. vibrations, noise emissions and noise levels, including low-frequency noise ii. light emissions, shadow flicker, and nighttime flicker iv. Ice throw from wind turbines
Reviewer’s Comment:	<p>Low frequency noise (LFN) does not seem to be considered in the assessment, even though large turbines are known to produce LFN.</p> <p>Wind turbines may produce higher sound levels than predicted, depending on certain site-specific factors such as wind conditions/shear, proximity to the ocean, climatic and seasonal variations. This can result in noise levels 5 dB higher than predictions based on ISO 9613-2, as applied in this analysis. The predicted noise emissions (tonality) of transformers does not appear to be discussed.</p> <p>While there are no provincial regulations or guidelines regarding shadow flicker, industry standards are commonly based on those applied to turbines in Germany, where there are limits of: a maximum of 30 minutes per day and a maximum of 30 hours per year, as noted in the EIS reference (Koppen, 2017). The assessments provided in Appendices 19-C and 19-D seem to only consider the 30 hour per year maximum standard.</p> <p>Only “active” dwellings were considered in the shadow flicker assessments (Appendices 19-C and 19-D), however inactive dwellings may become active in the future, or may be used seasonally, and should be considered in the assessment.</p> <p>The shadow flicker assessment of the Codroy wind farm provided in Appendix 19-C does not provide sufficient rationale to explain why certain receptors shown on the map (e.g. R23 and R24) were not included in Table 4 (Shadow Flicker Results) even though other nearby receptors (e.g. R5) were included.</p> <p>The shadow flicker assessment of the Port au Port wind farm provided in Appendix 19-D does not provide sufficient rationale to explain why the nearest receptors shown on the map (e.g. R788, R789, R791, R792) were not included in Table 6.1 (Shadow Flicker Results).</p> <p>Appendix 19-B provides a satisfactory assessment of potential ice throw and ice drop from wind turbines, and considers the risk to receptors located more than 400 metres from a turbine to be negligible. Furthermore, reference is made to a commitment of a minimum 1 km setback of turbines from receptors.</p>



Project Nujio’qonik: Amendment to the Environmental Impact Statement

Comment ID:	HCS 11
Response:	<p>With respect to the comment regarding low frequency noise and tonality, please see response to HCS 7, above.</p> <p>The acoustic modelling approach assumed meteorological conditions that are favourable for noise propagation, such as assuming a wind direction simultaneously from each source to a given receptor, and a mix of temperature and humidity that allow for more sound propagation. Siting factors that may affect propagation, such as topography and land cover type (e.g., water, rock, vegetation, and others) were also included in the noise model to represent the landscape near the wind turbines and the ammonia production facility. Therefore the model was assumed to be conservatively (i.e., worst case) estimating noise levels from Project operations, including the operation of the wind turbines.</p> <p>With respect to shadow flicker, all receptors identified were included in the assessment and were therefore considered to be active.</p> <p>The target of 30 hours per year is based on an expected or realistic scenario incorporating cloud cover and operation statistics. Since the statistics used to calculate results for the “Expected Case” include annual averages, results for the expected case are presented in the form of total hours of shadow flicker per year only.</p> <p>Receptors not shown in the results table do not have expected shadow flicker impact. R23 and R24 did not have predicted shadow flicker. Note that R788, R789, R791, R792 did not have predicted shadow flicker.</p>
Supporting Documentation	None

Response to HCS 12

Comment ID:	HCS 12
Department:	Health and Community Services
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	Section 6.3 – Accidents and Malfunctions
Reviewer’s Comment:	The EIS identifies and describes the potential accidents and malfunctions in Chapter 24.
Response:	Thank you for confirmation that requirements were addressed in the EIS. No further response required.
Supporting Documentation	None



Response to HCS 13

Comment ID:	HCS 13
Department:	Health and Community Services
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	Section 7.1 Mitigations – a) “Measures to mitigate adverse effects of the Project on human health and quality of life, including but not limited to the following: i. vibrations, noise emissions and levels, including sustained low-level noise;” b) “Measures to mitigate adverse effects of the Project on community health and quality of life, and services including but not limited to the following: v. health care and community services, including mental health and addiction services and social programs”
Reviewer’s Comment:	Table 7.8 does not appear to consider all the possible mitigation measures listed in Health Canada’s guidance on human health impacts related to noise. While the EIS identifies the potential impact of the Project on workers’ health, particularly in relation to mental health and addictions, it offers little with respect to mitigation measures, apart from the possibility of worker training (“Employee training may include building awareness about the potential effects of drug and alcohol misuse, including social concerns such as effects that workers can have on their community and families” – page 18.44.) It is unclear whether worker benefits will include access to an Employee Assistance Program to support mental health and addictions, or access to paid leave for health/medical reasons.
Response:	The EIS identified mitigation measures where needed to address concerns related to noise emissions in Section 7.4 of the EIS. The residual effects presented in Section 7.5 incorporated those mitigation measures. The effects assessment determined that, with the consideration of those mitigation measures, the Project would not result in a significant adverse environmental impact on the acoustic environment. WEGH2 will implement standard practices to protect the health and safety of Project employees, including the provision of an Employee Assistance Program for Project personnel. In addition, WEGH2 will provide workforce education to address topics such as: <ul style="list-style-type: none"> • encouragement of healthy lifestyle choices, • sensitivity training • anti-harassment training • cultural awareness training
Supporting Documentation	None



Response to HCS 14

Comment ID:	HCS 14
Department:	Health and Community Services
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	Section 7.2.1 Emergency Responses/Contingency Plan
Reviewer's Comment:	The EIS includes Emergency Response/Contingency Plans in Appendix 2-F.
Response:	Thank you for confirmation that requirements were addressed in the EIS. No further response required.
Supporting Documentation	None

Response to HCS 15

Comment ID:	HCS 15
Department:	Health and Community Services
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	Section 7.2.4 – Transportation Impact Study and Traffic Management Plan
Reviewer's Comment:	Appendix 2-C, section 3.1 includes the annual average daily traffic data for 2013. This may not be representative of current road traffic.
Response:	The data provided was supplied by the Newfoundland and Labrador Department of Transportation and Infrastructure and is the latest traffic counts available for the Project Area. Note that population census data for the Town of Stephenville for 2016 (6,623 pop) and 2021 (6,540 pop.) shows a net change of -1.3% in population.
Supporting Documentation	None



Response to HCS 16

Comment ID:	HCS 16
Department:	Health and Community Services
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	Section 7.2.5 – Public Participation Plan
Reviewer’s Comment:	Appendix 4-A provides the Public Participation Plan, including the creation of Community Liaison Committees and a Community Feedback and Response Protocol.
Response:	Thank you for confirmation that requirements were addressed in the EIS. No further response required.
Supporting Documentation	None

Response to HCS 17

Comment ID:	HCS 17
Department:	Health and Community Services
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	Section 8.0 – Residual Effects and Determination of Significance
Reviewer’s Comment:	Chapter 26 and Appendix 26-A include a summary of environmental effects, proposed mitigation efforts and residual adverse effects.
Response:	Thank you for confirmation that requirements were addressed in the EIS. No further response required.
Supporting Documentation	None



Response to HCS 18

Comment ID:	HCS 18
Department:	Health and Community Services
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	Section 9.0 – Assessment Summary and Conclusions
Reviewer’s Comment:	Chapter 26 summarizes the overall findings.
Response:	Thank you for confirmation that requirements were addressed in the EIS. No further response required.
Supporting Documentation	None

Response to HCS 19

Comment ID:	HCS 19
Department:	Health and Community Services
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	Section 10.0 – Public Consultation
Reviewer’s Comment:	Appendix 4-D summarizes the comments heard throughout public consultations, as well as references to the responses provided throughout the EIS.
Response:	Thank you for confirmation that requirements were addressed in the EIS. No further response required.
Supporting Documentation	None



Response to HCS 20

Comment ID:	HCS 20
Department:	Health and Community Services
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	Section 14.0 Commitments Made in the EIS
Reviewer’s Comment:	Appendix 26-A lists commitments made, but does not cross-reference to the section of the EIS where it has been made.
Response:	See Appendix HSC20-A (Updated Appendix 26-A from the Environmental Impact Statement).
Supporting Documentation	Appendix HSC20-A (Updated Appendix 26-A from the Environmental Impact Statement)



7.0 NL Department of Industry, Energy and Technology

7.1 Energy Branch

The Newfoundland and Labrador (NL) Department of Industry, Energy and Technology Municipal - Energy Branch has provided comments based on the review of the Project Environmental Impact Statement (EIS). The comments and World Energy GH₂'s (WEGH₂'s) responses are provided below.

Response to EB 1

Comment ID:	EB 1
Department:	Industry, Energy, and Technology
Branch/ Division:	Energy Branch
EIS Guidelines Reference (Where provided):	1.1 Name of the Undertaking
Reviewer's Comment:	Name of the Undertaking is included. No concerns from an IET (Energy) perspective.
Response:	Thank you for confirmation that requirements were addressed in the EIS. No further response required.
Supporting Documentation:	None

Response to EB 2

Comment ID:	EB 2
Department:	Industry, Energy, and Technology
Branch/ Division:	Energy Branch
EIS Guidelines Reference (Where provided):	1.2 The Proponent
Reviewer's Comment:	An overview of the Proponent is included. No concerns from an IET (Energy) perspective.
Response:	Thank you for confirmation that requirements were addressed in the EIS. No further response required.
Supporting Documentation:	None

Response to EB 3

Comment ID:	EB 3
Department:	Industry, Energy, and Technology
Branch/ Division:	Energy Branch
EIS Guidelines Reference (Where provided):	1.3 Overview of the Undertaking
Reviewer's Comment:	An overview of the Undertaking is included. No concerns from an IET (Energy) perspective.
Response:	Thank you for confirmation that requirements were addressed in the EIS. No further response required.
Supporting Documentation:	None

Response to EB 4

Comment ID:	EB 4
Department:	Industry, Energy, and Technology
Branch/ Division:	Energy Branch
EIS Guidelines Reference (Where provided):	2.1 Study Areas
Reviewer's Comment:	An appropriate overview of the Study Areas is included. The size and capacity of the two wind farms, the hydrogen production facility and the impact on the provincial grid as outlined in the EIS submission aligns with the proposal submitted by the proponent as part of the Call for Bids process. However, in its bid submission, WEGH2 included a third phase for potential wind farm development in two additional areas of lands northeast of the Anguille mountains and bounding the northern section of the Burgeo Highway. These additional areas are not included in this EIS submission. IET (Energy) has no concerns with those areas not being addressed in the current EIS.
Response:	Thank you for confirmation that requirements were addressed in the EIS. No further response required.
Supporting Documentation:	None

Response to EB 5

Comment ID:	EB 5
Department:	Industry, Energy, and Technology
Branch/ Division:	Energy Branch
EIS Guidelines Reference (Where provided):	2.2 Rationale for the Undertaking
Reviewer’s Comment:	<p>The EIS identifies the purpose of the Project as producing cost-effective green hydrogen/ ammonia for export to meet growing market demand, and supporting greenhouse gas emissions reductions and the global energy transition. These objectives broadly align with Government’s policy priorities.</p> <p>The EIS provides an introductory outline of the market for green hydrogen, including target geographic areas (United States and Europe) and sectors that are end-users of hydrogen. However, the market description could be more detailed. Citations for the claims would assist in further validation of the proponent’s remarks (i.e., stating that “most” European countries have recognized the need to import hydrogen/ammonia, whereas IET can only validate that a small number of European countries have recognized the need to import hydrogen/ammonia; evidence to support the existence of a “substantial supply-demand imbalance” in green hydrogen markets).</p> <p>The EIS states that WEGH2 is “actively involved in advanced offtake discussions.” IET suggests that specific companies or locations could be included. While the EIS identifies target markets as the United States and Europe, description of how the product will conform to the requirements of target markets may help further support the proponent’s business case noted in this section.</p> <p>IET suggests that more details about specific offtakers secured (e.g., in the form of a letter from an offtaker, MOU, or other “soft” commitments; how the product will conform to requirements of target markets and mandatory or voluntary certification schemes (e.g., European Union Renewable Energy Directive II); hydrogen/ammonia price projections) would help allay concerns of a potential risk to financial that may impact the projections for local economic and business impact from the project.</p>
Response:	While the reviewer indicates the Environmental Impact Statement (EIS) meets the requirement of the EIS Guideline, additional information is requested. However, given the commercial nature of these topics, WEGH2 prefers to further discussion be held in private with the Government of Newfoundland and Labrador or NL Hydro.
Supporting Documentation:	None

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Response to EB 6

Comment ID:	EB 6
Department:	Industry, Energy, and Technology
Branch/ Division:	Energy Branch
EIS Guidelines Reference (Where provided):	2.3 Project Description
Reviewer's Comment:	<p>Project description is included. No significant concerns from an IET (Energy) perspective.</p> <p>Of note, page 2.77 of the EIS notes that "WEGH2 is not currently seeking a non-firm energy rate other than the PUB scheduled rates. However, the anticipated benefits of potentially supplying electricity to the grid are detailed in Section 2.3.4.5." This section is not included in the EIS. Recent media reports indicate that this section was removed by the proponent prior to submitting the EIS.</p>
Response:	While the reviewer indicates the Environmental Impact Statement (EIS) meets the requirement of the EIS Guideline, additional information is requested. WEGH2 considers the request commercially sensitive and would prefer to address the request for additional information in private.
Supporting Documentation:	None

Response to EB 7

Comment ID:	EB 7
Department:	Industry, Energy, and Technology
Branch/ Division:	Energy Branch
EIS Guidelines Reference (Where provided):	2.3.1 General Layout
Reviewer's Comment:	General Layout is included. No concerns from an IET (Energy) perspective.
Response:	Thank you for confirmation that requirements were addressed in the EIS. No further response required.
Supporting Documentation:	None

Response to EB 8

Comment ID:	EB 8
Department:	Industry, Energy, and Technology
Branch/ Division:	Energy Branch
EIS Guidelines Reference (Where provided):	2.3.2 Construction
Reviewer’s Comment:	<p>Required Construction related information is included. No concerns from an IET (Energy) perspective.</p> <p>The EIS Guidelines, in section 2.3.2 (Construction), 2.3.3 (Operation and Maintenance), 2.3.4 (Decommissioning and Rehabilitation), all reference the requirement to commit to developing a Benefits Agreement, within the context of referring to the IPGS/WGE required Workforce and Employment Plan. IET’s comment on the proponent’s commitment is found below under section 7.2.6.</p>
Response:	Thank you for confirmation that requirements were addressed in the EIS. No further response required.
Supporting Documentation:	None

Response to EB 9

Comment ID:	EB 9
Department:	Industry, Energy, and Technology
Branch/ Division:	Energy Branch
EIS Guidelines Reference (Where provided):	Operation and Maintenance
Reviewer’s Comment:	<p>In general, although the EIS refers to various codes and standards that may be applicable to the project, it does not specify which codes and standards the project’s various components will be designed to meet and/or seek certification under.</p> <p>The EIS indicates that the project’s preferred alternative for hydrogen storage is engineered, above-ground vessels (as opposed to salt cavern storage). The preferred solution may avoid potential ambiguities/gaps with respect to the regulation of salt caverns under existing provincial legislation (e.g., existing legislation provides clear regulatory authority for exploiting salt deposits and rehabilitating mining sites, but authority for regulating the “void” used for storage caverns is less clearly defined). IET (Energy) defers to the Mines Branch with respect to this subject and to DGSNL with respect to any further comments with respect to codes and standards that may apply to above-ground storage vessels.</p>

Comment ID:	EB 9
	<p>IET’s (Energy) comments on EIS Guidelines Section 2.3.3 (u), market intentions for all end products, including wind energy, hydrogen and ammonia, are summarized above in EIS Guidelines Section 2.2 (Rationale for the Undertaking).</p> <p>Hydrogen codes and standards is an evolving area in which there has been significant activity in recent years, nationally and internationally. In Canada, a working group has been established under the Hydrogen Strategy for Canada, co-chaired by the Standards Council of Canada and Natural Resources Canada, to address barriers and propose solutions in the adoption and commercialization of hydrogen technologies and infrastructure.</p> <p>The National Research Council of Canada conducted a gap analysis to identify and assess gaps in existing codes and standards for hydrogen across the entire hydrogen value chain (https://nrc-publications.canada.ca/eng/view/ft/?id=6d14bc19-30b8-4c59-bb26-513dd983d3d7), and the working group is currently in the process of developing a roadmap aimed at prioritizing and addressing gaps that have been identified.</p> <p>As new and amended standards in this area may emerge over time, IET notes that a less prescriptive approach to codes and standards (as outlined in the EIS) may help ensure that the proponent can respond to new and emerging codes, standards, and best practices over the life of the project. However, IET defers to DGSNL as to whether this approach would be suitable and/or on any further comments DGSNL may have with respect to codes and standards that may be applicable to this project.</p> <p>IET defers to DGSNL and/or JPS on the applicability of existing fire and life safety-related codes and standards (e.g., fire codes, electrical codes) and to DGSNL on existing codes (e.g., the <i>Boiler, Pressure Vessel and Compressed Gas Regulations</i> under the <i>Public Safety Act</i>).</p> <p>The EIS Guidelines (2.3.3) require the EIS to include (among others):</p> <ul style="list-style-type: none"> i) proposed water source(s), estimated daily and annual volume of water quantity and water quality requirements, and any treatment needed to meet the required water quality for hydrogen and ammonia production; k) characterization of wastewater effluent from hydrogen and ammonia production, estimation of annual volume of effluent discharge, description of treatment required for effluent to meet regulatory standards for discharge, and a description of the receiving environment for wastewater discharged during hydrogen and ammonia production; and l) procedures for regular source water and wastewater quality and quantity monitoring; r) description of best management practices for the storage of waste dangerous goods/hazardous waste; <p>The EIS (section 2.6.3) notes that “Emissions and discharges (including wastewater) from the hydrogen / ammonia plant will be sampled and analyzed on a regularly scheduled basis. It is anticipated that the specific sampling frequency and analysis parameters will be laid out in a Certificate of Approval issued to the Project by the Industrial Compliance Section of NLDECC.” IET (Energy) defers to DGSNL and ECC on whether the proponent has included sufficient information on how it will control</p>

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	water quality or how it will dispose of waste water. However, the EIS notes, in relation to Muddy Pond (identified as a secondary source of industrial water), that “The pond sediments do show some detectable levels of hydrocarbons in the form of PHs and polycyclic aromatic hydrocarbons.” IET (Energy) is therefore interested in better understanding the source for such hydrocarbons, including whether there are natural oil seeps in the pond, and if so, how does changing the water levels and/or removal of water from the pond, effect the seeps or the concentration of hydrocarbons in the water? Is there a risk that this could pollute other areas? How will the proponent suitably dispose of any hydrocarbons skimmed from the water in order to produce demineralized water for hydrogen production? What are the predicted effects that turbines and hydrogen/ammonia plans have on natural oil seeps/aquifers (contamination, change in flow, land erosion etc.)
Response:	Thank you for those comments. We understand from anecdotal accounts of the former use of the area by the US Air Force, that there were several drums of unknown material removed from Noels Pond, which may have been the source of hydrocarbons in the ponds sediments. Contaminants will be removed from the water during the plan process and the resulting waste water will be tested prior to discharge to ensure compliance with applicable regulations.
Supporting Documentation:	None

Response to EB 10

Comment ID:	EB10
Department:	Industry, Energy, and Technology
Branch/ Division:	Energy Branch
EIS Guidelines Reference (Where provided):	2.3.4 Decommissioning and Rehabilitation
Reviewer’s Comment:	<p>IET (Energy) comments on this section are limited to the potential for “re-powering” end of life assets:</p> <p>With respect to decommissioning and rehabilitation, IET (Energy) notes that wind farm proponents also consider “re-powering” end-of-life wind assets (i.e., upgrading/replacing older equipment and components with newer, more efficient ones to take advantage of technological advancements that have taken place since the construction of the project).</p> <ul style="list-style-type: none"> • Re-powering may allow the project to expand its economic and employment benefits, while reducing the impacts on waste management facilities and local infrastructure that would typically be associated with fully decommissioning large-scale wind farms. • The concept of re-powering does not appear to be discussed in the proponent’s submission. While not explicitly required by the EIS guidelines, a wider consideration by the proponent of re-powering options as part of the overall

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	O&M strategy may allay any concerns with respect to adoption of new technology, competition with other providers, and extending the life of the project to the fullest extent possible.
Response:	Thank you. No response required.
Supporting Documentation:	None

Response to EB 11

Comment ID:	EB 11
Department:	Industry, Energy, and Technology
Branch/ Division:	Energy Branch
EIS Guidelines Reference (Where provided):	2.3.5 Regulatory Framework and Government Oversight
Reviewer’s Comment:	<p>The EIS Guidelines require the proponent to “provide a comprehensive list of permits and regulatory approvals (municipal, provincial, and federal) required for the undertaking.” (emphasis added) Table 1.4 presents a “List of Potential Permit/ Approval/ Licence Requirements for the Project”, which is noted as “preliminary”, and subject to confirmation and adjustment based on discussions with regulators. This seems reasonable, from an IET (Energy) perspective.</p> <p>With respect to the List, IET (Energy) notes the following:</p> <ul style="list-style-type: none"> • The acronym “NLDIET” is noted in the table as referring to TI, whereas the acronym is noted in the Table of Abbreviations as referring to IET. Accordingly, the proponent seems to confuse the responsible entity for some approvals/licenses. • The proponent has noted that “Development of Transmission Lines” requires approval from the Town of Stephenville. While it appears as though the <i>Town of Stephenville Development Regulations, 2014</i>, require municipal permitting for transmission lines, IET (Energy) notes the Board of Commissioners of Public Utilities is not referenced here. • The proponent notes that an electrical connection to the provincial grid requires approvals from NL Hydro/ Board of Commissioners of Public Utilities under the <i>Public Utilities Act</i> and the <i>Electrical Power Control Act, 1994</i>. • Notably, the proponent has omitted that the project will likely require an exemption from the Lieutenant-Governor in Council from subsection 14.1(2) of the <i>Electrical Power Control Act, 1994</i>, under the authority of subsection 14.1(7) of the Act. • IET (Energy) defers to EDU on any required regulatory approvals related to the partnership between the DOB Academy and Qalipu First Nation (e.g., under the <i>Private Training Institutions Act</i> and Regulations).

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	<p>EIS Guidelines 2.3.5 a) and 2.3.5 d)</p> <ul style="list-style-type: none"> • The EIS accurately outlines the Crown Land Call for Land Nominations and Call for Bids processes. WEGH2 has been issued a Wind Application Recommendation Letter, providing them the exclusive right to pursue their project through the Crown lands application process on their selected Crown land. • The Project supports the objectives of the Minister’s mandate letter, including advancing efforts to achieve net zero by 2050, advancing Newfoundland and Labrador’s status as a Clean Energy Centre of Excellence, and promoting Newfoundland and Labrador as the global destination of choice for green investment. • The description of the Project is aligned with elements of the Vision of IET’s Renewable Energy Plan (REP), including enhanced training and supports available for residents to participate in the renewable energy industry (via partnership with DOB Academy and Qalipu First Nation) and enhancing collaboration and relationships throughout the province, including between Indigenous governments and organizations, industry, and stakeholders. As an industry-led project, it cannot support specific REP actions. • The Project may support the objectives of the Joint Declaration of Intent on cooperation in the field of green hydrogen and hydrogen technologies between the City of Hamburg and the Government of Newfoundland and Labrador, including driving the scaling of the domestic green hydrogen economy and encouraging the development and expansion of renewable energy for the production of green hydrogen. • The Project may support the Memorandum of Understanding (MOU) on cooperation in the field of green hydrogen and market opportunities between the Port of Rotterdam and the Government of Newfoundland and Labrador, including working towards the development of international supply chains between Newfoundland and Labrador and the Port of Rotterdam for green hydrogen and its derivatives. • The extent that the Project supports directly the Declaration of Intent with Hamburg and the MOU with the Port of Rotterdam would be contingent on whether products produced by the Project are shipped to Hamburg and Rotterdam and used by customers supported by those regions. See further comments above on Chapter 2, Section 2.2 (Rationale for the Undertaking). <p>EIS Guidelines 2.3.5 b) and 2.3.5 c)</p> <ul style="list-style-type: none"> • In general, although the EIS refers to various codes and standards that may be applicable to the project, it does not specify which codes and standards the project’s various components will be designed to meet and/or seek certification under. In addition, IET notes that the List of Potential Codes/Standards Applicable to the Project (Table 2.9) does not include any items pertaining to wind projects or locations of wind turbines. However, IET defers to DGSNL on matters relating to standards and codes. • IET is not aware of any regulations or codes that have been adopted in Newfoundland and Labrador that pertain specifically to wind turbine foundations (and would defer to MAPA, DGSNL, and/or TI on any relevant provisions of the National Building Code of Canada or the provincial <i>Building Standards Act</i>).

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	<ul style="list-style-type: none"> • The Standard Environmental Protection Procedures, Best Management Practices, and Mitigation Measures outlined in Table 2.10 (ID# 132) indicates that the project will be designed and constructed to meet applicable engineering codes, standards and best management practices (e.g., [...] the Canadian Standards Association Guide to Canadian Wind Turbine Codes and Standards, [...]). However, this guide appears to merely provide an overview of various codes and standards that were available at the time the guide was developed in 2008; it does not appear to be a code or standard in its own right (https://www.csagroup.org/documents/codes-and-standards/standards/energy/CSAGuidetoCanadianWindTurbineCodes.pdf). IET defers to MAPA, DGSNL, and/or TI for further comment. • Hydrogen codes and standards is an evolving area in which there has been significant activity in recent years, nationally and internationally. In Canada, a working group has been established under the Hydrogen Strategy for Canada, co-chaired by the Standards Council of Canada and Natural Resources Canada, to address barriers and propose solutions in the adoption and commercialization of hydrogen technologies and infrastructure. • The National Research Council of Canada conducted a gap analysis to identify and assess gaps in existing codes and standards for hydrogen across the entire hydrogen value chain (https://nrc-publications.canada.ca/eng/view/ft/?id=6d14bc19-30b8-4c59-bb26-513dd983d3d7), and the working group is currently in the process of developing a roadmap aimed at prioritizing and addressing gaps that have been identified. • As new and amended standards in this area may emerge over time, a less prescriptive approach to codes and standards (as outlined in the EIS) may help ensure that the proponent can respond to new and emerging codes, standards, and best practices over the life of the project. However, IET defers to DGSNL as to whether this approach would be suitable and/or on any further comments DGSNL may have with respect to codes and standards that may be applicable to this project. • IET (Energy) defers to DGSNL and/or JPS on the applicability of existing fire and life safety- related codes and standards (e.g., fire codes, electrical codes) and to DGSNL on existing codes (e.g., the <i>Boiler, Pressure Vessel and Compressed Gas Regulations</i> under the <i>Public Safety Act</i>).
Response:	Thank you for the comments. No response required.
Supporting Documentation:	None

Response to EB 12

Comment ID:	EB 12
Department:	Industry, Energy, and Technology
Branch/ Division:	Energy Branch
EIS Guidelines Reference (Where provided):	3.1 Alternatives to the Undertaking
Reviewer’s Comment:	<p>No concerns from an IET (Energy) perspective.</p> <p>The EIS appropriately notes several market and regulatory circumstances that have influenced the preferred alternative, including forecasted global market demand for green hydrogen, federal policies and investments in support of green hydrogen, and provincial policy direction to develop a green hydrogen industry in Newfoundland and Labrador.</p> <p>The Proponent’s preferred alternative to produce green hydrogen is aligned with the provincial REP’s objectives to develop green hydrogen/ammonia opportunities within the province, and to pursue export opportunities, as well as a commitment in the Minister’s mandate letter to consider new export energy sector development including wind, hydrogen, and other opportunities.</p>
Response:	Thank you for confirmation that requirements were addressed in the EIS. No further response required.
Supporting Documentation	None

Response to EB 13

Comment ID:	EB 13
Department:	Industry, Energy, and Technology
Branch/ Division:	Energy Branch
EIS Guidelines Reference (Where provided):	3.2 Alternative Methods of Carrying out the Undertaking
Reviewer’s Comment:	<p>The EIS outlines three alternative sources of energy for producing green hydrogen: 1) connecting to the existing provincial electricity grid for all power needs (i.e., primarily hydroelectricity); 2) developing offshore wind farms; and, 3) developing onshore wind farms (preferred).</p> <p>The EIS does not explore alternative renewable energy sources (e.g., solar photovoltaic, micro- hydropower, biomass, geothermal, or wave/tidal), some of which may become more cost- competitive with wind for producing green hydrogen in the future, and why they were excluded by the proponent. However, the proponent’s focus on the Province’s high-value wind resources is consistent with provincial policy</p>

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	<p>direction and actions, including a commitment in the provincial REP to develop a Hydrogen Development Action Plan, and the recently-completed Crown Lands Call for Bids for Wind Energy Projects. Accordingly, IET (Energy) has no concerns.</p> <p>While there is limited discussion regarding the feasibility of the two considered alternatives (i.e., insufficient surplus generation capacity on the grid and higher expenditures and additional complexities for developing offshore wind farms), IET (Energy) has no concerns with these assessments. The grid does not have sufficient excess capacity to supply all of the power needs for this project, and offshore wind farms have outstanding regulatory and jurisdictional issues that would likely negatively impact project timelines to include offshore wind energy in the project scope.</p> <p>The EIS considers two general size ranges of conventional horizontal axis wind turbines (i.e., smaller models of 3.4 to 5.0 megawatts and larger turbines of 6.6 megawatts or above), as well as vortex bladeless wind turbines.</p> <p>While the EIS does not discuss other alternative turbine designs (e.g., vertical axis wind turbines), and there is limited discussion on the feasibility of bladeless turbines, IET notes that the proposed alternatives are consistent with general market trends in which companies are deploying increasingly large horizontal axis turbines to maximize efficiency and minimize required surface area occupied by turbines. Accordingly, IET (Energy) has no concerns.</p> <p>On page 3.8 in section 3.2.3.1 the EIS submission states that “In addition, pending further land bid consideration the Government of NL removed the Lewis Hill site from the Crown Land Bid process.” During the Call for Land Nominations, no lands north of Fox Island River (including the Lewis Hills) were nominated for an eligible project. As such, this area was not included in the Call for Bids Area contained in the Wind Land Reserve. The Proponent’s Call for Bids submission did not include the Lewis Hills and the Crown land requested was south of Fox Island River.</p> <p>Government did remove Lewis Hills from the Wind Land Reserve. There is some rationale provided in the EIS for not pursuing Lewis Hills so this should not impact the EIS submission.</p>
Response:	Thank you. No response required.
Supporting Documentation	None

Response to EB 14

Comment ID:	EB 14
Department:	Industry, Energy, and Technology
Branch/ Division:	Energy Branch
EIS Guidelines Reference (Where provided):	4.1 Key Issues
Reviewer’s Comment:	The majority of key issues identified in the EIS document, as further elaborated on in the valued environmental component specific chapters (i.e., Chapters 6-22), are outside IET (energy)’s mandate/expertise. Comments are included, where appropriate.
Response:	Thank you. No response required.
Supporting Documentation:	None

Response to EB 15

Comment ID:	EB15
Department:	Industry, Energy, and Technology
Branch/ Division:	Energy Branch
EIS Guidelines Reference (Where provided):	4.2 Existing Environment
Reviewer’s Comment:	The EIS describes existing electrical infrastructure in the project area, and while it does not provide significant detail on the impact of the project on electrical infrastructure, it indicates there will be minimal system impacts and it has initiated the appropriate studies with NL Hydro to determine. This is sufficient to meet the EIS guidelines requirement (under 4.1) to describe the “effects of the Project on existing electrical infrastructure” as the full impacts cannot be fully understood or addressed until after the conclusion of the NL Hydro studies.
Response:	Thank you for confirmation that requirements were addressed in the EIS. No further response required.
Supporting Documentation:	None

Response to EB 16

Comment ID:	EB 16
Department:	Industry, Energy, and Technology
Branch/ Division:	Energy Branch
EIS Guidelines Reference (Where provided):	4.2.1 Atmospheric Environment
Reviewer's Comment:	N/A
Response:	No response required.
Supporting Documentation	None

Response to EB 17

Comment ID:	EB 17
Department:	Industry, Energy, and Technology
Branch/ Division:	Energy Branch
EIS Guidelines Reference (Where provided):	4.2.2 Aquatic Environment
Reviewer's Comment:	N/A
Response:	No response required.
Supporting Documentation	None

Response to EB 18

Comment ID:	EB 18
Department:	Industry, Energy, and Technology
Branch/ Division:	Energy Branch
EIS Guidelines Reference (Where provided):	4.2.3 Terrestrial Environment
Reviewer’s Comment:	<p>In relation to the WERAC proposed Reserves, section 16.2.2 of the EIS notes “If no significant mineral or petroleum discovery is made at a transitional reserve site within that 10-year timeframe, the site will transition into a protected wilderness or ecological reserve (WERAC 2020)”. IET understands that Government has approved ECC/WERAC to move forward with site-specific consultations on each of the proposed protected areas, in order to inform “what protected areas are established, final boundaries, and how areas are managed.” (emphasis added - https://www.gov.nl.ca/releases/2023/ecc/0525n02/) While WERAC has recommended the ten-year transitional timeframe, the proponent seems to have misinterpreted the recommendation as Government policy. Whether a reserve will be established, and how they will be managed/ what activities will be permitted to occur therein, remains to be determined.</p> <p>Petroleum exploration and development is a long process and just because an area hasn’t been explored/developed, it doesn’t mean the area won’t be. Further, the initial petroleum lease timeline is 10 years, as per the <i>Petroleum Regulations</i> this can be extended in increments of 5 years multiple times at the Minister’s discretion.</p>
Response:	Thank you for the clarification. No response required.
Supporting Documentation:	None

Response to EB 19

Comment ID:	EB 19
Department:	Industry, Energy, and Technology
Branch/ Division:	Energy Branch
EIS Guidelines Reference (Where provided):	4.2.4 Land and Resource Use
Reviewer’s Comment:	<p>Section 4.2.4 (Land and Resource Use) of the EIS Guidelines required the proponent to describe relevant land and resource use within the study area.</p> <p>The EIS describes existing electrical infrastructure including the HVdc infrastructure of the Maritime Link.</p>

<p>Comment ID:</p>	<p>EB 19</p>
	<p>While the Table of Concordance makes reference to section 10.5.2, the information concerning land tenure under the <i>Petroleum and Natural Gas Act</i>, is located in section 20.5.2.</p> <p>Section 11.2.2.5 notes “Western Newfoundland is considered an area of low activity for the petroleum industry. There is currently only one active exploration licence (EL-1070) in western Newfoundland; Shoal Point Energy Ltd. Is the licence operator. The licence covers onshore and offshore lands and overlaps with the LAA off the north coast of the Port au Port Peninsula.”</p> <ul style="list-style-type: none"> • The above-noted statement is inaccurate as there are two exploration permits and one production lease in the onshore portion of Western NL and one offshore exploration licence in Western NL. The two onshore exploration permits do not overlap with the project, while the onshore production lease does. <p>With respect to the onshore production lease held by Enegi Oil Inc., the EIS notes (20.5.2.1) that IET requested that the proponent “relocate turbines 1 – 9 in the Port au Port Wind Farm as they are currently situated on Production Lease 2002-01(A) to Enegi Oil Inc./ Geston Resources Ltd.” The EIS further notes “The layout of the turbines has subsequently been revised, however turbines 1 – 7 currently remain within the production lease. WEGH2 will work towards final siting of these turbines to avoid conflict and interference with the production lease during the detailed design.”</p> <ul style="list-style-type: none"> • IET confirms there is overlap between the undertaking and PL2002-01(A), which has an expiry date of August 11, 2027; further extensions could be permitted. The PL in the Cape St. George area of the Port au Port Peninsula is a proven hydrocarbon Anticosti basin. • It is unclear, where WEGH2 received information that Geston owns a portion of the lease, as Enegi is currently the 100% owner. <p>Section 20.2.2.2 notes “One onshore well, the Garden Hill Port au Port #1 well on the Port au Port Peninsula, was successful in achieving limited hydrocarbon production (Hicks and Owens 2015). One production lease, owned by Enegi Oil Ltd. / Geston Resources Ltd., occupies approximately 19.5 km² on the western tip of Port au Port Peninsula (NLDIET 2023b); the Project Area overlaps approximately 5.3 km² of this production lease area (Figure 20.6; Stantec 2023).”</p> <ul style="list-style-type: none"> • The onshore Shoal Point Well is not considered. • There may only be a 5.3 km² overlap, but there will need to be a sufficient set-back between any wind turbines and associated oil and gas infrastructure, to ensure no negative impacts. Section 39 in the <i>Petroleum Regulations</i> confers to the lessee among other things, the exclusive right to develop, and produce from, a petroleum pool in the lease area. This means that Enegi’s rights cannot be impeded on the current lease (PL-2002-1(A) – expiry August 11, 2027 but could be extended again). This, however, does not mean a shared-use plan could not be negotiated between WEGH2 and Enegi Oil Inc but it must be within the parameters of Enegi’s rights. <p>See further comments below under section 7.1 (Mitigations) for how the above-noted issues should be addressed by the proponent.</p> <p>Section 20.5.2 further notes that “Except at turbine tower locations and subject to clearance or set-back restrictions and agreement on common use, mining, quarrying, mineral, and petroleum exploration activities will be able to occur adjacent or near the Project Area throughout Project operation. Project-related changes in access would likewise be maintained throughout the Project life.”</p>

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Comment ID:	EB 19
Response:	Thank you for the clarification. During detailed design, WEGH2 commits to work with the lease holder of Production Lease (2002-01(A) Energi Oil Inc. (“Energi”), towards final siting of these wind turbines to avoid conflict and interference with Energi’s planned development of the production lease.
Supporting Documentation:	None

Response to EB 20

Comment ID:	EB 20
Department:	Industry, Energy, and Technology
Branch/ Division:	Energy Branch
EIS Guidelines Reference (Where provided):	4.2.5 Heritage and Cultural Resources
Reviewer’s Comment:	N/A
Response:	No response required.
Supporting Documentation:	None

Response to EB 21

Comment ID:	EB 21
Department:	Industry, Energy, and Technology
Branch/ Division:	Energy Branch
EIS Guidelines Reference (Where provided):	4.2.6 Communities
Reviewer’s Comment:	N/A
Response:	No response required.
Supporting Documentation:	None

Response to EB 22

Comment ID:	EB 22
Department:	Industry, Energy, and Technology
Branch/ Division:	Energy Branch
EIS Guidelines Reference (Where provided):	4.2.7 Economy, Employment and Business
Reviewer’s Comment:	<p>EIS Guidelines 4.2.7 d)</p> <ul style="list-style-type: none"> • The EIS notes that WEGH2 has contracted Jupia Consultants to develop an economic report including a labour capacity/demand study to inform a gap analysis outlining what occupations and skills will need to be developed and consider how the Province can maximize workforce and income benefits of the project by addressing workforce demand. • This study may confirm results of the gap analysis that will be undertaken under the econext’s Clean Energy Initiative Project with respect to the renewable energy labour market in NL. <p>IET (Energy) notes that, while the EIS highlights the positive aspects of the “boomtown” impact on the economy, employment, and business, a fuller discussion of the potential negative impacts and proposed mitigations (e.g., decreased employment as project moves from the construction phase to the operations and maintenance phase) may help allay potential community concerns about long-term job sustainability; however, IET defers to IPGS on issues on labour capacity and employment.</p>
Response:	Thank you. No response required.
Supporting Documentation:	None

Response to EB 23

Comment ID:	EB 23
Department:	Industry, Energy, and Technology
Branch/ Division:	Energy Branch
EIS Guidelines Reference (Where provided):	4.3 Baseline Studies
Reviewer’s Comment:	IET (Energy) has limited comments on the valued environmental component specific chapters (i.e., Chapters 6-22), as they address a range of environmental related impacts that are outside IET (energy)’s mandate/expertise. Comments are included, where appropriate.
Response:	Thank you. No response required.
Supporting Documentation:	None

Response to EB 24

Comment ID:	EB 24
Department:	Industry, Energy, and Technology
Branch/ Division:	Energy Branch
EIS Guidelines Reference (Where provided):	4.3.1 Atmospheric Environment
Reviewer’s Comment:	<p>The EIS Guidelines (4.3.1 (c)(viii)) requires the proponent to include the following: Vibration from the operation of wind turbines may have an effect on the receiving environment, including human and animal receptors. The baseline study shall assess and report on ambient vibrations at each of the wind energy generation sites, and shall provide the distance of the nearest wind turbines to, at a minimum, the following features: ...viii. existing electrical infrastructure”</p> <p>The Table of concordance notes this information is found in BSA-1, Section 3.3; Figure 2.1. This is incorrect and BSA 1 does not provide the distance of turbine from existing electrical infrastructure.</p>
Response:	Table EB 24.1 lists the distances of turbines to existing electrical infrastructure.
Supporting Documentation	Table EB 24.1 Distances of Existing Electrical Infrastructure to Project Components

Table EB 24.1 Distances of Existing Electrical Infrastructure to Project Components

Type	Location	Distance to Nearest Turbine			Distance to 230 kV T-Line (m)	Distance to Plant (m)
		Turbine ID	Wind Farm	Metres		
Substation	Bottom Brook Substation	181	Port_au_Port	28,474	1,226	18,229
Generator	NL Hydro 50 MW Diesel Combustion Stephenville	157	Port_au_Port	14,568	469	104
Substation	Stephenville Crossing Substation	157	Port_au_Port	19,037	1,242	4,254
Substation	Route 460 (138 kV)	157	Port_au_Port	10,839	275	3,910
Generator	Lookout Brook Hydro Plant (5.8 MW)	156	Port_au_Port	39,207	11,815	23,706
Substation	Berry Head (69 kV)	156	Port_au_Port	8,201	285	12,269
Substation	Gallant Street (69 kV)	156	Port_au_Port	11,009	989	5,355
Substation	Local substation connected to Lookout Brook	156	Port_au_Port	30,609	894	15,104
Substation	St. George's Substation	156	Port_au_Port	27,393	1,663	10,510
Substation	Atlantic Minerals (69 kV)	60	Port_au_Port	3,134	4,840	28,152
Substation	Piccadilly	82	Port_au_Port	1,417	32	36,143
Substation	Doyles Substation	49	Codroy	16,077	31,838	94,545

Response to EB 25

Comment ID:	EB 25
Department:	Industry, Energy, and Technology
Branch/ Division:	Energy Branch
EIS Guidelines Reference (Where provided):	4.3.2 Aquatic Environment
Reviewer’s Comment:	<p>Section 11.2.2.5 of the EIS (as well as section 6.3.6.7 of BSA-2) notes that “Western Newfoundland is considered an area of low activity for the petroleum industry (C-NLOPB 2023). There is only one active exploration licence (EL-1070) in Western Newfoundland, with Shoal Point Energy Ltd. being the licence representative. It is located within the LAA off the north coast of the Port au Port Peninsula.”</p> <p>The EL is located offshore but the wells were drilled onshore to offshore therefore the wellheads are located onshore within the RAA but not within the LAA.</p>
Response:	Thank you. No response required.
Supporting Documentation	None

Response to EB 26

Comment ID:	EB 26
Department:	Industry, Energy, and Technology
Branch/ Division:	Energy Branch
EIS Guidelines Reference (Where provided):	4.3.3 Terrestrial Environment
Reviewer’s Comment:	N/A
Response:	No response required.
Supporting Documentation	None

Response to EB 27

Comment ID:	EB 27
Department:	Industry, Energy, and Technology
Branch/ Division:	Energy Branch
EIS Guidelines Reference (Where provided):	4.3.4 Land and Resource Use
Reviewer's Comment:	<p>For comments on Chapter 2, Section 2.6, see EIS Guidelines 2.3.3 Operations and Maintenance.</p> <p>a) The Socio-Economic Environment and Land and Resource Use Baseline Study (BSA-4) addresses existing capital spending in utility industry. It also describes existing electrical infrastructure including the Maritime Link. However, it does not mention the Labrador Island Link (LIL) and whether the project is in close proximity to a portion of the LIL.</p> <p>b) As required by the EIS guidelines, the EIS does not detail distance of wind turbines from electrical infrastructure. The EIS does not demonstrate that access to the energy required from the electrical grid has been secured from NL hydro but notes it has filed applications for service from NL Hydro. The baseline study does not provide detailed description of the components of the province's existing electrical transmission infrastructure in the study area. The EIS lacks information on interconnection to the province's electrical grid and the potential need for further development of existing facilities to integrate the Project.</p> <p>The EIS Lacks geographical footprint and routing to assess proximity to existing infrastructure and any consequential risk of interference, including but not limited to the province's high voltage direct current (HVdc) infrastructure.</p> <p>The comments above are included in the interest of completing a thorough assessment of the EIS</p> <p>c) BSA-4 (Section 4.3.3.1) – provides information on PL2002-01(A). However, the information about the Enegi/Gestion Production Lease is inaccurate, as Enegi has 100% ownership.</p> <ul style="list-style-type: none"> • There is an overlap of 5.3 km² between an existing production lease and where the proponent would like to put wind turbines. <p>d) BAS-4 (section 4.3.3.1) notes "Vulcan Minerals, a Newfoundland based company, advanced a series of exploratory wells between 1996 and 2009, confirming earlier findings from the Department of Mines and Energy (Hinchev et al 214)."</p> <ul style="list-style-type: none"> • The last Vulcan Minerals well was in 2009, however, Vulcan/Investcan joint venture drilled until 2011.

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Response:	<p>e) The Project Area is separated by quite a distance from the Labrador Island Link (LIL), which is greater than 135 km away to the northeast at its closest point.</p> <p>f) There is one existing substation (i.e., Piccadilly) within the Project Area, specifically the Port au Port Wind Farm. Turbine #82 is located 1.4 km from the existing substation. Table EB 24.1 presents distances from the nearest turbine, proposed 230 kV transmission line and proposed hydrogen/ammonia plant to existing electrical infrastructure (i.e., substations, generators). Other existing electrical infrastructure facilities listed in Table EB24.1 are not in the Project Area.</p> <p>Approximately 36 km of existing transmission lines are in the Project Area (Port au Port Wind Farm to the Plant Facility). The proposed 230 kV transmission line will parallel existing transmission lines on a shared right-of-way for approximately 5.6 km. The Project Area for the Codroy Wind Farm to Plant Facility has approximately 87 km of existing transmission lines. The proposed 230 kV transmission line parallels other existing transmission lines on shared right-of-way, including the Maritime Link, for approximately 74 km.</p> <p>g) The factual errors with respect Enegi/Gestion Production Lease ownership status being 100% and Vulcan/Investcan Joint Venture undertaking drilling until 2011 are noted.</p> <p>WEGH2 acknowledges IETs confirmation of overlap between the proposed undertaking and PL2002-01(A), a proven hydrocarbon resource from the Anticosti basin. It is noted that Enegi has 100% ownership of the aforementioned lease.</p> <p>h) WEGH2 further notes that Vulcan/Investcan Joint Venture drilled until 2011.</p>
Supporting Documentation	Table EB24.1 Distances of Existing Electrical Infrastructure to Project Components

Response to EB 28

Comment ID:	EB 28
Department:	Industry, Energy, and Technology
Branch/ Division:	Energy Branch
EIS Guidelines Reference (Where provided):	5.0 Data Gaps
Reviewer’s Comment:	N/A
Response:	No response required.
Supporting Documentation:	None

Response to EB 29

Comment ID:	EB 29
Department:	Industry, Energy, and Technology
Branch/ Division:	Energy Branch
EIS Guidelines Reference (Where provided):	6.1 Predicted Future Condition of the Environmental if the Undertaking Does Not Proceed
Reviewer’s Comment:	IET (Energy) has no comments on the-specific Chapters (i.e., Chapters 6-22), or the baseline studies, which cover a wide range of environmental impacts in areas outside of IET (Energy’s) mandate/expertise. Comments are included below, where appropriate.
Response:	Thank you. No response required.
Supporting Documentation:	None

Response to EB 30

Comment ID:	EB 30
Department:	Industry, Energy, and Technology
Branch/ Division:	Energy Branch
EIS Guidelines Reference (Where provided):	6.2 Predicted Environmental Effects of the Undertaking
Reviewer’s Comment:	<p>Section 6.2 of the EIS Guidelines requires the proponent to identify the effects of the project on existing electrical infrastructure and implications for the overall provincial and regionally interconnected transmission system, including in five specific areas. The Table of Concordance notes that this information is found in Chapter 2, section 2.6.2 of the EIS. However, minimal information is included to directly address these requirements.</p> <p>While the EIS does not detail the anticipated impact of the project on electrical infrastructure and residents, it indicates “WEGH2 has submitted an application for 10 MW firm and 145 MW non- firm. This will involve an overall system model that allows accurate simulations of the effect of the Project on the NL Hydro grid and optimization of the Project’s major electrical equipment ratings.”</p>
Response:	Under WEGH2’s Large Customer Interconnection Request Form, dated 24-Mar-2023, made to NL Hydro for the above stated energy requirements, NL Hydro has initiated a Project System Impact Study (“SIS”) on the proposed interconnection option, including firm and non-firm energy request. As defined by NL Hydro, the objective of this SIS is to determine a preliminary electrical system interconnection design and estimates of the cost and schedule for its engineering and construction. Following WEGH2’s acceptance of the SIS results, pursuant to the provisions of

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	<p>industrial customer interconnection protocols, NL Hydro will then initiate engineering and all regulatory approvals required to facilitate the interconnection implementation.</p> <p>WEGH2 commits to adhere to NL Hydro’s SIS, while accepting that all interconnection and energy supply cost will subject to the review and approval of the Board of Commissioners of Public Utilities pursuant to the <i>Hydro Corporation Act, 2007</i>.</p> <p>WEGH2 notes that all NL Hydro costs for completion of the SIS are born by WEGH2.</p> <p>Please refer to Appendix EB30-A for an overview of the System Impact Study (SIS) process.</p>
Supporting Documentation:	Appendix EB30-A System Impact Study Process Overview

Response to EB 31

Comment ID:	EB 31
Department:	Industry, Energy, and Technology
Branch/ Division:	Energy Branch
EIS Guidelines Reference (Where provided):	6.3 Accidents and Malfunctions
Reviewer’s Comment:	Section 6.3 of the EIS Guidelines requires the proponent to assess the likelihood of occurrence and consequence severity of various types of accidents and malfunctions, including for “energy generation/transmission failure” Table 24.2 discussed and addressed generation/transmission failure.
Response:	Thank you. No response required.
Supporting Documentation:	None

Response to EB 32

Comment ID:	EB32
Department:	Industry, Energy, and Technology
Branch/ Division:	Energy Branch
EIS Guidelines Reference (Where provided):	6.4 Cumulative Environmental Effects
Reviewer’s Comment:	N/A
Response:	No response required.
Supporting Documentation:	None

Response to EB 33

Comment ID:	EB33
Department:	Industry, Energy, and Technology
Branch/ Division:	Energy Branch
EIS Guidelines Reference (Where provided):	6.5 Effects of the Environment on the Project
Reviewer’s Comment:	N/A
Response:	No response required.
Supporting Documentation:	None

Response to EB 34

Comment ID:	EB 34
Department:	Industry, Energy, and Technology
Branch/ Division:	Energy Branch
EIS Guidelines Reference (Where provided):	7.1 Mitigations
Reviewer’s Comment:	<p>EIS Guidelines 7.1 (g)(i),(ii), and (iii)</p> <p>The proponent’s table of concordance notes that information concerning the requirements in 7.1 (g)(i), (ii) and (iii) are included in section 20.4 of the EIS. However, the information that section simply outlines mitigations in a number of areas, but does not include: “ g) The EIS shall describe measures that will be undertaken to mitigate the effects of the Project on existing electrical infrastructure and the potential implications for the overall provincial and regionally interconnected transmission system, including but not limited to the following: i. effects on cost and access to electricity and other goods and services for provincial residents; ii. details regarding the geographical footprint and routing to assess proximity to existing infrastructure and any consequential risk of interference, including but not limited to the province’s high voltage direct current HVdc infrastructure; and iii. system impact studies to determine the reliability and operating effects of the Project on the existing electrical system, particularly the newly constructed HVdc facilities of the Labrador- Island Link and Maritime Link”</p> <p>IET recognizes this information, particularly that required by g(i) and (iii) will be difficult to include as the full impacts cannot be fully understood or addressed until after the conclusion of the NL Hydro studies, however the proponent could more explicitly address the mitigations listed.</p> <p>EIS Guidelines 7.1 (g)(iv), and (v)</p> <p>The proponent’s table of concordance notes that information concerning the requirements in 7.1 (g)(iv) and (v) are included in section 2.12 of the EIS. However, the information that section simply outlines mitigations in a number of areas, but does not include: “iv. details on when the Project would require access to transmission resources, including any curtailment considerations and the effect on other customers, both during the period before the wind farm is operational and over the longer term; and v. details on when the intermittent renewable energy resource will be available for supply to the energy grid when not used for production of hydrogen.” IET recognizes this information will be difficult to include as the full impacts cannot be fully understood or addressed until after the conclusion of the NL Hydro studies, however the proponent could more explicitly address the mitigations listed.</p> <p>EIS Guidelines 7.1(f)(ii)</p> <p>The proponent’s table of concordance notes that information concerning the measures that will be taken to mitigate potential land use and tenure conflicts, including under the <i>Petroleum and Natural Gas Act</i>, is available in Chapter 16, section 16.4. However, information on how the proponent will “mitigate potential land use and tenure conflicts” is not located in this section, nor in Chapter 20, other</p>

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	than to note that “WEGH2 will work towards final siting of these turbines to avoid conflict and interference with the production lease during the detailed design.” Mitigations are also not identified for the subsea transmission cable.
Response:	<p>With reference to the Project’s impact on the Provincial electrical grid, please see WEGH2’s response to EB 30.</p> <p>As it relates to Production Lease 2002-01(A), please see WEGH2’s response to EB 19.</p> <p>As it relates to the submarine transmission cable, should WEGH2 elect this secondary option for transmission of the generated electrical power from the Port au Port Peninsula, in lieu of the overhead line crossing, WEGH2 commits during detailed design, to work with the offshore exploration leaseholder to towards selecting a final routing of the submarine cable that avoids conflict and interference with the leaseholder’s planned exploration program.</p>
Supporting Documentation:	None

Response to EB 35

Comment ID:	EB35
Department:	Industry, Energy, and Technology
Branch/ Division:	Energy Branch
EIS Guidelines Reference (Where provided):	7.2 Plans
Reviewer’s Comment:	N/A
Response:	No response required.
Supporting Documentation:	None

Response to EB 36

Comment ID:	EB36
Department:	Industry, Energy, and Technology
Branch/ Division:	Energy Branch
EIS Guidelines Reference (Where provided):	7.2.1 Emergency Response/Contingency Plan
Reviewer's Comment:	Section 7.2.1 of the EIS Guidelines requires the proponent to include an Emergency Response/Contingency Plan outlining procedures to respond to accidents, malfunctions and emergencies, including but not limited to the following: "h) energy generation/transmission failure including the buried portion of the transmission line;" The section also requires the plan to establish an emergency communication strategy with those potentially affected and must describe the capacity of the proponent/nearby communities to respond each type of accident, malfunction, or emergency, including the availability required response equipment and training. However, the ERP is limited to noting that in the event of an "energy generation/transmission failure," then the site would be safely shut down, and that the anticipated outage timeframe will define next steps. The ERP does not include any information concerning how it would communicate with NL Hydro in such a situation.
Response:	<p>In the event of an energy generation / transmission failure, WEGH2's protocol would be to contact the Newfoundland and Labrador System Operator ("NLSO") or NL Hydro via the to be established protocol. Presently, NL Hydro is undertaking a System Impact Study in order to evaluate the engineering and operational impacts of the proposed interconnection of Project Nujio'qonik's electrical grid with the NL Hydro grid.</p> <p>On the topic of notification during outages, NL Hydro has advised that they do not anticipate that NL Hydro or the NLSO will need notice from WEGH2 of outages behind the interconnection point, rather Hydro will just need to know what energy demand interchange (and associated parameters) should be expected with its grid at all times. NL Hydro advises "that it is typical that interchange communications about that will flow through our Key Accounts Specialist on a planning/longer term horizon, while changes to grid interchange in real time and/or on an unplanned basis will be automatically controlled and communicated with direct SCADA connections to the NLSO / Energy Control Centre. More precisely defined communication protocols are expected to evolve as we learn more through the planning stage, as well as early operation, of WEGH2's proposed project." As the System Impact Study is completed, and power purchase agreements begin to form, WEGH2 and NL Hydro will develop new processes to coordinate the respective operations, including emergency response communication protocols.</p>
Supporting Documentation:	None

Response to EB 37

Comment ID:	EB37
Department:	Industry, Energy, and Technology
Branch/ Division:	Energy Branch
EIS Guidelines Reference (Where provided):	7.2.2 Waste Management Plan
Reviewer's Comment:	N/A
Response:	No response required.
Supporting Documentation:	None

Response to EB 38

Comment ID:	EB38
Department:	Industry, Energy, and Technology
Branch/ Division:	Energy Branch
EIS Guidelines Reference (Where provided):	7.2.3 Hazardous Materials Response and Training Plan
Reviewer's Comment:	N/A
Response:	No response required.
Supporting Documentation:	None

Response to EB 39

Comment ID:	EB39
Department:	Industry, Energy, and Technology
Branch/ Division:	Energy Branch
EIS Guidelines Reference (Where provided):	7.2.4 Transportation Impact Study and Traffic Management Plan
Reviewer’s Comment:	N/A
Response:	No response required.
Supporting Documentation:	None

Response to EB 40

Comment ID:	EB40
Department:	Industry, Energy, and Technology
Branch/ Division:	Energy Branch
EIS Guidelines Reference (Where provided):	7.2.5 Public Participation Plan
Reviewer’s Comment:	<p>IET (Energy) has no concerns with the Public Participation Plan.</p> <p>The EIS identifies local stakeholders known to IET, some of whom have contacted IET in the past regarding the Project, for example, the Codroy Valley Area Development Association.</p> <p>The EIS appropriately identifies stakeholders who represent the interests of specific underrepresented groups noted in the REP (i.e., Indigenous Governments and Organizations, organizations representing women).</p> <p>The EIS does not identify Enviro Watch NL, or the Avalon Chapter of the Council of Canadians, as stakeholders, both of whom have voiced opposition to the project; however, these statements may have been made following the submission of the EIS.</p> <p>The EIS identifies multiple means of communicating with the public, including a project website, newsletter, social media platforms, community office, and online survey. The EIS details over 30 engagements with Indigenous stakeholders on the project, most of which were meetings or phone calls.</p> <p>The EIS identifies 14 community drop-in meetings and four open house sessions in communities near the project area.</p>

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Comment ID:	EB40
	The EIS does not detail planned or upcoming engagement, but notes that WEGH2 will continue to dedicate a full-time team to stakeholder and Indigenous engagement.
Response:	Thank you. No response required.
Supporting Documentation:	None

Response to EB 41

Comment ID:	EB41
Department:	Industry, Energy, and Technology
Branch/ Division:	Energy Branch
EIS Guidelines Reference (Where provided):	7.2.6 Workforce and Employment Plan
Reviewer’s Comment:	<p>Section 7.2.6 of the EIS Guidelines requires that an employment plan that includes: “A commitment to develop a Benefits Agreement that meets the approval of the Minister of Industry, Energy and Technology, and includes a Gender Equity, Diversity and Inclusion Plan that meets the requirements of the Minister responsible for Women and Gender Equality.”</p> <p>In the Workforce and Employment Plan, the proponent notes:</p> <p>“6. Benefits Agreement</p> <p>World Energy GH2 commits to developing a Benefits Agreement that meets the approval of the Minister of Industry, Energy and Technology, and includes a DEIB Plan that meets the requirements of the Minister responsible for Women and Gender Equality.</p> <p>World Energy GH2 recognizes the impact the project will have on the local area and its people, and shall develop a Benefits Agreement to ensure employment and economic opportunities are focused on supporting and empowering local residents, businesses, and Indigenous groups”</p> <p>Please note that the proponent has used the term “DEIB” (diversity, equity, inclusion and belonging) in its commitment. Nevertheless, this commitment is acceptable to meet the requirements by IET to commit to develop a Benefits Agreement and a Gender Equity, Diversity, and Inclusion Plan.</p> <p>For other comments on the availability of skilled and unskilled labour, see EIS Guidelines 4.2.7 d) (Economy, Employment and Business).</p>
Response:	Thank you. No response required.
Supporting Documentation:	None

Response to EB 42

Comment ID:	EB42
Department:	Industry, Energy, and Technology
Branch/ Division:	Energy Branch
EIS Guidelines Reference (Where provided):	7.2.7 Domestic Wood Cutting Consultation Plan
Reviewer's Comment:	N/A
Response:	No response required.
Supporting Documentation:	None

Response to EB 43

Comment ID:	EB43
Department:	Industry, Energy, and Technology
Branch/ Division:	Energy Branch
EIS Guidelines Reference (Where provided):	7.2.8 Environmental Effects Monitoring Programs (EEMPs)
Reviewer's Comment:	N/A
Response:	No response required.
Supporting Documentation:	None

Response to EB 44

Comment ID:	EB44
Department:	Industry, Energy, and Technology
Branch/ Division:	Energy Branch
EIS Guidelines Reference (Where provided):	7.2.8.1 Species at Risk Impacts Mitigation and Monitoring Plan
Reviewer’s Comment:	N/A
Response:	No response required.
Supporting Documentation:	None

Response to EB 45

Comment ID:	EB45
Department:	Industry, Energy, and Technology
Branch/ Division:	Energy Branch
EIS Guidelines Reference (Where provided):	7.2.8.2 Groundwater and Surface Water Monitoring Program
Reviewer’s Comment:	N/A
Response:	No response required.
Supporting Documentation:	None

Response to EB 46

Comment ID:	EB46
Department:	Industry, Energy, and Technology
Branch/ Division:	Energy Branch
EIS Guidelines Reference (Where provided):	7.2.8.3 Avifauna Impacts Mitigation and Monitoring Plan
Reviewer's Comment:	N/A
Response:	No response required.
Supporting Documentation:	None

Response to EB 47

Comment ID:	EB47
Department:	Industry, Energy, and Technology
Branch/ Division:	Energy Branch
EIS Guidelines Reference (Where provided):	7.2.8.4 Outfitter Environmental Effects Monitoring Plan (OEEMP)
Reviewer's Comment:	N/A
Response:	No response required.
Supporting Documentation:	None

Response to EB 48

Comment ID:	EB 48
Department:	Industry, Energy, and Technology
Branch/ Division:	Energy Branch
EIS Guidelines Reference (Where provided):	8.0 Residual Effects and Determination of Significance
Reviewer’s Comment:	N/A
Response:	No response required.
Supporting Documentation:	None

Response to EB 49

Comment ID:	EB49
Department:	Industry, Energy, and Technology
Branch/ Division:	Energy Branch
EIS Guidelines Reference (Where provided):	9.0 Assessment Summary and Conclusions
Reviewer’s Comment:	Chapter 26 notes that after all mitigation commitments are implemented, the only significant changes to valued environmental components (VECs) related to species diversity for the wetlands and vegetation. IET (Energy) concurs that the project’s objectives and approach are generally aligned with provincial energy policy, as outlined in the province’s Renewable Energy Plan and the Minister of IET’s mandate letter.
Response:	Thank you. No response required.
Supporting Documentation:	None

Response to EB 50

Comment ID:	EB50
Department:	Industry, Energy, and Technology
Branch/ Division:	Energy Branch
EIS Guidelines Reference (Where provided):	10.0 Public Consultation
Reviewer’s Comment:	IET (Energy) has no comments on the Public Consultation section. For IET (Energy) comments on the Public Participation Plan, see EIS Guidelines 7.2.5.
Response:	Thank you. No response required.
Supporting Documentation:	None

Response to EB 51

Comment ID:	EB 51
Department:	Industry, Energy, and Technology
Branch/ Division:	Energy Branch
EIS Guidelines Reference (Where provided):	11.0 Environmental Protection Plan (EPP)
Reviewer’s Comment:	IET (Energy) has no comments on the EPP.
Response:	Thank you. No response required.
Supporting Documentation:	None

Response to EB 52

Comment ID:	EB 52
Department:	Industry, Energy, and Technology
Branch/ Division:	Energy Branch
EIS Guidelines Reference (Where provided):	12.0 References
Reviewer's Comment:	IET (Energy) has no comments on references/sources cited throughout the EIS.
Response:	Thank you. No response required.
Supporting Documentation:	None

Response to EB 53

Comment ID:	EB 53
Department:	Industry, Energy, and Technology
Branch/ Division:	Energy Branch
EIS Guidelines Reference (Where provided):	13.0 Personnel
Reviewer's Comment:	IET (Energy) has no comments on the key WEGH2 personnel/ consultants responsible for preparing the EIS.
Response:	Thank you. No response required.
Supporting Documentation:	None

Response to EB 54

Comment ID:	EB 54
Department:	Industry, Energy, and Technology
Branch/ Division:	Energy Branch
EIS Guidelines Reference (Where provided):	14.0 Commitments Made in the EIS
Reviewer’s Comment:	<p>Appendix 26-A summarizes commitments that are included throughout the EIS, up to # 366. However, the proponent was required to provide a list of “all” commitments, and that each commitment must be “cross-referenced to the section of the EIS where it has been made.”</p> <p>The proponent did not include all commitments, as there are missing numbers in the table (e.g., commitment 66-69; 75; 127; 234; 235; etc.). In addition the list of commitments cannot be easily cross referenced by only using the commitment ID #.</p>
Response:	Appendix 26-A has been updated to include cross referencing to appropriate sections in the Environmental Impact Statement (EIS) and is appended to the EIS Amendment as Appendix HSC20-A. The above-noted ‘missing mitigation measures’ have now been included in Appendix 26-A.
Supporting Documentation	Appendix HSC20-A: Updated Appendix 26-A from the Environmental Impact Statement

Response to EB 55

Comment ID:	EB 55
Department:	Industry, Energy, and Technology
Branch/ Division:	Energy Branch
EIS Guidelines Reference (Where provided):	15.0 Copies of Reports
Reviewer’s Comment:	No comment.
Response:	Thank you. No response required.
Supporting Documentation:	None

7.2 Mining and Minerals Development Branch

The Newfoundland and Labrador (NL) Department of Industry, Energy and Technology Municipal – Mining and Minerals Development Branch has provided comments based on the review of the Project Environmental Impact Statement (EIS). Their comments and WEGH2's responses are provided below.

Response to MMD 1

Comment ID:	MMD 1
Department:	Industry, Energy, and Technology
Branch/ Division:	Mining and Mineral Development
EIS Guidelines Reference (Where provided):	1.3 (a) (all sites required to be viable)
Reviewer's Comment:	
Response:	No response required.
Supporting Documentation:	None

Response to MMD 2

Comment ID:	MMD 2
Department:	Industry, Energy, and Technology
Branch/ Division:	Mining and Mineral Development
EIS Guidelines Reference (Where provided):	2.1 (all storage sites, e.g., salt)
Reviewer's Comment:	
Response:	No response required.
Supporting Documentation:	None

Response to MMD 3

Comment ID:	MMD 3
Department:	Industry, Energy, and Technology
Branch/ Division:	Mining and Mineral Development
EIS Guidelines Reference (Where provided):	2.1 (a) (nearest industrial sites)
Reviewer's Comment:	<p>This Guideline directed the proponent to provide a description of the geographical settings in which project components are located or will take place, including GPS locations, proximity to other features, and appropriately scaled maps.</p> <p>BSA-4 describes the presence of various forms of mineral tenure, the presence of current mining operations, the presence of quarries, the presence of mineral commodities, and provides highlights from the history of exploration in the broader regions examined. However, the descriptions do not account for current exploration activities or the significance of the specific overlaps. Overall, the descriptive text is too general and lacks many of the specific details that would be relevant to project planning, assessment of impacts, and mitigations. Also, there are a number of factual inaccuracies in the text.</p> <p>BSA-4 also provides a number of maps showing the above features, however the figures presented in BSA-4 in relation to our mandate (Figures 4.9 – 4.15) are not appropriately scaled or sufficiently clear to show proximity of project components to features relevant to our mandate, including the Lower Cove mine site or associated areas of mineral tenure, including areas corresponding to planned or potential future expansions. Also, Figure 4.12 is incorrect (shows historic mineral licences when intended to show current mineral licences). As with the descriptive text, the figures do not depict the existing features of relevance to our mandate at a scale that would be relevant to project planning, assessment of impacts, and mitigations.</p> <p>In relation to those industrial sites relevant to our mandate, the EIS does not adequately address the information requirement set out in the guideline.</p>
Response:	<p>WEGH2 acknowledges the inaccuracies in the text with respect to petroleum activity and has revised the text as follows:</p> <p>Western Newfoundland is considered a low priority area for the petroleum industry. There are currently two exploration permits and one production lease in the onshore portion of Western Newfoundland and one offshore exploration licence in Western Newfoundland. The one onshore production lease overlaps with the Project; the two onshore exploration licences do not. WEGH2 acknowledges the Newfoundland and Labrador Department of Industry, Energy and Technology's (NLDIET) confirmation of overlap between the proposed undertaking and PL2002-01(A), a proven hydrocarbon from the Anticosti basin. WEGH2 notes that Enegi has 100% ownership of the aforementioned lease.</p> <p>There is one active exploration licence (EL-1070) in Western Newfoundland, that being to Shoal Point Energy Ltd. It is located off the north coast of the Port au</p>

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Comment ID:	MMD 3
	<p>Port Peninsula. Although the exploration licence is located offshore, the wells have been drilled onshore to offshore with the well heads located onshore.</p> <p>WEGH2 further acknowledges that a shared-use plan will be negotiated with Enegi Oil Inc., within the parameters of Enegi’s mineral rights, where there is an approximate 5.3 km² overlap to ensure an appropriate setback between any wind turbines and associated oil and gas infrastructure.</p> <p>WEGH2 notes that Vulcan / Investcan Joint Venture drilled until 2011.</p> <p>Maps have been revised to a 1:50,000 scale to better illustrate Project components overlaid over respective mining and minerals development features. The revised figures can be found in Map Appendices as follows:</p> <ul style="list-style-type: none"> • Appendix MMD3-A – Quarries, Mining Leases, and Exempt Mineral Lands in the Project Area • Appendix MMD3-B – Producing Mines, Mineral Claims, and Mineral Commodity Occurrences in the Project Area • Appendix MMD3-C – Petroleum Industry Activity in the Project Area <p>WEGH2 acknowledges that Figure 4.12 in BSA-4 of the EIS included in the Socio-economic Baseline Study erroneously depicts historical mineral claims. Appendix MMD3-A illustrates existing claims for mineral exploration as sourced from NLDIET’s Geoscience database.</p> <p>Additional description of baseline conditions and details relevant to Project planning, mitigation measures, and assessment of environmental effects associated with the revised figures for the Project is presented below.</p> <p>There are a number of existing mining leases in and around the Regional Assessment Area (RAA). This includes mining leases on the Port au Port Peninsula associated with CEMEX, mineral tenure impost land on the Port au Port Peninsula associated with Dallard Management Inc., and three parcels of mineral tenure impost land in and around (i.e., to the northeast and southeast of) Stephenville associated with Westside Asphalt & Concrete Inc. (Appendix MMD3-A [Pages 5/6 of 26, 11 of 26, 13/14 of 26]). In addition, there are mining leases that were issued to Red Moon Resources Inc. for a producing gypsum mine in Flat Bay that is currently operated by Atlas Salt Inc.¹, as well as a mining lease associated with Turf Point Resources Inc. and its proposed aggregate quarry in Flat Bay (NLDECC 2023) and a mineral tenure impost land associated with Westside Asphalt & Concrete Inc. (Appendix MMD3-A [Page 15 of 26, Page 19 of 26 of the EIS]). Multiple, relatively short duration, commercial quarry permits have been issued to individuals or small local contractors throughout the Port au Port Peninsula, Codroy / Bay St. George South area, in and around the Town of Stephenville and the general RAA (Appendix MMD3-A [Pages 1 to 26]; Geoscience Atlas NLDIET 2023). The permits are typically only valid for a short time and are understood to be related to use of local pit run sand and gravel fill for construction activities.</p> <p>The RAA is located within the Humber Zone of Western Newfoundland, which is characterized by plutonic and volcanic rock and carbonate and siliciclastic rock known to host gold, lead, magnetite, and nickel, copper, and cobalt, as well as</p>

¹ Red Moon Resources Inc. formally changed its name to Atlas Salt Inc. on September 1, 2021 (Atlas Salt Inc. 2021).

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	<p>industrial minerals like limestone, dolomite, gypsum, and salt. The St. George Group (Lower Ordovician) is a complex succession of limestone and dolostone on the western shore of Isthmus Bay and across the Port au Port Peninsula (Newfoundland and Labrador Department of Natural Resources 2008). There are 46 mineral commodities known to be present within the RAA. Areas of known mineral commodities in the Project Area are identified on revised figures, Pages 1 to 26 (see Appendix MMD3-B) as either “developed prospects”, “indications”, “past producer (dormant)”, “past producer (exhausted)”, “producers”, “prospects”, or “showing” (NLDIET n.d.). See the Socioeconomic Environment and Land and Resource Use Baseline Study (Appendix BSA-4 of the Environmental Impact Statement (EIS) for definitions.</p> <p>There are two producing mines within the RAA: a limestone and dolomite mine operated by CEMEX (formerly Atlantic Minerals Ltd.) on the Port au Port Peninsula and a gypsum mine operated by Atlas Salt Inc. (formerly Red Moon Resources Inc.) in Flat Bay (Stantec 2023). The Lower Cove mine produces chemical grade limestone and dolomite and construction aggregates. They have been in production since 1988 (NLDIET, Mining and Mineral Development Branch 2022 [2022 – Mining and Newfoundland and Labrador – Volume 26]). Atlantic Minerals Limited (CEMEX) expanded their mine activities into the White Hills area, adjacent to the existing mine in 2016 (NLDIET n.d., [Mining Industry Overview]). Atlas Salt Inc. reactivated the Ace Gypsum deposit, a small past-producing mine, to extract gypsum and anhydrite, a form of gypsum (NLDIET, Mining and Mineral Development Branch 2022 [2022 – Mining in Newfoundland and Labrador – Volume 26]).</p> <p>Approximately 1,100 km of seismic survey lines have been collected in Western Newfoundland, with concentrations in specific regions including Parsons Pond, Port au Port Peninsula, northern St. George’s Bay, and the Deer Lake area lowlands of the upper Humber River (Hinchey et al. 2014). Refer to revised Figures Geophysical Seismic Survey Lines in the Project Area (Appendix MMD3-C [Pages 1 to 26]).</p> <p>References:</p> <p>Hinchey, A.M., Knight, I., Kilfoil, G., Hynes, K.T., Middleton, D., and L.G. Hicks. 2014. The Green Point Shale of Western Newfoundland. Department of Natural Resources. Government of Newfoundland and Labrador.</p> <p>NLDECC (NL Department of Environment and Climate Change). 2023. Environmental Assessment Bulletin. Available online: https://www.gov.nl.ca/ecc/files/01-13-2022.pdf</p> <p>NLDIET (Newfoundland and Labrador Department of Industry, Energy and Technology). n.d. MODS Help File. Available online: https://www.gov.nl.ca/iet/mines/geoscience/mods/mods-help/</p> <p>NLDIET (Newfoundland and Labrador Department of Industry, Energy and Technology). 2022. Mining in Newfoundland and Labrador, Volume 26. Available online: https://www.gov.nl.ca/iet/files/22445-Mining-in-NL-Final-for-Web-Oct-24.pdf</p> <p>NLDIET (Newfoundland and Labrador Department of Industry, Energy and Technology). 2023. Geoscience Atlas. Available online: https://geoatlas.gov.nl.ca/Default.htm</p>

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	NLDNR (Newfoundland and Labrador Department of Natural Resources). 2008. Current Research, Geological Survey Report 08-1, pp. 115-149. Stantec (Stantec Consulting Ltd.). 2023. Project Nujio’qonik – Socio-economic Environment and Land and Resource Use Baseline Study (Appendix BSA-4). Environmental Impact Statement.
Supporting Documentation	Appendix MMD3-A Quarries, Mining Leases, and Exempt Mineral Lands in the Project Area Appendix MMD3-B Producing Mines, Mineral Claims, and Mineral Commodity Occurrences in the Project Area Appendix MMD3-C Petroleum Industry Activity in the Project Area

Response to MMD 4

Comment ID:	MMD 4
Department:	Industry, Energy, and Technology
Branch/ Division:	Mining and Mineral Development
EIS Guidelines Reference (Where provided):	2.3.1 (b)(ii) (storage facilities incl. underground)
Reviewer’s Comment:	In light of statements made elsewhere, information requirement as it relates to our mandate is no longer applicable.
Response:	Thank you. No response required.
Supporting Documentation:	None

Response to MMD 5

Comment ID:	MMD 5
Department:	Industry, Energy, and Technology
Branch/ Division:	Mining and Mineral Development
EIS Guidelines Reference (Where provided):	2.3.2 (i) (details of salt deposit development)
Reviewer’s Comment:	Concordance table provides statement indicating that no underground storage proposed for the project. In light of statement, information requirement as it relates to our mandate is no longer applicable.
Response:	Thank you. No response required.
Supporting Documentation:	None

Response to MMD 6

Comment ID:	MMD 6
Department:	Industry, Energy, and Technology
Branch/ Division:	Mining and Mineral Development
EIS Guidelines Reference (Where provided):	2.3.2 (j) (location of quarries, including boundaries, primary and alternate)
Reviewer’s Comment:	(Section 2.3.2 of the Guidelines concerns construction activities, locations, materials, and methods.) This Guideline asks proponent to identify the “ <i>location of existing and proposed primary and alternate quarry sites, including boundaries, that are or may be needed to supply materials to the Project</i> ”.
Response:	WEGH2 plans to quarry within the right of way (RoW) corridor; quarries outside of the RoW corridor will be separately permitted, if required. Appendix MMD6-A provides prospective quarry locations. These locations are meant to be indicative only, insufficient data are available without geotechnical investigation and advanced stage civil design, required to finalize quarry site selection.
Supporting Documentation:	Appendix MMD6-A Prospective Quarry Locations

Response to MMD 7

Comment ID:	MMD 7
Department:	Industry, Energy, and Technology
Branch/ Division:	Mining and Mineral Development
EIS Guidelines Reference (Where provided):	2.3.2 (j) (location of quarries, including boundaries, primary and alternate)
Reviewer’s Comment:	No specific sites were identified and no boundaries were provided for potential new sites. While the proponent states that they expect that the majority of quarry materials can be sourced through excavation from within the right-of-way of the access roads, they also: <ul style="list-style-type: none"> • state that they “will look to use existing quarry facilities and existing sites to the extent possible”; • state that “quarry sites (and resulting permits) may be needed outside of the envisioned road ROW” depending on rock quality and material needs; • reference a volume of 3,000,000 cubic metres of rock excavated by quarrying; • estimate an average depth of “quarry rock cuts” of 8.0 m (alongside a separate depth estimate for “road rock cuts”); • reference the need for crushing and screening; and • (in Table 1.14 of 1.3.3) list ‘Quarry Development Permit’ as a potential permit requirement for the project.

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Comment ID:	MMD 7
	<p>Due to the scale of the material needs combined with the scarcity of existing quarry sites on the Port au Port Peninsula, Guideline 2.3.2 (j) required specific sites to be identified, including provisional boundaries to be provided for potential new sites. Note that the purpose of identifying quarry sites also encompasses:</p> <ul style="list-style-type: none"> • identifying where required operations such as crushing and screening would take place; • identifying where materials will be stored during processing and providing an expectation as to where potential excess materials will be located. <p>Given the very large quantities of materials cited in the text (millions of cubic metres), each of the above factors (scale of material needs, scarcity of existing sites, need for processing sites, need for stockpile sites) justifies the need for specific quarry sites to be identified as requested.</p> <p>The information requirements of the Guideline were not met.</p>
Response:	<p>WEGH2 plans to quarry within the right of way (RoW) corridor; quarries outside of the RoW corridor will be separately permitted, if required.</p> <p>Appendix MMD6-A provides prospective quarry locations. These locations are meant to be indicative only, insufficient data are available without geotechnical investigation and advanced stage civil design, required to finalize quarry site selection.</p> <p>Crushing and screening will take place wherever suitable building materials in sufficient quantities are encountered inside the RoW of the roads and laydowns and also inside the boundaries of stand-alone quarries. Material will be temporarily stored inside the RoW of the roads and laydowns or inside the boundaries of stand-alone quarries.</p>
Supporting Documentation:	Appendix MMD6-A Prospective Quarry Locations

Response to MMD 8

Comment ID:	MMD 8
Department:	Industry, Energy, and Technology
Branch/ Division:	Mining and Mineral Development
EIS Guidelines Reference (Where provided):	2.3.2 (k) (classes and quantities of quarry materials)
Reviewer’s Comment:	<p>Guideline asks proponent to identify the classes and quantities of quarry materials that are or may be required for the Project, including for various project uses including construction of access roads and tower bases.</p> <p>Quantities of materials are cited in the text and also in Table 2.4; however, the vagueness of the categories (e.g., ‘Common Excavation (m³) – 3,500,000’), potential overlap between categories cited, and a lack of a discernable accounting of materials (needs, supply, and surplus) mean that we cannot consider the information requirements of this Guideline to have been met. Overall, we were more confused than informed by the information presented.</p> <p>In addition, given the immense volumes of material expected to be excavated simply to construct the project – e.g., 4,000,000 to 8,000,000 cubic metres of rock excavated by blasting (in addition to the surficial materials to be excavated) – the question necessarily arises whether, and in what volumes, there may be materials produced in excess of the amounts needed for the project, where these materials will be stored, and what the economic impact may be if large volumes of excess materials were to be sold into the domestic market. The EIS addresses none of these issues.</p>
Response:	<p>A geotechnical survey is required to accurately quantify the balance of material needs for the Project. However, we understand that survey cannot be conducted until EIS release.</p> <p>There is no overlap in categories listed in Table 2.4 of the EIS. Additional approximate breakdowns are provided below in Table MMD 8.1 for Crushed Aggregate. At this time no meaningful sub categorization of Common Excavation is possible without a fulsome geotechnical investigation. 3D design models have been generated based on preliminary road configurations which generated the indicative volumes listed in Table 2.4 of the EIS and associated excavation/backfill balance.</p> <p>Detailed civil design will look to balance the excavation and backfill volumes on the project as closely as possible. As noted in Table 2.4 of the EIS, early assessments indicate there could be a deficit of backfill, meaning large volumes of surplus material are unlikely (dependent on if common excavation is suitable for fill material). The majority of excavated materials is expected to be used as backfill for roads and laydowns. Some excavations surplus may occur in localized areas of the project that will be stockpiled in permanent disposal locations, sited and arranged to blend into existing topography, and not inhibit surface drainage. Stockpile locations that meet the above criteria will be selected along the road ROW as close to the excavation sites as possible to minimize GHG emission, cost and resource requirements. All dump slopes will be</p>

Comment ID:	MMD 8
	<p>stabilized. There is no intent to sell any surplus granular or fill materials into the market.</p> <p>Table MMD8.1 provides a good breakdown of the type of anticipated products the Project will require. The majority are anticipated to be produced with traditional mobile crushing equipment. Some may be produced using screening only techniques (i.e., concrete sand), but highly dependent on the local availability of suitable granular deposits. Table 2.4 of the EIS indicated the breakdown of the product volumes between Codroy and PAP Wind Farms is estimated to be 55% / 45% respectively.</p> <p>Common excavation is a widely used industry term that describes all material overlying bedrock (comparable to “overburden”). While no Project-specific geotechnical work has been conducted, the following is a high level, speculative breakdown based on field observations and industry experience.</p> <p>Common Excavation High Level Order of magnitude breakdown:</p> <ul style="list-style-type: none"> • Organics 1,000,000m³ • Non-Organics Suitable for Fill 1,500,000m³ • Non-Organics Unsuitable for Fill 1,000,000m³ <p>Disposal areas for surplus materials will be contained within the Project boundaries. The Project will require a number of areas of substantial fills. The Project anticipates that it will be possible to dispose of surplus materials by simply ‘over-building’ nearby construction fills and where necessary, using unsuitable surplus materials in portions of the fills beyond the zone of influence for the road loading.</p>
Supporting Documentation:	Table MMD 8.1 Characterization of Crushed Aggregate

Table MMD 8.1 Characterization of Crushed Aggregate

Crushed Aggregate	Volume (m³)
Class A	500,000
Class B	500,000
Concrete Stone	200,000
Structural Rock Fill 6”	150,000
Stemming	50,000
Clear Stine	50,000
Riprap / Armouring Stone	50,000
Total Crushed Aggregate	1,500,000

Response to MMD 9

Comment ID:	MMD 9
Department:	Industry, Energy, and Technology
Branch/ Division:	Mining and Mineral Development
EIS Guidelines Reference (Where provided):	2.3.2 (I) (details of quarry materials exploration and evaluation)
Reviewer’s Comment:	<p>Guideline asks the proponent to identify any exploration or materials testing activities that may be required to evaluate quarry materials to be used for the project, including to evaluate potential extraction sites.</p> <p>The proponent identifies the need for a variety of granular materials required to construct project components, including for concrete for the construction of tower bases, and cites rock quality as a factor in determining whether quarry sites will be needed to source materials outside of access road right-of-ways. The proponent, however, does not identify the activities that may need to be undertaken to assess rock quality for the purposes of producing the large volumes of granular materials required for the project. Outstanding questions remain regarding the suitability of source materials, including:</p> <ul style="list-style-type: none"> • Will the unconsolidated materials excavated in the course of road construction be suitable for screening to produce concrete sand? • Will the bedrock which underlies the areas where road cuts will be made be suitable as crushed aggregate for the purposes indicated? In particular, we expect that some of the sedimentary strata in the Codroy area may be of questionable quality for producing crushed aggregate. <p>The information requirements of the Guideline were not met.</p>
Response:	<p>Quarry and borrow sites will be assessed as part of the broader project geotechnical program, which requires EIS release. The program will involve boreholes at wind turbine sites, potentially boreholes at select quarry sites along with test pitting throughout the road alignments. Field characterization of overburden (common excavation) will be performed along with sample collection for gradation and water content analysis. Rock samples will be collected for laboratory testing (example La Abrasion, Micro Deval, compressive strength tests etc).</p> <p>Activities inside the geotechnical campaign will include sample collection and standard laboratory testing on water content, gradation, proctor, along with strength and wear properties determined from Lab based LA Abrasion, Micro Deval, Petrographic Number and other industry normal tests.</p> <p>Given the length of road network it is possible that some unconsolidated material will be suitable for concrete sand, but cannot be known at this time without a fulsome geotechnical program. There are a number of existing sand borrow pits in the region which can be leveraged to support the project, and provide positive local economic contributions.</p> <p>Given the length of road, presence of existing quarries, and based on local knowledge of the areas, it is very likely that some bedrock material from within the road right of way (RoW) will be suitable for Project aggregates. Accurate</p>

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	estimates for how much of the excavated bedrock will be suitable for a variety of construction applications cannot be determined without completion of the geotechnical campaign, to be undertaken after EIS release.
Supporting Documentation:	None

Response to MMD 10

Comment ID:	MMD 10
Department:	Industry, Energy, and Technology
Branch/ Division:	Mining and Mineral Development
EIS Guidelines Reference (Where provided):	2.3.3 (aa) (identification potential sources quarry materials, primary and alternate sites, for all classes of materials required)
Reviewer’s Comment:	<p>(Section 2.3.3 of the Guidelines asks the proponent to identify all aspects of project operation and maintenance.) This Guideline asks the proponent to identifying “potential sources of quarry materials required for Project operation and maintenance, including primary and alternate sites for all classes of quarry materials required for the Project.</p> <p>No specific sites were identified. See comments as per 2.3.2 (j) and also 2.3.2 (k). The information requirements of the Guideline were not met.</p>
Response:	<p>WEGH2 plans to quarry within the right of way (RoW) corridor; quarries outside of the RoW corridor will be separately permitted, if required.</p> <p>Appendix MMD6-A provides prospective quarry locations. These locations are meant to be indicative only, insufficient data are available without geotechnical investigation and advanced stage civil design, required to finalize quarry site selection</p>
Supporting Documentation:	Appendix MMD6-A Prospective Quarry Locations

Response to MMD 11

Comment ID:	MMD 11
Department:	Industry, Energy, and Technology
Branch/ Division:	Mining and Mineral Development
EIS Guidelines Reference (Where provided):	2.3.4 (c) (underground storage)
Reviewer’s Comment:	In light of statement, information requirement as it relates to our mandate is no longer applicable.
Response:	Thank you. No response required.
Supporting Documentation:	None

Response to MMD 12

Comment ID:	MMD 12
Department:	Industry, Energy, and Technology
Branch/ Division:	Mining and Mineral Development
EIS Guidelines Reference (Where provided):	2.3.5 (list of permits)
Reviewer’s Comment:	Table 1.4 in 1.3.3 lists a “Quarry Development Permit” as a potential permit required for the project. This is acceptable however we note that the correct name of the permit indicated is simply a Quarry Permit.
Response:	Thank you. No response required.
Supporting Documentation:	None

Response to MMD 13

Comment ID:	MMD 13
Department:	Industry, Energy, and Technology
Branch/ Division:	Mining and Mineral Development
EIS Guidelines Reference (Where provided):	3.2 (c) (land area requirements)
Reviewer's Comment:	<p>(Section 3.2 of the Guidelines asked the proponent to identify project alternatives, including design alternatives, to address how environmental factors affect the design and consideration of alternatives, and to justify the alternatives chosen by the proponent.) This Guideline required the proponent to identify and justify land area requirements for the project.</p> <p>Section 3.2.3 does not describe or provide a justification for land area requirements for project. The information requirements of the Guideline were not met.</p>
Response:	<p>WEGH2's approach to land use is to only disturb the land required for the footprint of the Project. However, the area assessed was larger than the required footprint of the Project. As described in Section 5.3.1.3 of the EIS, the Project Area also includes a buffer of up to 300 m for access roads and turbines and a 350 m corridor to accommodate the 70 to 75 m wide right-of-way (RoW) for the transmission line. These buffers allow flexibility for the micro-siting of Project components during detailed design, based on technical considerations as well as the avoidance of environmentally sensitive areas, where practicable. Table MMD13.1 outlines land use estimates within the Crown Land that has been awarded to and leased by WEGH2.</p> <p>Alternatives considered for each component of the Project are described in Section 3.2 of the EIS.</p>
Supporting Documentation:	Table MMD13.1 Land Use Estimates within the Crown Land that has been Leased by WEGH2

Table MMD13-1 Land Use Estimates within the Crown Land that has been Leased by WEGH2

Subsystem	Land Use (Wind Farms)	Buffer / Project Study Area
Access Roads	Section 2.3.2 of our EIS submission defines the preliminary design / location of the access road network. The proposed location/size of the network was derived based on minimum sloping requirements for turbine transport equipment. The minimum width of the road design is specified as 7 m; however, a range of 7 to 9 m is also specified to account for specific changes that may be necessary to negotiate certain turns. These dimensions define our planned land use for access roads.	A buffer / corridor of 300 m (total width) has been applied to the access road location, 150 m on each side of the centerlines shown in Section 2.3.2 of the EIS, Figures 2.2 and 2.3. This area was studied to ensure the final design of the road could be located within and provide space necessary to support the final / detailed design of the Project, as well as account for the results of future geotechnical studies as well as accommodate changes that are necessary to mitigate environmental constraints, such as avoiding vegetation species at risk. While this was defined as a Project / study area, the required land use for the Project is significantly less as summarized in this table.
34.5kV Collector	With reference to Section 2.3.3 of the EIS, the collector system land area required spans a 15 to 20 m right of way for each collector circuit. The length of the collector lines is depicted in Figure 2.2 of the EIS, which establishes the total land required.	A buffer / corridor of 300m (total width) has been applied to collector line, 150 m on each side of the centerlines shown in Figures 2.2 and 2.3 of the EIS. As above, this area was studied so that the final design of the collector lines could be located within and provide space necessary to support the final / detailed design of the Project, as well as account for the results of future geotechnical studies and accommodate changes that are necessary to mitigate environmental constraints such as avoiding vegetation species at risk. While this was defined as a Project / study area, the required land use for the project is substantially less as summarized in this table.
230kV Transmission Line	With reference to Section 2.3.3 of the EIS, the transmission system land area required spans a 70 m right of way (width) based on a two-pole configuration (35 m spacing). The length of the collector lines is depicted in Figure 2.2/2.3 of the EIS, which establishes the total land required for the project.	A buffer / corridor of 350 m (total width) has been applied to transmission line, 175 m on each side of the centrelines shown in Figures 2.2 and 2.3 of the EIS. As above, this area was studied so that the final design of the transmission lines could be located within and provide space necessary to support the final / detailed design of the Project, as well as account for the results of future geotechnical studies and accommodate changes that are necessary to mitigate environmental constraints such as avoiding vegetation species at risk. While this was defined as a Project / study area, the required land use for the project is substantially less as summarized in this table.

Table MMD13-1 Land Use Estimates within the Crown Land that has been Leased by WEGH2

Subsystem	Land Use (Wind Farms)	Buffer / Project Study Area
WTG Sites	With reference to Section 2.5.3 of the EIS, each turbine location will require a developed laydown area of approximately 10,000 m ² . A typical design is shown in Figure 2.32 of the EIS. This establishes the total land required for the Project	A buffer / corridor 500 m was applied to each turbine location, with a 250 m radius from each turbine centre location. As above, this area was studied so that the final design / location of the turbine could be located within this buffer and provide space necessary to support the final / detailed design of the Project, as well as account for the results of future geotechnical studies and accommodate changes that are necessary to mitigate environmental constraints such as avoiding vegetation species at risk. While this was defined as a Project / study area, the required land use for the project is substantially less as summarized in this table.

Response to MMD 14

Comment ID:	MMD 14
Department:	Industry, Energy, and Technology
Branch/ Division:	Mining and Mineral Development
EIS Guidelines Reference (Where provided):	3.2 (f) (underground storage)
Reviewer's Comment:	Concordance table provides statement indicating that no underground storage proposed for the project. In light of statement, information requirement as it relates to our mandate is no longer applicable.
Response:	Thank you. No response required.
Supporting Documentation:	None

Response to MMD 15

Comment ID:	MMD 15
Department:	Industry, Energy, and Technology
Branch/ Division:	Mining and Mineral Development
EIS Guidelines Reference (Where provided):	4.1 (effect on mining and expansions)
Reviewer’s Comment:	<p>(Section 4.1 of the Guidelines asks the proponent to identify key issues related to the project.) The Guideline required that the effects of the project on existing mining operations and planned expansions be included as a factor in the selection of key issues.</p> <p>The proponent makes general statements about the potential to impact mining, quarrying and exploration, including that project components overlap lands corresponding to mineral and quarry tenure, that construction and operation will “interact with” resource uses and restrict access to land by resource users, that there is potential for interference with the ability to develop “mineral areas” in future, that mineral resource operator limitations in relation to proximity to the wind project may result in a reduction in the amount that can be extracted, and that construction activities may result in direct and indirect loss of industrial resource use areas. The proponent acknowledges both the “planned expansion area (eastern half of the mining lease) and the area of potential future additional expansion (western half)” associated with the Lower Cove mining operation. The proponent states that:</p> <ul style="list-style-type: none"> • “Appropriate minimum setback of Project features from the boundaries of current and planned mining leases, surface leases, and any other features associated with the mining operation will be developed in accordance with the applicable site plans.” p. 20.71 • “WEGH2 will engage with the NLDIET, including the [Petroleum] Geoscience division, and local resource stakeholders on associated effects on mineral and petroleum leases, mineral exploration and potential applicable mitigation measures.” p. 20.48 <p>A series of general statements and the absence of details on how the project will affect the mining operation demonstrate that the proponent has not given substantial consideration to the effect of the project on the mining operation. In particular, we wish to emphasize that we do not consider the two statements quoted above as in any way adequate in demonstrating consideration of the effect of the project on the mining operation.</p>
Response:	<p>Please refer to responses provided for MMD 3 and MMD 17.</p> <p>Additional mitigation measures to be applied throughout Project construction, operation and maintenance, and decommissioning and rehabilitation on mining and mineral development include the following:</p> <ul style="list-style-type: none"> • World Energy GH2 (WEGH2) will negotiate a shared-use plan with Enegi Oil Inc., within the parameters of Enegi’s mineral rights, where there is an approximate 5.3 km² overlap to ensure an appropriate setback between any wind turbines and associated oil and gas infrastructure.

Project Nujio’qonik: Amendment to The Environmental Impact Statement

Comment ID:	MMD 15
	<ul style="list-style-type: none"> • A meeting with Cemex is scheduled for January 30th to discuss a mutually beneficial path forward. • WEGH2 will work with mining/quarry operators to determine if blasting mats or other mitigative measures will be required during mining operations within or adjacent to the Project Area to protect Project infrastructure.
Supporting Documentation	<p>Appendix MMD3-A Mining Leases in the Project Area Quarries, Mining Leases, and Exempt Mineral Lands in the Project Area</p> <p>Appendix MMD3-B Producing Mines, Mineral Claims, and Mineral Commodity Occurrences in the Project Area</p> <p>Appendix MMD3-C Petroleum Industry Activity in the Project Area</p>

Response to MMD 16

Comment ID:	MMD 16
Department:	Industry, Energy, and Technology
Branch/ Division:	Mining and Mineral Development
EIS Guidelines Reference (Where provided):	4.2 (VEC description for land and resource use)
Reviewer’s Comment:	<p>(Section 4.2 of the Guidelines asked the proponent to describe relevant aspects of the existing environmental). This Guideline asked the proponent to describe the existing environment as it pertains to land and resource use.</p> <p>BSA-4 (4.3.3)</p> <p>BSA-4 describes the presence of various forms of mineral tenure, the presence of current mining operations, the presence of quarries, the presence of mineral commodities, and provides highlights from the history of exploration in the broader regions examined. However, the descriptions do not account for current exploration activities or the significance of the specific overlaps. Overall, the descriptive text is too general and lacks many of the specific details that would be relevant to project planning, assessment of impacts, and mitigations. Also, there are a number of factual inaccuracies in the text.</p> <p>BSA-4 also provides a number of maps showing the above features, however the figures presented in BSA-4 in relation to our mandate (Figures 4.9 – 4.15) are not appropriately scaled or sufficiently clear to show proximity of project components to features relevant to our mandate, including the Lower Cove mine site or associated areas of mineral tenure, including areas corresponding to planned or potential future expansions. Also, Figure 4.12 is incorrect (shows historic mineral licences when intended to show current mineral licences). As with the descriptive text, the figures do not depict the existing features of relevance to our mandate at a scale that would be relevant to project planning, assessment of impacts, and mitigations.</p>

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Comment ID:	MMD 16
	<p>20.3.2</p> <p>This section consists of three sentences stating that for a residual adverse effect on land and resource use to be considered significant it must either result in non-compliance with some aspect of the law or result in “A change or disruption that restricts or degrades present land and resource use capacity to a point where activities cannot continue at or near current levels and where compensation is not possible.” We do not consider these statements to be helpful in better describing the existing environmental as it pertains to our mandate.</p> <p>It is our assessment that the information requirements of the Guideline were not met in a manner so as to be relevant to project planning, assessment of impacts, and mitigations.</p>
Response:	<p>Maps have been revised to a 1:50,000 scale to better illustrate Project components overlaid over respective mining and minerals development features. The following revised figures are attached:</p> <ul style="list-style-type: none"> • Appendix MMD3-A – Quarries, Mining Leases, and Exempt Mineral Lands in the Project Area • Appendix MMD3-B – Producing Mines, Mineral Claims, and Mineral Commodity Occurrences in the Project Area • Appendix MMD3-C – Petroleum Industry Activity in the Project Area <p>World Energy GH2 acknowledges that Figure 4.12 included in the Socio-economic Baseline Study erroneously depicts historic mineral licences. Appendix MMD16-A illustrates current mineral licences (as sourced from the Department of Industry, Energy and Technology’s Geoscience Site [https://geoatlas.gov.nl.ca/Default.htm]) and is intended to replace Figure 4.12 of the EIS.</p> <p>The significance statement is not meant for describing the existing environment. The statement is for determining whether any residual effects from the assessment are significant or not and is a standard definition for that purpose.</p>
Supporting Documentation	<p>Appendix MMD16-A WebMap of Mineral Claims (Revised EIS Figure 4.12)</p> <p>Appendix MMD3-A Quarries, Mining Leases, and Exempt Mineral Lands in the Project Area</p> <p>Appendix MMD3-B Producing Mines, Mineral Claims, and Mineral Commodity Occurrences in the Project Area</p> <p>Appendix MMD3-C Petroleum Industry Activity in the Project Area</p>

Response to MMD 17

Comment ID:	MMD 17
Department:	Industry, Energy, and Technology
Branch/ Division:	Mining and Mineral Development
EIS Guidelines Reference (Where provided):	4.2.4 (b) (current and historic mining, exploration, quarrying, and min. occurrences)
Reviewer’s Comment:	<p>(Section 4.2 of the Guidelines asked the proponent to describe relevant aspects of the existing environment prior to implementation of the project, including those components that will, or may, be affected by the project.) This Guideline asked the proponent to describe current and historic land use for mining, mineral exploration, and quarrying including the presence of mineral occurrences of potential economic significance.</p> <p>Section 20.2.2 as it relates to features of concern to our mandate consists mostly of general statements. The few specific details mentioned are the presence of mining leases and impost lands and the mining leases. This section in relation to meeting the information needs the guideline has the same deficiencies as BSA-4: overall, the descriptive text is too general and lacks many of the specifics that would be relevant to project planning, assessment of impacts, and mitigations; there are a number of factual inaccuracies in the text; the map provided in this section does not depict the existing features of relevance to our mandate at a scale that would be relevant to project planning, assessment of impacts, and mitigations.</p> <p>It is our assessment that the information requirements of the Guideline were not met in a manner so as to be relevant to project planning, assessment of impacts, and mitigations.</p>
Response:	<p>Section 20.2.2.2, Chapter 20 in the Environmental Impact Statement (EIS) related to Mining, Quarrying, Mineral and Petroleum Exploration is meant to be a summary of the Baseline Study discussion presented in Section 4.3.3.1, Mining Quarrying, Mineral and Petroleum Exploration, and Associated Land Tenure in the Socio-economic Environment and Land and Resource Use Baseline Study (Appendix BSA-4 of the EIS).</p> <p>See response to MMD 3 for correction of noted factual inaccuracies.</p> <p>Maps have been revised to a 1:50,000 scale to better illustrate Project components overlaid over respective mining and minerals development features. The following revised figures are attached:</p> <ul style="list-style-type: none"> • Appendix MMD3-A – Quarries, Mining Leases, and Exempt Mineral Lands in the Project Area • Appendix MMD3-B – Area Producing Mines, Mineral Claims, and Mineral Commodity Occurrences in the Project Area • Appendix MMD3-C – Petroleum Industry Activity in the Project Area <p>Potential Project Interactions with Mining and Mineral Development</p> <p>As per Section 20.5.2, Chapter 20 in the EIS, construction activities may result in the direct loss of commercial mining and mineral development opportunities within</p>

<p>Comment ID:</p>	<p>MMD 17</p>
	<p>the wind reserve area through wind farm site preparation and construction / installation of associated infrastructure and equipment (i.e., collector lines, access roads, 230 kV transmission lines, substations), disturbance and interference with mineral resource extraction activities from the physical footprint of the Project, and indirect loss through reduced and/or disruption of access to mineral resource use areas. Potential pathways for affecting mining/quarry operation includes area lost due to construction, disturbance, and interference with mineral resource extraction activities due to Project proximity and issues related to restricted accessibility during operation and maintenance. Access roads could also affect quarrying operations due to temporary disturbance activities.</p> <p>During the operation and maintenance phase, there is potential for interference with current or future planned mining operations and the ability to develop mineral areas (e.g., mineral or quarry deposits) for future commercial extraction due to presence of the Project components within the Project Area.</p> <p>Mineral Development and Mining Activities within the Project Area</p> <p>A Mining Lease 235 was issued to CEMEX under section 31 of the <i>Mineral Act</i>. As per section 33 of the <i>Mineral Act</i>, after the issuance of the mining lease, a surface lease shall be issued to provide the surface rights necessary to site the mining operation and associated infrastructure within and near the area of the mining lease. The Project Area does not overlap with the Lower Cove mining operation covered by Mining Lease 235 and the corresponding surface lease held by CEMEX Materials Newfoundland Inc. The potential expansion area within Mining Lease 235 similarly is not overlapped by the Project (Appendix MMD3-A [Page 4 of 26]). WEGH2 considered the potential interaction of CEMEX's mining operation (current and potential future) on the Project. Appropriate minimum setback of Project features from the boundaries of current and planned mining leases, surface leases, and any other features associated with the mining operation will be developed in accordance with applicable site plans prior to the beginning of construction.</p> <p>Additional mining leases within the Local Assessment Area (LAA) consist of Mining Lease 186 (0.6 km²), Mining Lease 151 (0.2 km²), Mining Lease 137 (1.0 km²), Mining Lease 171 (0.2 km²), and Mining Lease 225 (0.3 km²), all to Atlantic Minerals Limited (now CEMEX). Refer to Appendix MMD3-A (Pages 4 of 26, 6 of 26, and 12 of 26).</p> <p>There are three mineral tenure impost lands (fee simple mining grant/concession land) comprising 2.6 km² within the Project Area. Impost Lands within the Project Area include Fee Simple Mining Grant Reid Lot 19 (0.5 km²), Fee Simple Mining Grant Reid Lot 11 (0.4 km²) to Westside Asphalt & Concrete Inc., and Fee Simple Mining Grant Reid Lot 200 (1.7 km²) to Reid Newfoundland Company. Additional Impost Lands within the LAA include Fee Simple Mining Grant Reid Lot 21 (0.2 km²) and Fee Simple Mining Grant Reid Lot 20 (<0.1 km²), both to Westside Asphalt & Concrete. Refer to Appendix MMD3-A (Pages 6 of 26, 13/14 of 26, and 19 of 26).</p> <p>Thirteen staked mining claims comprising 17.6 km² are within the Project Area (see Appendix MMD3-A). The mining claims are to: Red Moon Resources Inc. (3.0 km²); Atlantic Minerals Limited (3.2 km²); and three separate individuals (11.3 km²).</p>

Comment ID:	MMD 17
	<p>There are eight quarry sites (commercial permits) in the Port au Port Wind Farm area and along the route for the proposed 230 kV transmission lines comprising 0.2 km² (17.5 ha). Five are in the vicinity of Aguathuna, two are along Romains Brook Forest Access Road, and one is near South West Brook River Bridge (see Appendix MMD3-A [Pages 7, 9 and 12 of 26]). Twenty-seven quarry permits comprising 89.5 ha are within the LAA. Three new applications for quarry permits (commercial) are within the LAA (9 ha).</p> <p>As part of a process of soliciting Government Screening Agency Comments on the Project, the Mining and Mineral Development Branch indicated that quarry materials (e.g., aggregate, fill, rock, stone, boulders, gravel, sand, clay, borrow material, etc.) required for the Project must be sourced from either: 1) a site covered by a quarry permit or quarry lease; 2) an external source as a byproduct of an approved development; or 3) within the legal boundary of the Project site (e.g., within the legal boundary of the corresponding land title or road right-of-way provided that their excavation would be in compliance with other permits and understandings). Given the volume of quarry materials that may be required for road construction and upgrading and concrete production and given that there are relatively few active quarry sites located on the Port au Port Peninsula (several, mostly small sites at Aguathuna, another small site near Mainland-Point Les Vaches), the primary source of material for the Project will be from road cuts.</p> <p>Residual Effects during Project Construction</p> <p>Project construction has the potential to disturb or interfere with mining/quarrying activities in the Project Area and LAA by damaging areas and potentially disrupting future operations/mineral extraction activities. The extent to which the Project could affect existing operations relates to direct effects on mining interests through disruption and disturbance to the potential resource and area loss during construction, and potential for interference with current or future planned operations and the ability to develop mineral areas for future commercial extraction from Project presence. Given the low number of mineral dispositions and quarry deposits affected by Project components, the effect is anticipated to be low in magnitude for the Project Area. The areas affected by Project development and construction activities will be continuous for the period of construction and short-term in duration. Except at turbine tower locations and subject to clearance or set-back restrictions, mining resource use activities will be able to occur adjacent or near the Project Area throughout Project operation. Project-related changes to access would be maintained throughout the life of the Project.</p> <p>In the Port au Port West area and Port au Port East area, there are 12 mineral occurrences identified within the Project Area and two immediately adjacent to the Project Area (Pages 1 to 4 [Appendix MMD3-B]), as follows: limestone (adjacent developed prospect); limestone (prospect), lead (prospect); barium (indication) and limestone (adjacent prospect, [Page 6, Appendix MMD3-B]); and dolomite (developed prospect), coal (indication), limestone (past producers), strontium (indication), lead (showing, indication), and coal (indication, Page 7, Appendix MMD3-B]). In the Stephenville area, two mineral occurrences have been identified immediately adjacent to the PA and one within the Project Area (Pages 10, 11 [Appendix MMD3-B]), as follows: coal (past producer), iron (prospect), and beryllium (indication). In the Codroy area, there two mineral occurrences within the Project Area (Pages 22, 24 [Appendix MMD3-B]), as follows: copper (indication) and barium (indication).</p>

<p>Comment ID:</p>	<p>MMD 17</p>
	<p>One onshore well, the Garden Hill Port au Port #1 well on the Port au Port Peninsula, was successful in achieving limited hydrocarbon production (Hicks and Owens 2015). One production lease, owned by Enegi Oil Ltd. occupies approximately 19.5 km² on the western tip of Port au Port Peninsula (NLDIET 2023b); the Project Area overlaps approximately 5.3 km² of this production lease area (see Appendix MMD3-C [Page 2 of 26]).</p> <p>The Geoscience division expressed no objections to the turbine foundation excavation depth (i.e., 2 to 5 m) or the operational footprint (i.e., 0.4 to 1.2 ha) if a caveat is upheld that WEGH2 will enter into a common use agreement with local stakeholders, which will allow mutual use of land once construction of the turbines is completed. The Geoscience division requested that the proponent relocate turbines 1 – 9 in the Port au Port Wind Farm as they are currently situated on Production Lease 2002-01(A) to Enegi Oil Inc. Section 39 of the <i>Petroleum Regulations</i> provides the lessee with exclusive rights to develop a petroleum pool in and produce petroleum from the area, without interference. The layout of the turbines has subsequently been revised, however turbines 1 – 7 currently remain within the production lease. WEGH2 will work towards final siting of these turbines to avoid conflict and interference with the production lease during the detailed design. Refer to Appendix MMD3-C (Page 2 of 26).</p> <p>With the implementation of mitigation and management measures, residual effects from Project construction on mining and mineral development are anticipated to be negligible (for hydrogen / ammonia plant and Port facilities) to low in magnitude for other Project features (wind farms, 230 kV transmission lines). Project construction effects on commercial mining and mineral development are expected to occur within the Project Area (from the direct loss of area) and LAA (from indirect sensory disturbances). During construction, residual effects are expected to be short term, of no timing sensitivity, and continuous to irregular in frequency. The effects will be reversible once construction has ended. Effects will occur within a relatively disturbed/undisturbed socio-economic context.</p> <p>Residual Effects during Project Operation and Maintenance</p> <p>During the operation and maintenance phase, there is potential for interference with current or future planned facility operations and the ability to develop mineral areas (e.g., mineral or quarry deposits) for future commercial extraction from Project presence. Operational limitations for operators in relation to proximity could result in a reduction of the amount of material excavated due to protection buffers (e.g., setback distance from Project features like turbine towers) implemented by lease holder to protect its infrastructure. Increased access to the turbine sites and along the cleared RoW or other access points could result in increased mineral development activity. However, other factors would contribute to new commercial mineral development, including the nature of the resource itself, market conditions and regulatory controls. An increase in access opportunities is unlikely to affect mineral development.</p> <p>Except at turbine tower locations and subject to clearance or set-back restrictions and agreement on common use, mining, quarrying, mineral, and petroleum exploration activities will be able to occur adjacent or near the Project Area throughout Project operation. Project-related changes in access would likewise be maintained throughout the Project life.</p>

<p>Comment ID:</p>	<p>MMD 17</p>
	<p>There is potential for Lower Cove mining operation to impact the Project itself, such as the potential effects of blasting from current operations or future operations on the Project. Protection buffers (e.g., mutually agreed upon setback distances from blasting areas to turbine towers) may be required to be implemented by WEGH2 to protect Project infrastructure and the mining operation to reduce effects on the mining operation or future operations.</p> <p>Mining activities and dispositions in the RAA correspond to an area totaling approximately 253 km² (25,300 ha). The area of mining activities and dispositions within the Project Area represents approximately 1.6% (4 km² [400 ha]) of the total area of actual or potential mining and mineral development activities in the RAA. Quarry activity within the RAA corresponds to an area totaling approximately 205 ha. The area of quarrying activity within the Project Area represents approximately 8.5% (17.5 ha) of the total area for quarry development.</p> <p>With the implementation of mitigation measures, residual effects from the Project operation and maintenance on mining/mineral extraction and development are anticipated to be of low magnitude. Project disturbance effects on mining/mineral extraction represents a small area (approx. 1.6%) of the total area for mining activities within the RAA. Project effects on mining and mineral development are expected to occur within the Project Area (from the direct loss of area). The disturbance on, or interference with, mining/mineral extraction will have only a small effect on potential extraction activities. The area related to affected sites represents a small area overall. During operation (e.g., turbine and transmission line presence) residual effects are expected to be medium-term, of no timing sensitivity, continuous in frequency, and reversible upon decommissioning and rehabilitation.</p> <p>Residual Effects During Project Decommissioning</p> <p>Depending on the end use of the wind turbine sites (including collector lines, access roads), once decommissioning and rehabilitation activities are completed, some areas may become accessible again for commercial resource development activities (e.g., mining). The rehabilitated Project Area will likely have a mixture of accessible and inaccessible areas and hence be similar in nature to existing conditions on the sites. During Project decommissioning and rehabilitation, no new residual effects on mining, quarry, mineral, and petroleum exploration are expected. As with operation, the residual effect during Project decommissioning and rehabilitation is characterized as being negligible. Adverse residual effects from decommissioning and rehabilitation on mining and mineral development, have no timing sensitivity, and extend to the Project Area and LAA. The effects are short-term, continuous to irregular in frequency, and are reversible. Effects will occur within a relatively disturbed/undisturbed socio-economic context.</p>
<p>Supporting Documentation</p>	<p>Appendix MMD3-A Quarries, Mining Leases, and Exempt Mineral Lands in the Project Area</p> <p>Appendix MMD3-B Producing Mines, Mineral Claims, and Mineral Commodity Occurrences in the Project Area</p> <p>Appendix MMD3-C Petroleum Industry Activity in the Project Area</p>

Response to MMD 18

Comment ID:	MMD 18
Department:	Industry, Energy, and Technology
Branch/ Division:	Mining and Mineral Development
EIS Guidelines Reference (Where provided):	4.2.4 (h)(iii) (land tenure under <i>Minerals Act</i> and <i>Quarry Materials Act</i>)
Reviewer’s Comment:	<p>This Guideline asked the proponent to describe land tenure under the <i>Mineral Act and Quarry Materials Act</i> (as well as <i>Petroleum and Natural Gas Act</i>).</p> <p>Other than some very general references, section 20.5.2 does not address the presence of land tenure under the legislation we administer. General references include the following statements:</p> <ul style="list-style-type: none"> • “Appropriate minimum setback of Project features from the boundaries of current and planned mining leases, surface leases, and any other features associated with the mining operation will be developed in accordance with the applicable site plans.” p. 20.71 • “WEGH2 will engage with the NLDIET, including the [Petroleum] Geoscience division, and local resource stakeholders on associated effects on mineral and petroleum leases, mineral exploration and potential applicable mitigation measures.” p. 20.48 <p>In particular, we wish to emphasize that we do not consider the two statements quoted above as contributing towards the description of relevant aspects of the areas of land tenure under the legislation we administer (<i>Mineral Act and Quarry Materials Act</i>).</p> <p>The information requirements of the Guideline were not met.</p>
Response:	Please refer to responses to MMD 15 and MMD 17.
Supporting Documentation	None

Response to MMD 19

Comment ID:	MMD 19
Department:	Industry, Energy, and Technology
Branch/ Division:	Mining and Mineral Development
EIS Guidelines Reference (Where provided):	4.2.7 (b) (value of existing industries)
Reviewer's Comment:	<p>This Guideline asked the proponent to describe the value of existing industries, including mining, mineral [exploration], and quarrying.</p> <p>The value of these industries is not examined in BSA-4. The information requirements of the Guideline were not met.</p>
Response:	<p>This information is provided in Section 2.3.1 of the Socioeconomic Environment and Land and Resource Use Baseline Study (Appendix BSA-4 of the Environmental Impact Statement (EIS), specifically see Table 2.1 for value of industries, including mining, mineral exploration and quarrying.</p>
Supporting Documentation	None

Response to MMD 20

Comment ID:	MMD 20
Department:	Industry, Energy, and Technology
Branch/ Division:	Mining and Mineral Development
EIS Guidelines Reference (Where provided):	4.3 (provide a baseline study with respect to land and resource use sufficient to identify any adverse effects and enable follow up)
Reviewer's Comment:	<p>Guideline 4.3 asked the proponent to provide a description of existing conditions in the biophysical and socio-economic environments that could be affected by the project, both in the immediate vicinity and beyond, at a level of detail that shall be sufficient to identify and assess any adverse environmental effects that may be caused by the project and provide the necessary data to enable effective follow-up. The Guideline identified land and resource use (including industrial land use) as one of the components for which a baseline study shall be prepared.</p> <p>BSA-4 (4.3.3) describes the presence of various forms of mineral tenure, the presence of current mining operations, the presence of quarries, the presence of mineral commodities, and provides highlights from the history of exploration in the broader regions examined.</p> <p>However, the descriptions do not account for current exploration activities or the significance of the specific overlaps. Overall, the descriptive text is too general and lacks many of the specific details that would be sufficient to identify and assess any adverse environmental effects that may be caused by the project and provide</p>

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Comment ID:	MMD 20
	<p>the necessary data to enable effective follow-up. Also, there are a number of factual inaccuracies in the text.</p> <p>BSA-4 also provides a number of maps showing the above features, however the figures presented in BSA-4 in relation to our mandate (Figures 4.9 – 4.15) are not appropriately scaled or sufficiently clear to show proximity of project components to features relevant to our mandate, including the Lower Cove mine site or associated areas of mineral tenure, including areas corresponding to planned or potential future expansions. Also, Figure 4.12 is incorrect (shows historic mineral licences when intended to show current mineral licences). As with the descriptive text, the figures do not depict the existing features of relevance to our mandate at a scale that would be sufficient to identify and assess any adverse environmental effects that may be caused by the project and provide the necessary data to enable effective follow-up.</p> <p>The EIS does not address baseline conditions concerning the current supply of quarry materials available to the domestic market. Given the immense volumes of material expected to be excavated simply to construct the project – e.g., 4,000,000 to 8,000,000 cubic metres of rock excavated by blasting (in addition to the surficial materials to be excavated) – the question necessarily arises whether, and in what volumes, there may be materials produced in excess of the amounts needed for the project, where these materials will be stored, and what the economic impact may be if large volumes of excess materials were to be sold into the domestic market.</p> <p>The information requirements of the Guideline were not met.</p>
Response:	Please refer to responses to MMD 3 and MMD 8.
Supporting Documentation	<p>Appendix MMD3-A Mining Leases in the Project Area</p> <p>Appendix MMD3-B Areas of Known Mineral Commodity Occurrences in the Project Area</p> <p>Appendix MMD3-C Geophysical Seismic Survey Lines in the Project Area</p> <p>Table MMD 8.1 Characterization of Crushed Aggregate</p>

Response to MMD 21

Comment ID:	MMD 21
Department:	Industry, Energy, and Technology
Branch/ Division:	Mining and Mineral Development
EIS Guidelines Reference (Where provided):	4.3.4 (b)(ii) (...mining and exploration activity)
Reviewer’s Comment:	This Guideline indicated that the baseline study of land and resource use must include a focus on industrial land use, and interaction of the project with industrial land uses, including existing and planned mining, mineral exploration and quarrying activity and also a description of historic land use in these respects. Comments as above for BSA-4.
Response:	Please see responses to MMD 3, MMD 15 and MMD 17.
Supporting Documentation	Appendix MMD3-A Mining Leases in the Project Area Appendix MMD3-B Areas of Known Mineral Commodity Occurrences in the Project Area Appendix MMD3-C Geophysical Seismic Survey Lines in the Project Area

Response to MMD 22

Comment ID:	MMD 22
Department:	Industry, Energy, and Technology
Branch/ Division:	Mining and Mineral Development
EIS Guidelines Reference (Where provided):	4.3.4 (ii) (mining and exploration activity)
Reviewer’s Comment:	Comments as above for BSA-4 (4.3.3 deals specifically with Commercial and Industrial Land Use, whereas the preceding portion of 4.3 is very general introduction)
Response:	Thank you. No response required.
Supporting Documentation	None

Response to MMD 23

Comment ID:	MMD 23
Department:	Industry, Energy, and Technology
Branch/ Division:	Mining and Mineral Development
EIS Guidelines Reference (Where provided):	6.2 (f)(i – iv) (effects of project on land use and tenure) – breakdown below
Reviewer’s Comment:	(Guideline 6.2 required that the EIS contain a comprehensive analysis of the predicted environmental effects of each project alternative with respect of all stages of the project and that predicted environmental effects shall be defined quantitatively and qualitatively. Subsection (f) directs the proponent to include effects of the project on land use and tenure.)
Response:	<p>As per Section 3 of the Environmental Impact Statement (EIS) Guidelines, World Energy GH2 (WEGH2) looked at several factors, including environmental, when assessing alternatives to various components of the Project. As per Section 3 of the EIS Guidelines, WEGH2 conducted a “comparative analysis of the environmental effects and technical and economic feasibility of alternatives that led to the selected Project alternative”. “The preferred alternatives shall be identified, with the selection based on clearly described methods”. Chapter 3 of the EIS included a comparative analysis of the environmental effects and technical and economic feasibility of alternatives that led to the selected Project alternative, as well as environmentally preferred alternative. The selected (preferred) Project alternative was carried forward in the analysis of environmental effects (Guideline Section 6).</p> <p>Alternative locations for onshore wind farms in western Newfoundland were considered by WEGH2 during planning of the Project, including Lewis Hills, Port au Port, and Codroy sites. It was determined that it was technically feasible to install a 1 GW wind farm at Lewis Hills. However, this area was not nominated for development as part of the Crown Land bid process, leaving a focus on the Port au Port and Codroy sites.</p> <p>Where more than one alternative is being considered, the analysis either assessed both (e.g., power transmission from the Port au Port Peninsula via both overhead lines or submarine cable) or assumed the most conservative alternative from the perspective of potential environmental effects. For example, on-land transmission lines, either overhead or buried (duct), were evaluated as having higher impacts on land use when compared to submarine cable installation. Further, as the final layout of the hydrogen / ammonia plant was not yet available, the assessment assumed that the greatest sources of noise would be located closest to potential sensitive receptors. Conservative assumptions were also made with respect to the model of turbine used for the purposes of the noise and visual impact assessment.</p>
Supporting Documentation	None

Response to MMD 24

Comment ID:	MMD 24
Department:	Industry, Energy, and Technology
Branch/ Division:	Mining and Mineral Development
EIS Guidelines Reference (Where provided):	(i) (mining, mineral exploration, quarrying, land access for these activities)
Reviewer’s Comment:	<p>With respect to providing a comprehensive analysis of the predicted environmental effects, both quantitative and qualitative, this Guideline asked the proponent to address mining, mineral exploration, and quarrying, and land accessibility for future mining, mineral exploration, and quarrying, including the accessibility of land for future exploration of limestone and dolomite resources of the St. George Group.</p> <p>The proponent makes general statements about the potential to impact mining, quarrying and exploration, including that project components overlap lands corresponding to mineral and quarry tenure, that construction and operation will “interact with” resource uses and restrict access to land by resource users, that there is potential for interference with the ability to develop “mineral areas” in future, that mineral resource operator limitations in relation to proximity to the wind project may result in a reduction in the amount that can be excavated, and that construction activities may result in direct and indirect loss of industrial resource use areas. The proponent acknowledges both the “planned expansion area (eastern half of the mining lease) and the area of potential future additional expansion (western half)” associated with the Lower Cove mining operation.</p> <p>General statements include the following:</p> <ul style="list-style-type: none"> • “Appropriate minimum setback of Project features from the boundaries of current and planned mining leases, surface leases, and any other features associated with the mining operation will be developed in accordance with the applicable site plans.” p. 20.71 • “WEGH2 will engage with the NLDIET, including the [Petroleum] Geoscience division, and local resource stakeholders on associated effects on mineral and petroleum leases, mineral exploration and potential applicable mitigation measures.” p. 20.48 <p>In particular, we wish to emphasize that we do not consider the two statements quoted above as in any way adequate in meeting the requirement to provide a comprehensive analysis of the predicted environmental effects of the project on mining, mineral exploration, and quarrying, and land accessibility for future mining, mineral exploration, and quarrying.</p> <p>The EIS does not mention the impact the project has already had on the Lower Cove mining operation by the placement of a meteorological tower and corresponding issuance of a Licence to Occupy under the <i>Lands Act</i> within the area of the mining lease and surface lease recently issued and intended to provide area for future expansion of mining (the proposal to place the meteorological tower was made to government after the EIS guidelines were finalized).</p>

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Comment ID:	MMD 24
	<p>The EIS contains statements about the potential for ice throw from turbine blades and, in relation to proximity of the project of the Lower Cove mining operation and associated areas of mineral tenure, this raises the concern of safety associated with the potential for ice thrown from turbine blades to enter areas subject to mining, whether areas currently mined or areas mined in future.</p> <p>The proponent does not provide any specific details on predicted environmental effects concerning mining, mineral exploration, and quarrying, and land accessibility for these activities, including the accessibility of land for future exploration of limestone and dolomite resources of the St. George Group. Indeed, the St. George Group is not even mentioned. No comprehensive analysis of effects has been provided. None of the predicted effects (described only in general terms) have been quantified.</p> <p>Given the immense volumes of material expected to be excavated simply to construct the project – e.g., 4,000,000 to 8,000,000 cubic metres of rock excavated by blasting (in addition to the surficial materials to be excavated) – the question necessarily arises whether, and in what volumes, there may be materials produced in excess of the amounts needed for the project, where these materials will be stored, and what the economic impact may be if large volumes of excess materials were to be sold into the domestic market.</p> <p>The information requirements of the Guideline were not met</p>
Response:	<p>Please refer to responses to MMD 3, MMD 15, and MMD 17.</p> <p>An ice throw assessment undertaken for the Port au Port Wind Farm considered 145 wind turbines each with a hub height of 120 m within the wind farm layout. The results of the analysis indicate that 90% of the nearest fragments will land between 0 m to 170 m (defined as the typical range) from the center of the wind turbine. The range extends to 200 m and 235 m for the nearest 95% and 99% of fragments, respectively. The furthest 1% of fragments would land at a distance ranging from 235 m to 290 m (defined as an exceptional range). However, the assessment concluded that it is improbable that a fragment will reach this distance during the life of the Project. The results note that ice throw events are not evenly distributed as a function of distance from the turbine and become much less frequent with distance (DNV Canada Ltd. 2023; Appendix 19-B of the EIS).</p> <p>In relation to proximity of the Project to the Lower Cove mining operation and associated expansion areas of mineral tenure, there may be potential for ice to be thrown from turbine blades to enter adjacent areas, so may require setback consideration, depending on turbine placement.</p> <p>The only turbines deemed to be within a range of a potential risk area are Turbine 6 (near Route 463) and Turbine 18 (near the Cape St. George community pasture). Turbine 18 is over 290 m from the Cape St. George community pasture and is of low risk in terms of potential ice throw in the vicinity of the public given the setback distance is beyond what is termed an “exceptional” distance. DNV Canada defines “exceptional” distance as a distance ranging from 235 to 290 m (DNV Canada Ltd. 2023).</p> <p>Adoption of winter operating protocols and controls for modern turbines seek to reduce unwanted loads from iced blades, as well as reduce the risk of ice fragments striking a person or other structure, by automatically or manually stopping the wind turbine when higher icing risk conditions exist. This type of</p>

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	<p>operational protocol effectively results in the reduction of ice throw hazard. As a result, a substantial proportion of the detached ice is shed locally as it thaws and slips off the blades, with most of the ice fragments dropping in the immediate vicinity of the turbine, rather than being thrown. DNV recommends a minimum safety setback of rotor radius length + 10 m to any sensitive structure or frequently accessed area by the public. No person should encroach this setback during icing conditions, even when the turbine is idle. Implementing stricter ice mitigation protocols on a project depends on the risk to the nearby public, sensitive infrastructure, and non-stationary structures, and should be evaluated on a turbine-by-turbine basis (DNV Canada Ltd. 2023).</p> <p>Please see response to MMD 8 with respect to preliminary material volume needs for the Project.</p> <p>Reference:</p> <p>DNV Canada Ltd. 2023. Port au Port Wind Farm Ice Throw Analysis. Prepared for World Energy GH2 Inc.</p>
Supporting Documentation	<p>Appendix MMD3-A Mining Leases in the Project Area</p> <p>Appendix MMD3-B Areas of Known Mineral Commodity Occurrences in the Project Area</p> <p>Appendix MMD3-C Geophysical Seismic Survey Lines in the Project Area</p>

Response to MMD 25

Comment ID:	MMD 25
Department:	Industry, Energy, and Technology
Branch/ Division:	Mining and Mineral Development
EIS Guidelines Reference (Where provided):	(ii) (land tenure under <i>Minerals Act</i> and <i>Quarry Materials Act</i>)
Reviewer’s Comment:	<p>With respect to providing a comprehensive analysis of the predicted environmental effects, both quantitative and qualitative, this Guideline asked the proponent to address existing land tenure including under the <i>Mineral Act</i> and <i>Quarry Materials Act</i>.</p> <p>Land tenure is referenced in places; however, beyond general statements, no specific details were provided on environmental effects. No comprehensive analysis of effects has been provided. None of the predicted effects (described only in general terms) have been quantified. General statements include the following:</p> <ul style="list-style-type: none"> • “Appropriate minimum setback of Project features from the boundaries of current and planned mining leases, surface leases, and any other features associated with the mining operation will be developed in accordance with the applicable site plans.” p. 20.71

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Comment ID:	MMD 25
	<ul style="list-style-type: none"> “WEGH2 will engage with the NLDIET, including the [Petroleum] Geoscience division, and local resource stakeholders on associated effects on mineral and petroleum leases, mineral exploration and potential applicable mitigation measures.” p. 20.48 <p>In particular, we wish to emphasize that we do not consider the two statements quoted above as in any way adequate in meeting the requirement to provide a comprehensive analysis of the predicted environmental effects of areas of tenure under the <i>Mineral Act</i> or <i>Quarry Materials Act</i>.</p> <p>The information requirements of the Guideline were not met.</p>
Response:	Please refer to responses for MMD 3, MMD 15 and MMD 17.
Supporting Documentation	<p>Appendix MMD3-A Mining Leases in the Project Area Quarries, Mining Leases, and Exempt Mineral Lands in the Project Area</p> <p>Appendix MMD3-B Producing Mines, Mineral Claims, and Mineral Commodity Occurrences in the Project Area</p> <p>Appendix MMD3-C Petroleum Industry Activity in the Project Area</p>

Response to MMD 26

Comment ID:	MMD 26
Department:	Industry, Energy, and Technology
Branch/ Division:	Mining and Mineral Development
EIS Guidelines Reference (Where provided):	(iii) (underground storage and current mineral rights)
Reviewer’s Comment:	Ch. 20, 20.5, including statement indicating that no underground storage proposed for the project. In light of statements that underground storage is not being considered as a project component, this information requirement as it relates to our mandate is no longer applicable.
Response:	Thank you. No response required.
Supporting Documentation	None

Response to MMD 27

Comment ID:	MMD 27
Department:	Industry, Energy, and Technology
Branch/ Division:	Mining and Mineral Development
EIS Guidelines Reference (Where provided):	(iv) (effects of mining operation)
Reviewer’s Comment:	<p>With respect to providing a comprehensive analysis of the predicted environmental effects, both quantitative and qualitative, this Guideline asked the proponent to address potential effects of existing mining operations on the project, specifically but not limited to, the effects of blasting from the mining operation.</p> <p>Beyond general statements that mineral resource operator limitations in relation to proximity to the wind project may result in a reduction in the amount that can be excavated, no information was provided that addresses the Guideline. The absence of any details addressing the effects of mining on the project itself (which was requested with a view toward ensuring appropriate project setback distances to minimize mutual impacts, including setback distances from areas of potential expansion of the Lower Cove mining operation) is notably absent from the EIS. General statements include the following:</p> <ul style="list-style-type: none"> • “Appropriate minimum setback of Project features from the boundaries of current and planned mining leases, surface leases, and any other features associated with the mining operation will be developed in accordance with the applicable site plans.” p. 20.71 <p>In particular, we wish to emphasize that we do not consider this statement as in any way adequate in meeting the requirement to provide a comprehensive analysis of the predicted environmental effects of the Lower Cove mining operation (present, planned, potential future) on the project.</p> <p>The information requirements of the Guideline were not met.</p>
Response:	<p>Please refer to responses for MMD 3, MMD 15, and MMD 17.</p> <p>There is potential for Lower Cove mining operation to affect the Project itself, such as the potential effects of blasting from current operations or future operations on the Project. Mitigation measures to be applied include the following:</p> <ul style="list-style-type: none"> • WEGH2 will work with mining/quarry operators to determine if blasting mats or other mitigative measures will be required during mining operations within or adjacent to the Project Area. • Protection buffers will be mutually established between WEGH2 and the Lower Cover mining operation, including the establishment of appropriate setback distances to reduce effects on mining operation and WEGH2 Project infrastructure.
Supporting Documentation	<p>Appendix MMD3-A Mining Leases in the Project Area</p> <p>Appendix MMD3-B Areas of Known Mineral Commodity Occurrences in the Project Area</p> <p>Appendix MMD3-C Geophysical Seismic Survey Lines in the Project Area</p>

Response to MMD 28

Comment ID:	MMD 28
Department:	Industry, Energy, and Technology
Branch/ Division:	Mining and Mineral Development
EIS Guidelines Reference (Where provided):	6.4 (a) (including and justify component to study for cumulative effects on, including mines, quarries, and supporting infrastructure)
Reviewer’s Comment:	<p>Guideline 6.4 (a) asked the proponent to identify and justify the environmental components that will constitute the focus of the cumulative effects assessment, including mining operations and supporting infrastructure and quarries.</p> <p>23.4.1 contains no details relevant to our mandate and ranks the potential cumulative effects of “project changes to access and availability to other resource users” as ‘Low’ project contribution to cumulative effects and ‘Low’ potential degree of overall cumulative interaction. The proponent concludes this section stating that “All ‘Project Contribution to Cumulative Effects’ and ‘Potential Changes of Overall Cumulative Interaction’ are ranked as Low. Therefore... advanced to detailed assessment is not required”.</p> <p>In light of the absence of relevant detail we consider that the information requirements of the Guideline were not met.</p>
Response:	<p>Other physical activities with the potential to cumulatively interact with the Project were identified and compiled in a Project Inclusion List (PIL) in the Environmental Impact Statement (EIS) (Chapter 23, Appendix 23-A). Types of physical activities include mining, quarrying, mineral, and petroleum exploration.</p> <p>Mineral exploration within the RAA is ongoing as there are four active mineral exploration companies. Existing quarries are common across the Island and in the RAA; there are 50 in the RAA and eight within the Project Area. Onshore petroleum exploration is inactive; since 1994, over 40 onshore wells have been drilled in western Newfoundland, including exploration wells, delineation wells, and shallow stratigraphic test holes. One petroleum lease area is overlapped by the Project Area on the Port au Port Peninsula. The Lower Cove Quarry (formerly Atlantic Minerals Limited [now CEMEX]) is ongoing. This limestone and dolomite quarry and plant in Lower Cove on the Port au Port Peninsula is adjacent to the Port au Port Wind Farm and not overlapped by the Project Area. Refer to the response in MMD 17 for details.</p> <p>As described in Section 23.1 of the EIS, a screening level assessment was determined to be an adequate approach for the assessment of cumulative effects (i.e., if there was no fundamental means or likelihood of a cumulative interaction then there is no cumulative effect). As such, and as concluded in Section 23.4.2 of the EIS, all “Project Contribution to Cumulative Effects” and “Potential Degree of Overall Cumulative Interaction” are ranked as Low. This indicates a cumulative effect that is relatively minor and adequately managed by conventional Project and other existing mitigation measures. Low further means that the long-term sustainability of land and resource use (VEC) is not anticipated to be compromised. Therefore, as explained in Section 23.1 and 23.5 of the EIS, further detailed assessment was not required given the relatively minor nature of the</p>

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Comment ID:	MMD 28
	Project effects and isolated location of the Project relative to other physical activities with which WEGH2 Project effects may interact.
Supporting Documentation	None

Response to MMD 29

Comment ID:	MMD 29
Department:	Industry, Energy, and Technology
Branch/ Division:	Mining and Mineral Development
EIS Guidelines Reference (Where provided):	7.1 (f)(i) (mitigate potential land use and tenure conflicts with mining, mineral exploration, quarrying, land accessibility for future of these activities)
Reviewer’s Comment:	<p>(Guideline 7.1 asked the proponent to identify and discuss proposed measures that will be implemented to mitigate the significant adverse effects of the project.) This Guideline asked the proponent to address measures to mitigate adverse effects on mining, mineral exploration, and quarrying, and land accessibility for future mining, mineral exploration, and quarrying, including the accessibility of land for future exploration of limestone and dolomite resources of the St. George Group.</p> <p>Section 26.2 is a short collection of very general statements and contains no details relevant to mitigating impacts on the items listed above. As it pertains to features of concern to our mandate, chapter 20 contains an assortment of general statements and contains no specific details relevant to mitigating impacts on features of concern to our mandate. General statements include the following:</p> <ul style="list-style-type: none"> • “Appropriate minimum setback of Project features from the boundaries of current and planned mining leases, surface leases, and any other features associated with the mining operation will be developed in accordance with the applicable site plans.” p. 20.71 • “WEGH2 will engage with the NLDIET, including the [Petroleum] Geoscience division, and local resource stakeholders on associated effects on mineral and petroleum leases, mineral exploration and potential applicable mitigation measures.” p. 20.48 <p>In particular, we wish to emphasize that we do not consider the two statements quoted above as in any way adequate in meeting the requirement to identify and mitigate potential adverse effects on mining, mineral exploration, and quarrying, and land accessibility for future mining, mineral exploration, and quarrying.</p> <p>The EIS does not mention the impact the project has already had on the Lower Cove mining operation by the placement of a meteorological tower and corresponding issuance of a Licence to Occupy under the <i>Lands Act</i> within the area of the mining lease and surface lease recently issued and intended to provide area for future expansion of mining (the proposal to place the meteorological tower was made to government after the EIS guidelines were finalized).</p>

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Comment ID:	MMD 29
	The information requirements of the Guideline were not met.
Response:	Please refer to responses to MMD 3, MMD 15, MMD 17, and MMD 27. As the EIS is focused on the Project, and as the government has already granted approval for construction of the temporary MET towers, through the Crown Lands referral process, they were not assessed as part of the Project in the EIS.
Supporting Documentation	Appendix MMD3-A Mining Leases in the Project Area Quarries, Mining Leases, and Exempt Mineral Lands in the Project Area Appendix MMD3-B Areas of Known Mineral Commodity Occurrences in the Project Area Producing Mines, Mineral Claims, and Mineral Commodity Occurrences in the Project Area Appendix MMD3-C Petroleum Industry Activity in the Project Area

Response to MMD 30

Comment ID:	MMD 30
Department:	Industry, Energy, and Technology
Branch/ Division:	Mining and Mineral Development
EIS Guidelines Reference (Where provided):	7.1 (f)(ii) (existing land tenure under <i>Minerals Act</i> and <i>Quarry Materials Act</i>)
Reviewer’s Comment:	This Guideline asked the proponent to address measures to mitigate adverse effects on existing land tenure under the <i>Mineral Act</i> and <i>Quarry Materials Act</i> (and also <i>Petroleum and Natural Gas Act</i>) including restrictions for project development associated with existing land tenure. Section 26.2 is a short collection of very general statements and contains no details relevant to mitigating impacts on existing land tenure under the <i>Mineral Act</i> and <i>Quarry Materials Act</i> . As it pertains to features of concern to our mandate, chapter 20 contains an assortment of general statements and contains no specific details relevant to mitigating impacts on features of concern to our mandate. The last item in the guideline – requesting that the proponent address restrictions for project development associated with existing land tenure – is notably absent in EIS. The information requirements of the Guideline were not met.
Response:	Please see responses to MMD 3, MMD 15, and MMD 17.
Supporting Documentation	Appendix MMD3-A Mining Leases in the Project Area Quarries, Mining Leases, and Exempt Mineral Lands in the Project Area Appendix MMD3-B Areas of Known Mineral Commodity Occurrences in the Project Area Producing Mines, Mineral Claims, and Mineral Commodity Occurrences in the Project Area Appendix MMD3-C Petroleum Industry Activity in the Project Area

Response to MMD 31

Comment ID:	MMD 31
Department:	Industry, Energy, and Technology
Branch/ Division:	Mining and Mineral Development
EIS Guidelines Reference (Where provided):	7.1 (f)(iii) (underground storage and associated mineral rights)
Reviewer's Comment:	Appendix 1-B (statement indicating that no underground storage proposed for the project). In light of statement, information requirement as it relates to our mandate is no longer applicable.
Response:	No response required.
Supporting Documentation	None

Response to MMD 32

Comment ID:	MMD 32
Department:	Industry, Energy, and Technology
Branch/ Division:	Mining and Mineral Development
EIS Guidelines Reference (Where provided):	7.1 (f)(iv) (potential effects of mining operation on project, including blasting)
Reviewer's Comment:	<p>This Guideline asked the proponent to address potential effects of existing mining operations on the project, specifically but not limited to, the effects of blasting from mining operations.</p> <p>8.4 and 9.4 contain no relevant references to mining or other activities within our mandate. The absence of any details addressing the effects of mining on the project itself (which was requested with a view toward ensuring appropriate project setback distances to minimize mutual impacts, including setback distances from areas of potential expansion of the Lower Cove mining operation) is notably absent from the EIS.</p> <p>The information requirements of the Guideline were not met.</p>
Response:	Please refer to response to MMD 27.
Supporting Documentation	None

8.0 NL Department of Justice and Public Safety, Fire and Emergency Services

The Newfoundland and Labrador Department of Justice and Public Safety, Fire and Emergency Services (DJPS) provided comments during review of the Project Environmental Impact Statement (EIS). The comments received from DJPS indicated that the EIS met the requirements of their relevant sections of the Final EIS Guidelines. Therefore, no additional / supplementary information was requested. Detailed comments and responses are provided below in Section 8.1.

8.1 Detailed Comments

Response to DJPS 1

Comment ID:	DJPS 1
Department:	Justice and Public Safety, Fire and Emergency Services
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	S2.3.2 Construction
Reviewer's Comment:	EIS provides Appendix 2-H Hazardous Materials Response and Training Plan. Plan provides details into priorities, response guidelines, planning, equipment and training.
Response:	Thank you. The equipment list provided in the Emergency Response and Contingency Plan is planned to be located on site.
Supporting Documentation:	None

Response to DJPS 2

Comment ID:	DJPS 2
Department:	Justice and Public Safety, Fire and Emergency Services
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	S2.3.3 Operation and Maintenance
Reviewer's Comment:	EIS provides Appendix 2-H Hazardous Materials Response and Training Plan. Plan provides details into priorities, response guidelines, planning, equipment and training.
Response:	Thank you. The equipment list provided in the Emergency Response and Contingency Plan is planned to be located on site.
Supporting Documentation:	None

Response to DJPS 3

Comment ID:	DJPS 3
Department:	Justice and Public Safety, Fire and Emergency Services
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	S2.3.4 Decommissioning and Rehabilitation
Reviewer’s Comment:	EIS provides Appendix 2-H Hazardous Materials Response and Training Plan. Plan provides details into priorities, response guidelines, planning, equipment and training.
Response:	Thank you. The equipment list provided in the Emergency Response and Contingency Plan is planned to be located on site.
Supporting Documentation:	None

Response to DJPS 4

Comment ID:	DJPS 4
Department:	Justice and Public Safety, Fire and Emergency Services
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	S2.3.5 Regulatory Framework and Government Oversight
Reviewer’s Comment:	EIS provides Table 1.4 List of Potential Permit/Approval/Licence Requirements for the Project. Adopted codes such as National Building Code, Fire/Life Safety Code and DGSNL Plan review identified in table.
Response:	Thank you. No response required.
Supporting Documentation:	None

Response to DJPS 5

Comment ID:	DJPS 6
Department:	Justice and Public Safety, Fire and Emergency Services
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	S7.2 Plans (7.2.1 Emergency Response/Contingency Plan and 7.2.3 Hazardous Materials Response and Training Plan)
Reviewer’s Comment:	EIS provides Appendix 2-F Emergency Response Contingency Plan and Appendix 2-H Hazardous Materials Response and Training Plan. Both plans provide details into priorities, response guidelines, planning, equipment and training.
Response:	Thank you. The equipment list provided in the Emergency Response and Contingency Plan is planned to be located on site.
Supporting Documentation:	None

Response to DJPS 6

Comment ID:	DJPS 6
Department:	Justice and Public Safety, Fire and Emergency Services
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	S6.3 Accidents and Malfunctions
Reviewer’s Comment:	EIS covers approach to Accidents and Malfunctions including providing scenarios, effects and emergency response measures etc.
Response	Thank you. No response required.
Supporting Documentation	None

9.0 NL Department of Municipal and Provincial Affairs

The Newfoundland and Labrador (NL) Department of Municipal and Provincial Affairs (DMPA) has provided comments based on the review of the Project Environmental Impact Statement (EIS). Detailed comments and responses from World Energy GH2 (WEGH2) are provided in Section 9.1.

9.1 Detailed Comments

Response to DMPA 1

Comment ID:	DMPA 1
Department:	Municipal and Provincial Affairs
Branch/ Division:	
EIS Guidelines Reference (Where provided):	<p>A precise description of the geographic boundaries of the Project shall be presented in relation to the study area for each valued environmental component (VEC) (discussed in section 4.2). [...]</p> <p>This description shall focus on those aspects of the Project and its settings that are important in order to understand the potential environmental effects of the Project, and shall provide the following information:</p> <p>2.1 Study Area (a) ii: Municipal boundaries, planning areas and infrastructure</p>
Reviewer’s Comment:	<p>BSA-4 – 4.3.2.1 PG: 4.6-4.11</p> <ul style="list-style-type: none"> • See Comments in BSA-4 Document PG 4.6-4.11 • Mapping is deficient, does not clearly display Municipal Planning Areas or Municipal Boundaries or Protected Roads. BSA-4 Figure 4.2. • Revised maps would clearly illustrate components clearly overlaid over respective municipal boundaries and planning areas and/or protected roads at a “local level” scale as to see clearly defined features in relation to boundaries.
Response:	<p>WEGH2 has not received the review comments in BSA-4 to which DMPA is referring but would be pleased to review and discuss with DMPA if these comments have not been addressed in this EIS Amendment.</p> <p>Maps have been revised at a 1:50,000 scale or somewhat larger scale as needed (i.e., 1:55,000 scale, 1:70,000 scale, 1:110,000 scale, 1:115,000 scale) to clearly illustrate Project components overlaid with the respective municipal boundaries and planning areas and/or protected roads. The revised figures can be found in Appendix DMPA1-A, Mapbook – Land Use, as follows:</p> <ul style="list-style-type: none"> • Figure DMPA 1.1 – Land Use Zoning and Future Land Use Designations – Cape St. George • Figure DMPA 1.2 – Land Use Zoning and Future Land Use Designations – Port au Port West-Aguathuna-Felix Cove • Figure DMPA 1.3 – Land Use Zoning and Future Land Use Designations – Port au Port East • Figure DMPA 1.4A – Land Use Zoning – Kippens.

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Comment ID:	DMPA 1
	<ul style="list-style-type: none"> • Figure DMPA 1.4B – Future Land Use Designations – Kippens • Mapbook DMPA 1.5A1, DMPA1.5A2, DMPA1.5A3, DMPA1.5A4 – Land Use Zoning – Stephenville • Mapbook DMPA 1.5B1, DMPA1.5B2, DMPA1.5B3, DMPA1.5B4 – Future Land Use Designations – Stephenville • Figure DMPA 1.6 – Land Use Zoning and Future Land Use Designations – Stephenville Crossing • Figure DMPA 1.7 – Land Use Zoning and Future Land Use Designations – St. George’s
Supporting Documentation	Appendix DMPA 1-A, Mapbook – Land Use

Response to DMPA 2

Comment ID:	DMPA 2
Department:	Municipal and Provincial Affairs
Branch/ Division:	
EIS Guidelines Reference (Where provided):	<p>A precise description of the geographic boundaries of the Project shall be presented in relation to the study area for each valued environmental component (VEC) (discussed in section 4.2). [...]</p> <p>This description shall focus on those aspects of the Project and its settings that are important in order to understand the potential environmental effects of the Project, and shall provide the following information:</p> <p>2.1 Study Area (a) iii: communities and jurisdictions without municipal plans and development regulations</p>
Reviewer’s Comment:	<p>BSA-4 PG 4.6-4-11</p> <ul style="list-style-type: none"> • A list of LSD’s are provided on BSA-4 – 4.9 • Mapping could be clearer, however there are points indicating locations of LSD’s • Mapping could be improved to show’s which intersect the general vicinity of LSD’s, however LSD’s do not have defined spatial boundaries. <p>It is recommended that there be a range of mapping at appropriate scales (zoomed in) to interpret impacts of the valued environmental components in a more local context.</p>
Response:	Please see response to DMPA 1
Supporting Documentation	Appendix DMPA 1-A, Mapbook – Land Use

Response to DMPA 3

Comment ID:	DMPA 3
Department:	Municipal and Provincial Affairs
Branch/ Division:	
EIS Guidelines Reference (Where provided):	2.1 Study Area (b): identification of any project location overlap with existing land, freshwater and marine users, and municipal boundaries and planning areas
Reviewer’s Comment:	<p>BSA-2</p> <ul style="list-style-type: none"> • Aquatic Environment Base Line Study (Non-Applicable to MAPA’s mandate) <p>BSA-4 PG 4.6-4-11</p> <ul style="list-style-type: none"> • See Comments in BSA-4 Document PG 4.6-4.11 • Mapping is deficient, does not clearly display Municipal Planning Areas or Municipal Boundaries or Protected Roads. BSA-4 Figure 4.2
Response:	WEGH2 has not received the detailed review comments to which DMPA is referring but would be pleased to review and discuss with DMPA if these comments have not been addressed in this EIS Amendment. Please see response to DMPA 1 for updated mapping.
Supporting Documentation	Appendix DMPA 1-A, Mapbook – Land Use

Response to DMPA 4

Comment ID:	DMPA 4
Department:	Municipal and Provincial Affairs
Branch/ Division:	
EIS Guidelines Reference (Where provided):	<p>The Proponent shall describe the scope of the Project for which the EIS is being conducted including: the construction, operation, maintenance, foreseeable modifications of all Project- related facilities, and the closure, decommissioning and rehabilitation of Project sites.</p> <p>2.3.1 General Layout The EIS shall provide a written and graphic description (e.g. maps, aerial imagery and drawings) of the following physical features of the undertaking:</p> <p>2.3.1 (d): land use zoning and interactions with Project components for communities with approved municipal development plans;</p>
Reviewer’s Comment:	<p>BSA-4</p> <ul style="list-style-type: none"> • See Comments in BSA-4 Document PG 4.6-4.11 <p>Chapter 20, 20.2.2.1 (pg. 20.10-20.13)</p> <ul style="list-style-type: none"> • See comments relating to Municipal Land Use 20.10 Para 1 • See comments relating to Protected Roads 20.14

Project Nujio'Qonik: Amendment to the Environmental Impact Statement

Comment ID:	DMPA 4
	<ul style="list-style-type: none"> • Mapping is deficient, does not clearly display Municipal Planning Areas or Municipal Boundaries or Protected Roads. BSA-4 Figure 4.2. • Approval and Permitting section is accurate reflective of Municipal and Provincial Affairs Land Use Planning EA Response in 2022 for EA2202. • There should be a zoning map associated with the planning analysis of each municipality described under Municipal Land Use 20.10-20-13 in concert with VEC's. • There should be discussion regarding potential for non-compliance with established land use and the process for rezoning or amendment of land use plans and/or development regulations.
Response:	WEGH2 has not received the detailed review comments to which DMPA is referring but would be pleased to review and discuss with DMPA if these comments have not been addressed in this EIS Amendment. Please refer to response to DMPA 1 with respect to mapping edits and response to DMPA 5 with respect to non-compliance issues.
Supporting Documentation	None

Response to DMPA 5

Comment ID:	DMPA 5
Department:	Municipal and Provincial Affairs
Branch/ Division:	
EIS Guidelines Reference (Where provided):	2.3.5 Regulatory Framework and Government Oversight (e): municipal or provincial land use plans, land zoning, community plans, protected road zoning plans and regulations [...] that have been used by the Proponent to assist in the development of the EIS
Reviewer's Comment:	<p>Chapter 1, 1.3.3</p> <ul style="list-style-type: none"> • Table 1.4 See comment relating to Municipal Construction Permit. Should be Municipal Development Permit as Municipalities permit Development pursuant to the <i>Urban and Rural Planning Act, 2000</i>, Section 2(g). Further, Municipal Councils should be replaced with Municipal Authorities. • Table 1.4 See comment relating to Approval for Waste Disposal and License to Operate a Temporary Work Camp • Municipal Approvals are only listed for Stephenville, Town of Kippens and Town of Cape St. George, under 1.3.3. What about Port Au Port West-Aguathuna-Felix Cove, Port Au Port East, Kippens and Stephenville Crossing? Project components are listed in these municipalities. Any undertaking which fits the definition of Development under the <i>Urban and Rural Planning Act, 2000</i> is subject to Municipal Approval where a Municipal Planning Area exists with either <i>Interim Development Regulations</i> or a registered <i>Municipal Plan and Development Regulations</i> in legal effect.

Comment ID:	DMPA 5
	<ul style="list-style-type: none"> There should be discussion regarding potential for non-compliance with established land use and the process for rezoning or amendment of plans and development regulations.
Response:	<p>Table 1.4 of the EIS has been updated and included below as Table DMPA5.1 to address the first three bullets of the reviewer’s comments. The fourth bullet regarding potential non-compliance is addressed below.</p> <p>WEGH2 will apply for appropriate Municipal Development Permits for any undertaking which fits the definition of Development under the <i>Urban and Rural Planning Act, 2000</i> that is subject to Municipal Approval where a Municipal Planning Area exists with either <i>Interim Development Regulations</i> or a registered <i>Municipal Plan and Development Regulations</i> in legal effect.</p> <p>Potential for Non-compliance with Established Land Use</p> <p>There is potential for non-compliance with established land use plans and zoning where the proposed transmission line crosses development designations under Development Plans and zones in Development Regulations within Town boundaries that do not contemplate private utilities. The Town of Stephenville Crossing and the Town of St. George may, within any zone, permit land to be used in conjunction with the provision of public utilities if the use of the land is necessary to the proper operation of the public utility.</p> <p>WEGH2 will engage with local affected Municipal Authorities (Councils) with respect to permitted or discretionary use applications and municipal approvals where there is potential for non-compliance with established land use.</p> <p><i>Town of Cape St. George</i></p> <p>EIS Section 20.2.2.1 states the Town of Cape St. George Development Regulations (2013b) classify Utilities as a Discretionary Use in the RU (Rural) Zone, EP (Environmental Protection) Zone, and the PPWS (Protected Public Water Supply) Zone. All development in the RU Zone is to be approved by the Department of Government Services and Department of Natural Resources prior to permit issuance as per Condition 1: Development Standards of the RU Zone. Development in the EP Zone is subject to the approval of the Department of Environment and Conservation as well as the Authority (Town). Prior to permit issuance the Authority and any appropriate agencies shall ensure the development will not negatively affect the rare plants sites as indicated on Land Use Zoning Map 1. As per Condition 1, General Conditions and Referrals, all development in the PPWS Zone is subject to the approval of the Minister of Environment and Conservation. The application(s) in each Zone must be processed as a Discretionary Use and approved by council prior to permit issuance. Discretionary Use Application(s) must be submitted and advertised as per Section 83 and 23 of the Development Regulations.</p> <p><i>Town of Stephenville</i></p> <p>EIS Section 20.2.2.1 notes that development of transmission lines must be permitted by the Town of Stephenville Authority and are allowed in all Zones as per Section 2.1.13 of the Town’s Municipal Plan, 2014 on the condition they reflect the definition of Public Utility as defined by the <i>Public Utilities Act, 1990</i>, and Schedule C – Wellhead Protected Water Supply Area – Kippens (WPWSA-K) of the Town’s Development Regulations.</p>

Comment ID:	DMPA 5
	<p><i>Town of Kippens</i></p> <p>EIS Section 20.2.2.1 states that within the Town of Kippens, development of transmission lines must be processed as a Discretionary Use, approved by council as per Section 24 and 98 of the Town’s Development Regulations (2011). As per Condition 1 Development Standards of the Town’s Development Regulations, 2011 Schedule C-Rural, development in the Rural Zone shall be approved by the Department of Government Services, Department of Natural Resources, and other agencies or departments, as required, before a permit is issued by the Town.</p> <p><i>Town of Stephenville</i></p> <p>EIS Section 20.2.2.1 notes that, according to the Town of Stephenville’s Future Land Use Map (2014), the Hydrogen / Ammonia Plant – Port of Stephenville is located primarily in the Industrial General Zone with a portion of its eastern flank in the Rural Zone.</p> <p>Hazardous Industry is a Discretionary Use in the Industrial General Zone under the Town of Stephenville’s Development Regulations, 2014. A Discretionary Use Application must be made to the Town of Stephenville and processed as such under Section 109, 24 and 11 of the Development Regulations and Condition 4 of Schedule C: Use Zone Table – Industrial General Zone. Should the Town of Stephenville Council approve the Discretionary Use Application, a Development Permit must be issued by the Authority before any development commences as defined by the Urban and Rural Planning Act, 2000.</p> <p>Hazardous Industry is not a Permitted Use in the Rural Zone under the Town of Stephenville’s Development Regulations, 2014 except for Condition 3 of Schedule C: Use Zone Table – RU Zone (Town of Stephenville 2014a). Should the use be compliant with Condition 3 of Schedule C: Use Zone Table – RU Zone, as determined by the Towns Discretionary Powers under Section 11 of the Development Regulations the following approvals must be obtained prior to permit issuance: approval by appropriate Provincial agencies and departments, including the Forestry and Agrifoods Agency of the NL Department of Fisheries, Forestry and Agriculture (NLDFFA) and Mines Branch of the NL Department of Industry, Energy and Technology, and Digital Government and Service NL as per the Town’s Municipal Plan Policy 3.8.</p> <p>Should the use not be compliant with Condition 3 of Schedule C: Use Zone Table – RU Zone, as per Section 11 of the Development Regulations, the land must be rezoned to allow the subject use as either a permitted or discretionary use. Alternatively, the facility footprint can be altered to ensure all elements are solely within the Industrial General Designation. A Permit must be obtained before any work commences in both the Industrial General and Rural Zone.</p> <p>Notice of Application</p> <p><i>Town of Cape St. George; Town of Stephenville</i></p> <p>When a change in non-conforming use is to be considered, whether the development proposed is listed as a discretionary use in Schedule C of the Regulation, or where the Town is exercising its discretion under these Regulations, the Town is to give notice at the expense of the applicant (<i>or its own expense where necessary – Town of Cape St. George</i>) (<i>of the proposed development to all persons whose land is in the immediate vicinity of the land at least ten days prior to the date</i></p>

Comment ID:	DMPA 5
	<p><i>upon which Council will decide the matter – Town of Stephenville</i>), of an application for a permit or for Approval in Principle, by public advertisement in a local newspaper.</p> <p>Subject to these Regulations, the uses that fall within the Discretionary Use Classes set out in the appropriate Use Zone Table in Schedule C may be permitted in that Use Zone if the Town is satisfied that the development would not be contrary to the general intent and purpose of these Regulations, the Municipal Plan, or any further scheme or plan or regulation pursuant thereto, and to the public interest, and if the Town has given notice of the application in accordance with the Regulations and has considered any objections or representations which may have been received on the matter.</p> <p><i>Town of St. George’s</i></p> <p>When a change in non-conforming use is to be considered under Regulation, the Authority will, at the expense of the applicant, give notice of an application for a permit or for approval in principle, to all persons whose land is in the immediate vicinity of the land, at least 10 days prior to the date upon which Council will consider the matter (<i>Town of St. George’s</i>).</p> <p>When a proposed development listed as a discretionary use in Schedule C of the Regulations, and the Authority wishes to consider whether to approve such a discretionary use, the Authority will give written notice at the expense of the applicant of the proposed development to all persons whose land is in the immediate vicinity of the land, at least ten days prior to the date upon which Council will consider the matter (<i>Town of St. George’s</i>).</p> <p>Process for Rezoning or Amendment of Plans and Development Regulations</p> <p>WEGH2 will work with local affected Municipal Authorities (Councils) through the process for rezoning or amendment of applicable land use plans and/or development regulations with respect to Project development.</p> <p>Section 25 of the <i>Urban and Rural Planning Act, 2000</i> outlines the process to amend Plans, or Plans and Regulations, referred to as Plan Amendment Application (Re-designating Land). The general steps for a Plan Amendment Application are as follows (specific steps vary by Town and Council):</p> <p>A Municipal Council will give public notice of an application in locally circulated newspapers and will consider any representations or submissions received in response to the notification.</p> <p>Where an Applicant applies to re-designate land as represented on the Future Land Use Classes Map and in addition to the newspaper notice, Council will give written notice of the application to all owners of land within 200 m of the land that is subject of the application and will consider any representations or submissions received in response to the notification.</p> <p>Council will review the Plan Amendment Application in accordance with delegated Powers of Council for Review of Application or Request and will, in considering adoption under Section 16 of the Act (Adoption of Plan), take into account:</p> <ul style="list-style-type: none"> • Feedback from any and all forms of public consultation; • Where applicable, interests of provincial or other government departments or agencies; and

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Comment ID:	DMPA 5
	<ul style="list-style-type: none"> • Potential impacts of the proposed development on matters outlined under requirements for additional information or study: town infrastructure; compatibility with surrounding land uses; established character of the immediate neighbourhood; health, safety, and general well-being of residents of adjacent properties, the immediate neighbourhood, or the Town as a whole; and the natural environment. <p>Council will give public notice of the adoption and scheduled public hearing in accordance with Section 17 of the Act.</p> <p>In accordance with subsection 13(1) of the Act, Council will retain a professional planner to review and certify a proposed Plan amendment prior to considering the proposal for approval.</p> <p>If a public hearing is required under sections 18 to 21 of the Act, and in approving the amendment(s) under section 23 of the Act, Council will consider the written report and recommendation of the Commissioner of the public hearing in accordance with section 22 of the Act.</p> <p>If approved and registered, Council will give public notice of the amendment in a locally circulated newspaper and the <i>Gazette</i> in accordance with subsection 24(2) of the Act.</p> <p>In addition to the notice requirement, Council may post notice of registration on the Town’s website.</p> <p>An application to amend the Regulations only, referred to as Regulations Amendment Application shall be in accordance with subsection 35(5) of the Act (Re-zoning Land).</p> <p>In accordance with subsection 35(5) of the Act, Council will at minimum give public notice of the application in a locally circulated newspaper and will consider any representations or submissions received in response to that notification.</p> <p>Council may also give notice of the application to the broad community by posting the notice on the Town’s website.</p> <p>Where the Applicant applies to rezone land represented on the Zoning Map and in addition to the newspaper notice, Council will give written notice of the application to all owners of land within 100 m of the land that is subject of the application and will consider any representations or submissions received in response to that notification.</p> <p>Council may, in response to feedback received, hold a public meeting to consider objections and representations may by a person or an association of persons in response to the application.</p> <p>Council will review the Regulations amendment application, and will, in considering adoption, take into account:</p> <p>Feedback from any and all forms of public consultation; and</p>

Comment ID:	DMPA 5
	<p>Potential impacts of the proposed development on matters outlined under requirements for additional information or study:</p> <ul style="list-style-type: none"> town infrastructure; compatibility with surrounding land uses; established character of the immediate neighbourhood; health, safety, and general well-being of residents of adjacent properties, the immediate neighbourhood, or the Town as a whole; and the natural environment. <p>If adopted and registered, Council will give public notice of the amendment in a locally circulated newspaper and the <i>Gazette</i> in accordance with subsection 24(2) of the Act.</p> <p>In addition to the notice requirement, Council may post notice of registration on the Town’s website.</p> <p>In notifying and providing consultation opportunity to residents under the Plan Amendment application process, Towns shall:</p> <p>Indicate the person to whom written comments may be sent;</p> <p>State a place where and the hours during which the application and associated materials may be inspected by an interested person; and</p> <p>Allow 10 business days from the newspaper publication, mailing, or hand delivery date for accepting written comments relating to the application.</p> <p>In submitting written comments, residents should include two (2) copies with the following information for consideration by Council: Name, Signature, Date, and Civic Address.</p> <p>In accordance with Section 20 of the Act, two (2) copies of written comments are to be received by Council up to two (2) days before the tentative date of a public hearing for a proposed amendment to the Plan.</p> <p>In accordance with subsections 35(1)(i) of the Act, the cost of the public notice is borne by the Applicant.</p> <p>References:</p> <p>Port au Port West- West-Aguathuna-Felix Cove Development Regulations (2019-29), Port au Port East Development Regulations (2022-32), Town of Kippens Development Regulations (2023-33)</p> <p>Town of Cape St. George Development Regulations 2012, Town of Stephenville Development Regulations 2014, Town of Stephenville Crossing Development Regulations 2021 (formerly Newfoundland Regulation 3/01 [2001]), Town of St. George’s Development Regulations 2020 (formerly Newfoundland Regulation 3/01 [2001])</p>
Supporting Documentation	Table DMPA5.1 Updated Table 1.4 from the EIS

Table DMPA5.1 List of Potential Permit / Approval / Licence Requirements for the Project (Update to Table 1.4 of the EIS)

Permit / Approval / Licence	Legislation / Regulation	Authority / Department
Municipal		
Municipal Development Permit	<i>Urban and Rural Planning Act, 2000 (Section 2(g)); Municipal Plan and Development Regulations</i>	Municipal Authorities
Approval for Waste Disposal	<i>Municipal Plan and Development Regulations</i>	Municipal Authorities
Licence to Operate a Temporary Work Camp	<i>Municipal Plan and Development Regulations</i>	Municipal Authorities
Development of Transmission Lines	Town of Stephenville <i>Development Regulations</i>	Town of Stephenville
Discretionary Use Application(s) Municipal Approval	Town of Stephenville Municipal Plan and <i>Development Regulations</i>	Town of Stephenville
Discretionary Use Application(s) Municipal Approval	Town of Kippens Municipal Plan and <i>Development Regulations</i>	Town of Kippens
Discretionary Use Application(s) Municipal Approval	Town of Cape St. George Municipal Plan and <i>Development Regulations</i>	Town of Cape St. George
Discretionary Use Application(s) Municipal Approval	Town of Port Au Port West-Aguathuna-Felix Cove Municipal Plan	Town of Port Au Port West-Aguathuna-Felix Cove
Discretionary Use Application(s) Municipal Approval	Town of Port Au Port East Municipal Plan and <i>Development Regulations</i>	Town of Port Au Port East
Discretionary Use Application(s) Municipal Approval	Town of Stephenville Crossing Municipal Plan and <i>Development Regulations</i>	Town of Stephenville Crossing
Provincial		
Environmental Assessment Approval	<i>Environmental Protection Act</i>	NLDECC, EA Division
Permit to Engage in an Economic Activity under the <i>Endangered Species Act</i>	<i>Endangered Species Act</i>	Newfoundland and Labrador Department of Fisheries, Forestry and Agriculture (NLDFFA), Wildlife Division
Permit to Control Nuisance Animals	<i>Wild Life Act</i>	NLDFFA, Wildlife Division
Certificate of Approval for Generator Operation	<i>Environmental Protection Act, Air Pollution Control Regulations</i>	NLDECC; Pollution Prevention Division Industrial Compliance Section

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Permit / Approval / Licence	Legislation / Regulation	Authority / Department
Application for Environmental Permit for Alterations to a Body of Water	<i>Water Resources Act</i>	NLDECC, Water Resources Management Division
Certificate of Approval for Transportation of Waste Dangerous Goods / Hazardous Waste	<i>Environmental Protection Act</i>	NLDECC; Pollution Prevention Division, Waste Management Section
Certificate of Approval for Construction / Operation of an Industrial Facility	<i>Environmental Protection Act</i>	NLDECC; Pollution Prevention Division Industrial Compliance Section
Approval for Waste Disposal	<i>Urban and Rural Planning Act, 2000</i>	NL Department of Municipal and Provincial Affairs
Licence to Operate a Temporary Work Camp	<i>Urban and Rural Planning Act, 2000</i>	NL Department of Municipal and Provincial Affairs
Development of Transmission Lines	<i>NL Public Utilities Act, 1990</i>	Board of Commissioners of Public Utilities
Environmental Approval for a Waste Management System	<i>Environmental Protection Act, Air Pollution Control Regulations, Storage of PCB Wastes Regulations and Waste Management Regulations, 2003</i>	Digital Government and Service NL
Development Activity in a Protected Water Supply Area	<i>Water Resources Act</i>	NLDECC, Water Resources Management Division
Permit for Constructing a Non-domestic Well	<i>Water Resources Act</i>	NLDECC, Water Resources Management Division
Application for Water Use Licence	<i>Water Resources Act</i>	NLDECC, Water Resources Management Division
Requirement for Permit Prior to Construction, Extension, Change to Sewage Systems	<i>Water Resources Act</i>	NLDECC, Water Resources Management Division
Permit to Cut	<i>Forestry Act</i>	NLDFFA, Forestry Division
Permit to Burn	<i>Forestry Act</i>	NLDFFA, Forestry Division
Operating Permit	<i>Forestry Act</i>	NLDFFA, Forestry Division
Licence to Lease (or Grant) Crown Lands	<i>Lands Act</i>	NLDFFA, Crown Lands

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Permit / Approval / Licence	Legislation / Regulation	Authority / Department
Highway Access Permit	<i>Works, Services and Transportation Act</i>	NL Department of Transportation and Infrastructure (NLDIET), Government Services Centre
Protected Road / Area	<i>Protected Road Zoning Regulations</i>	NLDIET, Government Services Centre
Quarry Permit	<i>Quarry Materials Act</i>	NLDIET, Mining and Mineral Development
Certificate of Approval for a Sewage / Septic System	<i>Health and Community Services Act</i>	Digital Government and Service NL
Electrical System Interconnection	<i>Electrical Power Control Act</i>	NL Hydro / Public Utilities Board of NL
Fuel and Associated Products Storage Tank Registration	<i>Environmental Protection Act, Storage and Handling of Gasoline and Associated Products Regulations, 2003</i>	Digital Government and Service NL
National Building Code –Fire, Life Safety and Building Safety	<i>Buildings Accessibility Act</i>	Digital Government and Service NL
National Building Code – Fire, Life Safety and Building Safety	<i>Fire Protection and Services Act</i>	NL Department of Justice and Public Safety
Buildings Accessibility Registration and Permit or Building Accessibility Exemption Registration and National Building Code of Canada Plans Review	<i>Buildings Accessibility Act</i>	Digital Government and Service NL
Food Establishment License	<i>Food Premises Act / Smoke-Free Environment Act</i>	Digital Government and Service NL
Fuel Storage Tank Registration	<i>Storage and Handling of Gasoline and Associated Products Regulations, 2003, under the Environmental Protection Act</i>	Digital Government and Service NL
Electrical Permits	<i>Public Safety Act, Electrical Regulations</i>	Digital Government and Service NL
Blasters Safety Certificate	<i>Occupational Health and Safety Act</i>	Digital Government and Service NL
Pressure Piping System Registration	<i>Public Safety Act, Pressure Vessel and Compressed Gas Regulations</i>	Digital Government and Service NL
Pressure Plant Registration	<i>Public Safety Act, Pressure Vessel and Compressed Gas Regulations</i>	Digital Government and Service NL
Pressure System Permits (including Pressure Plan and, Pressure Piping System Registrations)	<i>Public Safety Act, Pressure Vessel and Compressed Gas Regulations</i>	Digital Government and Service NL

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Permit / Approval / Licence	Legislation / Regulation	Authority / Department
Requirements for Elevating Devices to be Registered Prior to Installation and Inspected / Approved with a Certificate Issued Prior to Operation.	<i>Public Safety Act</i>	Digital Government and Service NL
Electrical Connection to Provincial Grid	<i>Public Utilities Act, Electrical Power Control Act, 1994</i>	NL Hydro / Board of Commissioners of Public Utilities
Project will likely require an exemption from subsection 14.1(2)	<i>Electrical Power Control Act, 1994</i>	Lieutenant-Governor in Council under the authority of subsection 14.1(7) of the Act
Federal		
Permits Authorizing an Activity Affecting Listed Wildlife Species	<i>Species at Risk Act</i>	ECCC, Parks Canada
Migratory Bird Permit	<i>Migratory Birds Convention Act</i>	ECCC - Canadian Wildlife Service
Nest Removal Permit	<i>Migratory Birds Convention Act</i>	ECCC - Canadian Wildlife Service
Authorization or Letter of Advice pursuant to section 35(2) of the <i>Fisheries Act</i>	<i>Fisheries Act</i>	Fisheries and Oceans Canada
Marine Terminal Approval	Technical Review Process of Marine Terminal Systems and Transshipment	Transport Canada / Canadian Coast Guard, ECCC, Fisheries and Oceans Canada, Natural Resources Canada, Port Authorities and Pilotage Authorities
License to Store, Manufacture, or Handle Explosives	<i>Explosives Act</i>	Natural Resources Canada
Land Use Approval	<i>Civil Air Navigation Services Commercialization Act</i>	Nav Canada ¹
Aeronautical Assessment Obstacle Evaluation	<i>Aeronautics Act; Canadian Aviation Regulations</i>	Transport Canada
Emergency Response Assistance Plan	<i>Transport of Dangerous Goods Act</i>	Transport Canada
Review or approval pursuant to section 4 or 5 under <i>Canadian Navigable Water Act</i>	<i>Canadian Navigable Water Act</i>	Transport Canada
Dredging of Harbour	<i>Canadian Environmental Protection Act, 1999 (Schedule 5, Waste or Other Matter)</i>	ECCC

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Permit / Approval / Licence	Legislation / Regulation	Authority / Department
Storage Tank Regulations	<i>Canadian Environmental Protection Act, 1999, Storage Tank Systems for Petroleum Products and Allied Petroleum Products Regulations</i>	ECCC
Notice Regarding Substances Located at a Facility and Preparation of an Environmental Emergency Plan ²	<i>Environmental Emergency Regulations, 2019</i>	ECCC
Reporting Requirements of the National Pollutant Release Inventory (NPRI) ³	<i>Canadian Environmental Protection Act, 1999</i>	ECCC
<p>Notes:</p> <p>¹ Nav Canada is a private, not for profit corporation that manages Canada's civil air navigation.</p> <p>² May be excluded if it is a substance that is regulated under the <i>Transportation of Dangerous Goods Act, 1992</i> or the <i>Canada Shipping Act, 2001</i>, which applies to anhydrous ammonia</p> <p>³ Ammonia is a NPRI Core Substance.</p>		

Response to DMPA 6

Due to a duplication of comments during response preparation, DMPA 6 is intentionally left blank.

Response to DMPA 7

Comment ID:	DMPA 7
Department:	Municipal and Provincial Affairs
Branch/ Division:	
EIS Guidelines Reference (Where provided):	2.3.5 Regulatory Framework and Government Oversight (f): any governmental or non- governmental working groups or committees that provide guidance to municipal and or provincial bodies with respect to land use [...] in the Project area.
Reviewer's Comment:	Chapter 1, 1.3.5 No issues
Response:	Thank you for confirmation that requirements were addressed in the EIS. No further response required.
Supporting Documentation	None

Response to DMPA 8

Comment ID:	DMPA 8
Department:	Municipal and Provincial Affairs
Branch/ Division:	
EIS Guidelines Reference (Where provided):	The EIS shall describe relevant land and resource use within the study area of these, including but not limited to the following: h) Land tenure, including but not limited the following: 4.2.4 Existing Environment (Land and Resource Use) (h)(iv) Municipalities with municipal plan and development regulations
Reviewer’s Comment:	Chapter 20, 10.5.2 <ul style="list-style-type: none"> • 10.5.2 may be an error, under Chapter 20 there is no 10.5.2 and under Chapter 10, 10.5.2 is Change in Fish Habitat Quality • See comments relating to Municipal Land Use 20.10 Para 1 • See comments relating to Protected Roads 20.14 • Mapping is deficient, does not clearly display Municipal Planning Areas or Municipal Boundaries or Protected Roads. BSA-4 Figure 4.2. • Approval and Permitting section is accurate reflective of Municipal and Provincial Affairs Land Use Planning EA Response for 2202 in 2022. • Should discuss any potential non-compliance with established land use plans and zoning, describe process for rezoning or amendment.
Response:	WEGH2 has not received the detailed review comments to which DMPA is referring but would be pleased to review and discuss with DMPA if these comments have not been addressed in this EIS Amendment. Please see response for DMPA 1 for improved mapping and response for DMPA 5 for a discussion of potential non-compliance and the process for rezoning or amendment.
Supporting Documentation	None

Response to DMPA 9

Comment ID:	DMPA 9
Department:	Municipal and Provincial Affairs
Branch/ Division:	
EIS Guidelines Reference (Where provided):	4.2.6 Communities (g) Active municipal, governmental or non- governmental working groups or committees
Reviewer’s Comment:	<p>Chapter 18, 18.2.2</p> <ul style="list-style-type: none"> 18.2.2 does not provide for Active municipal governmental or non-governmental working groups or committees. <p>Chapter 20, 20.2.2</p> <ul style="list-style-type: none"> 20.2.2 does not provide for Active municipal governmental or non-governmental working groups or committees 20.2.2 provides the approval process for project components with regards to municipal land use and a description of existing conditions with respect to: land and property ownership, designated lands and parks, municipal land use, public protected water supply areas and water supply infrastructure, protected roads, provincial crown lands, protected areas, private nature reserves, wildlife management areas.
Response:	<p>Table 4.1 of Chapter 4 (Consultation and Engagement) in the EIS lists the key Project stakeholders and groups, including municipal governmental or non-governmental working groups and committees. These are:</p> <p>Associations and Groups: Bay St. George all-terrain vehicle (ATV) and Snowmobile Association Bay St. George South Historical Society Business Organizations Bay St. George South Area Development Association Bay St. George Chamber of Commerce Codroy Valley Area Development Association Kruger (Corner Brook Pulp and Paper) Long Range Small Business Committee MOWI NLOA NL Organization of Women Entrepreneurs St. John’s Board of Trade Stephenville Business Improvement Association Alliances and Associations NARMN (NL Alliance of Rural Mi’kmaq Nations) NL Indigenous Peoples’ Alliance Newfoundland Aboriginal Women’s Network</p>

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Comment ID:	DMPA 9
	<p>Indigenous Groups/Local Band Councils: Qalipu First Nation Benoit First Nation (Port au Port) Flat Bay Mi’kmaq Band (Flat Bay) Indian Head First Nation (Stephenville) Port au Port Mi’kmaq Band (Port au Port) St. George’s Indian Band (St. George’s) Three Rivers Mi’kmaq Band (Bay St. George South) Miawpukek First Nation</p>
Supporting Documentation	None

Response to DMPA 10

Comment ID:	DMPA 10
Department:	Municipal and Provincial Affairs
Branch/ Division:	
EIS Guidelines Reference (Where provided):	4.3.1 C (ii) The baseline study shall assess and report on ambient vibrations at each of the wind energy sites, and shall provide the distance of the nearest wind turbines to, at a minimum, the following features: ii municipal boundaries, planning areas and infrastructure
Reviewer’s Comment:	<p>BSA-1, 3.3 Figure 2.1</p> <ul style="list-style-type: none"> • Insufficient, BAS-1, 3.3 inclusive of includes 7 sites, does not provide any information with respect to the distance of the nearest wind turbine(s) to municipal boundaries or planning areas. • Figure 2.1 does provide a spatial representation of testing sites however does not note whether the locations are within a jurisdiction with a municipal boundary or municipal planning area • Clarity as to each of the wind energy sites is required, is this each “wind farm” or “individual turbine” location.
Response:	<p>Maps have been revised at a 1:50,000 scale to clearly illustrate noise and vibration monitoring locations in relation to Project components within municipal boundaries or planning areas (Appendix DMPA10–A Noise and Vibration Monitoring Locations).</p> <p>The number of turbines within municipalities and distances from the nearest turbine to municipal boundaries and planning areas are presented in Table DMPA10.1 below. These distances are based on the updated turbine layout for the Port au Port Wind Farm as described in Section 2.5 of this EIS Amendment.</p>
Supporting Documentation	Table DMPA10.1 Number of Turbines within and Distances from Turbines to Municipal Boundaries or Planning Area Appendix DMPA10–A Noise and Vibration Monitoring Locations

Table DMPA10.1 Number of Turbines within and Distances from Turbines to Municipal Boundaries or Planning Areas

Community	Approximate Distance of Nearest Turbine (km)	Approximate Distance of Nearest Turbine to Municipal Boundary (km)	Approximate Distance of Nearest Turbine to LUZ*/FLU* Areas (km)
Municipality of Cape St. George-Petit Jardin-Grand Jardin-De Grau-Marches Point-Loretto		14 turbines within	23 turbines within
Cape St. George	3.40		
Petit Jardin	2.20		
Grand Jardin	1.51		
De Grau	1.63		
Marches Point	1.89		
Loretto	1.62		
Sheaves Cove	1.40		
Lower Cove	3.36		
Ship Cove	1.81		
Jerry's Nose	2.38		
Abrahams Cove	1.21		
Campbells Creek	1.40		
Municipality of Port au Port West-Aguathuna-Felix Cove		2 turbines within	2 turbines within
Man of War Cove	1.35		
Felix Cove	2.05		
Bellmans Cove	3.25		
Aguathuna	2.67		
Mainland	1.53		
Three Rock Cove	1.28		
Lourdes	3.04		
Winterhouse	9.27		
Black Duck Brook	11.73		
Tea Cove	4.90		
West Bay	2.54		
West Bay Centre	1.15		
Piccadilly Head	1.51		
Piccadilly Slant	2.51		
Piccadilly	1.29		
Boswarlos	2.35		

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Community	Approximate Distance of Nearest Turbine (km)	Approximate Distance of Nearest Turbine to Municipal Boundary (km)	Approximate Distance of Nearest Turbine to LUZ*/FLU* Areas (km)
Municipality of Port au Port East			
Port au Port		5.38	5.33
Romaines			
Municipality of Kippens	8.07	8.07	5.81
Municipality of Stephenville	8.14	8.14	1.46
Cold Brook	7.69		
Noels Pond	11.91		
Black Duck Siding	17.58		
Black Duck	18.23		
Pointau Mal	2.65		
Fox Island River	5.22		
Municipality of Stephenville Crossing	14.57	14.57	14.62
Whites Road	17.80		
Mattis Point	23.60		
Barchois Brook	25.88		
Municipality of St. George’s	26.67	23.41	20.35
Seal Rocks	26.14		
Shallop Cove	24.46		
Sandy Point	23.97		
Flat Bay	22.72		
Flat Bay West	22.02		
Notes: LUZ* – Land Use Zone; FLU* – Future Land Use			

Response to DMPA 11

Comment ID:	DMPA 11
Department:	Municipal and Provincial Affairs
Branch/ Division:	
EIS Guidelines Reference (Where provided):	4.3.1 C (iii) The baseline study shall assess and report on ambient vibrations at each of the wind energy sites, and shall provide the distance of the nearest wind turbines to, at a minimum, the following features: iii communities and jurisdictions without municipal plans and development regulations.
Reviewer’s Comment:	BSA-1, 3.3 Figure 2.1 <ul style="list-style-type: none"> Figure 2.1 does provide a spatial representation of testing sites however does not note whether the locations are in a community or jurisdiction without municipal plans and development regulations
Response:	See response to DMPA 10 and revised figures in Appendix DMPA10–A Noise and Vibration Monitoring Locations
Supporting Documentation	Appendix DMPA10– Noise and Vibration Monitoring Locations

Response to DMPA 12

Comment ID:	DMPA 12
Department:	Municipal and Provincial Affairs
Branch/ Division:	
EIS Guidelines Reference (Where provided):	4.3.4 Land and Resource Use: The baseline study of land and resource use shall focus on, at minimum, the following components:
Reviewer’s Comment:	BSA-4, 4.2.2, 4.3.2, 4.3.3, 4.3.4 No issues
Response:	Thank you for confirmation that requirements were addressed in the EIS. No further response required.
Supporting Documentation	None

Response to DMPA 13

Comment ID:	DMPA 13
Department:	Municipal and Provincial Affairs
Branch/ Division:	
EIS Guidelines Reference (Where provided):	(a) Land use may be positively or negatively affected by changes to the physical and socioeconomic environment.[...] Consultation, including surveys and interviews, with the public, municipalities, local service districts
Reviewer’s Comment:	<p>Chapter 20, 20.5</p> <p>Section 20.2.2.1 best covers municipal zoning, permitted/discretionary use in designated zones and permissibility of project features that overlap municipal zones.</p> <ul style="list-style-type: none"> • Section 20.5 Change in Designated Land Use considers project activities that may be incompatible with designated land use. • Provides general statements about land use interactions however does not provide specifics regarding permissibility of project features that overlap municipal zones. This is provided in • 20.2.2.1 reflective of MAPA’s EA Referral response. • Spatial area of MPA intersect is provided • Protected roads are included however some inaccuracies exist as noted on 20.51 or pg. 463 of the EIS submission. • Should mention process for addressing project components which are non-compliant as a permitted or discretionary use within established land use zones as per registered Municipal Plans and Development Regulations under Section 24 of the <i>Urban and Rural Planning Act, 2000</i>. Should provide information as to rezoning of lands if required/ amendment of <i>Municipal Plans and Development Regulations</i> pursuant to Section 25 of the <i>Urban and Rural Planning Act, 2000</i>.
Response:	<p>WEGH2 has not received the detailed review comments to which DMPA is referring but would be pleased to review and discuss with DMPA if these comments have not been addressed in this EIS Amendment.</p> <p>WEGH2 will apply for appropriate Municipal Development Permits for any undertaking which fits the definition of Development under the <i>Urban and Rural Planning Act, 2000</i> that is subject to Municipal Approval where a Municipal Planning Area exists with either <i>Interim Development Regulations</i> or a registered <i>Municipal Plan and Development Regulations</i> in legal effect.</p> <p>Discretionary Use Applications</p> <p>WEGH2 will also engage with local affected Municipal Authorities (Councils) with respect to permitted or discretionary use applications and municipal approvals where there is potential for non-compliance with established land use.</p>

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Comment ID:	DMPA 13
	<p><i>Town of Cape St. George; Town of St. George’s; Town of Stephenville; Town of Stephenville Crossing</i></p> <p>Subject to the Regulations, the uses that fall within the Discretionary Use Classes set out in the appropriate Use Zone Table in Schedule C may be permitted in that Use Zone if the Town is satisfied that the development would not be contrary to the general intent and purpose of these Regulations, the Municipal Plan, or any further scheme or plan or regulation pursuant thereto, and to the public interest, and if the Town has given notice of the application and has considered any objections or representations which may have been received on the matter.</p> <p><i>Town of Port au Port West-Aguathuna-Felix Cove; Town of Port au Port East; Town of Kippens</i></p> <p>A discretionary use application applies to uses under those discretionary uses noted in Use Zone tables and to developments otherwise specified in Development Regulations.</p> <p>Council will review a discretionary use application for conformance with the Regulations, and any other plan, scheme, or regulation; and consider the potential impacts of the proposed development.</p> <p>Council will give written notice of the application to all owners within 50 m of the land that is the subject of the application and will consider any representations or submissions received in response to the notification.</p> <p>Approval of a discretionary use application may be in conjunction with the issuance of a development permit.</p> <p>Council will render a decision on a discretionary use application in the same manner as a development application.</p> <p>Despite conformance of any proposed development with the Development Regulations, a Council has discretionary power to refuse or attach conditions to a development permit or approval in principle.</p> <p>Rezoning or Amendment Applications</p> <p>WEGH2 will work with local affected Municipal Authorities (Councils) through the process for rezoning or amendment of applicable land use plans and/or development regulations with respect to Project development.</p> <p>See response to DMPA 5 for description of process for rezoning lands if required under an amendment pursuant to Section 25 of <i>the Urban and Rural Planning Act, 2000</i>.</p>
Supporting Documentation	None

Response to DMPA 14

Comment ID:	DMPA 14
Department:	Municipal and Provincial Affairs
Branch/ Division:	
EIS Guidelines Reference (Where provided):	6.2 (f)(vi): Effects of the Project on land use and tenure, including: vi. Municipal zoning, permitted/discretionary use in designated zones and permissibility of Project features that overlap municipal zones
Reviewer’s Comment:	<p>Chapter 20, 20.4</p> <ul style="list-style-type: none"> • Chapter 20 Table 20.4 does not include any information relating to 7.1(f)(vi) • Should describe discretionary use process and public consultation • Should describe the process for amending a municipal plan and development regulations. • Appendix 26-A, root document to Table 20.4 appears deficient with respect to the requirements of 7.1(f)(vi)
Response:	<p>Mitigation measures to address potential land use conflicts with respect to Municipal zoning, permitted and discretionary uses include the following:</p> <ul style="list-style-type: none"> • WEGH2 will apply for appropriate Municipal Development Permits for any undertaking which fits the definition of Development under the <i>Urban and Rural Planning Act, 2000</i> that is subject to Municipal Approval where a Municipal Planning Area exists with either <i>Interim Development Regulations</i> or a registered <i>Municipal Plan and Development Regulations</i> in legal effect. • WEGH2 will engage with local affected Municipal Authorities (Councils) with respect to discretionary use applications and municipal approvals where there is potential for non-compliance with established land use. • WEGH2 will work with local affected Municipal Authorities (Councils) through the process for rezoning or amendment of applicable land use plans and/or development regulations with respect to Project development. <p>Please see responses for DMPA 5 and DMPA 13 for description of municipal plan and development regulations amendment process and discretionary use process.</p>
Supporting Documentation	None

Response to DMPA 15

Comment ID:	DMPA 15
Department:	Municipal and Provincial Affairs
Branch/ Division:	
EIS Guidelines Reference (Where provided):	General
Reviewer’s Comment:	<ul style="list-style-type: none"> Recommended proponent review the Table of Concordance and EIS Requirements, then update document to reflect requirements as noted in this document and update the Table of Concordance appropriately.
Response:	Acknowledged.
Supporting Documentation	None

Response to DMPA 16

Comment ID:	DMPA 16
Department:	Municipal and Provincial Affairs
Branch/ Division:	
EIS Guidelines Reference (Where provided):	General
Reviewer’s Comment:	<ul style="list-style-type: none"> EIS provides overview of policy and regulatory analysis with regards to Municipal Plans and Development Regulations in BSA-4 document reflective of MAPA’s EA 2202 Referral submission. However, mapping should accompany each municipal policy and regulatory analysis. Also, a section on describing the municipal plan and development regulations amendment process should be included.
Response:	<p>See response for DMPA 1 with respect to revised mapping for each Town. Summaries of each municipal plan and development regulations amendment process are provided below.</p> <p>Town of Cape St. George</p> <p>The Cape St. George Land Use Zoning and Future Land Use Designations (Figure DMPA1.1 in Appendix DMPA1-A), indicates that the proposed wind turbines, collector lines, and access roads are zoned and designated as “Rural” and “Highway Reserve”. A short section of access road is zoned and designated as “Protected Public Water Supply”. The Town of Cape St. George Development Regulations classify Utilities as a Discretionary Use in the RU (Rural) Zone, EP (Environmental Protection) Zone, and the PPWS (Protected Public Water Supply) Zone. All development in the RU Zone is to be approved by the Department of Government Services and Department of Natural Resources prior to permit issuance as per Condition 1: Development Standards of the RU Zone.</p>

Comment ID:	DMPA 16
	<p>Development in the EP Zone is subject to the approval of the Department of Environment and Conservation as well as the Authority (Town). Prior to permit issuance the Authority and any appropriate agencies shall ensure the development will not negatively affect the rare plants sites as indicated on Land Use Zoning Map 1. As per Condition 1, General Conditions and Referrals, all development in the PPWS Zone is subject to the approval of the Minister of Environment and Conservation. The application(s) in each Zone must be processed as a Discretionary Use and approved by council prior to permit issuance. Discretionary Use Application(s) must be submitted and advertised as per Section 83 and 23 of the Town’s Development Regulations.</p> <p>Port au Port West-Aguathuna-Felix Cove</p> <p>Land Use Zoning and Future Land Use Designations – Port au Port West-Aguathuna-Felix Cove Figure DMPA1.2 (Appendix DMPA1-A) shows the proposed transmission line and access road zoned and designated as “Rural” and “Mining and Quarrying”. Appendix C of the Development Regulations Use Group - Utilities includes the terms (undefined) Commercial Wind Farm and Power as examples of Public Utilities (defined). Within the Municipal Planning Area, the high voltage transmission line will intersect the Community Development (CD) and RU (Rural) Zone. A 230 kV Riser Substation (and a transition from overhead to underground lines) will also be in the RU Zone. In the CD Zone Public Utilities inclusive of commercial wind farms and cables are permitted uses. In the RU Zone all utility uses are permitted uses. As per Section A.1.6 General Prohibitions and Section A 2.1.4 Issuance of Development Permit – Delegated Employee (General Prohibitions) an application must be submitted to the Authority (i.e., municipality) and permit issued prior to works commencing.</p> <p>Town of Port au Port East</p> <p>Land Use Zoning and Future Land Use Designations – Port au Port East Figure DMPA1.3 (Appendix DMPA1-A) shows the proposed transmission lines zoned and designated as “Conservation”, “Residential”, “Community Development”, “Rural”, and “Water Supply”. Access roads are zoned and designated as “Rural” and “Conservation” and collector lines are zoned and designated as “Conservation”. Subject to the Town of Port au Port East Municipal Plan Policy B.2.6 and Development Regulations Section E.2 Use Zone Regulations, proposed transmission lines and substations are permitted in all use zones subject to an application being made by the proponent and permit issued by the Authority.</p> <p>Town of Kippens</p> <p>The Kippens Land Use Zoning Figure DMPA1.4A and Future Land Use Designations Figure DMPA1.4B (Appendix DMPA1-A) both indicate the proposed transmission line zoned and designated as “Conservation” and “Rural Resource”. The Town of Kippens Development Regulations, 2011 Schedule C - Rural Use Zone Table classifies Utilities as a Discretionary Use Class, reflecting Municipal Plan Policy 4.5. Development of transmission lines must be processed as a Discretionary Use, approved by council as per Section 24 and 98 of the Town’s Development Regulations (see response to DMPA 13 for a description of the Discretionary Use application process). As per Condition 1 Development Standards of the Town’s Development Regulations, 2011 Schedule C-Rural, development in the Rural Zone shall be approved by the Department of</p>

Comment ID:	DMPA 16
	<p>Government Services, Department of Natural Resources, and other agencies or departments as required before a permit is issued by the Town.</p> <p>Town of Stephenville Crossing</p> <p>The Stephenville Crossing Land Use Zoning and Future Land Use Designations Figure DMPA1.6 (Appendix DMPA1-A) indicates the proposed transmission line zoned and designated as “Residential”, “Environmental Protection”, “Flood”, “Industrial”, and “Rural”. Subject to the Town of Stephenville Crossing Municipal Plan Policy 6.2.6 and Section 55 of the Town’s Development Regulations, 2021, proposed transmission lines are permitted uses in all zones subject to an application being made by the proponent and permit issued by the Authority.</p> <p>Town of St. George’s</p> <p>Land Use Zoning and Future Land Use Designations – St. George’s Figure DMPA1.7 (Appendix DMPA1-A) show the proposed transmission line zoned and designated as “Rural” and “Protected Public Water Supply”. Subject to Section 55 of the Town of St. George’s Development Regulations, 2021, proposed transmission lines are permitted uses in all zones subject to an application being made by the proponent and permit issued by the Authority. Further as per Section 54 and Section 6.1.11 of the Town of St. George Municipal Plan, any application for development within the Nalcor Corridor is to be submitted to Nalcor for approval before any permit is issued by the Authority.</p> <p>Town of Stephenville</p> <p>The Stephenville Land Use Zoning Mapbook DMPA1.5A1 to DMPA1.5A4 (Appendix DMPA1-A) shows the proposed transmission line zoned variously as “Rural”, “Environmental Protection”, “Residential”, “Protected Public Water Supply”, “Commercial”, “Flood”, and “Industrial”. The Stephenville Future Land Use Designations Mapbook DMPA1.5B1 to DMPA1.5B4 (Appendix DMPA1-A) shows the proposed transmission line designated variously as “Rural”, “Environmental Protection”, “Residential”, “Protected Public Water Supply”, “Community Services”, “Flood”, and “Industrial”.</p> <p>The proposed Hydrogen/ Ammonia plant is zoned and designated as “Industrial”. Subject to the Town of Stephenville’s Municipal Plan Policy 6.2.6 and Section 55 of the Town’s Development Regulations, 2021, proposed transmission lines are permitted uses in all zones subject to an application being made by the proponent and permit issued by the Authority.</p> <p>Hazardous Industry is a Discretionary Use in the Industrial General Zone under the Town of Stephenville’s Development Regulations, 2014. A Discretionary Use Application must be made to the Town of Stephenville and processed as such under Section 109, 24 and 11 of the Development Regulations and Condition 4 of Schedule C: Use Zone Table – Industrial General Zone. Should the Town of Stephenville Council approve the Discretionary Use Application, a Development Permit must be issued by the Authority before any development commences as defined by the Urban and Rural Planning Act.</p> <p>Hazardous Industry is not a Permitted Use in the Rural Zone under the Town of Stephenville’s Development Regulations, 2014 except for Condition 3 of Schedule C: Use Zone Table – RU Zone (Town of Stephenville 2014a). Should the use be compliant with Condition 3 of Schedule C: Use Zone Table – RU Zone, as determined by the Towns Discretionary Powers under Section 11 of the</p>

Comment ID:	DMPA 16
	<p>Development Regulations the following approvals must be obtained prior to permit issuance: approval by appropriate Provincial agencies and departments, including the Forestry and Agrifoods Agency of the NL Department of Fisheries, Forestry and Agriculture (NLDDFA) and Mines Branch of the NL Department of Industry, Energy and Technology, and Service NL as per Municipal Plan Policy 3.8 (Town of Stephenville 2014b).</p> <p>Should the use not be compliant with Condition 3 of Schedule C: Use Zone Table – RU Zone, as per Section 11 of the Development Regulations, the land must be rezoned to allow the subject use as either a permitted or discretionary use. Alternatively, the facility footprint can be altered to ensure all elements are solely within the Industrial General Designation. A Permit must be obtained before any work commences in both the Industrial General and Rural Zone.</p> <p>Please see response to DMPA5 for a description of the municipal plan and the development regulations amendment process.</p> <p>References:</p> <p>Town of Cape St. George. 2012a. Town of Cape St. George Development Regulations, December 2013. Town of Cape St. George, NL.</p> <p>Town of Cape St. George. 2012b. Town of Cape St. George Municipal Plan, February 2013. Town of Cape St. George, NL.</p> <p>Town of Kippens. 2011a. Town of Kippens Development Regulations, June 2012. Town of Kippens, NL.</p> <p>Town of Kippens. 2011b. Town of Kippens Municipal Plan, June 2012. Town of Kippens, NL.</p> <p>Town of Port au Port East. 2022a. Town of Port au Port East Development Regulations (2022-32), August 2022. Town of Port au Port East, NL.</p> <p>Town of Port au Port East. 2022b. Town of Port au Port East Municipal Plan (2022-32), August 2022. Town of Port au Port East, NL.</p> <p>Town of Port au Port West – Aguathuna – Felix Cove. 2019a. Town of Port au Port West – Aguathuna – Felix Cove Development Regulations (2019-29), September 2019. Town of Port au Port West – Aguathuna – Felix Cove, NL.</p> <p>Town of Port au Port West – Aguathuna – Felix Cove. 2019b. Town of Port au Port West – Aguathuna – Felix Cove Municipal Plan (2019-29), September 2019. Town of Port au Port West – Aguathuna – Felix Cove, NL.</p> <p>Town of St. George’s. 2020a. Town of St. George’s Development Regulations, November 2020. Town of St. George’s, NL.</p> <p>Town of St. George’s. 2020b. Town of St. George’s Municipal Plan, November 2020. Town of St. George’s, NL.</p> <p>Town of Stephenville. 2014a. Town of Stephenville Development Regulations, June 2016. Town of Stephenville, NL.</p> <p>Town of Stephenville. 2014b. Town of Stephenville Municipal Plan, June 2016. Town of Stephenville, NL.</p>

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Comment ID:	DMPA 16
	Town of Stephenville Crossing. 2021a. Town of Stephenville Crossing Development Regulations, August 2021. Town of Stephenville Crossing, NL. Town of Stephenville Crossing. 2021b. Town of Stephenville Crossing Municipal Plan, August 2021. Town of Stephenville Crossing, NL.
Supporting Documentation	None

Response to DMPA 17

Comment ID:	DMPA 17
Department:	Municipal and Provincial Affairs
Branch/ Division:	
EIS Guidelines Reference (Where provided):	General
Reviewer’s Comment:	<ul style="list-style-type: none"> There should be a section on Appeals of Development Decisions under PART VI of the <i>Urban and Rural Planning Act, 2000</i>.
Response:	<p>Part VI of the <i>Urban and Rural Planning Act, 2000</i> details provisions with respect to Appeals of Development Decisions. The following provision is noted with respect to development regulation amendments:</p> <p>41(2) A decision by a council, regional authority, or authorized administrator to adopt, approve or proceed with a plan, a scheme, development regulations and amendments and revisions of them is final and is not subject to an appeal.</p> <p>Discretionary use application decisions can be appealed by a person or an association of aggrieved persons to an appropriate appeal board. An appeal is to be filed with the appropriate Appeal Board no more than 14 days after the person who made the original application being appealed has received the decision being appealed. The appeal is to be made in writing and is to include: a summary of the decision appealed from; the grounds for the appeal; and the required fee (per subsection 42(5) of the Act. Once notice is received of a registration of an appeal, development on a property must cease. Notice of the appeal hearing is to be provided not fewer than seven (7) days before the scheduled date for the hearing of the appeal. The Appeal Board convenes to hear evidence in accordance with section 43 of the Act and decide on the appeal. An Appeal Board may confirm, reverse, or vary the decision appealed from and impose conditions that the Appeal Board considers appropriate in the circumstances. It may direct Council to carry out its decision or make the necessary order to have its decision implemented. Where Council may, in its discretion, decide, an Appeal Board will not make another decision that overrules the discretionary decision. Where on appeal, a development permit is confirmed or ordered to be issued, Council will issue the development permit as confirmed or ordered by the Appeal Board.</p>
Supporting Documentation	None

Response to DMPA 18

Comment ID:	DMPA 18
Department:	Municipal and Provincial Affairs
Branch/ Division:	
EIS Guidelines Reference (Where provided):	General
Reviewer's Comment:	<ul style="list-style-type: none"> BSA-4 – Figure 4.2 Municipal Boundaries and Planning Areas in the RAA is deficient. It is not possible to clearly see Municipal Boundaries or Municipal Planning Areas / Protected Roads in the maps provided.
Response:	Please see response to DMPA 1.
Supporting Documentation	None

Response to DMPA 19

Comment ID:	DMPA 19
Department:	Municipal and Provincial Affairs
Branch/ Division:	
EIS Guidelines Reference (Where provided):	General
Reviewer's Comment:	<ul style="list-style-type: none"> General Comments under BSA-4 4.3.2.1 4.3.2.2 should be taken under advisement and considered for revision
Response:	WEGH2 has not received the detailed review comments to which DMPA is referring but would be pleased to review and discuss with DMPA if these comments have not been addressed in this EIS Amendment.
Supporting Documentation	None

10.0 NL Department of Tourism, Culture, Arts and Recreation

The Newfoundland and Labrador Department of Tourism, Culture, Arts and Recreation (TCAR) provided comments during review of the Project Environmental Impact Statement (EIS). The comments received from TCAR indicated that the EIS met the requirements of their relevant sections of the Final EIS Guidelines. Therefore, no additional / supplementary information was requested. Detailed comments and WEGH2's responses are provided below in Section 10.1.

10.1 Detailed Comments

Response to TCAR 1

Comment ID:	TCAR 1
Department:	Tourism, Culture, Arts and Recreation
Branch/ Division:	
EIS Guidelines Reference (Where provided):	PAO Comments 4.2.5 Heritage and Cultural Resources
Reviewer's Comment:	<p>Section 22 outlines the nature of historic resources and the undertaking of a desktop level Historic Resources Overview Assessment (HROA) that outlined the known and potential historic resources.</p> <p>The HROA adequately addressed known and potential historic resources and provided methods by which to address the possibility of the discovery of historic resources during construction activities.</p> <p>The EIS follows HROA recommendations and adequately provides the means to protect historic resources through avoidance and/or future mitigation through archaeological work.</p>
Response:	Thank you. No further response required.
Supporting Documentation	None

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Response to TCAR 2

Comment ID:	TCAR 2
Department:	Tourism, Culture, Arts and Recreation
Branch/ Division:	
EIS Guidelines Reference (Where provided):	Tourism Comments 4.2.4 Land and Resource Use
Reviewer's Comment:	Section 20 and BSA-4 address the requirements to describe tourism operators (including outfitters), trails, and unique sites and landscapes.
Response:	Thank you. No further response required.
Supporting Documentation	None

Response to TCAR 3

Comment ID:	TCAR 3
Department:	Tourism, Culture, Arts and Recreation
Branch/ Division:	
EIS Guidelines Reference (Where provided):	4.2.5 Heritage and Cultural Resources
Reviewer's Comment:	Section 22 and BSA-4 address the requirements to describe the natural attractions and tourism generating resources.
Response:	Thank you. No further response required.
Supporting Documentation	None

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Response to TCAR 4

Comment ID:	TCAR 4
Department:	Tourism, Culture, Arts and Recreation
Branch/ Division:	
EIS Guidelines Reference (Where provided):	4.2.7 Economy, Employment and Business
Reviewer's Comment:	Section 17 and BSA-4 address the requirements to describe and value the tourism industry and businesses in the study area. A summary of input received from outfitters on key issues and concerns is provided in Appendix 4-D of the EIS.
Response:	Thank you. No further response required.
Supporting Documentation	None

Response to TCAR 5

Comment ID:	TCAR 5
Department:	Tourism, Culture, Arts and Recreation
Branch/ Division:	
EIS Guidelines Reference (Where provided):	4.3.1 Atmospheric Environment
Reviewer's Comment:	Section 2 Figure 2.1 of BSA-1 visually depicts locations of noise and vibration monitoring equipment in the Project Area.
Response:	Thank you. No further response required.
Supporting Documentation	None

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Response to TCAR 6

Comment ID:	TCAR 6
Department:	Tourism, Culture, Arts and Recreation
Branch/ Division:	
EIS Guidelines Reference (Where provided):	6.2 Predicted Environmental Effects of the Undertaking
Reviewer's Comment:	Section 6.2.f.vii of the EIS Guidelines is missing from the Concordance Table. However, the effect on land use and tenure for Tourism establishments and operations is addressed in Chapter 20, Section 20.5.
Response:	Comment noted. Thank you. No further response required.
Supporting Documentation	None

Response to TCAR 7

Comment ID:	TCAR 7
Department:	Tourism, Culture, Arts and Recreation
Branch/ Division:	
EIS Guidelines Reference (Where provided):	6.4 a Cumulative Environmental Effects on outfitters, and trails (e.g. International Appalachian Trail NL and Outer Bay of Islands Enhancement Committee trails)
Reviewer's Comment:	Chapter 23, Section 23.4.1 addresses the requirements to identify and assess the Project's cumulative environmental effects including those on outfitters and trails.
Response:	Thank you. No further response required.
Supporting Documentation	None

Project Nujio'qonik : Amendment to the Environmental Impact Statement

Response to TCAR 8

Comment ID:	TCAR 8
Department:	Tourism, Culture, Arts and Recreation
Branch/ Division:	
EIS Guidelines Reference (Where provided):	7.2 Plans & 7.2.8.4 Outfitter Environmental Effects Monitoring Plan (OEEMP)
Reviewer's Comment:	As per the EIS, the Outfitter Environmental Effects Monitoring Plan is being submitted post-EIS submission.
Response:	Comment noted. Thank you.
Supporting Documentation	None

11.0 NL Department of Transportation and Infrastructure

The Newfoundland and Labrador Department of Transportation and Infrastructure (DTI) provided comments during review of the Project Environmental Impact Statement (EIS). Detailed comments and responses by World Energy GH2 (WEGH2) are provided below in Section 11.1.

11.1 Detailed Comments

Response to DTI 1

Comment ID:	DTI 1
Department:	Transportation and Infrastructure
Branch/ Division:	
EIS Guidelines Reference (Where provided):	7.2.4 Transportation Impact Study and Traffic Management Plan
Reviewer's Comment:	The EIS mentions using R460 in table 2.1 to access the Codroy development for the heavier loads, this was confirmed to be an error by the Proponent. However the Department wishes to reiterate that this section has a long standing load limit of 20 tons so this would not be allowed.
Response:	Acknowledged. Thank you
Supporting Documentation	None

Project Nujio'qonik : Amendment to the Environmental Impact Statement

Response to DTI 2

Comment ID:	DTI 2
Department:	Transportation and Infrastructure
Branch/ Division:	
EIS Guidelines Reference (Where provided):	7.2.4 Transportation Impact Study and Traffic Management Plan
Reviewer's Comment:	The EIS mentions that Main Gut Bridge (Route 490) will be used for all loads to Area 4. The bridge was designed for a HS20 design load, and currently is open to normal highway loads, excessive highway overweight loads are not permitted. Note that the Department has located the design drawings for this bridge and the proponent may use these to justify higher than normal highway loads if in accordance with the latest edition of Canadian Highway Bridge Design Code, and evaluated and submitted with stamped calculations by a Professional Engineer registered in the Province of Newfoundland and Labrador that is accepted by the Department. However the proponent should be aware that there is a strong likelihood that an evaluation may still show that the bridge cannot accommodate these loads and should look at alternative ways to cross this waterway.
Response:	<p>Comment acknowledged. WEGH2 has hired Harbourside Engineering Consultants to assess Main Gut Bridge and its capacity using different load configurations to transport the heaviest wind turbine components to the Codroy Wind Farm.</p> <p>Preliminary results conducted from a desktop study using drawings provided by the Province demonstrate a suitable trailer configuration (Figure DTI-2.1) for the heaviest load (105,000 kg) that does not show any overstresses that would prevent this transport configurations from being acceptable. Harbourside has checked the deck, girders and pier pile caps, and have not identified any issues. Harbourside has determined that the loads in the pier piles are slightly above the design loads, and therefore need to complete some additional checks on the capacity of these piles to confirm they are adequate. However, based on the results of the desktop study thus far, we anticipate positive results.</p> <p>Harbourside will still need to complete the checks on the abutments and the abutment piles; however, based on the girder and pier results, they are confident that the abutments will be acceptable, as well.</p> <p>It should be noted that although we are finding that the structure should be adequate for the transporter option, the results are tight and Harbourside must conduct a more refined analysis. In order to obtain satisfactory results, they will complete a more detailed analysis of the structure. A secondary / alternate route from Port aux Basques is therefore not required.</p>
Supporting Documentation	None

Project Nujio'qonik : Amendment to the Environmental Impact Statement

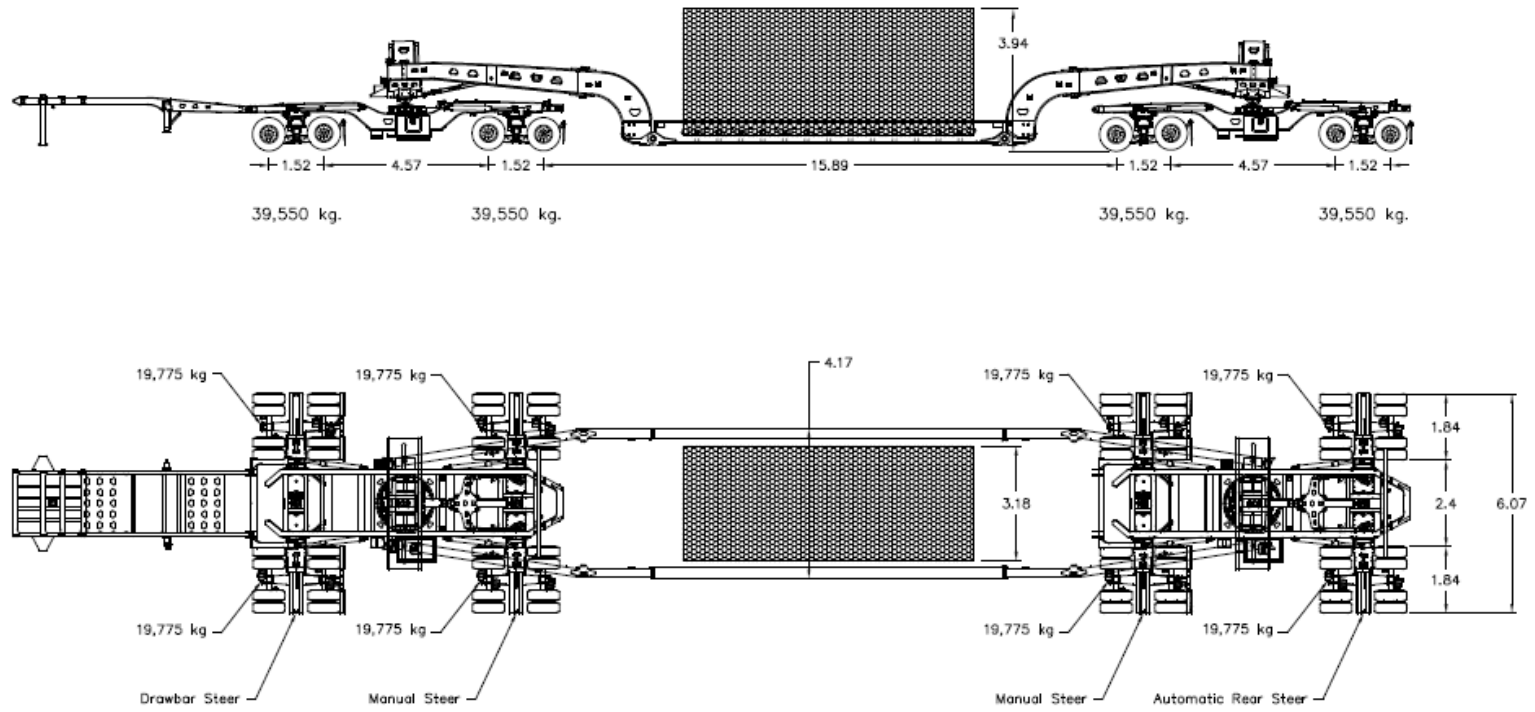


Figure DTI-2.1 Trailer Configuration for Heaviest Load (105,000 kg)

Project Nujio'qonik : Amendment to the Environmental Impact Statement

Response to DTI 3

Comment ID:	DTI 3
Department:	Transportation and Infrastructure
Branch/ Division:	
EIS Guidelines Reference (Where provided):	7.2.4 Transportation Impact Study and Traffic Management Plan
Reviewer's Comment:	All access points to Department roadways will need to be applied for individually and will require submission of applications.
Response:	Acknowledged. Thank you. This will be addressed during the permitting phase of the Project when final design is confirmed.
Supporting Documentation	None

Response to DTI 4

Comment ID:	DTI 4
Department:	Transportation and Infrastructure
Branch/ Division:	
EIS Guidelines Reference (Where provided):	7.2.4 Transportation Impact Study and Traffic Management Plan
Reviewer's Comment:	The EIS mentions heavy load permitting but doesn't mention the tire pressure limit in load considerations. This will need to be complied with for any heavy load movements.
Response:	Acknowledged. Thank you. This will be addressed during the permitting phase of the Project when final design is confirmed.
Supporting Documentation	None

Project Nujio'qonik : Amendment to the Environmental Impact Statement

Response to DTI 5

Comment ID:	DTI 5
Department:	Transportation and Infrastructure
Branch/ Division:	
EIS Guidelines Reference (Where provided):	7.2.4 Transportation Impact Study and Traffic Management Plan
Reviewer's Comment:	The EIS mentions the structures under 3m span so it's good that it is recognized and will be something that will need to appear in their TMP.
Response:	Acknowledged. Thank you. This will be addressed during the permitting phase of the Project when final design is confirmed.
Supporting Documentation	None

Response to DTI 6

Comment ID:	DTI 6
Department:	Transportation and Infrastructure
Branch/ Division:	
EIS Guidelines Reference (Where provided):	7.2.4 Transportation Impact Study and Traffic Management Plan
Reviewer's Comment:	Any modifications to Department infrastructure would have to be designed and submitted for review.
Response:	Acknowledged. Thank you. This will be addressed during the permitting phase of the Project when final design is confirmed.
Supporting Documentation	None

Project Nujio'qonik : Amendment to the Environmental Impact Statement

Response to DTI 7

Comment ID:	DTI 7
Department:	Transportation and Infrastructure
Branch/ Division:	
EIS Guidelines Reference (Where provided):	7.2.4 Transportation Impact Study and Traffic Management Plan
Reviewer's Comment:	<p>There will need to be a larger discussion on road closures especially any proposed long duration ones, Road closure requests will need to be presented and considered by the Department prior to being implemented.</p> <p>Whist the EIS does make mention of the ferry schedule, the Department may request they move off hours or overnight when some of these loads are moved due to the closures they will require.</p> <p>Advanced notice of road/intersection closures will be necessary for some of the turning movements.</p>
Response:	Acknowledged. Thank you. This will be addressed during the permitting phase of the Project when final design is confirmed.
Supporting Documentation	None

Response to DTI 8

Comment ID:	DTI 8
Department:	Transportation and Infrastructure
Branch/ Division:	
EIS Guidelines Reference (Where provided):	7.2.4 Transportation Impact Study and Traffic Management Plan
Reviewer's Comment:	The EIS mentions the need to remove signage to accommodate their moves. The Department cannot permit the removal of any signage be it regulatory, warning or wayfinding for any length of time. While the Department recognizes there are conflicts between the movements and signage, they will need to present a proposal on how they will mitigate this work.
Response:	Regulatory and warning signs will need to be temporarily relocated to a location acceptable to the Department of Transportation and Infrastructure (DTI). WEGH2 will further consult with DTI on this issue during the permitting phase of the Project when final design is confirmed.
Supporting Documentation	None

Project Nujio'qonik : Amendment to the Environmental Impact Statement

Response to DTI 9

Comment ID:	DTI 9
Department:	Transportation and Infrastructure
Branch/ Division:	
EIS Guidelines Reference (Where provided):	7.2.4 Transportation Impact Study and Traffic Management Plan
Reviewer's Comment:	Traffic plans will have to comply with the Traffic Manual
Response:	Acknowledged. Thank you.
Supporting Documentation	None

Response to DTI 10

Comment ID:	DTI 10
Department:	Transportation and Infrastructure
Branch/ Division:	
EIS Guidelines Reference (Where provided):	7.2.4 Transportation Impact Study and Traffic Management Plan
Reviewer's Comment:	Modifications to TI roadways to overcome off-tracking issues will need to be presented and approved by the Department. Proponent will need to confirm land ownerships as it is not always the case that the Department actually owns all land within the prescribed Right of Way of our roads.
Response:	Acknowledged. Thank you.
Supporting Documentation	None

Project Nujio'qonik : Amendment to the Environmental Impact Statement

Response to DTI 11

Comment ID:	DTI 11
Department:	Transportation and Infrastructure
Branch/ Division:	
EIS Guidelines Reference (Where provided):	7.2.4 Transportation Impact Study and Traffic Management Plan
Reviewer's Comment:	The Department will be undertaking a design modification of the TCH on approach to the R460 interchange by introducing a median separation between the East and West bound lanes to alleviate an issue with driver confusion when travelling west on approach to the interchange. No design has taken place as of yet but it is planned to mimic the lane separation currently implemented on the TCH near the Glovertown Interchange. The proponent will need to consider this in their traffic movements.
Response:	Acknowledged. Thank you. WEGH2 will further consult with Department of Transportation and Infrastructure on this issue during the permitting phase of the Project when final design is confirmed.
Supporting Documentation	None

Response to DTI 12

Comment ID:	DTI 12
Department:	Transportation and Infrastructure
Branch/ Division:	
EIS Guidelines Reference (Where provided):	7.2.4 Transportation Impact Study and Traffic Management Plan
Reviewer's Comment:	Any utility relocates required involving the Department's Right of Way will need to be submitted for review and approval by the responsible Utility.
Response:	Acknowledged. Thank you.
Supporting Documentation	None

12.0 Immigration, Population Growth and Skills

The Newfoundland and Labrador Department of Immigration, Population Growth and Skills (IPGS) provided comments during review of the Project Environmental Impact Statement (EIS). Detailed comments and responses from World Energy GH₂ (WEGH₂) are provided below in Section 12.1.

12.1 Detailed Comments

Response to IPGS 1

Comment ID:	IPGS 1
Department:	Immigration, Population Growth and Skills
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	7.2.6 Workforce and Employment Plan (part a to g)
Reviewer's Comment:	Suggest that NOC 2021 codes at the 5 digit level be used instead of NOC 2016 codes, as NOC 2021 codes are the most recent available. The proponent provided the required information in the EIS document and committed to required reporting.
Response:	Thank you. The most recent NOC codes will be used in future Workforce and Employment Plans.
Supporting Documentation:	None

Response to IPGS 2

Comment ID:	IPGS 2
Department:	Immigration, Population Growth and Skills
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	

Project Nujio'gonik: Amendment to the Environmental Impact Statement

Comment ID:	IPGS 2
Reviewer's Comment:	<p>On page 7 of Appendix 2-I of the EIS document, the proponent states that "World Energy GH2 commits to developing a Benefits Agreement that meets the approval of the Minister of Industry, Energy and Technology, and includes a DEIB (diversity, equity, inclusion and belonging) Plan that meets the requirements of the Minister responsible for Women and Gender Equality."</p> <ul style="list-style-type: none"> • IPGS notes more detail was provided in the registration document regarding a diversity, equity, inclusion and belonging plan, than in the EIS document. IPGS suggests including the target measures as well as adding details on how they will be met. • IPGS suggests being explicit in stating whether marginalized groups such as newcomers and minorities will be considered within the diversity hire.
Response:	<p>Section 7.2.6 of the Environmental Impact Statement (EIS) guidelines outline the requirement of a "commitment to develop a Benefits Agreement that meets the approval of the Minister of Industry, Energy and Technology, and includes a Gender Equity, Diversity and Inclusion Plan that meets the requirements of the Minister responsible for Women and Gender Equality." This commitment to develop a Benefits Agreement and a Gender Equity, Diversity and Inclusion Plan is outlined in the EIS submission. Equity, diversity and inclusion targets, and details regarding recruitment, will be included in the Equity, Diversity and Inclusion Plan which will be developed in consultation with the Minister responsible for Women and Gender Equality subsequent to EIS approval and prior to project construction.</p>
Supporting Documentation:	None

Response to IPGS 3

Comment ID:	IPGS 3
Department:	Immigration, Population Growth and Skills
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	
Reviewer's Comment:	<p>On page 6 of Appendix 2-I of the EIS document, the proponent references a partnership with the College of the North Atlantic on their Wind Technician Program and Hydrogen Technician Program and a partnership with Qalipu First Nation and DOB Academy in the Netherlands to develop training and curriculum. World Energy GH2 has committed to continued collaboration with government, education and training institutions.</p> <ul style="list-style-type: none"> • IPGS suggests consideration be given to re-skilling or up-skilling opportunities for individuals who may have transferrable skills, if not already considered. • IPGS would appreciate being informed of this work and offerings as they unfold.

Project Nujio'gonik: Amendment to the Environmental Impact Statement

Comment ID:	IPGS 3
Response:	WEGH2 will give consideration to re-skilling or up-skilling opportunities for individuals who may have transferrable skills in the development of the Project Benefits Agreement and the Gender Equity, Diversity and Inclusion Plan in consultation with IPGS.
Supporting Documentation:	None

Response to IPGS 4

Comment ID:	IPGS 4
Department:	Immigration, Population Growth and Skills
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	
Reviewer's Comment:	<p>On page 5 of Appendix 2-I of the EIS document, it is noted that World Energy GH2 will be using Venor, a recruitment and human resources consultancy firm to develop a 'labour relations' strategy.</p> <ul style="list-style-type: none"> IPGS suggests outlining if this will include the strategy for recruitment and hiring, as labour relations typically refers to relationship between the management of a company or organization and its workforce. This usually occurs after a workforce has been hired.
Response:	In this context, we referred to labour relations strategy as including a strategy for recruitment and hiring. We will also work closely with labour associations in the development of this strategy.
Supporting Documentation:	None

Response to IPGS 5

Comment ID:	IPGS 5
Department:	Immigration, Population Growth and Skills
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	

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Comment ID:	IPGS 5
Reviewer's Comment:	One of the mandates of IPGS is to engage with employers and community members in promoting awareness of multiculturalism and anti-racism. OIM suggests contacting the Association for New Canadians at 709-722-9680 or ict@ancnl.ca to ask them about Intercultural Competency Training, which can grow the proponent's knowledge and understanding about Diversity, Equity and Inclusion principles.
Response:	Thank you. WEGH2 will contact the ANC regarding Intercultural Competency Training
Supporting Documentation:	None

Response to IPGS 6

Comment ID:	IPGS 6
Department:	Immigration, Population Growth and Skills
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	
Reviewer's Comment:	IPGS delivers two provincial immigration programs, the Provincial Nominee Program and the Atlantic Immigration Program. Both programs can help employers recruit international workers for long-term employment in the province (i.e., at least one year in duration). OIM can assist international workers obtain a work permit, and help guide the proponent or, in this case, the winning bidder and the prospective worker through the immigration process. The proponent has indicated that they will seek to recruit several people for this project and provided a robust plan, but not specifically mentioned about seeking to recruit long-term international workers for this project. However, should the proponent wish to do so, they are encouraged to contact the IPGS at attraction@gov.nl.ca or immigration@gov.nl.ca.
Response:	WEGH2 will consider the Provincial Nominee Program and the Atlantic Immigration Programs in development of its labour relations strategy.
Supporting Documentation:	None

13.0 Digital Government Service

The Newfoundland and Labrador Department of Digital Government Service (DGS) provided comments during review of the Project Environmental Impact Statement (EIS). Detailed comments and responses from World Energy GH2 (WEGH2) are provided below in Section 13.1.

13.1 Detailed Comments

Response to DGS 1

Comment ID:	DGS 1
Department:	Digital Government and Service NL
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	7.2.1 Emergency Response/Contingency Plan
Reviewer's Comment:	A comprehensive emergency response plan is provided.
Response:	Thank you. No response required.
Supporting Documentation:	None

Response to DGS 2

Comment ID:	DGS 2
Department:	Digital Government and Service NL
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	7.2.2 Waste Management Plan
Reviewer's Comment:	A comprehensive waste management plan is provided.
Response:	Thank you. No response required.
Supporting Documentation:	None

Project Nujio'qonik: Amendment to the Environmental Impact Statement

Response to DGS 3

Comment ID:	DGS 3
Department:	Digital Government and Service NL
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	7.2.3 Hazardous Materials Response and Training Plan
Reviewer's Comment:	A comprehensive hazardous materials response plan is provided.
Response:	Thank you. No response required.
Supporting Documentation:	None

Response to DGS 4

Comment ID:	DGS 4
Department:	Digital Government and Service NL
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	2.3.5 Protected Roads
Reviewer's Comment:	Any required Protected Roads permits will be obtained.
Response:	Agreed. Any required Protected Roads permits will be obtained.
Supporting Documentation:	None

Project Nujio'qonik: Amendment to the Environmental Impact Statement

Response to DGS 5

Comment ID:	DGS5
Department:	Digital Government and Service NL
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	2.3.1 B) viii Liquid Fuel Storage
Reviewer's Comment:	Any required permits for fuel and associated products will be obtained.
Response:	Agreed. Any required fuel and associated products permits will be obtained.
Supporting Documentation:	None

Response to DGS 6

Comment ID:	DGS 6
Department:	Digital Government and Service NL
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	1.3.3 Other Environmental Regulatory and Permitting Requirements (Table 1.4)
Reviewer's Comment:	No reference in Table 1.4 to requirements for elevating devices subject to the <i>Public Safety Act</i> to be registered prior to installation and inspected/approved with a certificate issued prior to operation.
Response:	Table 1.4 of the EIS has been updated and included as Table MPA 5.1.
Supporting Documentation:	Table DMPA5.1 Updated Table 1.4 from the EIS

Project Nujio'qonik: Amendment to the Environmental Impact Statement

Response to DGS 7

Comment ID:	DGS 7
Department:	Digital Government and Service NL
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	1.3.3 Other Environmental Regulatory and Permitting Requirements (Table 1.4)
Reviewer's Comment:	No reference to requirement for permit prior to construction, extension, change to sewage systems subject to the <i>Water Resources Act</i> .
Response:	Table 1.4 of the EIS has been updated and included as Table MPA 5.1.
Supporting Documentation:	Table DMPA5.1 Updated Table 1.4 from the EIS

Response to DGS 8

Comment ID:	DGS 8
Department:	Digital Government and Service NL
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	1.3.3 Other Environmental Regulatory and Permitting Requirements (Table 1.4)
Reviewer's Comment:	The legislation related to the National Building Code –Fire, Life Safety and Building Safety approval is the <i>Fire Protection Services Act</i> .
Response:	Table 1.4 of the EIS has been updated and included as Table MPA 5.1.
Supporting Documentation:	Table DMPA5.1 Updated Table 1.4 from the EIS

Project Nujio'qonik: Amendment to the Environmental Impact Statement

Response to DGS 9

Comment ID:	DGS 9
Department:	Digital Government and Service NL
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	1.3.3 Other Environmental Regulatory and Permitting Requirements (Table 1.4)
Reviewer's Comment:	Pressure Plan Registration should be amended to read: Pressure Plant Registration".
Response:	Acknowledged. Thank you.
Supporting Documentation:	None

Response to DGS 10

Comment ID:	DGS 10
Department:	Digital Government and Service NL
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	2.11 Summary of Project Design Codes and Standards
Reviewer's Comment:	The Code/Standard listed as National Building Code –Fire, Life Safety and Building Safety. The applicable legislation is the <i>Fire Protection Services Act</i> and the Authority is Justice and Public Safety.
Response:	Table 1.4 of the EIS has been updated and included as Table MPA 5.1.
Supporting Documentation:	Table DMPA5.1 Updated Table 1.4 from the EIS

Project Nujio'qonik: Amendment to the Environmental Impact Statement

Response to DGS 11

Comment ID:	DGS 11
Department:	Digital Government and Service NL
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	2.11 Summary of Project Design Codes and Standards
Reviewer's Comment:	The Code/Standard listed as Buildings Accessibility Registration and Permit or Building Accessibility Exemption Registration and National Building Code of Canada Plans Review. The Code/Standard would be the Buildings Accessibility Act and Regulations.
Response:	Table 1.4 of the EIS has been updated and included as Table MPA 5.1.
Supporting Documentation:	Table DMPA5.1 Updated Table 1.4 from the EIS

Response to DGS 12

Comment ID:	DGS 12
Department:	Digital Government and Service NL
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	2.8.6 Sanitary Waste
Reviewer's Comment:	A description of plan to deal with sanitary waste is provided in the EIS but not in the concordance table.
Response:	Acknowledged. Thank you.
Supporting Documentation:	None

Project Nujjo'qonik: Amendment to the Environmental Impact Statement

Response to DSG 13

Comment ID:	DGS 13
Department:	Digital Government and Service NL
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	2.3.1 Temporary Workforce Accommodations & Associated Infrastructure Accommodations
Reviewer's Comment:	Any sewage disposal less than 4546 litres/day shall fall under the <i>Sanitation Regulations</i> under the <i>Health and Community Services Act</i> .
Response:	Acknowledged. Thank you.
Supporting Documentation:	None

Response to DGS 14

Comment ID:	DGS 14
Department:	Digital Government and Service NL
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	2.3.1. Temporary Workforce Accommodations & Associated Infrastructure Canteen
Reviewer's Comment:	Any food service shall have a food establishment license under the <i>Food Premise Act</i> .
Response:	Acknowledged. Thank you.
Supporting Documentation:	None

Project Nujio'qonik: Amendment to the Environmental Impact Statement

Response to DGS 15

Comment ID:	DGS 15
Department:	Digital Government and Service NL
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	2.3.1. Temporary Workforce Accommodations & Associated Infrastructure Recreational Facilities
Reviewer's Comment:	Any swimming pool, hot tub or water park shall obtain a license under the <i>Public Pools Regulations</i> .
Response:	Acknowledged. Thank you.
Supporting Documentation:	None

Response to DGS 16

Comment ID:	DGS 16
Department:	Digital Government and Service NL
Branch/ Division:	-
EIS Guidelines Reference (Where provided):	2.3.5 Regulatory Framework and Government
Reviewer's Comment:	Document states electrical permits will be acquired as needed.
Response:	Acknowledged. Thank you.
Supporting Documentation:	None

14.0 Environment and Climate Change Canada

Environment and Climate Change Canada (ECCC) has provided comments based on their review of the Environmental Impact Statement (EIS) for the Project. Detailed comments along with responses from World Energy GH2 (WEGH2) are provided in Section 14.1.

14.1 Detailed Comments

Response to ECCC 1

Comment ID:	ECCC 1
Department:	Environment and Climate Change Canada
Branch/ Division:	
EIS Guidelines Reference (Where provided):	ECCC-01 4.3 Baseline Studies, and 4.3.3 Terrestrial Environment a. Avifauna, Species at Risk and Relevant Habitat
Reviewer’s Comment:	(a) ECCC notes that given that the project is registered under Newfoundland and Labrador’s <i>Environmental Protection Act</i> and <i>Environmental Assessment Regulations (2003)</i> , it remains the discretion of the Province of NL whether sufficient information has been provided to assess the Project under their jurisdiction and responsibility. (b) ECCC notes that many of the recommended baseline surveys and studies have not been undertaken for the Project to inform and support EIS conclusions. (c) ECCC guidance “Wind Turbines and Birds: A Guidance Document for Environmental Assessment” (Environment Canada 2007a), “Recommended Protocols for Monitoring Impacts of Wind Turbines on Birds” (Environment Canada 2007b) and Environment and Climate Change Canada’s Canadian Wildlife Service (Atlantic Region) – Wind Energy and Birds Environmental Assessment Guidance Update (2022) have been provided to the Province (via ECCC-EPOD) and the Proponent on several occasions, and CWS has provided advice related to specific baseline surveys / studies questions upon request.
Response:	(a) Thank you. Noted. (b) Based upon both the EIS Guidelines and regulatory consultation and feedback as described in Section 2.2 of this Environmental Impact Statement (EIS) Amendment, desktop baseline data is considered sufficient for the purposes of the environmental assessment.. As indicated in the EIS, WEGH2 is committed to and is in the process of conducting the site-specific environmental field programs identified in the EIS Guidelines and further defined through consultation with regulators prior to Project construction. Preliminary results of the 2023 Port au Port bird surveys are provided in the 2023 Interim Bird and Bat Data Report (Appendix 2-B). Given the phased approach to construction, baseline data collection to date has focused on the Port au Port Peninsula, since it will be the first wind farm to be

Comment ID:	ECCC 1
	<p>constructed. Baseline field data collection is planned in the Codroy area during 2024, along with continued baseline data collection on the Port au Port Peninsula. Reports detailing data collection methods, results and additional mitigation measures will be provided to regulators prior to Project construction, either as a standalone submission or as part of developing the required mitigation and monitoring plans (e.g., Avifauna Impacts Mitigation and Monitoring Plan (IMMP)). WEGH2 will engage Newfoundland and Labrador Department of Fisheries, Forestry and Agriculture (NLDDFA-Wildlife Division) and Environment and Climate Change Canada – Canadian Wildlife Service (ECCC-CWS) in the development of the required Species at Risk Impacts Mitigation and Monitoring Plans (SAR IMMPs).</p> <p>(c) Thank you. Guidelines, protocols, and advice received from ECCC-CWS via email were reviewed and incorporated into 2023 baseline surveys where possible. Guidelines were also used to guide development of a draft bird (and bat) radar study prepared by LGL Limited. This bird radar study plan will be incorporated into the Avifauna IMMP as specifically required in Section 7.2.8.3 of the Environmental Impact Statement (EIS) Guidelines. The IMMP will be prepared prior to Project construction as required in Section 7.2.8.4 of the EIS Guidelines.</p> <p>Surveys completed in 2023 included:</p> <ul style="list-style-type: none"> • Aerial Surveys for wintering waterbirds • Aerial Survey for Harlequin Duck and Purple Sandpiper • Land based Coastal Waterbird Survey • Wintering/Resident Landbird Survey • Spring and Fall Shorebird Survey • Spring and Fall Migration/Flight Path Survey • Fall Waterfowl Surveys • Nocturnal Owl Breeding Survey • Short-eared Owl Breeding Survey • Breeding Marshbird Monitoring Survey • Breeding Gull/Tern Survey • Inland Breeding Waterfowl Survey • Bank Swallow Breeding Survey • Seabird Colony Survey • Breeding Bird Survey Point Counts • Deployment of Autonomous Recording Units (ARUs) <p>The following guidance documents were consulted when developing the avifauna baseline surveys:</p> <ul style="list-style-type: none"> • Environment Canada 2007. Wind Turbines and Birds: A Guidance Document for Environmental Assessment. • Environment Canada 2007. Recommended Protocols for Monitoring Impacts of Wind Turbines on Birds. • Environment and Climate Change Canadian Wildlife Service (Atlantic Region). 2022. Wind Energy and Birds Environmental Assessment Guidance Update.
Supporting Documentation	Appendix 2-B 2023 Interim Bird and Bat Technical Data Report

Response to ECCC 2

Comment ID:	ECCC 2
Department:	Environment and Climate Change Canada
Branch/ Division:	
EIS Guidelines Reference (Where provided):	ECCC-02 7.2.8.3 Avifauna Impacts Mitigation and Monitoring Plan (Adaptive Management Framework) and 7.2.8.1 Species at Risk Impact Mitigation and Monitoring Plan
Reviewer’s Comment:	<p>(a) It is stated that many of the Monitoring and Adaptive Management Plans related to Avifauna and Species at Risk are not available as part of the EIS review and will only be submitted “prior to construction”. ECCC recommends including monitoring plan(s), mitigation plan(s) and adaptive management framework(s) as part of the EIS to support the EIS conclusions.</p> <p>(b) It should be understood that ECCC does not have any permits (or authorizations) or approvals in relation to the proposed project. Any advice that is provided by ECCC is intended to support the NLECC’s EA process to determine if potential residual effects are likely, and identify measures to minimize/lessen and monitor those effects to ensure compliance with the MBCA and SARA.</p>
Response:	<p>(a) Submitting the Impact, Mitigation and Monitoring Plan (IMMP) prior to construction is in line with requirements outlined in the Environmental Impact Statement (EIS) Guidelines (Section 7.2.8.4) WEGH2 is committed to developing site-specific mitigation and monitoring plans, including the Species at Risk IMMP and Avifauna IMMP prior to Project construction at that site. The plans will incorporate mitigation measures and monitoring commitments in the EIS and this EIS Amendment, will reflect applicable conditions of release from the environmental assessment process, and will include information on how and when updates to the plans will be made. The plans will be developed in consultation with applicable regulators and will be submitted for review prior to Project construction at that site. WEGH2 is committed to an adaptive management approach, and as such, these plans are considered “living” documents that will be updated as applicable to capture Project design updates and results of ongoing environmental monitoring.</p> <p>(b) Understood.</p>
Supporting Documentation	None

Response to ECCC 3

Comment ID:	ECCC 3
Department:	Environment and Climate Change Canada
Branch/ Division:	
EIS Guidelines Reference (Where provided):	ECCC-03 2.3 Project Description and Section 7.2 “Plans” related to Avifauna Mitigation and Section 7.2.8.1 Species at Risk Impacts Mitigation and Monitoring Plans
Reviewer’s Comment:	<p>2.0 Project Description, section 2.1 “Project Location and Associated Study Areas” (p. 25 of pdf), it is stated that: “These buffers allow flexibility for the micro-siting of Project components during detailed design, based on technical considerations as well as the avoidance of environmentally sensitive areas, where practicable”.</p> <p>ECCC notes that there is no reference in the EIS of their decision tree on what is “practicable”. There are many places in the EIS where the Proponent uses hedging statements of this type, with no reference on what factors will be considered or how they will be weighted in decision-making.</p> <p>ECCC recommends identifying environmental considerations into a decision tree when it is not “practicable” to implement mitigation measures and identifying alternative plan(s) and mitigation measure(s) to avoid/minimize effects.</p>
Response:	The Project layout has been designed to maintain buffers around known sensitive habitats, species, and historic resources. The possibility remains that additional sensitive habitats or species may be discovered during construction. Once identified, WEGH2 will then consider the options for mitigation of effects, including avoidance. WEGH2 will then consult regulatory authorities on how best to mitigate effects if they cannot be completely avoided by micro-siting the infrastructure.
Supporting Documentation:	None

Response to ECCC 4

Comment ID:	ECCC 4
Department:	Environment and Climate Change Canada
Branch/ Division:	
EIS Guidelines Reference (Where provided):	ECCC-04 4.3 Terrestrial Environment 4.3.3 Avifauna Baseline Studies
Reviewer’s Comment:	<p>13.0 Avifauna, section 13.2.2 – Landbirds (General Comment)</p> <p>(a) ECCC notes that our comments on Avifauna have been abbreviated to meet the requested deadline and our comments are not based on a complete review of all of the documentation available.</p> <p>(b) Due to the scale of this project, ECCC is of the view that there are important implications on landbird species that breed and migrate through the proposed Project area.</p> <p>(c) Western Newfoundland is part of the Atlantic Flyway, ECCC notes that landbirds will move through this area en masse and use the areas such as the Port au Port Peninsula, and the Codroy Valley / Port-aux-Basques area as staging sites and departure locations to mainland areas during migration. ECCC would like to highlight a gap in the information regarding the extent of that movement due to a lack of detail in the EIS.</p> <p>(d) ECCC recommends comprehensive migration monitoring using radar and diurnal surveys to thoroughly assess movement and staging on landbirds in the Project Areas.</p>
Response:	<p>(a) Thank you. Understood.</p> <p>(b) WEGH2 recognizes that the Project Area, Local Assessment Area and Regional Assessment Area are important to breeding, migrating and wintering landbirds.</p> <p>(c) WEGH2 recognizes that the Project is situated within the Atlantic Flyway and that there are many important staging areas present. Baseline surveys, which included migration monitoring and flight path surveys were completed in 2023 within the Port au Port peninsula and are planned for 2024 in the Codroy Area. Preliminary results of the 2023 Port au Port bird surveys are provided in the 2023 Interim Bird and Bat Technical Data Report (Appendix 2-B of this EIS Amendment). WEGH2 is committed to completing the analysis and reporting on Project-specific data that were collected in 2023, and continuing with data collection in 2024 and beyond as part of a mitigation and monitoring plan. These site-specific report/data will be provided to regulators prior to Project construction at sites, either as a standalone submission or as part of developing the required mitigation and monitoring plans.</p> <p>(d) A draft bird (and bat) radar study plan has been prepared which considered contents of the ECCC guidance documents (“Wind Turbines and Birds: A Guidance Document for Environmental Assessment” (EC 2007a), “Recommended Protocols for Monitoring Impacts of Wind Turbines on Birds” (EC 2007b) and ECCC-CWS (Atlantic Region) – Wind Energy and Birds Environmental Assessment Guidance Update (2022)). This bird/bat radar study plan will be incorporated into the Avifauna Impacts Mitigation and Monitoring Plan (IMMP) as specifically required in Section 7.2.8.3 of the EIS Guidelines.</p>

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	<p>Furthermore, WEGH2 is committed to collaborating with ECCC-CWS during development of the Avifauna IMMP.</p> <p>Diurnal surveys of migrating landbirds, shorebirds and waterfowl were completed in spring and fall 2023 in the Port au Port area . For 2024, a second season of migration surveys is planned for the Port au Port peninsula and a first year of surveys is planned for the Codroy Area.</p> <p>References:</p> <p>Environment Canada 2007a. Wind Turbines and Birds: A Guidance Document for Environmental Assessment.</p> <p>Environment Canada 2007b. Recommended Protocols for Monitoring Impacts of Wind Turbines on Birds.</p> <p>Environment and Climate Change Canada - Canadian Wildlife Service (Atlantic Region). 2022. Wind Energy and Birds Environmental Assessment Guidance Update.</p>
Supporting Documentation	Appendix 2-B 2023 Interim Bird and Bat Technical Data Report

Response to ECCC 5

Comment ID:	ECCC 5
Department:	Environment and Climate Change Canada
Branch/ Division:	
EIS Guidelines Reference (Where provided):	<p>ECCC-05</p> <p>4.3 Terrestrial Environment</p> <p>4.3.3 Avifauna Baseline Studies</p>
Reviewer’s Comment:	<p>(a) 13.0 Avifauna, section 13.2.1.2 “Field Surveys” (p. 7 of pdf), it is stated: “At the time of writing this assessment, the only field surveys that have been completed are winter coastal waterbird surveys”. The assumption is that many more baseline survey efforts are coming which will inform the EIS and conclusions related to significance. ECCC recommends that the EIS clarify whether there will be an opportunity to comment on survey design before these surveys are implemented which will be relevant to migration monitoring and effects monitoring.</p> <p>(b) The proposed Project is larger than any previous proposed projects in Atlantic Canada (possibly Canada). Considering information gaps for this site, ECCC is of the view that there is a lack of baseline information needed to make an informed assessment of impacts and support EA predictions and conclusions.</p> <p>(c) ECCC considers the proposed Project to have a “very high site sensitivity” (see Table 1 and section 8.2 factors of concern, ECCC, 2007 Wind Turbine and Birds A Guidance Document for Environmental Assessment, and ECCC-ATL, 2022 Guidance Update) (attached) and strongly recommends that a radar assessment be completed for both wind farm sites (ECCC 2007 (a)(b), ECCC-ATL 2022). Considering the scale of the Project, ECCC recommends the Proponent undertake a control/impact study approach.</p> <p>(d) ECCC recommends the use of paired additive and interactive Generalized Additive Models to assess the cumulative impacts on birds. Breeding bird</p>

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	<p>monitoring surveys should be designed in a way that is consistent with the design required to complete paired additive and interactive Generalized Additive Models to provide insight into whether interactive effects are occurring as a result of the multiple project developments in this part of the Province. This project, combined with other developments, may confound our understanding of how project impacts are affecting breeding birds in the area. Paired additive and interactive Generalized Additive Models will provide more clarity on whether interactive effects are occurring as a result of these multiple projects. This general area of the Province has seen impacts in recent years from other projects such as the Maritime Link, ongoing forestry, mining, linear feature development, etc. The cumulative effects assessment of all these types of developments and how it impacts birds is a challenging subject. It is unclear whether cumulative effects can be properly assessed without applying appropriate data models. This modelling exercise may also benefit from the data collected for other project developments in the area, and we encourage the inclusion of these legacy datasets into the modeling exercise where possible and appropriate.</p> <p>ECCC recommends that surveys be designed in a manner that data can be used to better model and understand impacts on more than just an additive approach. An example of this approach is provided with this publication: Mahon, C. L., G. L. Holloway, E. M. Bayne, and J. D. Toms. 2019. Additive and interactive cumulative effects on boreal landbirds: winners and losers in a multi-stressor landscape. <i>Ecological Applications</i> 29(5):e01895. 10.1002/eap.1895</p>
Response:	<p>(a) and (b) Stantec / WEGH2 requested to meet with Environment and Climate Change Canada - Canadian Wildlife Service (ECCC-CWS) in early 2023, but a meeting was not successful. Guidance received from ECCC-CWS by email was reviewed and incorporated to the survey design where possible.</p> <p>Based upon both the EIS Guidelines and regulatory consultation and feedback as described in Section 2.2 of this Environmental Impact Statement (EIS) Amendment, desktop baseline data is considered sufficient for the purposes of the environmental assessment. As indicated in the EIS, WEGH2 is committed to and is in the process of conducting the site-specific environmental field programs identified in the EIS Guidelines and further defined through consultation with regulators prior to Project construction. Preliminary results of the 2023 Port au Port bird surveys are provided in the 2023 Interim Bird and Bat Technical Data Report (Appendix 2-B of this EIS Amendment).</p> <p>Given the phased approach to construction, baseline data collection to date has focused on the Port au Port Peninsula, since it will be the first wind farm to be constructed. Baseline field data collection is planned in the Codroy area during 2024, along with continued baseline data collection on the Port au Port Peninsula. Reports detailing data collection methods, results and additional mitigation measures will be provided to regulators prior to Project construction, either as a standalone submission or as part of developing the required mitigation and monitoring plans (e.g., Avifauna Impacts Mitigation and Monitoring Plan). WEGH2 will engage Newfoundland and Labrador Department of Fisheries, Forestry and Agriculture (NLDDFA-Wildlife Division) and ECCC in the development of the required Species at Risk Impacts Mitigation and Monitoring Plans.</p> <p>Surveys completed in 2023 included:</p> <ul style="list-style-type: none"> • Aerial Surveys for wintering waterbirds • Aerial Surveys for Harlequin Duck and Purple Sandpiper

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	<ul style="list-style-type: none"> • Land based Coastal Waterbird Survey • Wintering/Resident • Landbird Survey • Spring and Fall Shorebird Survey • Spring and Fall Migration/Flight Path Survey • Fall Waterfowl Surveys • Nocturnal Owl Breeding Survey • Short-eared Owl Breeding Survey • Breeding Marshbird Monitoring Survey • Breeding Gull/Tern Survey • Inland Breeding Waterfowl Survey • Bank Swallow Breeding Survey • Seabird Colony Survey • Breeding Bird Survey Point Counts • Deployment of Autonomous Recording Units (ARUs) <p>(c) WEGH2 agrees with ECCC categorization of the Project as “very high site sensitivity” according to the noted ECCC guidance documents. The draft radar study plan includes consideration of the Before-After-Control-Impact (BACI) design; however, it is uncertain at this stage whether a BACI design will be feasible given uncertainties around an appropriate “control” or reference site. We are using a biostatistician to assist with study design and WEGH2 is committed to collaborating with ECCC-CWS on radar study design to comply with the <i>Migratory Bird Convention Act</i> and the <i>Species at Risk Act</i>. Radar studies are planned for 2024. 2023 baseline surveys (listed above) used a BACI design where feasible.</p> <p>(d) WEGHs agrees that categorizing the cumulative effects accurately is an essential component of the Project but feel that although Generalized Additive Models (GAMs) are a useful statistical tool to assess additive effects, it is beyond the scope of the EIS. Further, there is insufficient data available to inform GAMs. We have completed a suite of surveys (see response to sub-comments a / b), which were designed to categorize the movements and habitat use of a wide taxonomic range of birds in the area. We feel that this information is adequate to inform the basis of an IMMP. WEGH2 is committed to an adaptive approach to mitigation and monitoring, and data from surveys will continue to influence the IMMP and other applicable plans.</p>
Supporting Documentation	None

Response to ECCC 6

Comment ID:	ECCC 6
Department:	Environment and Climate Change Canada
Branch/ Division:	
EIS Guidelines Reference (Where provided):	ECCC-06 4.3 Terrestrial Environment 4.3.3 Avifauna 7.0 Environmental Protection – Mitigation and Plans And 7.2.1 Emergency Response / Contingency Plan (j)
Reviewer’s Comment:	<p>(a) 13.0 Avifauna, section 13.5.3.2 “Summary of Predicted Environmental Effects” (p. 84 of pdf), it is stated that “An increased risk to avifauna mortality is expected during the operations phase primarily through collisions with turbines and transmission lines”. ECCC notes that this stand-alone sentence addressing collision risk is not sufficient to address the potential scale of this issue. This minimization of impacts during other sensitive periods (i.e., migration) is further exacerbated by the sentence later in this same section stating “The risk of mortality is restricted to the LAA, and may occur during high sensitivity periods (e.g., breeding season)”.</p> <p>(b) ECCC anticipates that the proposed turbine locations on the Port au Port Peninsula will create a large barrier to landbirds that may try to traverse the Peninsula during migration (see Figure below). This is likely unique from other wind farms in the Atlantic Region, and supports the need for a more comprehensive assessment of the potential impacts, including a control/impact study approach to inform collision risks.</p>
Response:	<p>(a) The statement referenced is a summary of avifauna mortality risk, which was discussed in Section 13.5.2 of the Environmental Impact Statement (EIS). WEGH2 agrees that this standalone statement does not fully address the scale of the potential risk and is not intended as such. The risk of avifauna mortality is discussed for each Project phase by taxonomic group in Section 13.5.2 of the EIS. Within the subsections for each taxonomic group, the risk of mortality during spring and fall migration, breeding season and winter are assessed.</p> <p>Similarly, the statement: “The risk of mortality is restricted to the LAA, and may occur during high sensitivity periods (e.g., breeding season)” is not intended to imply that effects may only occur during the breeding season, but rather that the breeding season is a sensitive period. We agree that the migration period is also a sensitive period for certain species groups (e.g., shorebirds). Within Section 13.5.2 of the EIS, impacts during breeding, wintering, and migration are discussed.</p> <p>(b) Surveys completed in 2023, including migration and flight path surveys, will provide additional information on movements of birds within the Local Assessment Area to inform the IMMP. Radar studies are also planned for 2024 to collect additional data on bird movements.</p>
Supporting Documentation	None

Response to ECCC 7

Comment ID:	ECCC7
Department:	Environment and Climate Change Canada
Branch/ Division:	
EIS Guidelines Reference (Where provided):	ECCC-07 Avifauna 4.3 Baseline Studies 4.3.3 Terrestrial Environment (a) And 7.0 Environmental Protection – Mitigation and Plans, section 7.2 Plans
Reviewer’s Comment:	13.0 Avifauna, section 13.8 “Follow-up and Monitoring” (p.86 of pdf) ECCC notes that there are no references to recommended radar assessment monitoring for birds as recommended on several occasion during the various stages of the EIS development and correspondences (ECCC 2007 (a) (b), and ECCC-ATL guidance update 2022). ECCC recommends a control / impact study with the use of radar to assess treatments sites, as well as control sites for landbird use.
Response:	WEGH2 has reviewed the Environment and Climate Change Canada – Canadian Wildlife Service (ECCC-CWS) guidance documents and the documents were used during development of a draft bird (and bat) radar study. This bird radar study plan will be incorporated into the Avifauna Impacts Mitigation and Monitoring Plan (IMMP) as specifically required in Section 7.2.8.3 of the Environmental Impact Statement (EIS) Guidelines. The Avifauna IMMP will be prepared prior to Project construction as required in Section 7.2.8.4 of the EIS Guidelines. The draft radar study plan includes consideration of the Before-After-Control-Impact (BACI) design; however, it is uncertain at this stage whether a BACI design will be feasible given uncertainties around an appropriate “control” or reference site. We are utilizing a biostatistician to assist with study design and WEGH2 is committed to collaborating with ECCC-CWS on radar study design to ensure compliance with the <i>Migratory Birds Convention Act</i> (MBCA) and the <i>Species at Risk Act</i> (SARA). WEGH2 are planning consultation with ECCC-CWS on the IMMP and plan to have radar monitoring installed on the Port au Port in spring 2024.
Supporting Documentation:	None

Response to ECCC 8

Comment ID:	ECCC 8
Department:	Environment and Climate Change Canada
Branch/ Division:	
EIS Guidelines Reference (Where provided):	ECCC-08 6.2 Predicted Environmental Effects of the Undertaking (i)
Reviewer's Comment:	13.0 Avifauna, section 13.5.3.1 Residual Environmental Effects Characterization, Table 13.16 "Summary of Predicted Environmental Effects of the Undertaking on Avifauna" (p. 83 of pdf). ECCC notes that the Proponent's predictions re: the Magnitude of Residual Effects Characterization on the "Change in Mortality" to birds is predicted to be "low". ECCC is of the view that this statement is unsupported based on the limited information.
Response:	The effects of the project on changes in avifauna mortality were predicted to be low, which is defined as: <i>" ... observed mortality to migratory birds or bird nests, but at levels not anticipated to have a measurable effect on breeding density or diversity of local species populations".</i> The confidence in this prediction is considered moderate because the prediction was not made based on site-specific data, but rather based on a literature review of mortality of birds from collisions with wind turbines and transmission lines. Most published studies have shown low avifauna mortality at wind farms. For example, the 2018 Report from the Wind Energy Bird and Bat Monitoring Database found that non-raptor bird mortality estimates from May 1 to October 31 were: 1.0 ± 0.5 birds/turbine in Atlantic Canada, and 4.9 ± 0.06 birds/turbine in Ontario (BSC et al. 2018). References BSC, Canadian Wind Energy Association, Environment and Climate Change Canada and Ontario Ministry of Natural Resources and Forestry. 2018. Wind Energy Bird and Bat Monitoring Database Summary of the Findings from Post-construction Monitoring Reports.
Supporting Documentation	None

Response to ECCC 9

Comment ID:	ECCC 9
Department:	Environment and Climate Change Canada
Branch/ Division:	
EIS Guidelines Reference (Where provided):	ECCC-09 Avifauna 4.3 Baseline Studies 4.3.3 Terrestrial Environment (a)
Reviewer’s Comment:	13.0 Avifauna, Section 13.2.1.1 “Background Review” (p. 6 of pdf) ECCC notes that readily available data from the Breeding Bird Survey (BBS) were not included as part of background data sources. Data has been collected via BBS for many years at multiple sites in and near the Project Area and Regional Assessment Area (See screenshot below highlighting some BBS routes in the area).
Response:	Multiple background datasets were reviewed during preparation of Avifauna Baseline Report (Appendix BSA-3 of the Environmental Impact Statement (EIS)) and the EIS, including but not limited to eBird, Newfoundland and Labrador Breeding Bird Atlas and data from the Atlantic Canada Conservation Data Centre (AC CDC). Bird data from the AC CDC included Breeding Bird Survey (BBS) data, and although not summarized separately, were reviewed for occurrences of Species at Risk, Species of Conservation Concern and regionally rare species. These background datasets also informed the selection of survey locations for the 2023 field work, the results of which are appended to this document (Appendix 2-B) with a commitment for on-going studies.
Supporting Documentation	Appendix 2-B 2023 Bird and Bat Interim Technical Data Report

Response to ECCC 10

Comment ID:	ECCC 10
Department:	Environment and Climate Change Canada
Branch/ Division:	
EIS Guidelines Reference (Where provided):	ECCC-10 2.1 Study Area c) iv. Habitats of federally or provincially listed species at risk, including critical habitat for the designated species and other sensitive areas. And 4.0 Environment 4.1 Key Issues And 4.2.3 Terrestrial Environment c) And 4.3 Baseline Studies
Reviewer’s Comment:	13.0 Avifauna, Table 13.1 “Species at Risk that may be Present Within the Local Assessment Area and Regional Assessment Area” (p. 13 of pdf), Bank Swallow - ECCC advises that the habitat assessment should note that Bank Swallow (listed as Threatened on Schedule 1 of SARA) may also construct nests in human-made habitats, like quarries, aggregate pits and sand piles which are not considered critical habitat, but should still be identified as part of the assessment of potential effects. a) ECCC recommends updating the Habitat Description for Bank Swallow (and (b) the Proponent should identify potential anthropogenic habitats in the LAA where Bank Swallow may be nesting in the LAA and potentially interacting with the project.
Response:	(a) Please consider the following text to have replaced the habitat description for Bank Swallow in Table 13.1 of the Environmental Impact Statement (EIS): An aerial insectivore that constructs nests in vertical banks, typically along watercourses and in coastal areas. Forages in open habitats including open water, wetlands, grasslands, agricultural areas, shrublands, and occasionally over wooded areas (SSAC 2009a). Bank Swallows will also nest in human-made habitats including but not limited to sand and gravel pits, road cuts, and sand piles (ECCC 2022). A common breeder within areas of suitable habitat throughout the Project Area. Colonies found on Port au Port Peninsula, Stephenville, Stephenville Crossing, throughout the Flat Bay and Jeffrey’s regions, and in coastal areas adjacent to the proposed wind farms (eBird 2022). Bank Swallow may also be present in human-made habitats where vertical or near vertical cliff faces are present. (b) Surveys completed in 2023 looked for Bank Swallow colonies in both natural and human-made habitats within the Local Assessment Area. Results will be summarized in the 2023 Interim Bird and Bat Technical Data Report (Appendix 2-B of this EIS Amendment). References: eBird. 2022. eBird: An online database of bird distribution and abundance [web application]. eBird, Cornell Lab of Ornithology, Ithaca, New York. Online: http://www.ebird.org

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Comment ID:	ECCC 10
	ECCC (Environment and Climate Change Canada). 2022. Recovery Strategy for the Bank Swallow (<i>Riparia riparia</i>) in Canada. Species at Risk Act Recovery Strategy Series. Environment and Climate Change Canada, Ottawa. ix + 125 pp.
Supporting Documentation	Appendix 2-B 2023 Interim Bird and Bat Technical Data Report

Response to ECCC 11

Comment ID:	ECCC 11
Department:	Environment and Climate Change Canada
Branch/ Division:	
EIS Guidelines Reference (Where provided):	ECCC-11 2.1 Study Area c) iv. Habitats of federally or provincially listed specie at risk, including critical habitat for the designated species and other sensitive areas. And 4.0 Environment 4.1 Key Issues And 4.2.3 Terrestrial Environment c) And 4.3 Baseline Studies
Reviewer’s Comment:	13.0 Avifauna Table 13.1 “Species at Risk that may be Present Within the Local Assessment Area and Regional Assessment Area” (p.14 of pdf), ECCC notes that Bobolink (listed as Threatened on Schedule 1 of SARA) are also present during the Summer (breeding), there have been confirmed breeding sightings of Bobolink in the past, however the check-mark is missing from Table 13.1. ECCC recommends updating this table to include the Presence of Bobolink (SARA listed Threatened) during the breeding season in LAA and RAA.
Response:	WEGH2 acknowledges that Bobolink are present during the breeding season in the Local Assessment Area and Regional Assessment Area. The check-mark was inadvertently missed from Table 13.1 of the Environmental Impact Statement.
Supporting Documentation	None

Response to ECCC 12

Comment ID:	ECCC 12
Department:	Environment and Climate Change Canada
Branch/ Division:	
EIS Guidelines Reference (Where provided):	ECCC-12 2.1 Study Area c) iv. Habitats of federally or provincially listed species at risk, including critical habitat for the designated species and other sensitive areas. And 4.0 Environment 4.1 Key Issues And 4.2.3 Terrestrial Environment c) And 4.3 Baseline Studies
Reviewer’s Comment:	13.0 Avifauna, Table 13.2 “Species of Conservation Concern that may be Present within the Project Area and / or LAA (p. 24 of pdf) ECCC notes in Atlantic Canada, Northern Parula breeds in mature forest (coniferous, mixed, and sometimes deciduous) where beard moss is present. ECCC recommends updating the Habitat Description for this species.
Response:	WEGH2 acknowledges that Northern Parula may breed in mature forests where beard moss is present.
Supporting Documentation	None

Response to ECCC 13

Comment ID:	ECCC 13
Department:	Environment and Climate Change Canada
Branch/ Division:	
EIS Guidelines Reference (Where provided):	ECCC-13 6.2. Predicted Environmental Effects of the Undertaking
Reviewer’s Comment:	13.0 Avifauna, Table 13.5 “Characterization of Predicted Environmental Effects of the Undertaking on Avifauna - Magnitude” (page 31 of pdf), ECCC notes that this table uses ‘changes in breeding habitat’ as a quantitative measure to assess the magnitude of predicted environmental effects. For many of the bird species at risk (SAR) (and non-SAR) that use this area, the site habitat is at least as important during wintering and migration periods, and not just breeding. ECCC recommends that any potential impacts affecting the ability of species to use these habitats during other times of year should also be measured and the assessment updated accordingly throughout the EIS.
Response:	WEGH2 acknowledges that loss of habitat may also affect birds that winter in upland habitats within the Project Area. Wintering landbirds (e.g., finches, crossbills, chickadees) within the Project Area will experience the same habitat loss as reported for breeding landbirds. Similarly, a small number of raptor species that use upland habitats in winter will also experience habitat loss (the same as was reported for breeding season). This includes species such as Sharp-shinned Hawk and Great Horned Owl. Wintering seabird and shorebirds (e.g., Purple Sandpiper) are not expected to experience habitat loss from the project because these species winter in coastal habitats, outside of the Project Area. WEGH2 recognizes that coastal habitats within the Local Assessment Area (LAA) are important for staging shorebirds, seabirds and waterfowl during spring and fall migration. The Project Area is located outside of these areas so habitat loss is not expected for these species groups during migration. It is acknowledged that migratory landbirds that use upland habitats will experience habitat loss.
Supporting Documentation	None

Response to ECCC 14

Comment ID:	ECCC 14
Department:	Environment and Climate Change Canada
Branch/ Division:	
EIS Guidelines Reference (Where provided):	ECCC-14 7.0 Environmental Protection – Mitigation and Plans 7.2.8.1 Species at Risk Impacts Mitigation and Monitoring Plan 7.2.8.3. Avifauna Impacts Mitigation and Monitoring Plan
Reviewer’s Comment:	<p>13.0 Avifauna, Table 13.8 “Mitigation Measures: Avifauna” (p.41 of pdf)</p> <p>There are many examples of hedging and ambiguous language (e.g., “to the extent practicable”, “where practicable”, “where possible”, “where feasible”, “whenever possible” and “where applicable” in this table (and various sections of the EIS), and ECCC notes that many of the mitigation measures discussed are not relevant to avoiding impacts on migratory birds and species at risk.</p> <p>The EIS should clearly describe mitigation measures to avoid/minimize potential effects on migratory birds and species at risk, and where effects cannot be avoided / minimized, a proposed plan to mitigate residual impacts should be described as part of the EIS (e.g., monitoring plan, scheduling, buffers, biodiversity offsets, etc.).</p> <p>ECCC recommends removing ambiguous wording and clarifying commitments to implementing mitigation measures. Contingency plans identifying mitigation measures should be prepared to address all scenarios that may impact migratory birds and species at risk during all of times of the year and all project phases.</p> <p>In following the precautionary principle, ECCC recommends that the Proponent identify in this Mitigation Table proposed mitigation and monitoring measures to avoid adverse effects on migratory birds including preventative measures related wind farm project’s operations and maintenance during optimal bird and bat migration conditions (e.g., reducing cut-in speeds or altering the pitch/feathering of blades, monitoring weather conditions, temporary remote shutdowns, etc.).</p>
Response:	<p>WEGH2 acknowledges the ambiguity of these terms and is committed to working with regulators to develop clearly defined site-specific mitigation measures and monitoring plans, including the Species at Risk Impacts, Mitigation and Monitoring Plan (SAR IMMP) and Avifauna IMMP prior to Project construction at that site. The plans will incorporate mitigation measures and monitoring commitments in the Environmental Impact Statement (EIS) and this EIS Amendment, will reflect applicable conditions of release from the environmental assessment process, and will include information on how and when updates to the plans will be made. The plans will be developed in consultation with applicable regulators and will be submitted for review prior to Project construction at that site. WEGH2 is committed to an adaptive management approach, and as such, these plans are considered “living” documents that will be updated as applicable to capture Project design updates and results of ongoing environmental monitoring.</p>

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Comment ID:	ECCC 14
	<p>Mitigation and monitoring plans for the Project on avifauna will be further developed in consideration of:</p> <ul style="list-style-type: none"> • Findings of baseline radar (and weather) data on birds (which is to begin during construction as per EIS Guidelines Section 4.3.3 a) iii) and other baseline data as appropriate • Industry best practices • Input from the Provincial Department of Fisheries, Forestry and Agriculture • Input from Environment and Climate Change Canada – Canadian Wildlife Service (ECCC-CWS) <p>Detailed monitoring and mitigation procedures will be incorporated into the Avifauna IMMP as will the need for additional measures and an adaptive management framework based on the findings of baseline data. The Avifauna IMMP (and other monitoring plans) will be prepared prior to Project construction as required in Section 7.2.8.4 of the EIS Guidelines.</p>
Supporting Documentation	None

Response to ECCC 15

Comment ID:	ECCC 15
Department:	Environment and Climate Change Canada
Branch/ Division:	
EIS Guidelines Reference (Where provided):	<p>ECCC-15 4.3.3 Terrestrial Environment a. and b. And 7.2.8.3 Avifauna Impacts Mitigation and Monitoring Plan</p>
Reviewer’s Comment:	<p>(a) ECCC is of the view that the project could cause potential impacts on lower altitude bird movements (e.g., shorebirds, waterfowl/sea duck), including from power lines, and any new power lines sited along the coast going west from the hydrogen station and port towards the Codroy windfarm.</p> <p>(b) 13.0 Avifauna, section 13.5.1 Habitat loss and 13.5.1.2 Operation and Maintenance - Shorebirds (p. 59 of pdf), ECCC is of the view that this section does not consider daily movements between shorebirds sites (e.g., potential movements from Picadilly Head to Stephenville Crossing or from Shoal Point to Sandy Point). When obstacles are added in the airways in areas where they previously did not exist (e.g., power lines over the treeline), habitat is being fragmented and lost.</p> <p>(c) Figures below from NB and NS shorebird staging movement data from a satellite tagged Lesser Yellowlegs collected over a period of 5 weeks and 2 weeks (all points with a 250m precision estimate – category 3). ECCC does not have data for the Project area under review, however, these figures provide examples of inland/overland movements of shorebirds.</p>

Comment ID:	ECCC 15
Response:	<p>(a) WEGH2 understand that the Project may cause potential impacts to lower altitude birds. Wherever possible, the 230kv transmission lines have been routed parallel to existing lines. Approximately 98 km of the lines will parallel existing infrastructure, including most of the proposed route between the hydrogen / ammonia plant to the Codroy Wind Farm. Baseline data on migration movements and flight paths collected in 2023 will provide additional information on bird movements within the Port au Port Peninsula, and data collected in 2024 will address bird movements in the Codroy Wind Farm area in the Anguille Mountains. Results of these surveys will be integrated in the Avifauna Impacts, Mitigation and Monitoring Plan (IMMP).</p> <p>(b) A review of the scientific literature found that shorebirds tend to roost and feed at locations that are close together to reduce energy expenditure. Studies have found that foraging and roost sites tend to be within 3 km (e.g., Li et al. 2023, Bakker et al. 2014, Rogers et al. 2010). Observations made during shorebird surveys and migration surveys in 2023 did not show any large daily movements, such as moving from Picadilly Head to Stephenville Crossing (results will be summarized in the 2023 Final Avifauna Baseline Report). The radar study that is planned for 2024 will collect information on movements of birds. Results of the radar study will inform the development of / updates to the Avifauna IMMP. WEGH2 recognizes that the addition of transmission lines has the potential to alter habitat. To mitigate the potential impacts, WEGH2 is paralleling lines with existing infrastructure. The installation of bird deterrents (e.g., flappers) in areas with regular bird movements or near sensitive habitats can be discussed during development of the IMMP.</p> <p>(c) Thank-you for passing along this information from Nova Scotia. It should be noted that there are no inland marshes within Port au Port Peninsula, so it is considered a low likelihood that birds are traveling from coastal to inland areas. However, it is acknowledged that some birds may make inland movements (e.g., for roosting). Results from 2023 shorebird surveys and migration counts will be integrated into the Avifauna IMMP to address these concerns.</p> <p>References:</p> <p>Bakker, Wiene, Bruno J. Ens, Adriaan M. Dokter, Henk-Jan van der Kolk, Kees Rappoldt, Martijn van de Pol, Henk W. van der Veer, Allert I Bijleveld, Japp van der Meer, Kees Oosterbeek, Eelke Jongejans and Andrew M. Allen. 2021. Connecting foraging and roosting areas reveals how food stocks explain shorebird numbers. <i>Estuarine Coastal and Shelf Science</i> 259(1):107458. DOI: 10.1016/j.ecss.2021.107458</p> <p>Li, Xiaowei, Xiyong Hou, Kai Shan, Yubin Liu, Yang Song, Xiaoli Wang, Peipei Du, Chao Fan. 2023. Identifying shorebird conservation hotspots and restoration gaps in stopover sites: A perspective of 'ecologically linked' habitats. <i>Global Ecology and Conservation</i>. Volume 48. https://doi.org/10.1016/j.gecco.2023.e02725.</p> <p>Rogers, Danny I., Ashley Herrod, Peter Menkhors, Richard H. Loyn. 2010. Local movements of shorebirds and high-resolution mapping of shorebird habitat in the Port Phillip Bay (Western Shoreline) and Bellarine Peninsula Ramsar Site. Arthur Rylah Institute for Environmental Research Technical Report Number 207DOI: 10.13140/RG.2.1.4655.3365</p>

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Comment ID:	ECCC 15
Supporting Documentation	None

Response to ECCC 16

Comment ID:	ECCC 16
Department:	Environment and Climate Change Canada
Branch/ Division:	
EIS Guidelines Reference (Where provided):	ECCC-16 6.2 Predicted Environmental Effects of the Undertaking 7.2.8.3 Avifauna Impacts Mitigation and Monitoring Plan
Reviewer’s Comment:	<p>(a) 13.0 Avifauna, section 13.5.1.2 Operation and Maintenance, Table 13.11 “Summary of Effects on change in Habitat by Project Component During Operation and Maintenance” (p. 62 of pdf), ECCC notes that the Proponent indicates that “there are no direct or indirect effects on habitat loss during operation and maintenance of transmission lines and substation”. ECCC disagrees with this statement.</p> <p>ECCC is of the view that the loss of habitat and increases in collision risks from transmission lines have not been adequately characterized in the EIS, and measures have not been identified to avoid/minimize the risk.</p> <p>(b) ECCC recommends that the Proponent consider where the proposed interconnections transmission lines right-of-way intersect areas used as flight paths by birds (e.g. migration, travel routes from nesting to foraging areas, watercourses and streams used by waterfowl) and demonstrate how the proposed configuration is optimal for avoiding avian collisions and electrocution. Existing infrastructure, such as the existing transmission lines, wind energy project(s), as well as any new infrastructure which could impact migratory birds should also be considered as part of the cumulative effects assessment. If available, wildlife monitoring data from existing and adjacent infrastructure/projects should be considered.</p> <p>(c) 13.0 Avifauna, Table 13.8 “Mitigation Measures: Avifauna” (p.41 of pdf) ID #73, ECCC notes that “a post-construction wildlife mortality monitoring program will be established, and carcass searches will be conducted at the turbines between April and October”, however, this does not include monitoring transmission lines in areas where flight paths of migratory birds such as water birds, waterfowl / sea duck and shorebirds may intersect lines.</p> <p>For example, Bank Swallows move between coastal bank colonies and inland roost sites; shorebirds move overland from foraging to roosting sites and during pre-migration recruitment flights; sea ducks are low altitude nocturnal migrants (ECCC, 2022).</p> <p>(d) ECCC notes that the Port au Port peninsula and Stephenville region is an important staging area for western NL shorebird migrants. Stephenville Crossing has a high count (43) of Red Knot (listed as Endangered on Schedule 1 of SARA). There may also be a higher collision risk particularly in the section located between Piccadilly Head and Kippens. ECCC recommends the Proponent undertake a literature review of these areas to confirm.</p>

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	<p>(e) Recent shorebird telemetry data has shown that most shorebirds do not follow the shoreline but rather move inland many km on a regular basis, particularly species such as Lesser-Yellowlegs that can use both salt and freshwater wetlands, but also smaller species such as Semipalmated Sandpiper. Staging shorebirds move around a lot and are dependent on tide, wind direction, competition/food availability, presence of predators, disturbance etc. Some species (e.g., Whimbrel) move to small islands (like Red Island) at night to roost and return to the mainland in the day. Thus, installing additional overhead power lines in and around the Port au Port / Stephenville staging sites will likely increase the risk of strike as the birds move around the area, leading to injury and mortality.</p> <p>ECCC recommends that baseline monitoring, and a telemetry study be undertaken to characterize potential lower-level movements of birds which may be at risk of collision with transmission lines.</p> <p>(f) ECCC recommends that a post-construction mortality monitoring program be established which will monitor collisions with other infrastructure such as transmission lines.</p> <p>(g) 13.0 Avifauna, Table 13.8, Mitigation Measures: Avifauna, ID#125 “Transmission line configurations, designed to limit overall height, will be used where practicable”. ECCC recommends the EIS includes further consideration of low altitude movements of migratory birds (e.g., shorebirds, waterfowl/seaduck and waterbirds) based on a characterization of flight paths over the project area, including a discussion of potential impacts of transmission lines during operational phase, and the Proponent should prepare mitigation measures and a monitoring plan accordingly.</p> <p>(h) ECCC recommends that the Proponent refer to Avian Power Line Interaction Committee (www.aplic.org) for an understanding of avian risks from power lines and guidance. Possible mitigation could also include the use of “flappers” on power lines to reduce strike: https://www.sciencedaily.com/releases/2020/06/200624151533.htm</p> <p>(i) ECCC recommends the proponent consider installing underground transmission lines in high-risk areas for bird collisions.</p>
Response:	<p>(a) WEGH2 understands the inherent interdependence of habitat loss and mortality risk, but for the purposes of the Environmental Impact Statement (EIS), these two factors have been separated. Habitat changes are not anticipated during Operation and Maintenance activities, as infrastructure will already be in place by this time. Mortality risk is expected to increase during Operation and Maintenance from increased collision potential. Increased risks are categorized accordingly in Section 13.5.2 (Avifauna, Change in Mortality) of the EIS, and mitigation measures are discussed for these risks in Section 13.5.2 (Avifauna, Change in Mortality) and Section 13.4 (Avifauna, Mitigation Measures) of the EIS.</p> <p>(b) WEGH2 acknowledges that the addition of new infrastructure may increase the risk to birds. WEGH2 is committed to completing the analysis and reporting on Project-specific data that were collected in 2023 and continuing with data collection in 2024 and beyond as part of a mitigation and monitoring plan.</p> <p>Since submission of the EIS, WEGH2 has been working on design features of proposed transmission poles and lines including consideration of flappers on lines and other measures to reduce the risk of bird entanglement/collision/electrocution such as adequate spacing between conductors/circuits. Sensitive areas will be</p>

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	<p>identified in conjunction with the Government of Newfoundland and Labrador Department of Fisheries, Forestry and Agriculture (NLDFFA) - Wildlife Division and Environment and Climate Change Canada - Canadian Wildlife Service (ECCC-CWS). It should be noted that approximately 98.5 km of transmission lines have been sited parallel to existing infrastructure.</p> <p>WEGH2 is consulting specific guidance documents such as:</p> <ul style="list-style-type: none"> • APLIC. 2012. Reducing avian collisions with power lines – the state of the art in 2012. Edison Electric Institute and the Avian Power Line Interaction Committee. Washington, D.C. 184 p. • APLIC and USFWS. 2005. Avian protection plan (APP) guidelines. A joint document prepared by the Edison Electric Institute’s Avian Power Line Interaction Committee (APLIC) and the US Fish and Wildlife Service (USFWS). Washington, D.D. 88 p. • Stantec. 2018. Bird beneficial management practices guide for utilities. Prepared for Canadian Electricity Association, prepared by Stantec Consulting Ltd. 44 p. <p>WEGH2 will also consult with Newfoundland Power to discuss effectiveness of mitigation measures for avifauna currently in use and potentially planned for future.</p> <p>(c) WEGH2 is committed to post-construction monitoring and will amend the plan to include carcass surveys of areas where transmission lines intersect migration corridors, and where there may be higher potential for collisions. The plan, and thus the survey sites, will be developed in consultation with the NLDFFA - Wildlife Division and ECCC - CWS.</p> <p>(d) WEGH2 is committed to completing the analysis and reporting on Project-specific data that were collected in 2023 and continuing with data collection in 2024 and beyond as part of a mitigation and monitoring plan. These site-specific reports/data will be provided to regulators prior to Project construction at that site, either as a standalone submission or as part of developing the required mitigation and monitoring plans. The avifauna program includes surveys at multiple locations between Piccadilly Head and Kippens, and WEGH2 is committed to identifying areas where large numbers of birds congregate, and areas where collisions risks are elevated. Mitigation measures for these collisions are discussed in Section 13.4 (Avifauna, Mitigation Measures) of the EIS.</p> <p>Red Knots are known to use Newfoundland as a migratory stopover site during fall migration (Garland and Thomas 2009). Available data on e-bird suggests that, as identified in this comment, Stephenville Crossing is an important staging area for Red Knot. While there are observations of Red Knot in the identified zone (Piccadilly Head and Kippens), there do not seem to be any point where large numbers congregate (eBird 2023). Mitigation described in the EIS and the additional use of flappers committed to in this amendment will be implemented to limit the effects to these species.</p> <p>(e) WEGH2 is committed to completing the analysis and reporting on Project-specific data that were collected in 2023, and continuing with data collection in 2024 and beyond as part of a mitigation and monitoring plan. These site-specific reports/data will be provided to regulators prior to Project construction at each site, either as a standalone submission or as part of developing the required mitigation and monitoring plans. Data collected during baseline surveys in 2023 will increase our understanding of inland and coastal movements of birds, and a</p>

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	<p>radar study planned for 2024 will provide additional data to categorize large-scale avian movements. At this time a telemetry study is not feasible; however, available telemetry data will be reviewed prior to finalization of avian monitoring and management plans. WEGH2 will work with both the NLDFFA - Wildlife Division and ECCC - CWS to determine the appropriate format and timing for providing reports/data.</p> <p>(f) As indicated in response to ECCC 16 sub-comment c, the post-construction monitoring plan will be adapted to include the requested additional infrastructure.</p> <p>(g) As indicated in response to ECCC 16 sub-comments a, c, and e, WEGH2 is committed to amending the mitigation measures and post-construction monitoring plans to further consider the effects of the Project on low-altitude avian movements.</p> <p>(h) Noted. This resource has and will continue to be reviewed and considered in relevant monitoring and management plans.</p> <p>(i) Noted. The installation of underground transmission lines is not feasible.</p> <p>References:</p> <p>APLIC. 2012. Reducing avian collisions with power lines – the state of the art in 2012. Edison Electric Institute and the Avian Power Line Interaction Committee. Washington, D.C. 184 p.</p> <p>APLIC and USFWS. 2005. Avian protection plan (APP) guidelines. A joint document prepared by the Edison Electric Institute’s Avian Power Line Interaction Committee (APLIC) and the US Fish and Wildlife Service (USFWS). Washington, D.D. 88 p.</p> <p>Baker, A., P. Gonzalez, R. I. G. Morrison, and B. A. Harrington (2020). Red Knot (<i>Calidris canutus</i>), version 1.0. In Birds of the World (S. M. Billerman, Editor). Cornell Lab of Ornithology, Ithaca, NY, USA. https://doi.org/10.2173/bow.redkno.01</p> <p>eBird. 2023. eBird: An online database of bird distribution and abundance [web application]. eBird, Cornell Lab of Ornithology, Ithaca, New York. Available: http://www.ebird.org. (Accessed: Date January 17, 2023).</p> <p>Garland, S. and P. Thomas. 2009. Recovery Plan for Red Knot, rufa subspecies (<i>Calidris canutus rufa</i>), in Newfoundland and Labrador. Wildlife Division, Department of Environment and Conservation, Government of Newfoundland and Labrador, Corner Brook, NL. iv + 12 pp.</p> <p>Stantec. 2018. Bird beneficial management practices guide for utilities. Prepared for Canadian Electricity Association, prepared by Stantec Consulting Ltd. 44 p.</p>
Supporting Documentation	None

Response to ECCC 17

Comment ID:	ECCC 17
Department:	Environment and Climate Change Canada
Branch/ Division:	
EIS Guidelines Reference (Where provided):	ECCC-17 6.2 Predicted Environmental Effects of the Undertaking e.ii And 6.3 Accidents and Malfunctions g) And 7.1 Mitigations ii. And 7.2.1 Emergency Response / Contingency Plan j)
Reviewer’s Comment:	13.0 Avifauna, section 13.5.2 Change in Mortality, 13.5.2.2 Operation and Maintenance – Shorebirds (p. 75 of pdf) It is stated: “Migrating and wintering shorebirds (Purple Sandpiper) are not expected to experience an increase in mortality from wind turbines because staging and wintering areas are located outside of the LAA and these species are unlikely to fly across the area where wind turbines will be sited. An increase in shorebird mortality from collisions with transmission lines is not expected because shorebirds are unlikely to be flying in areas where transmission lines will be sited.” ECCC disagrees with this statement since it does not take into account daily overland movements of staging shorebirds. Recent telemetry data has shown that most shorebirds do not follow the shoreline but rather move inland many kilometers on a regular basis, particularly species such as Lesser-Yellowlegs that can use both salt and freshwater wetlands, but also smaller species such as Semipalmated Sandpiper. Staging shorebirds movements are also dependent on tide, wind direction, competition/food availability, presence of predators, disturbance, etc. Some species (e.g., Whimbrel) move to small islands (like Red Island) at night to roost and return to the mainland in the day. Thus, installing additional overhead power lines in and around the Port au Port / Stephenville staging sites will likely increase the risk of strikes, leading to injury and mortality as birds move around the area.
Response:	WEGH2 is committed to accurately categorizing the effects of the Project on avifauna and has noted this comment. WEGH2 is committed to completing the analyses and reporting on Project-specific data that were collected in 2023, and continuing with data collection in 2024 and beyond as part of a mitigation and monitoring plan. These site-specific reports/data will be provided to regulators prior to Project construction at each site, either as a standalone submission or as part of developing the required mitigation and monitoring plans (e.g., Avifauna Impacts, Mitigation and Monitoring Plan (IMMP), Species at Risk IMMP). WEGH2 will work with the Newfoundland and Labrador Department of Fisheries, Forestry and Agriculture (NLDFFA) - Wildlife Division and Environment and Climate Change Canada - Canadian Wildlife Service (ECCC - CWS) to determine the appropriate format and timing for providing reports/data.

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	<p>Please consider the identified text:</p> <p>“Migrating and wintering shorebirds (Purple Sandpiper) are not expected to experience an increase in mortality from wind turbines because staging and wintering areas are located outside of the LAA and these species are unlikely to fly across the area where wind turbines will be sited. An increase in shorebird mortality from collisions with transmission lines is not expected because shorebirds are unlikely to be flying in areas where transmission lines will be sited.”</p> <p>to be replaced with the following text:</p> <p>“Migrating and wintering shorebirds (Purple Sandpiper) may experience a low magnitude increase in mortality from wind turbines. While staging and wintering areas are located outside of the LAA, flight paths are not well known and some individuals may cross over land. Similarly, a low magnitude increase in shorebird mortality from collisions with transmission lines is also possible because shorebirds may fly through areas where transmission lines will be sited.”</p> <p>Given the added mitigation measures, and the nature of the revised text, the change in this text does not change the overall assessment of risk as presented in the Environmental Impact Statement.</p>
Supporting Documentation	None

Response to ECCC 18

Comment ID:	ECCC 18
Department:	Environment and Climate Change Canada
Branch/ Division:	
EIS Guidelines Reference (Where provided):	ECCC-18 4.3 Baseline Studies 4.3.3 Terrestrial Environment
Reviewer’s Comment:	<p>Appendix BSA-3, Section 4 Avifauna Baseline Studies - Assessing daily movements of staging shorebirds</p> <p>(a) Data from the Atlantic Canada Shorebird Survey is insufficient to inform understanding of baseline and over-land movements of shorebirds. ECCC recommends that a telemetry study would be required in order to properly determine if and how much shorebirds move throughout the project area during staging.</p> <p>(b) Given the Project’s timelines, ECCC recommends that the Proponent assume that shorebirds will indeed fly often through areas with turbines and power lines during the fall migration staging period, and identify a monitoring plan that monitors shorebirds movements throughout the day and night considering tidal and lunar cycle, and prepare a mitigation plan accordingly.</p>

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Comment ID:	ECCC 18
Response:	<p>(a) WEGH2 agrees that data from the Atlantic Canada Shorebird Survey are insufficient to understand overland movements of shorebirds and were instead used to identify areas of concentration, survey locations and Species at Risk (SAR). Migration surveys and shorebird counts were completed in 2023 to gather information on movements. Results of these surveys will be summarized in the 2023 Avifauna Baseline Report. Interim results are presented in Appendix 2-B of this Environmental Impact Statement (EIS) Amendment. A telemetry study, however, is beyond the scope of the EIS.</p> <p>(b) One year of shorebird monitoring (spring and fall) was completed in 2023 and a second year is planned for 2024. Radar studies are also planned for 2024, which will provide further insight into bird movements (including nocturnal).</p> <p>WEGH2 is committed to developing site-specific mitigation and monitoring plans, including the Avifauna Impact, Mitigation and Monitoring Plan (IMMP) and SAR IMMP prior to Project construction at each site. The plans will incorporate mitigation measures and monitoring commitments in the EIS and this EIS Amendment, will reflect applicable conditions of release from the environmental assessment process, and will include information on how and when updates to the plans will be made. The plans will be developed in consultation with applicable regulators and will be submitted for review prior to Project construction at each site. WEGH2 is committed to an adaptive management approach, and as such, these plans are considered “living” documents that will be updated as applicable to capture Project design updates and results of ongoing environmental monitoring.</p>
Supporting Documentation	Appendix 2-B 2023 Interim Bird and Bat Technical Data Report

Response to ECCC 19

Comment ID:	ECCC 19
Department:	Environment and Climate Change Canada
Branch/ Division:	
EIS Guidelines Reference (Where provided):	ECCC-19 4.3 Baseline Studies 4.3.3 Terrestrial Environment
Reviewer’s Comment:	<p>Appendix BSA-3, Section 4 Avifauna Baseline Studies - Assessing daily movements of staging shorebirds</p> <p>ECCC notes that the project footprint has expanded to include some of the high ground in the surrounding areas. If sea duck are making regular movements over the high areas of the west coast, they could be vulnerable.</p> <p>ECCC notes that we have little information on sea duck use of coastal areas in LAA/RAA for the Project. For sea duck, the spring birds appear to move up the west coast, birds on south east may cross overland, and birds from the wintering areas around the Isle de Magdalene and passing though Nova Scotia cross the Gulf and converge at the Port-au-Port area.</p>

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Comment ID:	ECCC 19
	<p>ECCC notes that there is a gap in the data to determine if sea duck actually cross over the Port-au-Port Peninsula, or if they circumnavigated around it, but it is known that they converge around the Port-au-Port Peninsula. We know the eiders are vulnerable to wire strikes during periods of low visibility and these conditions are very common on the Gaffs and the Port-au-Port in spring.</p> <p>Since the project was first registered, the project footprint has changed and expanded, and there is new information available from the eider telemetry project which show the fall https://rpubs.com/GillilandSG/1085924 and spring https://rpubs.com/GillilandSG/1085936 migrations from the eiders in the telemetry tracking study. Note: this data has been thinned to keep the file small enough the webpage is responsive - but we can see there is some use of the Port-au-Port area in the fall. There is information to suggest that Eider cross over the Port-au-Port and the Bay of St. George climb up at least to 2000’ and cross the Gaff Topsails.</p> <p>ECCC notes that there are gaps in our knowledge of sea duck use that should be addressed and we recommend a deeper analysis of the available telemetry data (and more data will be available soon).</p>
Response:	<p>WEGH2 recognizes the gaps that exist in our knowledge of sea duck use of the area. WEGH2 is committed to completing the analysis and reporting on Project-specific data that were collected in 2023, and continuing with data collection in 2024 and beyond as part of a mitigation and monitoring plan. These site-specific reports/data will be provided to regulators prior to Project construction at each site, either as a standalone submission or as part of developing the required mitigation and monitoring plans (e.g., Avifauna Impacts Mitigation and Monitoring Plan (IMMP), Species at Risk (SAR) IMMP). A radar study is also planned for 2024, which will provide additional information on movements of birds with the Local Assessment Area. WEGH2 will work with the Newfoundland and Labrador Department of Fisheries, Forestry and Agriculture (NLDFFA) - Wildlife Division and Environment and Climate Change Canada - Canadian Wildlife Service (ECCC – CWS) to determine the appropriate format and timing for providing reports / data.</p> <p>Thank you for providing available data. Preliminary review of the eider telemetry data indicates that a few individuals tagged for this study cross the Port au Port, and other portions of southwestern Newfoundland, with more crossing over land in the spring than in the fall. Most flights occur along coastlines or at sea. Based on periodic observations over several decades, and regular conversations with active birdwatchers from Stephenville who regularly visit the Port au Port Peninsula area, relatively low numbers of sea ducks migrate along the west coast of Newfoundland (B. Mactavish, LGL, pers. comm., 16 January 2024).</p> <p>Available data, including the telemetry data noted by ECCC, will be reviewed and incorporated into reports, as appropriate. WEGH2 is committed to an adaptive management approach, and as such, data that become available through the life of the Project will be incorporated into the applicable plans.</p>
Supporting Documentation	None

Response to ECCC 20

Comment ID:	ECCC 20
Department:	Environment and Climate Change Canada
Branch/ Division:	
EIS Guidelines Reference (Where provided):	ECCC-20 4.3 Baseline Studies 4.3.3 Terrestrial Environment
Reviewer’s Comment:	<p>13.0 Avifauna, Section 13.5.1 - Change in Habitat ss. Raptors (p. 53 of pdf), it is stated that “During migration... relatively small numbers of raptors pass through the RAA...”, ECCC recommends including a source for this statement. It is also stated that there “no known bottleneck”, however, ECCC disagrees with this statement and is of the view that the Port-au-Port peninsula could be a concentrator of migrating raptors as they usually migrate along waterways and coastlines.</p> <p>ECCC recommends diurnal raptor surveys be undertaken to determine raptor count for the Port au Port Peninsula. Our comments on raptors are based on available ECCC expertise, but we recognize that in this area the technical expertise and authority lies with the province.</p>
Response:	<p>The following statement:</p> <p><i>“During migration, adverse effects relating to the direct and indirect loss or alteration of habitat on raptors will negligible; relatively small numbers of raptors pass through the RAA and there are no known bottlenecks that concentrate the migrating raptors.”</i></p> <p>Should be considered revised to:</p> <p><i>“During migration, adverse effects relating to the direct and indirect loss or alteration of habitat on raptors will be low”.</i></p> <p>While a review of background data for the Regional Assessment Area (RAA) did not show any large concentrations of raptors within the RAA (eBird 2023), WEGH2 acknowledges that there is a lack of available background data, particularly for the Codroy Wind Farm area on raptor numbers and concentrations.</p> <p>In 2023, stationary diurnal surveys for landbird / raptor migration were conducted at 18 sites on the Port au Port Peninsula and in the Stephenville area. The sites were selected in part based on the likelihood that geography would concentrate bird movements (to be discussed in the 2023 Interim Bird and Bat Technical Data Report) and in part to allow for a large, uninterrupted field of view in all directions from the survey vantage point, when possible. Surveys were conducted throughout the spring and fall migration periods, with 5 visits to each site in spring and 6 visits to each site in fall. All species that were visually observed within a 500 m radius were recorded and flight behaviour was documented (direction, height, distance bearing). The survey period was 30-minutes in duration.</p> <p>A second year of diurnal raptors surveys is planned for the Port au Port Peninsula in 2024 and a first year of raptor surveys is planned for Codroy in 2024.</p>

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Comment ID:	ECCC 20
	Reference: eBird. 2023. eBird: An online database of bird distribution and abundance [web application]. eBird, Cornell Lab of Ornithology, Ithaca, New York. Online: http://www.ebird.org
Supporting Documentation	Appendix 2-B 2023 Interim Bird and Bat Technical Data Report

Response to ECCC 21

Comment ID:	ECCC 21
Department:	Environment and Climate Change Canada
Branch/ Division:	
EIS Guidelines Reference (Where provided):	ECCC-21 6.2 Predicted Environmental Effects of the Undertaking 7.2.8.3 Avifauna Impacts Mitigation and Monitoring Plan
Reviewer’s Comment:	13.0 Avifauna, Section 13.5.2 Operation and Maintenance, Waterfowl section (p. 59 of pdf), ECCC notes that “Although many studies have shown displacement of breeding waterfowl, the mean displacement distance was 116 m in a systematic review of the literature available on bird displacement due to wind turbines (Marquest et al. 2021). Based on this a small indirect loss of habitat is expected for breeding waterfowl in areas where wind turbines are within 200m.” ECCC recommends identifying maximum disturbance area for breeding waterfowl discussed based on the literature (i.e., not just the mean) and buffered on potential impact maps.
Response:	WEGH2 is committed to accurately representing the effects of the Project. While the mean was presented in the Environmental Impact Statement (EIS), Marques et al. (2021) presented the means (116 m as reported in the EIS) along with the standard deviation (± 64 m) and the range of displacements identified in the study (50 – 200 m). In the EIS, it is stated that a small indirect loss of habitat for breeding waterfowl in areas where wind turbines are within 200 m is expected. This was based on the maximum disturbance area reported by Marques et al. 2021. The displacement of waterfowl is discussed in Section 13.5.1.2 of the EIS. There are currently no maps or figures that illustrate these displacements; such a figure was not expected to add further insight to the EIS. Reference: Marques, A.T., H. Batalha, J. Bernardino. 2021. Bird Displacement by Wind Turbines: Assessing Current Knowledge and Recommendations for Future Studies. <i>Birds</i> 2: 460–475. https://doi.org/10.3390/birds2040034
Supporting Documentation	None

Response to ECCC 22

Comment ID:	ECCC 22
Department:	Environment and Climate Change Canada
Branch/ Division:	
EIS Guidelines Reference (Where provided):	ECCC-22 7.2.8.3 Avifauna Impacts Mitigation and Monitoring Plan
Reviewer’s Comment:	<p>13.0 Avifauna, Section 13.3.3 “Potential Environmental Effects, Project Pathways, and Measurable Parameters”, Table 13.6 (p. 34 of pdf), ECCC notes that the Effect Pathways during construction and operations “could result in direct increase in mortality risk or number of bird fatalities (including nests/eggs) through vegetation clearing activities, vehicular collisions, wind turbine strikes, transmission lines strikes.”</p> <p>ECCC recommends adding mortality caused by bird attraction to lights and collisions at substations, the hydrogen / ammonia processing facilities, including flare stack, and port facilities, and a consideration of mortality events (particular in the spring and fall, and during periods of inclement weather such as fog).</p> <p>ECCC notes that bird attraction to lights and flaring is discussed in sections that follow this table (section 13.5.2.2 Operation and Maintenance, p. 74 of pdf). However, ECCC notes that Table 13.8 “Mitigation Measures: Avifauna” discusses artificial lighting only during the construction phase and not operational phase.</p> <p>ECCC recommends identifying mitigation measures for avoiding/minimizing impacts from light attraction from Project infrastructure, including at substations and Hydrogen / Ammonia processing facilities (flare stacks), during operational and decommissioning phases. Mitigation measures should include timing flaring events, monitoring weather conditions, to avoid large bird mortality events during particularly sensitive times of year and/or inclement weather conditions when visibility is reduced, and, monitoring and reporting procedures for site staff for stranded birds (e.g., reporting stranded bird and mortality events).</p>
Response:	<p>WEGH2 agrees that bird mortality could be influenced by artificial light, inclement weather, and flaring activities, and could occur at substations, the hydrogen / ammonia processing facilities, port facilities, and other sites where Project infrastructure exists.</p> <p>WEGH2 is committed to mitigation measures that limit the effects at relevant stages of the Project, and agree that attraction to light and flaring events are likely to affect birds through operation. Mitigation measures that have been outlined for the construction phases will also be applied to the operation and maintenance phase where applicable.</p> <p>Safety flaring events are not scheduled events and thus cannot be timed to avoid high-risk conditions. Weather will be monitored and routine (non-emergency) flaring will be scheduled to avoid migration periods and to avoid periods with fog, rain, or low cloud ceiling. During spring and fall migration, at dawn after flaring events (non-routine, emergency) or nights with fog, rain, or low cloud ceiling, searches for grounded birds will be conducted at the hydrogen/ammonia production and storage facilities, especially below and around the flare stack. The search effort will be designed and documented, and the results of searches</p>

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Comment ID:	ECCC 22
	<p>reported in accordance (as applicable) with the ECCC document Guidance for Developing Systematic Stranded Bird Survey Protocols for Vessels and Platforms (ECCC 2021).</p> <p>Reference: ECCC (Environment and Climate Change Canada). 2021. ECCC-CWS Guidance for Developing Systematic Stranded Bird Survey Protocols for Vessels and Platforms. 3 p. + 3 appendices.</p>
Supporting Documentation	None

Response to ECCC 23

Comment ID:	ECCC23
Department:	Environment and Climate Change Canada
Branch/ Division:	
EIS Guidelines Reference (Where provided):	ECCC-23 8.0 Residual Effects and Determination of Significance
Reviewer’s Comment:	<p>13.0 Avifauna, Section 13.5 “Residual Environmental Effects” (p. 55 of the pdf): ss Landbirds, it is stated: “The residual effects of the construction phase on landbird habitat are expected to be adverse, moderate in magnitude, restricted to the LAA, occur during times of no sensitivity, be short-term in duration, continuous and reversible (Section 13.5.3.1)”.</p> <p>ECCC disagrees with this conclusion based on the mitigation measures identified in Table 13.8 Mitigation Measures: Avifauna. Based on the hedging statements in the mitigations table, it is unclear if the Proponent is committed to undertaking all of the Project construction during the winter. Migratory birds will be using the habitat for migration, breeding, or post- breeding.</p>
Response:	WEGH2 are planning consultation with Environment and Climate Change Canada to develop the Avifauna Impacts, Mitigation and Monitoring Plan.
Supporting Documentation:	None

Response to ECCC 24

Comment ID:	ECCC 24
Department:	Environment and Climate Change Canada
Branch/ Division:	
EIS Guidelines Reference (Where provided):	
Reviewer’s Comment:	<p>13.0 Avifauna, Section 13.5.1.2 “Operation and Maintenance” (p. 60 of pdf), ss Raptors, it is stated “There are no large numbers or concentrations of raptors within the RAA during spring or fall migration.”, however, the same sentence states “...current flight paths of raptors within the RAA are not known”.</p> <p>ECCC is of the view that EIS conclusions related to raptors are unfounded. ECCC recommends supporting EIS conclusions with references and baseline studies. Our comments on raptors are based on available ECCC expertise, but we recognize that in this area the technical expertise and authority lies with the province</p>
Response:	<p>This statement about no large numbers or concentrations of raptors within the Local Assessment Area (LAA) was based on a review of background data (eBird 2023) and local knowledge of the area. In general, there are no large concentrations of raptors passing through Newfoundland, compared to southern Canada. A review of eBird data from the last 10 years found that most raptor counts consisted of less than ten individuals. The exception was for concentrations of Bald Eagles or Osprey, but these were not migrating birds. It is acknowledged that this is not a complete data set and that at the time of writing the Environmental Impact Statement, data on movements of raptors within the LAA had not yet been gathered. In 2023, migration counts surveys were completed in the Port au Port area and surveys of Codroy are planned for 2024. Data collected from these surveys will be assessed and mitigation will be developed (if needed) within the Avifauna IMMP.</p> <p>Reference: eBird. 2023. eBird: An online database of bird distribution and abundance [web application]. eBird, Cornell Lab of Ornithology, Ithaca, New York. Online: http://www.ebird.org</p>
Supporting Documentation	None

Response to ECCC 25

Comment ID:	ECCC 25
Department:	Environment and Climate Change Canada
Branch/ Division:	
EIS Guidelines Reference (Where provided):	ECCC-24 7.0 Environmental Protection – Mitigations and Plans
Reviewer’s Comment:	<p>13.0 Avifauna, Table 13.8 Mitigation Measures: Avifauna, ID#37, 38, 265 (p. 44 of pdf), it is stated “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...”</p> <p>ECCC recommends restricting high disturbance activities such as vegetation clearing activities to outside of the regional nesting period for migratory birds to avoid impacts and ensure compliance with the Migratory Birds Convention Act (MBCA) and its associated regulations.</p> <p>ECCC does not recommend active nest searches in complex habitat (trees and shrubs) as they are unlikely to be successful in avoiding incidental take. Ground nesters, such as the threatened Common Nighthawk, are very cryptic and difficult to locate.</p> <p>Nest surveys may be carried out successfully by experienced observers using scientific methodology in the event that activities would take place in simple habitats (often in human-made settings) with only a few likely nesting areas or a small community of migratory birds.</p>
Response:	<p>WEGH2 agrees that nest searches are not an adequate mitigation measure for large, complex habitats. WEGH2 are planning consultation with Environment and Climate Change Canada to develop the Avifauna Impacts, Mitigation and Monitoring Plan.</p> <p>To date, there have been no breeding records of Common Nighthawk on the island of Newfoundland (B. Mactavish, LGL, pers. comm., 16 January 2024), but it is acknowledged that other ground nesting species and species with cryptic nests that are difficult to locate with standard nest search protocols may be present.</p> <p>WEGH2 agrees that nest searches will be completed by experienced biologists using industry approved standards.</p> <p>Reference: B. Mactavish, personal communication to LGL. January 16 2024</p>
Supporting Documentation	None

Response to ECCC 26

Comment ID:	ECCC 26
Department:	Environment and Climate Change Canada
Branch/ Division:	
EIS Guidelines Reference (Where provided):	ECCC-25 7.0 Environmental Protection – Mitigations and Plans
Reviewer’s Comment:	<p>13.0 Avifauna, Table 13.8 Mitigation Measures: Avifauna, ID#318 (p. 44 of pdf), it is stated “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.”</p> <p>Great Blue Herons (<i>Ardea herodias</i>) are large wading birds that frequent both marine and freshwater habitats. Great Blue Herons (GBHE) nest in breeding colonies or rookeries that tend to be near foraging habitat. As noted above, rookeries are re-used every year and nests are protected year-round.</p> <p>GBHE are susceptible to human disturbance during the breeding season, and will fly away if approached resulting in nests or chicks left unattended and vulnerable to predators or the elements. GBHE are also known to abandon their nests and entire colonies if a disturbance occurs during the periods of pair-formation, nest construction, or early egg-laying.</p> <p>ECCC recommends referencing the Newfoundland Breeding Bird Atlas Bird Nesting Calendar for breeding period for this species.</p> <p>ECCC recommends that the Proponent ensure that the Project staff, contractors, and equipment, do not access heron rookeries during courtship, nesting, and chick-rearing seasons (from mid-March through mid-August).</p> <p>ECCC recommends that no activities be conducted within 300 meters of the edge of a rookery during the spring and summer.</p> <p>ECCC recommends restriction activities with a high disturbance factor (e.g., drilling, blasting) within 1000 meters from the edge of a rookery during the spring and summer.</p> <p>ECCC recommends no habitat modification within 100 meters of the edge of a rookery.</p> <p>Rotary, fixed-wing aircraft, and drones cause disturbance of seabird and water bird colonies. If used in conducting surveys or monitoring, aircraft should be at least 300 meters above ground level when flying over colonies during the courtship, nesting, and chick-rearing seasons (spring and summer).</p>
Response:	<p>Thank-you for this information. WEGH2 will incorporate these recommended mitigation measures into the Avifauna Impact, Mitigation, and Monitoring Plan. In addition, WEGH2 will maintain a 300 m setback from heron colonies during the active season (April 1 to 15 August) and avoid high disturbance activities (e.g., blasting) within 1 km of heron colonies during active season. Surveys completed in 2023 and additional surveys planned for 2024 will survey for locations of heron nest colonies within and adjacent to the Project Area.</p>
Supporting Documentation	None

Response to ECCC 27

Comment ID:	ECCC 27
Department:	Environment and Climate Change Canada
Branch/ Division:	
EIS Guidelines Reference (Where provided):	ECCC-26 7.0 Environmental Protection – Mitigations and Plans
Reviewer’s Comment:	13.0 Avifauna, Table 13.8 Mitigation Measures: Avifauna, ID#41 (p. 44 of pdf), ECCC notes that mitigation for measures for reducing impacts related to light attraction should be included during all phases of the project for all project related components (e.g., substation, hydrogen / ammonia production facilities, roads, etc.) and activities (e.g., additional temporary lighting required during construction and decommissioning phases).
Response:	WEGH2 agrees that mitigation to reduce impacts related to light attraction should be included for all phases of the Project. Mitigation for light attraction will be developed for all Project phases within the Avifauna Impacts Mitigation and Monitoring Plan.
Supporting Documentation	None

Response to ECCC 28

Comment ID:	ECCC 28
Department:	Environment and Climate Change Canada
Branch/ Division:	
EIS Guidelines Reference (Where provided):	ECCC-27 2.3.3 Operation and Maintenance o) procedures for, and estimated frequency of, flaring and/or venting of hydrogen/ammonia And 7.0 Environmental Protection – Mitigations and Plans 7.2.1 Emergency Response/ Contingency Plan
Reviewer’s Comment:	13.0 Avifauna, Table 13.8 Mitigation Measures: Avifauna ECCC recommends including mitigation measures at the hydrogen / ammonia facility to address potential light attraction during planned and unplanned flaring events as discussed in section 13.5.2.2, which could result in increased bird (and bat) collisions / mortality and stranded birds. Stranded Birds Systematic Survey ECCC recommends daily systematic searches of stranded migratory birds with a documentation of effort (including days when searches were completed but no birds were found) following “ECCC Guidance for Developing Systematic Stranded Bird Survey Protocols for Vessels and Platforms” (March 2021)

<p>Comment ID:</p>	<p>ECCC 28</p>
	<p>(attached) which can be adapted to coastal inland sites in Atlantic Canada. Guidance, procedures, datasheets and educational resources are available for reference in the development of a monitoring plan and protocols. Infographics can be shared to support staff awareness about stranded birds.</p> <p>Guidance (available upon request) (not available online):</p> <ul style="list-style-type: none"> • Guidance for Developing Systematic Stranded Bird Survey Protocols for Vessels and Platforms (March, 2021) • Procedures for handling and documenting stranded birds encountered on infrastructure in offshore Atlantic Canada (ECCC, 2016) • Dark skies for night flights – Reducing storm-petrel strandings in Eastern Canada (ECCC, 2022) (infographic) • Stranded Bird Procedures (ECCC, 2021) (infographic) • Stranded Bird Encounter Datasheet (ECCC, March 2021)
<p>Response:</p>	<p>Mitigation measures to address attraction to flaring at night during routine (planned) and non-routine (emergency, unplanned) flaring events are described in the response to ECCC 22.</p> <p>WEGH2 will apply to Environment and Climate Change Canada (ECCC) for a Migratory Birds Scientific Permit. Search effort will be designed and documented as described in the response to ECCC-22, i.e., the distances required to search the facility will be measured, recorded and subdivided into designated sections or sectors of a grid.</p> <p>Searches will begin as soon after dawn as possible. Information about each search will be recorded including: the sections/sectors covered, start time, end time, weather during the preceding night, and the presence/absence of any potential predators. Searches and bird recoveries will be carried out in accordance with the ECCC document Procedures for Handling and Documenting Stranded Birds Encountered on Infrastructure Offshore Atlantic Canada (ECCC 2017). Personnel conducting the searches will be guided by the ECCC infographic Dark skies for night flights – Reducing storm-petrel strandings in Eastern Canada (ECCC 2022), the ECCC infographic Stranded Bird Procedures (Appendix 2 of ECCC (2021)) and the ECCC information sheet Protocol for Collection Dead Birds from Industrial Sites (for birds that are not associated with a pollution event) (ECCC 2016). During each search the numbers of birds of each species found alive and dead, the fate of live birds found, and section/sector where found will be recorded on the ECCC Stranded Bird Search and Encounter Datasheet (Appendix 1 of ECCC (2021) document) and reported to ECCC annually as per the conditions of the Migratory Birds permit. Live, healthy seabirds, e.g., storm-petrels, will be released at the coast after dark, away from artificial lighting in order to avoid predators.</p> <p>References:</p> <p>ECCC. 2016. Protocol for Collecting Dead Birds from Industrial Sites (For birds that are not associated with a pollution event). January 2016.</p> <p>ECCC. 2017. Procedures for Handling and Documenting Stranded Birds Encountered on Infrastructure Offshore Atlantic Canada -- Draft May 2017. Environment and Climate Change Canada. 17 p.</p> <p>ECCC. 2021. ECCC-CWS Guidance for Developing Systematic Stranded Bird Survey Protocols for Vessels and Platforms. 3 p. +appendices</p>

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Comment ID:	ECCC 28
	ECCC. 2022 Dark skies for night flights – Reducing storm-petrel strandings in Eastern Canada (infographic)
Supporting Documentation	None

Response to ECCC 29

Comment ID:	ECCC29
Department:	Environment and Climate Change Canada
Branch/ Division:	
EIS Guidelines Reference (Where provided):	ECCC-28 Avifauna Impacts Mitigation and Monitoring Plan 7.2.8.3
Reviewer’s Comment:	<p>13.0 Avifauna, Table 13.8 Mitigation Measures: Avifauna, ID #74, states “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.”</p> <p>It is unclear what the Proponent considers “high fatality rates”. ECCC notes that there are no guidelines for incidental take under the Migratory Birds Convention Act (MBCA).</p> <p>The EIS Concordance table states “The Avifauna Impacts Mitigation and Monitoring Plan will be completed and submitted to regulators prior to construction”.</p> <p>ECCC recommends that the Proponent provide project-specific details regarding its Monitoring and Adaptive Management Plan, including defining the basic elements (i.e. goals, targets, performance measures) of its plan, as part of the EIS.</p> <p>ECCC notes that the MBCA and associated regulations are not superseded either by the Conditions of Approval of a Provincial EA or by correspondence from the Newfoundland & Labrador Department of Environment and Climate Change. The Province does not have the authority to allow a Proponent to destroy the nests of birds protected under the MBCA.</p> <p>For all activities and during all Project phases, the Proponent must take measures to avoid the incidental take of migratory birds, nests, and eggs.</p>
Response:	As noted earlier, the Avifauna Impacts Mitigation and Monitoring Plan (IMMP; and other monitoring plans) will be prepared prior to Project construction as required in Section 7.2.8.4 of the EIS Guidelines. Detailed monitoring and mitigation procedures will be incorporated into the Avifauna IMMP as will the need for additional measures and an adaptive management framework based on the findings of baseline data collected in 2023 (and 2024) and input from Environment and Climate Change Canada – Canadian Wildlife Service (ECCC-CWS) and Newfoundland and Labrador Fisheries, Forestry and Agriculture – Wildlife Division. The Avifauna IMMP is considered a living document, which will be regularly updated in consideration of monitoring results.

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Comment ID:	ECCC29
	WEGH2 will take measures to avoid the incidental take of migratory birds, nests, and eggs throughout all Project phases. An adaptive management approach will be applied to the development of the Avifauna IMMP, in consultation with ECCC.
Supporting Documentation:	None

Response to ECCC 30

Comment ID:	ECCC 30
Department:	Environment and Climate Change Canada
Branch/ Division:	
EIS Guidelines Reference (Where provided):	ECCC-29 2.1 Study Areas c) iv. Habitats of federal or provincial listed species at risk And 4.0 Environment 4.1 Key Issues And 4.2.3 Terrestrial Environment c) And 4.3 Baseline Studies 4.3.3 a) Other Wildlife
Reviewer’s Comment:	<p>15.0 Other Wildlife, ECCC notes that the Project overlaps with the ranges of the Port au Port subpopulations (Caribou, Newfoundland Population, listed as Special Concern on Schedule 1 of SARA), per the Order Amending Schedule 1 to the Species at Risk Act.</p> <p>ECCC notes that the Proponent’s proposed mitigation measures listed in Table 15.20 “Mitigation Measures: Other Wildlife” (p. 182 of pdf) does not include measures to effectively avoid, reduce, or offset the residual and cumulative adverse effects of the Project on Caribou (Newfoundland population).</p> <p>A Management Plan is not yet available for this species, thus ECCC recommends the best available information in the assessment of effects on the species which are discussed in the “COSEWIC Assessment and Status Report on the Caribou Rangifer tarandus, Newfoundland Population, Atlantic-Gaspésie population, Boreal population in Canada” (2014) available at: wildlife-species.canada.ca/species-risk- registry/virtual_sara/files/cosewic/sr_Caribou_NF_Boreal_Atlantic_2014_e. pdf. This report lists the primary objective of caribou management in Newfoundland as the “maintenance of a sustainable population”. Per the 2014 COSEWIC Status Report, anthropogenic disturbance (resource extraction, forestry, linear features) influencing migration patterns is listed as a threat to Caribou (Newfoundland Population).</p> <p>Where adverse effects cannot be avoided or mitigated, ECCC recommends that the Proponent develop and implement a plan to address the residual adverse</p>

<p>Comment ID:</p>	<p>ECCC 30</p>
	<p>effects of the Project, and considering the principles that are described in the Operational Framework for Use of Conservation Allowances (ECCC, 2012).</p>
<p>Response:</p>	<p>WEGH2 acknowledges that all sub-populations of caribou on the Island of Newfoundland are listed as ‘Special Concern’ on Schedule 1 of the federal <i>Species at Risk Act</i>.</p> <p>The Committee on the Status of Endangered Wildlife in Canada (COSEWIC) (2014) identifies 36 sub-populations of caribou existing across the Island of Newfoundland in the 1990s, including the Port au Port sub-population that, along with other sub-populations, was established through a relocation program in the 1960-70s. Many relocated animals eventually died off or relocated to other areas, resulting in 14 sub-populations remaining in 2013, with no remaining sub-population on the Port au Port peninsula (Bergerud and Mercer 1989; COSEWIC 2014). Currently, there are 19 Caribou Management Areas (CMAs) on the Island of Newfoundland that correspond to the distribution of caribou herds (Schaefer and Mahoney 2013; GovNL 2023). Of these, the management area for the La Poile caribou herd (CMA 61) overlaps a small portion of the Project Area near the Cordroy wind farm. Global Positioning System (GPS) data from collared caribou from the La Poile herd indicate that seasonal ranges of the herd extend from an area east of Channel-Port-Aux-Basques to St. Albans, and northwards to Beothuk Lake (Marathon 2020), but caribou locations from collared individuals do not overlap the Project Area. There is, however, a small population of caribou using the Stephenville Crossing area during winter (< 100 individuals), which may have originated from the Port au Port herd (SaltWire 2019). The caribou in this area are found north of the proposed Project transmission line (Figure 15.3 in the Environmental Impact Statement (EIS)).</p> <p>WEGH2 is committed to mitigating potential effects on wildlife during Project construction and operation. Mitigation and monitoring protocols for wildlife, including caribou, will be included in the Environmental Protection Plan(s) which will incorporate mitigation measures and monitoring commitments in the EIS and this EIS Amendment. They will be developed in consultation with applicable regulators and will be submitted for review prior to Project construction. The plan(s) will reflect applicable conditions of release from the environmental assessment process and will include information on how and when updates will be made. WEGH2 is committed to an adaptive management approach, and as such, the Environmental Management Plans will be considered “living” documents that will be updated as applicable to capture Project design updates and results of ongoing environmental monitoring.</p> <p>References:</p> <p>Bergerud, A.T. and W.E. Mercer. 1989. caribou introductions in eastern North America. <i>Wildlife Society Bulletin</i> 17(2):11-120.</p> <p>COSEWIC (Committee on the Status of Endangered Wildlife in Canada). 2014. COSEWIC assessment and status report on the Caribou <i>Rangifer tarandus</i>, Newfoundland population, Atlantic-Gaspésie population and Boreal population, in Canada. Committee on the Status of Endangered Wildlife in Canada. Ottawa. xxiii + 128 pp.</p> <p>GovNL. 2023. 2023-2024 Hunting and Trapping Guide. Available online: https://www.gov.nl.ca/hunting-trapping-guide/2023-24/print/ (last accessed January 11, 2024).</p>

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	<p>SaltWire (SaltWire Newfoundland and Labrador News). 2019. Two theories on origin of caribou near Stephenville Crossing. Online article. Available online: https://www.saltwire.com/newfoundland-labrador/news/two-theories-on-origin-of-caribou-near-stephenville-crossing-297854/ (last accessed July 10, 2023).</p> <p>Schaefer, J.A. and S.P. Mahoney. 2013. Spatial dynamics of the rise and fall of caribou (<i>Rangifer tarandus</i>) in Newfoundland. Canadian Journal of Zoology 91: 767-774</p>
Supporting Documentation	None

Response to ECCC 31

Comment ID:	ECCC 31
Department:	Environment and Climate Change Canada
Branch/ Division:	
EIS Guidelines Reference (Where provided):	Other Wildlife
Reviewer’s Comment:	<p>15.0 Other Wildlife, Section 15.1.1 “Regulatory and Policy Setting” (p. 144 of pdf), ECCC recommends adding the “COSEWIC Assessment and Status Report on the Caribou <i>Rangifer tarandus</i>, Newfoundland Population Atlantic-Gaspésie population, Boreal population in Canada”(2014) available at Caribou, <i>Rangifer tarandus</i> caribou (canada.ca) to the bulleted list of important documents to be considered as part of the effects assessment.</p> <p>ECCC notes this report is referenced in section 15.11.1 Literature Cited.</p>
Response:	<p>WEGH2 acknowledges that the bulleted list of documents considered in the Environmental Impact Statement (EIS) in the assessment of potential Project-related environmental effects on the Other Wildlife Valued Ecosystem Component (Chapter 15.0, Section 15.1.1, p. 144 of the EIS) should have included the following document:</p> <ul style="list-style-type: none"> • COSEWIC Assessment and Status Report on the <i>Caribou Rangifer tarandus</i>, Newfoundland Population Atlantic-Gaspésie population, Boreal population in Canada (COSEWIC 2014). <p>Reference: COSEWIC (Committee on the Status of Endangered Wildlife in Canada). 2014. COSEWIC assessment and status report on the Caribou <i>Rangifer tarandus</i>, Newfoundland population, Atlantic-Gaspésie population and Boreal population, in Canada. Committee on the Status of Endangered Wildlife in Canada. Ottawa. xxiii + 128 pp.</p>
Supporting Documentation	None

Response to ECCC 32

Comment ID:	ECCC 32
Department:	Environment and Climate Change Canada
Branch/ Division:	
EIS Guidelines Reference (Where provided):	ECCC-30 Other Wildlife 8.0 Residual effects and Determination of Significance
Reviewer’s Comment:	<p>15.0 Other Wildlife, Section 15.3.1 “Residual Effects Characterization”, Table 15.17 (p. 171), ECCC notes that the characterization of the Magnitude of change measurable parameters is based only on habitat loss and changes in mortality.</p> <p>For caribou (Newfoundland Port-au-Port sub-population - SARA listed Special Concern), the amount of habitat is not necessarily limiting at this point. ECCC considers most important is the behavioural changes caribou may make when faced with linear features such as power lines, roads and turbines. Based on research, caribou tend to avoid these areas.</p> <p>ECCC recommends including an assessment of potential indirect effects on caribou in the EIS.</p> <p>Our comments on caribou are based on available ECCC expertise, but we recognize that in this area the technical expertise and authority lies with the province.</p>
Response:	<p>WEGH2 acknowledges that potential Project-related effects on caribou and other wildlife may include avoidance and other behavioural changes. The characterization of residual effects in the Environmental Impact Statement (EIS) therefore also assessed potential indirect effects on wildlife (Table 15.18 of the EIS), through the assessment of changes in movement paths or patterns arising from habitat loss, edge effects and/or sensory disturbance (e.g., avoidance of Project-related infrastructure) and changes in predator-prey dynamics and harvest pressure. As indicated in the EIS (Section 15.5.1.1 – Vegetation Clearing and Edge Effects), caribou are known to avoid such features as power lines, roads, and other areas of development (COSEWIC 2014, Dyer et al. 2001, Nagy 2011) and avoidance behaviours may result in a shift in home range (e.g., MacNearney et al. 2016), or a change in the timing and direction of caribou migration (e.g., Mahoney and Schaefer 2002) (EIS Section 15.5.1.1 – Sensory Disturbance). See response to comment ECCC 36 for additional context on potential indirect residual effects on caribou from habitat fragmentation and avoidance/displacement behaviours.</p> <p>References:</p> <p>COSEWIC (Committee on the Status of Endangered Wildlife in Canada). 2014. COSEWIC assessment and status report on the Caribou <i>Rangifer tarandus</i>, Newfoundland population, Atlantic-Gaspésie population and Boreal population, in Canada. Committee on the Status of Endangered Wildlife in Canada. Ottawa. xxiii + 128 pp.</p> <p>Dyer, S.J., J.P. O’Neill, S.M. Wasel, and S. Boutin. 2001. Avoidance of industrial development by woodland caribou. <i>Journal of Wildlife Management</i> 65: 531-542.</p>

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	<p>Mahoney, S.P. and J.A. Virgl. 2003. Habitat selection and demography of a nonmigratory woodland caribou population in Newfoundland. <i>Can. J. Zool.</i> 81: 321–334.</p> <p>Nagy, J. 2011. Use of space by caribou in northern Canada. Ph.D. Thesis, Biological Sciences, University of Alberta.</p>
Supporting Documentation	None

Response to ECCC 33

Comment ID:	ECCC 33
Department:	Environment and Climate Change Canada
Branch/ Division:	
EIS Guidelines Reference (Where provided):	<p>ECCC-31</p> <p>6.2 Predicted Environmental Effects of the Undertaking e) i. direct and indirect effects of Project construction, operation decommissioning and rehabilitation</p> <p>And</p> <p>6.4 Cumulative Environmental Effects d) describe the mitigation measures and determine the significance of the residual cumulative effects</p>
Reviewer’s Comment:	<p>(a) 15.0 Other Wildlife, Table 15.18 “Environmental Effects, Effect Pathways, and Measurable Parameters for Other Wildlife” (p. 173 of pdf), ECCC notes that the Effect Pathway(s) discusses changes in movement paths or patterns arising from habitat loss, edge effect and/or sensory disturbance (e.g., avoidance of Project-related infrastructure) and provides measurable parameters and units of measurement, however, estimated amounts of habitat loss (directly and indirectly through avoidance) are not included as part of the discussion of potential effects, nor are proposed mitigation measures to avoid/minimize the loss, monitor effects and mitigate residual losses (e.g. offsets).</p> <p>(b) ECCC recommends that the proponent consult the “COSEWIC Assessment and Status Report” for the Newfoundland Caribou Population (Caribou (<i>Rangifer tarandus</i>), Newfoundland population – Species search – Species at risk registry (canada.ca)) for information on threats to caribou and minimizing impacts to caribou populations.</p> <p>For caribou-specific cumulative effects, ECCC recommends that the proponent develop programs to reduce the uncertainty regarding caribou movements through the Project Area and increase conservation outcomes for this sub-population.</p> <p>Our comments on caribou are based on available ECCC expertise, but we recognize that in this area the technical expertise and authority lies with the province.</p>

Comment ID:	ECCC 33
Response:	<p>(a) The Project Area is the anticipated area of direct physical disturbance associated with the development of the Project and includes the estimated area of the Project footprint plus associated buffers to allow for flexibility for the micro-siting of Project components. The Local Assessment Area (LAA) is the area in which Project-related environmental effects (direct and indirect habitat loss) on other wildlife are assessed. The estimated area (km²) of direct habitat loss (i.e., Project Footprint) and indirect habitat loss (i.e., within the LAA) is provided in the Environmental Impact Statement (EIS) in Tables 15.5 through 15.16 for the assessed species and summarized in Table 15.21. Residual effects on habitat (directly and indirectly through avoidance) are discussed in Chapter 15 (Section 15.5.1) of the EIS. See also the response to comment ECCC 36 for additional context on potential indirect residual effects on caribou from habitat fragmentation and avoidance / displacement behaviours.</p> <p>(b) To reduce uncertainty regarding caribou use of in the Project Area, WEGH2 is committed to continuing with Project-specific data collection in 2024. WEGH2 will work with the Newfoundland and Labrador Department of Fisheries, Forestry and Agriculture - Wildlife Division to confirm the survey areas and approach for caribou. Data from these surveys will be provided to regulators prior to Project construction and will inform site-specific mitigation measures and monitoring plans for caribou.</p> <p>WEGH2 is committed to mitigating potential effects on wildlife during Project construction and operation. Mitigation and monitoring protocols for wildlife, including caribou, will be included in the Environmental Protection Plan(s) which will incorporate mitigation measures and monitoring commitments in the EIS and this EIS Amendment. They will be developed in consultation with applicable regulators and will be submitted for review prior to Project construction. The plan(s) will reflect applicable conditions of release from the environmental assessment process and will include information on how and when updates will be made. Mitigation and monitoring related to caribou specifically will incorporate information provided in the COSEWIC Assessment and Status Report (COSEWIC 2014) and other related documents.</p> <p>WEGH2 is committed to an adaptive management approach, and as such, the Environmental Management Plans will be considered “living” documents that will be updated as applicable to capture Project design updates and results of ongoing environmental monitoring.</p> <p>Reference: COSEWIC (Committee on the Status of Endangered Wildlife in Canada). 2014. COSEWIC assessment and status report on the Caribou <i>Rangifer tarandus</i>, Newfoundland population, Atlantic-Gaspésie population and Boreal population, in Canada. Committee on the Status of Endangered Wildlife in Canada. Ottawa. xxiii + 128 pp.</p>
Supporting Documentation	None

Response to ECCC 34

Comment ID:	ECCC 34
Department:	Environment and Climate Change Canada
Branch/ Division:	
EIS Guidelines Reference (Where provided):	ECCC-32 7.2 Plans, Environmental Effects Monitoring Programs (EEMPs), Species at Risk Impacts Mitigation and Monitoring Program
Reviewer’s Comment:	15.0 Other Wildlife, Section 15.4 Table 15.20 “Mitigation Measures: Other Wildlife”, ID#335 (p.182 of pdf) related to Caribou, it is stated that “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 Mitigation and Monitoring Plan”, however there is no reference to these plans anywhere in the documentation provided for review. ECCC also notes that there are no mitigations measures identified during Operation and Decommissioning Phases. See above ECCC recommendations related to caribou.
Response:	WEGH2 is committed to mitigating potential effects on wildlife during Project construction and operation. Mitigation and monitoring protocols for wildlife, including caribou, will be included in the Environmental Protection Plan(s) which will incorporate mitigation measures and monitoring commitments in the EIS and this EIS Amendment. They will be developed in consultation with applicable regulators and will be submitted for review prior to Project construction. The plan(s) will reflect applicable conditions of release from the environmental assessment process and will include information on how and when updates will be made. WEGH2 is committed to an adaptive management approach, and as such, the Environmental Management Plans will be considered “living” documents that will be updated as applicable to capture Project design updates and results of ongoing environmental monitoring.
Supporting Documentation	None

Response to ECCC 35

Comment ID:	ECCC 35
Department:	Environment and Climate Change Canada
Branch/ Division:	
EIS Guidelines Reference (Where provided):	ECCC-33 7.0 Environmental Protection – Mitigation and Plans
Reviewer’s Comment:	<p>15.0 Other Wildlife, Section 15.4 Table 15.20 “Mitigation Measures: Other Wildlife”, ID#338 (p. 182 of pdf) related to Newfoundland marten (listed as Threatened on Schedule 1 of SARA), ECCC notes that “Dens/nest/lodges of Newfoundland marten identified prior to construction will be flagged and appropriate buffers will be maintained around these features”.</p> <p>ECCC recommends referencing pre-construction monitoring methodologies, and including recommended buffers in the mitigation measures.</p> <p>Our comments related to Newfoundland marten are based on available ECCC expertise, but we recognize that in this area the technical expertise and authority lies with the province including methods for assessing biophysical attributes of critical habitat and recommended mitigation measures (e.g., buffers).</p>
Response:	<p>WEGH2 is committed to mitigating potential effects on wildlife during Project construction and operation. Mitigation and monitoring protocols for wildlife, including marten, will be included in the Environmental Protection Plan(s) which will incorporate mitigation measures and monitoring commitments in the EIS and this EIS Amendment. The approach to monitoring marten will be developed in consultation with applicable regulators and will be submitted for review prior to Project construction, and WEGH2 will work with regulators to confirm appropriate buffers for marten dens. The plan(s) will reflect applicable conditions of release from the environmental assessment process and will include information on how and when updates will be made. WEGH2 is committed to an adaptive management approach, and as such, the Environmental Management Plans will be considered “living” documents that will be updated as applicable to capture Project design updates and results of ongoing environmental monitoring.</p>
Supporting Documentation	None

Response to ECCC 36

Comment ID:	ECCC 36
Department:	Environment and Climate Change Canada
Branch/ Division:	
EIS Guidelines Reference (Where provided):	ECCC-34 6.4 Cumulative Environmental Effects d) describe the mitigation measures and determine the significance of the residual cumulative effects and 8.0 Residual Effects and Determination of Significance
Reviewer’s Comment:	15.0 Other Wildlife, Section 15.5 “Residual Environmental Effects”, Table 15.22 “Summary of Effects by Project Component During Construction” (p.187 of pdf). ECCC notes that the summary does not include a description of residual effects on caribou, such as habitat fragmentation and habitat avoidance/displacement (i.e., avoidance of linear features such as proposed transmission lines in known caribou wintering area) which is “particularly important” to consider for caribou, as noted in section 15.5.1.1 “Vegetation Clearing and Edge Effects”. ECCC recommends effects of habitat fragmentation and displacement/avoidance be included in the summary of Residual Effects and include a discussion of mitigation measures to avoid/minimize residual effects, and include a monitoring plan to assess residual effects, and an offsetting plan.
Response:	Noted. Please consider the summary of effects presented in Table 15.22 of the Environmental Impact Statement (EIS) revised to include the following: “The creation of linear features and other areas of development can also have negative effects on species such as caribou, through sensory disturbance and avoidance behaviours”. Additional discussion of indirect effects from a change in habitat and caribou displacement and/or avoidance behaviours is provided below, as well as commitments to mitigation and monitoring for caribou under the Species at Risk (SAR) Impacts Mitigation and Monitoring Plan (IMMP). <u>Caribou Displacement / Avoidance</u> Caribou are known to avoid linear features such as transmission lines and roads. Research has demonstrated avoidance distances of 1.75 km to 8 km for ungulates (Dyer et al. 2001; Plante et al. 2018; Vistnes and Nellemann 2001), although some studies found no avoidance (Reimers et al. 2007; Plante et al. 2018), or avoidance only during construction (Eftestøl et al. 2016). The mechanisms that cause caribou to avoid anthropogenic disturbances may include visual and other sensory disturbances such as noise and dust (Boulanger et al. 2012, 2021), with variable responses including a shift in individual home ranges (e.g., MacNearney et al. 2016), seasonal avoidance (e.g., Boulanger et al. 2012), alteration of behaviours and group sizes near the disturbance (e.g., Weir et al. 2007), and a change in the timing and direction of migration (e.g., Mahoney and Schaefer 2002). A shift in caribou distribution from a previously used area can have implications on caribou health and mortality risk if caribou relocate to areas of less suitable habitat. As indicated in the response to ECCC 30, caribou are only expected to occur in an area near north of Stephenville Crossing and near the proposed transmission line. Given that the transmission line parallels an existing linear feature in this area, residual effects of the Project on caribou displacement / avoidance are expected to be limited.

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	<p><u>Commitment to Monitoring and Mitigation</u></p> <p>WEGH2 is committed to mitigating potential effects on wildlife during Project construction and operation. Mitigation and monitoring protocols for wildlife, including caribou, will be included in the Environmental Protection Plan(s) which will incorporate mitigation measures and monitoring commitments in the EIS and this EIS Amendment. They will be developed in consultation with applicable regulators and will be submitted for review prior to Project construction. The plan(s) will reflect applicable conditions of release from the environmental assessment process and will include information on how and when updates will be made. WEGH2 is committed to an adaptive management approach, and as such, the Environmental Management Plans will be considered “living” documents that will be updated as applicable to capture Project design updates and results of ongoing environmental monitoring.</p> <p>References:</p> <p>Boulanger, J., K.G. Poole, A. Gunn and J. Wierzchowski. 2012. Estimating the zone of influence of industrial development on wildlife: a migratory caribou Rangifer tarandus groenlandicus and diamond mine case study. <i>Wildlife Biology</i> 18: 164-179.</p> <p>Boulanger, J., Poole, K.G., Gunn, A., Adamczewski, J. and J. Wierzchowski. 2021. Estimation of trends in zone of influence of mine sites on baren-ground caribou populations in the Northwest Territories, Canada, using new methods. <i>Wildlife Biology</i>, 2021(1). Available online at: https://doi.org/10.2981/wlb.00719 Last accessed March 2, 2021.</p> <p>Dyer, S.J., J.P. O'Neill, S.M. Wasel and S. Boutin. 2001. Avoidance of Industrial Development by Woodland Caribou. <i>Journal of Wildlife Management</i> 65: 531-542.</p> <p>Eftestøl, S., K. Flydal, D. Tsegaya and J.E. Colman. 2019. Mining activity disturbs habitat use of reindeer in Finnmark, Northern Norway. <i>Polar Biology</i> 42: 1849-1858.</p> <p>MacNearney, D., K. Pigeon, G. Stenhouse, W. Nijland, N.C. Coops and L. Finnegan. 2016. Heading for the hills? Evaluating spatial distribution of woodland caribou in response to a growing anthropogenic disturbance footprint. <i>Ecology and Evolution</i> 6: 6484-6509.</p> <p>Mahoney, S.P. and J.A. Schaefer. 2002. Hydroelectric Development and the Disruption of Migration in Caribou. <i>Biological Conservation</i> 107: 147-153.</p> <p>Plante, S., C. Dussault, J.H. Richard and S.D. Côté. 2018. Human disturbance effects and cumulative habitat loss in endangered migratory caribou. <i>Biological Conservation</i> 224: 129-143.</p> <p>Reimers, E., B. Dahle, S. Eftestøl, J.E. Colman and E. Gaare. 2007. Effects of a power line on migration and range use of wild reindeer. <i>Biological Conservation</i> 134: 484-494.</p> <p>Vistnes, I. and C. Nellemann. 2001. Avoidance of cabins, roads, and power lines by reindeer during calving. <i>Journal of Wildlife Management</i> 65: 915-925.</p> <p>Weir, J.N., S.P. Mahoney, B. McLaren and S.H. Ferguson. 2007. Effects of mine development on Woodland Caribou Rangifer tarandus distribution. <i>Wildlife Biology</i> 13: 66-74.</p>

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Comment ID:	ECCC 36
Supporting Documentation	None

Response to ECCC 37

Comment ID:	ECCC 37
Department:	Environment and Climate Change Canada
Branch/ Division:	
EIS Guidelines Reference (Where provided):	ECCC-35 6.2 Predicted Environmental Effects of the Undertaking e) i. direct and indirect effects of Project construction, operation decommissioning and rehabilitation
Reviewer's Comment:	15.5.3.2 "Summary of Predicted Environmental Effects" (p. 199 of pdf), ECCC recommends that indirect effects due to habitat fragmentation and displacement/avoidance be further described for caribou; the Project may displace caribou out of their wintering area near Stephenville in order to avoid transmission line and ECCC notes that uncertainty remains regarding the indirect effects of the Project on this subpopulation.
Response:	See response to comment ECCC 36.
Supporting Documentation	None

Response to ECCC 38

Comment ID:	ECCC 38
Department:	Environment and Climate Change Canada
Branch/ Division:	
EIS Guidelines Reference (Where provided):	ECCC-36 2.1 Study Area, iv. Habitat of federally or provincially listed species at risk, including critical habitat for the designated species and other sensitive areas And 4.2.3 Terrestrial Environment c) Species at risk and of conservation concern and their habitats, including designated critical habitat
Reviewer's Comment:	16.0 Areas of Conservation Concern, section 16.2.2 "Existing Environment for Terrestrial AoCC", Table 16.4 "Private Nature Reserves in the LAA / RAA" (p 228 of pdf), ECCC notes that Sandy Point also contains Piping Plover Critical Habitat.
Response:	Noted. Thank you.
Supporting Documentation	None

Response to ECCC 39

Comment ID:	ECCC 39
Department:	Environment and Climate Change Canada
Branch/ Division:	
EIS Guidelines Reference (Where provided):	ECCC-37 2.1 Study Area, iv. Habitat of federally or provincially listed species at risk, including critical habitat for the designated species and other
Reviewer’s Comment:	16.0 Areas of Conservation Concern, section 16.2.2 “Existing Environment for Terrestrial AoCC”, Proposed Critical Habitat (p. 229 of pdf), it is stated “There are no designated critical habitat areas within or intersecting the AoCC LAA/RAA”. This statement is incorrect, there are multiple areas with designated Piping Plover Critical Habitat within RAA (list can be made available upon request).
Response:	WEGH2 noted in Section 16.2.2 of the Environmental Impact Statement (EIS) that “ECCC data indicate critical habitat for piping plover occurs at 13 points within the terrestrial and marine LAA / RAAs (Government of Canada 2023d).” WEGH2 incorrectly identified these critical habitat areas as proposed instead of designated. If there are additional critical habitat sites, WEGH2 would appreciate receiving location data from Environment and Climate Change Canada. Reference: Government of Canada 2023. Species at Risk Act. Public Registry. Available at: https://www.canada.ca/en/environment-climate-change/services/environmental-enforcement/acts-regulations/about-species-at-risk-act.html . Accessed May 2023.
Supporting Documentation	None

Response to ECCC 40

Comment ID:	ECCC 40
Department:	Environment and Climate Change Canada
Branch/ Division:	
EIS Guidelines Reference (Where provided):	ECCC-38 6.2 Predicted Environmental Effects of the Undertaking e) Flora and Fauna
Reviewer’s Comment:	<p>Appendix BSA-3 Terrestrial Environment Baseline Study, 4.3.3.1 “Atlantic Flyway” (p. 80 of pdf), ECCC agrees with the Proponents statement “There are many concentration points within or near the LAA that are bottlenecks for migrating birds, or places to congregate and stage before or after a long trans-oceanic flight”.</p> <p>However, ECCC notes that the EIS Avifauna section 13.6 “Determination of Significance” (p. 85 of the pdf) states “Increase in avifauna mortality is predicted to be low in magnitude because there are no concentrations of birds (e.g., colonies, migration bottlenecks) close to proposed wind turbines”.</p> <p>Given the importance of the LAA/RAA to migratory birds, ECCC strongly recommends clarifying EA predictions based on information available through desktop studies supported by baseline surveys / studies and scientific literature.</p>
Response:	<p>There are concentration points and migration bottlenecks within the Regional Assessment Area and Local Assessment Area but these concentrations of migrating birds at coastal colonies and migration bottlenecks are far from proposed turbine sites. Furthermore, baseline data, local knowledge of bird distribution, geography, and distribution of habitat suggests that most birds will follow coastlines.</p> <p>Data collected during baseline surveys in 2023 including migration surveys will be summarized and results will be incorporated into development of mitigation in the Avifauna Impacts, Mitigation and Monitoring Plan.</p>
Supporting Documentation	None

Response to ECCC 41

Comment ID:	ECCC 41
Department:	Environment and Climate Change Canada
Branch/ Division:	
EIS Guidelines Reference (Where provided):	ECCC-39 4.3 Baseline Studies 4.3.3 Terrestrial Environment
Reviewer’s Comment:	<p>(a) Appendix BSA-3 Terrestrial Environment Baseline Study, 4.3.3.1 “Atlantic Flyway” (p.80 of pdf) describes how important St. George’s Bay is for wintering waterfowl (like Common Goldeneye) and staging shorebirds. Information outlining the importance of the LAA/RAA for migratory birds is outlined in information presented throughout the report. However, discussions regarding the risks of building very large windfarms with 200m turbines at high elevation sites on a peninsula along a major flyway migration corridor appears to be lacking in the EIS’ section 13.6 Determination of Significance.</p> <p>(b) ECCC notes that many migratory bird migrants follow coastlines to help with navigation and they will likely be funneled over the wind farm at Port-au-Port Peninsula. Birds flying at 500 m above sea level arriving at the Port-au-Port Peninsula with areas above 300 m elevation with the addition of turbines 200 m in height could result in mortality events during migration and periods of low visibility (e.g., fog).</p> <p>(c) ECCC recommends referring to Table 1. Site Sensitivity (p. 17) of the CWS EA Guidance Document: Wind turbines and birds – A Guidance Document for Environmental Assessment (ECCC, 2007a); for the Port-au-Port Wind Farm, ECCC notes that nearly all of the bullets for “very high” sensitivity determining factors are met.</p> <p>As previously discussed in early phases of the EA, ECCC recommends referring to ECCC 2007 and 2022 Wind Energy and Birds EA Guidance Update for advice regarding baseline and additional recommended studies.</p> <p>ECCC notes that only winter and spring 2023 aerial and field surveys initial results were available in time for the EIS, and the EIS does not include baseline monitoring surveys and radar and acoustic studies recommended for very high sensitivity sites (ECCC 2007, 2022).</p> <p>ECCC notes that given that the project is registered under Newfoundland and Labrador’s Environmental Protection Act Environmental Assessment Regulations, it remains the discretion of the Province of NL whether sufficient information has been provided to assess the potential impacts of the Project.</p>
Response:	<p>(a) WEGH2 recognizes the importance of the area for wintering and migrating birds. Studies completed in 2023 (see below) were designed to collect information of movement patterns and flight paths of birds within the Port au Port area. Risk of mortality to waterbirds, shorebirds, and waterfowl are discussed in Section 13.5.2.2 Operation and Maintenance of the Environmental Impact Statement (EIS). Effects were predicted to be low in magnitude based on the geography of the area and distribution of habitats (e.g., lack of inland marshes and ponds). Survey data from 2023 will provide further information on movement patterns of bird, results of which will be incorporated in the Avifauna Impact Mitigations and Monitoring Plan (IMMP).</p>

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	<p>(b) WEGH2 acknowledges that birds likely follow the coastlines during migration, which means that birds will either follow the Port au Port peninsula, or more likely reach Stephenville and then continue to follow the coast north from that point. Wind turbines are sited away from the coast, thereby lowering the likelihood of collisions. It is understood that during periods of inclement weather, birds may get pushed off course, which may cause them to interact with wind turbines and associated infrastructure.</p> <p>(c) WEGH2 acknowledges that the Project meets many of the criteria for "very high" site sensitivity, and has planned studies accordingly. Surveys completed in 2023 included:</p> <ul style="list-style-type: none"> • Aerial Surveys for wintering waterbirds • Aerial Surveys for Harlequin Duck and Purple Sandpiper • Land based Coastal Waterbird Survey • Wintering/Resident Landbird Survey • Spring and Fall Shorebird Survey • Spring and Fall Migration/Flight Path Survey • Fall Waterfowl Surveys • Nocturnal Owl Breeding Survey • Short-eared Owl Breeding Survey • Breeding Marshbird Monitoring Survey • Breeding Gull/Tern Survey • Inland Breeding Waterfowl Survey • Bank Swallow Breeding Survey • Seabird Colony Survey • Breeding Bird Survey Point Counts • Deployment of Autonomous Recording Units (ARUs) <p>Surveys planned for 2024 include:</p> <ul style="list-style-type: none"> • Radar studies combined with acoustic surveys • Year 2 of avifauna surveys in Port au Port • Year 1 of avifauna surveys in Codroy <p>WEGH2 is committed to completing the analysis and reporting on Project-specific data that were collected in 2023, and continuing with data collection in 2024 and beyond as part of a mitigation and monitoring plan. These site-specific reports/data will be provided to regulators prior to Project construction at each site, either as a standalone submission or as part of developing the required mitigation and monitoring plans (e.g., Avifauna IMMP, SAR IMMP). WEGH2 will work with Newfoundland and Labrador Department of Fisheries, Forestry and Agriculture - Wildlife Division and Environment and Climate Change Canada - Canadian Wildlife Service to determine the appropriate format and timing for providing reports/data.</p>
Supporting Documentation	None

Response to ECCC 42

Comment ID:	ECCC 42
Department:	Environment and Climate Change Canada
Branch/ Division:	
EIS Guidelines Reference (Where provided):	ECCC-40 4.3 Baseline Studies 4.3.3 Terrestrial Environment a) Species at Risk and Relevant Habitat
Reviewer’s Comment:	Appendix BSA-3 Terrestrial Environment Baseline Study 6.2.2 p 139: ECCC notes that there are no Baseline surveys for American Marten (SARA listed Threatened). Our comments on Newfoundland marten are based on available ECCC expertise, but we recognize that in this area the technical expertise and authority lies with the province.
Response:	The Environmental Impact Statement (EIS) Guidelines (Section 4.3.3) and subsequent consultation with Newfoundland and Labrador Department of Fisheries, Forestry and Agriculture (NLDDFA) - Wildlife Division identified that field surveys for moose (<i>Alces alces</i>), caribou (<i>Rangifer tarandus</i>), muskrat (<i>Ondatra zibethicus</i>), and arctic hare (<i>Lepus arcticus bangsii</i>) were required prior to Project construction to inform the description of existing (baseline) conditions. For marten (<i>Martes americana</i>), a desktop habitat assessment was completed to assess habitat quality for marten within the Project Area, Local Assessment Area (LAA) and Regional Assessment Area (RAA). The habitat suitability assessment identified the potential for the Project Area, LAA, and RAA to support marten and was used to assess potential Project-related effects on marten. The potential for marten to occur was also informed by the latest status report and recovery plan for Newfoundland marten (COSEWIC 2022; Environment Canada 2013) and Atlantic Canada Conservation Data Centre (AC CDC) records (AC CDC 2023). References: AC CDC (Atlantic Canada Conservation Data Centre). 2023. GH2 Project SAR (Species At Risk) and SOCC (Species of Conservation Concern) Data from AC CDC [Shapefile]. Data request March 2, 2023. COSEWIC (Committee on the Status of Endangered Wildlife in Canada). 2022. COSEWIC assessment and status report on the American marten (Newfoundland population) <i>Martes americana atrata</i> in Canada. Committee on the Status of Endangered Wildlife in Canada. Ottawa. xii + 42 pp. Environment Canada. 2013. Recovery Strategy for the American Marten (<i>Martes americana atrata</i>), Newfoundland population, in Canada. Species at Risk Act Recovery Strategy Series. Environment Canada, Ottawa. xi pp. + appendix.
Supporting Documentation	None

Response to ECCC 43

Comment ID:	ECCC 43
Department:	Environment and Climate Change Canada
Branch/ Division:	
EIS Guidelines Reference (Where provided):	ECCC-41 4.3 Baseline Studies 4.3.3 Terrestrial Environment a) Species at Risk and Relevant Habitat Other Wildlife Guideline EIS
Reviewer’s Comment:	<p>14.0 Bats (page 101 of pdf), and Appendix BSA-3 Terrestrial Environment Baseline Study</p> <p>ECCC is able to provide comments regarding the federal recovery strategy, including threats to the species.</p> <p>ECCC notes that Little Brown Myotis Spp. (SARA listed Endangered), Northern Myotis (SARA listed Endangered), Hoary Bat (COSEWIC listed Endangered – 2023-05); Silver-haired Bat (COSEWIC listed Endangered – 2023-5) and Eastern Red Bat (COSEWIC listed endangered – 2023-05) have the potential to occur in the LAA and be impacted by the construction and operation during the Lifetime of the Project.</p> <p>(a) ECCC recommends changing the terminology of referring to Little Brown Myotis and Northern Myotis as “non-migratory”. The SARA-listed bats are cave-dwelling species that exhibit radiative migration (vs. latitudinal) and can travel long-distances (100 kilometers) between overwintering and summering areas. The understanding of their migration will have implications for optimal sightings of turbines.</p> <p>Section 14.5.2.2 of the EIS, states “The number of resident bat species in the Project Area is low, because of the population declines from white-nose syndrome. As such, it is expected that mortality of resident species at the wind farms will be low. In addition, adaptive management measures during the active bat season is expected to reduce bat fatalities. It is not anticipated that wind farm related mortalities will hinder the recovery of resident bats from white-nose syndrome in Newfoundland.”</p> <p>ECCC is of the view that any additive mortality of SARA listed bat species in White-nose Syndrome (WNS) affected areas, including mortality at wind turbines, has the potential to be biologically-important. The mortality of even a small number of remaining individuals, particularly breeding adults, or disturbance to maternity roosts or hibernacula, has the potential to negatively impact the survival of local populations, their recovery, and potentially, the development of resistance to the fungus that causes WNS.</p> <p>(b) ECCC recommends bat species at risk monitoring equivalent in detail and effort to the bird monitoring (i.e., covering all seasons of activity from spring emergence to pre-hibernation/swarming – April to October) for two years pre-construction.</p> <p>Hibernating bats are known to travel several hundreds of kilometres between overwintering and breeding locations. The assessment should consider bat migration routes and an inventory of important/high value habitat and geographic features, including landforms that might influence movement/congregation, mature trees with cavities for roosting, buildings that might be housing Little</p>

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	<p>Brown Myotis maternity colonies, old mines/caves that may be used as hibernacula, etc. in vicinity of the proposed project.</p> <p>ECCC is not aware of nearby hibernacula, however, the LAA area is limestone and the potential for caves exists as indicated in the EIS.</p> <p>In optimizing the sightings of turbines, ECCC recommends conducting both a passive and targeted acoustic monitoring that will give better coverage of the Project Area and confirm/validate maternity roosts, swarming and/or hibernacula, following a targeted habitat assessment; ECCC recommends the Ontario Ministry of Natural Resources and Forestry “Survey Protocol for Species at Risk Bats in Treed Habitats Little Brown Myotis, Northern Myotis and Tri-Colored Bat” (OMNRF, 2017) protocols to identify potential maternity roost habitat in this area, and for activities that involve clearing trees/forest. This protocol requires that a survey of the area be conducted by a qualified biologist for the presence of potential maternity roost habitat (Phase I and II, OMNRF Protocol, 2017), followed by acoustic surveys of potential roost trees (Phase III, OMNRF, 2017).</p> <p>Given the size of the Project Area, it is expected that a higher number of passive acoustic recording units be deployed and some should be elevated to capture the turbine blade sweep area. Note: bat acoustic recorders have a limited range.</p>
Response:	<p>(a) WEGH2 agrees that little brown myotis and northern myotis should not be referred to as non-migratory, and should instead be referred to as resident species.</p> <p>(b) In 2023, acoustic bat monitoring was conducted at Port au Port Peninsula and in the Stephenville area. A before-after control-impact (BACI) study design was used, meaning that control sites were surveyed outside of the Local Assessment Area (LAA). Surveys will be repeated post-construction to gain a better understanding of impacts. A total of 22 autonomous recording units (ARUs; Wildlife Acoustic SM4BAT-FS) were deployed in 2023. Most were deployed in June or July, and retrieved in November. WEGH2 is aware that the spring migration period was not captured in the 2023 surveys, and plans to capture that period in 2024. A variety of habitats were sampled, including wetland, watercourses / waterbodies, mature forest, scrub and barrens. Forestry data was used to target areas with older, taller trees; areas that may contain maternity roosts.</p> <p>Three ARUs were deployed at-height in the available MET towers. The remaining ARUs were deployed on telescoping poles. One ARU was deployed at a cave entrance that was discovered during field surveys in September.</p> <p>Bat acoustic surveys are planned for the Codroy Wind Farm area in 2024, and will occur at a similar level of effort as the 2023 surveys.</p> <p>WEGH2 is committed to completing the analysis and reporting on Project-specific data that was collected in 2023, and continuing with data collection in 2024 and beyond as part of a mitigation and monitoring plan. These site-specific reports / data will be provided to regulators prior to Project construction at that site, either as a standalone submission or as part of developing the required mitigation and monitoring plans (e.g., SAR IMMP). WEGH2 will work with NLDFAA – Wildlife Division to determine the appropriate format and timing for providing reports / data.</p>
Supporting Documentation	None

Response to ECCC 44

Comment ID:	ECCC 44
Department:	Environment and Climate Change Canada
Branch/ Division:	
EIS Guidelines Reference (Where provided):	ECCC-42 7.0 Environmental Protection – Mitigation and Plans, 7.2.8.1 Species at Risk Impacts Mitigation and Monitoring
Reviewer’s Comment:	<p>14.0 Bats, Table 14.5 Mitigation Measures: Bats (p. 2 of pdf), it is stated that, “Trees will be cut close to ground level, and only large tree stumps will be removed, where practicable”.</p> <p>(a) ECCC recommends avoiding disturbing habitats with characteristics of bat maternity roost until surveys can confirm use of potential maternity trees by bats. If tree/forest clearing must proceed prior to assessing/confirming bat maternity roost occupancy, ECCC CWS recommends that a 100 m minimum buffer around each tree(s) with suitable maternity roost habitat characteristics (identified in Phase I and II survey of the OMNRF 2017 Protocol) be established in order to maintain the integrity of the roost and its microclimate/thermal properties. Bats exhibit roost-switching behaviour and use multiple trees within a maternity roosting area at any given time during the breeding season.</p> <p>Tree/forest clearing should be conducted outside the bat breeding season, which is similar to the migratory bird breeding season. ECCC recommends a habitat assessment followed by additional acoustic surveys during the breeding period, if appropriate maternity roosting habitat is present (following the OMNRF 2017 protocol), and if there will be clearing of forested areas or removal of trees.</p> <p>However, ECCC notes that avoiding the bat breeding season (as suggested in section 6.6.3) does not provide mitigation in the case of the presence of a maternity roost, which should be protected until there is documented evidence that the site has been unoccupied for two consecutive years.</p> <p>ECCC reiterates that site selection is the most important component of a successful mitigation strategy for wind power development with turbines located as far from important bat features as possible.</p> <p>(b) Other than site selection, ECCC notes that in Table 14.5 of the EIS it states, “An adaptive management framework will be used to introduce new mitigation measures if high fatality rates are observed.”</p> <p>ECCC recommends that the Proponent provide project-specific details regarding its Adaptive Management Plan, including defining the basic elements (i.e., goals, targets, performance measures) of its plan, as part of the EIS.</p> <p>(c) ECCC recommends identifying what is considered a “high fatality rate” for bat SAR listed as Endangered and triggers for adaptive management.</p> <p>(d) ECCC recommends including reduced cut-in speeds or altering the pitch/feathering the blades, during high-risk collision periods (e.g., during migration or swarming) or when wind velocity is low. Operational mitigation (minimizing blade rotation in periods of high collision risk) is likely to be the most effective way to reduce collisions.</p>

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	(e) ECCC recommends the cumulative effects assessment consider the effects on bats with the impacts on bats from Cape Ray Gold Mine Project, Valentine Gold Mind Project, and Robinson River Salt Mine Project.
Response:	<p>(a) WEGH2 acknowledges the recommendations for mitigation regarding potential maternity roost trees. WEGH2 is committed to the following mitigation measures:</p> <ul style="list-style-type: none"> • If tree removal cannot be avoided during the bat active season, large diameter trees (>25 cm Diameter at Breast Height) must be inspected for bat use visually and through emergence counts prior to their removal. • Any bat exclusions occurring between May 1 and Aug 31 require a permit under the <i>Newfoundland and Labrador Endangered Species Act</i> and provincial Best Management Practices. <p>(b) The adaptive management plan will be provided as a part of the Species at Risk Impacts Mitigation and Monitoring Plan (SAR IMMP). A table of contents for the SAR IMMP is provided in Appendix 2-1 of this Environmental Impact Statement (EIS) Amendment. Post-construction bat monitoring will occur, including acoustic monitoring and fatality surveys, to determine the need for further management or mitigation.</p> <p>(c) The definition of a 'high fatality rate' cannot be determined at this time. Population estimates of bats in Newfoundland and Labrador (NL) are not known, and there are no other wind projects in the province to base this information on. The determination of what fatality rate triggers adaptive management will be made in consultation with the Newfoundland and Labrador Department of Fisheries, Forestry, and Agriculture (NLDFAA) - Wildlife Division. In other provinces where thresholds for mitigation exist (BC, Alberta, Saskatchewan and Ontario), they are determined by the provincial regulators. Trigger thresholds for adaptive management in those provinces are:</p> <ul style="list-style-type: none"> • BC: ≥ 10 carcasses at any 1 turbine in 1 year, ≥ 7 bats/turbine/year fatality estimate, > 350 fatality estimate for 1 year, or fatality of any bat species at risk (CWEA 2018) • Alberta: > 8 migratory bats/turbine/year, or >500 site fatality estimate for 1 year (CWEA 2018) • Saskatchewan: >4 non-listed bats/megawatt annually, or any mortality of a SAR, or species ranked as S1 or S2 (Saskatchewan Ministry of Environment 2018) • Ontario: 10 bats/turbine/year (CWEA 2018) <p>It is likely that the threshold will be lower in NL, since the population of bats is lower than in many other provinces (particularly with regards to long-distance migrants), and thus mortalities have a relatively larger impact on the overall population.</p> <p>(d) WEGH2 understands Newfoundland and Labrador Department of Fisheries, Forestry, and Agriculture (NLDFAA) - Wildlife Division is developing mitigation guidelines for bats, which we anticipate will be applied to this project.</p> <p>(e) The Cape Ray Gold Mine Project, Valentine Gold Mind Project, and Robinson River Salt Mine Project were considered in the Cumulative Effects Assessment. With respect to bats, the cumulative effects to consider are mortality risk and change in habitat availability. Mining projects are generally not expected to cause mortality for bats, with the exception of infrequent accidental events (e.g., through</p>

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	<p>a bat collision with project infrastructure or a vehicle). As such, cumulative effects regarding bat mortality risks are not expected.</p> <p>The three mining projects will likely result in the loss of some suitable habitat for bats. However, due to the distance of the mining projects, and the high availability of suitable habitat in western Newfoundland, it is anticipated that this Project will have low contribution to the cumulative effects of habitat loss.</p> <p>References:</p> <p>CWEA [Canadian Wind Energy Association], Wind energy and bat conservation– A review by the Canadian Wind Energy Association. 2018. DNVGL. Hovik, Norway. 253 pp.</p> <p>Saskatchewan Ministry of Environment. 2018. Adaptive Management Guidelines for Saskatchewan Wind Energy Projects. Saskatchewan Ministry of Environment, 3211 Albert Street, Regina, Saskatchewan.</p>
Supporting Documentation	Appendix 2-I Species at Risk Impacts Mitigation and Monitoring Plan Table of Contents

Response to ECCC 45

Comment ID:	ECCC 45
Department:	Environment and Climate Change Canada
Branch/ Division:	
EIS Guidelines Reference (Where provided):	ECCC-43 7.0 Environmental Protection – Mitigation and Plans, 7.2.8.1 Species at Risk Impacts Mitigation and Monitoring
Reviewer's Comment:	<p>15.0 Other Wildlife, Table 15.20 Mitigation Measures: Other Wildlife, ID#339/340, Our comments on Yellow-banded Bumble Bee are based on available ECCC expertise, but we recognize that in this area the technical expertise and authority lies with the province.</p> <p>ECCC notes that there is no reference to surveying for Yellow-banded Bumble Bee in baseline surveys. Given their presence in the area, it would be prudent to assume their presence in the project area.</p> <p>ECCC notes that it should be clarified that Bumble Bees do not construct "hives", instead, they typically nest underground or in other hidden locations.</p> <p>This behavior can make them challenging to locate during surveys. It might be beneficial to include this clarification for a better understanding.</p> <p>ECCC recommends including avoidance buffers in the mitigation measures.</p> <p>ECCC notes that the EIS mentions habitat loss as a primary concern. ECCC recommends the (re)creation or restoration of floral habitat using similar or native floral resources. Of note, clearing activities may create new habitat for the species, particularly along road-sides, if mowing is properly timed and not excessive.</p> <p>ECCC recommends that the use of herbicides be carefully considered, as they can reduce floral resources and potentially have sub-lethal effects on bees (Refer to Pollution threat #9.3 of the species' Management Plan).</p>

Comment ID:	ECCC 45
Response:	<p>The Environmental Impact Statement (EIS) Guidelines (Section 4.3.3) and subsequent consultation with Newfoundland and Labrador Department of Fisheries, Forestry and Agriculture (NLDDFA) - Wildlife Division identified that field surveys for moose (<i>Alces alces</i>), caribou (<i>Rangifer tarandus</i>), muskrat (<i>Ondatra zibethicus</i>), and arctic hare (<i>Lepus arcticus bangsii</i>) were required prior to Project construction to inform the description of existing (baseline) conditions. For yellow-banded bumble bee (YBBB; <i>Bombus terricola</i>), a desktop habitat assessment was completed to assess habitat quality for YBBB within the Project Area, Local Assessment Area (LAA) and Regional Assessment Area (RAA). The habitat suitability assessment identified the potential for the Project Area, LAA, and RAA to support YBBB and was used to assess potential Project-related effects on YBBB. The potential for YBBB to occur was also informed by the YBBB status report YBBB management plan, and existing Atlantic Canada Conservation Data Centre (AC CDC) and iNaturalist records (AC CDC 2023; COSEWIC 2015; ECCC 2022; iNaturalist 2023). Based on the desktop analyses, YBBB was confirmed in the LAA near Stephenville and is assumed likely to occur in suitable habitat in other areas of the Project.</p> <p>WEGH2 is committed to developing site-specific mitigation and monitoring plans, including the Species at Risk (SAR) Impacts Mitigation and Monitoring Plan (IMMP). The plan will incorporate mitigation measures and monitoring commitments in the EIS and this EIS Amendment, will reflect applicable conditions of release from the environmental assessment process, and will include information on how and when updates to the plans will be made. The plans will be developed in consultation with applicable regulators and will be submitted for review prior to Project construction at that site. WEGH2 will work with applicable regulatory agencies to confirm appropriate buffers for YBBB nests as well as other potential mitigation measures (e.g., measures related to vegetation management). The SAR-IMMP will include clarification that YBBB do not construct hives but rather use underground / hidden nests.</p> <p>References:</p> <p>AC CDC (Atlantic Canada Conservation Data Centre). 2023. GH2 Project SAR (Species At Risk) and SOCC (Species of Conservation Concern) Data from AC CDC [Shapefile]. Data request March 2, 2023.</p> <p>COSEWIC (Committee on the Status of Endangered Wildlife in Canada). 2015. COSEWIC assessment and status report on the Yellow-banded Bumble Bee <i>Bombus terricola</i> in Canada. Committee on the Status of Endangered Wildlife in Canada. Ottawa. ix + 60 pp.</p> <p>ECCC (Environment and Climate Change Canada). 2022. Management Plan for the Yellow-banded Bumble Bee (<i>Bombus terricola</i>) in Canada [Proposed]. <i>Species at Risk Act</i> Management Plan Series. Environment and Climate Change Canada, Ottawa. iv + 46 pp.</p> <p>iNaturalist. 2023. Yellow-banded Bumble Bee <i>Bombus terricola</i> July 12, 2021 observation by user dbmcc09. Available online: https://www.inaturalist.org/observations/88100504 (last accessed July 14, 2023).</p>
Supporting Documentation	None

Response to ECCC 46

Comment ID:	ECCC 46
Department:	Environment and Climate Change Canada
Branch/ Division:	
EIS Guidelines Reference (Where provided):	ECCC-44 7.0 Environmental Protection – Mitigation and Plans, 7.2.8.1 Species at Risk Impacts Mitigation and Monitoring
Reviewer’s Comment:	<p>15.0 Other Wildlife – Lichen SAR</p> <p>Our comments on Lichen SAR are based on available ECCC expertise, but we recognize that in this area the technical expertise and authority lies with the province.</p> <p>ECCC recommends that the project micro-siting should aim to avoid any instances of lichen SAR presence found during baseline and pre- construction surveys within the Project Area. Given that some lichen SAR are sensitive to hydrological conditions and edge effects, establishing suitable buffer zones around these lichens and associated wetlands is recommended.</p> <p>In cases where it is not possible to avoid impacts on lichen SAR, ECCC recommends identifying mitigation measures such as research and translocation of impacted lichens, and monitoring indirect effects to SAR lichen found within buffer zones but not directly impacted.</p>
Response:	<p>As indicated in the Environmental Impact Statement (EIS), WEGH2 is committed to and is in the process of conducting the site-specific environmental field programs identified in the EIS Guidelines and further defined through consultation with regulators prior to Project construction. The results of the Port au Port vegetation surveys are provided in the Land Cover Classification and Rare Plants Technical Data Report – Port au Port Wind Farm (Appendix 2-C).</p> <p>Given the phased approach to construction, baseline data collection to date has focused on the Port au Port Peninsula, since it will be the first wind farm to be constructed. Baseline field data collection is planned in the Codroy Wind Farm area during 2024, along with continued baseline data collection on the Port au Port Peninsula where required. Reports detailing data collection methods, results and additional mitigation measures will be provided to regulators prior to Project construction, either as a standalone submission or as part of developing the required mitigation and monitoring plans (e.g., Species at Risk Impacts Mitigation and Monitoring Plan). WEGH2 will engage Newfoundland and Labrador Department of Fisheries, Forestry and Agriculture (NLDDFA-Wildlife Division) in the development of the required Species at Risk Impacts Mitigation and Monitoring Plans. WEGH2 will discuss micro-siting plans with NLDDFA-Wildlife Division, buffers of observed SAR species and mitigation measures such as translocation of observed SAR lichens and monitoring.</p>
Supporting Documentation	Appendix 2-C, Land Cover Classification and Rare Plants Technical Data Report – Port au Port Wind Farm

Response to ECCC 47

Comment ID:	ECCC 47
Department:	Environment and Climate Change Canada
Branch/ Division:	
EIS Guidelines Reference (Where provided):	<p>ECCC-45</p> <p>2.1 Study Area, ss c) iii wetlands, estuaries, lakes and rivers</p> <p>And</p> <p>4.2. Existing Environment ss. 4.2.2 Aquatic Environment, d) Surface-water and groundwater movement and aquifer recharge zones, and the delineation of drainage basins, including wetlands, at appropriate scales</p> <p>And</p> <p>4.3.2 (a) Aquatic Environment within study area of the hydrogen and ammonia generation facility</p>
Reviewer's Comment:	<p>(a) It is estimated that 2.56 km² of wetlands will be directly impacted by the Project, and 52.30 km² have potential to be indirectly impacted outside the project footprint. The majority of these are classified as peat bogs in this assessment. Scientific literature shows that peat bogs in Newfoundland comprise several meters of organic carbon rich soils which have taken thousands of years to accumulate. ECCC recommends that this point be clearly conveyed with reference to local literature in the assessment (for example, in section 12.2.2.3).</p> <p>(b) Wetland outside the Project Area includes a Ramsar site. Although not proposed to be directly altered, hydrological alteration of the landscape can have important indirect impacts to wetlands located outside of the Project footprint (especially downstream) and may increase the area of wetland alteration. ECCC recommends that a plan be developed to monitor and minimize impacts to the Ramsar site and any other significant wetlands in the RAA.</p> <p>(c) From the information provided, the assessment has primarily (if not solely) relied on remote sensing, satellite imagery and a digital elevation model to map wetlands in the project region. Ground truthing is needed to refine and confirm wetland extent estimates and classifications. The proponent also uses land use inventory data from the NL Department of Fisheries, Forestry and Agriculture (NLDFFA 2018 is used as the in-text citation but is not listed in the reference section) to examine potentially impacted areas. However, this land use inventory does not comprise wetland data.</p> <p>(a) There are peatland inventories and literature where peatlands are identified, classified, described, etc., in the Project RAA which the Proponent should consider and incorporate (see some below) into their regional assessment: Davis, A. (1984). Ombrotrophic peatlands in Newfoundland, Canada: Their origins, development and trans-Atlantic affinities. <i>Chemical Geology</i>, 44, 287-309. Newfoundland and Labrador Geological Survey. "Peatland Inventory - Newfoundland." Newfoundland and Labrador GeoScience Atlas OnLine. Last update: 2022. https://geoatlas.gov.nl.ca . [fill in date downloaded]. Pollett (1968) Peat Resources of Newfoundland. Newfoundland Dep. Mines, Agri., Res., Miner. Resour. Rep., p. 226, St. John's, NFLD</p>

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	<p>Pollett, F.C. and Wells, E.D. (1980). Peatlands of Newfoundland -- an overview. In: F.C. Pollett, A.F. Rayment and A. Robertson (Editors), The Diversity of Peat, Nfld. Lab. Peat Assoc., St. John's, Nfld., pp. 1-16.</p> <p>Wells (1996) Classification of peatland vegetation in Atlantic Canada. Journal of Vegetation Science, 7(6), 847-878</p>
Response:	<p>(a) The local literature referenced in this comment will be incorporated into the discussion on peatlands in Land Cover Classification and Rare Plants Technical Data Report – Port au Port Wind Farm (Appendix 2-C). The Peatland Inventory – Newfoundland database does not load or is not available for the Port au Port Peninsula. Available areas appear to cover some portions of the Project Area in Stephenville Crossing and areas to the south. However, the quality of the pdf images is poor and wetlands are not digitized. This data source will be reviewed but not used directly.</p> <p>(b) WEGH2 has committed to consultation with the Newfoundland and Labrador Natural Areas program to identify mitigations to reduce effects of routing a transmission line through Bras Mort Bog and other wetlands. The Project will not result in a potential effect on surface water quantity or surface water quality. For surface water quantity, Project activities will not result in a potential effect as there is no change to surficial soils, except for roads and turbine pads where vegetation removal (clearing and grubbing) will be limited to these areas. The runoff from the road and turbine pads drain to the surrounding watershed. Therefore, there are no anticipated runoff losses.</p> <p>FracFlow Consultants Inc. (2024) conducted an assessment of changes in hydrologic flows within a sub-watershed in the Codroy Valley (Brooms Brook) due to 23 km of Project roads and 30 turbine pads (Appendix WRM53-A of this EIS Amendment). The land use change was estimated to be 1% of the total Brooms Brook watershed area of 104 km². A hydrologic model (HEC-HMS) was developed for Broom Brook to estimate surface water flows for pre- and post-development conditions. A visual comparison of the Broom Brook pre- and post-development hydrographs and cumulative flow results identified no substantial effects to peak flows in the watershed due to Project roads and turbine pads.</p> <p>The limited extent of tree clearing, grubbing, grading, and surficial soil replacement along with the fact that all wind farm development areas will continue to drain / runoff to existing watersheds support the conclusion that the windfarms will have negligible effects on surface water quantity.</p> <p>Similarly, the Project activities will not result in a potential adverse effect on surface water quality as the grubbing, vegetation removal, and surficial soil replacement are limited to the roads and turbine pad areas. Runoff from these areas will be subject to erosion and sediment controls prior to being released to the local sub-watershed areas.</p> <p>As erosion and sediment control mitigation measures are capable and proven to significantly reduce sediment loads, once implemented, the concentration of TSS will decrease to below baseline conditions.</p> <p>The application of standard mitigation measures and best management practices to reduce erosion and sedimentation, and dust emissions, potential effects are predicted to be negligible.</p> <p>(c) Remote sensing, satellite imagery and a digital elevation modelling is a standard method used to map wetlands in Newfoundland and Labrador environmental assessments. The land use inventory data from the NL</p>

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	Department of Fisheries, Forestry and Agriculture (NLDFFA 2018) that was provided to WEGH2 and used in the assessment includes wetland polygons. Land cover classification (LCC) mapping, including wetland presence, was field evaluated in fall 2023. LCC mapping has been revised following field survey and results are provided in the Land Cover Classification and Rare Plants Technical Data Report – Port au Port Wind Farm (Appendix 2-C).
Supporting Documentation	Appendix 2-C, Land Cover Classification and Rare Plants Technical Data Report – Port au Port Wind Farm. Appendix WRM53-A Flood Risk Analysis for the Codroy Valley

Response to ECCC 48

Comment ID:	ECCC 48
Department:	Environment and Climate Change Canada
Branch/ Division:	
EIS Guidelines Reference (Where provided):	ECCC-46 6.2 Predicted Environmental Effects of the Undertaking, c. Effects of the Project on surface water bodies, wetlands and groundwater aquifers 7.1. Mitigations c) effects to wetlands
Reviewer’s Comment:	(a) ECCC recommends that Section 12.5.3.1 of the EIS include rationale describing why avoidance and minimization of impacts to wetlands are determined to be not possible. The proposed project footprint would directly overlap with 2.56 km ² of wetland, most of which is peatland which are some of the most challenging wetland ecosystems to restore/rehabilitate. (b) If wetlands are altered as a result of this project, mitigation measures to avoid, minimize effects should be outlined, and wetland compensation plan developed for residual effects. The EIS currently does not include rationale for why wetlands cannot be avoided/minimized, and does not include mitigation measures that minimizes residual effects to wetlands (e.g., a wetland compensation plan). (c) There is also an opportunity for impacts to be minimized where wetlands are within the project footprint but will not be fully lost (e.g., collector and transmission lines).

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Response:	<p>The Project’s physical layout of wind turbines and roads has been designed to avoid and reduce impact to wetlands as a primary mitigation.</p> <p>(a) Section 12.5.3.1 (Residual Change in Wetland Function – Construction) in the Environmental Impact Statement (EIS) describes residual effects to wetlands. Mitigation measures, including avoidance and reduction of impacts on wetlands, are described in Section 12.4 of the EIS. Although Project planning has and will continue (through micro-siting) to attempt to reduce direct impacts to wetlands, it will not be possible to completely avoid all wetlands within the Local Assessment Area (LAA) due to the abundance and extent of these areas within western Newfoundland.</p> <p>(b) Mitigation measures proposed to help reduced impacts to wetlands, including within the footprints of collector and transmission lines, are described in the EIS, Chapter 12 (Wetlands and Vegetation, including Rare Plants), Section 12.4 (Mitigation Measures). Mitigation measures for reducing impacts to wetlands include implementation of erosion and sediment control measures, flagging wetlands and appropriate buffers where feasible, use of protective layers such as matting or biodegradable geotextile or other approved materials when crossing wetlands beyond areas to be cleared.</p> <p>As stated in Section IV.7 of the Federal Policy On Wetland Conservation Implementation Guide For Federal Land Managers, “... if federal authorization is required, on either federal or non-federal land, potential environmental effects on wetlands which would result from that authorization to proceed, can only be considered if: i) the affected wetland is on federal land; or, ii) the potential effects are within an area of federal jurisdiction. Otherwise, federal authorities can promote the conservation of wetlands through cooperative, voluntary means ...” As the Project is not known to affect wetlands on federal land, there is no federal funding for the Project, and the Project does not occur in an area of historical wetland loss, the Federal Policy on Wetland Conservation (Government of Canada 1997) does not apply to the Project, and a wetland compensation plan for residual effects is not proposed. WEGH2 has committed to consultation with the Newfoundland and Labrador Natural Areas program to identify mitigations to reduce effects of routing a transmission line through Bras Mort Bog and other wetlands. WEGH2 will also work with Newfoundland and Labrador Department of Fisheries, Forestry and Agriculture (NLDFFA-Wildlife Division) to identify wetlands of greater ecological value for potential avoidance and to identify mitigations to reduce effects from transmission line construction.</p> <p>(c) In Section 12.5.3.1, there is a statement, “Project micro-siting is largely intended to avoid vegetation SAR and SOCC but will also be used to further avoid or reduce interactions with sensitive vegetation community types such as wetlands, when possible.” Project micro-siting will include moving transmission and collector line structures, where possible, (e.g., as the engineering limits of spanning allow).</p>
Supporting Documentation	N/A

Response to ECCC 49

Comment ID:	ECCC 49
Department:	Environment and Climate Change Canada
Branch/ Division:	
EIS Guidelines Reference (Where provided):	ECCC-47 6.2 Predicted Environmental Effects of the Undertaking, h. GHG emissions (related to impacts to wetlands, SEA and FPWC)
Reviewer’s Comment:	<p>The proponent has provided calculations with respect to the new “Draft Technical Guide Related to the Strategic Assessment of Climate Change: Guidance on Quantification of net GHG emissions, impact on carbon sinks, mitigation measures, net-zero plan and upstream assessment”. However, while the proponent examines the impacts to aboveground biomass on greenhouse gas emissions, the proponent does not take into account the losses of soil organic carbon from peatlands despite acknowledgement that soils will be disturbed, organic material removed and wetlands altered.</p> <p>Soil organic carbon comprises the far majority of carbon stocks in peatlands. Furthermore, peatlands are well known significant carbon sinks, they have a net cooling effect on Earth’s climate, and stabilize several meters of soil carbon derived directly from atmospheric carbon. These points should be more clearly and thoroughly discussed as part of the EIS and impacts to wetlands.</p> <p>The proponent states in section 6.7: “The contribution of the annual project construction GHG emissions (direct and indirect) to provincial and federal totals are presented in Table 6-26. These GHG emissions used in these comparisons do not include emissions from land clearing as the provincial and federal reported emissions do not include emissions from land use change (ECCC 2021).” The expectation as per the Strategic Assessment of Climate Change is to consider all potential changes in net greenhouse gas emissions due to project impacts, both quantitatively and qualitatively, within the entire scope of the project. Thus, emissions from land clearing are expected to be accounted for in annual project emissions.</p> <p>Because the project area is >100 ha, the expectation as per the strategic assessment is for site- or region-specific data to be used in calculating project impacts to ecosystem greenhouse gas emissions – these kind data are not incorporated into the assessment. Qualitative discussion on data limitations is also expected.</p>
Response:	<p>The change in carbon sinks from the loss of soil organic carbon from disturbance of wetlands was assessed and were provided in Table 6-25 of the Environmental Impact Statement (EIS), and additional information on these calculations were provided in Appendix 6C of the EIS. The wetlands were conservatively assessed as peatlands.</p> <p>Emissions from land clearing were estimated, as presented in Table 6-25 (for change in carbon sinks) and Table 6-26 (for change in carbon stock) of the EIS. Environment and Climate Change Canada’s (ECCC) 2023 National Inventory Report does not present land use change emissions in the federal and provincial total reported greenhouse gas emissions. Therefore, to make a fair comparison, land use change emissions from the Project have not been included in the comparison against these totals.</p>

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	<p>The noted Strategic Assessment of Climate Change (SACC) draft Technical Guide is required to be applied when conducting federal impact assessments. The Project is not subject to federal impact assessment, and the provincial EIS Guidelines did not reference the SACC draft Technical Guide. Therefore strict adherence to this guide is not a requirement of the Project assessment. However, the carbon sink impact calculations were included for thoroughness of the greenhouse gas assessment and followed the Tier 1 method outlined in the SACC draft Technical Guide (ECCC 2021), and associated IPCC methodologies (IPCC 2006, 2019), as these are the latest methods recommended by ECCC.</p> <p>Site- or region-specific data for usage in the land clearing and carbon sink impact calculations were limited in their availability therefore the best available data were used. The biomass density and age of forests were taken from region specific NRCan forest documents (Canada's Forest Biomass Resources [Penner et al.1997], Canada's Forest Inventory 2001 [Power and Gillis 2001], respectively). Where site- or region-specific data was not available, then IPCC default values were used that were as closely representative of the forests as possible. Conservative values were applied when more than one option was available (e.g., the higher range of biomass densities over the area was applied across the full disturbed area).</p> <p>References</p> <p>ECCC (Environment and Climate Change Canada). 2021. Draft Technical Guide Related to the Strategic Assessment of Climate Change Guidance on quantification of net GHG emissions, impact on carbon sinks, mitigation measures, net-zero plan and upstream GHG assessment. Draft. August 2021. viii + 87 pp. Available at: file:///C:/Users/etracy/Downloads/strategic-assessment-climate-change-draft-technical-guide.pdf</p> <p>IPCC (Intergovernmental Panel on Climate Change). 2006. 2006 IPCC Guidelines for National Greenhouse Gas Inventories. Edited by Simon Eggleston, Leandro Buendia, Kyoko Miwa, Todd Ngara, Kiyoto Tanabe.</p> <p>IPCC (Intergovernmental Panel on Climate Change). 2019. 2019 Refinement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories. Available at: https://www.ipcc.ch/report/2019-refinement-to-the-2006-ipcc-guidelines-for-national-greenhouse-gas-inventories/</p> <p>Penner, M., K. Power, C. Muhairwe, R. Tellier, and Y. Wang. 1997. Canada's Forest Biomass Resources: Deriving Estimates from Canada's Forest Inventory. Information Report BC-X-370. vii + 33 pages. Available at: https://cfs.nrcan.gc.ca/pubwarehouse/pdfs/4775.pdf</p> <p>Power, K. and M. Gillis. 2001. Canada's Forest Inventory 2001. Natural Resources Canada, Canadian Forest Service, Pacific Forestry Centre, Victoria, BC. viii + 128 pp. Available at: https://cfs.nrcan.gc.ca/pubwarehouse/pdfs/26795.pdf</p>
Supporting Documentation	None

Response to ECCC 50

Comment ID:	ECCC 50
Department:	Environment and Climate Change Canada
Branch/ Division:	
EIS Guidelines Reference (Where provided):	ECCC-48 24.0 Accidents and Malfunctions
Reviewer's Comment:	<ul style="list-style-type: none"> • Each of the seven accident / malfunction scenarios outlined in the EIS guidelines were considered or further assessed (when appropriate) in the EIS • Quantity, mechanism, rate, form, and characteristics of materials likely to be released into the environment during accidents and malfunctions was considered <p>The likelihood of occurrence and consequence of severity of accidents and malfunctions was considered for all applicable scenarios. A summary table of likelihood / severity for all scenarios may be beneficial.</p>
Response:	WEGH2 acknowledges that requirements of Section 24.0 of the Environmental Impact Statement (EIS) Guidelines have been met. The Emergency Response and Contingency Plan for the Project will address the likelihood of occurrence and consequence of severity of accidents and malfunctions for applicable scenarios.
Supporting Documentation	None

Response to ECCC 51

Comment ID:	ECCC 51
Department:	Environment and Climate Change Canada
Branch/ Division:	
EIS Guidelines Reference (Where provided):	ECCC-49 25.0 Effects of the Environment on the Project
Reviewer's Comment:	<ul style="list-style-type: none"> • The current weather, climate, and metocean conditions, as well as conditions associated with climate change and coastal sea level rise (based on modelling projections), were examined in relation to their potential to result in effects on the project. Mitigation measures and residual impacts were considered. • This analysis included consideration of ice build up and release. • Impacts of surficial and bedrock geology, terrain stability, and seismic activity were assessed. Mitigation measures and residual impacts were considered. • Impacts of forest fires, based on existing conditions, were assessed. Mitigation measures and residual impacts were considered. <p>ECCC-EED flags that the EIS guidelines call for local knowledge to be considered when evaluating the potential impacts of the environment on the project. From our read, local knowledge does not appear to have been included in this section of the proponent's EIS.</p>
Response:	WEGH2 carried out a number of engagement activities prior to submission of the Environmental Impact Statement (EIS) and during the EIS review period, however WEGH2 did not receive or document 'local knowledge' that could be used to evaluate the potential effects of the environment on the Project. Data from local Environment and Climate Change Canada weather stations were accessed and included in the EIS, as well as forest fire data from the Newfoundland and Labrador Department of Fisheries, Forestry and Agriculture.
Supporting Documentation	None

Response to ECCC 52

Comment ID:	ECCC 52
Department:	Environment and Climate Change Canada
Branch/ Division:	
EIS Guidelines Reference (Where provided):	ECCC-50 4.3 Baseline Studies (Aquatic Environment)
Reviewer’s Comment:	<p>In section 11.2.1 (Methods), the report states that “A literature and data review was performed in 2023 to provide baseline information for the Aquatics Environment Baseline Study (BSA-2). The description of the existing marine environment and use was mainly sourced from previous EAs, literature, government reports, and online databases.” This is discussed further in section 4.0 (Receiving Marine Environment) of Appendix 11-A Assimilative Capacity Study. The EIS guidelines state “Where appropriate and possible to do so, the EIS shall present a time series of data and sufficient information to establish the averages, trends, and extremes of the data that are necessary for the evaluation of potential environmental effects.”</p> <p>There is an expectation that baseline sampling would be used as the primary source for establishing baseline conditions in the marine environment. This field data could complement pre-existing data sources. Baseline sampling completed prior to project approval is the most effective way to establish current ambient conditions and their variability, and evaluate the potential environmental impacts of the project. A baseline sampling program could also form the basis or refine the operational monitoring program which would monitor the ongoing influence of the project on the receiving environment and allow proponents to take appropriate adaptive management decisions. Without baseline sampling of waters and sediments in the marine environment, potential environmental effects cannot be fully evaluated.</p>
Response:	WEGH2 is committed to continue with data collection in 2024 and beyond as part of future permitting. These site-specific reports / data will be provided to regulators prior to Project construction, either as a standalone submission or as part of the permitting. WEGH2 will work with Environment and Climate Change Canada to determine the appropriate format and timing for providing reports / data.
Supporting Documentation	None

Response to ECCC 53

Comment ID:	ECCC 53
Department:	Environment and Climate Change Canada
Branch/ Division:	
EIS Guidelines Reference (Where provided):	ECCC-51 4.3 Baseline Studies(Aquatic Environment)
Reviewer’s Comment:	<p>In Chapter 2.0 (Water Resources and Use) Appendix BSA-2 Aquatic Environment Baseline Study, the report states that “Surface Water Quality samples were taken by Fracflow in September 2022 within Noels Pond, Muddy Pond, and Gull (Mine) Pond. Samples were taken following the previous development of the site for the former paper mill and indicate current baseline concentrations”. Typical surface water baseline sampling programs span multiple years across all seasons. A single sampling event may not provide effective characterization of baseline conditions. Note also that the water quality parameters collected from the existing network of regional drinking water supply are for a different purpose and may not adequately characterize baseline surface water conditions for this project.</p> <p>The proponent should confirm whether any baseline studies are planned for marine waters and sediments at the location of temporary marine landing sites or at subsea cable sites.</p>
Response:	<p>The regional drinking water network samples are an excellent source of baseline water quality data as these samples cover a wide range of baseline parameters which are relevant to characterizing baseline water quality conditions for the Project. The parameters tested in the drinking water network include total phosphorus, ammonia, DOC, nitrates, metals, alkalinity, colour, hardness, conductivity, pH, total dissolved solids (TDS), total suspended solids (TSS, for some sites), turbidity, chloride, fluoride, sodium, and sulphate, covering the suite of parameters typically recommended in baseline water quality studies. The samples cover a broad seasonal range over multiple years and therefore are adequate for characterizing regional baseline water quality.</p> <p>WEGH2 is committed to continuing with data collection in 2024 and beyond as part of fisheries related permitting and required mitigation and monitoring plans. These site-specific data will be provided to regulators prior to Project construction as part of fisheries related permitting or as part of the required mitigation and monitoring plans.</p>
Supporting Documentation	None

Response to ECCC 54

Comment ID:	ECCC 54
Department:	Environment and Climate Change Canada
Branch/ Division:	
EIS Guidelines Reference (Where provided):	ECCC-52 7.2.8.2 Groundwater and Surface Water Monitoring Program
Reviewer’s Comment:	In Table E.1., the proponent states that “The Groundwater and Surface Water Monitoring Plan will be completed and submitted to regulators prior to construction.” The proponent should provide details of proposed monitoring plans so that ECCC can comment on the potential effect of these plans on whether they will effectively mitigate potential risks.
Response:	<p>WEGH2 is committed to developing site-specific mitigation and monitoring plans, including the Groundwater (GWMP) and Surface Water Monitoring Plans (SWMP) prior to Project construction at that site. The plans will incorporate mitigation measures and monitoring commitments in the Environmental Impact Statement (EIS) and this EIS Amendment, will reflect applicable conditions of release from the environmental assessment process, and will include information on how and when updates to the plans will be made. The plans will be developed in consultation with applicable regulators, including Environment and Climate Change Canada and will be submitted for review prior to the start of Project construction at that site. WEGH2 is committed to an adaptive management approach, and as such, these plans are considered “living” documents that will be updated as applicable to capture Project design updates and results of ongoing environmental monitoring. Draft Tables of Contents for the GWMP and SWMP are provided in Appendix 2-G and 2-H, respectively.</p> <p>Methods for collection of water quality and quantity parameters to confirm EIS predictions and confirm compliance with regulatory requirements will be included in the SWMP and GWMP.</p>
Supporting Documentation	<p>Appendix 2-G Draft Table of Contents for the Surface Water Monitoring Plan</p> <p>Appendix 2-H Draft Table of Contents for the Surface Water Monitoring Plan</p>

Response to ECCC 55

Comment ID:	ECCC 55
Department:	Environment and Climate Change Canada
Branch/ Division:	
EIS Guidelines Reference (Where provided):	ECCC-53 6.2 Predicted Environmental Effects of the Undertaking / 4.3.2 Aquatic Environment
Reviewer’s Comment:	In section 11.5.1.2, the report states that “The anticipated concentration of parameters in the reject process water, which is assumed to be three times the concentration of the raw water from Noels Pond, will be discharged from a marine outfall at approximately 13 m water depth outside of the Port of Stephenville.” The proponent should indicate the parameters that have been evaluated, and explain how was “three times the concentration” was calculated. In section 4.3.2.c.(b) (Aquatic Environment), the EIS guidelines state that “the baseline study shall characterize the wastewater”. The proponent should note that without full characterization, the potential environmental effects associated with the reject process water cannot be fully evaluated.
Response:	<p>Effluent water quality is dependent to a degree on the influent water quality, which is represented by baseline water quality of the source water. Water is proposed to be supplied from the Warm Creek drainage basin, specifically withdrawn from Mine Pond / Gull Pond and Noels Pond / Muddy Pond. An analysis of the raw water from the source water locations indicates that the raw water is low in total suspended solids (TSS <10 mg/L) and associated turbidity (<5 NTU). Nitrate concentrations (<0.06 mg/L) and phosphorous concentrations were less than 30 µg/L, which is low in comparison to seawater (Bricker et al. 1999). Total metals in the source water were below the Canadian Environmental Quality Guidelines (CEQG) for the Protection of Aquatic Life – Freshwater (CCME 1999) with the exception of aluminum and copper in one sample from Noel’s Pond (Fracflow 2022). Preliminary engineering of the reverse osmosis purification system indicated that the source water would be concentrated to 300% during purification, with the deionized water used in the creation of hydrogen. As a result, the concentrations of analytical parameters analyzed were increased by 300% and compared to the CEQG for the Protection of Aquatic Life – Marine. Results on the concentrated source water indicated no exceedances of the CEQG for the Protection of Aquatic Life – Marine for trace metals and nutrients. However, temperature, salinity, and TSS were unlikely to meet CEQG for the Protection of Aquatic Life – Marine at the end of pipe, and as a result, were modelled to determine the extent of the effluent mixing zone.</p> <p>CCME (1999) defines the mixing zone as “an area contiguous with a point source (effluent) where the effluent mixes with ambient water and where concentrations of some substances may not comply with water quality guidelines or objectives”. Therefore, only effluent parameters whose concentrations are above the CEQG were modeled in the Assimilative Capacity Study. Those parameters are water temperature, salinity and TSS. The CORMIX near-field modeling showed that the mixing zone is less than 1 m (instantaneous mixing) for water temperature, salinity and TSS for most scenarios. In a worst case winter scenario, the mixing zone for water temperature and salinity can extend up to 3 m from the outfall before meeting the respective CEQG. Using the conservative modelling</p>

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	<p>assumptions, it was concluded that no exceedances of marine water quality objectives are observed at the end of the 3 m mixing zone.</p> <p>Subsequent to the completion of the Assimilative Capacity Study, which was presented in the EIS, an updated preliminary characterization of the wastewater effluent was developed (refer to response to PPD 9 and Appendix PPD9-A). A review of this updated wastewater effluent characterization has confirmed that all effluent parameters previously assessed as not exceeding the CEQG remain below guideline thresholds. Therefore, the Assimilative Capacity Study, which used conservative concentrations/values, remains valid. A revised characterization of the wastewater effluent can be provided once the Front-End Engineering Design and Detailed Design are complete, and the Assimilative Capacity Study will be revisited at that time.</p> <p>References:</p> <p>CCME (Canadian Council of Ministers of the Environment). 1999. Canadian Environmental Quality Guidelines for the Protection of Aquatic Life.</p> <p>Fracflow Consultants Inc. 2022. Report. Active Storage and Water Quality, Noels Pond, Muddy Pond, and Gull (Mine) Pond. Stephenville, NL. Report FFC NL 3168 007. 16 December 2022. 127 pp.</p>
Supporting Documentation	Appendix PPD9-A: Preliminary Wastewater Effluent Composition

Response to ECCC 56

Comment ID:	ECCC 56
Department:	Environment and Climate Change Canada
Branch/ Division:	
EIS Guidelines Reference (Where provided):	ECCC-54 4.3.2 Aquatic Environment
Reviewer’s Comment:	<p>In section 4.3.2.c.(c).i (Aquatic Environment), the EIS guidelines state that the proponent shall “contribute to the development of mitigation measures to avoid non-compliance with the Fish and Fish Habitat Protection Provisions of the Fisheries Act”. In 11.5.1.2 of the report (Operation and Maintenance), the report states that “WEGH2 is seeking regulatory approval to discharge to the marine environment”. The proponent is reminded that there is no permitting mechanism under the Fisheries Act to approve such a discharge.</p> <p>For more information on the pollution prevention provisions of the Fisheries Act, please visit https://www.canada.ca/en/environment-climate-change/services/managing-pollution/fisheries-act-registry/frequently-asked-questions.html.</p> <p>We have also noted the statement in BSA-2: “Discharges to the natural receiving environment must also meet Federal requirements of Environment and Climate Change Canada (ECCC) and its enforcement arm, DFO.” The proponent should revise this statement...it is poorly written and inaccurate.</p>

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Comment ID:	ECCC 56
Response:	<p>It is understood there are no effluent regulations made under the <i>Fisheries Act</i> to authorize the effluent discharge from the Project as it is “industrial class” if outside the industries and sectors covered by effluent regulations. However, Fisheries and Oceans Canada and Environment and Climate Change Canada will be consulted in the effluent approval process and Fish and Fish Habitat Protection Provisions in relation to effluent discharges, such as mixing zone assessment and regulatory effluent plume guidance, will be accounted for either via direct Request for Review or via regulatory engagement with Newfoundland and Labrador Department of Environment and Climate Change. Ultimately, the mixing zone effluent assessment demonstrates that there will be no death of fish nor a harmful alteration, disruption or destruction (HADD) and thus no authorization is required.</p> <p>Regarding the statement: “Discharges to the natural receiving environment must also meet Federal requirements of Environment and Climate Change Canada (ECCC) and its enforcement arm, DFO.”</p> <p>It is revised as follows: “Discharges to the natural receiving fish-bearing environment must also meet federal requirements to avoid the death of fish or harmful alteration, disruption or destruction of fish habitat and deposition of deleterious substances.”</p>
Supporting Documentation	None

Response to ECCC 57

Comment ID:	ECCC 57
Department:	Environment and Climate Change Canada
Branch/ Division:	
EIS Guidelines Reference (Where provided):	ECCC-055 4.3.2 (c).a.vi (Aquatic Environment)
Reviewer’s Comment:	<p>In sections 9.8 and 10.8 (Follow-Up and Monitoring) the report discusses how “follow-up and monitoring are intended to verify the accuracy of predictions made during the EA, to assess the implementation and effectiveness of mitigation, and to manage adaptively, if required.” It also discusses the secondary goal of fulfilling the role of regulatory compliance monitoring, where required by permitting or regulations. It also states that “Groundwater and Surface Water Monitoring Program to include surface water quality monitoring at the 11 proposed surface water quality (SWQ) sites throughout the Project Area as described in the Aquatics Environment Baseline Study (BSA-2)” The proponent should confirm any reference sites to be included in the surface water quality program. The proponent should also discuss the adequacy of the 11 recommended SWQ sites to cover potentially impacted waterbodies within the processing area, areas where the 2 windfarms and transmission infrastructure are located, as well as the receiving environment.</p>

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Comment ID:	ECCC 57
Response:	The following sites are proposed references sites to be included in the Surface Water Monitoring Plan (SWMP): SW-06-PP, SW-02-CD, and SW-02-ST. Table ECCC57.1 presents the current list of monitoring points and rationale. See also Appendix ECCC57-A for proposed surface water monitoring sampling stations. The SWMP will be developed in consultation with applicable regulators and will be submitted for review prior to Project construction at that site. WEGH2 is committed to an adaptive management approach, and as such, this Plan is considered a “living” document that will be updated as applicable to capture Project design updates and results of ongoing environmental monitoring. A draft Table of Contents for the Surface Water Monitoring Plan is provided in Appendix 2-H.
Supporting Documentation	Table ECCC57.1: Current List of Monitoring Points and Rationale Appendix 2-H Surface Water Monitoring Plan Draft Table of Contents Appendix ECCC57-A Mapbook – Proposed Surface Water Monitoring Sampling Stations

Table ECCC57.1 Current List of Monitoring Points and Rationale

Site	Station	Rationale
Port-au-Port Windfarm	SW-01-PP	Adjacent to Project infrastructure in Watershed 157, unnamed brook.
	SW-02-PP	Adjacent to Project infrastructure in Watershed 130, Mainland Brook
	SW-03-PP	Adjacent to Project infrastructure in Watershed 140, unnamed brook.
	SW-04-PP	Adjacent to Project infrastructure in Watershed 116, Harry’s Brook.
	SW-05-PP	Adjacent to Project infrastructure in Watershed 152, South Brook.
	SW-06-PP	Reference location. Located at Victor’s Brook in Watershed 108. No Project infrastructure in this watershed.
	SW-07-PP	Adjacent to Project infrastructure in Watershed 124, Red Brook
Codroy Wind Farm	SW-01-CD	Downstream of Project infrastructure in Watershed 315, Broom’s Brook.
	SW-02-CD	Reference location. Located in Highlands River. No project infrastructure upstream of this site.
Stephenville Plant Area	SW-02-ST	Outlet of Gull (Mine) Pond
	SW-02-ST	Reference location. Inflow to Noels Pond located in Watershed 226.
	ST-FDP-01	Final discharge point, end of pipe.

Response to ECCC 58

Comment ID:	ECCC 58
Department:	Environment and Climate Change Canada
Branch/ Division:	
EIS Guidelines Reference (Where provided):	ECCC-056 4.3.2.c.(b) (Aquatic Environment)
Reviewer’s Comment:	<p>In section 9.8 (Follow-Up and Monitoring) the report states “Effluent quantity and quality monitoring in compliance with ECWSR. Suggested parameters for monitoring are temperature, salinity, and TSS”. This statement seem focused on the secondary role of Follow-Up and Monitoring (regulatory compliance monitoring) rather than the primary role of verifying the accuracy of predictions made during the EA and the assessment of the effectiveness of mitigation implementation. Therefore, for this primary role, this list of 3 parameters (temperature, salinity, and TSS) would not fully characterize the effluent and should be revisited.</p> <p>With respect to regulatory compliance monitoring, the proponent is reminded that Federal regulatory requirements are different from Provincial regulatory requirements, and that meeting the Provincial ECWSR requirements does not guarantee compliance with Federal regulatory requirements including those of the <i>Fisheries Act</i>.</p>
Response:	<p>The Surface Water Monitoring Plan (SWMP) will monitor the quantity and quality of effluent for all constituents listed in Schedule A of the <i>Environmental Control Water and Sewage Regulations</i> (ECWSR). The quality of the effluent will be compared to the effluent limits listed in Schedule A as well as the Canadian Environmental Quality Guidelines (CEWG) for the Protection of Marine Aquatic Life. The ECWSR Schedule A lists the following constituents to be monitored: B.O.D; Coliform (fecal); Coliform (total); Total Dissolved Solids (TDS); Total Suspended Solids (TSS); Oils (Ether extract); Floating debris, oils, and grease; Arsenic; Barium; Boron; Cadmium; Chlorine; Chromium (hexavalent); Chromium (trivalent); Copper; Cyanide; Iron (total); Lead; Mercury; Nickel; Nitrates; Nitrogen (ammoniacal); pH; Phenol; Phosphates (total as P₂O₅); Phosphorus (elemental); Salinity; Selenium; Sulfides; Silver; Temperature; and Zinc.</p> <p>Temperature, salinity, and TSS were called out specifically among ECWSR Appendix A effluent parameters because the effluent assessment assimilative capacity study determined that of all raw water baseline constituents, the Project effluent may potentially exceed CCME CWQG-MAL guidelines for temperature, salinity and TSS (See ECCC 55). No effluent parameter is predicted to exceed ECWSR Appendix A limits.</p> <p>The SWMP will be developed in consultation with applicable regulators, and will be submitted for review prior to the start of Project construction at the site.</p>
Supporting Documentation	None

Response to ECCC 59

Comment ID:	ECCC 59
Department:	Environment and Climate Change Canada
Branch/ Division:	
EIS Guidelines Reference (Where provided):	ECCC-57 8.0 RESIDUAL EFFECTS AND DETERMINATION OF SIGNIFICANCE
Reviewer’s Comment:	<p>In section 9.3.2 (Significance Definition: Surface Water Resources) the report lists 4 items that define a significant adverse residual effect on surface water quality.</p> <p>The second bullet describes a measurable and persistent change in water quality resulting from effluent being discharged into receiving waterbodies exceeding the water quality regulations outlined in the NL Environmental Control Water and Sewage Regulations (2003) for temperature, pH, and other applicable POPC limits including nitrates, nitrogen (ammonia), and phosphorus. It is noted that there is no discussion of the requirements under the Fisheries Act in this definition.</p> <p>The fourth bullet describes a measurable and persistent change in water quality resulting that exceeds the generally accepted total suspended solids (TSS) monitoring guideline (CWQG-FAL) applied for Project activities. The proponent should clarify why only TSS is listed.</p> <p>Given the uncertainties around the definition of significant adverse effects, there may also be uncertainty about how residual effects are determined.</p>
Response:	<p>Potential effects on surface water quality for freshwater resources would include Project effects where surface water quality may be affected due to land use changes (i.e., increase in Total suspended solids (TSS)). The change in surface water quality for freshwater sources would be quantified as an increase above Canadian Environmental Quality Guideline (CEQG) for the Protection of Freshwater Aquatic Life (FAL) or baseline concentrations – whichever is higher. The definition of “deleterious” under the <i>Fisheries Act</i> is interpreted as concentrations above the CEQG-FAL limits.</p> <p>For effluent discharged into the marine environments, the discharge must meet the criteria listed in Schedule A of the <i>Environmental Control Water and Sewage Regulations</i> (ECWSR) to comply with Newfoundland and Labrador provincial requirements. As there are not yet industry-specific federal regulations for effluent discharge quality, such as the <i>Metal and Diamond Mining Effluent Regulations</i> in the mining industry, the effluent quality must be monitored and assessed to ensure it is not resulting in death of fish, not resulting in harmful alteration, disruption or destruction (HADD), and that mixing zone expectations and requirements are met. The CCME Technical Supplement 3 (2008) is accepted as federal guidance document on the management of effluent which includes the application of mixing zones where effluent is above the CEQG. Examples of these expectations and requirements include:</p> <p>The mixing zone should:</p> <ul style="list-style-type: none"> • Be as small as possible • Not be acutely toxic to aquatic organisms • Allow a zone of passage for migrating aquatic organisms • Not overlap with adjacent discharge(s)

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	<ul style="list-style-type: none"> • Not allow for the accumulation of substances in water or sediment to toxic levels <p>This guidance document lists the expectations and requirements of mixing zones that will be implemented to mitigate effects of the Project on surface water quality.</p> <p>Reference</p> <p>Canadian Council of Ministers of the Environment. 2008. Technical Supplement 3. Canada-wide Strategy for the Management of Municipal Wastewater Effluent. Standard Method and Contracting Provisions for the Environmental Risk Assessment. 2008.</p>
Supporting Documentation	None

Response to ECCC 60

Comment ID:	ECCC 60
Department:	Environment and Climate Change Canada
Branch/ Division:	
EIS Guidelines Reference (Where provided):	ECCC-58 4.3.2.c.(b) (Aquatic Environment)
Reviewer’s Comment:	<p>Section 3.0 of Appendix 11-A Assimilative Capacity Study discusses effluent characterization. It describes reject process water or effluent as source water which is eventually lost to purification effluent, cooling, and flushing water. Only temperature and salinity are modelled in the Assimilative Capacity study with some justification offered for not including other potential contaminants of concern which are not fully substantiated:</p> <ul style="list-style-type: none"> • TSS will require a dilution ratio of 5:1 at the end-of-pipe to meet CEQGs. • This effluent will contain minerals that are already present in the water source, concentrated to approximately three times the initial concentration. • Treatment of source water is not anticipated to result in the exceedance of nutrients or metals above available CEQG guidelines in the effluent. • The water column at the outfall location was assumed to be non- stratified. <p>There are also uncertainties identified:</p> <ul style="list-style-type: none"> • Water quality parameters are not known at this time and are highly dependent on the process • Effluent pipe design is not known <p>Section 4.3.2.c.(b) (Aquatic Environment) of the EIS guidelines state that “the baseline study shall characterize the wastewater”. Given the questions and uncertainties identified, more detail is required to defend the characterization of the wastewater. Any potential waste products associated with the deionization process or anti-fouling agents should also be considered in the characterization of wastewater.</p>

Comment ID:	ECCC 60
Response:	<p>In reference to effluent characterization please see response to ECCC 55.</p> <p>Water temperature, salinity and total suspended solids (TSS) were modelled as conservative parameters, i.e., their concentrations are reduced solely through physical mixing and dilution. These parameters are modelled using a dilution factor, defined as the ratio of the initial concentration of the effluent to its mixed concentration downstream of the outfall. The dilution factor gives an indication of how much the effluent has been assimilated in the receiver. The dilution ratios for various scenarios are shown in Table ECCC50.1.</p> <p>The TSS discharged at the treated effluent target of 30 mg/L may periodically exceed the CEQGs (i.e., maximum increase of 5 mg/L above the background for long-term exposure). To meet the CEQGs for TSS, a dilution ratio of 5:1 will be required in the receiver. In the studied scenarios this dilution is occurring almost instantaneously (< 0.5 m from the outfall).</p> <p>Using the conservative modelling assumptions, it was concluded that no exceedances of marine water quality guidelines for water temperature, salinity and TSS were modeled beyond the 3 m mixing zone.</p> <p>For modeling purposes, the water column at the outfall location was assumed to be non-stratified, an assumption supported by the Fisheries and Oceans Canada (DFO) Ocean Inventory Data. Stratification becomes appreciable starting at depth of about 15-20 m. The outfall for this study is located at a water depth of 12.9 m.</p> <p>The Assimilative Capacity Study was conducted using the best available design information. It is possible that the design may evolve in the future. Should there be changes to the design of the water purification, cooling water and effluent treatment systems resulting in effluent quality change, an update to the Assimilative Capacity Study may be necessary.</p>
Supporting Documentation	Table ECCC60.1: Dilution Ratios for Various Scenarios

Table ECCC60.1 Dilution Ratios for Various Scenarios

Scenario	Distance from Diffuser and Dilution Ratio			
	0.5 m	1 m	3 m	5 m
Winter, Low Current	10.4	16.7	18.7	20.5
Winter, Average Current	6.0	9.3	22.2	33.3
Summer, Low Current	12.0	12.5	14.2	15.9
Summer, Average Current	10.0	16.2	18.8	20.8

Response to ECCC 61

Comment ID:	ECCC61
Department:	Environment and Climate Change Canada
Branch/ Division:	
EIS Guidelines Reference (Where provided):	ECCC-59 4.3.2 Aquatic Environment
Reviewer’s Comment:	<p>In Chapter 2.0 (Water Resources and Use) Appendix BSA-2 Aquatic Environment Baseline Study, the report states that “The hydrogen / ammonia plant will be constructed at the former Abitibi mill property in the Stephenville Project Area. The former mill site is a known brownfield with historical effects of total petroleum hydrocarbons (TPH) and metals exceeding provincial guidelines in groundwater, including historical presence of free-phase liquid petroleum hydrocarbons (Stantec 2022).” The proponent should confirm whether impacts from previous operations at or near the site have been fully characterized in all media for contaminants that may have been associated with the mill and any other nearby industrial operations. This is an important aspect of establishing baseline conditions.</p> <p>It is also noted that the proponent intends to reuse some of the decades old existing infrastructure (discharge pipe). The proponent should confirm that the integrity of the infrastructure has been verified to withstand the significant discharge volumes over the projected life of the project.</p>
Response:	The environmental site assessment for the hydrogen / ammonia plant site is underway in consultation with the Province, including an infrastructure assessment.
Supporting Documentation:	None

Response to ECCC 62

Comment ID:	ECCC 62
Department:	Environment and Climate Change Canada
Branch/ Division:	
EIS Guidelines Reference (Where provided):	ECCC-60 4.3.2.c Aquatic Environment
Reviewer’s Comment:	Section 11.5.2 Marine Species Health and Survival states that “There are few opportunities for effects on fish health due to relatively low levels of contaminants in the sediments.” The proponent should confirm that as part of the characterization of fish and fish habitat, the contaminant levels in sediments have been quantified in areas of effluent discharge or marine offloading. The proponent should also indicate any plan to monitor sediment quality to ensure that contaminant levels remain low and any potential risks are mitigated.
Response:	Wastewater discharge will be compliance with the discharge limit under the Schedule A of the <i>Environmental Control Water and Sewage Regulations</i> . Characterization of the effluent discharge site as well as compliance monitoring will be undertaken as part of permitting requirements.
Supporting Documentation:	None

Response to ECCC 63

Comment ID:	ECCC 63
Department:	Environment and Climate Change Canada
Branch/ Division:	
EIS Guidelines Reference (Where provided):	ECCC-61 6.2 Predicted Environmental Effects of the Undertaking
Reviewer’s Comment:	In section 9.3.4 (Project Interactions with Surface Water Resources), the Proponent indicates that the presence, operation, and maintenance of wind farm infrastructure (including wind turbines, access roads, collector systems, transmission lines, and substations) would not result in potential effects on surface water quality or quantity. Given the wind farm infrastructure’s footprint as a percentage of the watershed area and the potential additive effects on flow alteration from wind turbine infrastructure and water withdrawal to support the hydrogen / ammonia plant, the Proponent should provide further rationale and justification to support this conclusion.

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Comment ID:	ECCC 63
Response:	<p>The Project will not result in a potential effect on surface water quantity or surface water quality. For surface water quantity, Project activities will not result in a potential effect as there is no change to surficial soils, except for roads and turbine pads where vegetation removal (clearing and grubbing) will be limited to these areas. The runoff from the road and turbine pads drain to the surrounding watershed. Therefore, there are no anticipated runoff losses.</p> <p>FracFlow Consultants Inc. (2024) conducted an assessment of changes in hydrologic flows within a sub-watershed in the Codroy Valley (Brooms Brook) due to 23 km of Project roads and 30 turbine pads (Appendix WRM53-A of this EIS Amendment). The land use change was estimated to be 1% of the total Brooms Brook watershed area of 104 km². A hydrologic model (HEC-HMS) was developed for Broom Brook to estimate surface water flows for pre- and post-development conditions. A visual comparison of the Broom Brook pre- and post-development hydrographs and cumulative flow results identified no substantial effects to peak flows in the watershed due to Project roads and turbine pads.</p> <p>The limited extent of tree clearing, grubbing, grading, and surficial soil replacement along with the fact that all wind farm development areas will continue to drain / runoff to existing watersheds support the conclusion that the windfarms will have negligible effects on surface water quantity.</p> <p>Similarly the Project activities will not result in a potential adverse effect on surface water quality as the grubbing, vegetation removal, and surficial soil replacement are limited to the roads and turbine pad areas. Runoff from these areas will be subject to erosion and sediment controls prior to being released to the local sub-watershed areas.</p> <p>As erosion and sediment control mitigation measures are capable and proven to significantly reduce sediment loads, once implemented, the concentration of TSS will decrease to below baseline conditions.</p> <p>The application of standard mitigation measures and best management practices to reduce erosion and sedimentation, and dust emissions, potential effects are predicted to be negligible.</p>
Supporting Documentation	Appendix WRM53-A Flood Risk Analysis for the Codroy Valley

Response to ECCC 64

Comment ID:	ECCC 64
Department:	Environment and Climate Change Canada
Branch/ Division:	
EIS Guidelines Reference (Where provided):	ECCC-62 7.2.8.2 Groundwater and Surface Water Monitoring Program
Reviewer’s Comment:	In section 9.5.1.2 (Residual Environmental Effects: Operation and Maintenance) the Proponent states “Land use changes as a percent of total watershed area are not expected to adversely affect water quantity. However, the three watersheds with the highest concentration of Project infrastructure, Mainland Brook (WSC-130), Harry’s Brook (WSC-124), and an unnamed brook on Cape St. George (WSC-144), are suggested to be monitored for changes in water quantity and quality, to ensure peak discharge events stay below Q100 flow event”. The information provided on the Groundwater and Surface Water Monitoring Program is insufficient to assess the effectiveness of the planned monitoring. It would be useful to provide details on the proposed monitoring program including sampling locations, the number of samples for each location, monitoring parameters, etc., as well as a summary of the baseline data.
Response:	To monitor changes in surface water quantity, hydrometric stations will be established in watersheds with high concentrations of Project infrastructure including WSC-130, WSC-124, and WSC-144. Additional hydrometric stations are planned to be established in the Codroy Wind Farm and at the hydrogen / ammonia plant site (refer to response to ECCC-57 for list of sites). Baseline monitoring of these stations will be completed prior to Project construction. As shown in the draft Table of Contents for the Surface Water Monitoring Plan (SWMP) (Appendix 2-H of this Environmental Impact Statement (EIS) Amendment), baseline data will be presented in the Plan. WEGH2 is committed to developing site-specific mitigation and monitoring plans, including the Groundwater (GWMP) and SWMP prior to Project construction at that site. The plans will incorporate mitigation measures and monitoring commitments in the EIS and this EIS Amendment, will reflect applicable conditions of release from the environmental assessment process, and will include information on how and when updates to the plans will be made. The plans will be developed in consultation with applicable regulators and will be submitted for review prior to Project construction at that site. WEGH2 is committed to an adaptive management approach, and as such, these plans are considered “living” documents that will be updated as applicable to capture Project design updates and results of ongoing environmental monitoring.
Supporting Documentation	Appendix 2-H Draft Table of Contents for the Surface Water Monitoring Plan

Response to ECCC 65

Comment ID:	ECCC 65
Department:	Environment and Climate Change Canada
Branch/ Division:	
EIS Guidelines Reference (Where provided):	ECCC-63 4.3.2 Baseline Studies (Aquatic Environment)
Reviewer’s Comment:	In the Aquatic Environment Baseline Study, section 2.2.2.2 Baseline Data Review, the Proponent states the “baseline data review includes publicly available data and supporting design and planning studies specific to the Project.” It is also stated in section 2.2.2.4 Surface Water Quality Monitoring Field Program that “A surface water quality monitoring field program will be carried out within watersheds at the Port au Port and Codroy wind farms and associated infrastructure in conjunction with fish habitat assessment work in the Spring/Summer of 2023.” This site-specific field program is required to further define baseline surface water quality and quantity conditions. This baseline information is required to appropriately assess potential impacts of the proposed project on surface water quality and quantity.
Response:	<p>As shown in the draft Table of Contents for the Surface Water Monitoring Plan (SWMP) (Appendix 2-H), baseline data will be presented in the SWMP. This will include data collected in 2023. Baseline water quality data was collected at 11 sites between July and August 2023. These data will be used with the regional water quality baseline data (drinking water network sources, and regional water quality stations) to develop baseline concentrations for the Project. Please refer to the response to ECCC 53 for more information on regional water quality derived from drinking water quality sites.</p> <p>WEGH2 is committed to continuing with data collection in 2024 and beyond as part of monitoring plan development. These site-specific data will be provided to regulators prior to Project construction.</p> <p>WEGH2 is committed to developing site-specific mitigation and monitoring plans, including the Groundwater (GWMP) and Surface Water Monitoring Plans (SWMP) prior to Project construction at that site. The plans will incorporate mitigation measures and monitoring commitments in the Environmental Impact Statement (EIS) and this EIS Amendment, will reflect applicable conditions of release from the environmental assessment process, and will include information on how and when updates to the plans will be made. The plans will be developed in consultation with applicable regulators and will be submitted for review prior to Project construction at that site. WEGH2 is committed to an adaptive management approach, and as such, these plans are considered “living” documents that will be updated as applicable to capture Project design updates and results of ongoing environmental monitoring.</p>
Supporting Documentation	Appendix 2-H Draft Table of Contents for the Surface Water Monitoring Plan Appendix ECCC57-A Proposed Surface Water Monitoring Sampling Stations

15.0 Fisheries and Oceans Canada

Fisheries and Oceans Canada (DFO) has provided comments based on their review of the Project Environmental Impact Statement (EIS). Detailed comments and responses are provided in Section 15.1.

15.1 Detailed Comments

Response to DFO 1

Comment ID:	DFO 1
Department:	Fisheries and Oceans Canada
Branch/ Division:	
EIS Guidelines Reference (Where provided):	2.3 Project Description 2.3.2 Construction
Reviewer's Comment:	<p>The EIS identifies 3 marine based components of this project, which have footprints ranging in size from moderate to extensive. Each component requires additional information in order for DFO to assess interactions and potential impacts to fish, fish habitat, fisheries, and other aquatic resources.</p> <p>Marine landing sites (2) have been identified as a mitigation measure (290) to potentially reduce impacts on local roads. These structures will be used throughout construction to offload the large materials required to build each turbine. The document only provides approximate measures of the built infrastructure needed at those sites.</p> <p>DFO recommends providing additional information pertaining to the proposed marine landing sites to assess project interactions with local fisheries and aquatic resources, including the final locations and if the landing sites will be temporary or permanent.</p> <p>The proponent should be advised that DFO will require site-specific fish and fish habitat information to determine if a Fisheries Act Authorization is required, following completion of the environmental assessment.</p> <p>Submarine cable - The document describes the placement of 6.4 km of submarine cable as an alternative transmission system. The proposed routing/length is pending a geotechnical investigation. To assess the interactions of the submarine cable on local fisheries and aquatic resources, additional information on the routing and length should be provided.</p> <p>Dredging - The proponent should be advised that DFO will require site specific fish and fish habitat information on the dredge and dredge disposal sites to determine whether a Fisheries Act Authorization is required, following completion of the environmental assessment.</p>

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Comment ID:	DFO 1
Response:	The west bay marine landing site has been eliminated from the Project plan. The submarine cable is now the least preferred option for the transmission line from the Port au Port peninsula. Fish, Food, and Allied Workers Union (FFAW) has been consulted on changes to the marine components of the Project. WEGH2 has committed to ongoing engagement with FFAW, Newfoundland and Labrador Department of Fisheries Forestry and Agriculture (NLFFA) and Fisheries and Oceans Canada (DFO) during the design of the marine landing site in Aguathuna. Site specific fish and fish habitat information for the marine landing sites and the dredge and dredge disposal sites will be provided to determine whether a <i>Fisheries Act</i> Authorization is required, following completion of the environmental assessment process.
Supporting Documentation:	None

Response to DFO 2

Comment ID:	DFO 2
Department:	Fisheries and Oceans Canada
Branch/ Division:	
EIS Guidelines Reference (Where provided):	2.3.4 Decommissioning and Rehabilitation
Reviewer's Comment:	Please provide details related to how watercourse crossings, specifically culverts and bridges, will be maintained, to ensure the safe passage of fish and avoid or mitigate impacts to fish habitat from erosion and sedimentation events.
Response:	<p>The Project will maintain a register of water crossings complete with key risks with respect to interactions and potential impact upon fish and other wildlife resource users, and communities. This register will be reviewed annually and updated with inspection observations and stakeholder feedback to inform the inspection process and develop maintenance plans.</p> <p>Identified condition issues will be contained in a report to be reviewed by Maintenance Manager/senior management, prioritized and incorporated into an ongoing water crossing maintenance plan. Additional measures will include a mechanism to initiate inspection after a significant weather or geo event (e.g., heavy rainfalls, landslides). and signage at water crossings aimed at other road users detailing contact information where other users can log concerns, observations and alerts pertaining to water crossing conditions.</p> <p>At the end of the construction phase, WEGH2 will use as-built crossing data for the purposes of generating a risk-based asset integrity plan that includes regular inspections (by risk-ranked priority wherein culverts and crossing presenting high risk are inspected more frequently) and preventative maintenance measures (e.g., removal of obstacles, placement of armour stone, etc.). All culvert inspections will be documented using a geo-spatial referenced platform, allowing for viewing of latest inspection in WEGH2 Geographic Information Systems (GIS) platform.</p>

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Comment ID:	DFO 2
	At the end of the Project, and post decommissioning, culverts will be removed from fish bearing water bodies to facilitate the passage of fish once the inspection and maintenance program has ended.
Supporting Documentation:	None

Response to DFO 3

Comment ID:	DFO 3
Department:	Fisheries and Oceans Canada
Branch/ Division:	
EIS Guidelines Reference (Where provided):	2.3.5 Regulatory Framework and Government Oversight
Reviewer's Comment:	Chapter 1.3.3 The proponent recognizes the regulatory requirements existing beyond the provincial environmental assessment process and lists the municipal, provincial, and federal regulators that will require consultation through the development phase of this project. Table 1.4 acknowledges a <i>Fisheries Act</i> Authorization or Letter of Advice pursuant to section 35(2) of the <i>Fisheries Act</i> may be required following completion of the environmental assessment. The proponent should be advised that DFO will require site- specific fish and fish habitat information on marine components to determine if a <i>Fisheries Act</i> Authorization is required, following completion of the environmental assessment.
Response:	WEGH2 is committed to continuing with ongoing data collection as part of <i>Fisheries Act</i> related permitting. These site-specific data will be provided to regulators prior to construction at the respective site.
Supporting Documentation:	None

Response to DFO 4

Comment ID:	DFO 4
Department:	Fisheries and Oceans Canada
Branch/ Division:	
EIS Guidelines Reference (Where provided):	4.2 Existing Environment 4.2.2 Aquatic Environment

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Comment ID:	DFO 4
Reviewer’s Comment:	<p>The descriptions of the existing aquatic environment have been based on Appendix BSA- 2: Aquatic Environment Baseline Study which was primarily completed using a desktop assessment.</p> <p>Additional information is required on the various project components (e.g., locations, construction methods, etc...) and how they may interact with and potentially impact fish, fish habitat, local fisheries, and other aquatic resources in the marine environment.</p> <p>While the desktop assessment, classifications, and assumptions used may be based on proven methods and practices as described, it does not meet Fisheries and Oceans Canada guidance for the data collection used to define a baseline for the classification of fish habitat or fish species for the purposes of the regulatory phase (i.e., requirement for <i>Fisheries Act</i> Authorization).</p> <p>The desktop assessment represents a prediction of the physical environment found at each of the identified sites and may not accurately represent the current environment (as per the Project EIS guidelines section 4.3.2).</p> <p>Through previous consultation with the proponent, DFO expressed the requirement to have site- specific data collected at each potentially impacted site and to have the characterizations based on that data for managing these impacts during the regulatory phase.</p> <p>There are references in the EIS to a Food Social and Ceremonial (FSC) license held by Qalipu First Nation, however, Qalipu First Nation does not currently hold FSC licenses; there are no FSC licenses held in 4R. Suggest all references to existing FSC fisheries be removed. A FSC license may be issued to Qalipu First Nation in the future, therefore, reference to FSC can be kept in Tables 21.2 and 21.3.</p>
Response:	<p>As discussed at a meeting with Fisheries and Oceans Canada (DFO) on March 30, 2023, the desktop assessment was intended to inform the assessment and baseline conditions and aid in identifying appropriate mitigation while field surveys were underway or while project engineering was being undertaken.</p> <p>To inform the regulatory phase and to validate the desktop assessment, an extensive baseline program was completed as of late October 2023, including environmental deoxyribonucleic acid (eDNA) sampling at the Port aux Port Wind Farm, transmission line, and the hydrogen / ammonia plant to identify species present (refer to Appendix 2-A for the 2023 Fish and Fish Habitat Technical Data Report). The approach to fieldwork was presented, modified and approved by DFO and the provincial Inland Fisheries branch. Habitats assessed included watercourses and waterbodies likely to interact with the project based on the footprints provided and validates the desktop assessment. It is our understanding that the information contained within the 2023 Fish and Fish Habitat Technical Data Report will be sufficient to inform the regulatory phase of the Project and meets the guidance for the data collection methods used to define a baseline.</p> <p>WEGH2 is committed to continuing with ongoing data collection as part of <i>Fisheries Act</i> related permitting. These site-specific data will be provided to regulators prior to construction at the respective site.</p> <p>Comment noted regarding Food, Social and Ceremonial fisheries.</p>
Supporting Documentation	Appendix 2-A: 2023 Fish and Fish Habitat Technical Data Report

Response to DFO 5

Comment ID:	DFO 5
Department:	Fisheries and Oceans Canada
Branch/ Division:	
EIS Guidelines Reference (Where provided):	4.3 Baseline Studies 4.3.2 Aquatic Environment
Reviewer’s Comment:	<p>The descriptions of the existing aquatic environment have been based on Appendix BSA- 2: Aquatic Environment Baseline Study which was primarily completed using a desktop assessment.</p> <p>DFO acknowledges that final routing of access roads and transmission lines will be determined during the construction phase. However, DFO will require the proponent to commit to industry best practices and mitigations outlined in the EIS, during all phases of the project. This is particularly important for works and activities in or adjacent to scheduled Atlantic salmon rivers. These mitigations should include clear span bridges where appropriate, fish passage, timing windows, erosion /sedimentation control, and others to be determined through consultation with DFO.</p> <p>While the desktop assessment, classifications, and assumptions used may be based on proven methods and practices as described, it does not meet Fisheries and Oceans Canada guidance for the data collection used to define a baseline for the classification of fish habitat or fish species for the purposes of the regulatory phase (i.e., requirement for <i>Fisheries Act</i> Authorization).</p> <p>The desktop assessment represents a prediction of the physical environment found at each of the identified sites and may not accurately represent the current environment (as per the Project EIS guidelines section 4.3.2).</p> <p>Through previous consultation with the proponent, DFO expressed the requirement to have site- specific data collected at each potentially impacted site and to have the characterizations based on that data for managing these impacts during the regulatory phase.</p>
Response:	<p>WEGH2 is committing to industry best practices and mitigations as outlined in the EIS, during all phases of the Project.</p> <p>To inform the regulatory phase and to validate the desktop assessment, an extensive baseline data collection program was completed as of late October 2023, including environmental deoxyribonucleic acid (eDNA) sampling at the Port aux Port Wind Farm, transmission line, and hydrogen / ammonia plant to identify species present (refer to Appendix 2-A - 2023 Fish and Fish Habitat Technical Data Report). The approach to fieldwork was presented, modified and approved by DFO and the provincial Inland Fisheries branch.</p> <p>WEGH2 is committed to continuing with ongoing data collection as part of Fisheries Act related permitting. These site-specific data will be provided to regulators prior to construction at the respective site. It is our understanding that the information contained within the 2023 Fish and Fish Habitat</p>

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Comment ID:	DFO 5
	Technical Data Report will be sufficient to inform the regulatory phase of the Project and meets the guidance for the data collection methods used to define a baseline.
Supporting Documentation	Appendix 2-A: 2023 Fish and Fish Habitat Technical Data Report

Response to DFO 6

Comment ID:	DFO 6
Department:	Fisheries and Oceans Canada
Branch/ Division:	
EIS Guidelines Reference (Where provided):	5.0 Data Gaps
Reviewer's Comment:	<p>Through previous consultation with the proponent, DFO expressed the requirement to have site- specific data collected at each potentially impacted site and to have the characterizations based on that data. It is the understanding of DFO that the proponent has spent this field season (summer 2023) collecting habitat and species data at each of the potentially impacted sites.</p> <p>The proponent should be advised that DFO will require site-specific fish and fish habitat information to determine if a <i>Fisheries Act</i> Authorization is required, following completion of the environmental assessment.</p>
Response:	Comment noted. The intention is to work with Fisheries and Oceans Canada to determine if a <i>Fisheries Act</i> Authorization is required and to incorporate the results of the 2023 field studies and any new data requirements into the request for review application.
Supporting Documentation	None

Response to DFO 7

Comment ID:	DFO 7
Department:	Fisheries and Oceans Canada
Branch/ Division:	
EIS Guidelines Reference (Where provided):	6.2 Predicted Environmental Effects of the Undertaking
Reviewer’s Comment:	The EIS indicates that the proponent will develop and submit a "Groundwater and Surface Water Monitoring Plan" to regulatory authorities before construction begins. This document should provide a level of information related to water use and management to ensure impacts on fish and fish habitat are mitigated. The proponent should meet with DFO to determine the required information and mitigations in the plan.
Response:	<p>The specified monitoring plans will be developed in consultation with applicable regulators, including Fisheries and Oceans Canada (DFO), and will be submitted for review prior to the start of Project construction at that site.</p> <p>WEGH2 is committed to developing site-specific mitigation and monitoring plans, including the Groundwater (GWMP) and Surface Water Monitoring Plans (SWMP) and an Environmental Protection Plan (EPP) prior to Project construction at that site. The plans will incorporate mitigation measures and monitoring commitments in the Environmental Impact Statement (EIS) (Stantec 2023) and this EIS Amendment, will reflect applicable conditions of release from the environmental assessment process, and will include information on how and when updates to the plans will be made. The SWMP will include monitoring details (i.e., sites, frequency, parameters) to confirm impacts to fish and fish habitat are mitigated and the EPP will include mitigation measures for fish and fish habitat. Appendix 2-G and Appendix 2-H include a draft table of contents for the Groundwater and Surface Water Monitoring Plans, respectively. WEGH2 is committed to an adaptive management approach, and as such, these plans are considered “living” documents that will be updated as applicable to capture Project design updates and results of ongoing environmental monitoring.</p>
Supporting Documentation	<p>Appendix 2-G: Draft TOC for the Groundwater Monitoring Plan</p> <p>Appendix 2-H: Draft TOC for the Surface Water Monitoring Plan</p>

Response to DFO 8

Comment ID:	DFO 8
Department:	Fisheries and Oceans Canada
Branch/ Division:	
EIS Guidelines Reference (Where provided):	7.0 Environmental Protection - Mitigations and Plans 7.1 Mitigations
Reviewer’s Comment:	<p>The proponent provided lists of potential mitigations to be used during works in the freshwater and marine environments to limit impacts on the affected fish and fish habitats. These lists: Table 10.5 Mitigation Measures; Freshwater Fish and Fish Habitat and Table 11.5 Mitigation Measures: Marine Environment and Use are not exhaustive. The mitigations identified are not explicitly linked to specific project components or their potential impacts on fish and fish habitat.</p> <p>DFO acknowledges that final routing of access roads and transmission lines will be determined during the construction phase. However, DFO will require the proponent to commit to industry best practices and mitigations outlined in the EIS, during all phases of the project. This is particularly important for works and activities in or adjacent to scheduled Atlantic salmon rivers. These mitigations should include clear span bridges where appropriate, fish passage, timing windows, erosion /sedimentation control, and others to be determined through consultation with DFO.</p> <p>Additional information is required on the various project components (e.g., locations, construction methods, etc...) and how they may interact with and potentially impact fish, fish habitat, local fisheries, and other aquatic resources in the marine environment.</p>
Response:	Noted. The intention is to work with Fisheries and Oceans Canada (DFO) to determine if a <i>Fisheries Act</i> Authorization is required and incorporate the results of the 2023 field studies and any new data requirements in the request for review applications as applicable. WEGH2 will work with DFO to identify site-specific (i.e., Atlantic salmon rivers) or component-specific (i.e., watercourse crossings) mitigation during the permitting process.
Supporting Documentation	None

Response to DFO 9

Comment ID:	DFO 9
Department:	Fisheries and Oceans Canada
Branch/ Division:	
EIS Guidelines Reference (Where provided):	1.2 Plans 7.2.8.2 Groundwater and Surface Water Monitoring Program
Reviewer's Comment:	The EIS indicates that the proponent will develop and submit a "Groundwater and Surface Water Monitoring Plan" to regulatory authorities before construction begins. This document should provide a level of information related to water use and management to ensure impacts on fish and fish habitat are mitigated. The proponent should meet with DFO to determine the required information and mitigations in the plan.
Response:	Noted. Please refer to the response provided for DFO 7.
Supporting Documentation	None

Response to DFO 10

Comment ID:	DFO 10
Department:	Fisheries and Oceans Canada
Branch/ Division:	
EIS Guidelines Reference (Where provided):	14.0 Commitments made in the EIS
Reviewer's Comment:	The proponent provided lists of potential mitigations to be used during works in the freshwater and marine environments to limit impacts on the affected fish and fish habitats. These lists: Table 10.5 Mitigation Measures: Freshwater Fish and Fish Habitat and Table 11.5 Mitigation Measures: Marine Environment and Use are not exhaustive. The mitigations identified are not explicitly linked to specific project components or their potential impacts on fish and fish habitat. Measures to limit the impacts on fish and fish habitat would include avoiding sensitive areas (e.g., spawning grounds) adhering to timing windows, not interfering with active fisheries, clear span bridges where appropriate, and maintaining buffer zones around fish habitat, etc. Additional information on these and other mitigations will be required during the regulatory phase.
Response:	Noted. Please refer to the response provided for DFO 8.
Supporting Documentation	None