

APR 19 2024

COR-2024-1679

Reg.#2290

Alasdair Federico  
Vice-President, Corporate Affairs  
Atlas Salt Inc.  
100 New Gower Street, Suite 910  
St. John's, NL A1C6K3  
E-mail: [info@atlassalt.com](mailto:info@atlassalt.com)

Dear Alasdair Federico:

**RE: St. George's Great Atlantic Salt Project (the Project)**

Your proposal has been reviewed by an interdepartmental environmental assessment screening committee and an opportunity to comment has been provided to the public as required by Part X of the Newfoundland and Labrador **Environmental Protection Act**, SNL 2002, cE-14.2. Please be advised that the Project is **released** from further environmental assessment subject to the following conditions:

- You must uphold all commitments made in your environmental assessment submission to mitigate the effects of the Project on the environment.
- The Pollution Prevention Division (PPD) of the Department of Environment and Climate Change (ECC) requires the following:
  - A Certificate of Approval is required prior to Project construction. For further information, please e-mail PPD at [dpittman@gov.nl.ca](mailto:dpittman@gov.nl.ca) or call 709-729-6771.
  - A Waste Management Plan for the construction and operation phases of the Project must be approved by PPD prior to Project construction. For further information, please e-mail PPD at [ryanm@gov.nl.ca](mailto:ryanm@gov.nl.ca) or call 709-729-1810.
- The Water Resources Management Division (WRMD) of ECC requires the following:
  - Prior to Project construction, the following plans must be approved by the WRMD:
    - Water Resources Management Plan;
    - Emergency Response Plan, including breaching of the settling pond dam;
    - Wetlands Conservation Plan that includes encroachment prevention procedures to prevent indirect effects to wetlands around the Project area; and
    - Environmental Protection Plan that includes erosion/sedimentation protection measures, site water control measures (including settling pond) and

- encroachment prevention procedures to prevent indirect effects around the Project area.
- A full groundwater assessment is required and shall include, but may not be limited to:
    - data collected in the planned hydrogeological investigation programs, including seasonal groundwater variations, transient groundwater modelling, hydraulic conductivity testing of relevant units, pumping tests, etc.;
    - confirmation of dewatering requirements outlined in the initial groundwater modelling;
    - the potential effects of the drawdown on the quality and quantity of groundwater (including potential effects of saltwater intrusion) due to mine dewatering and any potential effects to the St. George's public water supply wells and other private wells in the area; and
    - an assessment of climate change, and in particular the potential cumulative effects of sea level rise and saltwater intrusion due to mine dewatering. A report with this information shall be submitted to WRMD for approval prior to the commencement of construction activities.
  - A Real-time Water Quality/Quantity network may be required for monitoring surface water and/or groundwater. Terms and conditions for the real time station(s) will be stipulated in the regulatory permits required to be issued once the Project is released from under the EA process. Atlas Salt Inc. is to bear all capital and operation/maintenance costs associated with the real-time monitoring network. Monitoring stations must be installed prior to the commencement of Project construction.
  - The Department of Fisheries, Forestry and Agriculture requires the following bat monitoring measures to be implemented in the Project vicinity:
    - Bat acoustic monitoring data shall be obtained from appropriate habitat within the Project footprint between April 15 and October 15, either from existing sources or additional field studies. Bat species identification from acoustic call data must be manually verified. Past and future raw recorded call files must be made available to the Wildlife Division.
    - Should tree removal be necessary during the bat roosting period from May 1 to Sept 1, Atlas Salt Inc. is required to conduct a pre-clearing survey of all large trees and snags with a diameter at breast height of greater than 25 centimetres and report survey results to [wildlifereferrals@gov.nl.ca](mailto:wildlifereferrals@gov.nl.ca). Should an active bat colony be detected, a no-cut buffer of 250-metres must be applied, and a bat emergence survey must be conducted to confirm fledging of juveniles.
    - A Preventative Measures Plan to discourage bat occupation of infrastructure and underground areas must be developed and approved by FFA prior to the commencement of Project construction. Any bats detected must be immediately reported to the Wildlife Division. If any bats are found in the underground mining shafts, operations must immediately cease, and the Wildlife Division must be

contacted. The Preventative Measures Plan must include provisions for times of temporary closures and after Project decommissioning.

- Surveys for Black Ash are required and shall be presented to the Wildlife Division for further consultation regarding any potential mitigation requirements prior to the commencement of Project construction.
- Digital plant location data and survey tracks for past and future vegetation surveys must be made available to the Wildlife Division ([wildlifereferrals@gov.nl.ca](mailto:wildlifereferrals@gov.nl.ca)).
- Vegetation clearing is not to occur within 800 metres of a bald eagle or osprey nest during the nesting season (March 15 to July 31) or within 200 metres during the remainder of the year. The 200-metre buffer applies to all other raptor nests (e.g. Northern Goshawk, Sharp-shinned Hawk, Merlin, American Kestrel, Great-horned Owl, Boreal Owl, Northern Saw-whet Owl). The location of any raptor nest sites shall be reported to the Wildlife Division.
- A Mitigations Plan that outlines measures that will be implemented to mitigate potential adverse effects of runoff into the tributary that flows into Flat Bay Brook, and measures to protect American eel, mummichog and banded killifish, must be submitted to Wildlife Division for approval prior to the commencement of Project construction. For more information, please contact the Wildlife Division of FFA at [wildlifereferrals@gov.nl.ca](mailto:wildlifereferrals@gov.nl.ca).
- The Department of Industry, Energy and Technology (IET) requires the development of a Benefits Plan that meets the approval of the Minister of IET. The Benefits Plan must also include a Gender Equity, Diversity and Inclusion Plan that meets the approval of the Minister responsible for Women and Gender Equality. The noted approvals are required prior to the commencement of site activities. For more information, please contact IET at (709) 729-3131.
- You must advise the Environmental Assessment Division when the conditions of release have been met, by e-mailing a written description, documents, and images (where applicable) to demonstrate that the conditions have been fulfilled to [EAProjectComments@gov.nl.ca](mailto:EAProjectComments@gov.nl.ca).
- You must update the Environmental Assessment Division on the status of the Project, including a copy of all permits, licences, certificates, approvals and other authorizations required for the Project, within one year from the date of this release letter and to provide additional updates if required. Please e-mail the Project updates to [EAProjectComments@gov.nl.ca](mailto:EAProjectComments@gov.nl.ca).



Although the undertaking as proposed is released from further environmental assessment, it is still subject to other legislative requirements. You must comply with all relevant legislation and obtain all necessary permits and approvals. You must inform this Department of any proposed significant changes to the undertaking.

Please note that in accordance with Section 17 of the Environmental Assessment Regulations, my decision is valid for a period of three years from the date of this letter. If you have not commenced the Project within this three-year period, you may apply to extend the term of my decision for a maximum of three periods of one year. Should the term of my decision expire, the Project will have to be registered again for environmental assessment, if you wish to proceed. For further information, please e-mail [EAProjectComments@gov.nl.ca](mailto:EAProjectComments@gov.nl.ca).

If you have any questions about the environmental assessment process, please contact Joanne Sweeney, Director of the Environmental Assessment Division, at (709) 729-0673 or e-mail [joannesweeney@gov.nl.ca](mailto:joannesweeney@gov.nl.ca)

Sincerely,

A handwritten signature in blue ink, appearing to be "B. Davis", enclosed in a blue oval.

**HON. BERNARD DAVIS, MHA**  
District of Virginia Waters – Pleasantville  
Minister

Cc: Scott Reid, MHA – St. George's-Humber