



ENVIRONMENTAL IMPACT STATEMENT GUIDELINES

Environmental Assessment Registration No. 2406

St. Lawrence South Ridge Fluorspar Mine Extension

Canada Fluorspar (NL) Inc.

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PART 1 – BACKGROUND

Purpose of the Environmental Impact Statement

The purpose of the environmental impact statement (EIS) is to identify for all phases of the Project (construction, operation and maintenance, decommissioning and rehabilitation) the important beneficial and adverse environmental effects associated with the Project, measures to mitigate adverse effects, the significance of residual environmental effects, public concerns and the response to those concerns. The environmental effects and mitigations associated with the proposed St. Lawrence South Ridge Fluorspar Mine Extension (the Project) may also be subject to evaluation through the licensing and permitting processes and regulatory oversight of federal and provincial government departments/agencies and municipalities, should the Project be released from environmental assessment. Information provided in the EIS may be used to inform other regulatory processes.

The EIS shall describe all components and sites that are needed to make the Project operational and viable.

Purpose of the EIS Guidelines

On June 16, 2026, the Minister of Environment, Conservation and Climate Change (the Minister) informed Canada Fluorspar (NL) Inc. (the Proponent) that an EIS is required for the Project. The purpose of the EIS Guidelines (the Guidelines) is to identify for the Proponent the nature, scope and extent of the information and analysis required in the preparation of the EIS. The EIS shall address all requirements outlined in the Guidelines. Where the Proponent is of the opinion that the information should not be required, it should contact the relevant regulatory authority to confirm the rationale for not including it, prior to submitting the EIS. The rationale for not including the information shall be provided in the EIS. Part 3 of the Guidelines outlines in detail the content of the EIS to be prepared. The EIS is a statement of the Proponent's environmental conclusions and

commitments related to the Project and must be explicitly endorsed by the Proponent.

Proposed Project Description

The Proponent is proposing to develop an open-pit fluorspar mine located approximately 2 kilometres southwest of the town of St. Lawrence on the Burin Peninsula. The Project represents a satellite expansion of the existing operation and will utilize current infrastructure for processing and export via the existing Blue Beach Marine Terminal. Mining will use conventional drill-and-blast methods, with excavation carried out by excavators and loaders. Material will be transported by haul trucks to on-site stockpiles. Ore will then be hauled approximately 3.5 kilometres to the existing processing facility, where it will be milled into acid-grade fluorspar concentrate (97.5% CaF_2). Processed concentrate will then be hauled to the Blue Beach Marine Terminal via the Blue Beach Haul Road (existing) for export. The Project includes approximately six months of construction, 18 months of production, and 24 months of closure activities. Peak production is anticipated to reach approximately 65,286 tonnes per month, with total material movement exceeding five million tonnes, including ore, overburden, and waste rock. Development will rely primarily on existing infrastructure, including the processing mill, tailings management facility, haul roads, and marine terminal. New components will include the mine pit, pit access roads, stockpile areas (topsoil, overburden, and waste rock), and water management infrastructure (e.g., sedimentation ponds and dewatering wells). The Project is expected to include approximately 35-45 direct new full-time positions associated with mining activities such as drilling, blasting, hauling, and equipment operation. The Project will also help sustain existing employment by providing higher-grade ore to maintain mill throughput. Up to 10 personnel from the current operation may be redeployed to the South Ridge site as required.

An EIS was required for the Project in response to public concern that was submitted for the Minister's consideration during the registration review phase of the environmental assessment. Information requirements of the EIS guidelines are focused on public concerns and measures to mitigate those concerns, and technical information required

by government departments.

PART 2 – PREPARATION AND PRESENTATION OF THE EIS

The EIS shall be written in terms understandable to the general public; however, where the complexity of the issues requires the use of technical language, a glossary defining technical words and acronyms shall be included.

All sources of information used in the EIS shall be referenced within the body of the EIS and cited in Section 11. Where conclusions that are critical to the assessment of environmental effects are cited from other reports, the EIS shall provide sufficient detail of the original data and analysis to enable a critical review of that material and shall reference the material in an appendix to the EIS. All conclusions regarding the receiving environment and predictions of the environmental effects shall be substantiated.

The EIS shall reference, rather than repeat, information presented in previous sections of the EIS. For clarity and ease of reference, the EIS shall include a Table of Concordance that cross references the Guidelines so that points raised in the Guidelines are easily located in the EIS. A Table of Contents, providing the location of information in the final document by volume (if applicable), section, subsection and page number is required.

The EIS shall identify any changes to the Project as originally proposed in the environmental assessment registration document, including the reasons for these changes that may result in a different set of effects and may require a reconsideration of information requirements.

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. Where possible, maps shall use common scales to allow for comparison and overlay of mapped features and shall indicate common and accepted local place names. Geographic information shall be provided in standard Geographic Information System (GIS) mapping (digital) format, where feasible. The EIS and all

associated reports and studies shall use the International System of Units (SI) of measure and terminology.

The EIS shall be a stand-alone document upon which a critical review can be undertaken. The Proponent shall explain and justify all methods used in the preparation of the EIS, including the use of scientific, engineering, Indigenous, local, and other knowledge. All hypotheses and assumptions shall be clearly identified and justified. All data collection methods, models, and studies shall be documented so that the analyses are transparent and reproducible. The degree of uncertainty, reliability, and sensitivity of models used to reach conclusions shall be indicated.

The information included in this document is not intended to be exhaustive, and additional detail, studies, and/or examination of components may be required. The content of the EIS should be organized according to the format described in PART 3.

A licence, permit, approval or other document of authorization may be required by law under the **Environmental Protection Act**, SNL 2002, cE-14.2 (**EPA**) or another Act for work that must be conducted by the Proponent to fulfill the information requirements of the Guidelines. Section 68(1)(a) of the **EPA** does not apply to work that must be carried out by the Proponent to inform the EIS, as determined by the Minister. It is recommended that the Proponent include a note with the submission of these applications to advise that the licence, permit, approval or other document is needed to conduct work that will inform the EIS.

PART 3 - OUTLINE OF THE EIS

Executive Summary

The executive summary shall contain the following information:

- identification of the Proponent;
- a brief Project description;

- predicted biophysical environmental effects, including cumulative effects associated with the Project and other existing and reasonably expected future projects in the vicinity of the Project site;
- socio-economic factors;
- alternatives;
- mitigation measures;
- residual effects;
- follow-up and monitoring programs;
- a summary of the fundamental conclusions of the EIS; and
- a glossary of terms.

The Table of Concordance may be included in the executive summary. The executive summary shall also be made available as a stand-alone Plain Language Summary.

Project Information

1 Introduction

1.1 Name of the Undertaking

For the purpose of EA, the name assigned to the Project by the Department of Environment, Conservation and Climate Change (ECC) is the St. Lawrence South Ridge Fluorspar Mine Extension.

1.2 The Proponent

This subsection shall introduce the Proponent by providing the following pertinent information:

- a) name of, and contact information for the corporate body;
- b) name of, and contact information for chief executive officer;
- c) principal contact person for the purpose of environmental assessment, and contact information;

- d) key personnel, contractors, and/or subcontractors responsible for preparing the EIS, and contact information; and
- e) disclosure of any affiliation with government or non-government organizations.

This subsection shall include a description of the Proponent's history of mining, identifying any previous and current similar projects and their associated successes, failures and lessons learned.

1.3 Overview of the Undertaking

The intent of the overview is to identify the key Project components, rather than provide a detailed description of the Project, which will follow under Section 2. The Proponent shall briefly summarize the Project by presenting the major Project components, associated activities, scheduling details, timing of each phase of the Project and other key features, including a high-level map illustrating key Project components. If development of the Project follows a phased approach, information about the incremental and phased development of the Project, including the timing of each phase of the Project, shall be described.

Key components of the Project shall include, but may not be limited to, the following:

- a) mine open pit(s);
- b) all stockpiles, including topsoil, overburden and waste rock;
- c) tailings management facility;
- d) water management infrastructure to collect contact and non-contact water, including dams, dikes, perimeter ditches, settlement ponds, and collection ponds;
- e) all roads, including mining haul roads and publicly used recreational access roads and areas within and adjacent to the Project; and
- f) supporting infrastructure, including transmission lines, quarries, and mine service areas (garages, warehouses, offices, etc.).

2 THE PROPOSED UNDERTAKING

2.1 Rationale for the Undertaking

The EIS shall describe the rationale for the Project in terms of its need and purpose. The need for the Project refers to a problem, opportunity or demand that the proposed Project is intending to solve or satisfy and establishes the fundamental justification or rationale for the Project. The information provided shall make it possible to reasonably conclude that there is an opportunity or issue that warrants a response and that the Project is an appropriate approach.

The purpose of the Project shall outline what is to be achieved by carrying out the Project. The EIS shall broadly classify the Project as a critical mineral development project and describe any objectives the Proponent has in carrying out the Project. If the objectives are related to broader private or public sector policies, plans or programs (e.g., federal and provincial government), this information should be included.

The need for and purpose of the Project should be established from the perspective of the Proponent and provide the context for the consideration of alternatives, in Section 3.

2.2 Project Description

The EIS shall describe, in the ensuing subsections of 2.2, the scope of the Project for which the EIS is being conducted, for all phases of the Project (construction, operation and maintenance, and decommissioning and rehabilitation).

2.2.1 General Layout

The EIS shall contain a description of the geographical settings in which all physical components of the Project will take place, including maps / aerial images / digital geospatial data. A precise description of geographic boundaries of all proposed Project components and sites that make the Project viable shall be provided, including, but not limited to, the following:

- a) all existing mine infrastructure (production plant and mill, tailings management, AGS pits, waste rock facilities, stockpiles, administrative buildings, marine

terminal);

- b) access roads, including shared mining and public access roads, haul roads, quarries and transmission lines;
- c) water courses (rivers, brooks, creeks, etc.), water bodies (lakes, ponds, reservoirs, etc.) and wetlands (bogs, fens, marshes, swamps, etc.) within and adjacent to the project boundary;
- d) water management infrastructure designed to collect contact and non-contact water, including dams, dikes, perimeter ditches, settlement ponds, collection ponds;
- e) water supply and discharge locations;
- f) effluent and wastewater discharge locations;
- g) fuel, explosives and hazardous materials storage facilities, if applicable; and
- h) workforce accommodations and associated infrastructure.

2.2.2 Construction

Details of materials, methods, schedule, and locations of all construction activities (including permanent and temporary infrastructure related to physical features) shall be described and shall include, but may not be limited to, the following:

- a) construction planning and development schedule;
- b) site preparation, clearing, blasting and blast radius for the Project components;
- c) emissions inventory and prediction of the dispersion of emissions from all aspects of Project construction (e.g., access roads and haul roads, pit stripping and stockpile development, etc.);
- d) sources and predicted decibel levels and duration of noise, including noise during blasting, piling and other construction works;
- e) sources of light intensity and emissions from Project construction;
- f) in-water works, such as intakes, outfalls, fording, removal of aquatic and/or stream side vegetation, dewatering, water use activities, changes to natural flow regime, dredging, piling, blasting, infilling, and placement of in-water infrastructure in the marine and freshwater environments;

- g) water management infrastructure including dams, dikes, perimeter ditches, settlement ponds, and collection ponds;
- h) access roads (new and upgrades to existing), including shared public access roads and haul roads, trails, and any water crossings and infrastructure associated with water crossings (e.g., culverts, dams, bridge structures, etc.);
- i) sources of dust liftoff during construction activities (e.g., blasting, access roads, haul roads, open pits, stockpiles etc.); and
- j) transport, storage, and use of all hazardous materials, fuels and lubricants required
- k) during construction, including a description of best management practices for the storage of waste dangerous goods/hazardous waste.

2.2.3 *Operation and Maintenance*

Aspects of the operation and maintenance procedures for the undertaking shall be described in this subsection of the EIS and may include, but not be limited to:

- a) details of each phase of mining operations, including any proposed expansions (if the Project will be developed in phases);
- b) all access roads, including shared public access roads and haul roads, and trails, if different from those identified in section 2.2.2;
- c) water intake and dewatering requirements, including updated dewatering modelling with new data added to refine dewatering requirements and wastewater discharge for Project operations;
- d) port facilities and shipping operations including the transportation of materials from the ore production facility to markets, estimated frequency of shipments and vessel sizes;
- e) sources and predicted vibrations, decibels, duration, and geographic reach of noise from Project operations, including long-term, low frequency and infrasound noise emissions;
- f) sources of light intensity and emissions from Project operations;
- g) chemicals and hazardous materials to be used in operations;
- h) sources of dust liftoff during Project operations (e.g., blasting, access roads,

including shared public access roads and haul roads, open pits, stockpiles etc.); and

- i) transport, storage, and use of all hazardous materials, fuels and lubricants required during operation and maintenance, including a description of best management practices for the storage of dangerous goods/hazardous waste.

2.2.4 Decommissioning and Rehabilitation

The EIS shall predict the lifespan of the undertaking and present an approach for decommissioning, which sets out a commitment from the Proponent to address:

- a) expected useful life and life cycle management plans for Project infrastructure; and
- b) proposed decommissioning schedule and activities, including dismantling and removal of Project components, infrastructure and facilities (e.g., access roads, water crossings, tailings management, water management infrastructure, transmission lines, laydown areas). Schedule and activities should also be included for site rehabilitation, including restoration of natural drainage, a seed collection schedule and a revegetation plan.

2.2.5 Greenhouse Gas Emissions

The EIS shall commit to the following:

- a) incorporating any additional GHG emissions associated with the Project into the facility's annual GHG reporting for all phases of the Project, including construction, operation and maintenance, and decommissioning and rehabilitation; and
- b) operating heavy equipment in a manner that maximizes fuel efficiency, thereby reducing GHG emissions that could contribute to climate change.

2.2.6 Regulatory Framework and Government Oversight

The EIS shall provide a comprehensive list of permits and regulatory approvals (municipal, provincial, and federal) required by law for the undertaking. The list shall include, but not be limited to, the following details:

- a) activity requiring regulatory approval;
- b) name of permit, licence or regulatory approval;

- c) name of legislation applicable in each case; and
- d) regulatory agency responsible for each permit, licence, and approval.

3 ALTERNATIVES

3.1 Alternatives to the Undertaking

The EIS shall include a detailed analysis of the advantages and disadvantages to the environment of the undertaking as proposed, an analysis of the alternatives to the undertaking, and a summary with clearly described methods and sufficient information to justify the selection of the preferred alternative and an explanation for rejecting other alternatives. This subsection shall include a comparative analysis of the environmental effects and technical and economic feasibility of alternatives that led to the selected Project alternative. The Proponent shall consider describing:

- a) functionally different methods of meeting the Project need and achieving the Project purpose; and
- b) market and regulatory circumstances that may have influenced the preferred alternative.

3.2 Alternative Methods of Carrying Out the Undertaking

The EIS shall identify and consider the environmental effects of alternative methods of carrying out the undertaking that satisfy the need for the undertaking. The preferred alternatives shall be identified with the selection based on clearly described methods. An explanation shall be included of how environmental factors affect the design and consideration of alternatives.

The EIS shall provide the rationale for selecting Project components and shall discuss the state of the art of the various technologies being proposed. In describing alternative means of carrying out the Project, the Proponent may consider, but not be limited to, a discussion of the following:

- a) alternative mine site layouts, pit configurations, and Project footprints designed to

avoid or increase setback distances from Shoal Cove Beach, Chambers Cove Trail, approved camping areas, residential areas, wetlands, watercourses, and other sensitive environmental, recreational, tourism, heritage, and cultural features; and

- b) alternative access roads, transportation corridors, and haul routes that maintain safe and uninterrupted public access to beaches, trails, tourism destinations, heritage sites and recreation areas, while minimizing conflicts between mine traffic and public users.

4 ENVIRONMENT

4.1 Key Issues

The Proponent shall identify the key issues related to the Project. The issues can be revised and adjusted in relation to the information acquired in the field and during public consultations held by the Proponent in the preparation of the EIS.

The selection of key issues shall consider, but not be limited to, the potential effects of the Project on:

- a) beaches, trails, recreation areas, and public access;
- b) air quality (dust) and daytime and night time lighting intensity;
- c) noise levels and vibration (blasting, equipment operation);
- d) surface water and groundwater;
- e) flora and fauna, including fish and fish habitat; and
- f) communities, human health and quality of life.

The remainder of Section 4 shall focus on the components relevant to the key issues and effects of the Project.

4.2 Existing Environment

Information provided in the Proponent's environmental assessment registration submission may be extracted and supplemented with the following information to describe

relevant aspects of the existing environment prior to implementation of the Project, which constitute the reference state of the environment. This section shall include a description of the existing bio-physical 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 valued environmental components (VECs). Existing environment information may be based on available published data and community consultation.

The EIS shall consider three spatial boundaries of Study Areas to describe the existing, pre-Project environment, as follows:

1. Project Area (PA): the Project footprint including all temporary and permanent areas associated with the Project;
2. Local Study Area (LSA): the area beyond the Project footprint where Project effects may extend; and
3. Regional Study Area (RSA): the larger area around the LSA (delineated by ecological, social, economic or other appropriate boundaries), including the region where cumulative effects may extend.

The following VECs have been identified for the Project, and the Proponent may include others, as may be determined during public consultation:

- a) atmospheric environment;
- b) aquatic environment;
- c) terrestrial environment;
- d) land and resource use;
- e) traditional, cultural and recreational resources;
- f) communities; and
- g) economy, employment and business.

The level of detail provided in sections 4.2.1 to 4.2.7 shall be sufficient to identify the beneficial effects of the Project, assess adverse environmental effects, develop mitigation measures and monitoring programs to determine the effectiveness of mitigation measures and enable effective follow-up.

4.2.1 *Atmospheric Environment*

The EIS shall describe the relevant components of the atmospheric environment within the Study Areas of the VECs including, but not limited to, the following:

- a) climate information, including monthly and annual minimum, maximum and mean values for precipitation, temperature and wind speed, prevailing wind direction, and storm events;
- b) provincial climate change projections for St. Lawrence (nearest regional site) and coastal sea level rise projections for the area;
- c) indications of recent climate change observations and trends;
- d) an assessment of ambient noise (including short duration and low frequency noise long-term), vibration and light from Project sources and at sensitive human and animal receptors, including but not limited to nearby residents at Pollux Avenue, Blue Beach Heights, Corporation Place, Director Drive and visitors to approved camping areas). The assessment shall include identification of Project sources, decibel/intensity levels, geographic extent and temporal variations and shall compare observed levels to acceptable standards; and
- e) an assessment of ambient air quality, including identification of sources of Project air emissions and dust lift off (e.g., diesel generators, heavy equipment, ground disturbance, gravel roads, laydown areas, stockpiles, etc.), at the Project site and at sensitive receptors, and a comparison of the observed air quality to acceptable standards.

4.2.2 *Aquatic Environment*

The EIS shall describe the relevant components of the aquatic environment within the Study Areas of the VECs including, but not limited to, the following:

- a) protected public water supply areas, protected wellhead areas, unprotected public drinking water source areas and private drinking water sources;
- b) water resource use in the Study Areas, including industrial water use;
- c) hydrologic/hydrogeologic characterization of the South Ridge Mine area including hydraulic characterization of significant hydrostratigraphic units and preferential

- flow paths such as fault and fracture zones;
- d) existing surface water quality in Shoal Cove Pond and Shoal Cove Brook;
 - e) commercial and recreational fisheries (freshwater and marine), including results from an up to date creel survey, in the Study Areas;
 - f) other marine recreational use;
 - g) fish species and associated habitat that may be affected by the Project, including identification of species of special concern, threatened and endangered as per the **Species at Risk Act (SARA)**, **Newfoundland and Labrador Endangered Species Act (NLESA)**, COSEWIC, and Atlantic Canada Conservation Data Centre (ACCDC) that are known to be present in the Study Areas;
 - h) whether the following species and their habitat are present in the Project Study Areas:
 - i) American eel;
 - ii) Atlantic salmon; and
 - iii) Banded Killifish.
 - i) a description of known regional aquatic invasive species and the risk of migration of aquatic invasive species into or out of the marine Project area; and
 - j) an assessment of critical and sensitive habitats and times of the year for spawning, nursing, rearing, feeding, and migration of fish species.

4.2.3 Terrestrial Environment

The EIS shall describe the relevant components of the terrestrial environment within the Study Areas of the VECs, including, but not limited to, the following:

- a) avifauna, including migratory birds protected by the **Migratory Birds Convention Act (MBCA)** (landbirds, shorebirds, seabirds and waterfowl). Birds protected under the MBCA are specifically named at <https://www.canada.ca/en/environment-climate-change/services/migratory-birds-legal-protection/list.html>. Other relevant datasets are available at Bird Studies Canada's "Nature Counts" web portal at <http://www.birdscanada.org/birdmon/default/datasets.jsp>; and

- b) avifauna, flora and fauna species at risk and species of conservation concern and their habitats within the Study Areas, including designated critical habitat under the **NLESA**, **SARA**, and areas of conservation concern (e.g., environmentally sensitive areas such as national, provincial, and regional parks and reserves, important bird areas near the Project area (Middle Lawn and Corbin Islands); Ecologically and Biologically Significant Areas (EBSA's); protected areas, conservation agreement lands, Municipal Habitat Stewardship Agreement areas, and habitat enhancement projects);
- c) Manx Shearwater, Leach's Storm Petrel and multiple species of shorebirds at risk, including Harlequin Ducks, Semipalmated Plover, Piping Plover, Sanderling, Caspian Tern, Snowy Owl, Short Eared Owl, American Kestrel, Liver Sided Flycatcher, Barn Swallow, Evening Grosbeak, Red Crossbill, and Rusty Blackbird; and
- d) endangered bats including the Little Brown Myotis, Northern Myotis, and Hoary Bat, and all mammals utilizing the area.

4.2.4 Land and Resource Use

The EIS shall describe relevant land and resource use within the Study Areas of the VECs, including, but not limited to, the following:

- a) existing electrical infrastructure;
- b) municipal boundaries;
- c) land tenure, including:
 - i. Crown lands;
 - ii. private lands;
 - iii. land and forest tenure under the **Mineral Act**, **Quarry Materials Act** and **Forestry Act**; and
- d) control monuments that form part of the provincial Geodetic Control Network.

4.2.5 Traditional, Cultural and Recreational Resources

The Proponent shall engage with the public, municipalities, local service districts, community groups, organizations and known user groups to gather information on land

use. The EIS shall describe relevant traditional, cultural and recreational resources in the Study Areas of the VECs, including, but not limited to, the following:

- a) natural attractions and recreational activities including beaches, scenic lookouts, provincial and private parks and campgrounds, historical sites, cabins, hiking and multi-use trails, hunting, fishing, swimming, berry picking, etc.;
- b) tourism operators, tourist accommodations, licensed outfitters and guiding operators; and
- c) landscapes and viewsapes, including the extent of developed and undeveloped land. A Viewsapes Analysis shall be provided in the EIS that assesses and illustrates the extent to which Project components will be visible to the public and evaluates the effectiveness of natural topographic features and proposed berms in screening the Project from public view. Particular consideration should be given to locations with higher visual sensitivity, including: the Town of St. Lawrence, Shoal Cove Beach, and Cape Chapeau Rouge Trial lookout. The assessment should identify potential visual effects at these locations and include representative visualizations, maps, or line-of-sight illustrations to demonstrate Project visibility under existing and proposed conditions.

4.2.6 Communities

The EIS shall describe relevant community elements in nearby municipalities, local service districts and unincorporated communities in the Study Areas of the VECs, including the following:

- a) population demographics and health status, including physical, mental, and social well-being;
- b) family life, recreation, and culture;
- c) education and training facilities and programs;
- d) housing, accommodations, and property values;
- e) fire and emergency services;
- f) public health care services and services provided by non-profit and community-based organizations including mental health and addiction services, social

programs, and other community services;

- g) municipal, government or non-government working groups or committees; and
- h) municipal infrastructure or services to be used by the Project and the capacity of the infrastructure and services to support the Project.

4.2.7 Economy, Employment and Business

The EIS shall describe relevant economy, employment and business elements in the Study Areas of the VECs, including the following:

- a) economy of the region;
- b) existing industries including, but not limited to:
 - i. tourism;
 - ii. traditional, cultural and recreational establishments;
 - iii. mining, mineral exploration and quarrying;
 - iv. commercial and recreational freshwater and marine fisheries;
 - v. other major employers;
 - vi. employment and the availability of skilled and unskilled labour in the region and in the province;
 - vii. employment equity and diversity including under-represented groups; and
 - viii. business capacity relative to goods and services.

5 ENVIRONMENTAL EFFECTS

5.1 Predicted Future Condition of the Environment if the Undertaking Does Not Proceed

The EIS shall describe the predicted future condition of the environment within the expected life span of the Project if the Project were not to proceed. The predicted future condition of the environment shall help to distinguish Project related effects from environmental change due to natural processes.

5.2 Predicted Environmental Effects of the Undertaking

Information provided in the Proponent's environmental assessment registration submission may be extracted and supplemented with the following information to provide an analysis of the predicted environmental effects of the Project on the VECs. Predicted environmental effects (positive and negative, direct and indirect, and short and long-term) on the existing environment, as described in section 4.2, shall be defined qualitatively and quantitatively (where applicable) for the following:

- a) human health and safety resulting from air quality and dust emissions; shared public and mine use of access road;
- b) tourism, recreation and public access (Shoal Cove Beach, Chambers Cove Trail, camping areas, Salt Cove and Shoal Cove);
- c) community wellbeing and quality of life (noise, vibration and blasting);
- d) surface water and groundwater quality and quantity resulting from water demand and usage; erosion and sedimentation; acid rock drainage and metal leaching potential from rock piles temporarily or permanently stored or otherwise used on site; water crossings, in water and near water works; and blasting operations;
- e) recreational waters (Shoal Cove Beach, swimming areas and fishing);
- f) existing tailings management facility dam;
- g) flora and fauna, including birds and bats;
- h) fish and fish habitat, including fish passage during increased flows from Hare Ears Pond into Salt Cove Brook during critical times of year (i.e. migration upstream to spawning grounds), and effects of in-water and, near water works, and land based blasting; and
- i) commercial, recreational fisheries.

5.3 Accidents and Malfunctions

The EIS will identify and describe the potential accidents and malfunctions related to all components of the Project, 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 those scenarios. The EIS shall 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, including any chemicals and/or additives used to mitigate effects. Potential accidents and malfunctions may include, but not be limited to the following occurrences:

- a) accidental spills of chemicals, pesticides or any potentially hazardous substance on land or in air or water;
- b) fire and explosions;
- c) traffic accidents;
- d) pit wall and waste rock dump failure;
- e) extreme precipitation event and sediment pond (berm/dam) failure; and
- f) wildlife emergencies/incidents requiring response.

The EIS shall assess the likelihood of occurrence and consequence severity of the accidents and malfunctions.

5.4 Cumulative Environmental Effects

The EIS shall identify and assess the Project's cumulative environmental effects. Cumulative effects are defined as changes to the environment and resident species and their habitat in the area due to the Project and combined with the effects of past, present, and reasonably foreseeable future planned projects and/or developments and activities in the area. An undertaking causes a cumulative effect if the potential impacts associated with the undertaking will cause an additive effect with other projects in the region and in consideration of climate change. A comprehensive examination of all cumulative effects within the Study Areas must be included. The EIS shall consider the cumulative environmental effects for the life of the Project where those overlap with those of previous and existing phases of the mine, other projects and activities within or near the Study Areas. Boundaries for assessing the cumulative effects of the Project in combination with other projects and activities that have been or will be carried out will generally be different

from (larger than) the boundaries for assessing the effects of the Project, and shall:

- a) identify and justify the environmental components that will constitute the focus of the cumulative effects assessment, including, but not limited to, air quality/dust control (e.g. potential effects on residents of the town of St. Lawrence and users of nearby recreational areas), water resources (e.g., Shoal Cove Beach and associated recreational use), sediment ponds and water discharge locations and receptors, - and roads and trails (e.g., recreational and other use). The Proponent's assessment should emphasize the cumulative effects on the main VECs that could potentially be most affected by the Project;
- b) present a justification for the geographic and temporal boundaries of the cumulative effects assessment;
- c) describe and justify the choice of projects and selected activities for the cumulative effects assessment, including blasting activities during construction and operation and of the Project; and,
- d) describe the mitigation measures and determine the significance of the residual cumulative effects.

5.5 Effects of the Environment on the Project

Environmental changes and hazards that may occur and may affect the Project shall be described (e.g., wind, severe precipitation events, flooding, wildfire, etc.). The EIS shall take into account the information gathered for Sections 4.2.1 a, b and c of the Guidelines, the potential influence of climate change scenarios (e.g., increased severity and frequency of storms and flooding, changes to precipitation quantity and recharge rates), as well as local knowledge. The influence that these environmental changes and hazards may have on the Project shall be predicted and described. The environmental effects that may occur as a result of the environment acting on the Project shall be assessed.

Provincial climate change projections for St. Lawrence (nearest regional site) should be considered in the preparation of the EIS.

6 ENVIRONMENTAL PROTECTION – MITIGATIONS AND PLANS

6.1 Mitigations

The EIS shall identify and discuss proposed measures that will be implemented to enhance beneficial effects of the Project, mitigate significant adverse effects, monitor the efficacy of mitigations, and apply adaptive management where mitigation efforts are ineffective. The rationale for and effectiveness of the proposed mitigation and enhancement measures shall be discussed and evaluated.

The EIS shall identify who is responsible for implementing the mitigation measures and the system of accountability, including the obligations of contractors and subcontractors. Avoidance of environmental effects through implementation of scheduling and siting constraints and pollution prevention opportunities shall be considered.

Mitigation measures and monitoring activities shall be described for the effects identified in sections 5.2 to 5.5 of the EIS during construction, operation and maintenance, decommissioning and rehabilitation.

6.2 Plans

Information provided in the Proponent's environmental assessment registration submission may be extracted and supplemented with the following information to provide stand-alone plans that address public concerns and ensure an efficient and effective response to aspects of the Project that could adversely affect the receiving environment:

6.2.1 *Emergency Response/Contingency Plan, including Wildlife Response Plan*

- a) Updated dam safety information shall be provided, including the following:
 - i) dam breach inundation mapping for all existing dams and new dams constructed under this project;
 - ii) an updated Operation, Maintenance and Surveillance (OMS) Manual and Emergency Preparedness Plan (EPP), as needed, to include dams from the Project; and

- iii) a commitment to carry out annual Dam Safety Inspections and provide the reports to the Water Resources Management Division of the Department of Environment, Conservation and Climate Change (including the 2025 Dam Safety Inspections report).
- b) a Wildlife Response Plan that considers the presence of wildlife in the area of an accident, malfunction or emergency and has defined procedures for mitigating adverse effects on aquatic, terrestrial and avian wildlife during such events, including, but not limited to, the following:
 - i) accidental spills and/or releases of chemicals, pesticides or any potentially hazardous substance on land or in water;
 - ii) wildlife emergencies/incidents; and
 - iii) breach of water management infrastructure such as dams and dikes.

6.2.2 *Water Management Plan*

Additional details are needed in the Water Management Plan to advise on how dewatering mine pit and stormwater drainage will be managed. A Water Management Plan specific to the Project may be provided as a stand-alone document or as an appendix to the EIS. An updated site-wide Water Management Plan may be required by the Minister at a later date.

6.2.3 *Erosion and Sediment Control Plan*

The EIS shall include an Erosion and Sediment Control Plan (ESCP) to describe the methods and devices implemented to minimize erosion and sediment loss from the site as a result of clearing and soil disturbing activities throughout site preparation, construction, operation and maintenance, and decommissioning and rehabilitation phases. The ESCP shall be developed in consideration of the erosion and sedimentation control techniques described in Section 3.1 of the Best Management Practices for the Protection of Freshwater Fish Habitat in Newfoundland and Labrador (DFO 2022), available at <https://www.dfo-mpo.gc.ca/pnw-ppe/ffhpp-ppph/publications/nfl-freshwater-protection-eau-douce-tnl-eng.html>.

6.2.4 *Public Participation Plan*

The EIS shall include a Public Participation Plan that describes how the public was or will be meaningfully engaged in the planning of all phases of Project (construction, operation and maintenance, decommissioning and rehabilitation) and how they will continue to be consulted throughout the life of the Project, including in the monitoring of environmental effects.

6.2.5 *Environmental Effects Monitoring Programs*

The Groundwater and Surface Water Monitoring Program shall include post closure monitoring plans and a commitment to conduct further water quality testing to include seasonal variations and lower laboratory detection limits for comparison with applicable regulatory guidelines.

7 **RESIDUAL EFFECTS AND DETERMINATION OF SIGNIFICANCE**

Residual effects are those adverse environmental effects which cannot be avoided or completely mitigated through, or that remain after, the application of environmental control technologies and best management practices. The EIS shall list and contain a discussion and evaluation of residual effects, and for ease of review, shall include a matrix of the environmental effects, proposed mitigations, and residual adverse effects.

8 **ASSESSMENT SUMMARY AND CONCLUSIONS**

The EIS shall summarize the overall findings of the environmental assessment, with emphasis on the key environmental issues identified. The EIS shall contain a concise statement for the overall conclusions relating to the significance of the residual adverse environmental effects and provide rationale for the conclusions.

9 **PUBLIC CONSULTATION**

Under section 58 of the **EPA**, during the preparation of an EIS, the Proponent shall provide an opportunity for interested members of the public to meet with the Proponent at a place adjacent to or in the geographical area of the undertaking, or as the Minister

may determine, in order to:

- a) provide information concerning the undertaking to the people whose environment may be affected by the undertaking; and
- b) record and respond to the concerns of the local community regarding the environmental effects of the undertaking.

Under section 10 of the Environmental Assessment Regulations, the Proponent shall notify the Minister and the public of a meeting/meetings scheduled with the public under section 58 of the Act, not fewer than 7 days before that scheduled meeting. A minimum notice period of 15 days is recommended.

The concerns raised during public meetings shall be presented and addressed in a separate chapter of the EIS document. Protocol for the public meeting shall comply with the legislation and with divisional policy included in Appendix A.

10 ENVIRONMENTAL PROTECTION PLAN

A proposed Table of Contents and an annotated outline for the EPP shall be presented in the EIS, which shall address the major construction, operations and maintenance activities, permit requirements, mitigation measures and contingency planning, as well as the Proponent's environmental policies and provincial and federal environmental legislation and policies.

11 REFERENCES

The Proponent shall prepare a complete and detailed bibliography of studies used to prepare the EIS. Supporting documentation shall be referenced in the EIS and submitted in separate volumes or attached as appendices to the EIS.

12 PERSONNEL

The names and qualifications of key professionals responsible for preparing the EIS and supporting documentation shall be included. A description of the qualifications of scientists conducting surveys and scientific studies associated with the undertaking shall

be provided.

13 COMMITMENTS MADE IN THE EIS

The EIS is a statement of the Proponent's environmental conclusions and commitments related to the Project and must be explicitly endorsed by the Proponent. The EIS shall provide a list of all commitments made regarding environmental effects mitigation, monitoring and follow-up. Each commitment must be cross-referenced to the Section and subsection of the EIS where it has been made.

14 COPIES OF REPORTS

The EIS shall be prepared in accordance with the Guidelines and once completed, the Proponent shall submit an electronic copy of the EIS to Department of Environment, Conservation, and Climate Change (ECC), along with one electronic copy of the Plain Language Summary. All plans required by section 7 of the Guidelines and any stand-alone studies or documents associated with the EIS shall be included in the body of the EIS or as appendices.

The Minister reserves the right to request additional electronic copies and paper copies, if required.

The Proponent shall make printed copies of the Plain Language Summary, referenced in Part 3 of the Guidelines, available at accessible locations or viewing centers in the Project vicinity, as directed by ECC, and may be required to make printed copies of the entire EIS available in publicly accessible locations, as determined by ECC.

APPENDIX A

Requirements For Public Meetings/Information Sessions

Purpose of this document: to clarify for proponents and the public, the format, scheduling, number, notification requirements, etc. for public consultations in relation to undertakings required under the **Environmental Protection Act**, SNL 2002 cE-14.2, (section 58) to prepare an Environmental Impact Statement (EIS).

- a) The Proponent is required to conduct a public meeting/ information session under an EIS process as specified in the legislation. This requirement is specified in the Project EIS guidelines.
- b) A public meeting shall normally be held in the largest local population centre within the Project area. This shall be the minimum requirement. In addition, when demonstrated public interest or concern warrants, additional meetings may be required. This may take the form of additional meetings to be held in major regional or provincial population centres, or possibly additional meetings within the local population centre.
- c) The format of the public meeting is flexible, and the Proponent is free to propose a suitable format for approval by the Environmental Assessment Division. The format may range from formal public meetings chaired by the Proponent or designate with a presentation followed by questions and answers, to a less formal open house forum where the public may discuss the proposal with the Proponent or representatives. Other formats may be considered by the EAC. The purpose of the public information session is to provide information concerning the proposed undertaking to those who may be affected, and to record the concerns of the local community regarding the undertaking. Any format must meet these objectives.
- d) The Proponent must ensure that the public receives sufficient notification of each public meeting. The measures taken by the Proponent to notify the public must be described in the EIS. Sample of a notice is provided below (Proponent to substitute appropriate information for italicized items).

PUBLIC NOTICE

Public Information Session on the Proposed

Name of undertaking

Location of undertaking

shall be held at

Date and Time

Location

This session shall be conducted by the Proponent,
Proponent name and contact phone number or email address,
as part of the environmental assessment for this Project.

The purpose of this session is to describe all aspects of the proposed Project and the activities associated with it, and to provide an opportunity for interested persons to request information or state their concerns.

ALL ARE WELCOME

PUBLIC ADVERTISEMENT MAY BE COMMUNICATED VIA:

- print ads in community and local newspapers;
- posters displayed in prominent community locations, e.g., municipal buildings;
- Proponent/community websites, etc.;
- social media;
- local radio public service announcements;
- direct mail inserts or household drop offs to local residents; and/or
- other resources available in the area.

Public advertisements must be posted continually for not less than seven days (recommend 15 days) prior to each session. Any deviation from these requirements for any reason must receive the prior written approval of the Minister. The Proponent must provide the EAC chair with copies of public advertisements. The onus is on the proponent to sufficiently notify the public of upcoming meetings.