



Great Atlantic Salt

Wetland Conservation Plan

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Atlas Salt Inc.

Atlas Document No.:

Effective Date:
March 26, 2025

Signature Date:
March 26, 2025

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Revision History

Version	Author/Reviewer	Notes/Comments	Date
1.0	Colin Taylor - Author / Andrew Smith - Approver	Approved Version 1.0 - Draft to Regulator for Review	March 26, 2025



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Acronyms and Definitions

Acronym/Word	Title or Definition
Catchment ditch	Ditching inside the mine surface site that will capture water from the various onsite features and direct the water into an onsite settling basin
DEM	Digital Elevation Model
Diversion ditch	Ditching outside of the mine surface site that will direct water from land adjacent and outside of the mine surface site around the site and disperse at intervals outside of the mine surface site
DFO	Department of Fisheries and Oceans, Government of Canada
Drainage Basin	Area within which surface water drainage will occur and is topographically constrained from other areas
Drainage Channel	Path that water will travel over land (excluding ponds/lakes and watercourses)
EA	Environmental Assessment
EAR	Environmental Assessment Registration
EPP	(Atlas GAS Early Works) Environmental Protection (and Mitigation) Plan
GAS	Great Atlantic Salt
km ²	Square kilometer
m ²	Square metre
NL	Newfoundland and Labrador
NLDECC	Newfoundland and Labrador Department of Environment and Climate Change
Ponds/Lakes	a surface source of fresh water within the jurisdiction of the province, whether that source usually contains liquid or frozen water or not, and includes water above the bed of the sea that is within the jurisdiction of the province, and is a lake, pond, lagoon, ravine, gully, canal, and other standing water and the land occupied by that body of water. Typically, a Water feature that appears as



	<p>polygon on an NTS (National Topographic Series) map and includes ponds, lakes, and water reservoirs.</p>
Surface drainage boundary	<p>Boundary of drainage basin. Boundary that defines an area within which surface water drainage will occur and is topographically constrained from other areas</p>
TDS	<p>Total Dissolved Solid</p>
TSS	<p>Total Suspended Solid</p>
Waterbody	<p>(Statutory definition from the Act) “body of water” means a surface or subterranean source of fresh or salt water within the jurisdiction of the province, whether that source usually contains liquid or frozen water or not, and includes water above the bed of the sea that is within the jurisdiction of the province, a river, stream, brook, creek, watercourse, lake, pond, spring, lagoon, ravine, gully, canal, wetland and other flowing or standing water and the land occupied by that body of water.</p>
Watercourse	<p>Fresh water within the jurisdiction of the province, whether that source usually contains liquid or frozen water or not, and includes water above the bed of the sea that is within the jurisdiction of the province and is a river, stream, brook, creek, or watercourse. Typically, a linear feature on a 1:50,000 NTS map that connects to a pond/lake or wetland. Watercourses are typically characterized by waterflow year-round.</p>
Wetland	<p>Statutory definition from the Act: “wetland” means land that has the water table at, near or above the land surface and includes bogs, fens, marshes, swamps and other shallow open water areas</p>
WCP	<p>(Atlas GAS Early Works) Wetland Conservation Plan</p>
WRMD	<p>Water Management Resources Division, Department of Environment and Climate Change, Newfoundland and Labrador</p>
WRMP	<p>(Atlas GAS Early Works) Water Resources Management Plan</p>



1 Introduction

This Wetland Conservation Plan (WMP) establishes the approach by which Atlas Salt Inc. (Atlas) will protect, conserve, and, where necessary, mitigate impacts to wetlands during the Early Works phase of the Great Atlantic Salt (GAS) Project. Developed in accordance with federal and provincial regulations, this Plan builds on the Project's overall environmental commitments, outlining key strategies to manage site runoff, minimize disturbance to surrounding wetland habitats, and maintain ecological integrity. The Plan also integrates with Atlas GAS's Early Works Environmental Protection and Mitigations Plan (EPP) and Early Works Water Resources Management Plan (WRMP) to ensure all wetland-related activities are coordinated, consistently applied, and clearly documented throughout construction.

1.1 Overview of Atlas Great Atlantic Salt Project

Atlas Salt Inc. (Atlas) is proposing to develop the Great Atlantic Salt Project (GAS Project), located on the west coast of the Island of Newfoundland within the municipal boundaries of the Town of St. George's.

The Project will produce and export crushed salt for the road de-icing market, with an initial production capacity of 2.5 million tonnes of rock salt per year. The GAS Project will extract underground salt ore that is approximately 96% pure using electric continuous miner excavation. The ore will be crushed underground using conventional dry crushing and screening methods in three crushing stages and four screening stages. All processing activities will be completed underground.

The final salt product will be conveyed from the underground mine to the surface mine site then overland on a covered or enclosed conveyor to the Turf Point storage and Marine Terminal facility. From there, it will be loaded onto ships for destination markets in the Maritime Provinces, Quebec and Eastern United States.

The proposed development is located in Western Newfoundland, within the town limits of St. George's. The approximate central point of the Project Area is at longitude 58.49184, latitude 48.41892, or 387,550 E, 5,362,650N (NAD83 Zone 21 North).

The core components are presented Figure 1 and include:

- An underground salt mine and ore processing (crushing and screening) facilities
- Mine site surface infrastructure



- An overland conveyor system routed along the existing Flintkote Road
- Use of the existing Turf Point marine facility, with some planned modifications and upgrades to the storage facilities
- Associated, ancillary infrastructure including access roads, water and sewer systems, and power supply

Commencing Q4 2024 with detailed permitting, engineering and the procurement of key long-lead components, the current Project schedule would see construction activity in the field beginning in Q2 2025 and continuing year-round. The operations phase of the Project will commence upon completion of construction and associated commissioning, with initial (capital development) mining commencing in Q4 2025 and extending to approximately Q2 2029. This will be followed by the installation of underground infrastructure, after which mine production will ramp up to commercial production levels in Q4 2029 and extend for an operational period of at least 34 years. Progressive rehabilitation activities will occur throughout the life of the mine with final closure and rehabilitation activities after the operations have ceased. The current project schedule is presented in *Figure 2*.

1.2 Company Information

Atlas owns 100 percent of the Great Atlantic salt deposit, North America’s premier undeveloped salt project, which is strategically located on the west coast of Newfoundland.

Atlas is a Canadian-based resource development company listed on the Toronto Venture Exchange under the trading symbol SALT (TSXV:SALT) and headquartered in St. John’s Newfoundland and Labrador. Atlas is the 100% owner of the Great Atlantic Salt Project.

Name of Corporate Body	Atlas Salt Inc.
Address	100 New Gower Street, Suite 910 St. John's, Newfoundland and Labrador Canada A1C 6K3 Tel (709) 754-3186 Email. info@atlassalt.com
Chief Executive Officer	Patrick Laracy CEO and Chairman



Principal Contact Person for Engineering and Construction	Robert Booth, Vice-President, Engineering
Principal Contact Person for Corporate Issues	Alasdair Federico Vice-President, Corporate Affairs

Additional information on Atlas can be found at: [AtlasSalt.com](https://atlasalt.com)



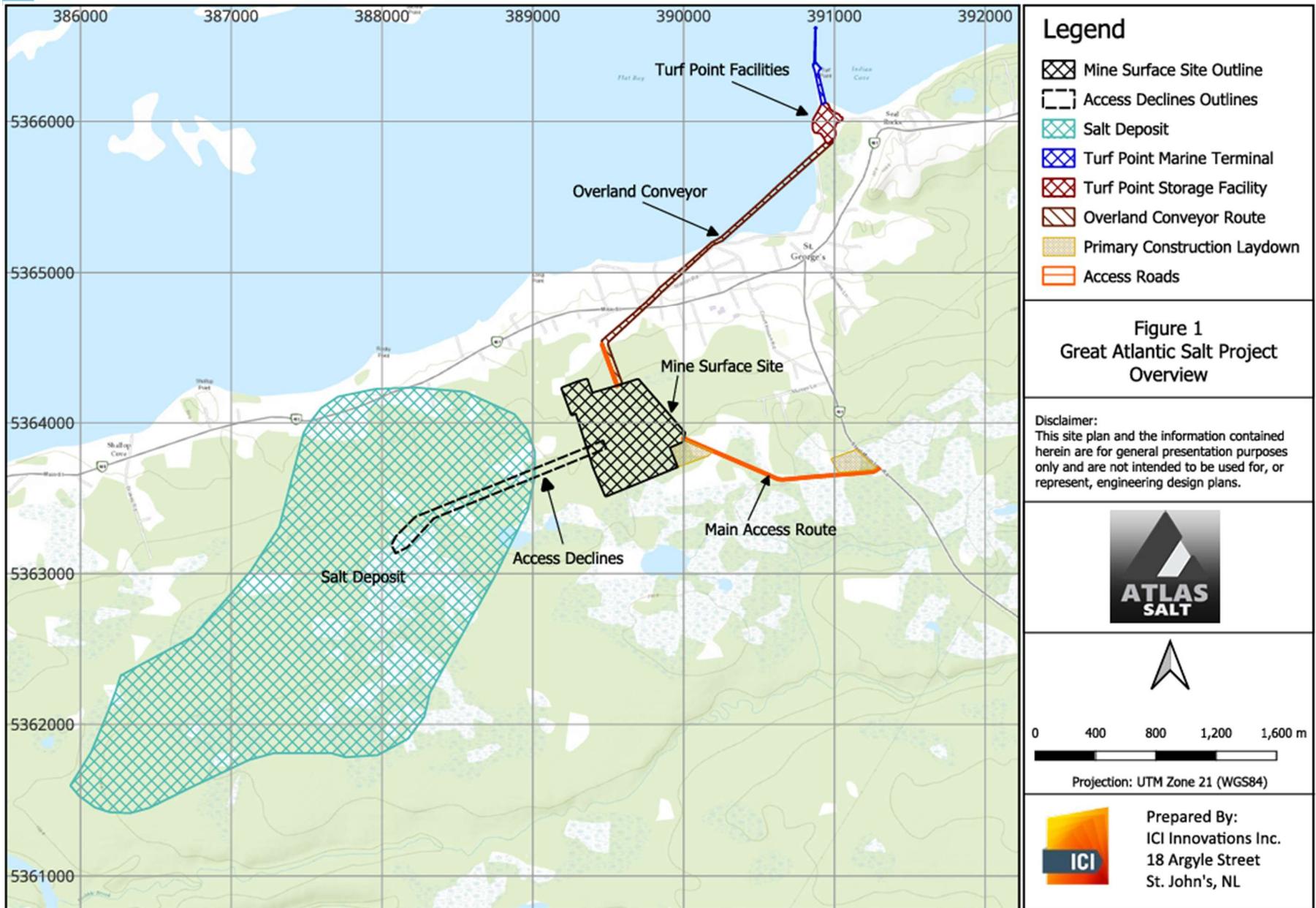


Figure 1: [Great Atlantic Salt Project Overview](#)



1.3 Rationale for Current Activities

Atlas completed a feasibility study in 2023 (SLR, 2023) and submitted the required Environmental Assessment (EA) Project Registration in February 2024 (NLDECC, 2024). The project was subsequently released from EA April 19, 2024. Atlas has defined a construction plan to achieve salt production and start of mine ramp up by Q2 2029 (Figure 2).

This plan sees construction completed in phases with a pre-early works phase completing land acquisitions, permitting, and surveying; an early works construction phase including surface earthworks, roads, terrace construction, stockpile foundations, onsite catchment ditching and peripheral berms / diversions ditching and fences. Subsequent phases will include site infrastructure, power, water and sewer, and then a capital construction phase commencing later in 2026. The early works construction phase does not include any underground, conveyor, storage or marine terminal components (Figure 3). By the end of Q3 2025, a full development and rehabilitation and closure plan will be submitted to address the full project construction, operation, closure and post-closure phases of the project.

As part of the release of the Atlas Salt GAS Environmental Assessment Registration, the Water Resources Management Division (WRMD) of NLDECC required Atlas to produce a Wetlands Conservation Plan that includes encroachment prevention procedures to prevent indirect effects to wetlands around the Project area. Elimination of a section of the wetlands complex is inevitable, however this document outlines a conservation plan for the remaining wetland areas, particularly along the periphery of the ancillary facilities, to protect them from further disturbance.

This document covers the early works activities of the project. It is anticipated that the wetlands conservation practices and policies required for the Project is largely associated with the early works activities, and, as such, it is anticipated there will be minimal alterations to the document for subsequent phases of the project. However, this document will be reviewed as each phase of the Project approaches and Atlas will acquire either confirmation by the Water Resources Management Division that no alteration of the Wetland Conservation Plan is required, or an updated version of the Wetland Conservation Plan will be submitted and approved.

It should be noted that the overall project schedule is subject to change based on several factors, but at the time of submission this is the most current



schedule to date. Early Works Activities are currently identified to occur within April 9th, 2025, to April 16th, 2026.

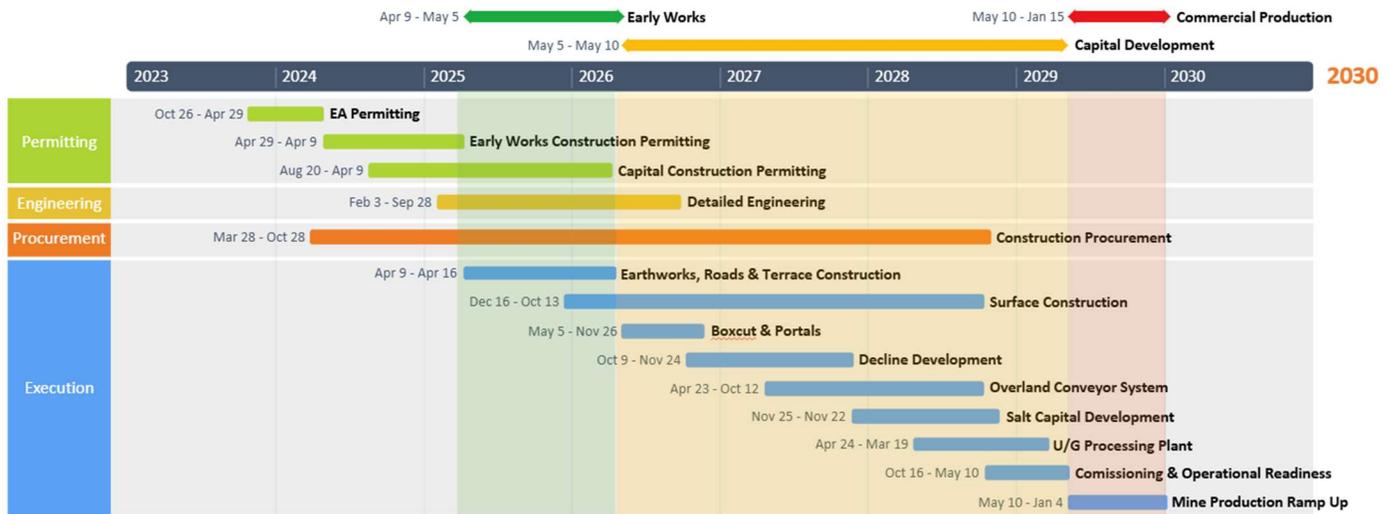


Figure 2: High Level Schedule

1.4 Overview of Early Works Activities

This Wetland Conservation Plan covers the early works development that includes the components listed below and presented in Figure 3. The area of disturbance of the early works activities is presented in Figure 4 and summarized in *Table 1*:

- a) Clearing of Site: Grubbing and Overburden
- b) Provincial Road Access
- c) Primary Access Road
- d) Construction Laydown Areas
- e) Temporary Construction Facilities
- f) Temporary sediment and erosion control
- g) Terraces
- h) Life of Mine Stockpile Foundations for the organic, waste and pre-production stockpiles
- i) Onsite Catchment Ditches
- j) Secondary Access Road
- k) Onsite Roads
- l) Peripheral berms / diversion ditches and fencing



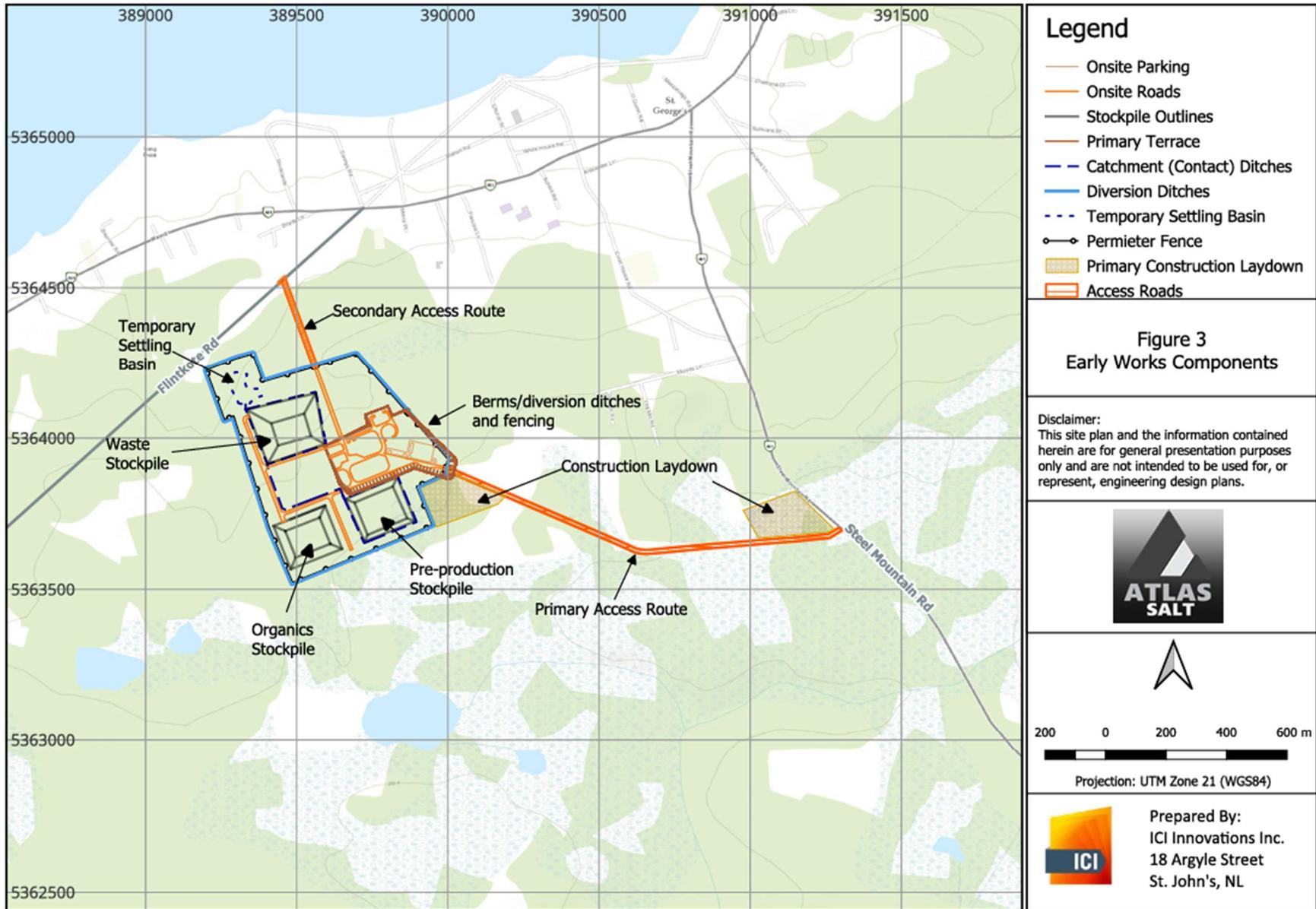


Figure 3: [Early Works Components](#)



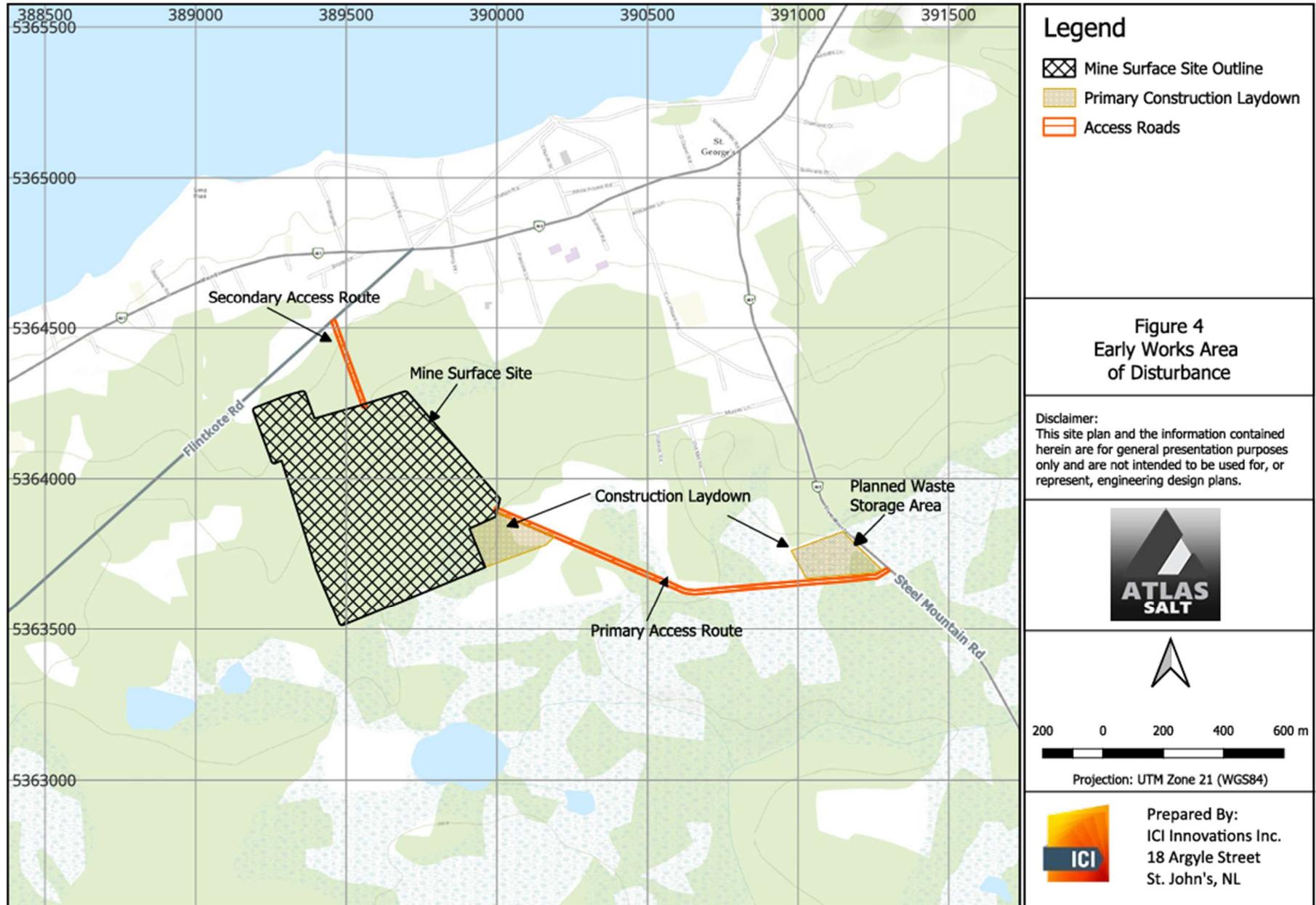


Figure 4: [Early Work Area of Disturbance](#)



Table 1: Summary of Area of Disturbance

Activity	Area of Disturbance m ²	Tree Clearing m ² (%)
Primary Road Construction	24,500 m ²	1.0 Ha (41%)
Construction Laydown Areas	51,000 m ²	2.27 Ha (45%)
Secondary Road Construction	6,000 m ²	0.6 Ha (100%)
Surface Mine Site Construction	389,000 m ²	27 Ha (69%)
Totals	470,500 m²	29.97 Ha

1.5 Project History and Current State

The following table summarizes the major milestones completed to date on the Project.

Table 2: Summary of Relevant Project Milestones

Milestone	Date Completed/Planned Submission
Technical Report on the Great Atlantic Salt Project, Newfoundland and Labrador, Canada Report for NI 43-101 (SLR, 2023)	October 2023, Amended May 2024
Atlas Great Atlantic Salt EA Registration (NLDECC, 2024)	February 2024
Release from EA Registration	April 19, 2024
Mineral Lands Mining Lease Signed (GNL, 2024a)	October 24, 2024
Mineral Lands Surface Lease Signed (GNL, 2024b) (GNL, 2024c)	October 24, 2024
Early Works Waste Management Plan Submitted	January 14, 2025
Early Works Environmental Protection Plan Submitted	January 14, 2025
Early Works Waste Management Plan Accepted	January 15, 2025
Early Works Mine Development and Rehabilitation and Closure Plan Submitted	February 28, 2025
Early Works Bat Preventative Measures Plan Submitted	March 24, 2025

2 Existing Physical Environment

This section provides a detailed overview of the natural setting in which the Great Atlantic Salt (GAS) Project’s Early Works are planned. It begins by describing nearby ponds/lakes and watercourses, followed by assessments of local flooding risks, proximity to protected water supplies, and overall terrain characteristics. Understanding these baseline conditions is crucial for accurately identifying potential interactions between project activities and environmental features, particularly wetlands, and for applying the appropriate mitigation and protection measures outlined in subsequent sections.



2.1 Ponds/Lakes and Watercourses

Waterbodies include ponds/lakes, rivers/streams/brooks and wetlands. The following section outlines the ponds/lakes and watercourses that exist within project area of disturbance. Wetlands are covered in Section 2.5.

2.1.1 Ponds/Lakes

There are no ponds/lakes within the boundaries of the early works project, however there are a number of small ponds within approximately 1km of the areas of activity. *Table 3* and *Figure 5* provide a summary of ponds near the areas of activity.

Table 3: Ponds/Lakes in the Project Area

Ponds/Lakes	Area	Nearest Project Feature	Location
Burnt Wood Pond	53,500 m ²	Mine Surface Site	433m SSE of Mine Surface Site
Unnamed Pond 1	25,000 m ²	Mine Surface Site	528m WSW of Mine Surface Site
Unnamed Pond 2	7700 m ²	Mine Surface Site	337m WSW of Mine Surface Site
Unnamed Pond 3	6500 m ²	Primary Access Road	754m SSW of Primary Access Road
Unnamed Pond 4	8300 m ²	Primary Access Road	809m SSE of Primary Access Road
Unnamed Pond 5	5100 m ²	Construction Laydown	1.08km S of Primary Access Road

2.1.2 Watercourses

There are no watercourses (rivers/streams/brooks) within the boundaries of the early works project area, however there are 5 streams near the early works areas of activity. *Table 4* and *Figure 6* provide a summary of the streams near the areas of activity.

Table 4: Watercourses in the Project Area

Stream	Comments	Distance and Location
Man O'War Brook	Intermittent stream with minimal summer water flow Stream is a maximum 1m width with <10cm depth	50 meters west of the surface mine site
Dribble Brook	A tributary of Flat Bay Brook, up to 20m wide Licensed salmon river	1300 meters south of primary access route and 1600 meters southeast of surface mine site



Intermittent Tributaries of Dribble Brook	Appear to show limited seasonal water flow	490 meters southeast of the surface mine site and 380 meters S of the primary access route
Flat Bay Brook	Over 100m width in places Licensed Salmon River	2750 meters south of the surface mine site and 3100 meters southwest of the primary access route
Little Barachois Brook	Up to 50m width Licensed Salmon River	3550 meters northeast of the primary access route and the construction laydown area 4350 from the surface mine site



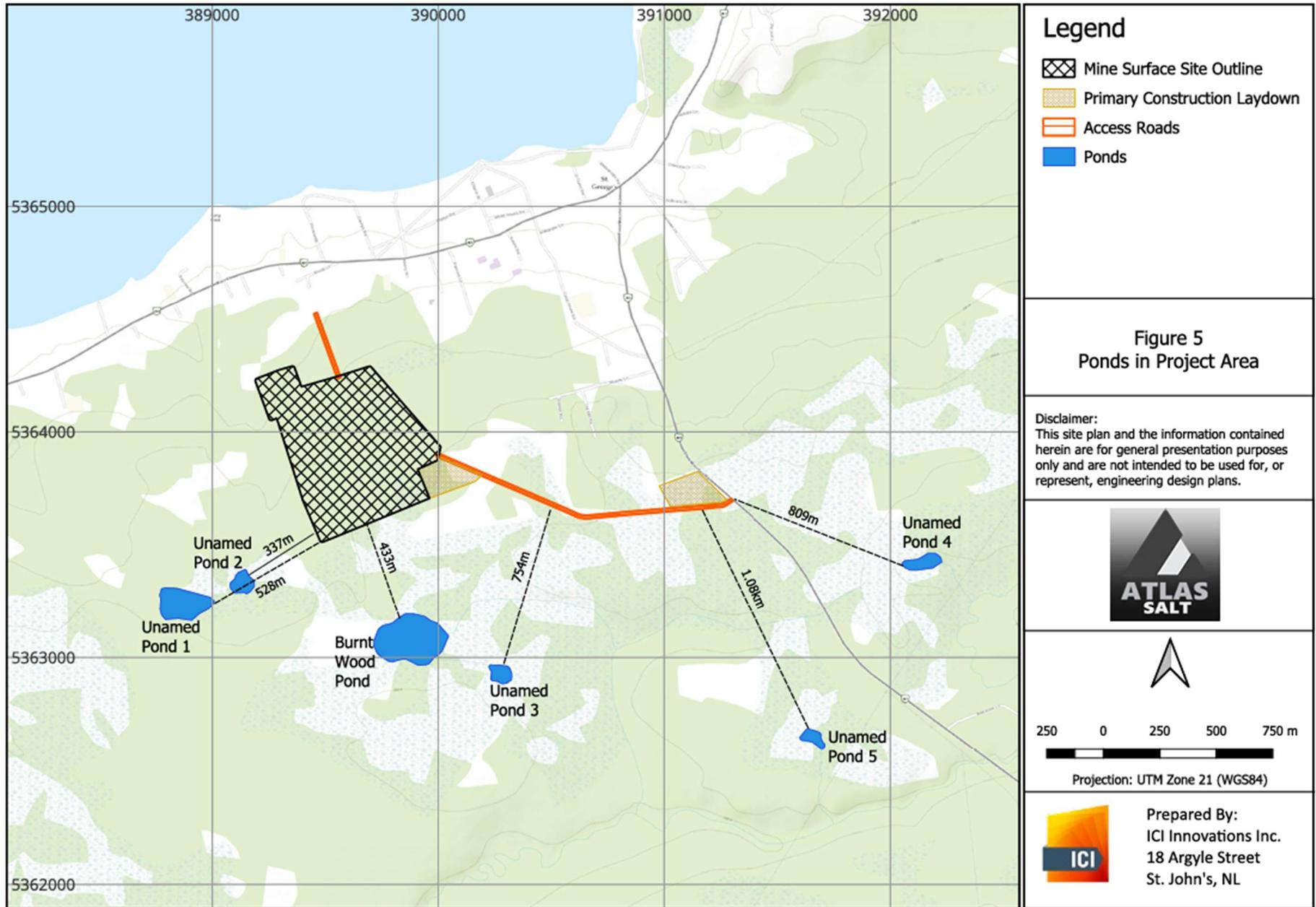


Figure 5: Ponds in Project Area



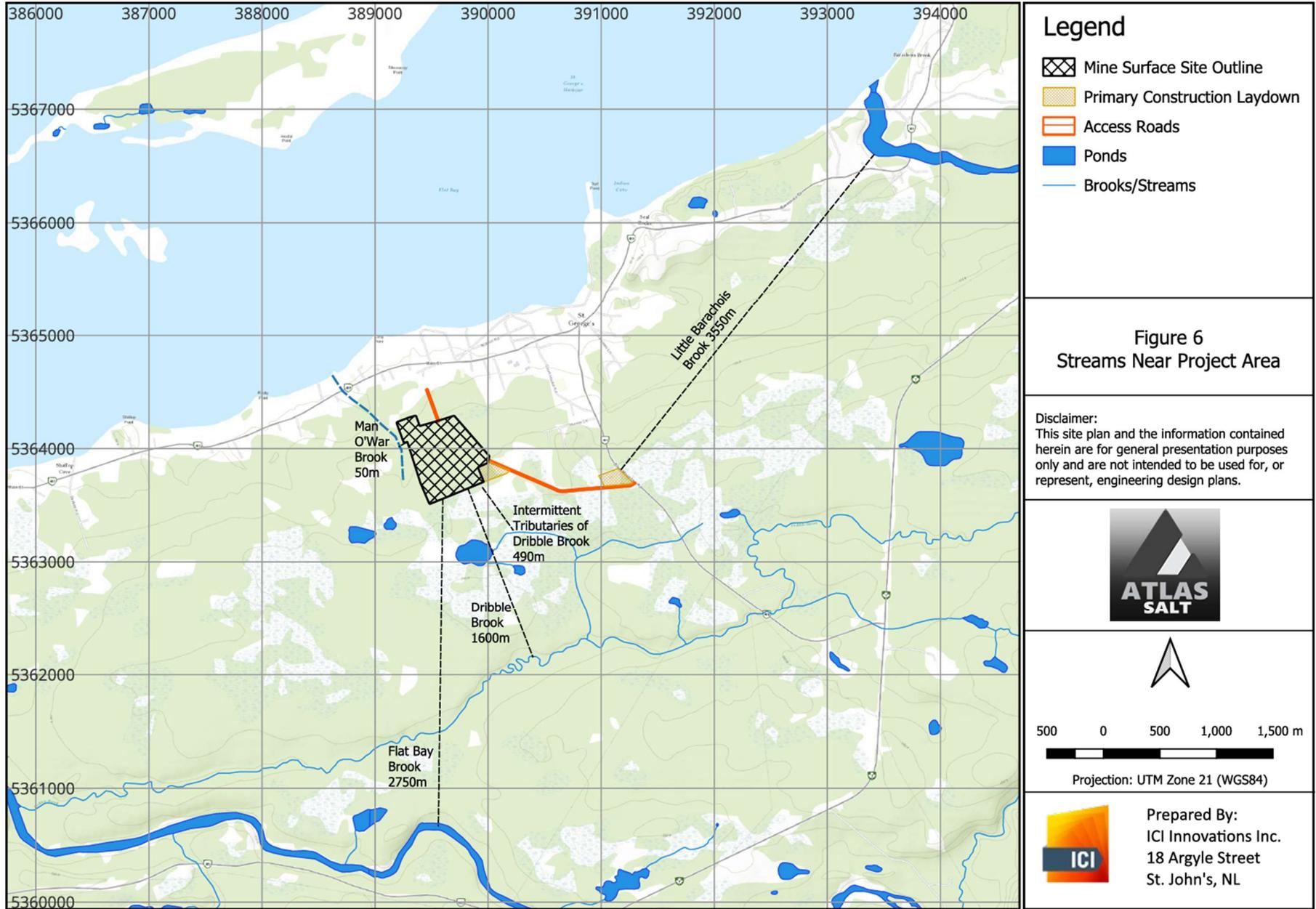


Figure 6: Streams Near Project Area



2.2 Flooding and Flood Risk

A review of the Newfoundland and Labrador Department of Environment and Climate Change (<https://www.gov.nl.ca/ecc/waterres/flooding/>) flood risk mapping and related studies indicates there is no risk of flooding related to rainfall, coastal storm surge, ice jam, or snowmelt within the early works area of disturbance, or the wetlands areas in the project area.

The settling basin proposed is a below ground (dug) basin with a berm of less than 1m. It is anticipated that there is no risk of flooding from the settling basin. Settling basin plans are detailed in the *Atlas GAS Early Works Water Resources Management Plan* (Atlas, 2025b).

2.3 Proximity to Water Supply and Wells

The early works activities do not overlap the protected water supply areas. There are two protected water supplies in the region (*Figure 7*). These two protected water supplies are 850m and 500m from where the primary access route leaves Steel Mountain Road. Additionally, there are no domestic wells within the early works activity area. The only known domestic well is 1240 meters away from the early works activities (*Figure 7*).

2.4 Topography and Surface Water Drainage

The early works activities all occur in the project area between Steel Mountain Road and Flintkote Road (See *Figure 3* above). The site is characterized by a continuous low slope with very little undulation across the area. The topography generally slopes from a high point where the primary access route leaves Steel Mountain Road, towards the northwest (*Figure 8*).

Directly to the south of the Project site there is a ridge line (See Ridge Line marked in *Figure 8*) that runs east to west. The area to the north of this ridge line faces north and generally slopes towards the ocean and across the mine site. The area to the south of the ridge line generally slopes to the south towards the intermittent streams that flow seasonally to the south through a flat section of land that drains into Dribble Brook.

Using the detailed elevation data produced from LiDAR data captured in the summer of 2022 (Pioneer Exploration, 2022) the surface flow patterns were determined in the project area. The drainage channels in *Figure 9* depict the areas where water will flow over the mine surface site. Using the drainage channels and the detailed elevation data, the Project area can be delineated into a series of drainage basins.



Figure 9 depicts the resulting drainage basins within and near the early works project area. These basins are summarized in *Table 5*. Of the 7 drainage basins identified, Basin 1, Basin 2, Basin 3, and Basin 6 overlap the early works activities. Basin 2 captures an area that crosses the primary access road and the construction laydown area adjacent to Steel Mountain Road. Basin 3 captures an area that drains across the mine surface site, 865 meters of the primary access road, and the construction laydown adjacent to the mine surface site. Basin 6 captures an area that partially drains across the mine surface site. The secondary access road is within Basin 1. Basins 4, 5 and 7 are not affected by the early works activities.

Table 5: Drainage Basins in the Project Area

Basin ID	Surface Flow	Project Area Components
Basin 1	Surface flow is to the north of the Project Area, across the residential land of Parsons Road and Muisés Lane	Secondary access road
Basin 2	East of the surface mine site, surface flow is generally north and towards Steel Mountain Road	Primary access road
Basin 3	Sloped from east to west across the surface mine site	This basin flows across the surface mine site and includes a portion of the primary access road
Basin 4	Surface water flows south from the ridge line identified in Figure 8, into tributaries that feed Dribble Brook	NO early works project components within this drainage basin
Basin 5	Surface water flows south and west from the ridge line identified in Figure 8, and feeds Man O'War Brook	NO early works project components within this drainage basin
Basin 6	Surface water flows into Man O'War Brook from the southwest corner of the surface mine site	The basin flows across the southwest corner of the surface mine site
Basin 7	Surface water flows west of Man O'War Brook away from all project activities	NO early works project components within this drainage basin



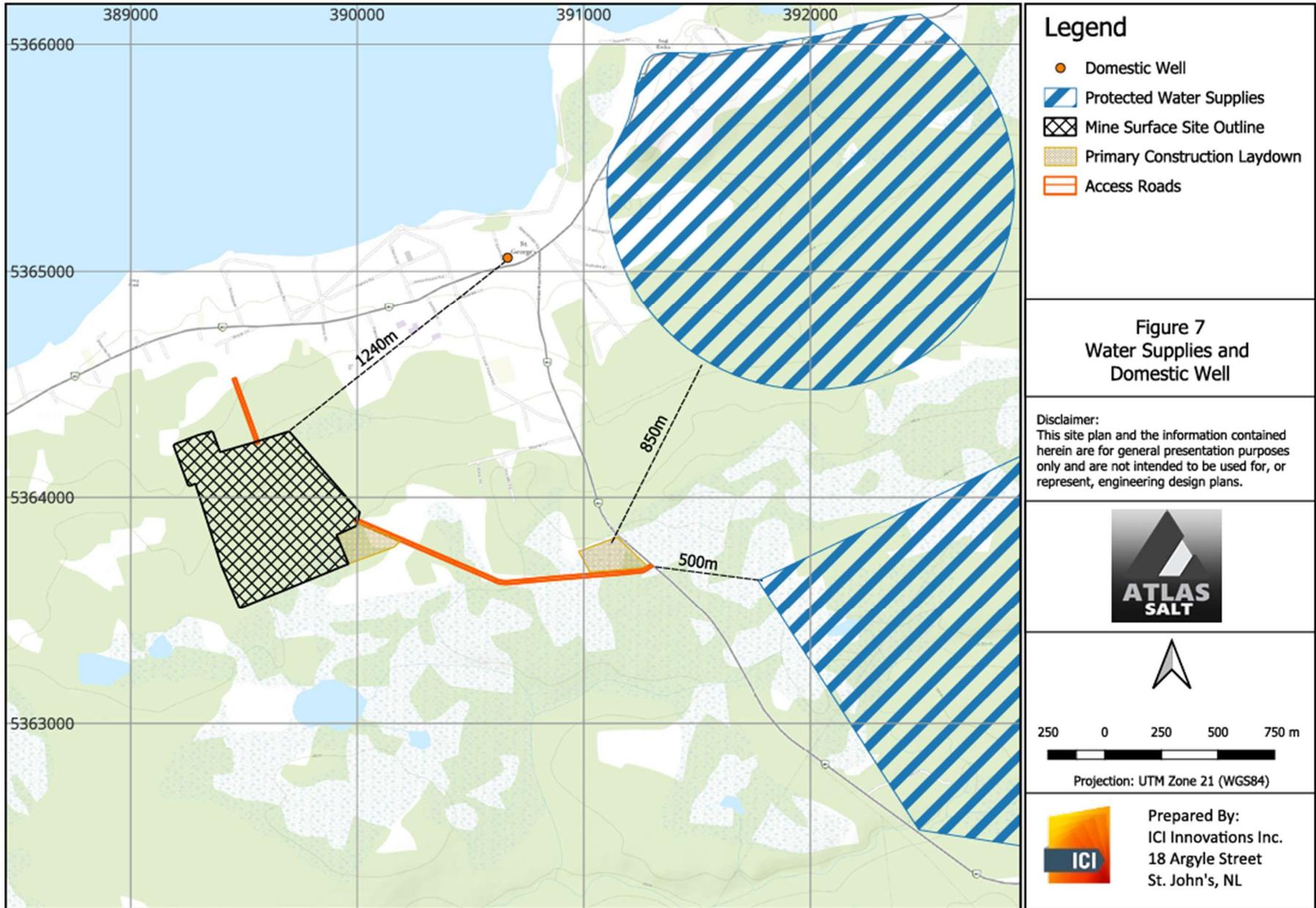
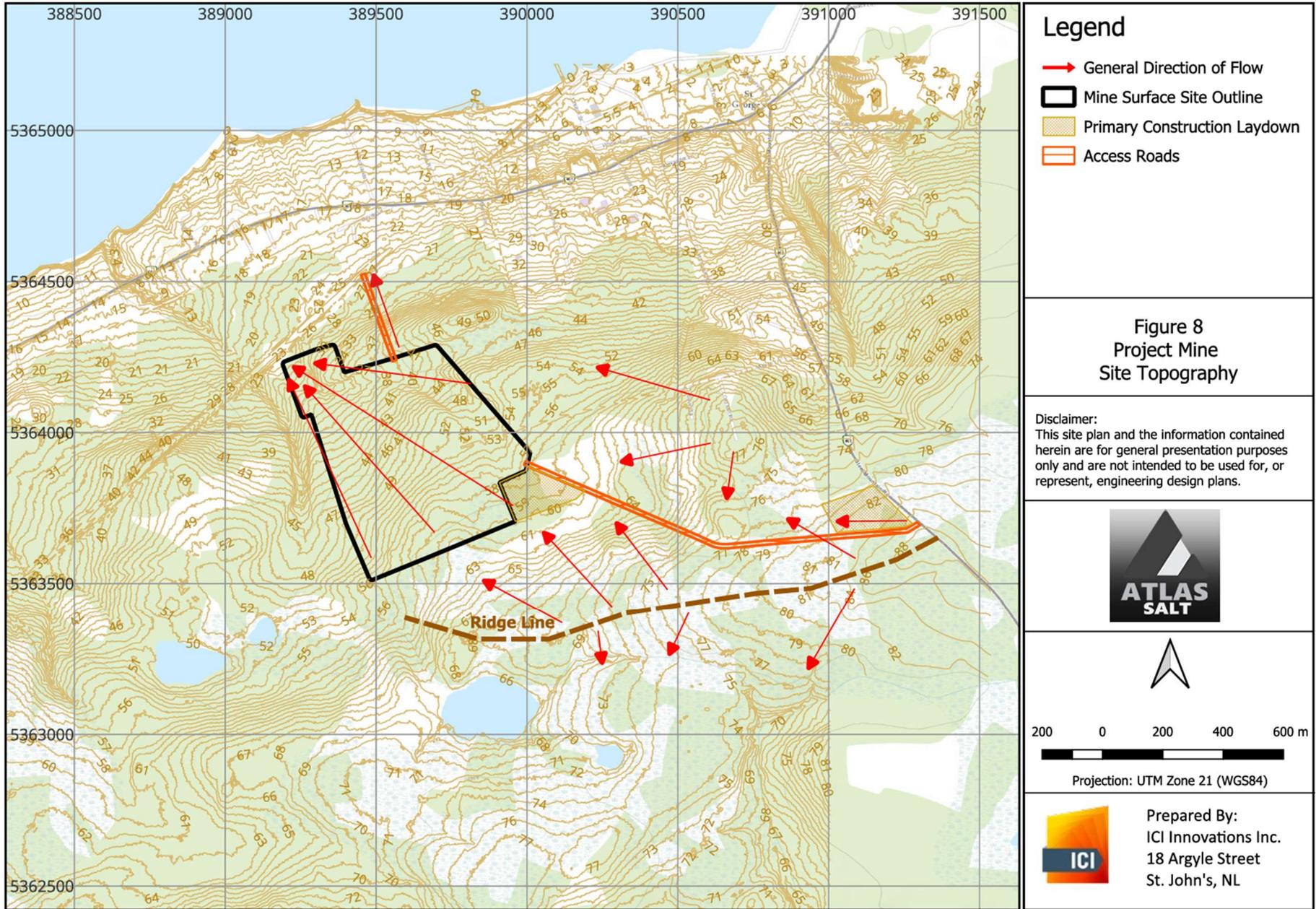


Figure 7: Water Supplies and Domestic Well





Legend

- General Direction of Flow
- Mine Surface Site Outline
- Primary Construction Laydown
- Access Roads

**Figure 8
Project Mine
Site Topography**

Disclaimer:
This site plan and the information contained herein are for general presentation purposes only and are not intended to be used for, or represent, engineering design plans.



200 0 200 400 600 m

Projection: UTM Zone 21 (WGS84)

Prepared By:
ICI Innovations Inc.
18 Argyle Street
St. John's, NL

Figure 8: [Project Mine Site Topography](#)



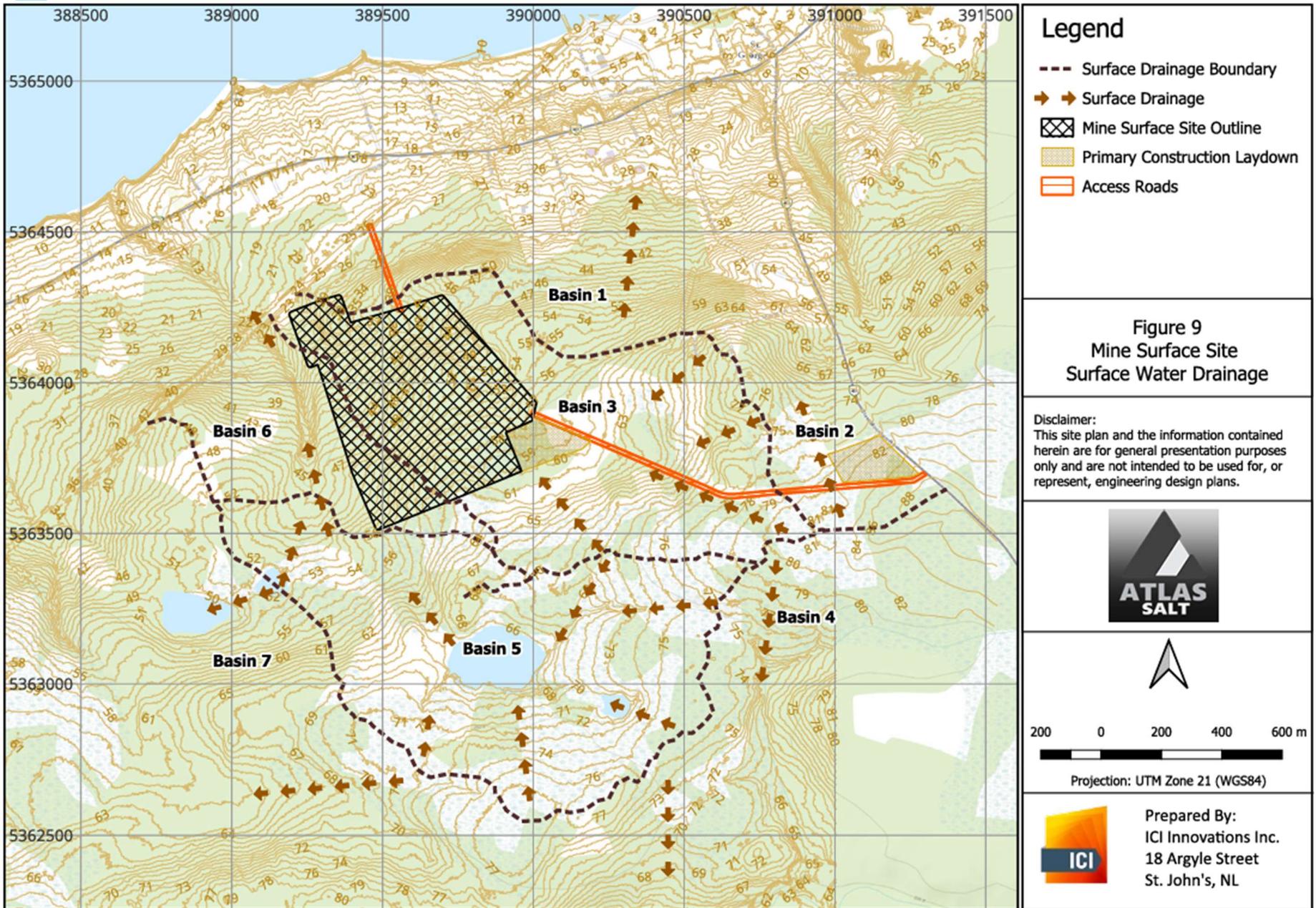


Figure 9: [Mine Surface Site Surface Water Flow](#)



2.5 Wetlands in the Project Region

Using a combination of aerial imagery from June 2023, LiDAR from June 2022 (Pioneer Elevations, 2022), a Digital Elevation Model created using the LiDAR data, previous work completed in the area, and field visits in August 2024; Atlas has delineated the wetlands in the area that may potentially be affected by the early work construction outline in this document. Figure 10 provides the extent of wetlands in the area.

Atlas has completed an analysis within the region of the Project to identify wetlands in the area that may be affected by project activities. Figure 11 provides the extents of the wetlands identified in relation to the defined drainage basins from Section 2.4.

As defined above, the wetland complex partially overlaps the early works mine site activities and extends to the southeast, south and southwest of the mine surface site. Wetland extents that are within the drainage basins that are affected by the early works activities are within Basin 2, Basin 3, and Basin 6. The secondary access road does not overlap any wetlands and is not given further consideration in this document.

An examination of the wetlands within Basins 2, 3, and 6 allows for the wetlands to be broken into 5 sections as defined and described in *Table 6* and Figure 11.

Table 6: Wetlands in the vicinity of Early Works Activities

ID	Title	Area	Description
1	Wetland within the surface mine site	104,658 m ²	All wetlands within the boundaries of the surface mine site.
2	Adjacent wetland to northeast	34,761 m ²	Wetland area that is adjacent and abuts 57 meters along the northeast corner of mine surface site boundary
3	Adjacent wetland to east	13,430 m ²	Wetland area that is adjacent and abuts 67 meters along the eastern edge of the surface mine site
4	Adjacent Wetland to south	445,419 m ²	Wetland that is adjacent and abuts 487 meters along the southern edge of the surface mine site (357 + 67 +63 meters) and through which the primary access roads traverses.
5	Large topographically isolated wetland complex to the south	1,487,638 m ²	Large wetland complex that is topologically isolated from all planned mine activities by a ridge line. This includes the wetland complex with tributaries that flow into Dribble Brook.



Most of the identified wetlands are spread out to the south of the project activities. The topography of this wetland creates a natural topographic break along a ridge line defined previously in Figure 8. North of this ridge line, surface water will drain to the north and generally towards the surface mine site. South of this ridge line surface water will drain to the south and generally towards the intermittent streams previously identified in Section 2.4 above. This ridge line results in the delineation of the wetlands to the south of the project with which the project will have no interaction and is the focus for encroachment prevention to prevent indirect effects.



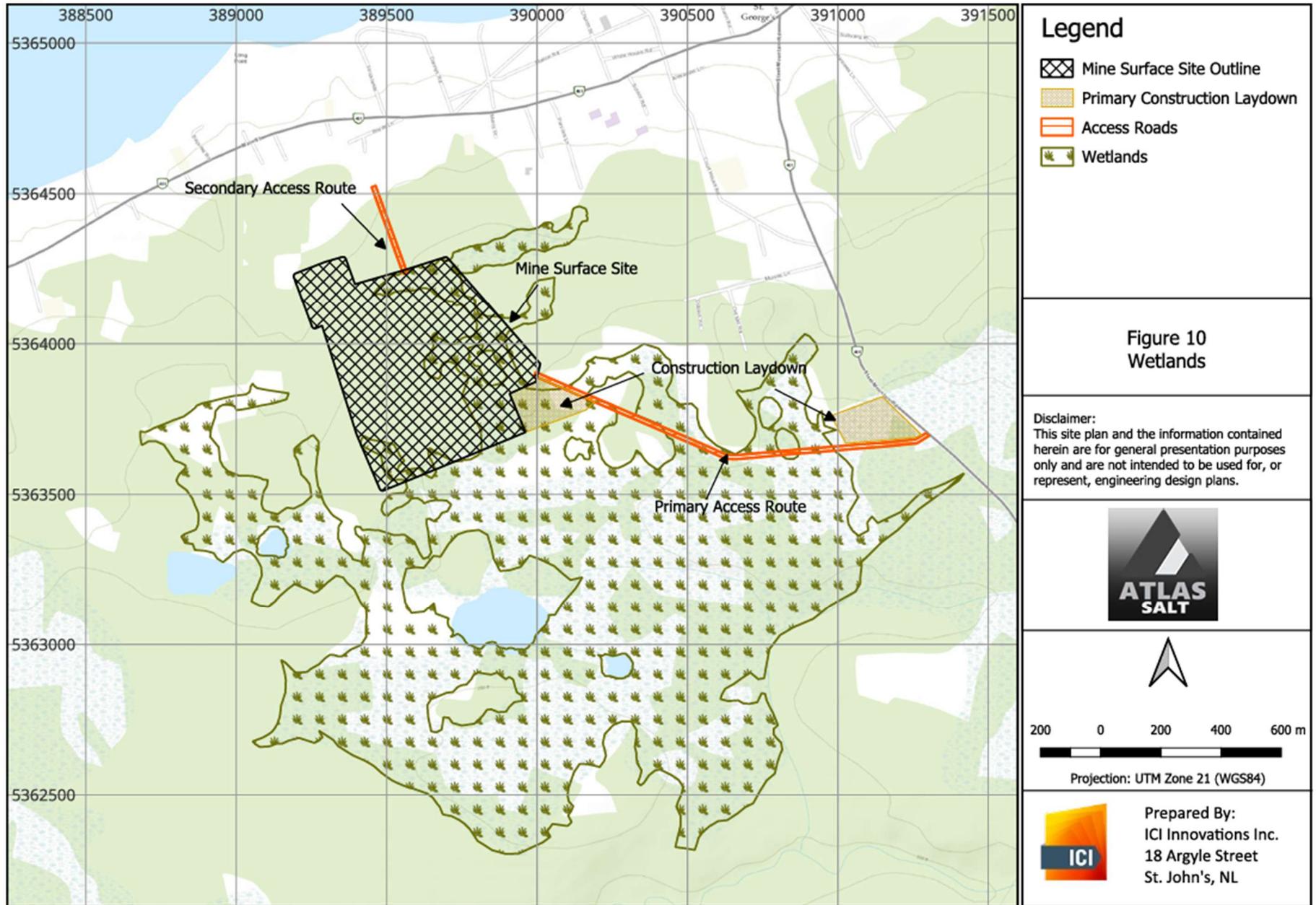


Figure 10: [Wetlands identified in the project area](#)



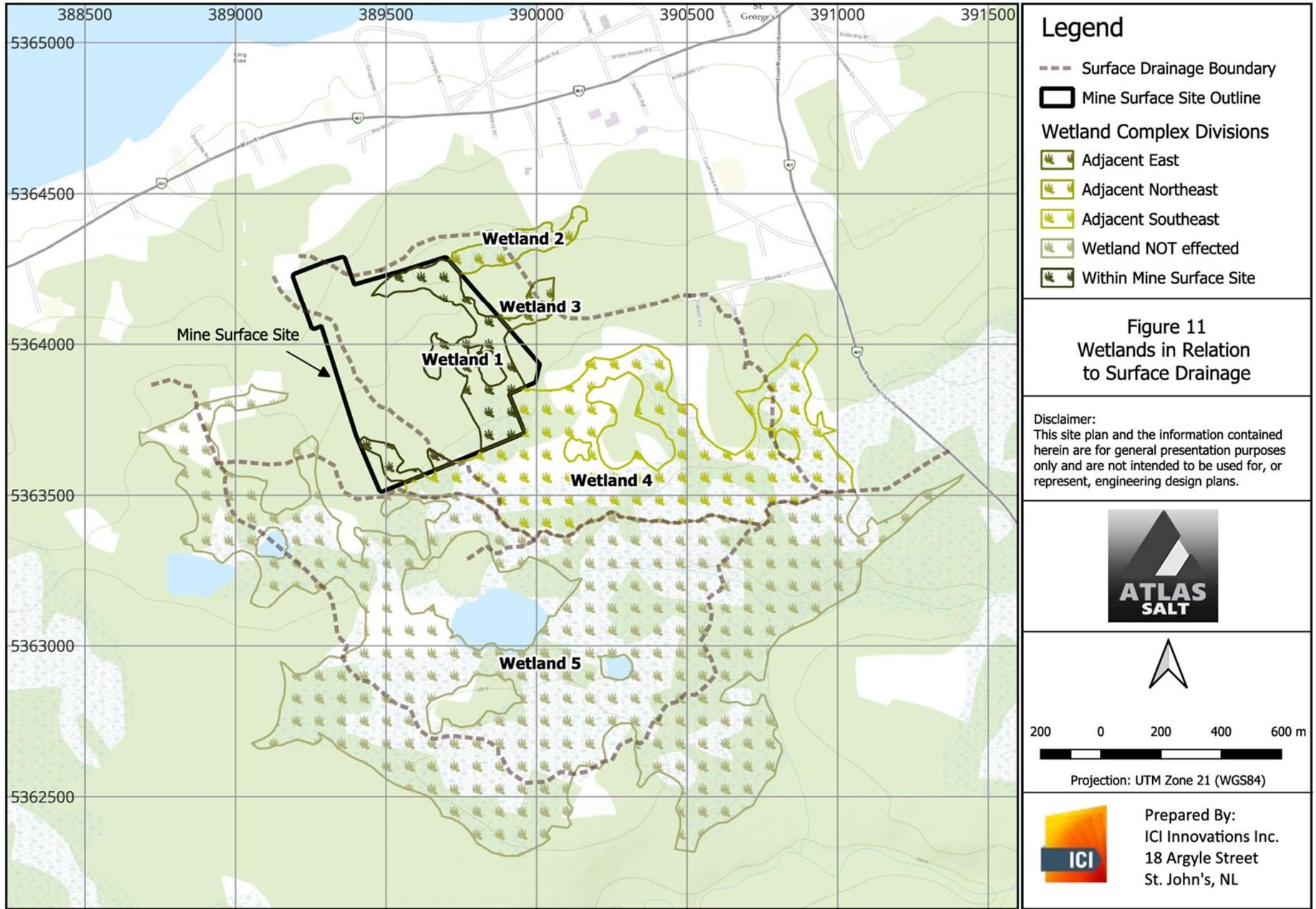


Figure 11: Wetlands in relation to surface drainage



3 Wetland Conservation and Protection

The following section describes the policies and procedures, and specific plans to be in place to minimize wetland development within the mine site area, maintain hydraulic connectivity between wetlands along the road access, and encroachment prevention for wetlands adjacent and outside the Project area.

3.1 General Concepts and Policies

Atlas has defined the following general policies/concepts for wetland conservation within the early works project activity area:

- Follow the Water Resources Management Division's, *Policy for Development in Wetlands* (NLDECC 2001)
- Ensure adherence to permitting requirements as defined and outlined in the *Policy for Development in Wetlands* (NLDECC 2001)
- The mine plan provides for management of water such that any offsite water remains offsite, and any water that is collected onsite, is settled in a settling basin to remove any sedimentation before release into the environment outside of the surface mine site
- Where feasible, avoid activity with an area or areas where there is a potential effect to a wetland, or where the adjacent topography and surface water flows may result in a potential effect to a wetland area
- Where avoidance is not feasible and it is feasible to maintain the wetland area, mitigate or protect potentially affected wetlands
- Where removal of wetland is necessary, isolate removed area from adjacent wetlands to mitigate any potential effects
- Where wetlands have been removed, and where feasible, maintain water flows and drainage to/from adjacent wetlands
- Define temporary measures for construction and operation for the protection and conservation of wetlands
- Define policies and procedures for wetland protection and conservation, and document these within the Environmental Protection Plan (EPP)

3.2 Policies and Procedures

The *Atlas GAS Early Works Environmental Protection and Mitigations Plan* (EPP) submitted in January 2025 details the environmental concerns, and the related protection procedures for the Project (Atlas, 2025a). The following (taken from the EPP) outlines some specific relevant procedures/practices as it may relate to the conservation and protection of wetlands.



3.2.1 General

- Avoid effects during sensitive time periods when achievable, and mitigate effects when activities must occur during sensitive time periods
- Ensure all required permits and approvals are in place prior to commencement of activities, and ensure all permits are available and reviewed by activity participants

3.2.2 Temporary Ditching During Construction

It is anticipated that during construction temporary ditching will be required to control and direct water within the early works activity areas. The EPP provides general operating procedures for water and sediment control. Early in the construction process, a temporary settling basin will be created in the area that will be used at a future phase as the long-term settling pond. Subsequent to the construction of this feature, ditching will be utilized within the surface mine site that will direct water towards the temporary settling basin. It is anticipated that the temporary settling pond will allow water to settle and/or filter through the natural environment and flow back into the environment.

3.2.3 Sensitive Time Periods

The following environmental protection procedures are defined for the early works phase:

- A complete schedule of activities, provided by the Contractor and accepted by Atlas, will be completed prior to commencement of any construction task and restrictions on timing will be noted on the schedule.
- While the ideal time of year for construction located near a waterbody is typically in early June through to late October (lower precipitation and surface water (GemTec, 2023)), construction may be occurring at other times where surface water levels may be higher. Mitigations will be implemented, where feasible, to reduce potential for interaction during those times.
- Where feasible, construction activities in or around waterbodies will be reduced or avoided between May 1 and September 30 to accommodate the Department of Fisheries and Ocean's (DFO's) timing windows to avoid potential impacts to fish habitat (including



Atlantic Salmon). If work is to be performed within this timeframe, it will be done so in accordance with DFO's Best Management Practices for the Protection of Freshwater Fish Habitat in Newfoundland and Labrador (DFO, 2022).

- Stripping, grading, excavating and/or rehabilitation activities will be scheduled to reduce the amount of time the soil is exposed to elements.
- Activities will be conducted in such a way as to reduce the amount of time spent in or around a stream or waterbody.
- Clearing of vegetation will be conducted whenever possible outside of the breeding season for birds, March 15 to August 15 (ECCC). If it is not possible, clearing activities that will need to take place will be targeted, and completed in accordance with relevant federal and provincial regulations.

3.2.4 Work within 15 Metres of a Waterbody

The following measures will be taken to minimize any potential harm that works could have on a waterbody:

- Where possible, the majority of the field activities will take place during low flow and the low rainfall period (i.e. summer months).
- Clear instructions regarding regulatory requirements and the operation of heavy equipment will be expressed to contractors and site personnel. All conditions of permits and approvals for working within 15 meters of a waterbody require strict compliance.
- Heavy equipment will be kept outside the high water mark of all waterbody.
- Where an acceptable biodegradable lubricant is available for a piece of equipment working within 15 m of a waterbody, the biodegradable lubricant will be used.
- Fuels, chemicals or deleterious materials will not be stored near a waterbody.

3.2.5 Alterations to a Waterbody / Instream Works

- Works within 15 m of a waterbody visible on a 1:50,000 scale map shall require a Certificate of Approval from WRMD. A request for project review shall be submitted to DFO. Work shall adhere to



conditions of the Certificate of Approval from WRMD and the Letter of Advice from DFO, if issued.

- Works conducted within or near a waterbody will follow the best practices laid out for activities within DFO-NL's Best Management Practices for the Protection of Freshwater Fish Habitat in Newfoundland and Labrador (DFO, 2022).
- Erosion stabilization methods and effective sedimentation control practices shall be implemented when required, and these shall conform to requirements, WRMD Environmental Guidelines and specific requirements of regulatory permits and approvals.
- Floating silt curtains or suitable alternative may be used to contain and control the dispersion of turbidity and sediment when working in or near a waterbody.
 - The curtain will be located beyond the lateral limits of the construction site; the alignment will be as close as possible to the activities but not so close as to be disturbed by the construction equipment.
 - The curtain will be firmly anchored in place by posts.
 - The contractor will remove built up sediment and debris as required; if the fabric becomes clogged, it will be replaced.
- During construction of concrete components, formwork shall be constructed to prevent any fresh concrete from entering waterbodies. Dumping of concrete or washing of tools and equipment in any waterbody is prohibited.
- Attention will be given to scheduling. The longer a stream is disturbed; more sediment will enter the watercourse. The ideal time for construction is during low flow, and the low rainfall period.
- Unless otherwise indicated, all work will take place in dry conditions, either by the use of a rock plug or by diverting the stream with pumps and hoses. All work involving major alterations to stream channels will be carried out at a time of low flow, in a manner that prevents downstream sedimentation.
- Inlet and outlet areas shall be adequately protected from erosion by installing erosion prevention structures such as rip rap.



3.2.6 Erosion Prevention and Sediment Control

The following is taken from Section 4.12 of the Atlas GAS Early Works Environmental Protection and Mitigations Plan (Atlas, 2025a).

Erosion and sedimentation control is an important aspect of the project where there are local wetlands and watercourses outside of the mine footprint. The application of erosion control measures is found throughout the activities listed throughout section 4 (of the EPP) but reiterated here to provide a more thorough evaluation of site-specific activities required by Project.

3.2.6.1 *General*

The most effective way to control erosion and sedimentation is to avoid activities that lead to it. All areas of exposed soil are to be stabilized by grading to meet slope requirements. Where erosion along an exposed slope is a concern, and sufficient vegetation does not exist to act as a buffer between the high water mark of the waterbody and the exposed soil, a silt fence will be constructed to control sediment runoff. Engineering requirements will vary depending on the locations of the silt fence and will take factors such as drainage/surface area of exposed soils into consideration.

Contractors will use erosion and sedimentation control measures to ensure water control on site. Any water discharge into a waterbody, watercourse, or ecologically sensitive area, due to construction activities will comply with applicable discharge guidelines as presented in the Newfoundland and Labrador Environmental Control Water and Sewer Regulations under the *Environmental Protection Act* (GNL, 2002)

3.2.6.2 *Watercourses*

There is no in-water/near-water work proposed for the project. There will be work in wetlands within areas of the site.

3.2.6.3 *Exposure of Erodible Soils*

Areas with existing vegetative cover will be developed as part of the work program. These areas include the surface mine site. The following actions will be taken to minimize the erosion of exposed soils and the discharge of suspended sediment in runoff waters leaving these sites:



- preliminary site reconnaissance indicates that no natural streams flow through the areas to be developed, however, if a natural water course is found in any area, a minimum 30 metre buffer will be left adjacent to the stream bank in which no overburden will be removed;
- overburden from the cleared areas will be stockpiled in windrows on the upslope sides to divert rainwater flows from non-cleared areas away from areas of exposed soils;
- the downslope side of each area will be ditched suitably to allow for the capture of surface drainage water flowing over the exposed soils;
- sediment control basins/traps will be established within the downslope ditches, accumulated sediment will be removed as required to maintain retention capacity, and the structures stability will be checked regularly and repaired as required to maintain effectiveness;
- the Total Suspended Solid (TSS) content of construction-altered water that is released into a natural waterbody will not exceed 30 milligrams per litre² and be in compliance with *Environmental Control Water and Sewage Regulations, 2003* (GNL, 2003).

3.3 Water Management Infrastructure

As part of the early works activities there are specific planned activities and infrastructure to be built for the management of onsite and offsite water. This includes the use of ditching and culverts along the primary access road, diversion ditching surrounding the mine surface site, and infrastructure within the mine surface site, including catchment ditching to divert water to an onsite settling basin where water can settle and be released into the natural environment in a controlled fashion.

The planned diversion ditch will surround the entire mine surface site. It will be comprised of an approximately 1m deep ditch that will direct offsite water around the mine surface site, and a 1m berm to keep onsite surface water from interacting with the offsite water.

The onsite water will be directed by catchment ditches that surround the terrace and stockpiles into a settling basin. The settling basin is planned as a dug basin



with a 0.75m berm. The settling basin will allow water to settle then release water into the natural environment west and south of the mine surface site.

The *Atlas GAS Early Works Water Resources Management Plan* (Atlas, 2025b) outlines the details of the proposed water management infrastructure.

3.4 Wetland Conservation Details

The following outlines specific practices and policies associated with wetland areas that are potentially affected by the early works activities (defined in Section 0).

3.4.1 Wetlands within the Mine Surface Site

The disturbed surface area of the mine surface site is 389,000 m². This entire area will be grubbed and 50cm of organic soils removed and stored on the organic stockpile. This includes all wetland areas within the site (identified as wetland 1 in *Table 6*). Approximately 104,658 m² of the mine surface site is wetland that will be removed (*Figure 12*). The area within the surface mine site will be isolated from the surrounding lands including the adjacent wetlands. This is accomplished via the diversion ditches and peripheral berm that is constructed around the surface mine site (See Section 3.3).

3.4.2 Isolated and Protected Adjacent Wetlands

As defined in Section 2.5 above, there are two wetland areas that are adjacent to the surface mine site that are to be isolated and protected from project activities to mitigate potential for effects. Wetlands identified as 2 and 3, adjacent to the northeast and east respectively (*Figure 13*).

The portion of these wetlands that are within the surface mine site are to be removed and the remaining wetland, totalling 48,191 square meters will be protected from effects related to the surface mine site via the peripheral berm and ditching (Section 3.3) and the natural topography of the surface.

The balance of wetland that remains is topographically up slope from the mine site which will naturally inhibit any water flow from the surface mine site. Additionally, with the berm in place that surrounds the surface mine site, there will not be any water flow from the site. Water movement from the wetland will flow into the diversion ditch that surrounds the site and be directed around the site to naturally drain into the vegetated areas topographically below the surface mine site.



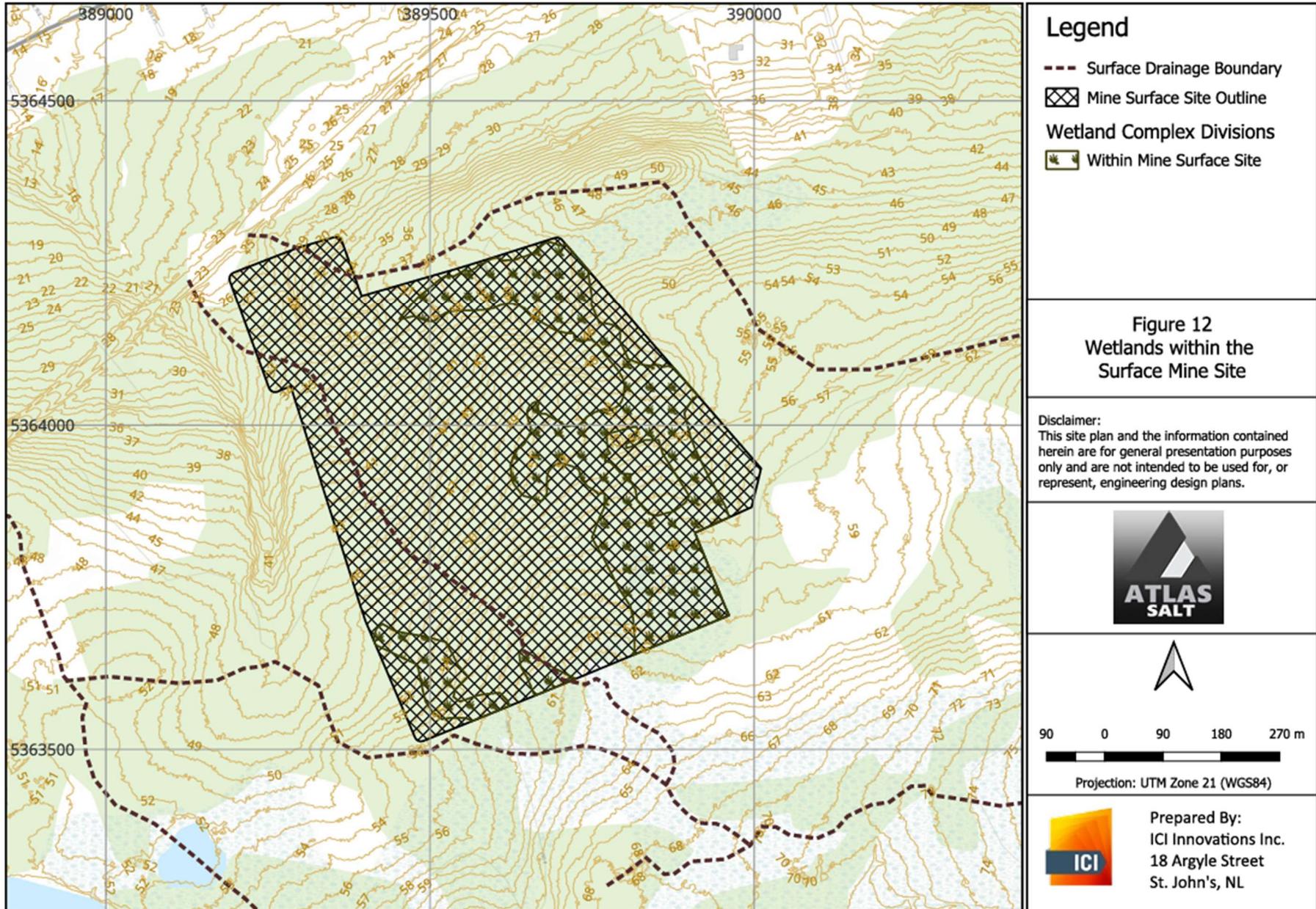


Figure 12: Wetlands within the Surface Mine Site



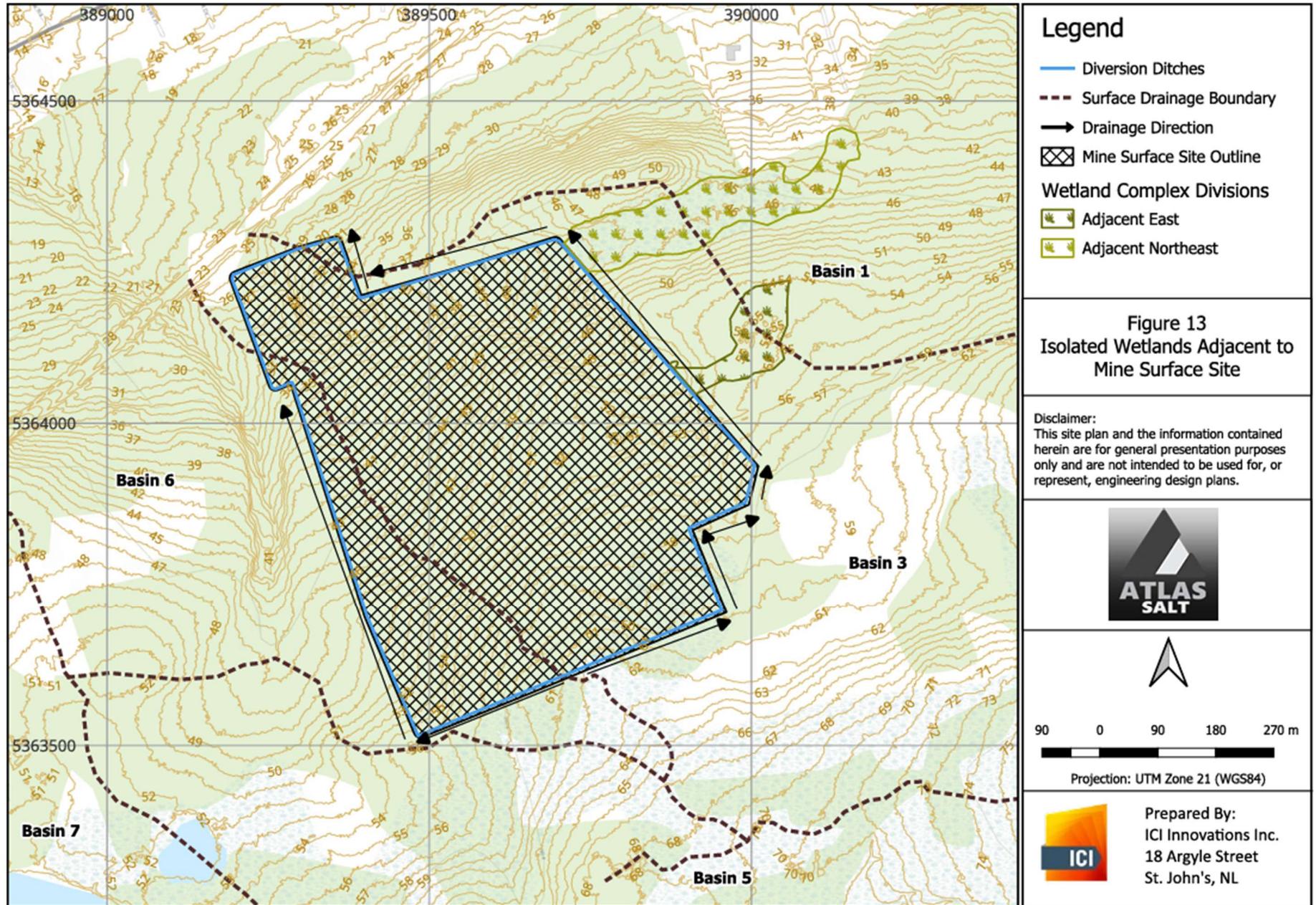


Figure 13: Isolated Wetlands Adjacent to Mine Surface Site.



3.4.3 Wetlands that Overlap Ancillary Project Activities

Several supporting components of the Great Atlantic Salt (GAS) Project, such as access roads, laydown areas, and other auxiliary construction sites, partially extend into wetland areas adjacent to the main mine surface site (wetland 4 in Table 6). This section describes the location and extent of these overlapping wetlands, outlines how construction activities may affect them, and specifies the mitigation measures to minimize habitat disturbance and protect local hydrology. Emphasis is placed on maintaining natural water flows, preventing inadvertent damage through proper siting and design of project facilities, and ensuring compliance with the broader objectives of the Wetland Conservation Plan and regulatory requirements.

3.4.3.1 *Wetlands affected by the Primary Access Road*

The primary access road exits off Steel Mountain Road and is sloped down at relatively consistent slope of 2% to the surface mine site entrance. The road is 1360 meters long going from 88 meters elevation as it exits Steel Mountain Road to 58 meters as it enters the surface mine site. The planned road is a two-lane compacted gravel road that is a total of 15.7 meters wide. This is made up of 13.3 meters of road, and 1.2 meters of ditch on each side of the road. The total disturbed area associated with the access road is 21,352 m².

Those areas along the disturbed area of the road that intersect the wetlands will be removed and filled with suitable material for road construction. Approximately 13,264 m² of wetland will be removed as a result of the primary access road. As indicated in Figure 14, the access road bisects the affected wetland into two sections. The section to the south of the access road is 300,737 m² and the section to the north being 105,877 m².

To minimize any potential hydrologic and environmental effects, the following are to be in place as it relates to the primary access road:

- Install culverts along the path of the road to allow water flow between the wetlands on either side of the road. There are 4 culverts planned as indicated in Figure 14. These culverts are 15m long and 0.5 meters in diameter. These culverts allow



water to cross the roadway, thus allowing free flow of water to the wetland that is bisected by the roadway.

- Ditches on either side of the primary access road will route water from the road, allowing clean water to flow along the sides of the road and be diverted at intervals into the adjacent natural vegetation, or flow to the diversion ditches that surround the surface mines site.



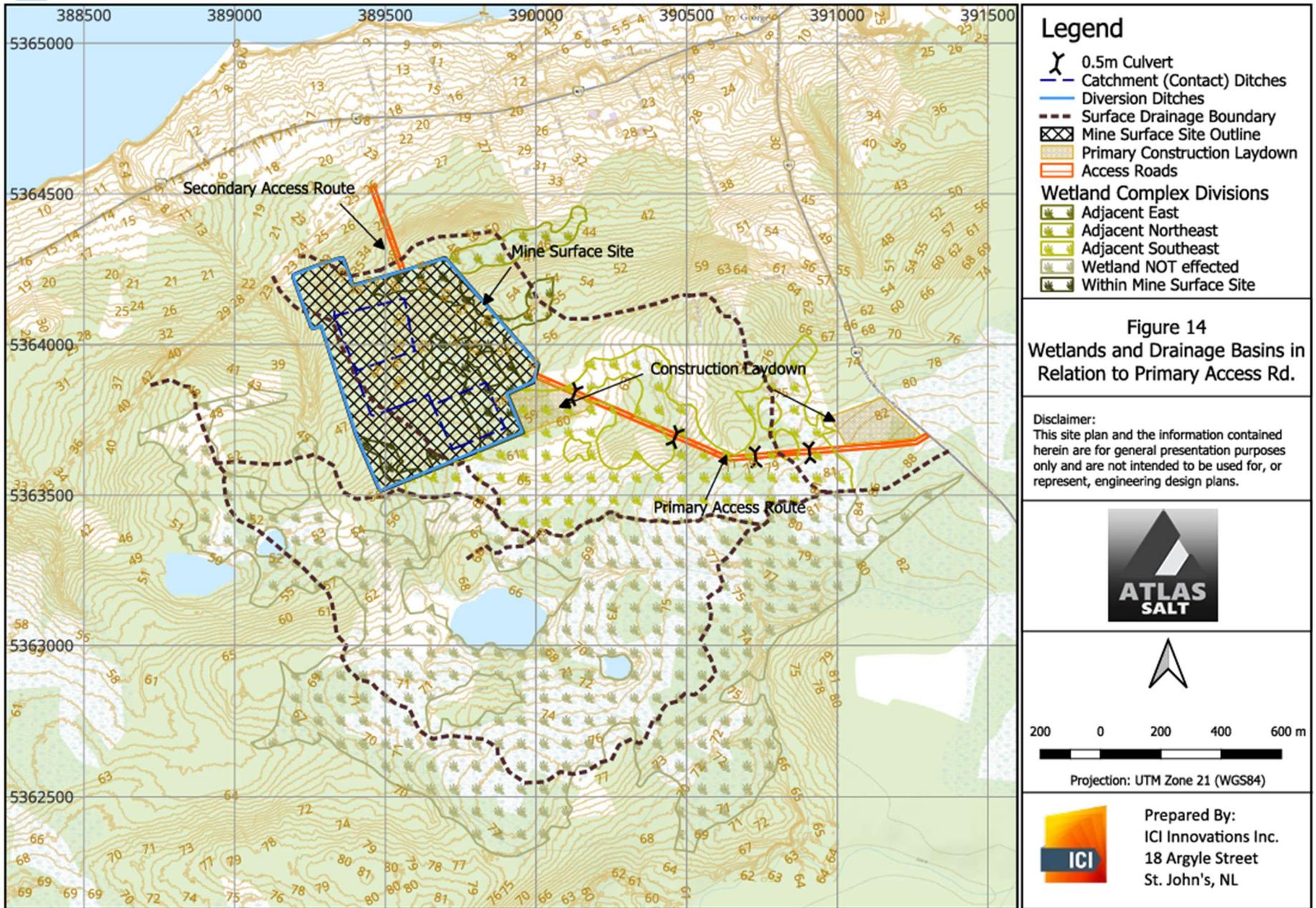


Figure 14: Wetlands and Drainage Basins in Relation to Primary Access Road



3.4.3.2 *Wetlands affected by the Construction Laydowns*

There are two construction laydown areas planned for early works: the first construction laydown area is to be constructed adjacent to the primary access road where it enters off Steel Mountain Road, and the second adjacent to the primary access road where it enters the surface mine site.

The first construction laydown adjacent to Steel Mountain Road does not intersect any wetland area identified (*Figure 15*). Note that the laydown area will be sloped 2% toward the natural vegetation on the north edge of the laydown. This will facilitate surface water flow being reintroduced into the adjacent natural environment.

The construction laydown adjacent to the mine site (*Figure 16*) is 28,000 m² and is largely wetland. 27,500 m² of wetland area will be removed as part of construction. To minimize effects associated with this area, the laydown area will be sloped at approximately 2% to direct surface water from the southern west corner towards the primary access road and the diversion ditching that will surround the surface mine site. Water flowing into the road and diversion ditching will be reintroduced to the natural environment along the path of the diversion ditches.



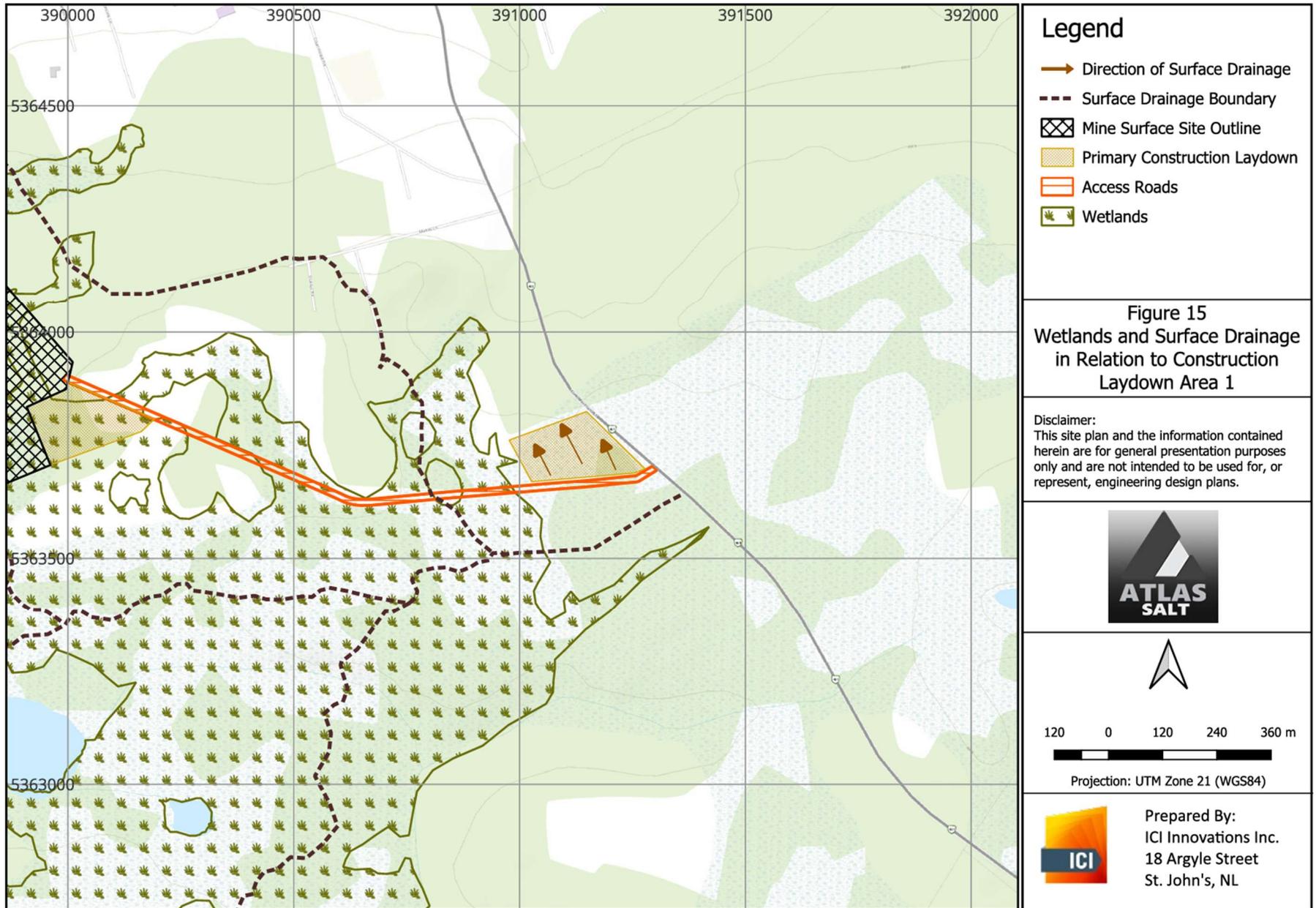


Figure 15: [Wetlands and Surface Drainage in Relation to Construction Laydown Area 1](#)



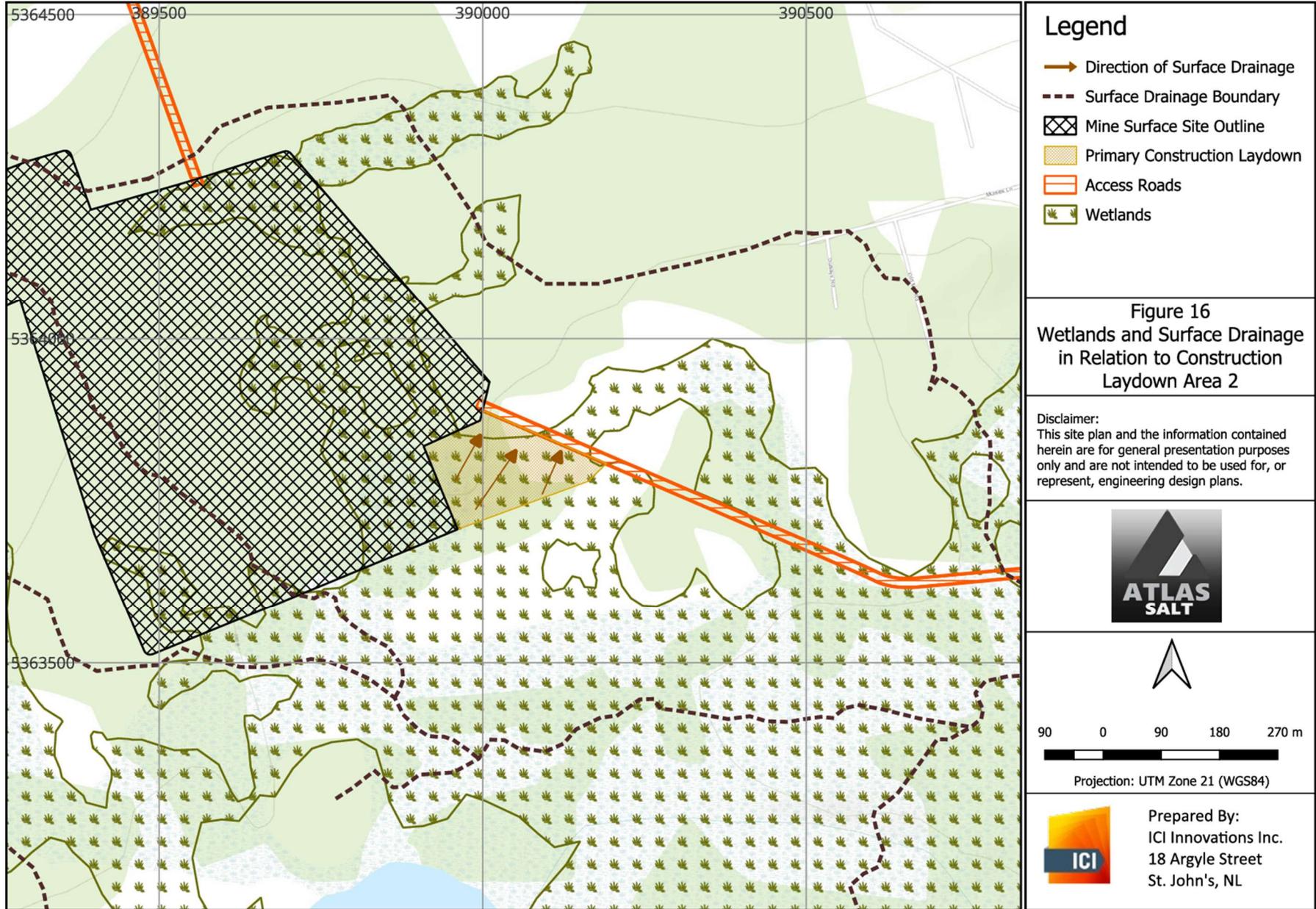


Figure 16: [Wetlands and Surface Drainage in Relation to Construction Laydown Area 2](#)



3.4.4 Wetlands with Tributaries that Flow into Dribble Brook

As indicated in Section 2.4 and Figure 11 above, the majority of the wetland complex to the south of the surface mine site (wetland 5 in Table 6) is topographically separated (isolated) from the early works activities (Figure 17). The construction plans for the Project, including the activities defined in this plan, do not interact with the wetlands that exist to the south of the ridge line defined by the topography in the area.

The importance of this wetland complex has been recognized. As such, Atlas has planned the activities to ensure that no surface water flow from the activity areas (including surface mine site, the primary access road, and the secondary access road) will interact with this wetland complex.

As indicated in *Figure 9*, the boundary of the drainage basins separate the southern wetland complex into the area that slopes towards the mine site and that which slopes away. The examination of the contours and surface drainage channels demonstrates the surface water flows. This clearly demonstrates that this wetland is isolated from any effects from the early works activities. The drainage channels within this wetland can be further broken into a drainage area with channels that flow around the southwest end of the mine site, and ultimately into the Man O'War Brook. The drainage area south of this contains the tributaries that drain into Dribble Brook. These areas are both isolated from the mine activities.



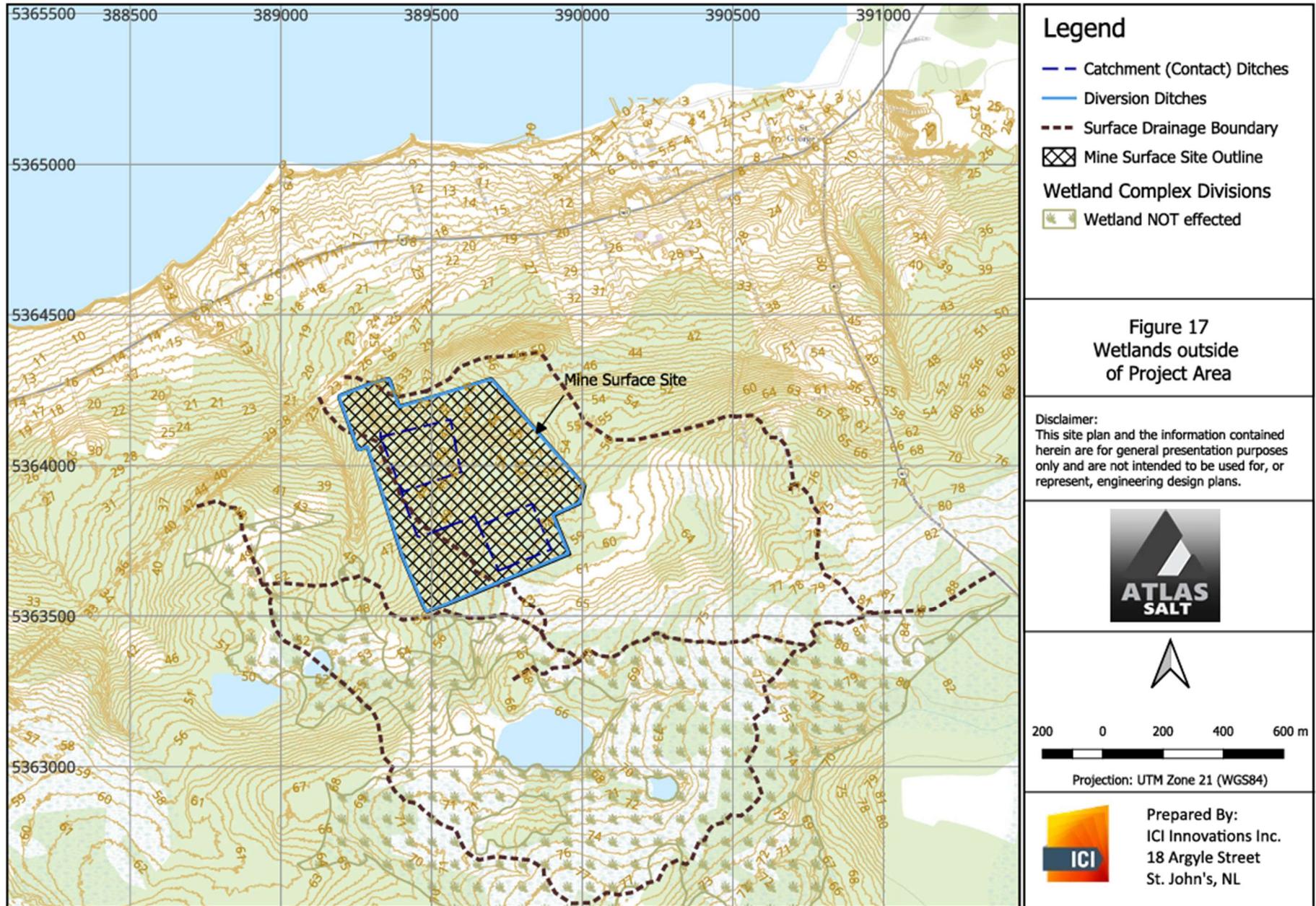


Figure 17: Wetlands outside of Project Area



3.5 Roles and Responsibilities

The following subsections clarify the roles and responsibilities of all parties involved in implementing this Wetland Conservation Plan (WCP) during the Early Works activities. These responsibilities supplement those outlined in the Atlas GAS Early Works Environmental Protection and Mitigations Plan (EPP), the Atlas GAS Early Works Water Resources Management Plan (WRMP), and any other associated documents.

3.5.1 Project Owner (Atlas Salt Inc.)

- Overall Accountability: Atlas Salt Inc. (Atlas) holds ultimate accountability for ensuring that all Wetland Conservation Plan commitments are met and that project activities comply with regulatory requirements.
- Permit & Regulatory Compliance: Responsible for obtaining, reviewing, and maintaining all necessary permits, approvals, and licenses specific to wetland conservation and protection.
 - Ensures that relevant regulatory agencies and stakeholders (e.g., Water Resources Management Division, Department of Fisheries and Oceans) are consulted and updated as required.
- Resource Allocation: Provides the financial, human, and technical resources necessary to implement all wetland mitigation and monitoring measures effectively.

3.5.2 Project Manager

- Implementation Oversight: Oversees the day-to-day coordination of construction and environmental teams to ensure all activities align with the WCP's mitigation measures and schedules.
- Contractor Coordination: Communicates wetland-related requirements to all contractors and subcontractors, ensuring they are aware of site-specific procedures (e.g., buffer zones, erosion controls, work stoppage protocols).
- Decision Authority: Has the authority to stop work if a wetland area is at risk of harm beyond what is permitted, or if required mitigation measures are not being followed.



3.5.3 Environmental Manager

- **Compliance Monitoring:** Conducts regular inspections and monitoring of wetlands adjacent to work areas, ensuring that sediment and erosion control measures, buffer zones, and runoff diversions are functioning properly.
- **Reporting & Documentation:** Maintains all wetland-related records, including inspection logs, incident reports, and monitoring data. Prepares and submits compliance reports to regulatory authorities as needed.
- **Training & Awareness:** Develops or coordinates training sessions for site personnel on wetland protection practices (e.g., best management practices for working near wetlands, correct use of silt fences).
- **Incident Response:** Leads the response to any environmental incidents (e.g., unplanned wetland disturbance, significant erosion events) and ensures corrective measures are taken promptly.

3.5.4 Construction Manager

- **On-Site Execution:** Implements site activities (e.g., clearing, grading, ditching, road construction) in full accordance with the specifications in this WCP, the EPP, and relevant permits.
- **Resource and Equipment Management:** Ensures that the correct materials (e.g., silt fences, culverts) and equipment are available at the right time to maintain compliance with wetland protection requirements.
- **Coordination With Environmental Staff:** Works closely with the Environmental Manager to schedule tasks around environmentally sensitive periods (e.g., breeding bird windows, fish-spawning seasons) and ensure that the proper mitigation measures are in place before work commences.

3.5.5 Contractors and Subcontractors

- **Plan Adherence:** Comply with all relevant sections of the WCP, EPP, and site-specific instructions regarding wetland protection, erosion control, and waste management.



- Incident Reporting: Immediately report any spills, unexpected wetland interactions, or potential permit non-compliance to the Construction Manager and/or Environmental Manager.
- Equipment Maintenance: Keep all vehicles and machinery in good working order, particularly when working in or near wetland buffer zones, to reduce the risk of leaks and discharges.



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