



Project Tuckamore Environmental Assessment Registration

September 2026



Executive Summary

Corner Brook Pulp and Paper Limited (CBPPL), a subsidiary of Kruger Inc., is proposing Project Tuckamore, a long-term investment project in western Newfoundland and Labrador. The Project is intended to support the future of the Corner Brook Mill, strengthen the forestry sector, and increase the use of renewable energy in Mill operations. Project Tuckamore includes four interconnected components: forestry modernization, upgrades at the Corner Brook Mill, improvements to Deer Lake Power facilities, and the development of a new wind farm. These components are being planned as part of a broader effort to support the long-term sustainability of forestry and manufacturing in the region.



Forestry



Mill Site



Wind Farm



Hydro Generation

The development of a wind farm and associated infrastructure requires an Environmental Registration under the *Environmental Assessment Regulations* of the NL *Environmental Protection Act*. This summary provides an overview of the Environmental Registration, including the Project components, potential effects, proposed mitigation measures, engagement activities, and regulatory review process. Environmental studies, community engagement, Indigenous engagement, and regulatory review are ongoing to help inform Project planning and decision-making.

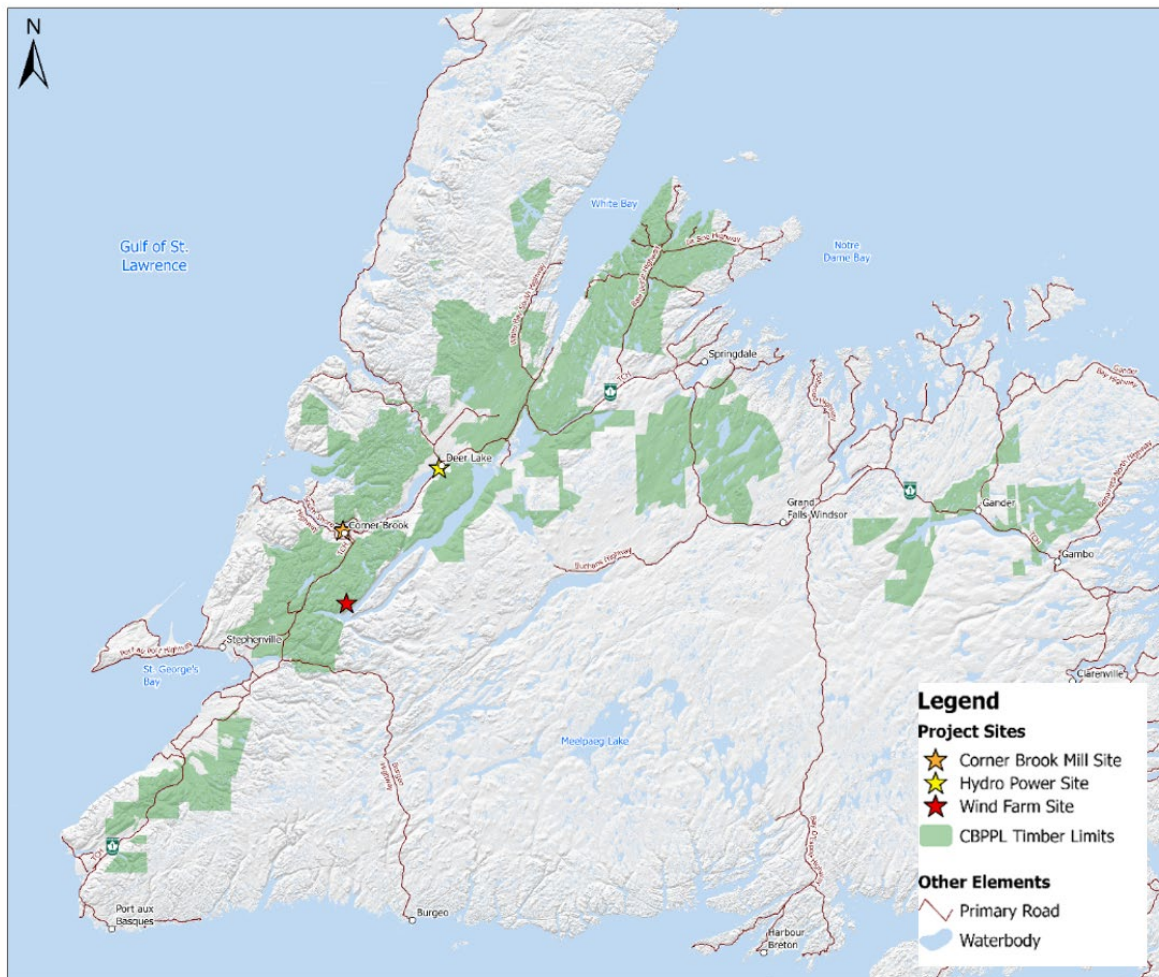
At A Glance

Snapshot Item	Summary
Why?	Support the long-term future of the Corner Brook Mill and provincial forestry sector while increasing the generation and use of renewable energy
What's Included?	Forestry modernization, Mill upgrades, Deer Lake Power improvements, and a proposed wind farm
Wind Farm	Up to 22 wind turbines generating up to 155 megawatts of renewable electricity
Construction	Approximately three years
Wind Farm Site Setting	Within an actively managed industrial forest landscape and would use existing roads and previously disturbed areas where practical
Benefits	Retain jobs, local business opportunities, and reduced reliance on fossil fuels
Current Status	Environmental studies, engagement, and regulatory review are underway

Project Tuckamore Overview

Project Tuckamore brings together several initiatives which will extend the life of the Mill and transform CBPPL into a modern, competitive, and sustainable fibre-based producer. The integration of renewable energy infrastructure to support Mill operations will improve sustainability and reduce reliance on fossil fuels. Changes to existing forestry practices will improve how trees are harvested, re-planted, processed, transported, and eventually used by provincial sawmills and the Mill. Upgrades at the Corner Brook Mill will maintain the existing Mill workforce, reduce the emission of green house gases, and make greater use of renewable electricity. Improvements to Deer Lake Power will also increase the contribution of firm, renewable power to the Provincial power grid.

The solution will protect approximately 1,000 forestry jobs across Newfoundland and Labrador, including 377 at CBPPL, while generating economic benefits through \$700 million in Project spending, over 713 full-time equivalent jobs associated with Project Tuckamore, and an estimated \$57.5 million contribution to the local economy.



The proposed wind farm will provide a new source of renewable electricity to help power Mill operations. The wind farm, hydroelectric improvements, Mill upgrades, and forestry modernization activities have been designed to work together as part of a single long-term strategy to revitalize Corner Brook Pulp and Paper's operations.

Benefits to the Province, Communities and the Economy

Project Tuckamore represents a major investment in western Newfoundland and Labrador. The Project is intended to maintain employment at the Mill, across forestry operations, transportation, trades, construction, and related service industries. The Project will allow Deer Lake Power to integrate predictable, reliable and constant renewable power to the NL electricity grid. During construction of the wind farm, employment opportunities will be created for workers in a variety of occupations. Local businesses will also benefit through contracts for supplies, accommodations, transportation, equipment, and professional services.

The Project will also contribute to broader efforts to reduce greenhouse gas emissions associated with industrial operations by reducing the current storage and use of oil.

Key Benefits for Newfoundland and Labrador

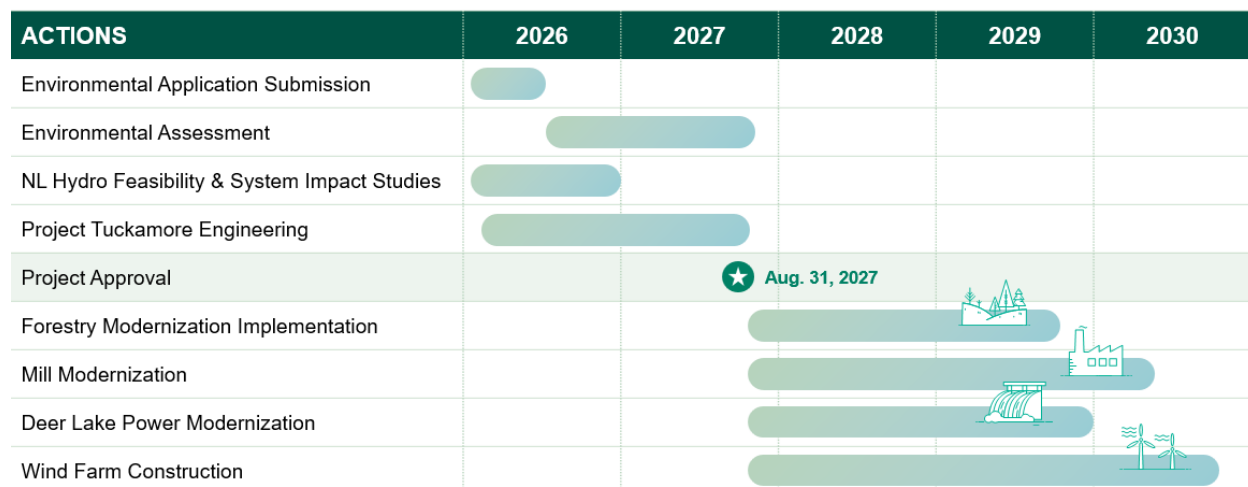


Regulatory Process

Each component of Project Tuckamore is subject to government review and oversight. Forestry modernization, Mill upgrades, and Deer Lake Power improvements will continue to follow established planning, permitting, licensing, and operational approval processes under applicable provincial and federal requirements. The wind farm requires review and approval under the provincial environmental assessment process. Once released from the environmental assessment process additional permits and approvals may be required from provincial and federal regulators for things such as access roads, highway and road upgrades, oversize and overweight vehicle movements, water use, watercourse crossings, aviation marking and lighting, and navigable waters. As the access to the wind farm is partially within the City of Corner Brook's planning area, municipal permitting will also be required.



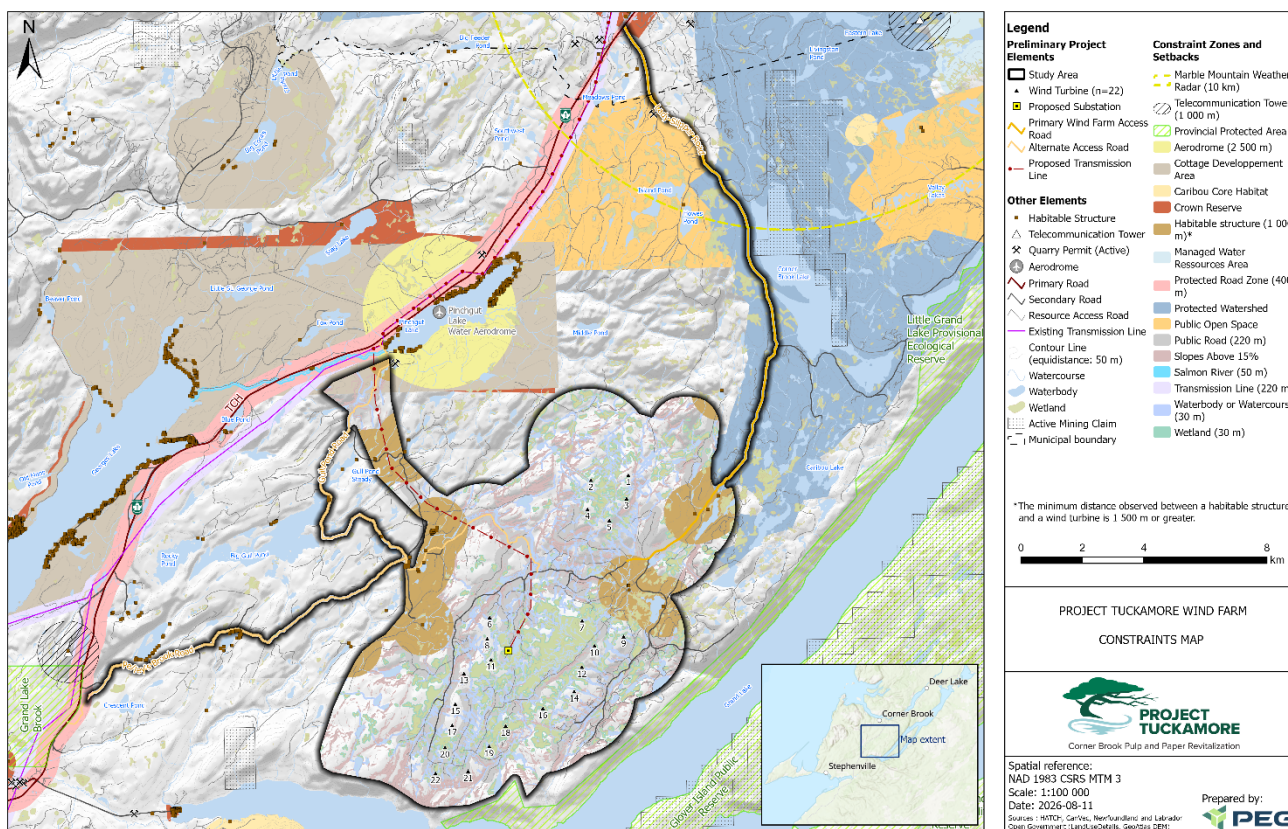
Revitalization Project – Overall Timeline



The Proposed Wind Farm

The wind farm is located within CBPPL forest lease area just outside of Corner Brook at the end of Lady Slipper Road. This area has been used for industrial wood harvesting since the early days of the Mill. The wind farm includes up to 22 wind turbines and associated infrastructure, including access roads, electrical collector lines, a substation, temporary work areas, and operation and maintenance facilities. It will have a maximum generating capacity of approximately 155 megawatts. A priority in wind farm design has been making use of existing roads and previously disturbed areas where practical, which helps to limit the extent of new disturbance required. As an example, the existing transmission line from Pinchgut Lake to Massey Drive would be widened to allow for a new line to carry power to the existing substation in Massey Drive.

Construction of the wind farm is expected to occur over approximately three years. Activities would include road improvements, site preparation, turbine installation, and electrical infrastructure construction. Following construction, temporary work areas will be reclaimed except where restrictions are required for operational or safety reasons. Throughout construction and operation, management plans will guide activities at the Wind Farm Site. These plans will address topics such as environmental protection, wildlife management, water protection, traffic management, waste management, emergency response, Indigenous engagement, stakeholder engagement, and site reclamation.



What We Heard During Engagement

CBPPL has spent several months talking to government agencies, Indigenous groups, interested parties, land users, and community members. These discussions have helped identify the topics of greatest interest during the assessment process. Broadly, comments have focused on jobs (new jobs and concern for changing jobs), the environment (primarily wildlife, water, climate change), on-going and planned studies (such as birds, bats, and species at risk), access to the area (including cabins and hunting), and traffic (such as routes to move the turbines from the port to the wind farm area and road safety).

This input has helped focus the assessment, inform the wind farm layout, guide the selection of study topics, and shape the management plans that will be used during Project activities. It also helped identify where additional information should be provided on topics such as sensitive human receptors (e.g., cabins), private wells, watercourse crossings, hunting and outfitter use, transportation planning, waste management, wildlife surveys, and monitoring. Engagement will continue as Project planning, regulatory review, and permitting move forward.

To support open communication and meaningful engagement, CBPPL has established a Community Engagement Office at 3 Mill Road in Corner Brook, providing direct access to Project team members and information about the Project. The office is barrier-free, child-friendly, open to the public weekdays, and includes Project materials such as maps, visual displays, GIS data, and regular Project updates.

Potential Effects of the Wind Farm and Measures to Reduce Adverse Effects

The sections below summarize the main environmental and socio-economic topics considered for the wind farm, describing what could happen, how effects will be managed, and monitoring or follow-up. The wind farm has been planned using known environmental information and setback distances. In addition, standard mitigation and environmental management measures will be developed and implemented to conduct construction and operation of the wind farm in an environmentally and socially responsible manner. These measures will be grounded by both regulatory requirements and Kruger Energy practices that are applied at other wind farms that they operate across Canada.

Air Quality, Greenhouse Gases, and Dust

What could happen: Construction activities can create dust from clearing, grading, loading and unloading materials, driving on unpaved roads, preparing turbine pads, and moving materials within the Wind Farm Site. Greenhouse gas emissions will be produced by heavy equipment, worker and material transportation, fuel use during construction, and vegetation clearing. On-road transport of construction materials from the Port of Corner Brook to the Wind Farm Site will contribute to construction emissions. During operation, emissions from the wind farm are expected to be low and mainly related to maintenance vehicles and rare use of emergency generators. The renewable electricity generated by the wind farm will be used at the Mill and will reduce reliance on fossil fuels for Mill operations.

How effects will be managed: Dust control measures will include monitoring weather conditions, using water or another approved dust suppressants during dry and windy periods, maintaining road surfaces, applying appropriate speed limits, covering or stabilizing exposed materials where needed, and re-vegetating temporary disturbance areas after construction. Equipment will be maintained in good working order, unnecessary idling will be avoided where practical, and timber will be salvaged where possible. Construction planning will also consider the number and timing of vehicle movements to help reduce avoidable emissions and nuisance dust.

Monitoring or follow-up: Dust levels will be observed during construction. CBPPL will implement a complaint resolution process. If dust complaints are received, CBPPL will proceed through its complaint process, which may include added dust control or monitoring.

Noise and Vibration

What could happen: Construction will create temporary noise and vibration from equipment, road upgrades, trucking, earthworks, crane activity, turbine installation, and possible blasting. Noise may be most noticeable near access roads, active work areas, and locations used by cabin owners, recreational users, outfitters, and other land users. During operation, turbines and the substation will create sound. Sound from wind turbines is generally associated with moving parts and the movement of blades through the air (sometimes called a “swishing sound”) and may be more noticeable under some wind and weather conditions. Construction traffic along access routes may be more noticeable to some receptors than turbine construction activities farther from those receptors.

How effects will be managed: The Project is being designed to meet the 45 dBA noise guideline at nearby residences and seasonal cabins. Measures to reduce construction noise will include maintaining equipment, using mufflers and other noise controls, limiting or avoiding night-time construction activities, using reduced vehicle speeds, locating stationary equipment away from receptors where practical, and communicating with nearby residences (both permanent and cabin owners) and land users about work schedules. If blasting is required, it will be completed by a licensed contractor during daytime hours to the extent practical. Public notices will be used to advise residents of planned blasting events, and blasting will follow applicable safety requirements.

Monitoring or follow-up: A noise assessment was completed for nearby receptors. None of the receptors are located to exceed recommended sound levels. A complaint process will be in place and could include follow-up noise monitoring if complaints are received.

Water Resources and Fish Habitat

What could happen: Like most construction projects, some construction activities have the potential to affect water resources and fish habitat through clearing, grading, road upgrades, culvert installation or replacement, watercourse crossings, dewatering for foundations, concrete work, access road traffic, and accidental releases of fuel or other materials. Potential effects could include erosion, sediment movement, changes to surface drainage, temporary disturbance near watercourses, and changes to fish habitat where crossings or in-water work are required. The Wind Farm Site does not overlap a designated protected public drinking water supply area; however, the Trout Pond Protected Public Water Supply Area is located beside (approximately 165 m at the closest point) the existing transmission line right-of-way

near Massey Drive, and activities near that area will require specific regulatory review and approval. Waterbodies in the broader area may be used for recreation, such as fishing or boating, and private groundwater wells may be present in the surrounding region.

How effects will be managed: Planned surface disturbance will be set back 15 m from waterbodies and watercourses, unless a different approach is reviewed and authorized through permitting. Measures to protect waterbodies and watercourses include erosion and sediment controls, stable work areas, vegetated buffers, timing work to avoid high runoff periods when practical, and inspection and maintenance of drainage controls. Heavy equipment will not enter watercourses or waterbodies, unless frozen or authorized by permit. Watercourse crossings will be designed and installed to maintain drainage and fish passage where required, and work near water will follow applicable regulatory approvals and permit conditions. Climate projections and the potential for heavier rainfall events will be considered in drainage design, erosion and sediment control planning, and construction planning so that water management measures remain effective under variable weather conditions. Based on the current layout and separation distances, interactions with identified wells are not expected, but water protection measures will still be applied during construction.

Monitoring or follow-up: Before construction, CBPPL will complete additional field verification of watercourse crossings and prepare a Water Resources Management Plan addressing stream crossings and stormwater drainage. Where in-water work is required, timing windows, isolation of work areas, fish relocation, fish passage design, and habitat offsetting will be incorporated as required through regulatory review and permitting. If water is required for construction activities, such as for a concrete batch plant, applicable water use approvals will be obtained and management measures implemented.

Vegetation, Wetlands, and Rare Plants

What could happen: Construction may require clearing of common forest, shrub, and groundcover plants for turbine pads, access roads, collector lines, the substation, temporary work areas, and the transmission corridor. Wetland interactions may occur where infrastructure crosses or overlaps wetland features, and effects may include drainage changes, vegetation removal, dust on plants, temporary disturbance in wet areas, and the spread of invasive plant species through equipment movement, soil disturbance, or imported materials. Rare plant and plant species at risk records were identified within 15 kilometres of the Wind Farm Site's centre point, including black ash and Tradescant's aster; however, these records do not occur within the Wind Farm Site footprint.

How effects will be managed: Potential effects will be managed through use of existing disturbed areas where practical, limiting the work area, maintaining buffers around wetlands and watercourses, using erosion and sediment controls, limiting the construction footprint in wetland areas, managing dust, and stabilizing or reclaiming temporary work areas after construction. Equipment will be cleaned where needed to reduce the spread of invasive plants. Vegetation field studies, including targeted black ash and red pine surveys, will help confirm sensitive areas so that rare plant locations, if they exist within the wind farm footprint, can be avoided, flagged, or buffered as appropriate.

Monitoring or follow-up: Vegetation field studies, including targeted black ash and red pine surveys, and reclamation monitoring will be completed. Sensitive areas identified during surveys will be flagged, and buffers will be applied in line with regulatory requirements.

Birds and Bats

What could happen: Based on what has been documented from other wind farm projects, birds and bats may be affected by vegetation clearing, habitat changes, lighting, noise, dust, vibration, and turbine operation. Clearing could temporarily disturb birds and bats using nearby habitats, particularly during sensitive periods such as breeding, nesting, migration, and bat roosting. During operation, birds and bats could be injured or killed if they hit a wind turbine. Bats may also be injured by sudden air pressure changes near the turbines. There is also a low potential for birds to collide with vehicles, transmission lines, or other Project infrastructure. Several bird and bat species at risk may occur in the vicinity of the Wind Farm Site and may use suitable habitat within the Site during important periods such as migration, breeding, roosting, and wintering.

How effects will be managed: Mitigation will include limiting new clearing by using previously disturbed areas where practical, scheduling work outside sensitive timing windows where possible, flagging sensitive features if identified, maintaining buffers, managing dust, limiting lighting to what is needed for safe work, meeting Transport Canada lighting requirements, and applying worker wildlife protection practices. Vegetation clearing will be planned to reduce potential effects on nesting birds and important habitat features where practical. If active nests, roosts, or other sensitive features are identified, appropriate buffers or activity restrictions will be applied in consultation with regulators as required. During operation, bird and bat monitoring will be conducted, and adaptive management will be implemented where required. Operational adjustments, such as modified turbine cut-in speeds or curtailment during periods of higher bat activity, will be implemented where required through regulatory review and management planning. Specific management plans for birds and bats will be developed in consultation with regulators and will include specific direction for construction, operation, monitoring, reporting, and adaptive management.

Monitoring or follow-up: Bird and bat field studies began in April 2026 and will confirm the presence of birds and bats in Wind Farm Site and surrounding area. The results will inform final mitigation, management plans, and post-construction monitoring. Mitigation and monitoring plans for birds and bats will be developed, including an adaptive management framework so monitoring results can be reviewed and used to adjust mitigation if needed. Monitoring may include surveys during important seasonal periods and follow-up to assess bird and bat interactions with turbines during operation.

Other Wildlife

What could happen: Other wildlife may be affected if habitat is removed or changed, if animals avoid areas because of noise or human activity, or if increased traffic raises the risk of vehicle collisions. The Wind Farm Site and surrounding region support species such as moose, black bear, lynx, red fox, beaver, snowshoe hare, mink, otter, small mammals, and species of conservation concern such as Newfoundland marten and certain species of bees. Based on publicly available data, caribou are not expected to regularly occur within the Wind Farm Site, although occasional individuals may be present as the Project is near identified caribou habitat.

How effects will be managed: Effects on other wildlife will be reduced by limiting the Project footprint, using previously disturbed areas where practical, restoring disturbed areas, flagging, and buffering sensitive features, such as dens, if found, managing dust and lighting, proper waste storage and disposal, and applying worker wildlife protection practices. Speed limits and driver awareness measures will help reduce the risk of wildlife-vehicle collisions. Workers will be required to report wildlife encounters, den sites, injured wildlife, or observations that may require follow-up, and additional mitigation may be developed in consultation with regulators if field information shows it is needed.

Monitoring or follow-up: Marten hair snag surveys will be completed in suitable habitat within and near the Wind Farm Site. CBPPL will consult with Wildlife Division to determine appropriate follow-up programs for the wind farm. Monitoring results and discussions with regulators will be used to add or adjust mitigation measures if required.

Land and Resource Use

What could happen: Project construction may temporarily change access to some areas and may create noise, traffic, visual changes, and localized disturbance for land and area users. The Project will mainly use and improve existing forestry roads, rather than creating new access into previously undeveloped areas. Hunting was identified as a concern during engagement because the Wind Farm Site and surrounding area are used for moose hunting and other recreational and subsistence activities. The Wind Farm Site overlaps a small portion of Moose Management Area 7; however, this overlap represents a minor part of the broader management area, and access to the wider area would remain available through the existing road network. The area is also used for forestry, fishing, trapping, outfitting, cabin use, berry picking, snowmobiling, wood cutting, ATV use, and other outdoor activities. During operation, access to the site will be restored, however, land users may notice turbines, access roads, signage, safety controls, and maintenance activity.

How effects will be managed: The Project will reduce disruption to land users by limiting where work takes place, using existing roads where practical, maintaining access to the extent it is safe, posting signs in active work areas, and sharing information with Indigenous groups, local residents, land users and other interested parties about Project activities. Access may be temporarily restricted to select areas during construction for safety reasons. Restrictions would be localized and communicated in advance where practical. Public access will be restored following construction except in areas for safety or operation, such as the substation. No permanent restrictions on recreational and subsistence activities, such as hunting and fishing, are anticipated during operation.

Monitoring or follow-up: CBPPL will continue to engage with land users, including hunters and outfitters, as Project planning advances. Continued engagement and land and resource use information gathering will help CBPPL better understand how people use the area for hunting, fishing, outfitting, cabins, trails, and other activities, and will help identify practical measures to reduce disruption during construction. CBPPL will also develop and implement an Outfitter Environmental Effects Monitoring Plan in consultation with affected outfitters, regulators, and related organizations. This Plan will consider access to travel routes, timing of work where feasible, noise and disturbance controls, communication protocols, and monitoring during construction and early operation. Feedback received through engagement and the complaint process will be used to identify access or land use concerns that may require follow-up.

Nearby Cabins, Views, Shadow Flicker, and Public Experience

What could happen: Nearby residents may experience changes related to views, turbine sound, shadow flicker, and construction traffic along access routes. The Wind Farm Site is in a remote area that is well removed from major population centres (approximately 12 km from the City of Corner Brook municipal boundary). Although some permanent and seasonal residences, cabins, and recreational properties occur within 5 km of proposed turbines and along portions of the access road and transmission corridors, residential development in the vicinity of the Project is generally limited and dispersed and occur outside the 1,000 m minimum distance from a turbine. Smaller communities and residential areas with year-round residents are present near Pinchgut Lake and Georges Lake; however, these areas are outside the immediate Wind Farm Site and remain substantially separated from the nearest proposed turbines. The nearest identified receptor¹ is approximately 1,500 metres from the closest turbine. This is outside the standard minimum 1,000 m setback distance. Some people may be able to see turbines from their residence / cabin, but views will be limited by distance, hills, and existing vegetation. Construction traffic, road work, and temporary work areas may also be noticeable to people using cabins, recreational trails, and access roads.

How effects will be managed: The wind farm layout is being designed to reduce effects on nearby receptors. Turbine placement, distance, terrain, existing vegetation, traffic planning, equipment maintenance, reduced speeds, and communication with nearby land users will help reduce potential effects. The Project will maintain a minimum 1,000 metre setback from dwellings, assess noise and shadow flicker against accepted guidance, and use the complaint process to identify and respond to concerns raised by nearby land users. If the layout changes during detailed design, noise and shadow flicker assessments will be updated as needed and mitigation will be refined. Noise, visual effects, and shadow flicker have been assessed. Visual simulations were completed for representative locations and are included in the Visualization Study.

Monitoring or follow-up: Project-related concerns can be addressed through communication and the complaint process.

Traffic, Roads, and Construction Access

What could happen: During construction there will be increased traffic from workers, equipment, materials, and large turbine components moving between the Port of Corner Brook and the Wind Farm Site. For a 22-turbine Project, turbine component delivery is expected to require approximately 275 truckloads of turbines components and associated construction materials. Large components may require special transportation planning because of their size, route geometry, and physical constraints along the route from the Port of Corner Brook to Lady Slipper Road.

¹ 'Receptor' is defined as a structure that can be reasonably assumed to be habitable for a specified period of time and may include permanently or seasonally occupied residential, recreational, institutional, or commercial structures where individuals may be exposed to Project-related environmental effects (e.g., visual, shadow flicker, or noise).

How effects will be managed: Transportation will primarily use existing public roads, including the Trans Canada Highway and other provincial / municipal roads, and proposed wind farm access roads. A Traffic Impact Study and Traffic Management Plan are in-progress to understand construction traffic, large and heavy component movement, temporary and permanent roads, required road modifications or maintenance, capacity of bridge and crossing structures, communication during construction, and related permits. Route planning will include review of road geometry, bridge capacity, access points, protected road requirements, and permitting before large components are moved.

Monitoring or follow-up: CBPPL will continue to consult with the City of Corner Brook and Newfoundland and Labrador Department of Transportation and Infrastructure to define a route, and oversize and overweight vehicle permits will be obtained before moving large loads on provincial roads.

Economy, Employment, Housing, and Community Services

What could happen: The wind farm is expected to create short-term employment and business opportunities during construction. Construction of the Wind Farm Site is expected to directly employ about 275 workers. The construction of the wind farm is expected to support about 575 direct and indirect jobs and contribute more than \$57.5 million in local economic activity through subcontracting, materials, and service procurement. Some non-local workers may need temporary housing, and Project-related spending may increase demand for temporary accommodations, fuel, food services, maintenance, and other goods and services.

How effects will be managed: CBPPL plans to avoid long-term use of residential housing for workforce accommodations where feasible and will communicate expectations to contractors about using suitable temporary lodging. Procurement packages will consider the capacity and capabilities of local and regional Indigenous and non-Indigenous businesses. Workforce and procurement planning will include measures to support local participation, Indigenous and non-Indigenous business opportunities, and equitable access to employment, including gender-equity and diversity initiatives.

Monitoring or follow-up: CBPPL will share employment information with local communities and Indigenous groups in a timely way. Purchasing needs will be posted so local and regional businesses can prepare to compete for goods and services.

Historic Resources

What could happen: During construction, ground disturbance from excavation, blasting, road work, and site development could affect historic resources if such resources are present. These may include archaeological, cultural, spiritual, paleontological, or architectural resources. Areas with higher potential for historic resources will be identified through pre-construction review so that follow-up work can be completed before construction activities occur in those areas.

How effects will be managed: The Project will follow the historic resources review process and requirements of the Provincial Archaeology Office. Work areas may be adjusted, avoided, or further assessed if historic resources or areas of concern are identified before or during construction.

Monitoring or follow-up: A Stage 1 Historic Resources Overview Assessment will be completed before construction. If the Stage 1 Assessment determines fieldwork is required, a follow-up field survey will also be completed prior to the start of construction. If an archaeological site or artifact is found during construction, work will stop temporarily in that area, and the discovery will be reported to the Provincial Archaeology Office.

Waste, Hazardous Materials, and Emergency Response

What could happen: The wind farm will produce waste during construction, operation, and decommissioning, including domestic waste, construction waste, used oil and oil filters, petroleum products, lubricants, and other materials from equipment maintenance. Decommissioning will also generate waste from the removal of turbine components, including blades, generators, cables, and other equipment that will need to be reused, recycled, or disposed of. Accidental spills or improper storage of waste or hazardous materials could affect soil, water, vegetation, wildlife, or nearby land users if not properly managed.

How effects will be managed: A Waste Management Plan for the wind farm will describe how liquid and solid waste will be stored, handled, reduced, reused, recycled, and disposed of during construction, operation, and decommissioning. Waste will be stored securely, removed regularly, and disposed of at approved facilities. CBPPL will also consider options for repurposing and recycling wind turbine blades and generator components. The Waste Management Plan will be updated as needed over the life of the wind farm, including consideration of replacement, repurposing, recycling, and disposal options for turbine blades and generator components as technologies evolve. Additionally, the wind farm's Environmental Protection Plan will include measures regarding the storage and use of hazardous materials.

Monitoring or follow-up: An Emergency Response Plan will address environmental emergencies and worker safety incidents. It will include use of spill response kits, spill response training, and communication procedures to notify recreational and drinking water users and relevant authorities if needed.

Wind Farm Monitoring and Management Plans

Like for most large projects, a number of management plans will be developed and implemented before, during, and after project activities. These plans will provide guidance for environmental protection, construction practices, operations, maintenance, and future site closure activities. They will be implemented by CBPPL and will be included in tenders as requirements for contractors. Monitoring programs will also be conducted to evaluate Project performance and support adaptive management where required. These plans are expected to include:

- Environmental Protection Plan
- Bird and Bat Management Plan
- Bat Mitigation and Monitoring Plan
- Species at Risk Impacts Mitigation and Monitoring Plan
- Water Resources Management Plan
- Concrete Batch Plant Management Plan
- Traffic Impact Study
- Traffic Management Plan
- Waste Management Plan
- Emergency Response Plan
- Outfitter Environmental Effects Monitoring Plan
- Gender, Equity, Diversity, and Inclusion Plan
- Women's Employment Plan
- Indigenous Engagement Plan
- Public Engagement and Participation Plan
- Decommissioning and Rehabilitation Plan

Next Steps

Following submission, the Environmental Registration Document will go through a 45-day review period. During this period the Environmental Registration is available for review by government agencies, Indigenous groups, stakeholders, and the public. At the end of the review period, the Minister of Environment, Climate Change and Conservation will determine if the Project is released from the process, or if further assessment is required.

Once the Project is released from the environmental assessment process, additional permits and approvals will be required before construction can begin. As detailed design advances, CBPPL will confirm final infrastructure locations, complete required field studies, obtain applicable permits and approvals, and finalize management and monitoring plans before construction begins. Detailed design, transportation planning, field studies, management plans, and engagement activities will continue to refine how the Project is built, operated, monitored, and eventually decommissioned. CBPPL will continue to respond to questions, provide information, and consider feedback as planning advances.

Conclusion

Project Tuckamore combines forestry modernization, Mill upgrades, Deer Lake Power improvements, and a new wind farm as part of a long-term plan to support the Corner Brook Mill and the forestry sector in Newfoundland and Labrador. The proposed wind farm will provide renewable electricity for Mill operations, include up to 22 turbines, and be constructed over approximately three years.

The wind farm is planned within an actively managed industrial forest with existing forestry roads and resource access routes. The assessment considered potential interactions with atmospheric environment, water resources, vegetation and wetlands, birds and bats, other wildlife, the socio-economic environment, and land and resource use. Potential effects would be managed through Project design, setbacks, management plans, monitoring, regulatory review, and continued engagement.

The Corner Brook Mill and the associated forestry and power generation at Deer Lake have operated in Newfoundland and Labrador for over 100 years. CBPPL will continue to follow applicable legislation, permits, approvals, operating procedures, and environmental management requirements during construction, operation, maintenance, and eventual decommissioning. Environmental studies, consultation activities, and regulatory review are ongoing, and feedback will continue to inform Project planning and future decisions.

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Acronyms / Abbreviations

AAC	Annual allowable cut
AC CDC	Atlantic Canada Conservation Data Centre
CAAQS	Canadian Ambient Air Quality Standards
CBPPL	Corner Brook Pulp and Paper Limited
CML	Certificate of Managed Lands
CofA	Certificate of Approval
COSEWIC	Committee on the Status of Endangered Wildlife in Canada
CSD	census subdivision
CTL	cut-to-length
DFO	Fisheries and Oceans Canada
DLP	Deer Lake Power
EA	environmental assessment
ECCC	Environment and Climate Change Canada
EEM	environmental effects monitoring
EMS	Environmental Management System
EPP	Environmental Protection Plan
ERP	Emergency Response Plan
ESCP	Erosion and Sediment Control Plan
FTE	full-time equivalent
GHG	greenhouse gas
GIS	geographic information system
Hatch	Hatch Ltd.
Kruger	Kruger Inc.
MDTS	Massey Drive Terminal Station
MGGA	<i>Management of Greenhouse Gas Act</i>
MGGR	<i>Management of Greenhouse Gas Regulations</i>
NL	Newfoundland and Labrador
NL AQS	Newfoundland and Labrador Air Quality Standards
NLDECCC	Newfoundland and Labrador Department of Environment, Conservation and Climate Change
NLDEM	Newfoundland and Labrador Department of Energy and Mines

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NLDFAL	Newfoundland and Labrador Department of Forestry, Agriculture and Lands
NLDTI	Newfoundland and Labrador Department of Transportation and Infrastructure
NL ESA	Newfoundland and Labrador <i>Endangered Species Act</i>
NO ₂	nitrogen dioxide
NOC	national occupational classification
O ₃	ozone
PM _{2.5}	particulate matter smaller than 2.5 microns
PM ₁₀	particulate matter smaller than 10 microns
PPWSA	Protected Public Water Supply Area
QFN	Qalipu First Nation
RoW	right-of-way
SAR	species at risk
SARA	<i>Species at Risk Act</i>
SCADA	supervisory control and data acquisition
SFI®	Sustainable Forestry Initiative
SOCC	Species of Conservation Concern
SO ₂	sulphur dioxide
TCH	Trans-Canada Highway
the Mill	Corner Brook Pulp & Paper Mill
the Project	Project Tuckamore
TPM	total particulate matter
TUS	Traditional Use Study
WMP	Waste Management Plan
WRMD	Water Resources Management Division
WTG	wind turbine generator

Units of Measure

%HA	percent highly annoyed
°C	degrees Celsius
asl	above sea level
bbls	barrel
CO ₂ e	carbon dioxide equivalent
dBa	decibel (A-weighted)
ha	hectare
Hz	hertz
km	kilometre
km ²	square kilometre
kPa	kilopascal
kt	kilotonne
kV	kilovolt
kVA	kilovolt-ampere
m	metre
m ²	square metre
m ³	cubic metre
m/s	metres per second
mm	millimetre
MV	megavolt
MVA	megavolt-ampere
MW	megawatt
ppb	parts per billion (by volume)
t	tonne
V	volt
µg/m ³	micrograms per cubic metre

1 Introduction

Kruger Inc. (Kruger) and its subsidiary Corner Brook Pulp & Paper Limited (CBPPL), own and operate the Corner Brook Pulp & Paper Mill (the Mill), located in Corner Brook, Newfoundland and Labrador (NL). The Mill produces newsprint paper from a thermomechanical pulping process and is primarily powered by the Deer Lake Power (DLP) and Watson's Brook hydroelectric generating facilities, also owned by Kruger. For over a century, these facilities have been integral to the economy of western NL and provincial forest sector. Over successful and depressed market cycles, the Mill has been a major contributor to the regional economy and specifically supported forestry activities and a broader supply chain of harvesting, transportation, and services, while providing long-term employment and contributing to the stability of rural communities in the region.

Over the past two decades, newsprint, which is CBPPL's primary product, has experienced a global decline in consumption of almost 80%. The resultant pressure on pricing has made the operation no longer sustainable. However, building on its long operating history, key natural advantages, and an understanding of its role in the regional economy, Kruger and CBPPL are undertaking a revitalization initiative to modernize forestry operations, upgrade Mill site infrastructure and processes, improve infrastructure at DLP, and further develop a renewable energy source (i.e., wind farm). Together, these elements comprise Project Tuckamore (the Project; Figure 1.1). This ambitious Project builds on long established assets and leverages new innovations to sustain and diversify Kruger's operations in the province.

The Project will build from an established workforce that will modernize harvesting, manufacturing, transportation, silviculture, and logistics to allow long-term sustainability of the Mill, add value to the forestry assets sent to sawmills, and integrate predictable, reliable and constant renewable power to the NL electricity grid. This Project will alter processes and products at the Mill, making it the first paper producing mill to operate on alternative power which will be supported by energy from a new dedicated wind farm. This innovative approach will result in the reduction of oil use at the Mill and allow antiquated assets to be decommissioned. The Project will sustain and diversify Kruger's operations in the region, permit the expansion of sawmill partners, and continue to contribute to the overall well-being of nearly 1,000 direct and indirect employees and their families into the future.

As a key component of the revitalization, CBPPL proposes the development of a wind farm with a capacity of up to 155 megawatts (MW), along with associated transmission infrastructure. The wind farm is designed to enhance the sustainability and renewable energy supply for its operations in western NL. The objective of this initiative is to reduce reliance on conventional energy sources by generating clean, renewable power that will directly support the operations of the Mill and allow for reliable, firm electricity from DLP to be provided to the provincial grid.

The development of a wind farm and associated infrastructure requires an Environmental Registration under the *Environmental Assessment Regulations* of the NL *Environmental Protection Act*. This document, therefore, serves as the Environmental Registration and is being submitted for review and approval to the NL Department of Environment, Conservation and Climate Change (NLDECCC) – Environmental Assessment (EA) Division. The Environmental Registration outlines the scope of the Project, details anticipated benefits, such as enhanced sustainability and economic growth, and describes the measures that will be implemented to mitigate environmental and socio-economic effects during both construction and operational phases of the Project.

Project Tuckamore Environmental Assessment Registration
Section 1 Introduction
 September 2026

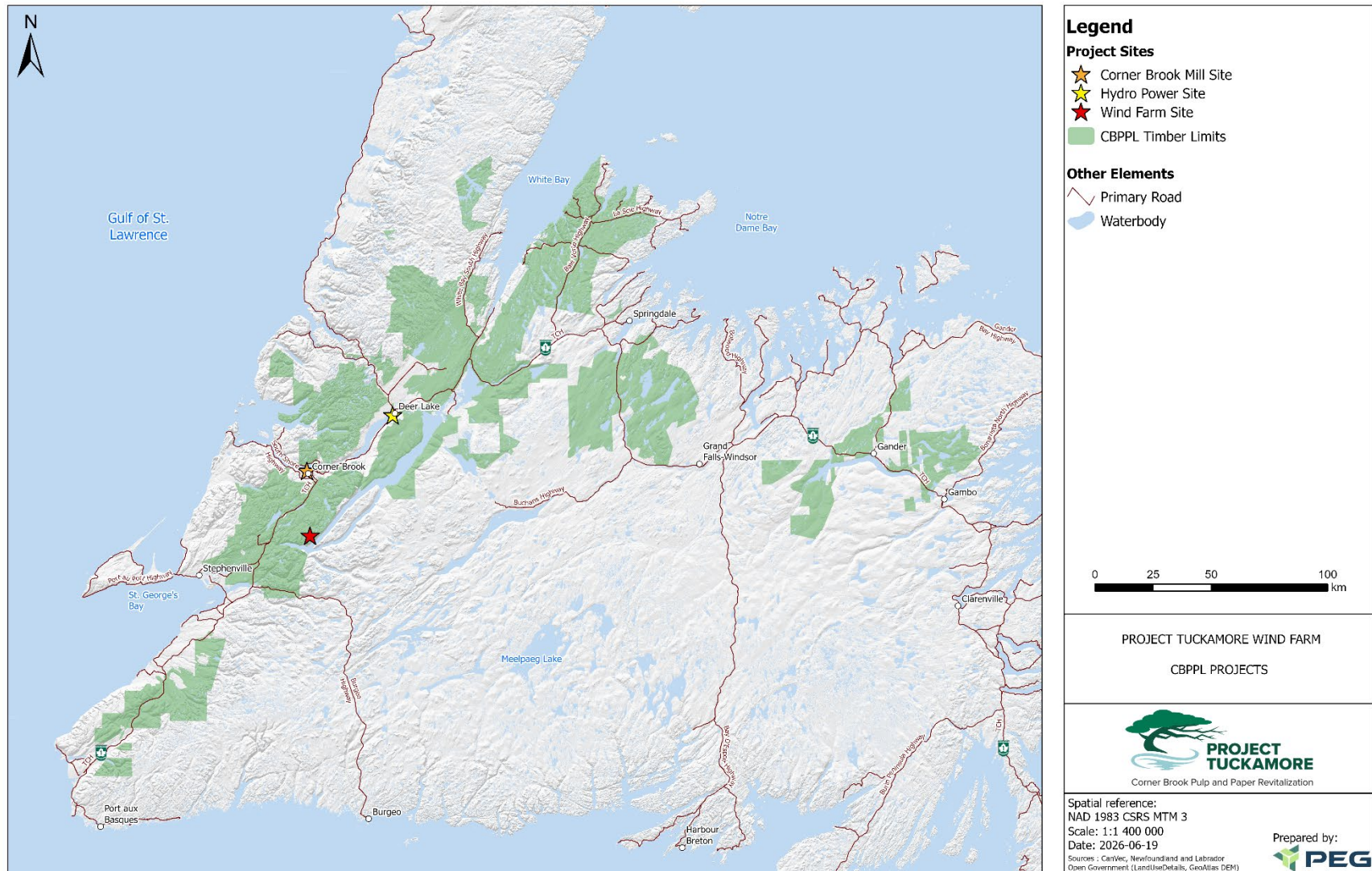


Figure 1.1 Project Location

1.1 Project Overview

The Project will include modernization of existing operations, upgrades to site infrastructure, and investments in renewable energy. Key Project components include:

- **Forestry Modernization:** CBPPL will modernize tree harvesting and change the way it works with sawmills on the Island of Newfoundland. This will include a transition to full-tree harvesting with roadside sorting / chipping, increased sawlog production across the Island, new chipping and biomass capabilities, and expanded contractor and trucking opportunities to reduce fibre costs and support sawmill growth. The change will allow CBPPL to sell a higher value product (sawlogs) to sawmills and in return purchase lower cost chips and biomass, thereby changing the economics to create more viable operations for those involved. The changes involved with forestry modernization, including an increased silviculture program and increase in the required annual allowable cut (AAC) to 723,000 cubic metres (m³), have been discussed with Newfoundland and Labrador Department of Forestry, Agriculture and Lands (NLDFAL) and are covered under existing Five-Year Forestry Operating Plans and existing permits. Additional details are provided in Section 1.4.1 and Appendix A.
- **Mill Site Upgrades:** Mill operations will be modernized to integrate variable renewable energy, conversion from use of logs to wood chips, increase pulp storage capacity, and invest in cogeneration (cogen) power from biomass to boost firm power while eliminating steady state fuel oil use, reducing emissions and improving long term sustainability. CBPPL will also decommission the oil tank farm and associated pipeline. Operational upgrades at the Mill are covered under a Certificate of Approval (CofA), which will be modified with the necessary regulators as industrial processes change, and overall site emissions are lowered. Additional details are provided in Section 1.4.2 and Appendix B.
- **Hydro Power (Deer Lake Power and Watson's Brook):** DLP hydro power infrastructure will be upgraded, penstocks will be replaced, generation will be converted to full 60 cycle operation, and advanced controls will be installed to deliver up to 148 MW of firm renewable power. Similar upgrades will occur, at a smaller scale, at Watson's Brook. This change will turn DLP into an energy asset for the province and a revenue generator for Kruger, generating funds for further enhancement to occur at the Mill, possible through the development of the wind farm to provide power for the Mill. Activities at the hydro sites will align with existing operational requirements and adhere to relevant provincial and federal requirements, including compliance with water rights legislation. Upgrades and other works at the two hydro sites will be conducted within existing water licences and permits in consultation with Water Resources Management Division (WRMD). Additional details are provided in Section 1.4.3 and Appendix C.
- **Wind Farm:** The proposed wind farm will be located southwest of Corner Brook, on lands within CBPPL timber limits. The area is an industrial forest and has been commercially harvested, with well established roads and select silviculture techniques applied in adjacent areas. The wind farm will have an installed capacity of up to 155 MW, and based on preliminary design details, include up to 22 wind turbine generators (WTGs) with 7 MW capacity. WTGs will be strategically placed across elevated terrain to maximize wind capture, considering topography, nearby receptors, environmental and human constraints, regulations, access, and interconnection needs. Construction will involve upgrades to existing access roads and development of new roads, WTG

pads, foundations, crane pads, and laydown areas. Existing public and forestry roads will be used wherever feasible. Aggregate sources for road development may be selected on-site or locally, pending engineering and permitting. Electrical infrastructure will include 34.5 kilovolts (kV) collector lines connecting the WTGs to a 230 kV substation, with power transmitted via a new 230 kV transmission line to the Massey Drive substation where it will be connected to the existing grid that feeds into the Mill. This wind farm will enable lands that had been used for commercial forestry operations to become a renewal energy source intended to sustain the Mill's operations. Development of the wind farm will comply with industry best practices, regulatory laws and guidelines governed by conditions of release from the EA process.

For the Project to achieve its goals, these four components need to evolve simultaneously. Forestry operations need to adapt to meet the demands of sawmills, while the Mill needs to upgrade to diversify their product and produce in a more energy efficient manner. Similarly, DLP must undergo changes to provide firm and reliable power to the NL grid, while the wind farm will need to supply renewable power to the Mill. While each component possesses an established regulatory pathway when considered independently, the wind farm would not be viable for CBPPL as a standalone project. Consequently, the Project (Project Tuckamore) integrates each of these elements.

1.2 Description of the Proponent

CBPPL, a subsidiary of Kruger Inc., serves as the proponent for the Project. CBPPL is being supported by the Kruger Energy Division of Kruger Inc., which has recent experience in constructing and operating four wind farms located in Quebec and Ontario. The divisions of Kruger Inc. are shown in Figure 1.2, and the organizational hierarchy of these entities is illustrated in the Figure 1.3.

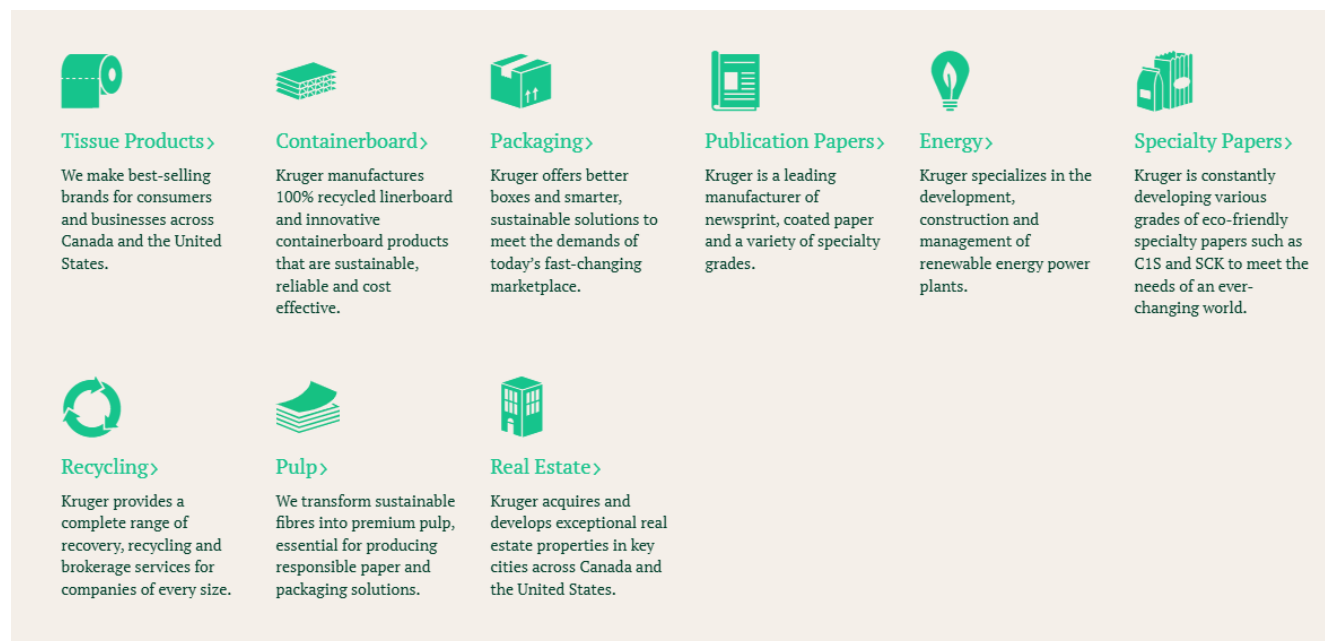


Figure 1.2 Divisions of Kruger Inc.

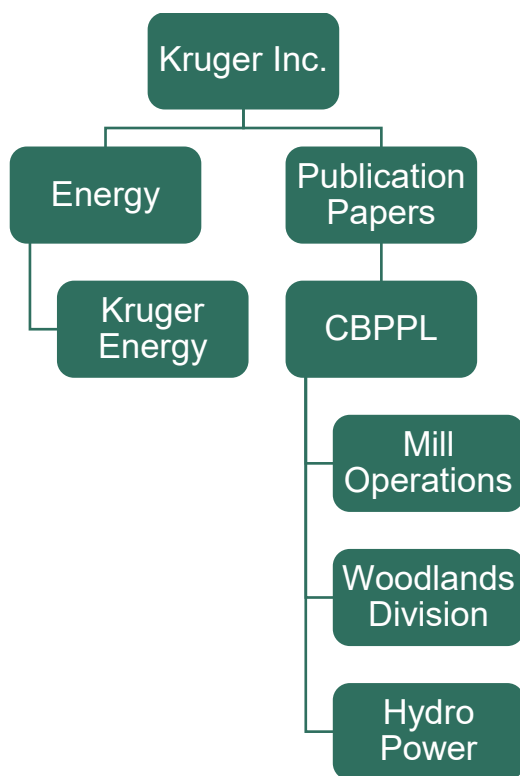


Figure 1.3 High Level Corporate Organization of Kruger and CBPPL

1.2.1 Kruger Inc.

Founded in 1904 and headquartered in Montréal, Québec, Kruger is one of Canada's largest and most diversified companies in the fields of paper, packaging, tissue, biomass, renewable energy, and recycling. Kruger operates 19 manufacturing and production facilities across Canada and the United States, and 47 renewable power plants. The company is known for its strong commitment to environmental stewardship, responsible resource management, and continuous innovation. Kruger is committed to developing projects in harmony with the goals of local communities and a comprehensive approach to sustainable development. Kruger's commitment to sustainability is reflected in its operations, including the implementation of environmental management systems and adherence to internationally recognized standards such as ISO 14001 and the Sustainable Forestry Initiative (SFI®) Forest Management Standard. Kruger's leadership in sustainable business practices and innovation is an important asset to CBPPL.

1.2.2 Kruger Energy

For over 20 years, Kruger Energy has been actively contributing to reducing greenhouse gas (GHG) emissions from their operations across Canada, the United States, and Guatemala, with over 47 green energy projects and over a total installed capacity of 650 MW (Figure 1.4). Through these operations, Kruger has developed frameworks that adhere to the principles of sustainable development, accounting for the well-being and needs of future generations.

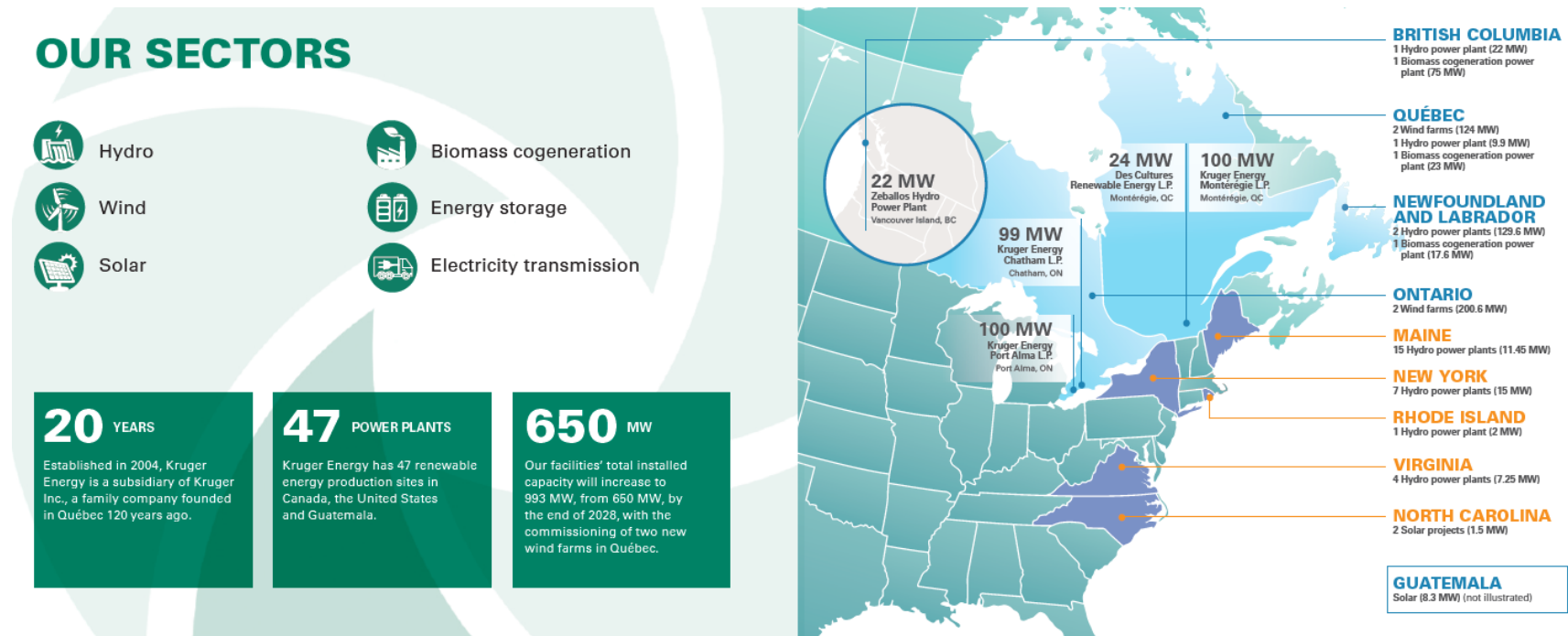


Figure 1.4 Kruger Energy and Renewable Power Generation Sites

While Kruger has traditionally used hydroelectric generation for power, a substantial portion of Kruger Energy's portfolio is now dedicated to wind power generation. The company has developed, constructed and operated numerous wind projects, particularly in Canada, where wind energy is a growing sector. These wind farms are strategically located in regions with favourable wind conditions, such as Quebec and Ontario, and contribute substantially to Kruger's total installed green energy capacity. Each project is designed to optimize energy output while limiting environmental effects, using advanced WTG technology and adhering to environmental standards.

Kruger Energy's wind projects not only supply clean, renewable electricity to local communities but also support regional economic development by creating jobs and fostering partnerships with municipalities and Indigenous groups. The company's commitment to sustainable development is reflected in its engagement with interested parties throughout the planning, construction, and operational phases of each wind farm.

1.2.3 Corner Brook Pulp and Paper Limited

The Mill and DLP have been operating in western Newfoundland since 1925 and is still an economic driver and the largest private employer in western Newfoundland. CBPPL is one of the largest industrial employers on the west coast of NL, providing direct employment for 380 skilled workers at the Mill, Woodlands Operations, and DLP. In total, CBPPL has a direct impact of over 1,000 jobs in the provincial forestry industry through contractors, transportation, and service providers. CBPPL's continued operation provides a cornerstone to the economic growth of the City of Corner Brook and surrounding communities, supporting local businesses, municipal revenues, and multi-generational families whose livelihoods have been tied to the Mill for decades. Beyond direct employment, the Mill plays a central role in community identity and pride, reflecting the long history of Corner Brook as a pulp and paper town and as a cornerstone of the provincial industrial base.

CBPPL is at the centre of the provincial forest sector, acting as a sustainable and internationally certified harvester of fibre across large regions of the Island. Its operations support forest management, harvesting, silviculture, and transportation activity, creating economic linkages that sustain sawmills, logging contractors, and rural communities throughout the Island's supply chain. CBPPL is at the centre of the provincial forest sector, acting as the sustainable and internationally certified harvester of fibre across large regions of the Island. Its operations support forest management, harvesting, silviculture, and transportation activity, creating economic linkages that sustain sawmills, logging contractors, and rural communities throughout the Island supply chain. As governments and industry work to stabilise and diversify the sector, CBPPL remains a key platform for future investment, value-added wood products, renewable energy integration, and long-term utilization of the province's forest resources, reinforcing its strategic importance to the overall health and resilience of the NL forestry industry.

CBPPL has proactively responded to evolving industry standards by adopting sustainable practices and modernizing its production processes to retain competitiveness in the global market. The frameworks established by Kruger and Kruger Energy guide CBPPL's operations and maintain adherence to ecological integrity and regulatory compliance.

CBPPL operates according to five core principles of sustainability—environmental, economic, political, social, and cultural—which are integrated into its strategic decision-making, daily operations, and long-term goals. To uphold these principles, CBPPL has implemented a robust Environmental Management System (EMS) certified to ISO 14001, as well as the SFI® Forest Management Standard for the forestry operations, which provides a structured framework for identifying, monitoring, and mitigating environmental effects, and complying with provincial planning requirements and environmental protection guidelines. Regular audits and continuous improvement initiatives sustain certification and drive further advances in environmental performance. Through these efforts, CBPPL contributes to the province's transition towards a more sustainable economy, aligning with Kruger's broader vision of achieving sustainable prosperity by balancing economic growth, environmental stewardship, and social responsibility.

CBPPL divides its operations among several divisions. The divisions included in the Project include Mill Operations, the Woodlands Department, and DLP. The following provides more details about each division.

- **Mill Operations:** This department is responsible for managing the manufacturing processes at the Mill, including the production of paper and related products. Its operations are central to the manufacturing of newsprint and other paper products, which serve both domestic and international markets. The Mill employs advanced papermaking technology and machinery to convert raw wood materials into finished paper products. This department oversees the operation of machinery and quality control and maintains efficient workflow within the Mill premises. Mill Operations is also responsible for logistics, biomass cogeneration electrical facilities, as well as monitoring and reporting as required by existing permits and Certificate of Approval (CofA).
- **Woodlands Department:** CBPPL Woodlands Department manages approximately 1.3 million hectares (ha) of Crown land on the Island of Newfoundland, referred to as their licenced timber limits. The provincial government has responsibility to supervise, control, and direct various activities relating to forest resources on Crown lands, and on their limits (Figure 1.1). CBPPL is responsible for: preparing timber management plans for areas of productive forest; constructing and maintaining forest access roads and bridges during harvesting activities; harvesting timber; and carrying out programs of reforestation and silviculture. CBPPL's Woodlands Division has actively adopted sustainable forest management strategies, which include responsible harvesting, regeneration, and protection of forest resources. This approach, certified to internationally recognized standards of sustainability, is designed not only to support the long-term viability of NL's forests, but also to enhance community well-being and maintain ecosystem health.
- **DLP:** DLP is a division within CBPPL that generates hydroelectric power to support the company's operations. DLP, located in the Town of Deer Lake, harnesses water resources to produce renewable electricity, which is used to run the Mill and other company infrastructure. The hydro plant contributes to CBPPL's sustainability initiatives by providing a reliable, clean energy source and reducing dependence on fossil fuels. DLP is responsible for maintaining the hydroelectric equipment, monitoring water levels, compliance with provincial regulations, and optimizing energy production to meet operational needs.

1.2.4 Proponent Contact Information

Contact information for this Environmental Registration is provided in Table 1.1.

Table 1.1 Proponent Information

Name of the Corporate Body	Corner Brook Pulp and Paper Limited
Address	1 Mill Road, Corner Brook, NL
Kruger VP & COO, Publication Papers	Roman Gallo Email: Roman.Gallo@kruger.com
Principal Contact for Environmental Assessment	Chris Pembroke, Manager of Engineering Email: Chris.Pembroke@kruger.com

1.3 Need / Purpose / Rationale

Since 2001 global newsprint / news paper consumption has decreased from 38 million metric tonnes to 8 million tonnes. This reduction in global demand has resulted in constant price pressures for newsprint and resulting global production rationalization. These pressures have resulted in CBPPL reducing its overall production levels to remain competitive in a challenging global marketplace.

Despite CBPPL's advantages of low power costs, favorable fibre cost, and proximity to international container shipping, the decrease in global paper supply continues to outpace demand resulting in pricing that will continue to directly impact sustainability. Currently, the Mill operation is dependent on newsprint production which consumes the natural advantages of CBPPL while not providing a long-term future. Without this revitalization Project, there is no economically sustainable path forward for the Mill operation.

The proposed solution is to pivot Mill operations to diversify into multiple operational streams. This will increase the resilience of CBPPL by changing its current dependence on paper as its primary product. CBPPL will be revitalized to create multiple operating streams including sawlog production, paper production, and renewable energy. Through this diversification of operations, CBPPL will be sustainable in the long-term and will leverage its key advantages including a skilled workforce, renewable fiber, paper-making knowledge, and renewable energy production. While CBPPL will move away from a full dependence on paper production, paper manufacturing will remain a critical component of the operation into the future in order to balance the forest sector. Corner Brook has strong customer relationships and delivers a high-quality paper product to regions with a long-term market outlook. Within the revitalization Project, the Corner Brook Mill will be in an improved position to migrate to other specialty papers in the future.

This transition will be achieved by modernizing the way the CBPPL's Woodlands Division harvests wood and works with sawmills on the Island to provide fibre only for sale to local sawmills and stopping roundwood use at the Mill. In return, the sawmills will provide residuals in the form of chips and biomass for consumption in the paper making process. The Mill site will improve the ability to receive and store chips and biomass as well as dry the biomass to eliminate steady state oil use. A wind farm will be built to provide power to produce paper while the firm electrical capacity and energy from DLP, Watson's Brook, and the Mill cogen facility will be sold to NL Hydro.

This innovative solution to addressing Mill sustainability will create a fully renewable energy supply to support the ongoing production of paper at the Mill and make CBPPL a renewable energy hub. This solution will protect the 1,000 direct jobs in the provincial forest sector, including 377 direct employees at CBPPL and employees at the three provincial sawmills. Approximately \$700 million will be spent in the execution of the Project, creating over 713 full-time equivalent (FTE) jobs and injecting \$57.5 million into the local economy. It will allow the Mill to pay back its debt to the Newfoundland government and will provide a reliable, firm energy supply to the provincial energy grid to meet expected demand. This Project will solidify the forestry and manufacturing sector in western Newfoundland for many years to come.

1.4 Regulatory Framework

1.4.1 Forestry Operations

Currently CBPPL operates in seven Forest Management Districts (5,6,9,10,14,15, and 16) located in four Planning Zones. Each Zone has a requirement to submit a Five-Year Operating Plan which is registered with NLDECC. CBPPL is responsible for the development of proposed operating areas, harvest blocks, primary road networks, bridge installation sites, and silviculture areas in these submissions. The Five-Year Operating Plan involves a timber supply analysis including harvest levels that are expected to be sustainable for 160 years. Some of the considerations included in calculating harvest levels include the operable growing stock, minimum block sizing, block adjacency, overmature forest requirements, wildlife habitat constraints, and silviculture inputs. Each Plan also includes review of other resources (environmental and socio-economic), mitigation measures, public input, and information on GHG management and carbon budget modeling.

Annual allowable cut levels are allocated by District and form the basis for developing the Five-Year Plans. These plans may include up to ten years' worth of annual cut allocations, providing operational flexibility over the five-year term.

The development of each five-year plan also involves a public consultation process. Draft plans are posted on CBPPL's website for public feedback, and information is distributed to interested parties that have been engaged over the past decade through an established consultation list. Feedback and suggested mitigation are considered and incorporated before the final plan is submitted.

In addition to the five-year plans, CBPPL submits Annual Operating Plans to the NLDFAL every year by November 15. These annual plans provide details on the stand-level activities planned for the year, including commercial harvest areas, resource road construction, bridge installation locations, and silviculture sites. Both the Forestry and Wildlife Divisions of NLDFAL review these plans, and a Certificate of Managed Lands (CML) is issued upon approval. Each operating area within the CML is assigned one of three statuses: approved, approved with conditions, or not approved.

CBPPL will continue to engage with the Department regarding wood supply modelling, sustainable annual allowable cut determinations, silviculture planning, and Spruce Budworm management, with these initiatives being advanced through the Company's five-year forest management planning process, including the most recently submitted Five-Year Operating Plan for FMD 22.

This annual reporting process gives the Minister of NLDFAL the opportunity to review and comment on proposed forestry activities, so that they comply with provincial and federal legislation. It also allows for the identification of issues or concerns related to sustainable forest management, environmental impacts, and financial considerations associated with timber licensing and forest management practices. Currently the approved plans include:

- Zone 3 – 2022-2026 EA 2146² (a new plan to be submitted 2026)
- Zone 5 – 2026-2030 EA 2367
- Zone 6 – 2024-2028 EA 2256
- Zone 7 – 2022-2026 EA 2145 (a new plan to be submitted 2026)

CBPPL will maintain its established reporting protocols by preparing annual reports and five-year plans as required. Activities associated with forestry modernization will be within currently approved AAC limits. There are no plans to revise the five-year management plans at this time, as current strategies remain aligned with provincial standards. In consultation with the Climate Change Branch and in the approval of the five-year operating plan, CBPPL will work with applicable regulators to support provincial reporting initiatives, aiding decision-making for environmental policy.

1.4.2 Mill Site

CBPPL's operations in NL are regulated by a number of provincial and federal departments / agencies. Mill Site operations are currently governed by CofA from the Pollution Prevention Division of NLDECCC. The CofA is for the operation of the pulp and paper mill and other associated works, including a steam plant, wood yard, an effluent treatment system, cogen facility, and site infrastructure located in Corner Brook, NL. CBPPL will work with the Pollution Prevention Division of NLDECCC to update their CofA to reflect the changes to Mill operations. This will include analysis of updated emissions sources, specifically dryer exhaust and boiler modifications. These changes will be addressed through established permitting pathways and emissions from both the dryer and the boiler are evaluated and will remain compliant with regulatory standards. By following these current permitting processes, the facility demonstrates its commitment to responsible emissions management and ongoing regulatory compliance. This approach also provides flexibility to adapt to future changes in regulations or operational needs, supporting the site's long-term sustainability objectives. Updated air dispersion modelling will be completed through the revised CofA, in consultation with Pollution Prevention Division and Climate Change Branch.

The *Pulp and Paper Effluent Regulations*, administered by Environment and Climate Change Canada (ECCC), are aimed at controlling and reducing the release of harmful substances from pulp and paper mills into water bodies. These regulations set specific limits on the quantity and quality of effluent that mills can discharge, including parameters such as biochemical oxygen demand, total suspended solids, and toxicity. CBPPL is required to regularly test and report these parameters to demonstrate compliance, and failure to meet standards may result in corrective actions or penalties. As part of these regulations, CBPPL is required to conduct environmental effects monitoring (EEM) programs. Monitoring requirements under the regulations are not static; therefore, the proposed refinements to the Mill, the scope and

² Refers to the unique identification number assigned to each registered project by EA Division.

frequency of monitoring may be adjusted to reflect these changes. Through consultation with ECCC, CBPPL will confirm their monitoring protocols are aligned with the modifications to the Mill. With the ongoing compliance, adaptation, and reporting, CBPPL will continually demonstrate that its effluent management practices meet or exceed regulatory standards, actively safeguarding the health of local waterways and ecosystems.

The oil tank farm and pipeline will be decommissioned and oil tanks removed, in consultation with the Pollution Prevention Division. At this time, the end use of the site has not been determined. Decommissioning activities will be carried out in accordance with relevant environmental standards and regulatory requirements, and the site will be safely prepared for potential future uses, which will be decided once further information is available.

1.4.3 Hydro Power

In consultation with NL Hydro, a System Impact Study has been initiated and is currently in progress to assess the Project's proposed interconnection to the provincial electrical grid and identify system upgrades and operational considerations needed to support reliable integration of the Project. The outcomes of this work will continue in coordination with NL Hydro as Project planning progresses.

CBPPL will work with regulators to understand the permits required to undertake upgrades at the DLP and Watson's Brook sites, including compliance with water rights legislation through consultation with WRMD. Project works will be conducted in compliance with existing water licences and necessary permits, with ongoing monitoring for the protection of water resources.

CBPPL has completed seven penstock replacements at DLP since 2015. These were permitted through the Town of Deer Lake and NLDECCC and planned penstock replacements will follow similar permitting and management measures. Electrical and protection system upgrades are required to be designed and operated in compliance with the Canadian Electrical Code, as adopted by NL, and follow provincial variances issued by Service NL. Dam safety will be maintained through regular inspections and reporting, in accordance with provincial dam safety regulations, including implementation of updated risk assessment protocols and emergency preparedness plans. Coordination with authorities (municipal, provincial, and federal) will be ongoing to facilitate timely permitting and continued compliance throughout all phases of the Project.

1.4.4 Wind Farm

As a power generation project in NL, the wind farm is required to be registered with the provincial EA Division of NLDECCC under the NL *Environmental Protection Act* and *Environmental Assessment Regulations*. This Environmental Registration has been prepared in accordance with *Environmental Assessment – A Guide to the Process* (NLDECC 2025a). The *Guidance for Registration of Onshore Wind Energy Generation and Green Hydrogen Production Projects* (NLDECC 2023) was also considered which outlines requirements specific to onshore wind projects in the province. The Project does not include activities requiring federal assessment as listed in the *Physical Activities Regulations* under the *Impact Assessment Act*. As per correspondence on June 9, 2026, the Impact Assessment Agency of Canada is of the opinion that, as proposed, the Project is not described in the Regulations.

In addition to provincial release from the EA process, the wind farm is subject to other federal and provincial legislation (Table 1.2).

Table 1.2 Federal and Provincial Legislation that Could Apply to the Project

Federal Legislation	Provincial Legislation
• <i>Fisheries Act</i> • <i>Canadian Environmental Protection Act, 1999</i> • <i>Species at Risk Act</i> • <i>Migratory Birds Convention Act, 1994</i> • <i>Canadian Navigable Waters Act</i> • <i>Aeronautics Act</i> • <i>Explosives Act</i> • <i>Civil Air Navigation Services Commercialization Act</i>	• <i>Endangered Species Act</i> • <i>Environmental Protection Act</i> • <i>Forestry Act</i> • <i>Historic Resources Act (1985)</i> • <i>Lands Act</i> • <i>Electrical Power Control Act</i> • <i>Quarry Materials Act</i> • <i>Water Resources Act</i> • <i>Works, Services and Transportation Act</i> • <i>Urban and Rural Planning Act</i> • <i>Wild Life Act</i>

Upon release / approval from the provincial EA process the wind farm will require approvals, authorizations, and permits prior to initiation of construction. A preliminary list of potential requirements for the wind farm is included in Table 1.3. The specific permits and approvals required will depend on the final development plan.

Table 1.3 Environmental Permits, Approvals, and Authorizations that may be Required for the Project

Permit / Approval / Authorization	Legislation / Regulation	Authority / Department
Provincial		
Release from EA Process	<i>Environmental Protection Act</i>	NLDECCC – Minister
Application for Environmental Permit for Alterations to a Body of Water	<i>Water Resources Act</i>	NLDECCC – WRMD
Certificate of Approval for Generator Operation	<i>Environmental Protection Act, Air Pollution Control Regulations</i>	NLDECCC – Pollution Prevention Division, Industrial Compliance Section
Permit to Engage in an Economic Activity	<i>Endangered Species Act</i>	NLDECCC / NLDFAL – Wildlife Division
Permit to Conduct Research on a Threatened Species Under the <i>Endangered Species Act</i> of Newfoundland and Labrador		
Permit to Destroy Problem Animals		
Licence to Lease (or Grant) Crown Lands	<i>Wild Life Act</i>	
	<i>Lands Act</i>	NLDFAL – Crown Lands Division

Table 1.3 Environmental Permits, Approvals, and Authorizations that may be Required for the Project

Permit / Approval / Authorization	Legislation / Regulation	Authority / Department
Operating Permit	Forestry Act	NLDFAL – Forestry Division
Permit to Burn		
Permit to Cut Crown Timber		
Highway Access Permit	Works, Services and Transportation Act Urban and Rural Planning Act, Protected Road Zoning Regulations	NL Department of Transportation and Infrastructure (NLDTI) – Government Services Centre
Permit to Work within Departments Right of Way	Works, Services and Transportation Act	NL Department of Transportation and Infrastructure (NLDTI) – Government Services Centre
Protected Road/Area	Urban and Rural Planning Act, Protected Road Zoning Regulations	NL Department of Municipal and Community Affairs – Government Services Centre
Quarry Development Permit	Quarry Materials Act	NL Department of Energy and Mines (NLDEM) – Mining and Mineral Development
Electrical System Interconnection	Electrical Power Control Act	NL Hydro / Public Utilities Board of NL
Electrical Permits	Public Safety Act, Electrical Regulations	NL Department of Government Services
Fuel Storage Tank Registration	Environmental Protection Act, Storage and Handling of Gasoline and Associated Products Regulations	
Federal		
Authorization or Letter of Advice	Fisheries Act	Fisheries and Oceans Canada (DFO)
Approval to Interfere with Navigation	Canadian Navigable Waters Act	Transport Canada
Aeronautical Assessment Form Obstruction Clearance Notification/Permit	Standard 621 of the Canadian Aviation Regulations (CARs) - Obstruction Marking and Lighting Aeronautics Act	
Migratory Bird Permit Nest Removal Permit	Migratory Birds Convention Act, Migratory Birds Regulations, 2022	Environment and Climate Change Canada (ECCC) – Canadian Wildlife Service
Permits Authorizing an Activity Affecting Listed Wildlife Species	Species at Risk Act	
License to Store, Manufacture, or Handle Explosives	Explosives Act	Natural Resources Canada
Letter of Non-Objection	Civil Air Navigation Services Commercialization Act	Department of National Defense
Land Use Proposal	Aeronautics Act	NAV CANADA

A review of municipal planning boundaries indicates that the majority of the wind farm components, including the Wind Farm Site and transmission line, are located outside of nearby designated Municipal Planning Areas (MPAs). A limited portion of the Lady Slipper Resource Road (approximately 2.5 km) overlaps the Corner Brook MPA in the vicinity of the Trans-Canada Highway (TCH). Within this overlap area, land use zoning is predominantly Residential (R), with a small portion designated Light Industrial (LI) near the highway corridor. Based on the current level of design, wind farm activities within this overlap are expected to be limited to the use and potential upgrading of an existing resource road corridor. No permanent wind energy infrastructure (e.g., WTGs, substations) is proposed within municipal boundaries.

The proposed transmission line also traverses George's Lake Cottage Planning Area, Reid Lot Cottage Development Freeze Area, and the Stag Lake Crown Lake Reserve. Consultation with Land Management Division - Planning Section has confirmed that transmission lines are permitted use within these planning areas, and no concerns with the proposed transmission line have been identified.

At this stage, no land use conflicts have been identified that would require amendments to the applicable Municipal Plan or Development Regulations; however, this will be confirmed through ongoing engagement with the City of Corner Brook during detailed design. Should wind farm components be determined to conflict with permitted uses within municipal zoning, CBPPL will engage with the relevant Town Council(s) to seek the appropriate approvals or amendments, as required. Where activities occur within municipal jurisdiction, CBPPL will obtain necessary municipal development permits prior to construction, in accordance with applicable regulations.

2 Project Description

2.1 Location

The Project is in western Newfoundland, with locations of each key component shown in Figure 1.1.

Forestry modernization will occur in Forest Management Areas within CBPPL timber limits. These timber limits span from the Codroy Valley on the southwest corner of the Island of Newfoundland, to Cat Arm on the Northern Peninsula, and east to Gambo in central Newfoundland (Figure 2.1), and are contained within provincial Forest Management District's 5, 6, 9, 10, 14, 15, and 16. The Mill Site upgrades will be within the existing Mill Site, including woodroom, boiler plant, process buildings, tank farm areas, and yard facilities. Hydro power upgrades will occur at both the DLP Station located in the Town of Deer Lake and Watson's Brook Station in Corner Brook, with proposed work to occur within the existing footprints.

The Wind Farm Site is located approximately 26 kilometres (km) south of the city of Corner Brook, within the Long-Range Mountains of western Newfoundland. The location features hilly terrain, with elevated areas well-suited for WTG placement, ranging from 440 metres (m) to 625 m above sea level (asl). The approximate center of the Wind Farm Site (Figure 1.1) is located at 48.724° N, 57.950° W (WGS84). This industrial forest has well established access for construction on existing resource access roads previously constructed in support of commercial tree harvesting operations. The Wind Farm Site is located within Forestry Management District 15, Zone 6, within CBPPL timber limits. Lands surrounding CBPPL holdings are Provincial Crown lands, held in reserve for wind development, as well as the Little Grand Lake Provisional Ecological Reserve which is south of where the Project will be developed.

Project Tuckamore Environmental Assessment Registration
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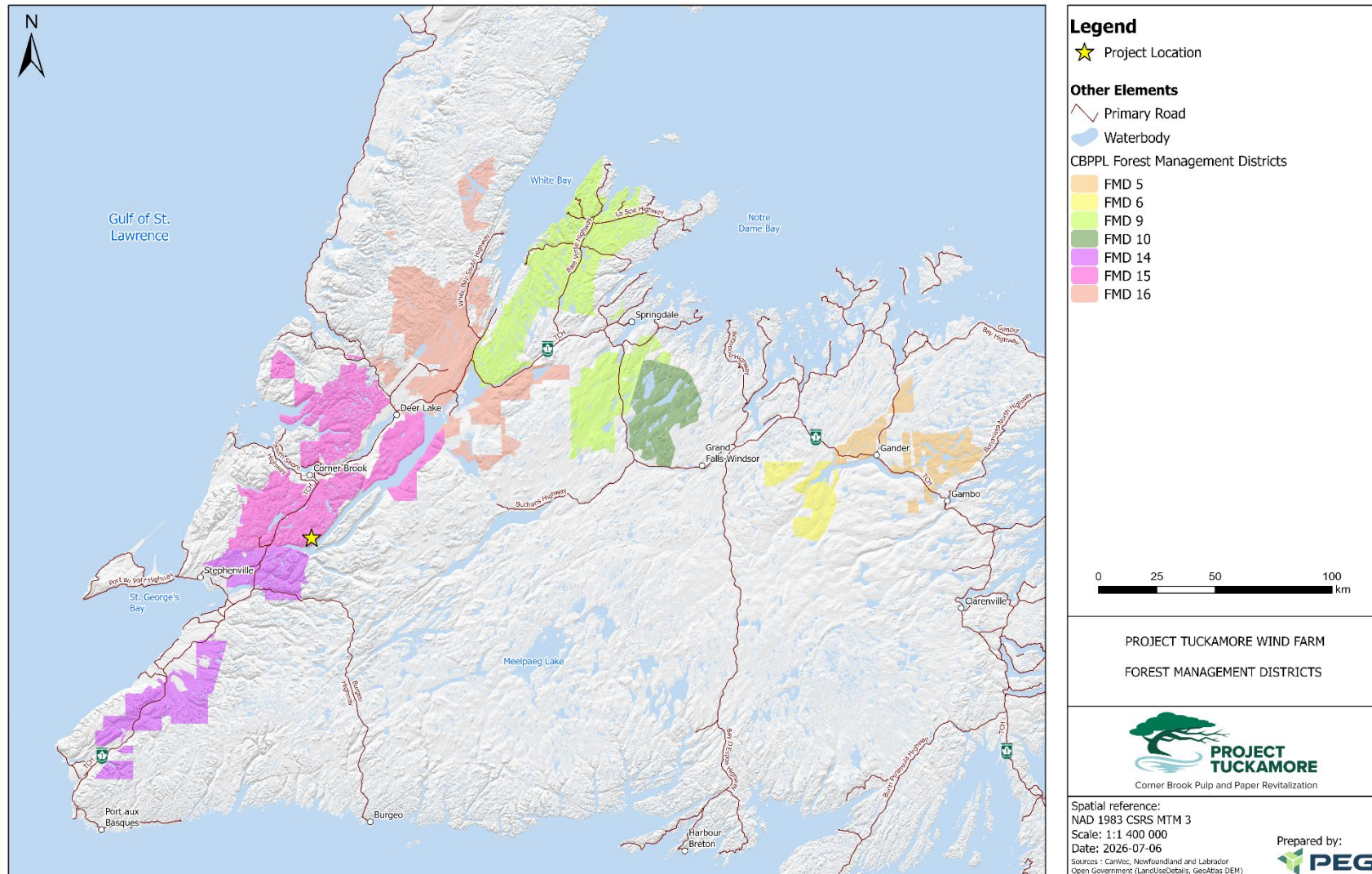


Figure 2.1 CBPPL Defined Forest Area

2.2 Project Schedule

The overall Project schedule is shown in Figure 2.2. Subject to the completion of engineering design, regulatory approvals, and other applicable authorizations, wind farm construction is anticipated as early as Q3 2027. Following construction, commissioning activities would be undertaken, with the Project expected to achieve commercial operation in 2030, pending the successful completion of required approvals and works. A detailed Project schedule will be finalized during the engineering design and execution planning process.

At this time, the Project intends to fulfil its operational life of approximately 30 years, without future extensions or modifications. Prior to the end of the operational period, decommissioning and site reclamation plans would begin, or CBPPL may consult with regulators to extend the life of the Project.

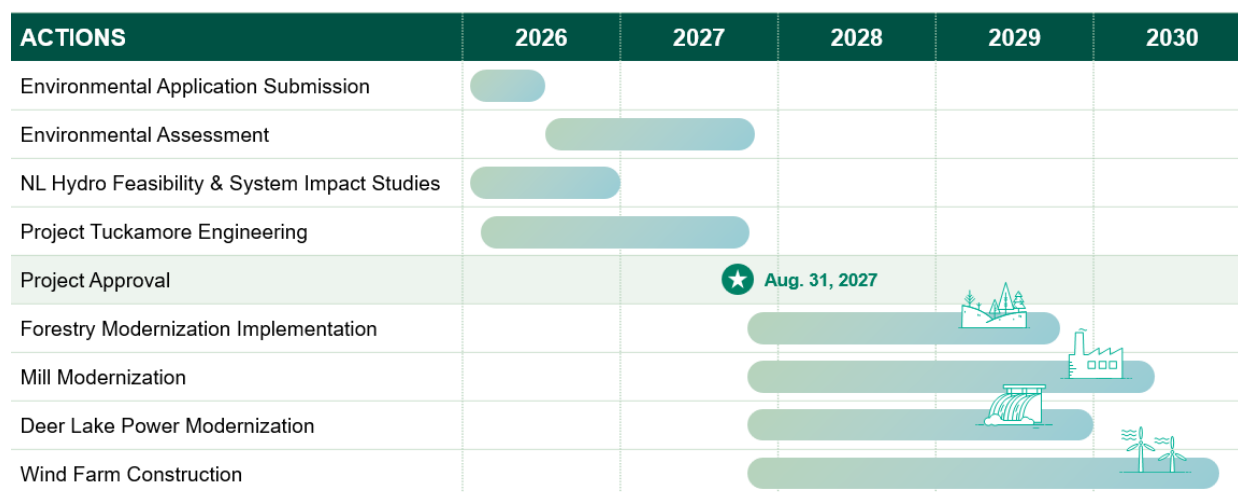


Figure 2.2 Project Schedule

2.3 Project Components and Activities

As noted above, there are four key components to the Project which are described below and shown in Figure 2.3. Each of these components are necessary for the overall revitalization of CBPPL's operations in western Newfoundland and contributes to its viability. Moreover, as CBPPL has been operating for many years, on-going components that are part of the Project are subject to established permitting and approval processes, which facilitates compliance with applicable regulations. Details on forestry modernization, the Mill Site and hydro generation and the proposed modifications are presented in Appendices A-C. Those Appendices provide a more comprehensive overview of each component and their respective connections to permitting and approval frameworks.

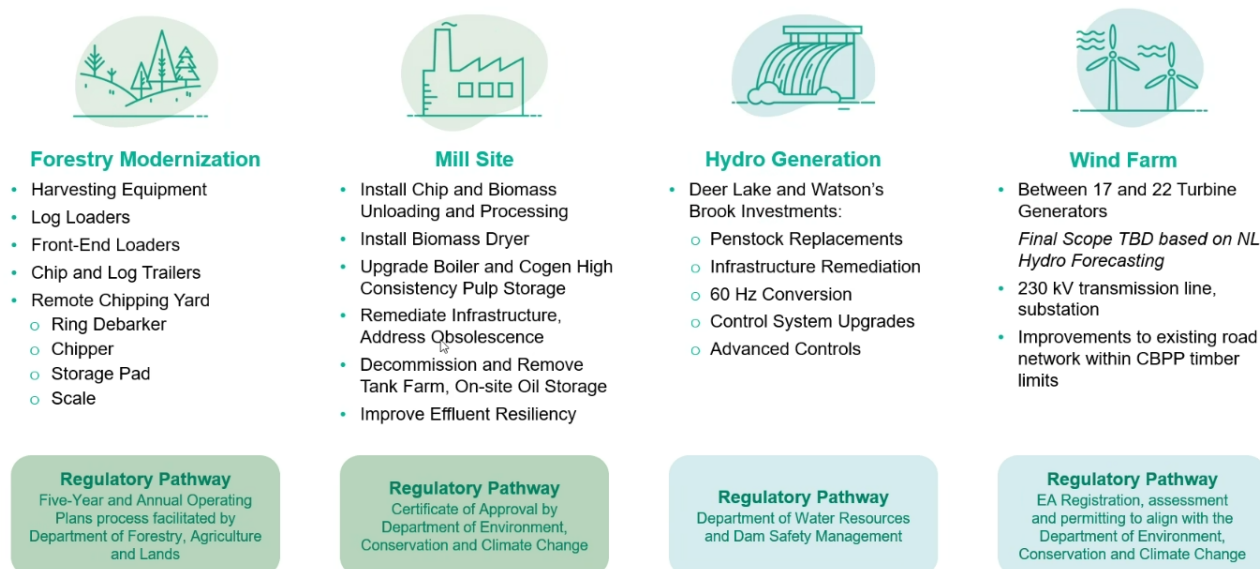


Figure 2.3 Project Components

Given the established regulatory processes for forestry operations, Mill Site, and hydro power sites, Section 2.3 of this Environmental Registration provides a description of the components and activities associated with the wind farm.

The Wind Farm Site is within CBPPL timber lease agreement. The forest in this area has been harvested for nearly 100 years. As such, the purpose of the Wind Farm Site will change from an active industrial forest to an industrial renewable energy supply.

The components of the wind farm presented in (Figure 2.4) and described in the subsections below, include:

- Up to 22 x 7-MW WTGs
- A new onsite 34.5/230 kV substation
- 34.5 kV overhead and/or underground distribution collector system within the Wind Farm Site
- 230 kV overhead transmission line connecting the wind farm to the existing substation at Massey Drive
- New roads and upgrades to existing access roads
- Cleared areas at each WTG site for equipment laydown and erection works
- Crane pads and foundations

The preliminary wind farm layout is provided in Figure 2.4 and shows a planning layout of 22 x WTGs (see Section 2.3.4 for more information on the representative WTG used in this document). However, this layout and the final number of WTGs will be refined through detailed design which includes WTG model selection. For the purpose of the Environmental Registration, a maximum height of 199.5 m was selected (Section 3.3.4), however the final model and number of WTGs may change to achieve the required installed capacity of up to 155 MW. The final layout and number of WTGs needed to meet the required installed capacity will be reviewed with regulators and the public throughout CBPPL's design process. WTGs will be sited in accordance with industry best practices and informed by noise and shadow flicker assessments, with a current design target of 1,000 m from human receptors.

Project Tuckamore Environmental Assessment Registration
Section 2 Project Description
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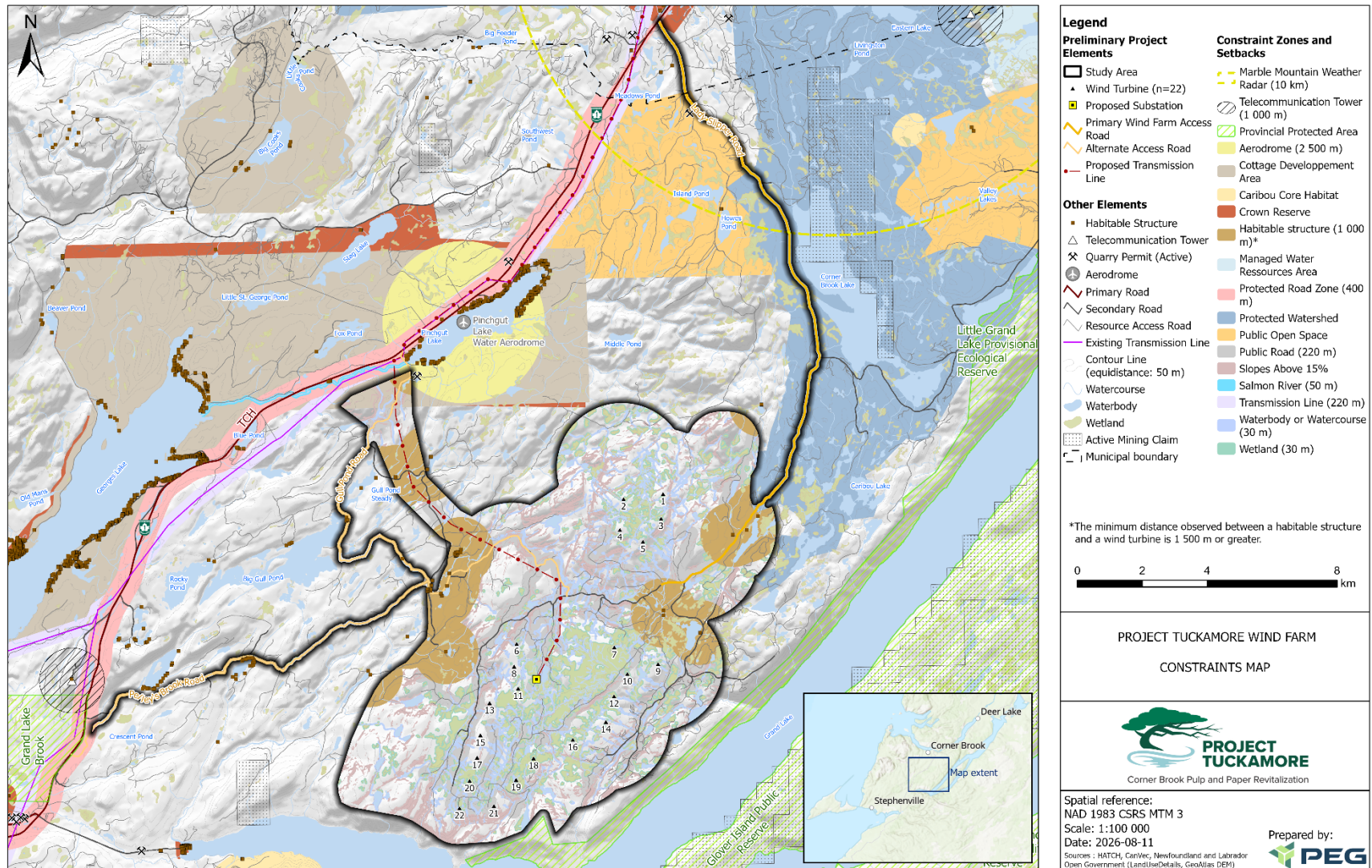


Figure 2.4 Preliminary Wind Farm Site Layout

For planning purposes, the Wind Farm study area (Figure 2.4) encompasses what will become the final footprint which will be determined during detailed design. A buffer on the wind farm components has been established to allow for adjustments in final placements due to potential site-specific constraints (e.g., rare plants and other technical and biological constraints). This buffer includes 25 m along primary access roads (from center line), 500 m along the transmission line (from center line), and 250 m around WTG pads and ancillary facilities (Table 2.1). This buffer establishes ‘corridors’ where detailed design will take place along linear aspects of the wind farm. For example, road design and upgrades will take place within a 50 m wide corridor (i.e., 25 m buffer from centre line), however the final footprint should, for the most part, be smaller than this area. Final design will be established during detailed engineering planned between Q3 2026-Q4 2027. Deviations or extensions from the buffer will be communicated to NLDECCC for review and required to receive approval prior to construction.

Table 2.1 Approximate Study Area of the Wind Farm Site

Component	Length (km)	Corridor Width (m)	Buffer Area (ha)
230 kV Transmission Corridor	30.2	500	1,544
Wind Farm Site Access (Lady Slipper Road requires upgrades)	25.2	50	126.4
Existing Roads to be Upgraded for WTG	14.3	50	70.7
WTG Access Roads - New	17.2	50	86.4
Estimated Additional New WTG Access Roads	9.9	50	49.4
Electric Lines / 34.5 kV Collector System (total km)	31.5	50	148.3
Estimated Additional Collector Line	18.0	50	84.7
WTG Pads (100 m x 80 m)	-	-	17.6
WTG Pads 250 m Buffer	-	-	647.5
Proposed Substation	-	-	4
Proposed Substation 250 m Buffer	-	-	43.6

2.3.1 Wind Farm Construction, Logistics, and Site Access

The total construction period including site preparation, construction, and commissioning of the wind farm is estimated to take approximately three years, with works beginning as early as 2027, pending receipt of applicable regulatory approvals and permits. The wind farm’s construction activities will take place in two stages:

1. Stage 1 – Clearing and grubbing, civil works, foundation works, and the beginning of electrical installation
2. Stage 2 – Electrical installation completion and WTG delivery and erection, testing, and commissioning

The equipment and construction procedures that will be used to construct the major features of the wind farm include:

1. Site Preparation (Clearing & Grubbing)

Objective: Prepare a cleared, stable and accessible construction area.

Activities:

- Clearing vegetation (trees, brush)
- Removal of roots and organic material
- Topsoil stripping and grading

Typical equipment:

- Bulldozers (clearing, pushing debris)
- Excavators (root removal, grubbing)
- Dump trucks (material hauling)

2. Access Roads and Crane Pads

Objective: Enable transport of WTG components and heavy lifting operations.

Activities:

- Construction/upgrading of existing access roads
- Construction of laydown areas
- Building crane pads at each WTG location

Typical equipment:

- Graders and compactors
- Haul trucks
- Excavators
- Graders (surface leveling)
- Rollers (compaction)
- Rock trucks / crushers
- Water trucks
- Fuel trucks

3. Foundations

Objective: Provide structural support for WTGs and infrastructure.

Activities:

- Excavation for WTG foundations
- Installation of rebar cages and anchor bolts
- Concrete pouring (large circular foundations)
- Drainage and site grading

Typical equipment:

- Excavators and backhoes
- Concrete batching plant and mixers
- Pumps and vibrators
- Surveying equipment

4. Electrical Infrastructure

Objective: Connect WTGs and transport power to the grid.

Activities:

- Trenching or pole and anchor installation
- Installation of underground or overhead megavolt (MV) cables
- Substation construction (transformers, switchgear)
- Grid interconnection line

Typical equipment:

- Excavators
- Cable pulling equipment
- Cranes (for transformers)
- Electrical testing equipment

5. Component Transport and Logistics

Objective: Deliver large WTG components to site safely.

Activities:

- Transport of WTG components
- Route management

Typical equipment:

- Multi-axle heavy haul trucks
- Specialized extendable trailers
- Escort vehicles

6. WTG Erection

Objective: Assemble WTGs on-site.

Activities (typical sequence):

- Tower section installation
- Nacelle installation
- Rotor assembly (hub + blades)

Typical equipment:

- Crawler cranes / lattice boom cranes (main lifts)
- Secondary cranes (assist lifts)
- Lifting tools (slings, spreader bars, torque tools)

7. Electrical Hook-up and Commissioning

Objective: Make WTGs operational and connected.

Activities:

- Internal WTG wiring
- Supervisory control and data acquisition (SCADA) and control systems setup
- Grid synchronization
- Commissioning and testing

Typical equipment:

- Electrical testing systems
- Control and communication systems
- Commissioning tools

2.3.1.1 Construction Logistics

For the most part, components and equipment for the wind farm will arrive at the existing port in Corner Brook and will be transported to the site by truck. For the purpose of early logistics planning, it is assumed that up to four to six marine vessels will be required to deliver the WTG components, with five vessel calls as the working assumption. If blades, towers, and nacelles originate from different factories or regions, the number of vessels could increase.

Based on the selected Nordex N163/6.X unit (Section 2.3.4) with a 118 m hub height, each WTG is comprised of approximately 11 major transport components, including three blades, five steel tower sections, one nacelle, one drive train, and one hub. Nordex's transport guidance indicates that each blade and each steel tower section is transported individually on a dedicated trailer, with nacelle, drive train, and hub also transported as individual discrete heavy-haul loads.

For planning purposes, this equates to approximately 275 loaded trucks of WTGs components and associated construction materials. This estimate is for WTG components only and does not include transportation of cranes, foundations, rebar, concrete, substation gear, electrical transmission components, or general Project traffic. Transportation of Project components will follow NL's Policy for

Highway Management to effectively and safely move Project-related equipment. CBPPL is undertaking a preliminary desktop transportation feasibility analysis for oversized WTG components. This analysis includes identifying viable transport routes and strategies, with a focus on use and potential upgrades to existing infrastructure (i.e., roads, bridges, culverts). This includes developing preferred transport configurations for major components, identifying potential staging areas, assessing logistical constraints, and evaluating challenging movements using AutoTURN simulations. The study will support early design decisions by highlighting feasibility, risks, and mitigation options. Once a preliminary route has been identified, CBPPL will consult with NLDTI to verify engineering and load requirements. As detailed in Section 3.2, CBPPL will undertake a Traffic Impact Study and Traffic Management Plan in consultation with NLDTI.

Review of port logistics is underway given with an estimated five vessel calls. The wind farm development would involve handling and staging more than 240 major WTG components. CBPPL will coordinate with the port to communicate port requirements and to develop a Logistics Plan for the activities at the port related to the wind farm.

Transportation of the WTGs and other components will primarily use existing public roads and the proposed wind farm access roads. Although the overland haul distance from the Port of Corner Brook to the Wind Farm Site is relatively short, route geometry and physical constraints are primary logistics considerations. Nordex transportation requirements generally specify a minimum usable road width of approximately 4 m, obstacle-free clearance of approximately 10%, and recommends avoiding inner curve radii less than 30 m, particularly for blade transporters. Selected routes will be confirmed prior to shipment, and applicable permits and approvals will be obtained from NLDTI prior to material movement, including Overweight and Over Dimensional Special Permits, as required. Additional information on site access is provided in Section 2.3.2.

At the Wind Farm Site, the assembly and construction footprint is currently based on the Nordex N163/6.X layout guidance as a representative WTG configuration. Additional details are provided in the manufacturer data sheet in Appendix D.

It is noted that certain tower transport parameters for the WTG, including exact section weights, axle configurations, and permitting requirements, are identified as preliminary or to-be-confirmed in vendor documentation. Final haul assumptions will be confirmed with the WTG supplier during detailed engineering and logistics planning and discussed with NLDTI and the City of Corner Brook. CBPPL has initiated a Transportation Logistics Study to better understand, and plan, transportation requirements.

Where practical along certain transportation routes, localized, and temporary, modifications may be required to accommodate the transport of WTG components. Such modifications will be undertaken in consultation with a specialized heavy-haul contractor, NLDTI, City of Corner Brook, and the WTG manufacturer.

The specific routing from public roads to the individual WTG locations within the Wind Farm Site will be finalized following the completion of detailed engineering. Moreover, the logistics associated with the transportation of construction, civil works, and electrical works equipment will be finalized during the detailed design and execution planning stages.

2.3.2 Access and Site Roads

Access from the Port of Corner Brook to the wind farm is proposed to follow provincial highways including Route 450 A (the Lewin Parkway) and the Route 1 (Trans-Canada Highway - TCH). Beyond these routes, the wind farm will require upgrading existing roads, as well as the creation of new access roads to support the construction and maintenance of the WTGs. The site will be accessed using the existing Lady Slipper Road (Figure 2.5), which traverses through the municipal planning area for Corner Brook, as well as skirts the Protected Water Supply Area adjacent to Corner Brook Lake. Lady Slipper Road is an established road and requires limited civil infrastructure upgrades. As discussed in Section 2.5.2, there are two alternate site access roads including Gull Pond Road and Pelley's Brook Road.

As noted above, a 50-m corridor along each route has been selected to allow for future design variations or upgrade modifications needed to support WTG delivery. WTG transport documentation generally requires a minimum usable road width of approximately 4 m along straight aways, with obstacle-free clearance of approximately 10%, and recommends avoiding inner curve radii less than 30 m, particularly for blade transporters. If modifications to the selected access route are required to meet these criteria, they would occur, for the most part, within the assumed 50 m buffer.

The wind farm will also require the construction of on-site or WTG roads to provide access to individual WTG locations. WTG roads are anticipated to be located primarily along hilltops and will include the construction of new roads, as well as the upgrade and extension of existing forestry roads. The final alignment, extent and design of WTG roads will be developed and confirmed following the completion of detailed engineering design and final site layout. Required maintenance activities and schedules for watercourse crossing infrastructure and access roads for transmission and collector lines will be developed and implemented throughout the life of the Project.

The construction of these access roads includes, but is not limited to, civil works such as clearing and grubbing, excavation, and drainage (ditches and culverts). Moreover, the cross slopes, profile grade and turning radius will be constructed as per the WTG's manufacturer specifications. As per best practice standards and guidelines, removed topsoil will be appropriately stored and used at a later date for post-construction restoration of temporary facilities.

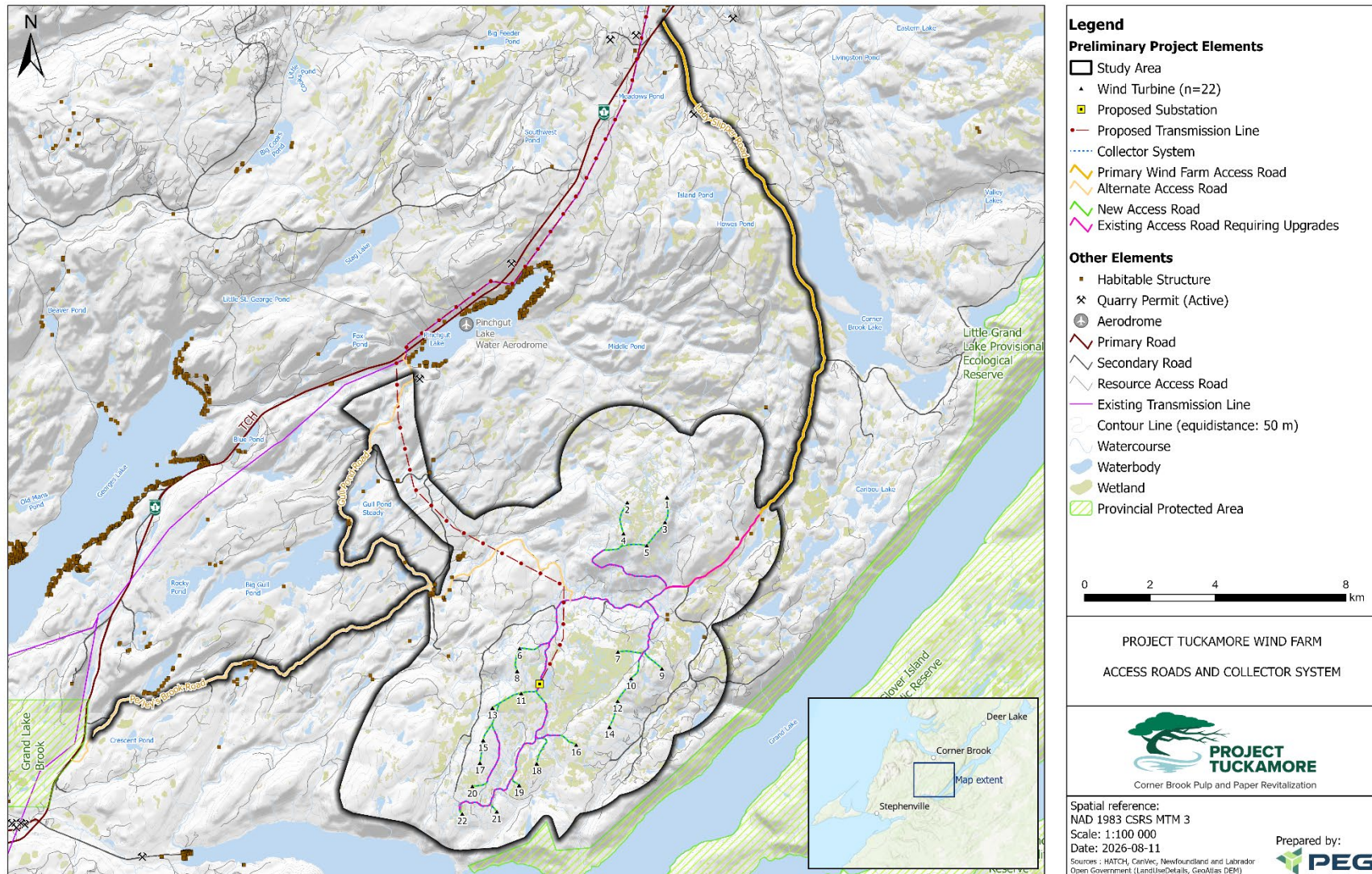


Figure 2.5 Proposed Access Roads and Road Upgrades

Construction of the wind farm will require the use of aggregate materials (e.g., rock, sand, and gravel) for the development of access roads, WTG foundations, crane pads, laydown areas, and associated infrastructure. It is anticipated that fill materials required for construction and upgrading of the access road and WTG roads will be sourced from the Wind Farm Site to the extent possible. Engineering will be completed to balance cut and fill quantities as much as possible. However, should additional material be required, initial plans are for it to be sourced from either an on-site quarry or a local supplier. Should on-quarry development be required, candidate locations will consider areas that have been previously disturbed, maintain blasting setbacks, are located outside of identified sensitive environmental features (such as wetlands, watercourses, and known occurrences of SAR), and accessible using existing or planned Project infrastructure to limit additional disturbance. A geotechnical study is underway to refine Project construction requirements, including aggregate quantity estimates, material balance assessments, and potential supply sources. This work will be used to confirm aggregate requirements, identify material deficits or surpluses, evaluate potential quarry development or sourcing options, and inform material management strategies. Additional information regarding aggregate requirements and sourcing will be provided as Project planning and design advance. Activities associated with quarry development may include:

- Vegetation clearing and grubbing
- Topsoil stripping and storage
- Drilling and blasting of bedrock, where required
- Crushing and screening of material
- Temporary stockpiling
- Haulage of materials to construction areas

In the event an on-site quarry is required, CBPPL will follow applicable guidelines for borrow pits and quarries, and CBPPL will obtain the necessary approvals, including a valid quarry permit from the Mineral Lands Division of NLDEM, prior to aggregate extraction in accordance with the *Quarry Materials Act*. CBPPL has established management measures in their Five-Year Forestry Operating Plan (2024–2028; Kruger Industrial 2024) which will be implemented for this Project. CBPPL will consider environmental settings and regulatory requirements in the siting and operation of the proposed quarry. The siting process will specifically avoid habitats supporting species at risk (SAR) and species of conservation concern (SOCC), as well as waterbodies and wetlands. The Environmental Protection Plan (EPP Section 4.2) will include management measures for overburden removal, drilling and blasting areas, crushing/screening equipment, stockpile locations, and erosion and sediment control.

Aggregate sourcing strategies will be refined during detailed design to reduce new disturbance. CBPPL will confirm final quarry locations (if required) through pre-construction environmental review and field verification. Permits and approvals will be obtained prior to quarry development, and mitigation measures may be refined in response to monitoring results, regulatory input, or unforeseen site conditions.

Access roads, including access routing options, as well as WTG access roads for the Wind Farm Site are presented in Figure 2.5.

2.3.3 Site Preparation

Although the Wind Farm Site is in an area that has been subject to timber harvesting, there will remain a need for additional clearing. The pre-construction site preparation activities include tree harvesting, clearing, and grubbing, as well as general land leveling with mechanical equipment.

Merchantable timber will be bucked, limbed, stacked and will be placed in designated areas for pick-up. Where required (e.g., foundation locations, new WTG roads), topsoil will be removed and stored in a designated location near its source and for use in restoration of temporary construction areas. When storing topsoil, efforts will be made to reduce compaction to the extent possible.

Harvesting, clearing, and grubbing activities will be performed outside of the migratory breeding bird season (mid-April through mid-August) to the greatest extent possible.

2.3.4 Wind Turbine Generators

WTGs and their supporting infrastructure typically consist of:

- Concrete foundation
- Steel tower sections with service access for maintenance
- Nacelle, which houses the rotor shaft, gearbox and generator
- Three rotor blades
- Rotor hub
- Electrical transformer
- Electrical and grounding wires and buried grounding grid around the perimeter of the foundation

Once the WTG components are delivered to their respective WTG pads, the tower sections are erected in sequence on the foundations. Next, the nacelle and its associated pieces with the rotor blades are installed.

The representative WTG model for the Project is the Nordex N163/6.X (TS118 model). The wind farm is anticipating up to 22 WTGs, each rated at 7 MW, 7,778 kilovolt-amperes (kVA) and 950 volts (V). Additional technical characteristics for the representative WTG model are presented below in Table 2.2, and the manufacturer datasheet is provided in Appendix D.

Table 2.2 Technical Characteristics of the Nordex N163/ 6.X (TS118 Model)

Characteristic	Measurement & Unit
Hub Height	118 m
Rotor Diameter	163 m
Total Height	199.5 m
Cut-In Wind Speed	3 m/s
Cut-Out Wind Speed	26 m/s
Operating temperature	-40 °C to +50 °C
Swept Area	20,867 m ²
Tower Material	Tubular Steel Tower
Design Service Life	≥25 years

Notes:

m = metre(s) m/s = metre(s) per second; °C = degrees Celsius; m² = square metre(s)

As noted in Table 2.2, the representative WTG model has a hub height of 118 m, and a swept diameter of 163 m, with a maximum WTG height of approximately 200 m.

The WTG will operate at variable speeds, depending on local wind conditions. The nacelle is an enclosure which houses the main rotor shaft and generator. It is located at the top of the tower and is connected to the three rotors by the main shaft and hub. The representative WTG model, and the final model selected, will most likely be equipped with blade de-icing systems to improve operations and reduce the potential for ice build-up / ice throw.

Crawler cranes will be considered for the erection of WTGs. Crane mobilization and assembly at each WTG site will be required, including partial crane 'teardown' to transport crane components between different pad sites. The crane pads will be adjusted as required for ground stability and safe operations during the construction phase.

As detailed in Section 2.3.10.3, WTG lighting will meet the requirements for lights under the *Canadian Aviation Regulations*. Transport Canada commonly recommends medium intensity flashing red beacon lighting atop WTGs. During construction activities, the use of mobile flood light units will be limited to the extent possible and will be shut off when not needed. Full cut-off luminaries (i.e., lights with shades angling light downwards) will be used where practical to reduce glare, light trespass, and skyglow while maintaining safety for staff.

2.3.5 Crane Pads and Foundations

Steel reinforced concrete foundations and gravel pads will be the base for equipment and infrastructure. The WTG pad typically encompasses both the crane pad and the hardstands where the latter refers to an area where WTG components, WTG equipment, transport equipment, and storage equipment can be stored. The purpose of crane pads is to safely accommodate the weight of the crane required for WTG installation and maintenance. For this wind farm, the WTG / crane pads will be approximately 100 x 80 m in size. These pads will be constructed in the "High and Dry", away from watercourses and wetlands, with appropriate erosion and sedimentation control installed around each individual pad.

Installation of WTG and associated infrastructure foundations for the wind farm will require the production of concrete in sufficient quantities to meet construction demands. CBPPL is currently evaluating two potential approaches: a fixed concrete plant (owned and operated by a third party) with trucking of concrete to the site, and an on-site batch plant. The evaluation process to identify the preferred option is currently ongoing. The option to use a fixed plant will be evaluated on cost and capability to bring material to site in time to prevent premature curing. Alternatively, a temporary mobile batch plant may be established within the Wind Farm Site to support construction activities. A mobile batch plant is a portable facility in which aggregate, cement, water, and admixtures are combined to produce concrete on-site, and is typically removed following completion of construction activities. If this option is selected, the plant would be sited based on considerations such as proximity to WTG foundation locations to reduce haul distances, use of existing access infrastructure, and avoidance of environmentally sensitive features (e.g., wetlands, watercourses, and known habitat constraints) to the extent practicable.

An on-site batch plant would require a water source nearby and allow for the delivery of aggregate and cement in a cost-efficient manner. Should a batch plant be used, water use and wash water management during batch plant operation would be conducted in accordance with the Environmental Code of Practice for Concrete Batch Plant and Rock Washing Operations (Government of Newfoundland and Labrador, Department of Environment and Lands 1992). Standard practice is that wash water is maintained in a closed system rinsing / settling basin prior to discharge which is cleaned as required to maintain retention capacity. Prior to release, wash water would be tested for parameters related to concrete and additives, pH, and total suspended solids, and parameters specified in the provincial *Environmental Control Water and Sewage Regulations* and parameters related to fish habitat protection required in the federal *Fisheries Act*. If the wash water does not meet discharge requirements, it would be further treated until the criteria are met. It is estimated that approximately 800 m³ of concrete will be required per WTG foundation. This volume is preliminary and exact volumes will be determined once detailed engineering is completed.

Additional work required to support this evaluation includes confirmation of plant location, characterization of water use requirements (volume, source), identification and quantification of potential effluent streams, and development of site-specific mitigation measures for dust, runoff, and material handling. Should a batch plant be required, CBPPL will develop a Concrete Batch Plant Management Plan which will describe the location and operation of the batch plant, water supply, and water intake. The plan will also include a description of water management measures, noise mitigation, and dust control.

The base diameter of the concrete WTG foundations will differ depending on the type of foundation that is selected. Several preliminary foundation designs are being considered for this wind farm, including the rock anchor foundation, the typical shallow concrete foundation with no ground water, and the combined concrete foundation for tower crane and WTG with no ground water, as illustrated in Figure 2.6, Figure 2.7, and Figure 2.8 respectively. The depth of excavation may vary between 2 m and 3.5 m, depending on geotechnical conditions. A detailed geotechnical investigation is being conducted in 2026 and will continue in 2027 to support final design and location of foundations which will be reviewed and approved by a registered Engineer recognized by the Association of Professional Engineers and Geoscientists of Newfoundland and Labrador.

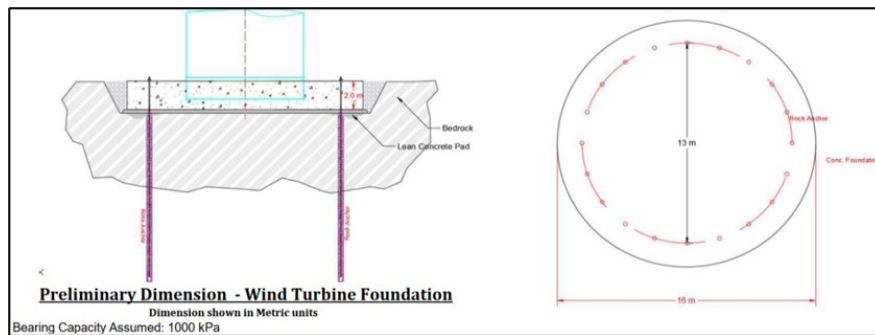


Figure 2.6 Rock Anchor Foundation Schematic

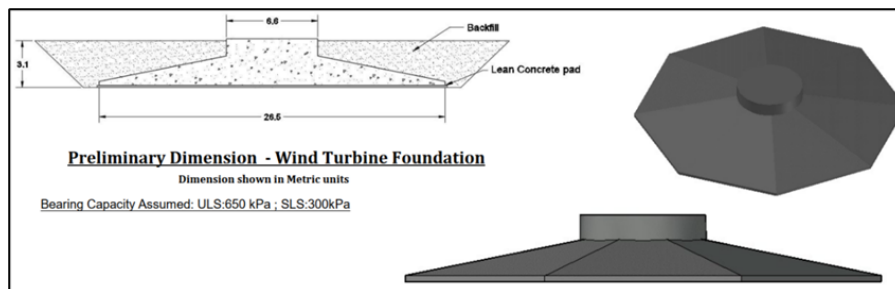


Figure 2.7 Typical Shallow Concrete Foundation with no Ground Water Schematic

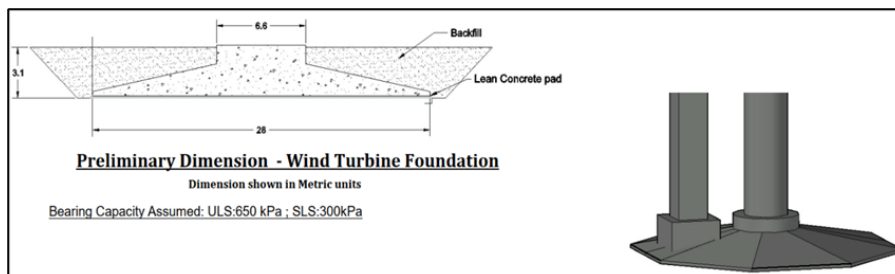


Figure 2.8 Combined Concrete Foundation for Tower Crane and WTG with no Ground Water Schematic

2.3.6 Electrical Infrastructure

Electrical infrastructure includes grounding infrastructure, the medium voltage collector system, the Project substation, and the transmission line which will interconnect to the existing grid.

2.3.6.1 WTG Electrical Infrastructure

Electrical infrastructure associated with each WTG includes a transformer, grounding system, and electrical connection to the collector system.

Ground infrastructure for a WTG is designed to safely dissipate lightning strikes and electrical faults, protecting equipment and staff. A typical grounding method for WTGs is comprised of grounding rods that are bounded to a grounding ring which in turn is bonded to a foundation reinforcement. Grounding will also be installed at other areas as determined by the final design of the wind farm.

The site-wide collector system that will connect the WTGs to the on-site substation is planned to be routed underground (34.5 kV). Connections between individual WTGs and the site-wide collector system (34.5 kV) are also planned to be routed underground. Therefore, trenches are required for the safe burial of the underground cables. Safety procedures such as marking the full of the trench with permanent warning signs to advise of potential hazards of unsupervised and unauthorized excavation will also be put in place. Final trench and warning sign specifications will be designed in accordance with best engineering and safety standards.

2.3.6.2 Collector System, Substation and Interconnection to Grid

The wind farm collector system will consist of an extensive 34.5 kV transmission network that connects the WTGs to the substation. The wind farm collector system will be designed such that throughout the site, multiple WTGs in proximity will be connected together to the substation via an overhead or underground circuit. The structure type to be used for the overhead collector network is the wooden utility pole and will most likely run adjacent to access roads that have been upgraded to facilitate construction. Standardly, the poles stand at 10 m tall (excluding standard 2 m buried into the ground) and are chemically treated to preserve structural integrity, protect their appearance, and extend their lifespan by fending off pests and the elements.

A substation will be required at the Wind Farm Site to serve as the point of interconnection from the medium voltage collector system and step up the voltage for the 230 kV transmission line (Section 2.3.6.4).

The main power transformers at the Project substation will be 230/34.5 kV autotransformers with a 13.8 kV DELTA tertiary to provide station service supply. Currently, the main power transformer has a chosen size of 75/100/125 megavolt-amperes (MVA) that is suitable for a capacity of 155 MW.

2.3.6.3 Transmission Line

A 230 kV transmission line will connect the Wind Farm Site with the existing terminal station near Corner Brook. The transmission line includes a 500 m right-of-way (RoW) and extends a total of 30.2 km in length, encompassing a total area of roughly 5.5 square kilometres (km²). A total of 10.7 km of this length will be 'greenfield', connecting from the south end of Pinchgut Lake to the wind farm substation itself.

Approximately 17 km of the transmission corridor will run parallel to an existing 230 kV transmission line owned and operated by NL Hydro (TL211), from near Pinchgut Lake along the TCH, Northeast back toward the City of Corner Brook where it will tie into the Massey Drive Terminal Station (MDTS).

Transmission line routing, as well as other electrical infrastructure are presented in Figure 2.9.

Structures for the 230 kV transmission line will likely be lattice steel towers (guyed and self-supporting) similar to existing standard 230 kV steel towers of transmission lines TL 266 and TL 267 operated by NL Hydro. Representative structure types and applicable insulator assembly relative to line angle are as shown in Table 2.3 and Figures 2.10 and 2.11. During detailed engineering design, a wooden pole configuration will also be evaluated.

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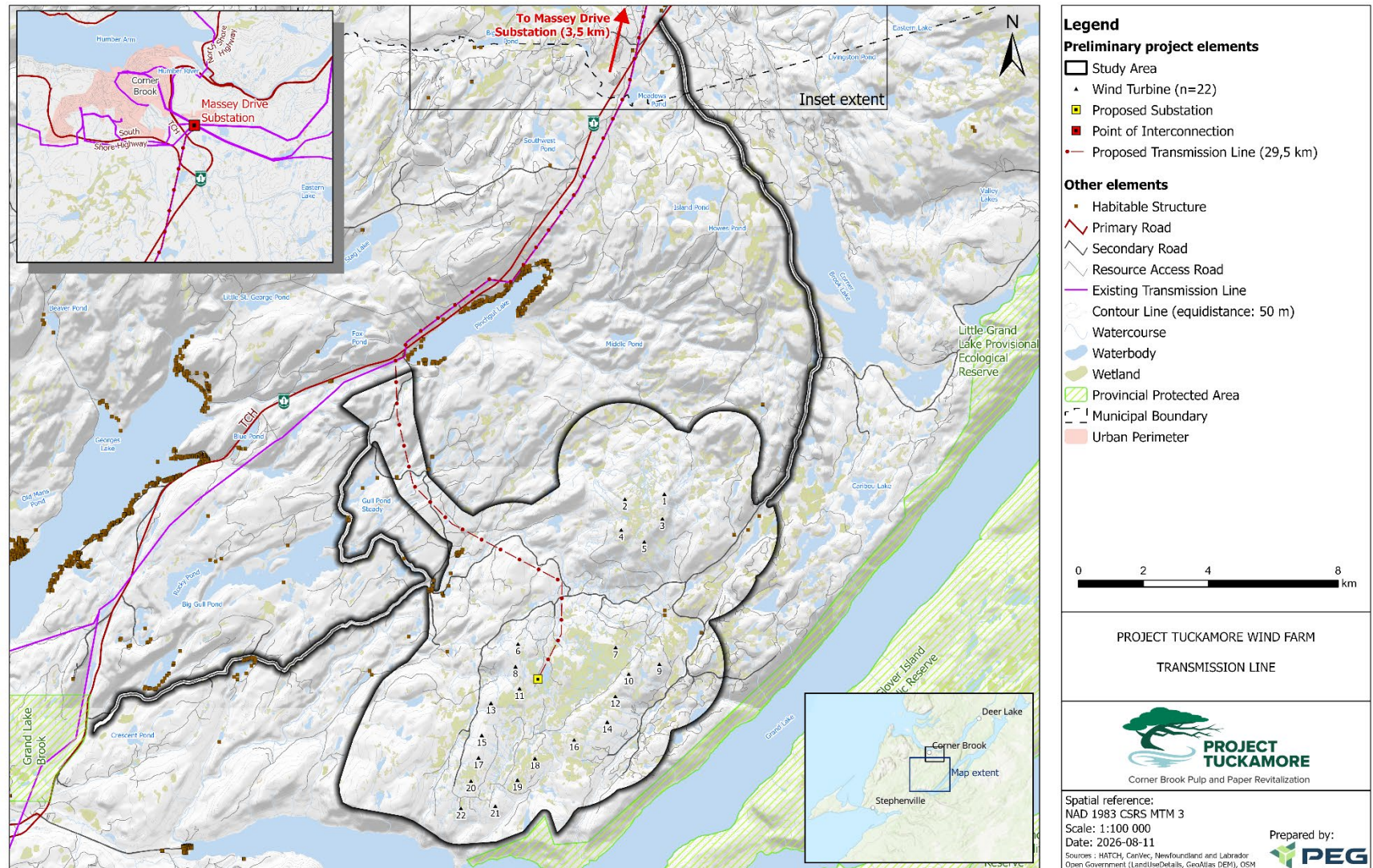


Figure 2.9 Substation, Collector System, and Transmission Line Corridor

Table 2.3 Transmission Line Lattice Tower Types

Line Angle	230 kV Lattice Tower	Insulator Assembly Type
0° up to 1°	Type A: tangent guyed tower	Suspension insulator assemblies
Above 1° & up to 6°	Type B: low angle guyed tower	
0° & up to 30°	Type C: dead-end self-supporting tower	Tension assembly (for dead-end application). Suspension assembly (for jumper support)
Above 0° up to 45°	Type D: Dead-end Self-supporting tower	
45° to 90°	Type NDD: terminal dead-end self-supporting tower	

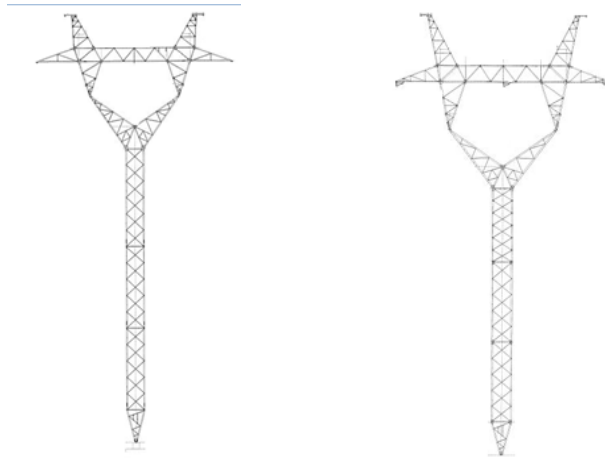


Figure 2.10 Type A Tower (Left) and Type B Tower (Right)

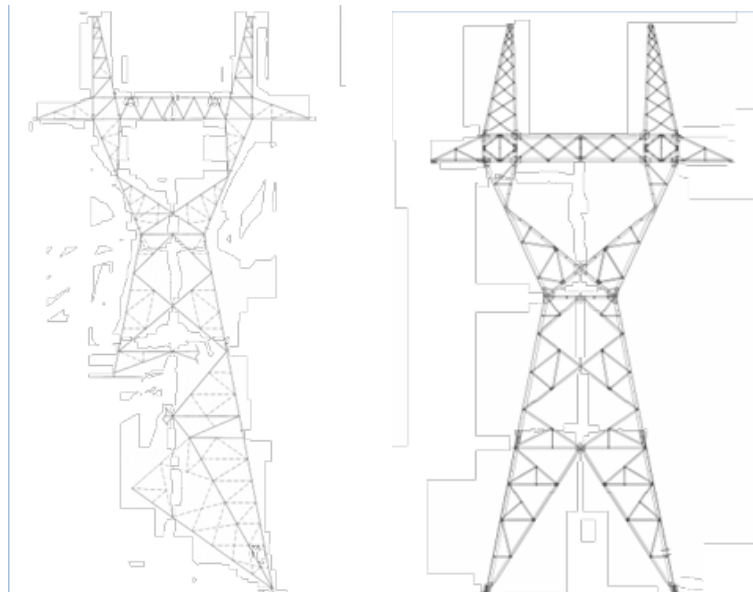


Figure 2.11 Type C and D Tower (Left) and Type NDD Tower (Right)

2.3.6.4 Terminal Station

The existing MDTs, located in the Town of Massey Drive, near Corner Brook has been chosen as the point of interconnection with the provincial electrical grid. Minimal capital expenditure is required for interconnection at this location. The MDTs has an existing 230 kV bus that can be used, with minor upgrades to extend the 230 kV bus and construct a new 230 kV circuit breaker bay for the wind farm interconnection.

2.3.7 Post-Construction Site Restoration

CBPPL is committed to restoring temporary construction sites in accordance with best management practices, and industry standards. Once construction is completed and the wind farm is in its operational phase, temporary works will be removed, and the land will be re-graded. Stored topsoil will be placed over disturbed areas, stabilized and seeded to prevent erosion and sedimentation, while promoting regeneration, respectively.

2.3.8 Operation and Maintenance Details

It is anticipated that normal operation of the wind farm will be achieved following a structured operational readiness commissioning, and ramp-up program. During this program, routine activities, processes, and operations, including pollution control or waste management program, will be defined for daily reference. Moreover, this includes the preventative maintenance, where maintenance activities will be detailed in manuals in accordance with their frequency (e.g., daily, weekly, bi-weekly, annually). With the exception of planned maintenance, unfavorable wind conditions, or other extreme weather events, WTGs will operate 24 hours per day.

2.3.8.1 Site Access and Traffic

Site access will need to be maintained throughout the operational life of the wind farm for regular maintenance and safety procedures. These activities will have near negligible impacts to traffic in the city of Corner Brook or on the highways of the region.

Heavy equipment, primarily for snow removal and clearing, will be used onsite as needed.

Signage will be present and maintained throughout the operational life of the wind farm. This will include information such as the emergency contacts for the site, relevant information about the wind farm, and the companies involved. A sign will be posted at each entrance to the site and periodically throughout the site as required for the wind farm. During operation, access to the Wind Farm Site will not be restricted by gates except at the substation facility, where controlled access measures will be implemented to maintain safety, security, and operational integrity.

2.3.8.2 Maintenance Plans

Preventative maintenance will be scheduled and performed at regular intervals throughout each operational year of the wind farm to achieve its anticipated operational life of 30 years. Maintenance activities will include, but are not limited to:

- Maintenance of blade roots of the WTGs by service technicians.
- Collector and transmission lines inspections to check for deterioration and weakened support structures.
- A definitive maintenance activities list with setpoints will be defined during the execution stage of the Project, following commissioning. In the exceptional cases where an unscheduled maintenance event calls for the replacement of WTG components (e.g., rotor blades), support cranes (tower cranes or other) will likely be used.
- Maintenance of the roads and of the transmission line right of way will occur as required.

Reactive or unscheduled maintenance is anticipated to be limited, as the presence of the SCADA system allows for 24-hour monitoring of the WTGs by the operations team of the proponent and the manufacturer, if applicable.

2.3.9 Decommissioning and Rehabilitation

The wind farm has an expected lifetime of approximately 30 years. At the end of the wind farm's operational life, the site will be decommissioned and rehabilitated. This process includes removing the WTGs including the tower, foundation pedestal to 1 m below ground level, generator, above ground cabling, and auxiliary equipment and reinstating the landscape to as close to its natural state as possible.

The phases of decommissioning and rehabilitation include the following:

- The WTGs will be dismantled and removed from the site for sale or scrap. The bases will be removed to below plough depth or covered adequately, and the topsoil will be returned so that the land may return to its former use.
- Approximately 85-90% of a WTGs total mass can be reused or recycled (CanREA n.d.). Various recycling methods will be explored during planning for the decommissioning phase, so WTG component parts without high value at end of life (e.g., blades comprised of fibers, epoxy) are disposed of in an appropriate fashion, to future industry standards.
- The WTG roads and site entrance may be removed if deemed necessary. After removal, the land will be rehabilitated.
- Underground cables will be below ploughing depth and have no threat of harmful substances. They may be recovered or remain in the ground. If left in place, terminal connections will be cut back to plough depth.
- Other infrastructure or equipment will be dismantled and removed, and the land reinstated to its former use.
- The foundation pedestal concrete will be removed to 1 m below ground, rebar cut off and the site covered with soil.

- Crane pads will be removed, if necessary.
- Re-seeding and/or replanting will occur on disturbed areas.

Decommissioning typically begins within six months of the end of a wind farm's operational life. The components of the WTG will be dismantled and removed from the site. In collaboration with regulators at the time of decommissioning, a specific Waste Management Plan (WMP) will be developed to determine appropriate recycling and disposal for the various materials removed from the site in compliance with the regulations at that time.

Similar traffic movements to the delivery of the WTG components are anticipated during decommissioning. The decommissioning phase will require less vehicle support than the construction phase.

Following the removal of equipment and infrastructure, site restoration activities such as reseeding and/or revegetation would commence. Grading and re-contouring will also be necessary to confirm that the site is restored to an agreed use or condition.

Erosion control and storm water management during site restoration will also be critical and should follow measures and best management practices as outlined in applicable standards or specifications.

CBPPL will decommission temporary watercourse crossings, including implementing a plan to rehabilitate areas where water crossing infrastructure is removed. Infrastructure left in situ will be maintained in accordance with a long-term management strategy, including a dedicated owner.

2.3.10 Emissions, Discharges, Wastes and Visual Impacts

Wind farm construction, operation, and decommissioning will produce various emissions, discharges, and waste, as described below. These include atmospheric emissions, water discharges, and solid waste generation, which must be managed carefully throughout each phase of the wind farm's lifecycle. In addition, WTGs will be clearly visible across the landscape. An assessment of visual impact and shadow flicker has been carried out to evaluate how much the units can be seen from different viewpoints (Hatch 2026b; Appendix E).

2.3.10.1 Air Quality and GHG Emissions

Releases of air contaminants, such as dust and engine exhaust, will occur during the construction phase as heavy equipment operates. Dust (including total particulate matter [TPM], particulate matter smaller than 10 microns [PM_{2.5}], and particulate matter smaller than 10 microns [PM₁₀]) is the primary air contaminant of concern for construction projects. Movements of equipment and vehicles on unpaved roads, as well as movements of soil, can cause particulate matter to be suspended in the air and travel to off-site receptors. Other air contaminants, such as nitrogen dioxide (NO₂) and carbon monoxide, are released from the combustion of fuel in equipment and vehicles.

Greenhouse gas emissions (detailed in Section 5.2.1) are primarily a product of fuel combustion, which occurs in heavy equipment and blasting during construction. Although GHG emissions do not directly affect air quality, the dispersion of GHGs contributes to increasing the concentrations of GHGs in the atmosphere and in turn contributes to global climate change. In addition to GHGs from fuel combustion, the destruction of vegetation allows for carbon that was previously stored to be released to the atmosphere, either through combustion or decomposition.

During operation, emissions of air contaminants and GHGs from wind farm operation will only occur from the use of maintenance vehicles.

2.3.10.2 Noise Emissions

Construction activities, such as earth moving, will generate noise from the use of heavy equipment as well as from the movements of the material itself. Blasting may be used during construction, which can lead to sudden loud noise. Increased truck traffic to access the site will also cause an increase in sound levels at nearby receptors. Other than the truck traffic noise, noise during the construction phase will be intermittent and temporary because construction activities occur over the entire Wind Farm Site. As the distance between the construction activities or roads and a receptor increases, less sound from Project activities will be perceived.

Once operational, the WTGs and substation will generate noise emissions, primarily originating from mechanical (produced by components such as the gearbox and generator) and aerodynamic sources (movement of WTG blades through the air) (National Renewable Energy Laboratory n.d.). This noise is often described as a whooshing or swishing sound, particularly during periods of high wind speed. The intensity and nature of WTG noise depend on blade design, rotational speed, and local environmental conditions (National Renewable Energy Laboratory n.d.). Although WTG noise is usually lower than many other environmental noise sources, it may be detectable by nearby residents, particularly in rural areas where ambient noise levels are naturally low (U.S. Department of Energy n.d.).

The Project will be designed to meet noise guidelines (45 A-weighted decibels [dBA] at nearby residences/seasonal cabins) and required setbacks will be established so WTGs are located at a sufficient distance from homes and sensitive receptors, thereby reducing exposure to operational noise. Hatch Ltd. (Hatch) was retained to conduct a noise assessment to evaluate the impact that wind farm construction and operation activities have on the nearest sensitive receptors and inform detailed siting of WTGs (Hatch 2026a, Appendix F). The assessment of sound quality during operation considered noise from the WTGs and the transformers. Noise estimates for the representative model (Nordex N163) are provided in Table 5-3 in Appendix F. The percent of highly annoyed (%HA) at each receptor during operation was estimated and compared to the %HA in the baseline condition. The change in %HA was found to be below the Health Canada limit of 6.5%³ for receptors (Hatch 2026a, Appendix F).

³ "Percent Highly Annoyed" (%HA) is a calculated measurement used by Health Canada to assess the potential effect of environmental noise, such as noise from WTG operation, on community well-being. Health Canada considers a projected %HA increase of 6.5% or greater the threshold for recommending noise mitigation measures, such as setbacks

2.3.10.3 Lighting

WTG lighting is outlined in Transport Canada's *Standard 621 – Obstruction Marking and Lighting – Canadian Aviation Regulations (CARs) in Chapter 12: Marking and Lighting of Wind Turbines and Wind Farms (2021)*.

For WTGs, such as the Nordex N163/6.X, there are day marking requirements. For WTGs with a solid silhouette, the rotor blades, nacelle and upper 2/3 of the supporting mast are painted an aviation white or an off-white colour. White colours have a luminance factor Y of not less than 0.80. Off-white colours have a luminance factor Y of not less than 0.57.

NAV CANADA and Transport Canada may designate how many, or which WTGs require twilight and nighttime markings, when there are groups or clusters of WTGs in close proximity to one another. The required types of twilight and nighttime markings consist of the following:

- Two CL-864 lights installed on the nacelle, with one light operating and the second light serving as backup in case of failure of the operating light. The lights are installed on top of each other so that the output of an operating light is not blocked by the standby light for angles of approach or are installed with a horizontal separation of not less than 1 m.
- For a solid support mast, at least three CL-810 lights are installed for an intermediate level at half the nacelle height (± 10 m) and configured to flash at the same rate as the CL-864 light on the nacelle.
- The CL-864 lights are installed in such a manner as to provide an unobstructed view for aircraft approaching from any direction.
- The CL-864 lights are designed to draw power from the electric grid in case of a WTG power failure for continuous illumination.

Figure 2.12 presented below outlines the wind farm lighting requirements according to Transport Canada.

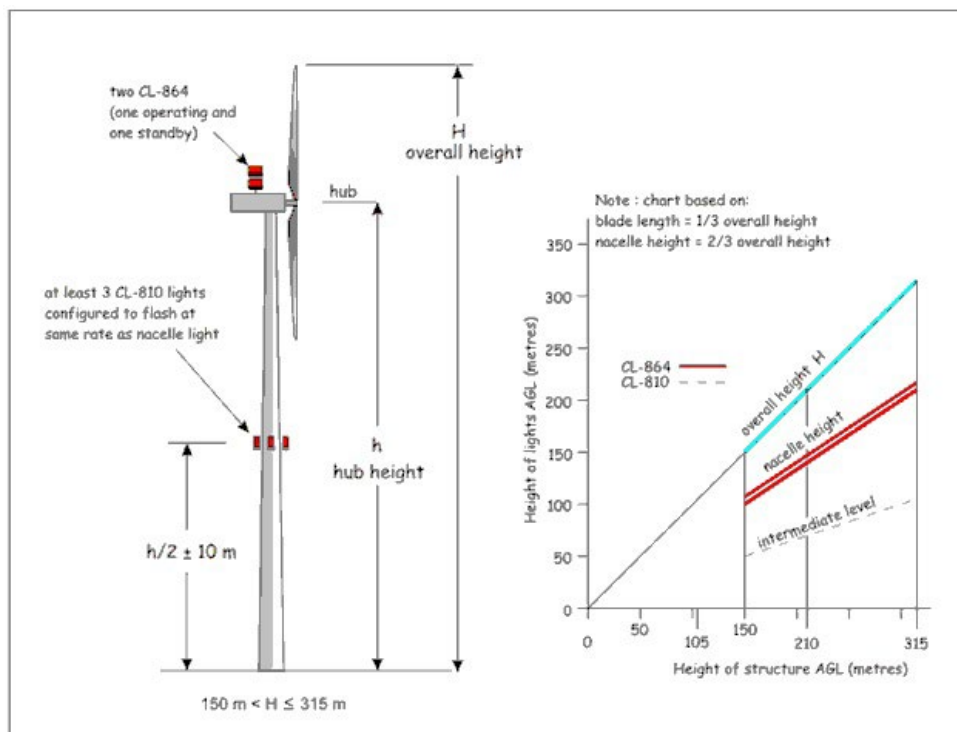


Figure 2.12 Transport Canada Lighting Requirements for WTGs 150 m – 315 m in height per Standard 621 - Obstacle Marking and Lighting

During construction, temporary lighting is required once the WTG structure reaches 60 m or higher. As construction progresses, temporary lights will be moved to the highest point of the completed structure, and additional temporary lights will be used at each level where the structure intervenes.

2.3.10.4 Site Runoff

During the construction and operation of a wind farm, there is no planned effluent or discharges other than site runoff (e.g., stormwater). Stormwater runoff may contain sediment, oils, and chemicals from machinery, which can enter nearby water bodies if not properly managed. CBPPL has existing erosion and sediment control practices and environmental protection protocols which will be implemented and adhere to environmental regulations to reduce these effects and protect local ecosystems (Section 3).

2.3.10.5 Solid and Hazardous Waste

Hazardous materials used during construction and operation of the wind farm, such as diesel, petroleum products, oils, and lubricants, will generate associated hazardous wastes, including used oil and oil filters. These materials are not expected to be present in large quantities, and fuel- or oil-based wastes will be managed through conventional waste-oil and hazardous waste disposal streams in accordance with the Project's WMP (Section 3.2). CBPPL has procedures in place for the handling and storage of hazardous waste which will be updated to incorporate the wind farm component. Hazardous materials and their resulting wastes will be transported, stored, handled, and disposed of in compliance with the applicable regulatory requirements.

The wind energy generation process itself produces only limited hazardous by-products, primarily small volumes of lubricant and hydraulic oils associated with routine WTG maintenance.

2.4 Employment, Expenditures, and Benefits

2.4.1 Employment

The Project, and CBPPL's overall operations, provides substantial employment benefits across multiple sectors, supporting both direct and indirect jobs throughout the region. By maintaining and expanding opportunities in forestry, Mill operations, hydro power, and wind energy, the Project contributes to job stability and growth for local workers and contractors. Moreover, increased activity throughout construction and ongoing operation contributes to the local economy, fosters workforce development, and encourages the prioritization of local hiring. In addition to sustaining established positions, the Project creates new roles, generates temporary employment during construction phases, and strengthens the economic fabric of province, especially in western Newfoundland.

The Project will maintain approximately 1,000 direct jobs within the provincial forest sector, including Mill and DLP employees as well as roles such as forest managers, field staff, harvest contractors, operators, silviculture personnel, truck drivers, road building contractors, and sawmill employees. Ongoing stability for forestry contractors is supported, and there is potential for sawmill expansion. Increased activity and investment may lead to additional employment growth within the forestry and logistics sectors. It is anticipated that there will be the creation of 20 new jobs associated with sawmill expansions and 30 new jobs in trucking and logistics for the province.

With the revitalization of the Mill Site, existing mill employment will be sustained, providing job security for current workers. The Project will also create temporary construction opportunities across multiple trades during upgrades or expansions. It is expected that 80 FTEs will be required during the two years of construction including 23 electricians (NOC code 72202), 13 carpenters (NOC code 72310), 24 mechanics (NOC code 72400), and 20 pipefitters (NOC code 72301). Operational improvements are expected to enhance the long-term stability of Mill operations, supporting continued employment in the region. Jobs in hydroelectric operations and maintenance will also be preserved, contributing to the stability of the local workforce. During construction it is expected that 58 FTEs will be required for the hydroelectric upgrades, including 16 electricians (NOC code 72202), 11 carpenters (NOC code 72310), 10 mechanics (NOC code 72400), and 21 pipefitters (NOC code 72301).

Construction and commissioning phases of the wind farm will generate temporary employment for various trades and skilled workers. During the three-year construction period for the Wind Farm Site, the Project will support approximately 275 direct FTEs in civil engineering, electrical work, logistics, and related fields, along with an estimated 300 indirect FTEs through local services such as transportation, supply, and accommodation. In total, more than 575 direct and indirect jobs for the wind farm are anticipated to be generated across western Newfoundland during wind farm construction, contributing over \$57.5 million in local economic activity through subcontracting, materials, and service procurement.

Table 2.4 presents the various occupations required for Project construction and operation, along with their National Occupational Classification (NOC) codes.

Table 2.4 Wind Farm-related Occupations

Position	Site Preparation Requirements (FTE/yr)	Operation Requirements (FTE/yr)	NOC Code
Steel workers	105	-	72105 – Ironworkers
Electricians	35	-	72202 – Power system electricians
Carpenters	15	-	72310 – Carpenters
Laborers	20	-	75110 – Construction trades helpers and labourers
Machinery operators	60	-	73400 – Heavy equipment operators
Crane operators	20	-	72500 – Crane operators
Electrical line workers	20	-	72203 – Electrical power line and cable workers
O&M Site Supervisor	-	1	70012 – Facility operation and maintenance managers
Administration	-	0.5	13110 – Administrative assistants
WTG Technicians	-	4	72422 – Electrical mechanics
OEM Support Technicians	-	2-4	22301 – Mechanical engineering technologists and technicians
Road Maintenance	-	0.5	72021 - Contractors and supervisors, heavy equipment operator crews 73400 – Heavy equipment operators
TOTAL	275	9	

Based on current regional labour market data and industry assessments completed by Groupe LNA (2021) Inc. on behalf of CBPPL, NL demonstrates a moderate availability of workers across key construction and industrial trades (Héroux, personal communication, December 11, 2025). However, specialized roles, particularly those involving advanced mechanical systems, modernization activities, and hydro-mechanical work, may exceed the capacity of the local labour pool (Héroux, personal communication, December 11, 2025). As a result, some positions for the Project may need to be filled by external workers to adequately supplement the provincial workforce. CBPPL is committed to hiring locally for the Project wherever possible, while recognizing that some positions may need to be filled by workers from outside the region if suitably qualified local candidates are not available.

CBPPL's hiring policies are designed to foster a diverse, equitable, and inclusive workforce in NL. CBPPL is committed to gender equity, dedicated to providing fair opportunities for applicants regardless of gender. This includes a formal gender equity policy that supports equal pay, advancement, and representation throughout the organization.

It is estimated that a substantial portion of our workforce will be recruited from local communities within western NL. CBPPL's focus is on maximizing local employment and supporting community development by prioritizing hiring from the region.

Additionally, CBPPL is dedicated to supporting the training and development of local and Indigenous individuals. CBPPL has played an important role in creating the Centre for Research and Innovation, showing how industry, education, and community can come together. CBPPL's involvement in the Centre connects real industry needs, including the training of current and future workers, to the development of new technologies, and the exploration of sustainable practices. CBPPL will establish agreements and programs in partnership with regional organizations to provide skills training, apprenticeships, and professional development opportunities. These initiatives aim to empower local and Indigenous people to participate fully in CBPPL's workforce, with a commitment to ongoing consultation and collaboration so that training opportunities align with community needs.

2.4.2 Capital Cost and Funding

Kruger is investing \$700 million to revitalize the Corner Brook operations and, transform the site into an Energy and Industrial Hub. This initiative is designed to extend the operational life of the Mill, eliminate the use of oil in steady-state operations, incorporate renewable energy infrastructure, and provide reliable firm power to the province. These measures aim to promote long-term sustainability for both the forestry and manufacturing sectors in NL.

The financial structure established by this investment will also enable Kruger to repay the existing loan to the Government of NL, reinforcing the Project's fiscal responsibility and long-term viability.

Capital costs for the Project have been further refined through preliminary front-end engineering (FEL-2) and ongoing engagement with contractors. The forestry-related capital costs include expenditures for harvesting equipment, chipping yard infrastructure, and transportation assets necessary to support efficient and sustainable operations.

Within the overall investment, the capital costs associated with the Mill are estimated at \$120 million. The DLP component will require a capital investment of \$78 million. The windfarm portion of the Project is estimated at \$475 million. These targeted investments are critical to modernizing the facility and supporting the integration of advanced, energy-efficient technologies for the sustainable operations.

2.5 Project Alternatives

2.5.1 Alternatives to the Project

As described in Section 1.3, the Project is required to expand the revenue stream, and without it, there is no sustainable path forward for the Mill operation. In considering alternatives to the Project as proposed, several options were evaluated, including maintaining the current operational status, reducing production levels, as well as alternate revenue streams. Kruger has completed an exhaustive review over the past 18 months including numerous studies by subject matter experts including Wood Engineering, Deloitte, Valmet, and AFRY to determine a viable and long-term solution for CBPPL. These studies have focused on many products and alternate revenue streams including Black Pellets, Tissue Products, Wood Products, Renewable Energy, Biochar, and Bio-Coal. However, these alternatives do not provide a viable long-term solution. Maintaining or reducing current operations would result in continued revenue decline and increased operational inefficiencies. Therefore, in the absence of the Project, the Mill cannot be sustained.

2.5.2 Alternative Means of Carrying Out the Project

This section presents a discussion of alternatives for the wind farm design and siting considered by CBPPL. Key factors like land ownership, access, wind energy reserves, how the land is used, and how close the site is to homes and communities are checked to help decide the best wind farm location. By thoughtfully considering these elements, the discussion provides the advantages and limitations associated with each alternative. The evaluation process encourages a balanced approach, weighing environmental, social, and economic factors to support informed decision-making during the planning stages of the wind farm.

2.5.2.1 Alternative WTG Sizes and Types

Currently, CBPPL is aiming to use a WTG of similar size and capacity as the Nordex N163 7MW. However, ongoing evaluations may lead to the selection of a different model.

As the Project continues to advance, through the collection of on-site meteorological data, as well as ongoing engineering and construction logistics studies, the final selection of the WTG supplier and model will be confirmed at a later stage.

Key factors influencing WTG selection include:

- Climate suitability (wind speed regime, turbulence intensity, and icing conditions)
- Constructability (transportation logistics and erection requirements)
- Commercial considerations (pricing and availability)

Depending on the results of these analyses, the Project may also consider smaller WTG models in the 4–6 MW range as a contingency, should conditions prove unsuitable for 7 MW-class WTGs. On-site wind measurement began in February 2026. As a year's worth of data is typically required to confidently make decisions on WTG type, size, and number of units to reach the required generation capacity of 155 MW, CBPPL expects to determine WTG model and size early 2027. Discussions with WTG suppliers are currently underway and will continue as Project development progresses.

2.5.2.2 Siting Locations

During the planning phase for the proposed wind farm, six potential sites within CBPPL's existing timber limits were reviewed in 2025 (Figure 2.13). Each location underwent a multi-criteria analysis, considering a range of technical, environmental, and land use factors. Technical aspects included the availability of sufficient wind resources, regional topography, proximity to existing transmission systems, and the suitability of WTG technology. Environmental considerations and setbacks focused on the proximity to residential dwellings (including seasonal cabins) and other noise or visual receptors, the presence of developed infrastructure such as roads and bridges, and proximity to provincial or national parks, nature reserves, protected areas, and environmentally sensitive zones. Additional environmental factors involved predictable watercourses and wetlands, known important habitats for species like the American Marten (*Martes americana atrata*; Newfoundland population), caribou (*Rangifer tarandus*), and other SAR, as well as the extent of official or developed hiking and recreational trail systems. After evaluating alternatives, the currently proposed site ranked highest based on these siting considerations, and no other locations are presently being considered for the Project. Table 2.5 provides a comparison of the six potential sites.

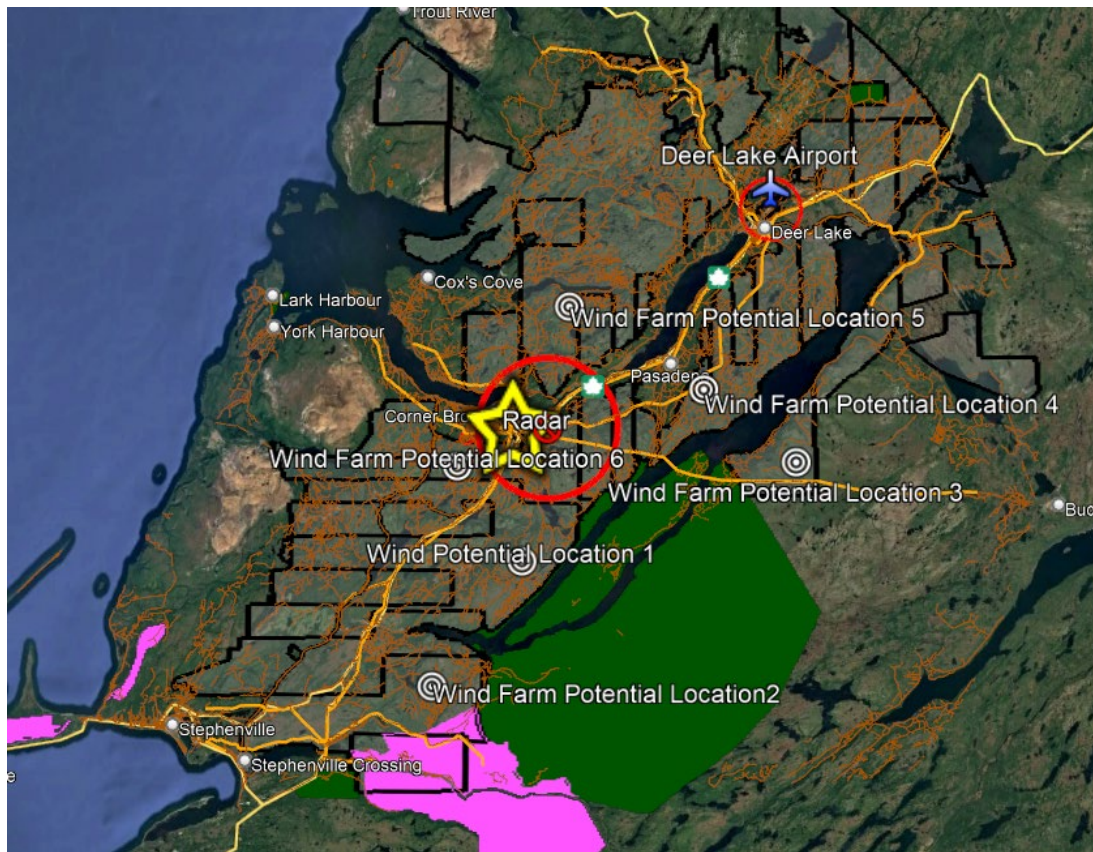


Figure 2.13 Wind Farm Siting Alternatives

Table 2.5 Wind Farm Siting Alternatives

Site	Site Name (Preliminary)	Location	Description	Environmental and Social	Within Existing Forest Tenure	Wind Power Potential	Grid Connectivity (Preliminary)	Road Access	Ranking	Ranking Notes
1	South West Grand Lake Shore	15-20 km South of Massey Drive	Hilly, with some hill tops suitable for positioning wind turbines. Not too far from Massey Drive substation	Some lakes and presence of protected land near the shore of Grand Lake. Area in which harvesting has taken place in the past. Very few cabins in area.	Yes	Excellent wind speed, around 9 m/s at 100 m above ground level	Connect via Masey Drive Substation	Presence of forestry roads in the area, not too far from Corner Brook	1	Least expected environmental and social impact, good access options, close to interconnection, good wind resource
2	Bottom Brook	35-40 km South of Massey Drive	Hilly, with some hill tops suitable for positioning wind turbines. A bit further from the radar.	Some lakes in the valley, however, wind turbines are typically placed on top of Hills.	Yes	Excellent wind speed, around 8.7 m/s at 100 m above ground level	Would need to create new interconnection.	Presence of forestry roads in the area, not too far from Corner Brook or Stephenville.	2	Interconnection not as easy, would require additional substation
3	Grand Lake East Shore	40 km East of Massey Drive, on the other side of Grand Lake	Plateau at 550 m of elevation	Remote site, close to some protected land, but sufficient space to include buffers to lake or wetlands if required	Partially	Excellent, or even extreme wind speed, around 9.5 m/s at 100 m above ground level	Wind Farm would connect to the grid via new substation	Remote site would involve the need of installing a camp during construction and complexify operation and maintenance activities. Limited presence of forestry roads.	3	Remoteness of the site is the main issue here, otherwise, ranking would be higher

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Table 2.5 Wind Farm Siting Alternatives

Site	Site Name (Preliminary)	Location	Description	Environmental and Social	Within Existing Forest Tenure	Wind Power Potential	Grid Connectivity (Preliminary)	Road Access	Ranking	Ranking Notes
4	Pasadena	25-30 km East of Massey Drive	Open Plateau, with some small hill tops	A few lakes with a few cottages, but sufficient space to apply buffers	Yes	Good wind speed, around 8 m/s at 100 m above ground level	Would require building a new transmission line to the Massey Drive Station (25-30 km)	Proximity of Deer Lake could be an asset for O&M. Presence of forestry roads	5	Lesser wind speed, however, sufficient for wind farm development. Local topography would ease site access and civil work. Transmission line would be expensive
5	Hughes Lake	15-20 km North of Massey Drive	Hilly terrain, with some lakes	Presence of cottages, turbines or transmission line could be in view from the Marble Mountain Ski Resort	Yes	Good wind speed, around 8.5 m/s at 100 m above ground level	Would require building a 230 kV line to connect to Massey Drive station. That line would have to cross Humber Valley.	Presence of forestry roads, close to Corner Brook	6	More social impacts. Expensive in terms of interconnection
6	Cooke	10-15 km South West of Massey Drive	Hilly terrain, with some lakes	Some lakes and cabins in the area, site closer to Corner Brook and therefore Marble Mountain. Weather radar at Marble Mountain can be an issue	Yes	Good wind speed, around 8 m/s at 100 m above ground level	Would require a new transmission line direct to Massey Drive	Presence of forestry roads, close to Corner Brook	4	Lesser wind speed, however, sufficient for wind farm development. Local topography would ease site access and civil work. Discussion to have with ECCC regarding the Radar distance

2.5.2.3 Access Road

Three potential access routes were considered for the wind farm (Figure 2.5). Following a review of technical, environmental, and logistical factors, the Lady Slipper Road corridor was identified as the preferred access route for the wind farm. This route follows existing roads, aligns well with Project requirements, and requires limited upgrades compared to other access route alternatives.

The Lady Slipper Road corridor benefits from existing infrastructure, reducing the extent of new civil works and associated disturbance. This corridor prioritizes reducing environmental disturbance, maintaining community safety, and enhancing construction efficiency and will be upgraded in adherence to development guidelines and best practices.

Other access route alternatives, including Gull Pond Road and Pelley's Brook Road, were considered during route selection. While these routes could provide access to the Project Site, they were not advanced as the preferred route due to a combination of technical, environmental, logistical, and infrastructure considerations. Upgrades would be required to accommodate construction traffic, and environmental or land use constraints may arise depending on proximity to sensitive areas.

The Lady Slipper Road has been selected as the preferred option due to its previously established roads and alignment, requiring limited civil works for upgrade or use.

2.5.2.4 Material Requirements

Construction of the wind farm will require aggregate and concrete for access road upgrades, new WTG roads, crane pads, laydown areas, foundations, and other civil works. CBPPL is evaluating alternatives for material sourcing and concrete production to reduce new disturbance, limit haul distances, and meet applicable regulatory requirements. The preferred approach will be confirmed during detailed engineering, once material quantities, geotechnical conditions, constructability requirements, and supplier capacity are better defined.

Aggregate sourcing alternatives include balancing cut and fill within the Wind Farm Site, developing one or more on-site quarry or borrow areas, or sourcing material from existing permitted commercial suppliers. Reuse of material generated during road construction, grading, and foundation excavation would be preferred where suitable and available in sufficient quantity, as it would reduce off-site hauling and additional disturbance. If site-generated material is insufficient or unsuitable, additional aggregate may be obtained from an on-site quarry or local supplier.

For concrete production, CBPPL is evaluating use of an existing fixed concrete plant, owned and operated by a third party, compared with a temporary mobile batch plant within the Wind Farm Site. A fixed plant would avoid establishing an on-site batch plant, but feasibility will depend on production capacity, availability, haul time, ability to deliver concrete within required placement windows, and suitable haul routes. A temporary on-site batch plant may reduce haul times and provide greater control over concrete production, particularly for continuous foundation pours, but would require consideration of siting, water supply, cement and aggregate delivery, wash water management, dust, noise, runoff controls, and applicable permits and approvals.

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A final decision has been not made regarding aggregate sourcing or concrete production. The preferred approach will be selected based on detailed engineering, environmental review, regulatory requirements, construction logistics, cost, and schedule. CBPPL will obtain applicable permits and approvals prior to quarry development or batch plant operation and will implement appropriate management measures through the Project Environmental Protection Plan and related construction management plans.

3 Environmental Management

3.1 Approach to Environmental Management

CBPPL has a longstanding EMS so each of their operations are conducted in an environmentally responsible manner. The EMS is designed to identify, monitor, and control the environmental impacts of the Mill's activities, focusing on continuous improvement and compliance with relevant regulations. Key components include regular environmental audits, employee training, waste reduction initiatives, and proactive measures to protect air and water quality. Through these efforts, CBPPL demonstrates its commitment to sustainability and the long-term health of the surrounding ecosystem. The overall EMS will be adapted to integrate the revitalization upgrades for this Project.

Regulatory compliance is an integrated part of the EMS to identify and manage Project-specific legal and regulatory parameters. Legal compliance obligations and other requirements applicable to activities and related to ownership, tenure and rights are managed through a series of EMS work procedures which incorporate legal tracking, audits and inspections, and compliance verification. Legal requirements include applicable federal and provincial legislation, as well as international agreements and conventions to which Canada is signatory. Meeting the compliance requirements and ISO and SFI® standards is the responsibility of the CBPPL Environmental Management Representative.

CBPPL has established a strong foundation for environmental stewardship through its woodland operations, guided by a comprehensive EMS that aligns with ISO 14001-2015 and SFI® 2022 standards. These principles emphasize continual improvement, risk assessment, and compliance with regulatory requirements, so activities are conducted in an environmentally responsible manner. For this Project, CBPPL will leverage these proven EMS frameworks, adapting existing protocols and procedures to address the environmental parameters associated with wind farm development and operation. This approach will maintain consistency with CBPPL's environmental policy and reinforce the company's commitment to sustainable operations. The integration of the wind farm Project into the EMS provides a structured and effective approach to environmental management. With the addition of Project-specific assessment, mitigation, and monitoring, the framework will meet the requirements of the NL EA process.

CBPPL will review and incorporate relevant principles and policies to create a tailored EMS for the wind farm. This will involve an EMS review to identify and integrate applicable standard operating procedures and management plans already in use, while updating them to reflect the specific requirements of wind energy operations, such as construction impacts and ongoing maintenance. Kruger Energy has 20 years of experience in developing and managing highly diversified renewable energy projects by leveraging established plans and compliance practices and adapting them with Project specific requirements. CBPPL will meet regulatory expectations and support the Kruger's overarching environmental policy (Appendix G).

3.2 Management Plans

As previously noted, the Project covers a range of components including forestry, Mill operations, activities at DLP and Watson's Brook, and the wind farm. Given the first of the three components are currently well understood with existing regulatory guidance, operational procedures and management plans in place, this section is focused on new elements to guide activities associated with the wind farm development.

Development of environmental management plans for the wind farm will be based on CBPPL's established approach to environmental stewardship and regulatory compliance. Through ongoing engagement with regulatory agencies during all phases of the Project, and review of applicable legislation, policies, and guidelines, and internal environmental management documentation from Kruger Energy and our local operations, CBPPL will develop wind farm-specific environmental management plans. These plans will be developed as per the regulatory requirements identified throughout the EA process and will be designed in response to the Projects specific environmental regulatory requirements and commitments. Through the development and implementation of management plans, the biological, physical, and human aspects of the environment will be identified and incorporated into CBPPL EMS.

Table 3.1 provides a list of the anticipated wind farm management plans and associated description of proposed content. The list has been developed based on review of acts, guidelines, and past wind projects in NL, and input from ongoing regulatory engagement, and wind energy industry best practices. Based on CBPPL's experience in woodland operations in NL and existing environmental management systems, and Kruger Energy's experience with wind farm development across Canada, the plans will address the construction and operational aspects of wind farm development.

As the wind farm progresses through the EA process and permitting stages, these management plans will incorporate formal conditions set by regulators, as well as subsequent requirements of permitting processes required for authorization and compliance. The plans will also reflect commitments made in this Environmental Registration, including adoption of good management practices and engagement commitments.

Table 3.1 Proposed Management Plans for the Wind Farm

Management Plan	Description
Environmental Protection Plan (EPP)	The EPP will incorporate environmental aspects, potential effects, and identified mitigation measures for physical, biophysical, and socio-economic components of the wind farm. It will address all phases of the Project including construction, operation/maintenance, decommissioning, and rehabilitation. The development of the EPP will draw on standard operating procedures in place for both the CBPPL's woodland activities and Kruger Energy's wind farm operating procedures. The EPP will also include air emissions and quality management (focused on dust), including blasting and explosive management, and practical guidance for on-the-ground construction crews. The EPP will be reviewed and approved by Wildlife Division prior to Project commencement. An Erosion and Sediment Control Plan (ESCP) will be developed based on existing practices and will be included in the EPP. A Water Resources Management Plan will be developed addressing the safe design of stream crossings and stormwater drainage discharge from the wind farm which will be submitted to the Water Resources Management Division for review and approval prior to construction. It will also include mechanisms for issuing updates of the EPP. Annotated TOC is provided in Appendix H. A Bird and Bat Management Plan will describe measures that will be implemented to reduce adverse effects of Project activities on migratory birds protected by the <i>Migratory Bird Conservation Act</i>, 1994, non-migratory birds that are protected under the <i>Wildlife Act</i>, and species listed under the federal <i>Species at Risk Act</i> and provincial <i>Endangered Species Act</i>. The approach to monitoring birds for the life of the Project will be identified, and results will inform an adaptive management framework, where additional mitigation measures will be identified where elevated bird mortality or other adverse effects are identified.
Species at Risk Impacts Mitigation and Monitoring Plan	This Plan will outline measures to avoid, limit, and monitor potential effects on listed species and their habitats throughout each phase of the Project. This will include pre-construction identification of SAR occurrences and habitat features using available databases and field surveys, implementation of standard and species-specific mitigation measures (e.g., timing restrictions, habitat buffers, reduced disturbance footprints), and integration of these measures into construction and operational procedures. Follow-up monitoring will be undertaken, where warranted, to verify the effectiveness of mitigation measures, with survey methods and scope developed in consultation with relevant regulatory agencies (e.g., NL Wildlife Division). Monitoring results will inform an adaptive management approach, where additional or modified mitigation measures will be implemented if unexpected effects or higher-than-predicted impacts on SAR are observed.
Environmental and Compliance Monitoring Programs	Environmental and compliance monitoring programs will be developed and implemented throughout the life of the Project, including decommissioning and reclamation phases, to meet the requirements of applicable permits, approvals, and conditions of release from the EA process. These programs may include monitoring of birds, bats, SAR, and SOCC. Development of these programs would be done in consultation with appropriate regulators prior to Project commencement.

Table 3.1 Proposed Management Plans for the Wind Farm

Management Plan	Description
Traffic Impact Study and Traffic Management Plan	CBPPL will conduct a Traffic Impact Study as outlined in the Highway Access Policy to demonstrate how the transportation impacts from Project-related traffic can be mitigated and addressed in a manner that is consistent with NLDTI objectives as well as identifying and evaluating transportation related improvements. CBPPL will engage with NL Highway Design staff to review assumptions and parameters of the proposed route. The study will be used to inform the development of a Traffic Management Plan. The Plan will include each phase of the wind farm but will focus primarily on the transportation network required for wind farm construction and transportation of large and heavy components from the Port of Corner Brook to the Wind Farm Site. The Plan will be developed in consultation with NLDTI, City of Corner Brook, and the Port Authority and will include review of temporary and permanent roads, modifications or maintenance to existing roads (including bridges and other crossing structures) and associated permitting requirements. As part of the Plan, CBPPL will obtain the necessary permits for oversize and overweight vehicle travel on Department roadways through the Motor Registration Division of Government Services. Once transportation routes and load specifications (including axle spacing and weights) are defined, the selected routes will be reviewed to confirm compliance and/or identify additional constraints or mitigation requirements.
Emergency Response Plan (ERP)	The ERP will identify the potential for environmental incidents, accidents, implement preventive measures, and effectively respond to emergencies. The ERP would include the required contents and locations of spill response kits, requirements for spill response training, and a communication plan to notify recreational and drinking water users in the impacted area as well as relevant authorities. The ERP will be applicable to environmental emergencies (fire, fuel/oil spill, hazardous substance, and sedimentation) and employee safety emergencies (personal injury and lost employee). The ERP for the wind farm will build on CBPPL's existing ERP for woodlands activities and will implement procedures to identify the potential for and effectively respond to environmental emergencies. Annotated TOC is provided in Appendix I.
Waste Management Plan (WMP)	CBPPL will develop a WMP that identifies liquid and solid waste (domestic and non-domestic) produced during each phase of the wind farm (construction, operation, and decommissioning). It will describe measures for the storage, handling, and disposal of identified hazardous and non-hazardous waste. The WMP will include waste reduction procedures to reduce, reuse, recycle, and manage waste. CBPPL will consider the options for repurposing and recycling wind turbine blades and generator components to reduce the requirement for final disposal to landfill. The WMP will be provided to Pollution Prevention Division for review. Updates to the plan throughout the lifespan of the Project will also be submitted for review; including discussion of options for replacement, recycling and disposal of wind turbine blades as technologies evolve. Annotated TOC is provided in Appendix J.

Table 3.1 Proposed Management Plans for the Wind Farm

Management Plan	Description
Outfitter Environmental Effects Monitoring Plan	CBPPL will develop and implement an Outfitter Environmental Effects Monitoring Plan, in consultation with relevant regulators, affected outfitters, and relevant organizations (e.g., the Newfoundland and Labrador Outfitters Association), prior to construction. The Plan will identify Project-specific interaction pathways with outfitting operations and include mitigation measures such as maintaining or coordinating access to key travel routes, scheduling construction activities to avoid peak outfitting seasons where feasible, implementing standard measures to manage noise and disturbance, and establishing clear communication protocols with affected outfitters. The Plan will also include monitoring during construction and early operation, or other key Project phases as appropriate, to evaluate the effectiveness of mitigation measures. Monitoring will include mechanisms for ongoing engagement, documentation of access or operational concerns, and adaptive management to implement additional mitigation, where warranted. The outcomes of the monitoring program will be used to inform Project activities and reduce potential adverse effects on outfitting operations.
Decommissioning and Rehabilitation Plan	A Decommissioning and Rehabilitation Plan will be developed in consultation with regulators. The Plan will detail procedures to return the site to pre-development, or like pre-development state, including removal of the wind farm associated infrastructure and land restoration. It will also address waste management associated with removing infrastructure and equipment from the site. This plan will be based on industry best practices, and incorporate regulatory guidelines, policies, frameworks at the time of decommissioning.
Indigenous Engagement Plan	An Indigenous Engagement Plan will be prepared to outline the approach for respectful, meaningful, and culturally appropriate engagement with Indigenous communities and organizations that may have an interest in the Project. The Plan will identify engagement objectives, participating communities and organizations, methods of communication and engagement, and procedures for sharing Project information. It will also describe the process for receiving, documenting, considering, and responding to Indigenous community input, including potential interests related to the environment, land use, traditional practices, and cultural resources.
Gender, Equity, Diversity, and Inclusion Plan (GEDIP)	A GEDIP will be implemented that meets the approval of the Minister of Energy and Mines and the Minister responsible for Women and Gender Equality and will be approved by the province before the commencement of Project construction. The GEDIP will outline CBPPL's commitments, goals, and actions to create a more equitable, diverse, and inclusive environment. The GEDIP will identify positions and recruitment planning during each phase, including development, construction and operation. The plan will align with provincial regulatory guidelines and include training and mentoring procedures. A Women's Employment Plan (WEP) will be developed and implemented for the construction phase, reflecting the anticipated workforce requirements and the number of construction-related jobs estimated by CPBPL. The WEP will describe the gender-equity goals and initiatives that CBPPL plans to implement by working collaboratively with contractors and relevant community organizations to support a diverse and inclusive workforce. The WEP will outline measures to promote equitable access to employment opportunities for women, including strategies for recruitment, hiring, retention, and workplace supports.

Table 3.1 Proposed Management Plans for the Wind Farm

Management Plan	Description
Public Engagement and Participation Plan	A Public Engagement and Participation Plan will be prepared to outline the approach for engagement with interested parties, communication activities, and consideration of environmental interests associated with the Project. The Plan will identify engagement objectives, methods of communication and consultation, key participant groups, and procedures for sharing Project information. It will also establish a process for receiving, tracking, documenting, and responding to Project-related inquiries, comments, and feedback. As part of this plan, an Inquiry/Complaint Resolution Plan will be developed describing the process CBPPL will use to receive, investigate, respond to, and resolve inquiries and complaints related to Project Tuckamore. The plan will provide procedures for documenting inquiries and complaints, identifying responsible personnel, establishing response timelines, and communicating outcomes. The plan will include measures for addressing inquiries and concerns, implementing corrective actions where necessary, and maintaining records. Inquiries and complaints and resolution outcomes will be tracked to identify potential recurring issues and support continuous improvement.

3.3 Field and Desktop Studies

To support the development of the Wind Farm Site, and to address potential environmental effects, several field and desktop studies are planned to be conducted pre-construction. These studies are fundamental for providing information on existing conditions, informing Wind Farm Site design, and supporting mitigation and management strategies. Planned studies include:

- **Bird and Bat Studies:** Desktop and field studies of birds and bats are being conducted to determine species presence, relative abundance, and important habitats within the Wind Farm Site. Desktop studies include a review of available literature and publicly available documents, including Atlantic Canada Conservation Data Centre (AC CDC) records of SAR and SOCC, which will inform seasonal surveys. Field surveys include spring and fall migration, breeding bird, and winter bird surveys, as well as acoustic monitoring for bats during both the migration and summer breeding seasons, recognizing that the absence of confirmed records does not necessarily indicate the absence of a species, particularly where suitable habitat exists. Field data collection began in April 2026. Additional details on methods used for the on-going 2026 bird and bat surveys are provided in Appendix K.
- **American Marten Studies:** American marten (Newfoundland marten) hair snag surveys will be undertaken within suitable habitat proximate to the Wind Farm Site area to capture Newfoundland marten (marten) hair samples and confirm the presence and genetic markers of this species within the Wind Farm Site area. The surveys will determine occurrence (detections/non-detections) and the number of marten detections at each hair snag station through DNA analysis of collected hair samples. Prior to deployment, a desktop habitat assessment will be completed to identify potentially suitable survey locations. CBPPL will consult with the Wildlife Division regarding survey methods and permitting requirements associated with the hair snag surveys and subsequent genetic analyses.
- **Vegetation Studies and Micro-siting Assessments:** Desktop and fieldwork will be undertaken to characterize plant communities, identify rare or sensitive species, and assess habitat quality. This information will be used to refine WTG and infrastructure placement (micro-siting) to avoid important ecological features and limit habitat disturbance. Vegetation field studies will be conducted within the footprint of WTG locations planned for the Project, within the transmission line RoW, and along access roads that require upgrades. Vegetation surveys will focus on vascular plant SAR and SOCC. In addition, if vegetation species that the QFN have identified as culturally important are encountered, they will be recorded and shared; though many of these species are expected to be widespread throughout the Wind Farm Site.
- **Targeted Black Ash and Red Pine Surveys:** In consultation the NLDFAL-Wildlife Division, targeted Black Ash and Red Pine surveys will be completed prior to the commencement of Project construction for areas proposed for clearing. Survey methodology will be developed in consultation with the Wildlife Division prior to implementation. A desktop review of suitable habitat within the Wind Farm Site will be undertaken using available information sources to identify priority survey areas. Field surveys will follow guidance provided by Wildlife Division and standard tree survey protocols.

- **Fish and Fish Habitat Surveys:** Placement of watercourse and waterbody infrastructure and use of these crossings will require CBPPL to conduct field surveys to characterize fish and fish habitat and provide a description of the infrastructure required (e.g., fording, bridges, culverts). Desktop reviews of existing data, followed by targeted field studies, will be implemented to assess watercourses, fish presence, fish communities, and habitat quality in areas potentially affected by construction. Fish habitat characterization surveys and fish presence / absence surveys will be conducted within the proposed Project layout. Field surveys will be undertaken to characterize aquatic habitat and collect information on fish communities, including quantitative biodiversity indices and morphometric data, in confirmed or suspected fish-bearing waters potentially affected by the Wind Farm Site. Habitat assessments will be completed at proposed stream crossings, and in-field validation will be undertaken for identified sensitive or critical fish habitat (e.g., spawning, rearing, or overwintering habitat), where applicable. Field surveys will focus on watercourses that may be intersected by new access roads or expansion / upgrades to existing access roads, as well as waterbodies and watercourses that may be directly or indirectly affected by Project activities. Waterbodies or watercourses impacted as a result of temporary or permanent Project components will be characterized and assessed as part of a Request for Review (or Authorization, if required) under the *Fisheries Act* and scheduled salmon rivers will be fully characterized through up-to-date field surveys. Field survey methods will be developed in consultation with DFO and Wildlife Division prior to implementation.
- **Archaeological Assessment:** A Stage 1 Historic Resources Overview Assessment, compliant with the Provincial Archaeology Office requirements, will be conducted. Follow-up field work would be dependent on the results of the desktop assessment.
- **Geotechnical Investigations:** Geotechnical investigations will be conducted to understand the subsurface conditions at proposed WTG and infrastructure locations. This includes soil sampling, borehole drilling, and laboratory testing to determine soil strength, composition, and groundwater presence. The results will guide foundation design, construction planning, and identify geotechnical risks such as slope instability or ground settlement.
- **Traditional Use Study (TUS):** A traditional use study will be carried out to identify and evaluate areas of cultural, historical, and subsistence significance to local Indigenous communities within and surrounding the Wind Farm Site. The TUS will involve engaging Indigenous groups to collect relevant information and learn about issues and concerns, reviewing land use records, and mapping sites of importance such as hunting grounds, gathering sites, and spiritual locations.
- **Land and Resource Use Survey:** An online Land and Resource Use Survey has been developed to engage the public and solicit feedback, identify land and resource use activities that occur in the proposed Wind Farm Site, and to identify public perceptions around the potential challenges and/or benefits of the Project. The survey went live on August 26, 2026, and will be available until October 9, 2026. The results of the survey will be used to inform and support Project planning. The survey will be promoted by CBPPL and will be made available to the public during the Environment Registration review process. The survey has been provided to 14 groups for their consideration and to share with members and other interested parties. The survey has been posted through media channels to CBPPL union, employee and retiree groups and also posted in public areas and bulletin boards in the community. The Land and Resource Use Survey, which is available through an online survey platform, is provided in Appendix L.

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In addition to the studies noted above, CBPPL has engaged Hatch in the development of a Visual and Shadow Flicker Study (Hatch 2026b, Appendix E), Noise Assessment Study (Hatch 2026a, Appendix F), and Visualization Study (Hatch 2026c, Appendix M), which are appended to this report. Results from these studies will be integrated into Project planning and the preparation of environmental management plans, supporting construction and operation that is environmentally responsible.

4 Engagement

4.1 Overview of Engagement Strategy

4.1.1 Objectives of the Engagement Strategy

CBPPL is committed to early and ongoing engagement with interested parties throughout all phases of the Project. CBPPL's approach to engagement focuses on sharing Project information, seeking feedback, listening to potential concerns, and providing opportunities to answer questions.

4.1.2 Identification of Interested Parties

Early in Project planning, interested parties were identified. These interested parties are defined as individuals, groups, or organizations that may be affected by the Project or have an interest in its outcomes. This includes those experiencing potential environmental, social, economic, or cultural impacts, as well as parties with legal rights or responsibilities related to the Project. Key groups typically include Indigenous communities, local residents and landowners, businesses, recreational land users, government representatives, business or industry representatives and non-governmental organizations.

4.1.3 Engagement Methods

CBPPL is currently in the process of conducting engagement with interested parties to share Project information, seek feedback, and answer questions.

To encourage open communication and meaningful dialogue, a Community Engagement Office (Figure 4.1) has been established to provide interested parties with direct access to CBPPL and information about the Project. The Community Engagement Office opened on July 15, 2026, and is staffed by Project team members. The office is located at 3 Mill Road, Corner Brook (adjacent to the Mill). It offers barrier-free access, a child-friendly environment, and is open to the public Monday through Friday from 10:00 a.m. to 2:00 p.m. Appointments are also available outside of these hours upon request.

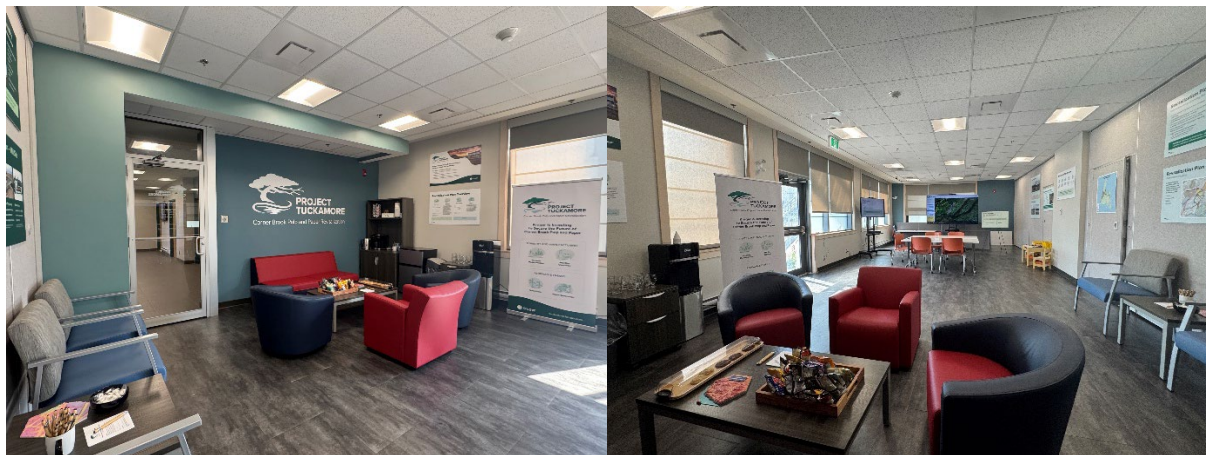


Figure 4.1 Community Engagement Office

The Community Engagement Office includes materials such as, but not limited to, mapping, poster boards, visual presentations, geographic information system (GIS) data, and current Project updates. The opening of the Office has been advertised on two radio stations, including VOCM St. John's and Bay FM 100.1 as well as included on Project information sheets and newsletters. Information on the Community Engagement Office is being advertised on three digital advertising signs in Corner Brook and one sign in Deer Lake and on the Project website.

A visitor log has been established to record visitors to the office. The visitor log includes information such as date, name, contact details, topic/category, question or concern raised, and follow-up requirements.

In addition to the Community Engagement Office various methods are and will be used for engagement including:

- In-person/virtual meetings
- Dedicated Project Website: tuckamore.kruger.com
- Toll-free phone line: 1 844 488-3003
- Email address: tuckamore@kruger.com
- Project Information Sheets
- Frequently Asked Questions
- Business Information Sessions
- Project Information Updates

Since its launch on June 15, 2026, the Project Tuckamore website has provided an accessible source of information about the project, attracting more than 1,100 visitors and 2,000 page views. Interest generated through local media coverage, online searches, and other sources highlights strong public awareness of the project and demonstrates the effectiveness of the project's information-sharing and engagement efforts.

A summary of engagement activities conducted to date is provided in Tables 4.1 and 4.2.

4.1.4 Reporting and Documentation

Engagement activities are documented using a structured approach. Reporting and records will document who was engaged, what input was received, and how applicable input influenced Project design and the assessment. This includes maintaining an engagement log that records interactions (dates, participants, topics, and outcomes), along with detailed meeting records and summaries where appropriate. An issues and response tracking table has been established to link feedback to Project decisions and mitigation measures. Correspondence and engagement materials (e.g., presentations and reports) will be retained as part of the Project record.

For Indigenous engagement, documentation will additionally capture how Indigenous knowledge was incorporated and protected, in a manner that respects confidentiality and data sovereignty.

Additionally, in advance of construction an Inquiry/Complaint Resolution Plan will be developed describing the process CBPPL will use to receive, investigate, respond to, and resolve inquiries and complaints related to the Project. The plan will provide procedures for documenting inquiries and complaints, identifying responsible personnel, establishing response timelines, and communicating outcomes. The plan will include measures for addressing inquiries and concerns, implementing corrective actions where necessary, and maintaining records. Inquiries and complaints and resolution outcomes will be tracked to identify potential recurring issues and support continuous improvement.

4.2 Results of Engagement to Date

4.2.1 Indigenous Engagement

CBPPL recognizes and respects Indigenous rights and interests, including environmental stewardship and sustainable development (Figure 4.2). CBPPL is committed to early and ongoing engagement through the life of the Project and will explore opportunities to incorporate Indigenous knowledge and perspectives in Project planning.

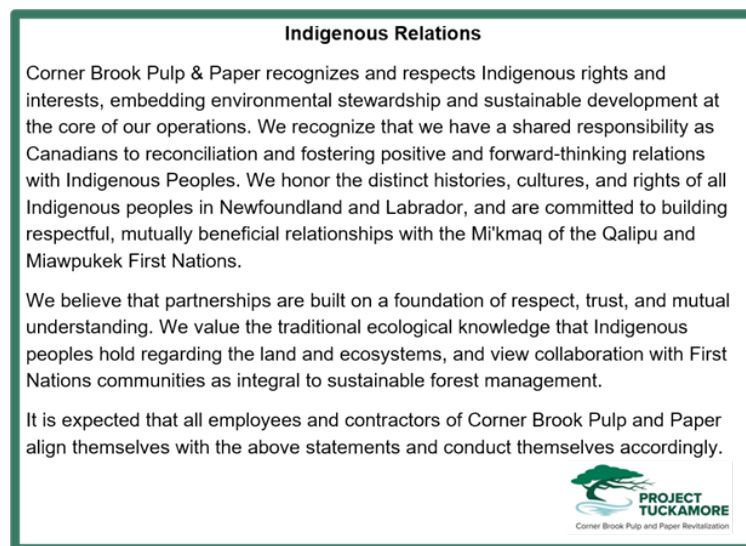


Figure 4.2 CBPPL Indigenous Relations

The nearest Indigenous group to the Project is the Qalipu First Nation (QFN), a member of the Mi'kmaq Nation, whose territory, Mi'kma'ki, stretches from Maine to Quebec, through the Maritime provinces, and into Ktaqmkuk (Newfoundland). The QFN was established in 2011 as an Indigenous Band under the federal *Indian Act* and consists of approximately 23,000 members, including the nine Mi'kmaq Nations formerly represented by the Federation of Newfoundland Indians (Government of NL n.d.; QFN n.d.). The Qalipu members reside within 67 communities across the Island.

QFN's governance structure includes an elected Chief and Council, nine electoral ward councillors, and two Vice-Chiefs representing western and central Newfoundland. The Qalipu Council maintains a central administrative office in Corner Brook and four satellite offices in Glenwood, Grand-Falls Windsor, St. George's, and Stephenville.

The Mi'kmaq of Newfoundland, including Qalipu, continue to harvest traditional resources for subsistence, recreational, and food social ceremonial purposes. Contemporary land and resource management is undertaken by the Qalipu Natural Resource Division, who conduct research and monitoring on several species important to the community.

CBPPL began engagement in the early stages of Project planning, with the QFN stating their interest in the Project. The QFN and CBPPL have discussed preferred methods of communication and engagement including opportunities for co-hosted events in communities.

Additionally, CBPPL has initiated engagement with the Miawpukek Mi'kamawey Mawi'omi First Nation. Located in and around Conne River on the south coast of the province, the Miawpukek Reserve was established, according to traditional oral history, in 1870. It was officially designated as Samiajij Miawpukek Indian Reserve under the *Indian Act* in 1987. There are 822 members on-Reserve and 2,238 off-Reserve. Most members are registered Indians under the federal *Indian Act*.

The Nation's governance structure includes an elected Chief and six Council members. The administrative office is located in Conne River.

Table 4.1 provides a summary of engagement activities conducted to date.

Table 4.1 Details of Indigenous Engagement Conducted to Date

Organization/Community	Date	Method	Details
Qalipu First Nation	August 19, 2025	In person	Meeting between Kruger executive and QFN Chief on high-level Project concept overview.
Qalipu First Nation	January 9, 2026	In person	Presentation to Chief and Council on Project overview. Discussed with council full tree harvesting vs. current cut to length, mill manufacturing changes, and windfarm siting.
Qalipu First Nation	March 10, 2026	Virtual	Provided a Project update, discussed the process and schedule for the Environmental Registration. Discussed potential opportunities to collaborate on environmental data collection, and approach to engagement.
Qalipu First Nation	March 23, 2026	In person	Update on status of Project and arranging a meeting with Chief and Council to provide a Project update and discussion.
Qalipu First Nation	April 27, 2026	In person	Provided a Project update, including schedule. Discussed the QFN's preferred communication and engagement methods and timing of updates.
Qalipu First Nation	April 27, 2026	In person	Provided a Project update to Chief and Council. Appendix N includes presentation slides.
Qalipu First Nation	April 28, 2026	Virtual	Reviewed Project study area and discussed relative to the QFN GIS land use database.
Qalipu Education and Training Division	July 22, 2026	In person	Meeting to discuss partnerships on the Project.

Organization/Community	Date	Method	Details
Miawpukek First Nation	August 4, 2026	Email	Provided a brief introduction to Project and information on Community Engagement Office. Invited Chief, Chief's assistance and general manager to a virtual or in-person meeting.
Qalipu First Nation	August 13, 2026	In person	Provided Project update. Email with two-page information sheet also provided.
Qalipu First Nation	August 27, 2026	Email	Provided a link to Land and Resource Use Survey with request for inclusion in their communication channels.

4.2.2 Engagement with Other Interested Parties

Parties that may have an interest in the Project include, but are not limited to, those listed below. As engagement progresses, additional interested parties may be identified.

- Residents, cabin owners, landowners, businesses located in, or proximity to the Project activities
- Land and Resource Users (trapping, hunting, fishing, recreational)
- Land and Resource Organizations
- Environmental Organizations
- Industry Associations
- Academic and Research Institutions
- Trades Institutions
- Municipal, Provincial, and Federal Government Representatives

Table 4.2 provides a summary of engagement activities conducted to date.

In addition, presentations were made to CBPPL employees, retirees, and Burtons Cove Lumber. The employee information sessions included 13 sessions with 211 employees of the Mill, woodlands, and Deer Lake Power operations. Furthermore, employees were mailed the two-page Project information sheet (Appendix J). There were four retiree sessions, attended by 73 retirees. A joint letter of support was provided by CBPPL retirees for the Project (Appendix K). The presentation at Burton's Cove Lumber in Hampden was attended by 37 employees and management at the sawmill site.

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Through engagement conducted to date letters of support have been received and are provided in Appendix O. To date, letters of support have been received from:

- City of Corner Brook
- Town of Massey Drive
- Town of Deer Lake
- Port of Corner Brook Corporation
- Unifor Local 242
- Unifor Local 96
- Greater Corner Brook Board of Trade
- Deer Lake Regional Airport Authority
- Newfoundland and Labrador Snowmobile Federation
- College of the North Atlantic
- Angler Solutions
- Corner Brook Industrial
- Sustainable Resource Management Inc.
- Green Infrastructure Partners Inc.
- Rotary Club of Corner Brook
- LOGISTEC
- PARDY'S Waste Management and Industrial Services Limited
- BlackStar Solutions Inc.
- Econext
- Atlantic Industrial Projects Inc.
- Green Bay Marine Base Inc.
- Brook Construction
- Cabox Geopark
- Crane Supply
- Digital Advertising Solutions
- DT Martin
- Rexel Atlantic
- Baileys Marine
- Wajax
- Resource Innovations
- Caribou Industries
- Battlefield Equipment
- Corner Brook Fab & Steel
- RR HVAC & Controls
- United Rentals
- Westlund pipe valve fittings
- Western Steel Works
- Graybar Canada
- Pedal and Shift
- Access Scaffolding Department
- West Coast Excavating

Table 4.2 Details of Engagement Conducted to Date

Group / Organization	Date	Method	Details
Local Municipalities			
City of Corner Brook	November 7, 2025	Presentation / Discussion	Initial review of Project objectives and high-level scope.
	April 30, 2026	Presentation / Discussion	Review of full Project scope, schedule, and next steps.
	June 5, 2026	Phone Call	Follow-up on Project discussion.
	June 16, 2026	Phone Call	Follow-up on Project discussion.
	June 23, 2026	Presentation / Discussion	Review of full Project scope, schedule, and next steps.

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Table 4.2 Details of Engagement Conducted to Date

Group / Organization	Date	Method	Details
Town of Deer Lake	June 19, 2025	Presentation / Discussion	Initial review of Project objectives and high-level scope.
	May 13, 2026	Presentation / Discussion	Review of full Project scope, schedule, and next steps.
Town of Massey Drive	June 16, 2026	Email	Request for meeting by CBPPL.
	July 22, 2026	Presentation / Discussion	Review of Project scope, schedule and next steps.
	August 12, 2026	Email	CBPPL provided additional Project details regarding truck traffic in the Town. Offered an additional meeting.
Economic & Industry Organizations			
Equiforce (Women in Resource Development Corporation)	June 16, 2026	Email	Request for meeting by CBPPL.
	June 24, 2026	Presentation / Discussion	Initial review of Project objectives and high-level scope to Strategic Programs and Partnerships.
	July 17, 2026	Presentation / Discussion	Discussion on workforce diversity, gender equity, and inclusion initiatives and programs with Employer Services Division.
	August 14, 2026	Teams Meeting	Discussion of opportunities to organize and support a STEM program on the west coast.
Greater Corner Brook Board of Trade	May 29, 2026	Phone Call	Request for meeting by CBPPL.
	June 2, 2026	Presentation / Discussion	Initial review of revitalization Project objectives and high-level scope.
	July 14, 2026	Meeting	Keynote Presentation at Greater Corner Brook Board of Trade Luncheon to provide overview of Project Tuckamore and announce opening of Community Engagement Office. Attended by 72 participants.
	August 27, 2026	Email	Sent Land and Resource Use Survey to be emailed to Greater Corner Brook Board of Trade members.
Office to Advance Women Apprentices	June 16, 2026	Email	Request for meeting by CBPPL.
	July 22, 2026	Meeting	Initial review of revitalization Project objectives and high-level scope.
	August 10, 2026	Email	CBPPL provided information on skilled trades required for wind farm construction.
econext	July 14, 2026	Presentation/Discussion	Initial review of Project Objectives and high-level scope.
	July 18, 2026	Email	Sent two-page Project information sheet which was included in the econext newsletter to over 2,100 subscribers

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Section 4 Engagement
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Table 4.2 Details of Engagement Conducted to Date

Group / Organization	Date	Method	Details
Equiforce	June 16, 2026	Email	Request for meeting by CBPPL.
	July 17, 2026	Presentation/Discussion	Initial review of Project Objectives and high-level scope.
Trades NL	July 16, 2026	Email	Request for meeting by CBPPL
	July 30, 2026	Presentation/Discussion	Initial review of Project objectives and high-level scope. Discussion regarding role and mandate of Trades NL
	August 5, 2026	Email	Sent two-page Project information sheet with request to distribute through email blast to 14 associated unions to over 10,000 members.
	August 13, 2026	Telephone and email	CBPPL provided employment and workforce information.
WISE NL	August 19, 2026	Email	Introduction to Project Tuckamore, invitation to connect to discuss ways to encourage better employment equity, diversity and inclusion during project construction and long-term.
Companies (Transportation & Logistics)			
Corner Brook Port Corporation	January 29, 2025	Presentation / Discussion	Initial review of revitalization Project objectives and high-level scope.
	April 14, 2025	Presentation / Discussion	Initial review of revitalization Project objectives and high-level scope.
	August 26, 2025	Presentation / Discussion	Initial review of revitalization Project objectives and opportunities for partnership.
	March 23, 2026	Presentation / Discussion	Review of full Project scope, schedule, and next steps.
Deer Lake Airport Authority	June 5, 2026	Phone Call	Request for meeting by CBPPL.
	June 30, 2026	Presentation/Discussion	Review of Project objectives and high-level scope.
Logistec	May 29, 2026	Phone Call	Request for meeting by CBPPL.
	June 2, 2026	Presentation / Discussion	Initial review of Project objectives and high-level scope.
Companies (Hospitality)			
Autumn Gale	August 6, 2026	Email	Sent two-page Project Summary, invited to visit Community Engagement Office and provided link to website to sign-up for Project newsletter
Comfort Inn	August 6, 2026	Email	Sent two-page Project Summary, invited to visit Community Engagement Office and provided link to website to sign-up for Project newsletter

Table 4.2 Details of Engagement Conducted to Date

Group / Organization	Date	Method	Details
Glynmill Inn	August 6, 2026	Email	Sent two-page Project Summary, invited to visit Community Engagement Office and provided link to website to sign-up for Project newsletter
Greenwood Inn	August 10, 2026	Email	Sent two-page Project Summary, invited to visit Community Engagement Office and provided link to website to sign-up for Project newsletter
Quality Inn	August 6, 2026	Email	Sent two-page Project Summary, invited to visit Community Engagement Office and provided link to website to sign-up for Project newsletter
Academic and Research Institutions			
College of the North Atlantic (CNA)	June 19, 2026	Presentation / Discussion	Initial review of Project objectives and opportunities for partnership.
	June 25, 2026	Discussion	Discussion on opportunities for partnership.
CNA, Grenfell Campus (MUN)	June 9, 2026	Presentation / Discussion	Discussion on opportunities for partnership.
Memorial University of Newfoundland (MUN) Grenfell Campus	May 13, 2026	Presentation / Discussion	Review of full Project scope, schedule, and next steps.
School of Science and the Environment, Grenfell Campus (MUN)	May 29, 2026	Email	Request for meeting by CBPPL.
	June 15, 2026	Presentation / Discussion	Initial review of Project objectives and high-level scope.
ACAP – Humber Arm (Atlantic Canada Action Plan)	July 9, 2026	Presentation / Discussion	Initial review of Project objectives and high-level scope.
	July 16, 2026	Email	Sent two-page Project information sheet and contact information/hours for Community Engagement Office as well as link to website.
Academy Canada	August 10, 2026	Discussion	Initial review of project scope and objectives. Discussion regarding Workforce Solutions and other training programs offered by Academy Canada. Provided 2- page Project information sheet.
Apprenticeship and Trades Certification Division of Department of Education and Early Childhood Development	August 21, 2026	Presentation/Discussion	Initial review of Project objectives and high-level scope. Discussion with Apprenticeship Program Officers

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Table 4.2 Details of Engagement Conducted to Date

Group / Organization	Date	Method	Details
Community Associations and Local Resource Users			
Local Cabin Owner (Trappers Pond)	May 29, 2026	Phone Call	Request for meeting by CBPPL.
	June 5, 2026	Presentation / Discussion	Initial review of Project objectives and high-level scope.
NL Outfitters Association	May 29, 2026	Phone Call	Request for meeting by CBPPL.
	June 23, 2026	Presentation / Discussion	Initial review of Project objectives and high-level scope.
	August 26, 2026	Email	Sent Land and Resource Use Survey to be circulated to members.
NL Snowmobile Federation	June 23, 2026	Phone Call	Request for meeting by CBPPL.
	July 14, 2026	Presentation / Discussion	Meeting to discuss the Project components.
	August 26, 2026	Email	Sent Land and Resource Use Survey to be circulated to members.
Western SnoRiders	August 26, 2026	Email	Request for meeting by CBPPL.
NL Trappers Association	May 29, 2026	Email	Request for meeting by CBPPL.
	June 8, 2026	Email	Follow-up request for meeting by CBPPL.
	June 26, 2026	Presentation / Discussion	Initial review of Project objectives and high-level scope.
	July 16, 2026	Email	Sent two-page Project information sheet and contact information/hours for Community Engagement Office as well as link to website to share with association members.
	August 26, 2026	Email	Sent Land and Resource Use Survey to share with members.
Pinchgut Lake Property Owners Association	May 29, 2026	Email	Request for meeting by CBPPL.
	June 8, 2026	Presentation / Discussion	Initial review of Project objectives and high-level scope.
	August 27, 2026	Email	Sent Land and Resource Use Survey to share with members.
Where Ya Wanna Bee Outfitters	May 29, 2026	Phone Call	Request for meeting by CBPPL.
	June 1, 2026	Phone Call / Discussion	Initial review of Project objectives and high-level scope.
	June 3, 2026	Presentation / Discussion	Review of Project objectives and high-level scope.
	June 3, 2026	Phone Call	Request for follow-up discussion by CBPPL.

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Table 4.2 Details of Engagement Conducted to Date

Group / Organization	Date	Method	Details
Lakeside Trail Group	June 17, 2026	Email	Request for meeting by CBPPL.
	July 14, 2026	Email	Request for meeting by CBPPL.
	August 13, 2026	Email	CBPPL provided two-page information sheet and invitation to meet at the Community Engagement Office.
	August 27, 2026	Email	Sent Land and Resource Use Survey to share with members.
West Pinchgut Lake cabin owner's informal association	July 3, 2026	Email	Request for Meeting by CBPPL.
	July 14, 2026	Presentation/Discussion	Initial review of Project objectives and high-level scope.
	August 26, 2026	Email	Sent Land and Resource Use Survey.
NL T'Railway	July 8, 2026	Presentation/Discussion	Initial review of Project objectives and high-level scope.
	August 26, 2026	Email	Sent Land and Resource Use Survey to share with members.
SPAWN & Atlantic Salmon Federation	July 14, 2026	Presentation/Discussion	Initial review of Project objectives and high-level scope.
	August 6, 2026	Discussion	Discussion regarding location of transmission line crossing of salmon tributary
	August 26, 2026	On-site meeting	Site visit to windfarm area with SPAWN representative to view potential routings for transmission line to understand concerns.
	August 26, 2027	Email	Sent Land and Resource Use Survey to share with members.
Cabox Geopark	July 23, 2026	Email	Request for meeting by CBPPL.
	July 31, 2026	Presentation/Discussion	Initial review of Project objectives and high-level scope with Geopark Lead.
	August 3, 2026	Email	Discussions regarding a Memorandum of Understanding with Cabox Geopark around harvesting/activity in the Geopark.
	August 26, 2026	In Person	Project summary and overview for the Cabox Geopark team at the Community Engagement Office.
	August 27, 2026	Email	Sent Land and Resource Use Survey to share with members.
Receptor cabin owners	July 12, 2026 – July 19, 2026	Delivery in-person	Two-page Project information sheet on objectives and high-level scope delivered in-person to receptors in area of windfarm.

Table 4.2 Details of Engagement Conducted to Date

Group / Organization	Date	Method	Details
Hospitality NL	July 3, 2026	Email	Request for meeting by CBPPL.
	July 15, 2026	Presentation/Discussion	Initial review of Project objectives and high-level scope.
	July 21, 2026	Email	Follow-up email with two-page Project information sheet and link to website.
	July 24, 2016	Newsletter	Hospitality NL included two-page information sheet in their newsletter distributed to over 500 tourism members and interested parties.
	August 26, 2026	Email	Sent Land and Resource Use Survey to include in newsletter.
Western Environmental Centre	Aug 11, 2026	Email	Sent email with two-page project summary, link to website, invitation to visit Community Engagement Office.
Corner Brook Status of Women Council	Aug 11, 2026	Email	Sent email with two-page project summary, link to website, invitation to visit Community Engagement Office.
Girl Guides of Canada, Western NL Zone 2, Camp 184 Gull Pond Road	Aug 11, 2026	Email	Sent email with two-page project summary, link to website, invitation to visit Community Engagement Office.
Community Pop-up	August 11, 2026	In-person	Pop-up session at Margaret Bowater Park, handed out Project Information sheets.

4.3 Regulatory Engagement

CBPPL has proactively initiated engagement efforts with the provincial government to confirm that the Project aligns with regulatory expectations and environmental standards. As part of this process, CBPPL held meetings with the EA Division to discuss the details of the Project and the associated EA process. These discussions provided an opportunity to clarify requirements and establish a collaborative approach to regulatory compliance.

In addition to consultation with the EA Division, CBPPL organized meetings with various government departments to review the Project at a high level and address potential questions. These sessions helped identify regulatory issues and gather input from relevant interested parties. CBPPL has also engaged local Members of the House of Assembly to introduce the Project, discuss its objectives and key components, and provide an opportunity for questions and feedback. A copy of the presentation is provided in Appendix J. By fostering open dialogue, CBPPL demonstrated its commitment to transparency and responsible Project development.

Furthermore, site visits were arranged with eight government officials to tour the Mill and Wind Farm Sites on June 4 and 18, 2026. The purpose of the visits was to provide representatives from key regulatory bodies with an in-person overview of the locations involved in the Project. During the tours, government officials had the opportunity to observe current site conditions and ask questions directly to the Project team. This collaborative engagement allowed for open dialogue regarding site-specific considerations and potential environmental effects. Feedback received from the EA Division and other departments was considered and incorporated into this Environmental Registration. CBPPL is committed to continuing to engage with provincial authorities, meeting environmental obligations and responding to community and government feedback throughout the Project lifecycle.

To date, the following Government of NL departments have been involved in regulatory consultation on the Project:

- Department of Environment, Conservation and Climate Change
 - Climate Change Branch
 - EA Division
 - Pollution Prevention Division
 - Water Resources Management Division
- Department of Energy and Mines
- Department of Forestry, Agriculture and Lands
 - Crown Lands Division
 - Lands Management Division - Agriculture Lands
 - Lands Management Division - Planning
 - Wildlife Division
- Department of Health and Community Services
- Department of Tourism, Culture, Arts and Recreation
 - Tourism and Parks Branch
 - Provincial Archaeology Office
- Department of Transportation and Infrastructure

CBPPL will continue to consult with government departments and agencies throughout the EA review process and during preparation of follow-up and monitoring programs.

4.4 Feedback

Feedback received to date is provided in Table 4.3. CBPPL will continue to engage with interested parties to address questions.

Table 4.3 Engagement Feedback Received to Date

Comments / Questions Raised	Response / Commitment
Project Description / Component	
What will be the access roads for the project? Are there any new roads required for the wind farm?	Project access will use existing roads where available to reduce environmental disturbance. However, the construction of new access roads may be required to reach certain sites, particularly for WTG installation. Access roads required for the Project are described in Section 3.3.2. New roads will be constructed and maintained in accordance with existing mitigation and management practices developed by CBPPL for current forestry operations.
How many truckloads of concrete will be required?	The total number of concrete truckloads required will depend on final Project design and site conditions. A detailed logistics plan will be developed prior to construction, and estimates will be available as engineering and procurement plans are finalized.
What is the footprint size of windmill turbines?	Based on the current Project design, each WTG / crane pad is expected to occupy approximately 100 m × 80 m (8,000 m ²). For a project with up to 22 turbines, the total direct WTG pad area is estimated at approximately 17.6 hectares. The final footprint of each turbine location will be confirmed during detailed engineering and geotechnical investigations.
Are explosives required, and if so, what is the quantity?	The use of explosives may be necessary for certain construction activities, such as foundation excavation or road building. If explosives are required, safety protocols and regulatory requirements will be followed. Quantities will be determined during detailed engineering and shared with relevant authorities and interested parties. Blasting will be limited, to the extent practical, to daytime hours by a licenced contractor. Best management plans outlined in guidance documents such as the Blasters Handbook (ISEE 2016) will be implemented. The blasting layout and sequence will be designed to reduce impulsive noise emissions, and public awareness notices will be issued to advise of planned blasting events. Necessary permits and mitigation measures will be in place prior to blasting activities.
Will chemical methods be used for deforestation or vegetation clearing?	No chemical methods (e.g., herbicides) are proposed for vegetation clearing associated with the Project. CBPPL recognizes the importance of these lands to Qalipu First Nation and other land users who harvest berries, forage, and participate in traditional and recreational activities within the area. As described in Section 3.3.3, site preparation, including vegetation clearing, will be conducted using conventional mechanical methods and carried out in accordance with established forestry and environmental management practices.
Will there be an increase in water usage?	Exact water use volumes required for construction of the wind farm are currently unknown. Water use for the wind farm will primarily come from cement requirements for the foundation of the WTGs. CBPPL is considering options for cement including the use of an existing facility, as well as the construction and operation of mobile cement batch plant. Quantities will be determined during detailed engineering and shared with relevant authorities.
Have you considered pumping water back upstream to aid in conservation of water?	Pumping water back upstream was considered, however, CBPPL can offset water usage by using more wind energy, when the wind is blowing, to preserve lake level.
Will there be repairs to Watsons Brook penstock?	As part of the Project, upgrades at Watson's Brook include replacement of the upper penstock to support long-term reliability and performance. This work forms part of broader hydroelectric modernization activities. Additional information is provided in Appendix C.

Table 4.3 Engagement Feedback Received to Date

Comments / Questions Raised	Response / Commitment
What does grid integration look like for storage & variable power?	There will be in effect two energy storage methods. The first is pulp storage at the Mill. When there is excess wind, CBPPL will produce more pulp than the paper machine can consume and store it (up to 400 metric tonnes is proposed). Then when the wind is reduced and less power is available for pulp production, the stored pulp will be consumed. The second energy storage option is Grand Lake. When there is an excess of wind beyond what the paper machine can consume and what CBPPL can store, CBPPL will reduce the amount of power supplied to the grid by Deer Lake and use wind energy for grid requirements. CBPPL will preserve lake level allowing us to consume this extra energy when the wind energy available is reduced.
How will excess wind be used?	When there is an excess of wind power beyond what the paper machine can consume and what CBPPL can store as pulp, CBPPL will reduce the amount of power supplied to the grid by Deer Lake and use wind energy for grid requirements. CBPPL will preserve lake level allowing us to consume this extra energy when the wind energy available is reduced.
Forestry / Mill Operations	
Has there been research conducted on harvesting and long-term forestry viability?	CBPPL has worked with groups including FP Innovations on timber analysis and sustainability studies. The long-term viability is regularly reviewed through the five-year planning and approval process as well as through audits on the CBPPL certification standards including ISO 14001 Environmental Management Standard, SFI® Forest Management Standard, and SFI® Fibre Sourcing Standard.
Concern around increase on volume of harvest. With the proposed increased AAC where will the additional approximately 100,000 AAC come from?	CBPPL recognizes concerns regarding the proposed increase in harvest volume. The increase in AAC to 723,000 m³ has been modeled to support long-term sustainability within the CBPPL timber limits. This increase coincides with an increase in silviculture activities (doubling of recent levels) which includes tree planting and thinning activities to sustain the resource long-term. CBPPL forest harvesting activities are certified and audited to international standard including ISO 14001 Environmental Management Standard, SFI® Forest Management Standard, and SFI® Fibre Sourcing Standard.
Do you plan to shift more to tree planting?	CBPPL plans to increase silviculture activities, including tree planting and thinning, to support long-term forest sustainability. Tree planting efforts are expected to increase as part of forestry modernization initiatives, which are designed to maintain a sustainable timber supply within existing allowable harvest levels.
How will you collaborate with Grenfell researchers on wood upcycling opportunities?	CBPPL is actively working with Grenfell in creating a research hub for renewable energy. Focus will be on projects related specifically to wind energy production in Newfoundland (wind resource production in NL environment conditions) as well as hydroelectric production (forecasting water levels, reservoir management strategies).
In the new revenue model will there be continuation of industrial/biomass production or will the mill primarily be a power producer? Is there any outlook on producing other paper products?	The Project is intended to maintain the mill as a diversified industrial operation rather than transitioning it to primarily a power generation facility. Mill operations will continue, including the use of biomass and wood fibre, with upgrades to facilitate greater volumes of sawmill coproducts, reduce emissions, and integrate renewable energy sources such as wind. The new model supports ongoing paper production while enabling time to investigate and diversify into additional or alternative paper products, depending on market conditions. This integrated approach preserves the mill's role as a key part of the region's cultural and economic identity while also establishing it as a renewable energy and industrial hub for the province.

Table 4.3 Engagement Feedback Received to Date

Comments / Questions Raised	Response / Commitment
Employment and Expenditures	
Regarding employment, improvements in policy and measurables for increased participation for women in all aspects of the project are recommended; importance of diversity and inclusion.	CBPPL is committed to fostering diversity and inclusion and is actively reviewing and updating employment policies to develop measurable objectives for increased participation by women and underrepresented groups in non-traditional roles. Regular reporting will be implemented to track progress and accountability. CBPPL will develop a Gender, Equity, Diversity, and Inclusion Plan (GEDIP) which will identify positions and recruitment planning during each phase, including development, construction, and operation. CBPPL will seek opportunities to work with local organizations and service providers whose mandates support workforce development and equity in resource sectors. CBPPL will also seek opportunities to engage with educational institutions to encourage youth participation in skilled trades, including increasing awareness of and interest in trade careers among women. This may include supporting or participating in programs that promote trades education and career pathways relevant to the forestry sector.
Will CBPPL provide training opportunities?	CBPPL is committed to supporting the training and development of local and Indigenous individuals. CBPPL has played an important role in creating the Centre for Research and Innovation, showing how industry, education, and community can come together. CBPPL's involvement in the Centre connects real industry needs, including the training of current and future workers, to the development of new technologies, and the exploration of sustainable practices. CBPPL will establish agreements and programs in partnership with regional organizations to provide skills training, apprenticeships, and professional development opportunities. These initiatives aim to empower local and Indigenous people to participate fully in CBPPL's workforce, with a commitment to ongoing engagement and collaboration so that training opportunities align with community needs.
What are the business opportunities, including forest harvest contractor and trucking opportunities?	Construction activity will require procurement of materials, equipment, and specialized services, generating economic opportunities for regional suppliers such as fabricators, transport and logistics firms, construction contractors, environmental and engineering consultants, industrial service providers, and local retail and equipment vendors.
Will there be project revenue to GovNL for use of land?	Land use fees will be determined through the province under the <i>Land Use Regulations</i>.
Are there apprenticeship positions for HEOs, Industrial electricians and millwrights?	The Project provides opportunities to advance education in the region. CBPPL will look for opportunities to advance apprenticeship within the construction phase through partnership with local educational institutions.
Would like to understand of our particular trades and the labour requirements forecasted.	Employment positions are detailed in Section 2.4.1, including applicable NOC codes.

Table 4.3 Engagement Feedback Received to Date

Comments / Questions Raised	Response / Commitment
Communities	
What will be the impact on rural communities?	Potential interactions with rural communities have been considered through review of land and resource use, proximity of receptors, and engagement with interested parties. Key factors influencing potential concerns such as visual presence, noise, and shadow flicker have been evaluated through technical studies (Hatch 2026a, b; Appendices E and F). Results of these studies were used to inform Project design, including siting and setbacks. The wind farm is not located near established communities, and ongoing engagement with Indigenous groups, local residents, and other interested parties will continue throughout the Project lifecycle to identify and address concerns as they arise. In addition to reducing potential adverse effects, the Project is expected to provide positive benefits to rural communities through supporting and sustaining employment in the harvesting and sawmill sectors, which are important contributors to local economies and rural livelihoods.
What are the potential accommodation impacts during construction?	Construction of the Wind Farm Site will directly employ 275 workers. While it is anticipated that many of the labour force will be from NL, non-local workers will require housing during the construction phase. Given the temporary and moderate scale of the workforce, the Project is not expected to result in substantial or sustained pressures on regional housing availability or community services. Construction personnel are expected to make use of existing temporary accommodations (e.g., hotels, motels, and short-term rentals) within Corner Brook and surrounding areas, and a proportion of the workforce is anticipated to be sourced locally or regionally. Where feasible, CBPPL will avoid the long-term use of residential housing stock for workforce accommodations and will communicate expectations to contractors to support the use of appropriate, temporary lodging options. Additional information on the potential effects to the socio-economic environment is provided in Section 5.2.6.
What are the potential impacts to affordable housing?	CBPPL recognizes that even temporary workforce influxes can contribute to localized pressures on housing and community services and will maintain ongoing engagement with the City of Corner Brook and relevant interested parties during construction. Should concerns regarding housing availability arise, CBPPL will work with regulators and local community representatives to identify and implement appropriate, proportionate mitigation measures.
What is the impact on the people of Corner Brook and surrounding areas regarding gender/sexual violence and is there a plan to support the community in these areas?	CBPPL acknowledges the importance of maintaining safe and respectful communities. Although the Project is not anticipated to involve a large transient workforce or dedicated accommodations camp, CBPPL will implement standard measures to promote worker conduct and community safety. These measures will include contractor requirements for codes of conduct, worker training and awareness regarding respectful behaviour, and a zero-tolerance approach to harassment and violence. CBPPL will also maintain open communication with local interested parties and service providers and will respond to concerns that may arise during the construction period through the Inquiry/Complaint Resolution Plan. Overall, given the scale and duration of the Project, potential effects on community well-being, including housing and community safety, are anticipated to be limited and will be managed through standard mitigation measures, contractor requirements, and ongoing engagement with local representatives. CBPPL is committed to equity and inclusion employment opportunities. CBPPL is conducting outreach with various groups, including Office to Advance Women Apprentices, WISE, and Equiforce, to better understand barriers to diverse employment. CBPPL will also require workforce gender equity and inclusion policy is included with requests for proposals for construction contractors. As discussed in Section 3.2, CBPPL will develop a GEDIP which will outline CBPPL's commitments, goals, and actions to create a more equitable, diverse, and inclusive environment.

Table 4.3 Engagement Feedback Received to Date

Comments / Questions Raised	Response / Commitment
One of the challenges for NL people is the price of electricity. What are the conditions to maintain affordability of electricity to the province; will there be a commitment to reducing the price of electricity in NL?	The cost of electricity for rate payers in NL is not for CBPPL to decide. However, this Project will provide firm power capacity that is needed for continuing growth of the NL electrical grid.
Education	
Outreach to schools to increase awareness regarding career opportunities is recommended. Interested in potential Renewable Energy Research Hub.	CBPPL will conduct outreach to local schools as part of our community engagement program, including information sessions and provide educational materials to raise awareness about career opportunities within the Project and the broader industry. CBPPL has played an important role in creating the Centre for Research and Innovation, showing how industry, education, and community can come together. CBPPL's involvement in the Centre connects real industry needs, including the training of current and future workers, to the development of new technologies, and the exploration of sustainable practices. CBPPL will establish agreements and programs in partnership with regional organizations to provide skills training, apprenticeships, and professional development opportunities as described in Section 5.2.6.
Land and Resource Use / Wildlife	
Concern over whether outfitters will be treated fairly and whether appropriate mitigation and compensation will be in place if an outfitter's business suffers adverse effects.	CBPPL acknowledges concerns regarding potential effects on outfitting operations and the need for appropriate mitigation measures should adverse effects occur. CBPPL will continue to engage with the NL Outfitters Association and affected outfitters to understand potential concerns related to noise, habitat, environmental effects, and land use. As discussed in Table 3.1, to address these potential effects, CBPPL will develop and implement an Outfitter Environmental Effects Monitoring Plan, in consultation with affected outfitters and relevant organizations (e.g., the Newfoundland and Labrador Outfitters Association), prior to construction.
Will construction in August 2027 impact hunting season?	Construction activities will be coordinated to reduce, when practical, disruption during hunting season. CBPPL will engage with local hunters, trappers, outfitters, and regulators to communicate planned activities and evaluate mitigation measures throughout Project construction. Mitigation measures may include schedule and seasonal timing adjustments.
If there is active trapping in that area will trappers be restricted from access once construction is completed?	CBPPL recognizes that trapping is an important land and resource use activity in the vicinity of the Project and will continue to engage with local trappers throughout Project planning. Through engagement with the NL Trappers Association, CBPPL was advised that there is no electronic registry of trappers; however, the Association committed to sharing Project information with its membership and encouraging trappers active in the area to provide feedback. Following construction, the substation will be fenced for safety and security purposes; however, access to the broader wind farm area is expected to remain generally available, subject to operational and safety requirements.

Table 4.3 Engagement Feedback Received to Date

Comments / Questions Raised	Response / Commitment
Concern regarding increased accessibility to the area with improved roadways.	Access to the Wind Farm Site will be managed to limit increases in public accessibility. Where feasible, existing roads and previously disturbed corridors will be used, with limited upgrades and new road construction undertaken in accordance with established forestry practices and applicable regulatory requirements. Although some increase in access may occur, roads will be maintained primarily for Project-related use and will include appropriate signage and safety controls. A Traffic Impact Study and associated Traffic Management Plan will be developed in consultation with provincial and municipal authorities to manage transportation and access-related effects. Potential interactions with existing land and resource use have been considered in the Project design, and mitigation measures such as controlled access and site restoration following construction will be implemented to reduce changes to land use patterns over the life of the Project.
What will be the impact to the public after the wind farm is completed regarding accessibility to the area? Potential liability questions and issues from potential ice throw from turbines.	Following Project construction, public accessibility to the area will continue to be managed primarily for operational and safety purposes. Access will be controlled through signage and ongoing maintenance to support wind farm operations, with consideration given to existing land use activities. Potential safety risks, including ice throw from WTGs, will be addressed through turbine design and site planning. The selected WTG model is expected to include blade de-icing systems to reduce ice build-up, and industry-standard setbacks, signage, and restricted access where necessary will be implemented to reduce risk and address potential liability considerations over the life of the Project.
Has consideration been given to mitigating for cultural sites, species at risk, foraging etc. What is the plan to address these?	Protection of cultural sites, species at risk, and traditional foraging areas is a priority. Field and desktop studies (Section 4.3) will be conducted, and mitigation measures will be incorporated into environmental management plans (Section 4.2), including buffer zones, timing restrictions, and ongoing consultation with Indigenous and local communities.
Will there be impacts on wetlands, brooks, streams?	Potential effects on wetlands and watercourses have been considered in Project planning and environmental studies. The Project has been designed to use existing roads and previously disturbed areas where feasible, and infrastructure will be sited to avoid or reduce interactions with wetlands and watercourses to the extent practicable. Where interactions cannot be avoided, CBPPL will implement erosion and sediment control measures, maintain applicable setbacks and buffers, and obtain required permits and approvals. Additional mitigation and management measures are described in Section 5.2.

4.5 Planned Engagement Activities

Future engagement will focus on maintaining open, ongoing communication with interested parties throughout the various Project phases. Engagement activities will include targeted outreach to interested parties, and broader public information sharing as the Project advances. Opportunities for input will be provided at key milestones, and engagement methods will be adapted as needed to reflect emerging issues, incorporate feedback, and reflect evolving Project details.

5 Environmental Setting and Potential Resource Conflicts

5.1 Environmental Setting

Although the Project comprises several components located in different areas, the Wind Farm Site is the only area requiring site clearing and preparation activities. As such, the following description of the existing environment is focused on the wind farm location. The following sections provide an overview of the biophysical and human environments near the Wind Farm Site, and surrounding areas. The Wind Farm Site is approximately 12,000 ha in area and on land that is within CBPPL's timber limits within Forest Management District 15. The area has been affected by various forestry related operations over the past two decades, including a well-developed road network and series of cut blocks that are in varying stages of regeneration. As such, much of the area has been previously disturbed and can be considered an industrial forest. The information described in this section is based on publicly available datasets and information and is general to the regional setting but may not fully reflect the current status of the specific Wind Farm Site.

A search of the AC CDC database was conducted to identify plant and wildlife SAR and SOCC that have been recorded within a 15 km radius of the centre point of the Wind Farm Site (AC CDC 2025). The complete AC CDC results and map are provided in Appendix P.

SAR include those species designated as Endangered, Threatened, or Special Concern under Schedule 1 of the federal *Species at Risk Act* (SARA) or designated as Endangered, Threatened, or Vulnerable under the NL *Endangered Species Act* (NL ESA). The protection of SAR and their residences is a legal requirement for those species listed under Schedule 1 of SARA and the NL ESA.

Species of conservation concern are defined herein as those species that do not meet the definition of SAR, but are ranked S1 (Critically Imperiled), S2 (Imperiled), or combinations thereof (e.g., S1S2) on the Island of Newfoundland by the AC CDC (AC CDC 2026); species recommended for listing by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC) as Endangered, Threatened, or Special Concern but not yet listed under SARA; or recommended for listing by the Species Status Advisory Committee as Endangered, Threatened, or Vulnerable but not yet listed under the NL ESA. SOCC also include a few species that do not meet the above-listed definition but are of particular interest to various government agencies (e.g., vegetation species ranked S2S3 by the AC CDC).

5.1.1 Biophysical Environment

5.1.1.1 Atmospheric Environment

5.1.1.1.1 Air Quality

Air quality in NL is regulated by the *Air Pollution Control Regulations, 2022* under the NL *Environmental Protection Act*. The NL Air Quality Standards (NL AQS), prescribed under Schedule A of the *Air Pollution Control Regulations, 2022*, apply to ambient air contaminants and were originally established under NL *Environmental Protection Act* in 2004. The NL AQS values are shown in Table 5.1.

Table 5.1 Newfoundland and Labrador Air Quality Standards

Contaminant	Units	1-hour	3-hour	8-hour	24-hour	1 year
Air Quality Standards (2004)						
Ammonia	parts per billion (ppb)	-	-	-	144	-
Asbestos (greater than 5 microns in length)	fibres per cubic centimetre of air	-	-	-	0.04	-
Arsenic	micrograms per cubic metre (µg/m³)	-	-	-	0.3	-
Cadmium	µg/m³	-	-	-	2	-
Carbon monoxide	ppb	30,582	-	13,107	-	-
Copper	µg/m³	-	-	-	50	-
Hydrogen sulphide	ppb	11	-	-	4	-
Lead	µg/m³	-	-	-	2	-
Mercury	µg/m³	-	-	-	2	-
Nickel	µg/m³	-	-	-	2	-
Nitrogen dioxide	ppb	213	-	-	106	53 ⁽¹⁾
Particulate matter < 2.5 microns	µg/m³	-	-	-	25 ⁽⁴⁾	8.8 ⁽¹⁾⁽⁴⁾
Particulate matter < 10 microns	µg/m³	-	-	-	50	-
Particulate matter (total)	µg/m³	-	-	-	120	60 ^B
Polychlorinated biphenyls	µg/m³	-	-	-	0.15	0.035 ^A
Polychlorinated dibenzo -p-dioxins & polychlorinated dibenzo furans (I-TEQ)	picograms (I-TEQ) per cubic metre of air	-	-	-	5 ^C	-
Sulphur dioxide	ppb	344	229	-	115	23 ^A
Vanadium	µg/m³	-	-	-	2	-
Zinc	µg/m³	-	-	-	120	-
Air Quality Standards for Air Zone Management						
Nitrogen dioxide (effective until December 31, 2024)	ppb	60 ^E	-	-	-	17 ^A
Nitrogen dioxide (Effective January 1, 2025)	ppb	42 ^E	-	-	-	12 ^A
Ozone	ppb	82	-	44	-	-
Particulate matter < 2.5 microns	µg/m³	-	-	-	25 ^D	8.8 ^{A, D}

Table 5.1 Newfoundland and Labrador Air Quality Standards

Contaminant	Units	1-hour	3-hour	8-hour	24-hour	1 year
Sulphur dioxide (effective until December 31, 2024)	ppb	70 ^F	-	-	-	5 ^A
Sulphur dioxide (Effective January 1, 2025)	ppb	65 ^F	-	-	-	4 ^A

Notes:

- ^A The arithmetic average over a single calendar year of all 1-hour average concentrations in the year.
^B The geometric average over a single calendar year of all 1-hour average concentrations in the year.
^C Under the Regulation, the International Total Equivalent Quotient (I-TEQ) concentration of polychlorinated dibenzodioxins and polychlorinated dibenzofurans is determined by multiplying the concentration of each congener listed in Column 1 of Table III by the corresponding toxicity factor set out in Column 2 of that item and by adding the products of them.
^D At reference conditions, a dry gas temperature of 25°C and a gas pressure of 101.325 kilopascals
^E The 3-year average of the annual 98th percentile of the NO₂ daily maximum 1 hour average concentrations.
^F The 3-year average of the annual 99th percentile of the SO₂ daily maximum 1 hour average concentrations.

Source: NL Air Pollution Control Regulations, 2022

The applicable federal air quality criteria considered in the assessment are the Canadian Ambient Air Quality Standards (CAAQS). The CAAQS were established by the Canadian Council of Ministers of the Environment (CCME 2024, Table 5.2).

Table 5.2 Canadian Ambient Air Quality Standards

Air Contaminant	Averaging Period	µg/m ³	
		2020–2024	2025+
Ozone (O ₃)	8-hour ^A	122	118
Nitrogen Dioxide (NO ₂)	1-hour ^B	113	79
	1-year ^C	32	23
Sulphur Dioxide (SO ₂)	1-hour ^D	183	170
	1-year ^E	13	10
Fine Particulate Matter (PM _{2.5})	24-hour ^F	27	-
	1-year ^G	8.8	-

Notes:

- ^A The 3-year average of the annual 4th highest of the daily maximum 8-hour average ozone concentrations
^B The 3-year average of the annual 98th percentile of the daily maximum 1-hour average concentrations
^C The average over a single calendar year of all 1-hour average concentrations
^D The 3-year average of the annual 99th percentile of the SO₂ daily maximum 1-hour average concentrations
^E The average over a single calendar year of all 1-hour average SO₂ concentrations
^F The 3-year average of the annual 98th percentile of the daily 24-hour average concentrations
^G The 3-year average of the annual average of the daily 24-hour average concentrations

Source: CCME (2024)

As described in the most recently published air quality report for NL, air quality in communities across the province is generally considered to be good as the NL AQS are rarely exceeded for the contaminants being measured. On occasion, communities close to industrial operations may experience episodic decreases in air quality; however, these episodes tend to be brief in nature and are rarely at levels that exceed the air quality standards. Elevated levels of air contaminants can also occur due to long-range

transport from mainland Canada, the United States, and Europe and infrequently produce levels that exceed the NL AQS. On the local level, emissions from sources such as vehicular traffic, forest fires, and woodstoves also impact the provincial air quality (NLDECC 2025b).

There are two monitoring stations in Corner Brook, one operated by ECCC and one operated by CBPPL (in compliance with CBPPL's CofA). The ECCC air quality monitoring station is located on MacPherson Avenue near Confederation Drive and monitors the levels of SO₂, NO₂, CO, O₃, PM_{2.5}, and PM₁₀ on a continuous basis. There was one exceedance of the ozone air quality standard but no other exceedances for these contaminants in 2024. During 2023, there were 17 exceedances of PM₁₀, all during March.

The CBPPL station is located at Hotel Corner Brook. The station monitors levels of SO₂, PM_{2.5}, PM₁₀, and TPM on a continuous basis. There were no recorded exceedances of the SO₂, TPM, PM₁₀, or PM_{2.5} air quality standards in 2023. However, in March 2024 there were 16 exceedances of the 24-hour air quality standard for PM_{2.5}, 33 exceedances of the 24-hour air quality standard for PM₁₀, and 32 exceedances of the 24-hour air quality standard for TPM, all in March (NLDECC 2025b).

Based on the measured data, air quality is generally good in the Corner Brook area with infrequent particulate matter exceedances. For the last two years, particulate exceedances only occurred during one month of each year indicating a temporary elevated source was likely the cause.

5.1.1.1.2 Greenhouse Gases

The NL government requires industrial facilities to report GHG emissions under the NL *Management of Greenhouse Gas Act* (MGGA) and its regulations if the facility releases 15,000 tonnes (t) of carbon dioxide equivalent (CO₂e) or more per year from onsite GHG emissions sources during operation. Onsite GHG emissions refer to those generated by sources or activities that are controlled/owned by a reporting entity or project at the site and does not include on-road vehicles (NLDECC 2017).

If a facility is expected to emit 15,000 t CO₂e or more per year from onsite GHG emissions sources during operation, it is subject to best available control technology (BACT) requirements outlined in the *Management of Greenhouse Gas Regulations* (MGGR). The Mill, as required by the CofA, reports annual GHG emissions to both the provincial and federal government (as a large emitter provincially, regulated under the MGGR) however the Project is expected to decrease these emissions such that they can opt out of this program. Future CofAs will define monitoring and reporting requirements at the Mill Site.

The MGGR states that targets established pursuant to section 5 of the MGGA do not apply to a facility during its construction and pre-production stages.

Newfoundland's total GHG emissions for 2024 were 8,620 kilotonne (kt) CO₂e, excluding land use and land use change. The Province of NL has committed to reducing GHG emissions and supporting the transition to a low carbon economy in NL with the following reduction targets:

- 30% reduction in provincial GHG emissions below 2005 levels by 2030 (Government of NL 2019)
- Net-zero emissions by 2050 (Government of NL 2023; Government of Canada 2024)

Federally, industrial facilities that emit 10,000 t CO₂e or more per year (during operation) are required to report GHG emissions to the ECCC Greenhouse Gas Reporting Program. The federal government recently developed an Emissions Reduction Plan under the *Canadian Net-Zero Emissions Accountability Act*, which aims to reduce emissions across Canada by 40–45% below 2005 levels by 2030 (Government of Canada 2023). The federal government has committed to achieving net-zero emissions by 2050 (Government of Canada 2024).

5.1.1.1.3 Sound Quality

The area around the Wind Farm Site is considered rural, without notable permanent sound emissions sources. Typical sounds in this setting include bird calls, wind through vegetation, and occasional motor vehicle use. Because the area is in a rural setting, guidance from Health Canada (2017) was used to estimate the existing sound level in lieu of monitoring. The average day-night sound level for a rural setting suggested by Health Canada is 35 dBA. This level is quieter than normal conversational sound levels at 50 dBA.

5.1.1.2 Climate and Physical Environment

The Wind Farm Site (shown in Figure 1.1) falls within the Corner Brook Subregion of the Western Newfoundland Forest Ecoregion. This subregion is one of six in the Ecoregion that extends along the western coast of the province from Bonne Bay in the north to Codroy Valley in the south (PAANL 2008; Government of NL 2017a). This ecoregion extends inland and includes the majority of the Long-Range Mountains (PAANL 2008).

The Corner Brook Subregion is characterized by forested, rolling hills and a mix of shale and limestone geology (PAANL 2008; Kruger Industrial 2024). The topography of the area is generally rugged, however there are flat, high upland plateaus and wide valleys and the landscape is intersected by ponds, lakes, streams, and wetlands (Kruger Industrial 2024). The City of Corner Brook is located at the end of Humber Arm, a 35 km long fjord connected to the Bay of Islands in Gulf of St. Lawrence (Corner Brook Port n.d.[a]).

The climate in the Corner Brook Subregion is characterized by cold winters and warm summers, high humidity, and long growing seasons relative to the rest of the Island (PAANL 2008; Kruger Industrial 2024). The mean temperatures in the subregion are -10 °C in January, and 13-16°C in July, with annual precipitation totaling between 1,020 and 1,400 millimetres (mm) (PAANL 2008; Kruger Industrial 2018).

Climate change projections for the Deer Lake region (the nearest regional site to the Project) indicate a trend toward warmer and wetter conditions, as well as increased climate variability. Available provincial climate data indicate that future conditions in NL are expected to include increases in total precipitation and an increase in the frequency and intensity of extreme precipitation events (Government of Newfoundland and Labrador 2025a, 2025b). Climate data resources specific to Deer Lake include projections of extreme rainfall characteristics, such as intensity-duration-frequency curves, which identify the intensity of rainfall events (in millimeters per hour) over a specific duration (ranging from five minutes to 24 hours) and how frequent these rain events are expected to occur (ranging from a one-in-two to a one-in-100 year event) (Government of Newfoundland and Labrador 2025a). These projections are consistent with broader provincial trends indicating a shift toward more frequent heavy precipitation events and an associated increase in the likelihood of flooding and hydrologic variability (Government of Newfoundland and Labrador 2025b).

5.1.1.3 Water Resources

The Wind Farm Site (Figure 5.1) is adjacent to a number of large lakes including Corner Brook Lake, Pinchgut Lake, and Grand Lake which is the largest lake on the Island of Newfoundland. The shoreline of Grand Lake was buffered by approximately 2 km to form the southern and eastern the Wind Farm Site boundaries. There are number of smaller lakes and streams across the Wind Farm Site that will be considered in the overall design and mitigation measures and permitting requirements.

There are three major watersheds that drain the Wind Farm Site: St. Lewis Hills, Humber Valley, and Grand Lake (Figure 5.1). The St. Lewis Hills watershed flows west towards St. George's Bay and Port au Port Bay, the Humber Valley watershed flows north towards Bay of Islands, and the Grand Lake watershed flows northeast and drains into Deer Lake which flows into the Humber Valley Watershed within the Atlantic Ocean.

The following wind farm components are in Humber Valley Watershed, Corner Brook Lake sub-watershed:

- Proposed transmission line
- Lady Slipper Road - access road option

The following wind farm components are located in the St. Lewis Hills, Georges Lake sub-watershed:

- Proposed transmission line

The following wind farm components are located in the Grand Lake, northern Grand Lake sub-watershed:

- proposed transmission line
- Wind farm

As shown in Figure 2.5, the site access road (Lady Slipper Road), the transmission line, and connecting roads between the WTGs cross several streams and waterbodies. Table 5.3 provides a summary of the crossings from 1:50,000 topographic map as well as a review of data from FAL - Land Cover Streams and Waterbodies and available aerial imagery. A detailed inventory of streams and waterbodies within the study area is provided in Appendix Q. Following final design and site layout, and prior to construction, watercourse crossings will be field-verified and sensitive habitats identified and mapped that could be directly or indirectly affected by the wind farm.

Table 5.3 Summary of Watercourse Crossings

Project Component	Location	1:50,000	FAL - Land Cover Streams and Waterbodies and Available Aerial Imagery
Site Access Road	Lady Slipper	3	30
Windfarm	New Collector Road	2	18
	Existing Collector Road Requires Upgrade	5	23
Transmission Line	Windfarm substation to TCH	12	22
	Along TCH	8	25
Total		30	118

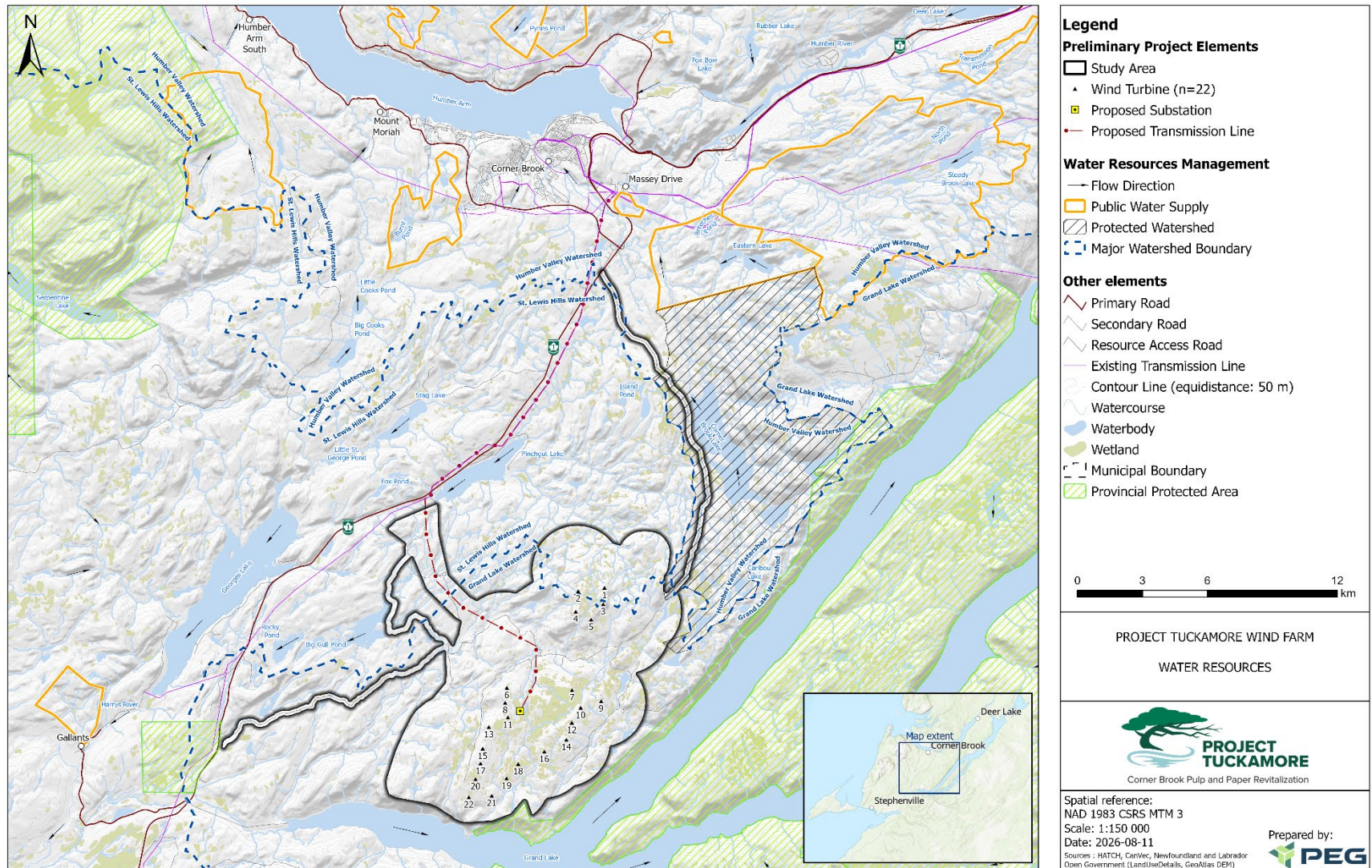


Figure 5.1 Watersheds Near the Wind Farm Site

5.1.1.4 Wetlands, Vegetation, and Rare Flora

Wetlands enhance freshwater quality and store nutrients, provide flood and erosion control, and often contain rare plant species (Barbier et al. 1997). The Corner Brook Subregion is home to two types of alder swamps that do not exist in other parts of NL: golden rod/alder and bracken fern/alder swamps. Both types of swamps are found in areas with poorly drained soil, resulting in high nutrients in the wetlands (PAANL 2008).

The forests in the Corner Brook Subregion are dominated by ferns and balsam fir (*Abies balsamea*). Black spruce (*Picea mariana*) occurs in poorly drained locations, and in areas with exposed bedrock. Yellow birch (*Betula alleghaniensis*), white pine (*Pinus strobus*), red maple (*Acer rubrum*), and trembling aspen (*Populus tremuloides*) reach their northern limit in the Western Newfoundland Forest Ecoregion (PAANL 2008).

The Government of NL publishes SAR information and recovery plans on their website (Government of NL 2025a). Amongst the list of plant SAR, there are two species near Corner Brook, but outside of the Wind Farm Site, that are Endangered: crowded wormseed mustard (*Erysimum inconspicuum var coarctatum*), a herbaceous biennial perennial, and low northern rockcress (*Braya humilis*), a limestone barrens endemic species. Crowded wormseed mustard only exists between the Bay of Islands and Gros Morne National Park (Hanel and Burzynski 2009). The low northern rockcress has one population location in NL, on Table Mountain in Gros Morne (Tilley et al. 2005).

Two vegetation SAR were identified by the AC CDC search, a 15 km radius from a wind farm centre point: black ash (*Fraxinus nigra*) and tradescant's aster (*Symphyotrichum tradescantii*) (AC CDC 2025). These records do not occur within the Wind Farm Site footprint. Three SOCC were identified by the AC CDC search: slender-leaved sundew (*Drosera linearis*), slender spike-rush (*Eleocharis nitida*), and Dudley's rush (*Juncus dudleyi*) (AC CDC 2025). Vegetation species noted in the AC CDC search are provided in Table 5.4.

Table 5.4 Vascular Plants AC CDC Observations Within 15 km of the Wind Farm Site

Common Name	Scientific Name	SARA Status	COSEWIC Status	NL ESA Status	AC CDC S Rank ^A
Slender-Leaved Sundew	<i>Drosera linearis</i>	-	-	-	S2
Slender Spike-Rush	<i>Eleocharis nitida</i>	-	-	-	S1
Black Ash	<i>Fraxinus nigra</i>	Under consideration for addition	Threatened	Threatened	S2S3
Dudley's Rush	<i>Juncus dudleyi</i>	-	-	-	S2
Tradescant's Aster	<i>Symphyotrichum tradescantii</i>	-	-	Threatened	S1

Notes:

^A S1 = critically imperiled; S2 = imperiled; S3 = vulnerable; S#S# = range of uncertainty about the status

Source: AC CDC (2025, 2026)

5.1.1.5 Aquatic Environment

The Corner Brook subregion supports a variety of fish species, including Atlantic salmon (*Salmo salar*), brook trout (*Salvelinus fontinalis*), Arctic char (*Salvelinus alpinus*), ninespine stickleback (*Pungitius pungitius*), threespine stickleback (*Gasterosteus aculeatus*), black-spotted stickleback (*Gasterosteus wheatlandi*), rainbow smelt (*Osmerus mordax*) (Scott and Crossman 1998; PAANL 2008).

Several fish SAR are also present in the Corner Brook subregion (PAANL 2008). The American eel (*Anguilla rostrata*) is a migratory species that occupies both freshwater and marine environments over the course of its life cycle. In freshwater environments, it can typically be found in lakes and rivers and is more abundant in medium and large rivers close to the ocean (Smith and Saunders 1955; Gray and Andrews 1971). This species has been assessed by COSEWIC as Threatened and is listed as Vulnerable under NL ESA. Mummichog (*Fundulus heteroclitus*) are also present within the subregion and are typically associated with brackish environments, including salt marshes, estuaries, and tidal areas where submerged aquatic vegetation is present (Scott and Crossman 1998). This species is currently listed as Vulnerable under NL ESA. As the wind farm and its associated infrastructure interacts with freshwater streams, mummichog are not anticipated to be affected. Banded killifish (*Fundulus diaphanus*) is a small-bodied freshwater fish with a scattered distribution on the Island of Newfoundland. Known populations are primarily concentrated along the southwest coast, including Grand Bay West, Loch Leven, St. George's Bay, the Bay of Islands, and Cow Head (COSEWIC 2014). One confirmed occurrence of banded killifish was documented near the transmission line corridor at Pinchgut Lake in 2013 based on AC CDC search results and as a result has the potential to occur within the Wind Farm Site (AC CDC 2025, Table 5.5). This species has been assessed by COSEWIC as Special Concern and is listed as Special Concern under SARA and Vulnerable under NL ESA.

Table 5.5 provides the aquatic species identified in the AC CDC search. Note that American eel also has potential, albeit low, to occur within the Wind Farm Site.

Table 5.5 Fish AC CDC Observations Within 15 km of the Wind Farm Site

Common Name	Scientific Name	SARA Status	COSEWIC Status	NL ESA Status	AC CDC S Rank ^A
Banded Killifish (Newfoundland population)	<i>Fundulus diaphanus</i>	Special Concern	Special Concern	Vulnerable	S3

Note:

^A S3 = vulnerable

Source: AC CDC (2025, 2026)

5.1.1.6 Birds

The forests in the Corner Brook subregion support finches (e.g., purple finch [*Carpodacus purpureus*] and pine siskin [*Spinus pinus*]), warblers (e.g., black-and-white warbler [*Mniotilta varia*], magnolia warbler [*Setophaga magnolia*], American restart [*Setophaga ruticilla*], and Tennessee warbler [*Leiothlypis peregrina*]) sparrows (e.g., song sparrow [*Melospiza melodia*], fox sparrow [*Passerella iliaca*], and Lincoln's sparrow [*Melospiza lincolni*] (PAANL 2008; NBBA 2026), and upland game birds (e.g., ruffed grouse [*Bonasa umbellus*]). Yellow-bellied flycatcher (*Empidonax flaviventris*), tree swallow (*Tachycineta bicolor*), blue-headed vireo (*Vireo solitarius*), and thrushes (e.g., Swainson's thrush [*Catharus ustulatus*])

also occur in the subregion (PAANL 2008; NBBA 2026). Aquatic birds in the subregion include green-winged teal (*Anas crecca*), black duck (*Anas rubripes*), northern pintail (*Anas acuta*), red-breasted merganser (*Mergus serrator*), spotted sandpiper (*Actitis macularius*), common tern (*Sterna hirundo*), and belted kingfisher (*Megasceryle alcyon*) (PAANL 2008). Raptors noted in the area include bald eagle (*Haliaeetus leucocephalus*) and osprey (*Pandion haliaetus*).

There are several avian SAR that may occur in the Corner Brook subregion, including four SAR that were identified in the AC CDC search: olive-sided flycatcher (*Contopus cooperi*), rusty blackbird (*Euphagus carolinus*), red crossbill (*Loxia curvirostra perchna*), and gray-cheeked thrush (*Catharus minimus minimus*) (AC CDC 2025). Avian species noted in the AC CDC search, and their statuses, are summarized in Table 5.6.

Table 5.6 Bird AC CDC Observations Within 15 km of the Wind Farm Site

Common Name	Scientific Name	SARA Status	COSEWIC Status	NL ESA Status	AC CDC S Rank ^A
Olive-sided Flycatcher	<i>Contopus cooperi</i>	Special Concern	Special Concern	Vulnerable	S3B,SUM
Rusty Blackbird	<i>Euphagus carolinus</i>	Special Concern	Special Concern	Vulnerable	S2S3B,SUM
Red Crossbill	<i>Loxia curvirostra perchna</i>	Threatened	Threatened	Threatened	S1S2
Gray-cheeked Thrush	<i>Catharus minimus minimus</i>	Under consideration for addition	Threatened	Threatened	S2B,SUM

Notes:

^A S1 = critically imperiled; S2 = imperiled; S3 = vulnerable; S#S# = range of uncertainty about the status; SU = unrankable
B = breeding; M = migrant

Source: AC CDC (2025, 2026)

5.1.1.7 Bats

Five species of bats that have been documented in western Newfoundland, including two hibernating species—little brown myotis (*Myotis lucifugus*) and northern myotis (*Myotis septentrionalis*)—and three migratory species: hoary bat (*Lasiurus cinereus*), eastern red bat (*Lasiurus borealis*), and silver-haired bat (*Lasionycteris noctivagans*) (McBurney and Segers 2021; Humber, personal communication, December 16, 2022. comm; unpublished data).

Little brown myotis and northern myotis are year-round residents that overwinter (hibernate) in underground sites such as caves and abandoned mines and form maternity colonies during the summer (ECCC 2018). Little brown myotis form colonies in both anthropogenic (e.g., buildings) and natural (e.g., tree cavities and crevices) structures, while northern myotis typically roost singly or in small groups and favor natural structures, such as cavities in large diameter trees (ECCC 2018).

Hoary bat, eastern red bat, and silver-haired bat may occur in the Corner Brook subregion during spring and fall migration, as well as during the summer roosting period. During summer, hoary bats and eastern red bats typically roost singly or with their young among the foliage of trees, whereas silver-haired bats primarily roost beneath bark or in the cavities of large diameter trees, often in small groups (COSEWIC 2023). Relatively little is known about their migration and hibernation (COSWEIC 2023).

Two bat SAR were identified in the AC CDC search: little brown myotis and northern myotis. Preliminary areas of critical habitat have been designated for little brown myotis and northern myotis (ECCC 2018); which currently includes only hibernacula. There are no known hibernacula in the Wind Farm Site or indicated in the AC CDC search (AC CDC 2025). However, it is possible that hibernacula exist in the Corner Brook subregion. Bat species that may occur in the vicinity of the Wind Farm Site, including species identified during the AC CDC search, are listed in Table 5.7 along with their provincial and federal conservation status designations.

Table 5.7 Bat Species That May Occur in the Vicinity of the Wind Farm Site

Common Name	Scientific Name	SARA Status	COSEWIC Status	NL ESA Status	AC CDC S Rank ^A
Little Brown Myotis ^B	<i>Myotis lucifugus</i>	Endangered	Endangered	Endangered	S1S3
Northern Myotis ^B	<i>Myotis septentrionalis</i>	Endangered	Endangered	Endangered	S1S3
Hoary Bat	<i>Lasiurus cinereus</i>	Under consideration for addition	Endangered	Endangered	SUM
Eastern Red Bat	<i>Lasiurus borealis</i>	Under consideration for addition	Endangered	Endangered	SNA
Silver-haired Bat	<i>Lasionycteris noctivagans</i>	Under consideration for addition	Endangered	Endangered	SNR

Notes:

^A S1 = critically imperiled; S3 = vulnerable; S#S# = range of uncertainty about the status; SU = unrankable; M = migrant; SNA = not applicable; SNR = unranked

^B Identified in the AC CDC search

Source: AC CDC (2025, 2026)

5.1.1.8 Other Wildlife

The subregion provides habitat for a wide range of wildlife, including moose (*Alces alces*), caribou, mink (*Mustela vison*), snowshoe hare (*Lepus americanus*), lynx (*Lynx canadensis*), black bear (*Ursus americanus*), red fox (*Vulpes vulpes*), beaver (*Castor canadensis*), muskrat (*Ondatra zibethicus*), American marten (Newfoundland population), otter (*Lontra canadensis*), eastern chipmunk (*Tamias striatus*), masked shrew (*Sorex cinereus*), meadow vole (*Microtus pennsylvanicus*), and red squirrel (*Tamiasciurus hudsonicus*) (PAANL 2008).

One other wildlife SAR was identified in the AC CDC search, Newfoundland marten. One SAR insect, the yellow-banded bumble bee (*Bombus terricola*), was also identified (AC CDC 2025). Other wildlife species that may occur in the vicinity of the Wind Farm Site, including species identified during the AC CDC search, are listed in Table 5.8 along with their provincial and federal conservation status designations.

Table 5.8 Other Wildlife That May Occur in the Vicinity of the Wind Farm Site

Common Name	Scientific Name	SARA Status	COSEWIC Status	NL ESA Status	AC CDC S Rank ^A
Mammals					
American Marten, or Newfoundland Marten ^B	<i>Martes americana atrata</i>	Special Concern	Special Concern	Vulnerable	S3S4
Insects					
Yellow-banded Bumble Bee ^B	<i>Bombus terricola</i>	Special Concern	Special Concern	Vulnerable	S3S4
Suckley's Cuckoo Bumble Bee	<i>Bombus suckleyi</i>	Under consideration for addition	Threatened	Threatened	S2?
Gypsy Cuckoo Bumble Bee	<i>Bombus bohemicus</i>	Endangered	Endangered	Endangered	S1?
Transverse Lady Beetle	<i>Coccinella transversoguttata</i>	Special Concern	Special Concern	Vulnerable	SU

Notes:

^A S1 = critically imperiled; S2 = critically imperiled; S3 = vulnerable; S4 = apparently secure; S#S# = range of uncertainty about the status; S#? = inexact or uncertain rank; SU = unrankable

^B Identified in the AC CDC search Source: AC CDC (2025, 2026)

Critical habitat of Newfoundland marten adopted in the 2013 federal recovery strategy (Environment Canada 2013) overlaps with a portion of the Wind Farm Site (Figure 5.2); approximately 5,828 ha of identified critical habitat occurs within the site. Under SARA, critical habitat is the habitat that is necessary for the survival or recovery of listed Extirpated, Endangered, or Threatened species, and that is identified as such in a recovery strategy or action plan. However, the conservation status of Newfoundland marten has recently been downlisted (from Threatened) under both provincial and federal legislation, in 2024 and 2026, respectively (NLDDFA 2024; Canada Gazette 2026). The downlisting to Special Concern under SARA means that the prohibitions under sections 32 and 33, as well as recovery planning requirements, no longer apply, and a management plan that includes measures for the conservation of the species is currently pending (Canada Gazette 2026).

Caribou (Newfoundland population) (*Rangifer tarandus*), also listed as Special Concern under SARA, are not expected to regularly occur within the Wind Farm Site based on Caribou Management Area boundaries (NLDDFA 2025) and the absence of AC CDC records of caribou within a 15 km radius of the site (AC CDC 2025). However, occasional individuals may occur, given the Project's proximity to identified caribou habitat (Figure 5.2). This includes "caribou core areas", which are designated zones of concentrated caribou use delineated by the Wildlife Division based on spatial distribution data (Emera 2013). The closest caribou core area is on the far side of Grand Lake approximately 3 km southwest of the Wind Farm Site and there is another small core area north of Corner Brook Lake that is approximately 4 km from Lady Slipper Road and 12 km from the Wind Farm Site (NLDFAL n.d.). There is also a sensitive caribou wildlife area located within the Corner Brook Subregion, approximately 16 km northwest of the Project's transmission line corridor. Overall, available information suggests that caribou occur in the broader region, but regular use of the Wind Farm Site can not be determined from publicly available data.

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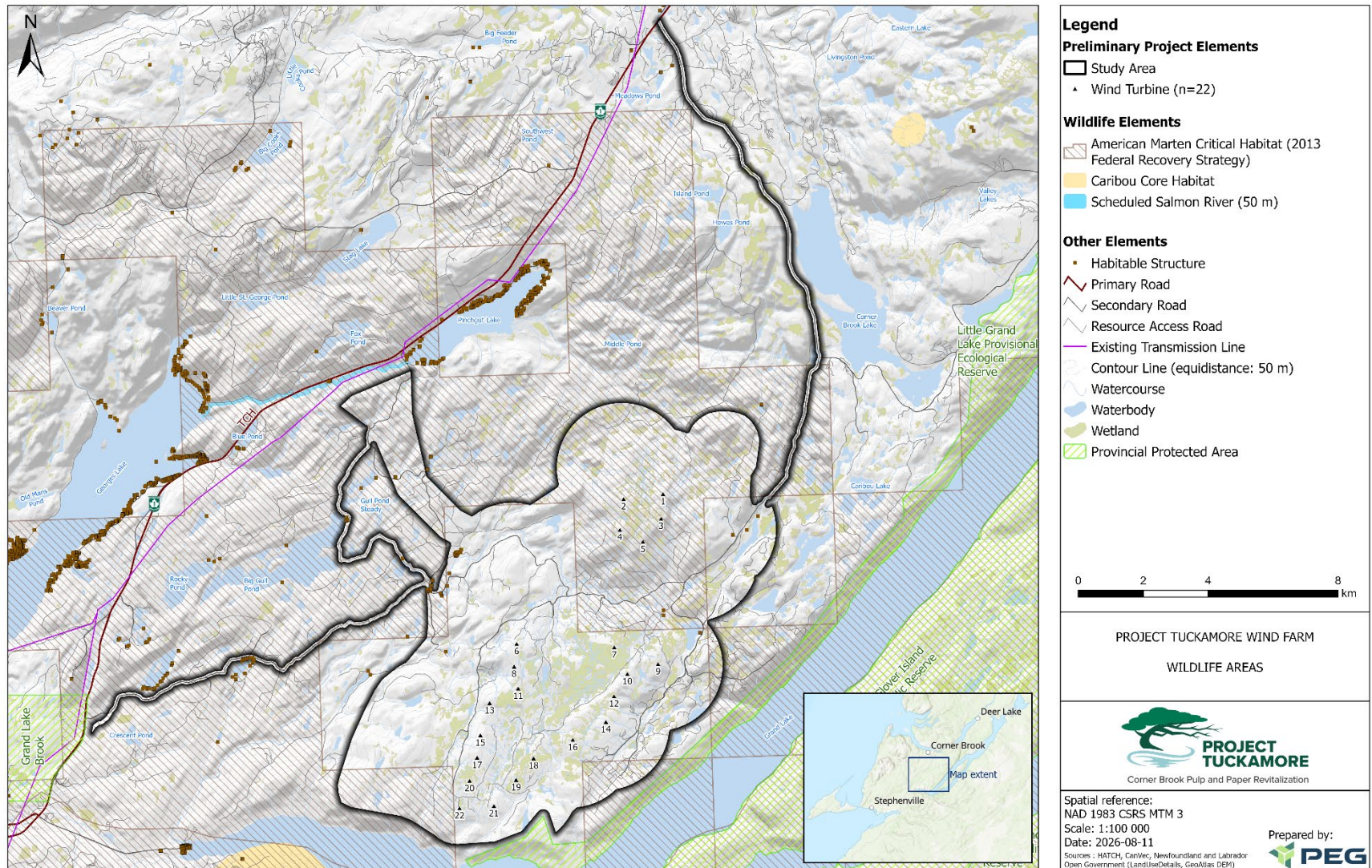


Figure 5.2 Wildlife Areas Near the Wind Farm Site

5.1.2 Human Environment

5.1.2.1 Municipalities

The Wind Farm Site is situated in a rural region of western Newfoundland, approximately 15 km southeast of Corner Brook, the largest community in the area (Figure 5.3). Surrounding municipalities include Massey Drive, located on the outskirts of Corner Brook, and Deer Lake, which lies 51 km to the east. The broader local area also encompasses Statistics Canada Census Division Number 4, Subdivision D, to the southwest, which includes smaller communities such as Georges Pond and Pinchgut Lake. To the east, Towns of Steady Brook and Pasadena are also included. In 2021, the total population of the region was 27,176, reflecting a 3.4% decrease since 2016. Of this population, approximately 27.4% identified as Indigenous, a proportion notably higher than the provincial average, and women+⁴ accounted for just over half of the regional population. Population estimates for the region from 2016 to 2021 are provided in Table 5.9.

⁴ Women + refers to women (and/or girls), as well as some non-binary persons.

Project Tuckamore Environmental Assessment Registration
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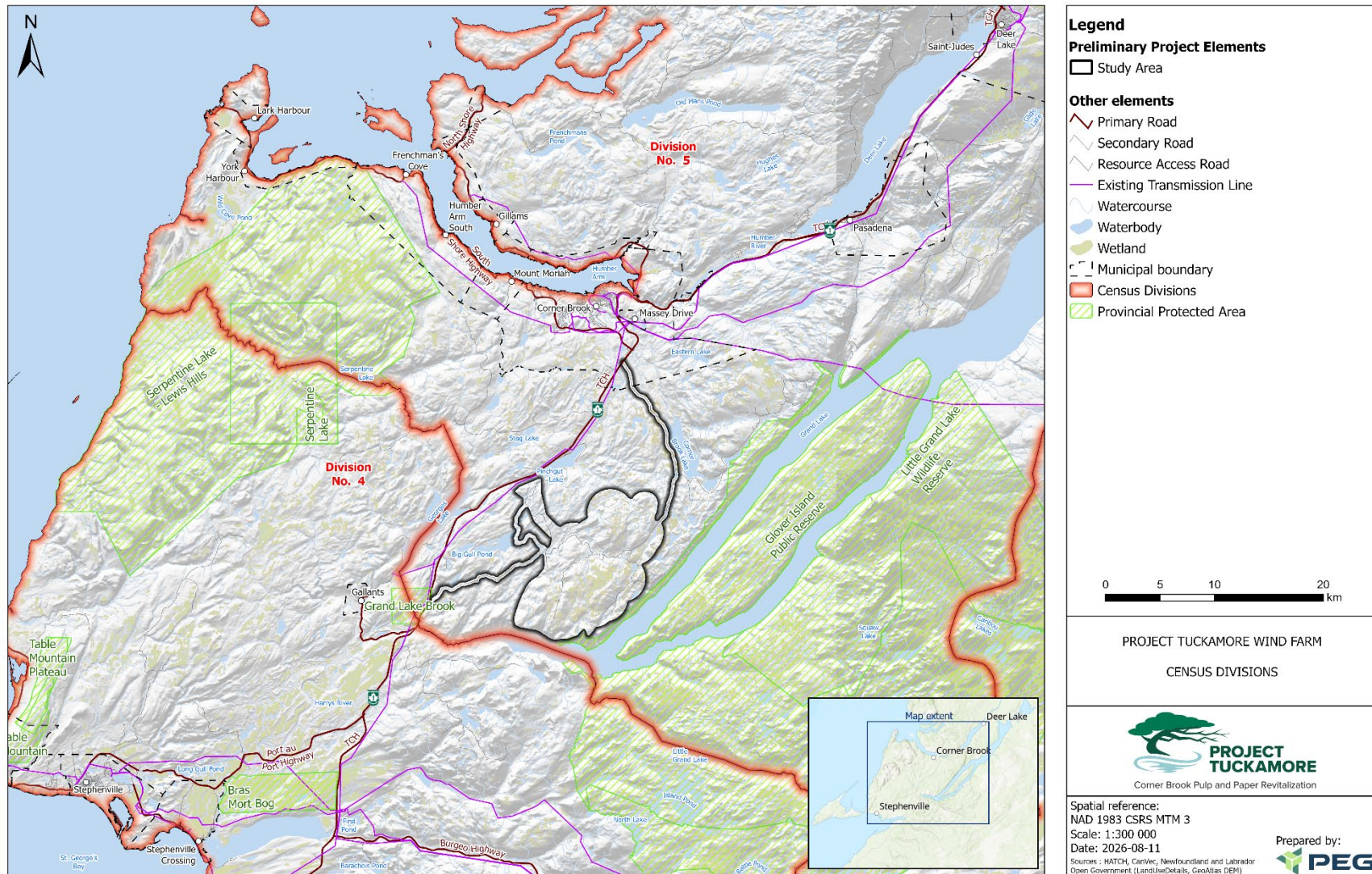


Figure 5.3 NL Census Divisions and Communities Near the Project

Table 5.9 Population – 2016 to 2021

Location	Total	Men+ ¹	Women+ ²	% Change (Total)	% Change (Men+ ^A)	% Change (Women+ ^B)
Total Population						
Corner Brook	19,333	9,255	10,080	-2.4%	-1.8%	-2.9%
Massey Drive	1,606	790	815	-1.6%	-2.8%	-0.6%
Deer Lake	4,864	2,340	2,525	-7.3%	-8.3%	-6.5%
Steady Brook	416	200	220	-6.3%	-5.7%	-6.3%
Pasadena	3,524	1,720	1,800	-2.7%	-2.8%	-2.5%
Census Subdivision 4D	1,212	625	590	29%	29%	29%
Region Total	27,178	13,270	14,015	-3.4%	-4.1%	-2.6%
Newfoundland and Labrador	510,550	250,075	260,475	-1.8%	-1.5%	-2.0%
Indigenous Population^C						
Corner Brook	4,620	2,125	2,495	-0.2%	-10.6%	9.1%
Massey Drive	435	180	260	8.3%	-5.5%	6.5%
Deer Lake	680	340	340	-1.5%	8.8%	-5.5%
Steady Brook	90	45	45	22.8%	24.3%	22.0%
Pasadena	695	335	365	19.7%	19.3%	20.4%
Census Subdivision 4D	625	315	310	48%	46%	50%
Total Indigenous	7,145	3,340	3,815	1.3%	-7.0%	9.4%
Newfoundland and Labrador	46,545	22,520	24,030	1.8%	1.9%	1.7%

Notes:

^A. This category includes men (and/or boys), as well as some non-binary persons.

^B. This category includes women (and/or girls), as well as some non-binary persons.

^C. This category includes persons who identify as First Nations (North American Indian), Métis and/or Inuk (Inuit) and/or those who report being Registered or Treaty Indians (that is, registered under the *Indian Act* of Canada), and/or those who report having membership in a First Nation or Indian band.

2021 'Total Population' and 'Indigenous Population' data from 2021 Census of the Population – Census Profile.

Values shown in "Total" columns are the sum of male and female Census Subdivision (CSD) subsets taken from Statistics Canada's 2021 Census Profile (Census of the Population). Due to Statistics Canada rounding (Statistics Canada 2023) totals may not exactly align with those shown on CSD Census Profiles and may not sum across tables.

Source: Statistics Canada (2017, 2023)

5.1.2.2 Education

The communities near the Project are within the NL Schools western region, which accounts for 62 of the 255 provincial schools and 16.2% (10,326) of the 63,909 total provincial enrolments for 2021-22 (NLDEECD 2026). Student enrolment within the western region of NL Schools is in decline; enrolment among FTE Pupils decreased 1.7% between 2024-25 and 2025-26 (NLDEECD 2026). There are also three post-secondary institutions in Corner Brook, the Grenfell Campus of Memorial University, College of the North Atlantic, and Academy Canada, which collectively serve over 2,700 students with the Grenfell Campus being the largest and offering a range of degree programs (Upland 2021).

5.1.2.3 Labour Force

In 2021, the labour force consisted of 8,915 individuals in Corner Brook, 980 individuals in Massey Drive, 1,970 individuals in Deer Lake, 1,645 individuals in Pasadena, 195 individuals in Steady Brook, and 465 individuals in Census Subdivision 4D (Statistics Canada 2023). Labour force participation rates in 2021 were notably lower in Deer Lake (47.8%) and high in Massey Drive (74.2%) (Statistics Canada 2023). Differences in participation rates between men+ and women+ indicated that men+ generally had higher participation across, with the exception of Deer Lake, where the pattern was reversed.

5.1.2.4 Housing

Between 2016 and 2021, Corner Brook saw a slight increase in occupied dwellings, rising from 8,764 to 8,868, with average rent reaching \$850 and average home price at \$243,400 in 2021 (Statistics Canada 2023). New housing developments, such as Discovery Ridge, are underway, and investments in water and wastewater infrastructure are expected to support further residential growth (Kennedy 2026). The apartment vacancy rate in Corner Brook decreased from 3.7% in 2019 to 1.4% in 2021, before rising to 1.7% in 2022, while average rent grew from \$733 to \$806 per month (CMHC 2023). In 2021, Deer Lake's occupied dwellings declined to 2,139, with average rent of \$800 and home values at \$238,200, whereas Massey Drive had 626 occupied dwellings, a higher average rent of \$1,080, and average home values of \$317,000 (Statistics Canada 2023). With respect to temporary accommodations, there are 48 hotels, inns, and vacation rentals in Corner Brook, Deer Lake, and the nearby communities. Corner Brook has approximately 70 Airbnb rentals and Deer Lake has more than 50 (Airbnb 2026). There are also seven campgrounds and recreational vehicle parks available (Newfoundland and Labrador Tourism 2026). Occupancy rates for the Western region of NL for temporary accommodations, such as hotels and motels, was 50.47% in 2025, up 3% from 2024 when it was 47.51% (NLDCTAR 2025).

5.1.2.5 Utilities

The City of Corner Brook supplies water to the communities of Corner Brook, Massey Drive, and Mount Moriah (Upland 2021) from the Corner Brook Lake and Trout Pond water supply areas. A water treatment plant was commissioned in 2015 with a flow rate of up to 30-million litres per day, and has sufficient capacity for residential, commercial/industrial, and fire protection services (Upland 2021). In 2026, Corner Brook received \$12 million in funding for a new water storage tank and water pumping station (Kennedy 2026). Corner Brook relies on lift stations to collect wastewater, which is transported via a system of pumps to outfall locations. Corner Brook does not currently have a wastewater treatment plant; however, the City has completed a wastewater treatment strategy and is moving ahead with efforts to provide secondary sewage treatment in accordance with requirements of the federal *Wastewater Systems Effluent Regulations* (Upland 2021). Deer Lake sources its water from Grand Lake, using a gravity-fed system with chlorination and two-stage filtration, while sewage is managed through a lagoon system. Recent funding supports lagoon expansion to improve service and boost treatment capacity (Town of Deer Lake 2025; Housing, Infrastructure and Communities Canada 2026). Pasadena sources water from the Transmission Pond Public Water Supply Area, and Steady Brook from the Steady Brook Public Water Supply Area.

Waste management is the responsibility of Western Regional Waste Management which operates six waste disposal sites in western NL. Garbage is transferred from most communities in the region to the Wild Cove, Bay St. George and Southwest Coast Waste Disposal Sites. Garbage is collected from the waste disposal site and trucked to the regional waste management facility in Norris Arm (MMSB 2019). Household recycling (paper and non-glass containers) is also collected in some communities and taken to a Materials Recovery Facility (Western Regional Waste Management 2023).

5.1.2.6 Health and Emergency Services

The Project is located in NL Health Services' Western Health Zone, previously known as Western Health until the provincial health care system was reorganized in April 2023. As of 2024, the zone had 105 family medicine physicians (a 16.5% increase from 2020) and 80 specialist physicians (a 5.3% increase from 2020) (CIHI 2025). The main hospital, the 164-bed Western Memorial Hospital in Corner Brook, opened in June 2024 (NL Health Services 2025). The Deer Lake Medical Clinic offers community health services, including laboratory, x-ray, blood collection, and care from physicians and nurse practitioners (Western Health 2016). In 2024, the provincial government announced plans for the Deer Lake Regional Health Centre, which will provide offices and clinical space for family physicians, registered nurses, and other health care professionals (Health and Community Services 2024).

Policing services in the region is shared by the Royal Newfoundland Constabulary and the Royal Canadian Mounted Police. Fire services are provided by the Corner Brook Fire Department's Fire Hall, staffed 24 hours a day by a minimum of seven full-time firefighters. The Corner Brook Fire Department also provides emergency response to high angle rescue, water rescue, confined space, and hazardous materials emergencies (City of Corner Brook 2025). Deer Lake also has a local fire department and ambulance service.

5.1.2.7 Transportation

The TCH (Route 1) connects Corner Brook, Massey Drive, and Deer Lake. Route 1 is a paved, four-lane expressway and the primary transportation link in the region. The City of Corner Brook maintains approximately 200 km of paved streets, 15 signalized intersections, and five signalized pedestrian crossing locations within Corner Brook and Massey Drive (Upland 2021). There is an industrial "ring road" that connects the Port of Corner Brook to the TCH.

The Port of Corner Brook has a main berth of 362 m and can accommodate a vessel at a maximum length of 362 m (Corner Brook Port n.d.[b]). The Port operates year-round and has a maximum dockside depth of 10 m. The Port has anchorage adjacent to the Mill. The Port services industrial cargo ships and cruise liners. The Canada Border Service Agency is located nearby for customs clearing and authorizations for disembarking passengers and crew, and the Port is also fully certified under the International Ship and Port Facilities Security Code regulations (Corner Brook Port n.d.[b]).

The nearest operating airport to the Project offering commercial flights is Deer Lake Regional Airport, which provides regular passenger flights serving western Newfoundland, with connections to major destinations in eastern and central Canada (Deer Lake Regional Airport 2024).

5.1.2.8 Land and Resource Use

5.1.2.8.1 Forestry Activity

The Island of Newfoundland is divided into 18 Forest Management Districts (Government of NL 2025d). Operating Plans for the Forest Management Districts outline location of activities (such as timber harvesting, planting, thinning, road construction), growth forecasting, sustainability principles, mitigations, management objectives and strategies. The plans are based on the province's 10-Year Provincial Sustainable Forest Management Strategy and are updated every five years.

The Wind Farm Site is located within Forest Management District 15, which is currently managed under the Forest Management Planning Zone 6 (Districts 14 and 15) Five-Year Forestry Operating Plan (2024–2028; Kruger Industrial 2024). Within this district, CBPPL holds approximately 64% of the total land area and 70% of the productive forest (NLDDFA 2023). The Wind Farm Site is located entirely within the CBPPL timber limits, with the exception of a small portion of the proposed transmission line near the Massey Drive substation (Figure 5.4).

CBPPL has a long operational history in the region, reflecting its established role in forest management on the west coast of Newfoundland. As previously noted, the Mill began operations in 1925 as the Newfoundland Pulp and Paper Company Limited. Ownership transferred to the International Paper Company of Canada in 1928, which operated the Mill for approximately ten years. In 1938, the Mill was purchased by Bowater and subsequently operated as Bowater's Newfoundland Pulp and Paper Mills Limited (later Bowater Newfoundland Limited). In 1984, the Mill was purchased by Corner Brook Holding Company, a subsidiary of Kruger Incorporated, and has since operated as Corner Brook Pulp and Paper Limited.

5.1.2.8.2 Mining Activity

There is no exempt mineral land within the Wind Farm Site. There are a number of quarry permits proximate to or within the Wind Farm Site near the transmission line RoW. In addition, a number of staked mineral claims are present adjacent to the Lady Slipper Road, north of Corner Brook Lake (NLDEM 2026, Figure 5.4).

A review of publicly available geological and land-use information indicates that the Project is located predominantly within the Humber Zone, southwest of the Deer Lake Basin. No known petroleum exploration assets, historical wells, or natural hydrocarbon seeps have been identified within the Project Development Area.

A review of the Newfoundland and Labrador Geodetic Network indicates that no provincial control survey markers are located within the Project Development Area. The nearest control survey marker is approximately 2.5 km from the Project footprint, and no disturbance to geodetic monuments is anticipated.

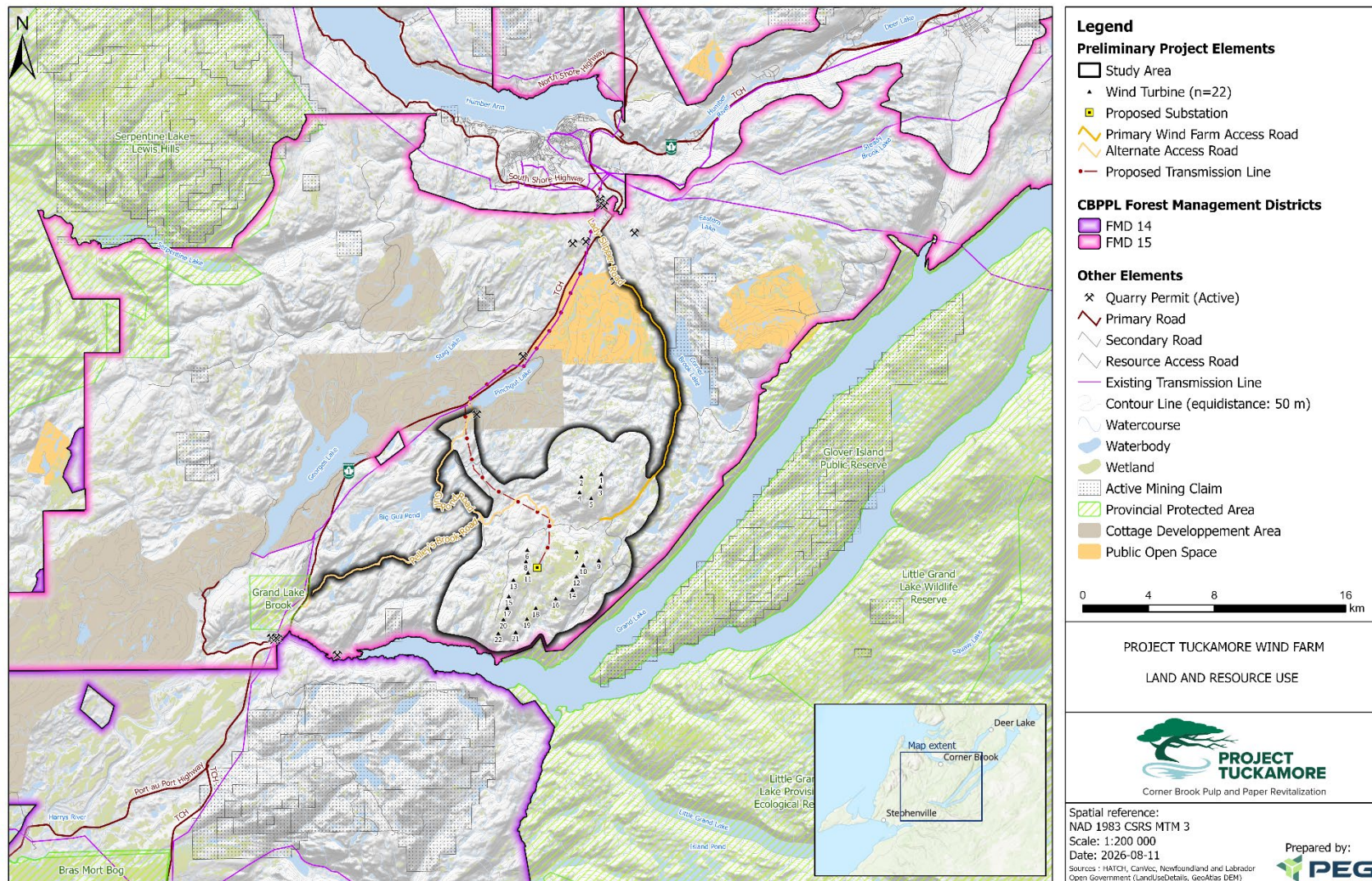


Figure 5.4 Resource Use Near the Project

5.1.2.8.3 Designated Lands

Designated lands have defined uses under federal, provincial or municipal regulations, or land trust agreements. These include provincially owned Crown lands, provincial parks, protected areas, wildlife management areas, agricultural areas of interest, municipal planning areas, and protected roads. Protected areas, wildlife management areas, and protected roads are described in the following section. Some designated Crown lands are subject to specified uses, including domestic wood harvesting, commercial forestry, mining and quarry development/exploration, and easements for utility infrastructure such as transmission lines.

The Crown Lands Division of the NLDFAL is responsible for the management and allocation of Crown Lands within the province. Occupied Crown lands include licensed areas or those with applications for cabins, outfitting lodges, and satellite camps. The Crown titles provide individuals with a legal claim to ownership and the right to possess specified parcels of land. There are 44 small Crown title plots in the vicinity of the Wind Farm Site, the majority of which are located near the proposed transmission line and access roads (Figure 5.4). WTGs will be sited in accordance with industry best practices and informed by noise and shadow flicker assessments, with a current design target of 1,000 m from human receptors. The proposed transmission line traverses George's Lake Cottage Planning Area, Reid Lot Cottage Development Freeze Area, and Stag Lake Crown Lake Reserve and will generally follow an existing RoW. CBPPL will continue to engage with the Crown Lands Division regarding Project activities within these areas.

5.1.2.8.4 Protected Areas and Wildlife Management Areas

There are no sensitive wildlife areas, provincial parks, park reserves, or designated and provisional ecological reserves within the Wind Farm Site. There are three provincially protected reserves surrounding Little Grand Lake, located to the east and southeast of the Wind Farm Site: the Little Grand Lake Wildlife Reserve, the Little Grand Lake Provisional Ecological Reserve, and the Glover Island Public Reserve (PAANL 2008; Government of NL 2017b; NLDECCC n.d).

NLDFAL is responsible for wildlife management and conservation, governed by the *Wildlife Act* and its regulations. The NLDFAL designates wildlife management areas across the province, such as Moose Management Areas, Black Bear Management Areas, coyotes and wolves, furbearer management zones, and small game zones (NLDFFA 2025).

Two Moose Management Areas—Area 7 (South Brook; NLDFFA n.d.[a]) and Area 6 (Corner Brook; NLDFFA n.d.[b])—as well as one Black Bear Management Area (Area 202 – Western; NLDFFA 2025), and Island-wide coyote and wolf management areas, furbearer zones, and small game hunting zones (NLDFFA 2025), overlap the Wind Farm Site.

Forest Management Planning Zone 6 (which includes FMD 15) supports outfitting operations, that contribute to seasonal employment for people in nearby communities (NLDFFA 2023). Several outfitters operate in the Zone. CBPPL will continue to engage with local outfitters to inform them of planned Project activities, identify potential interactions with outfitting operations, and develop appropriate mitigation measures where required.

The *Protected Road Zoning Regulations* under the *Urban and Rural Planning Act* provides protection of designated major and secondary highways throughout the province. Proposed development adjacent to those highways must conform to zoning and regulations established for the area (NLDMA 2013). A review of the Wind Farm Site footprint indicates that portions of the access road network, including the Lady Slipper Resource Road near its intersection with the TCH, fall within the Protected Road Zoning Area designated as RTE 1 – TCH Channel-Port aux Basques to Corner Brook under the *Urban and Rural Planning Act, 2000*. The TCH is a provincially designated protected road, with adjacent lands subject to specific land use controls intended to preserve traffic safety, highway function, and visual quality. Within this corridor, applicable zoning designations and permitted uses are governed by the Protected Road Zoning Plan for the TCH.

WRMD enforces the *Water Resources Act* to safeguard public drinking water by designating Protected Public Water Supply Areas (PPWSAs) and regulating activities that could impact water quality or quantity. Development within or near PPWSAs requires ministerial approval and must adhere to provincial policy. There is a PPWSA, Trout Pond, located adjacent to the existing RoW of the transmission line near Massey Drive in Corner Brook. Trout Pond is protected under the *City of Corner Brook Act*.

5.2 Potential Resource Conflicts

The Project will comply with established operational permits, plans, and procedures maintained by CBPPL. The regulatory pathways are outlined in Table 5.10. CBPPL is dedicated to collaborating with regulatory bodies to update and amend existing permits and approvals at the Mill Site, hydro power sites, and across forestry operations. Continued engagement and cooperation with authorities will facilitate an efficient permitting process and verify that environmental and operational standards are consistently upheld. In collaboration with NL regulators, CBPPL intends to promote sustainable resource management and responsible development throughout the duration of the Project.

Table 5.10 Current Regulatory Pathways and Commitments

Project Component	Regulatory Requirements	Key Considerations/Commitments
Forestry Modernization Activities	CBPPL's forestry operations are guided by a five-year planning process, as specified in the <i>Forestry Act</i> and its Regulations. Future adjustments to harvest levels (AACs) or harvesting methods will be incorporated into the Five-Year Operating Plans that are submitted through the EA process for approval. Alongside these five-year plans, CBPPL also submits Annual Operating Plans to the NLDFAL every year by November 15.	- Activities associated with forestry modernization will be within currently approved AAC limits. There are no plans to revise the five-year management plans at this time, as current strategies remain aligned with provincial standards. - CBPPL will work with applicable regulators, aiding decision-making for environmental policy. - CBPPL will maintain its established reporting protocols by preparing annual reports and five-year plans as required.

Table 5.10 Current Regulatory Pathways and Commitments

Project Component	Regulatory Requirements	Key Considerations/Commitments
Mill Site – Dryer and Boiler Modifications	Change in emissions at the Mill Site related to the dryer and boiler modification will continue to be managed in accordance with the revised CofA.	- Air and GHG emissions at the Mill Site are anticipated to decrease with the implementation of the modernization activities. CBPPL will conduct air dispersion modelling and GHG emissions estimates to reflect the upgrades in consultation with Pollution Prevention Division through the amendment of their CofA. A GHG emissions inventory for updates at the Mill Site will be conducted in support of the revised CofA. - CBPPL is currently considered a large emitter of GHGs in NL, with emissions of approximately 20,000 t CO₂e per year. With the anticipated changes, GHG emissions are predicted to decrease to approximately 2,000 t CO₂e annually. After three years of GHG emissions below 15,000 t CO₂e per year, CBPPL would have the option to remove themselves from the annual reporting and compliance process required by the MGGR. Depending on the actual annual emissions, CBPPL may not need to continue with federal GHG reporting (currently starts at 10,000 t CO₂e.).
Mill Site – Oil Tank Farm and Pipeline Decommissioning	Phased Environmental Site Assessments (ESA) will be conducted to determine if contamination is present, and if it is, determine the nature and extent of contamination to support decommissioning. Environmental Site Assessments and remediation will be conducted as per Policy Directive PPD05-01 Guidance Document for the Management of Impacted Sites, Version 2.0 (dated Sept 2005; updated Jan 2014).	In consultation with Pollution Prevention Division, CBPPL will decommission the oil tank farm and associated pipeline. These activities will be carried out in accordance with relevant environmental standards and regulatory requirements. Phased Environmental Site Assessments will be completed to determine contamination, and remediation will be performed in accordance with the Guidance Document for the Management of Impacted Sites.
Hydro Power	Modernization at the hydro power sites will align with existing operational requirements and adhere to relevant provincial and federal requirements, including compliance with water rights legislation, through consultation with WRMD. Electrical and protection system upgrades will be required to design and operate in compliance with the Canadian Electrical Code as adopted by NL and follow provincial variances issued by Service NL. Dam safety, regulated by WRMD, will be maintained through regular inspections and reporting, in accordance with provincial dam safety regulations, including implementation of updated risk assessment protocols and emergency preparedness plans.	- Project works at DLP and Watson's Brook will be conducted within existing water licences and necessary permits, with ongoing monitoring for the protection of water resources. CBPPL will work with WRMD to determine if additional or new licences, approvals, or permits are required. - DLP will continue its on-going communications with the Town of Deer Lake and continue to protect the municipal water supply through its operational and upgrading activities.

Given the established regulatory processes for the forestry operations, Mill Site, and hydro power sites, this section is focused on the potential resource conflicts associated with the wind farm component. The sections below consider potential conflicts for each Project phase: construction, operation, and decommissioning/rehabilitation. This section also describes potential environmental and socio-economic effects and outlines standard mitigation measures intended to avoid, reduce, or manage them. As planning and design of the wind farm progresses and additional information becomes available, potential resource conflicts and mitigation measures may be reassessed and refined. The wind farm has been designed based on known environmental constraints and best available information. A summary of preliminary constraints and setback distances is provided in Table 5.11.

Table 5.11 Environmental Constraints and Applicable Setbacks

Feature	Intersection with Wind Farm Site	
	Wind Farm	Transmission Line
Sensitive Wildlife Areas (Newfoundland marten critical habitat)	Yes	Yes
Designated Provincial Parks and Parks Reserves	No	No
Designated and Provisional Ecological Reserves	No	No
Mineral Leases	No	No
Standard Setbacks		
Dwellings	1,000 m from WTGs	N/A
Waterbodies, watercourses, and wetlands	15 m from planned surface disturbance	15 m from planned surface disturbance
Primary Resource Roads	220 m from WTGs	N/A
Note: Standard setback distances are based on other wind projects in the province that have filed registrations.		

In addition to the standard mitigation, environmental management measures will be developed and implemented to conduct construction and operation of the wind farm in an environmentally and socially responsible manner. These measures will be grounded on both regulatory requirements and Kruger Energy practices that are applied at other wind farms that they operate across Canada. In addition is the preparation of several management plans including an EPP and ERP (Section 3). As described in Section 3, CBPPL has an EMS in place which will be used to support the development of mitigation and management measures related to the wind farm. CBPPL has been an operator in the area for over four decades and has worked with regulators to establish best management practices for their operations.

5.2.1 Atmospheric Environment

Interactions from the development of a wind farm on the atmospheric environment includes changes to both air quality and sound quality. Air quality is the composition of the ambient air, including the types and amounts of contaminants present that could have adverse effects on vegetation, wildlife, and human health. Sound quality is characterized by the magnitude, frequency, and duration of sound. Noise is unwanted sound that can adversely affect wildlife or human health. In addition to changes in air quality and sound quality, GHGs released from Project-related activities will contribute to the global concentration of GHGs in the atmosphere, which is a driver of climate change.

Various Project activities will contribute to the release of air contaminants, GHGs, and noise emissions, mainly during construction for air contaminants and GHGs while noise would be emitted during both construction and operation.

As air quality in the wind farm area has historically been good with possible infrequent exceedances of particulate matter only (based on data from the Corner Brook ambient stations), and as modern and well-maintained construction equipment will be used, emissions of combustion gases are not expected to lead to exceedances of the air quality standards.

Dust (including TPM, PM_{2.5}, PM₁₀) is the primary air contaminant of concern for construction projects. Dust management will be part of the EPP for the wind farm and include visual monitoring of dust levels, review of weather conditions to identify potential periods when dry and windy conditions can be expected, and implementation of dust suppression as needed (water or other approved suppressant). Areas that can be re-vegetated following construction activities will be re-vegetated as soon as possible to reduce fugitive dust from cleared areas. Speed limits will be placed on access roads to limit the generation of dust from unpaved roads. With mitigation, dust is expected to be able to be managed below the air quality standards most of the time. If dust complaints are received, the proponent will follow up promptly and implement a complaint resolution process which may include air quality monitoring and additional dust mitigation.

Based on estimates of heavy equipment required for construction of the wind farm and the areas to be developed, estimates of GHGs during construction were completed. The total construction GHG emissions from heavy equipment are estimated at 4,733 t CO₂e over the three-year construction period. An additional 1,449 t CO₂e is estimated to be released from fuel required for on-road transportation of construction materials from the Port in Corner Brook to the Wind Farm Site. As compared to NL's total GHG emissions for 2024 of 8,620,000 t CO₂e, excluding emissions from land use and land use change, these construction emissions represent less than 0.1% of the provincial total GHG emissions annually.

Land clearing will occur to construct roadways (limited as existing roads will be used but may need upgrades), transmission lines, the substation area, WTG pads, and buffer areas. Land clearing may result in the release of this carbon back to the atmosphere. The timber will be salvaged and used where feasible. It is assumed that of the total forested area, 25% will be salvaged for non-combustion end use, and of the remainder 40% will end up being burned (e.g., home heating in local communities or used in existing industrial operations). It is assumed that the remaining material (35%) would be mulched and spread to decompose. Based on a forested area of 1,174 ha and a bog area of 174 ha, the estimated GHG emissions released from land clearing are 364,262 t CO₂e. This is expected to be conservatively high as some of the area is already cleared, some of the buffer areas included in the estimates may not need to be cleared, and timber will be salvaged wherever possible. In addition, the estimate used conservative assumptions on the density of biomass in the Wind Farm Site. The land-use change emissions would occur over approximately 20 years.

GHGs emissions during operation of a wind farm are very low, with just routine maintenance vehicles being operated infrequently. Emergency generators using diesel may be used infrequently during operation but are not expected to generate notable GHG emissions due to the infrequent use. In addition, the wind farm will provide renewable energy to offset some of CBPPL's current GHG emissions, with GHGs expected to decrease below federal and provincial reporting levels.

Table 5.12 summarizes the GHG emissions for the 3-year construction period (annual and total emissions). Emissions annually during operation are expected to be negligible from the wind farm.

Table 5.12 Summary of Construction GHG Emissions

Construction	Annual -3-year Construction Period				Total Construction Period			
Scope 1	t CO ₂	t CH ₄	t N ₂ O	t CO ₂ e per year	t CO ₂	t CH ₄	t N ₂ O	t CO ₂ e
Civil Earthworks (diesel mobile and stationary equipment)	1,542	0.04	0.13	1,578	4,625	0.13	0.39	4,733
Scope 2								
Electricity	Negligible	Negligible	Negligible	Negligible	-	-	-	-
Scope 3								
Supply deliveries - from Corner Brook	475	0.02	0.03	483	1,426	0.06	0.08	1,449
Totals								
Direct (Scope 1)	1,542	0.04	0.13	1,578	4,625	0.13	0.39	4,733
Indirect (Scope 2 + Scope 3)	475	0.02	0.0	483	1,462	0.06	0.1	1,449
Scope 1, 2 and 3 total (excluding land clearing)	2,017	0.06	0.2	2,061	6,052	0.18	0.5	6,182

Hatch was retained to conduct a noise assessment to evaluate the impact that wind farm construction and operation activities have on the nearest sensitive receptors (Hatch 2026a, Appendix F). Noise receptors representing community noise-sensitive locations were identified and receptors were modelled at a height of 4 m to represent a second-story room. Receptor locations and distance to the nearest WTG are shown in Table 5.13.

Table 5.13 Representative Point of Reception Locations

Point of Reception ID	Distance from Nearest WTG	
	WTG ID #	(m)
1	1	4,090.8
4	3	2,268.9
6	9	1,501.2
7	13	2,063.8
9	6	2,803.4
13	6	3,112.6
23	6	3,308.0
29	2	6,080.1
30	2	7,130.8

Table 5.13 Representative Point of Reception Locations

Point of Reception ID	Distance from Nearest WTG	
	WTG ID #	(m)
31	2	6,530.6
32	2	7,351.6
33	2	7,725.4
34	6	4,381.5

Source: Hatch (2026a) Appendix F

As discussed in Section 5 of Appendix F, common construction stages and equipment were used for each stage for a typical wind farm construction project. The loudest construction phase was determined to be earth works (Hatch 2026a, Appendix F). To estimate the effect that Project noise would have on the nearest receptors, a metric called the “percent highly annoyed” or %HA was calculated for both the baseline level of 35 dBA and the earth works level at each receptor. Health Canada states that an increase in %HA from baseline of 6.5% or more requires additional mitigation. The Hatch report found that during construction only receptors that were in close proximity to the main access roads (i.e., 9, 13, 34) experienced a change in %HA of 6.5% or more. The planned access roads, however, are currently designed within a 50 m development corridor along existing access roads. Therefore, additional buffering from receptors may be attainable to reduce noise impacts at identified receptors.

The preliminary assessment of sound quality during operation considered noise from the WTGs and the transformers. The Hatch report included the 22 WTG layout and substation, as shown in Figure 2.4. The %HA at each receptor during operation was estimated and compared to the %HA in the baseline condition. The change in %HA was found to be below the Health Canada limit of 6.5% for receptors (Hatch 2026a, Appendix F). Although the change in %HA was predicted to be acceptable, if there are substantive changes to the layout during detailed design, the assessment will be rerun and mitigation strategies to reduce effects on local communities will be developed. Measures such as reduced vehicle speeds, equipment maintenance, and timing restrictions (i.e., limited or no construction activities at night) will be implemented to reduce the intensity and duration of these effects. A complaint resolution process will also be in place for the Project which could include follow-up noise monitoring if noise complaints are received.

Table 5.14 provides potential resource conflicts from the Wind Farm Site with the atmospheric environment for each Project phase. It also outlines standard mitigation measures intended to avoid, reduce, or manage them. With the implementation of these mitigation measures, Wind Farm Site activities are not anticipated to result in substantive resource conflicts with the atmospheric environment.

Table 5.14 Atmospheric Environment Potential Resource Conflicts and Mitigation

Potential Resources Conflict	Project Phase			Mitigation Measures	Considerations
	C	O	D		
Air contaminant emissions (PM, PM_{2.5}, PM₁₀, NO_x, SO₂, and CO) are expected to result from the combustion of fossil fuels in both mobile and stationary equipment, as well as from blasting activities during construction of the wind farm. Limited air contaminant emissions are anticipated during operation and decommissioning of the wind farm.	X	X	X	- Project vehicles, equipment, and exhaust systems and mufflers will be regularly inspected and maintained according to manufacturer recommendations. - Project vehicles, heavy equipment, and machinery will be turned off when stationary for extended periods. Vehicle and equipment idling will be reduced when practical. - Dust will be managed through measures such as speed control, water application for suppression during dry periods, and regular road maintenance. - Air quality management measures will be included in the EPP which will specify the mitigation measures for the management and reduction of air contaminant emissions.	- Project activities will generate localized air contaminant emissions due to the use of equipment and vehicles during all phases of the Project, as well as dust during construction activities. The magnitude of the releases will be limited and well managed. - The main concern will be during construction related to dust releases from equipment and material movements. Where required, dust will be controlled by using applications of water or other approved agents. - Standard mitigation measures will be implemented to reduce adverse effects on air quality. - Potential conflicts with air quality are anticipated to be temporary, primarily occurring during the construction phase (three years), and localized in nature (i.e., occurring with the Wind Farm Site). - With the implementation of these mitigation measures, Project activities are not anticipated to result in substantive resource conflicts with air quality.
Fugitive dust (PM including PM₁₀, PM_{2.5}) can result from equipment and material movement. Activities such as loading and unloading materials, driving trucks on unpaved roads, and preparing WTG pads can contribute to the generation of dust, particularly during dry and windy conditions. Fugitive dust has the potential to affect human health as well as environmental effects to wildlife, fish and fish habitat, vegetation, and surface water.	X	X	X		
GHGs are expected to result from the combustion of fossil fuels in both mobile and stationary equipment, as well as from blasting activities during construction of the wind farm. Limited GHGs are anticipated during operation and decommissioning of the wind farm, and the wind farm will help reduce GHGs from the existing operation of the CBPPL Mill.	X	X	X	Heavy equipment will be operated in a manner that promotes fuel efficiency, thereby reducing GHG emissions. This would include reduced idling, traffic planning and management, and speed limits on Project roads.	- GHGs will be emitted during construction. During operation of the wind farm, no substantive GHGs occur and GHGs will be reduced over current emissions at the Mill. Therefore, it is anticipated to result in a positive change in GHGs over the life of the wind farm. - Sound emissions will primarily occur during the construction phase. Noisy activities, such as blasting or heavy machinery operation, will be conducted during daytime hours to the extent practical when background noise levels are higher and disturbance is less pronounced.

Table 5.14 Atmospheric Environment Potential Resource Conflicts and Mitigation

Potential Resources Conflict	Project Phase			Mitigation Measures	Considerations
	C	O	D		
The use of earthmoving equipment and construction activities to construct and decommission the Project have the potential to result in noise. During both the construction and decommissioning phases, heavy machinery can produce noise, including engine sounds, mechanical movements, and backup alarms, which may affect nearby land users and wildlife. In addition, blasting will cause a sudden, loud noise that can be distressing to those nearby. These activities can temporarily increase ambient noise levels.	X	-	X	- Blasting procedures will be prepared by the blasting contractor to outline procedures for the storage, handling, and use of explosives and their components at the Wind Farm Site. Procedures will address the safety of the public and Project personnel, as well as the protection of the environment and Project infrastructure. - Project vehicles, equipment, and exhaust systems and mufflers will be regularly inspected and maintained according to manufacturer recommendations. - WTGs will be sited in accordance with industry best practices and informed by noise and shadow flicker assessments, with a current design target of 1,000 m from human receptors. - Micro-siting of Wind Farm Site components, or the use of equipment with lower noise emissions during operation, can be considered as adaptive management to reduce noise levels at nearby receptor locations. - CBPPL will continue to engage with nearby receptors and local resource users regarding wind farm activities, including the communication of Project information, updates on ongoing and planned activities, a discussion of issues and concerns, and a potential means of addressing them through an Inquiry/Complaint Resolution Plan (Section 3.2).	- The wind farm will be designed to meet noise guidelines (45 dBA at nearby residences/seasonal cabins) and required setbacks will be established so WTGs are located at a sufficient distance from homes and sensitive receptors, therefore, reducing exposure to operational noise. Currently, the nearest cabin is approximately 1,500 m from a WTG. - Standard mitigation measures will be implemented to reduce adverse effects on sound quality, such as using well-maintained equipment fitted with noise suppression technology, such as mufflers and acoustic enclosures, to limit sound emissions. - Wind farm construction noise is anticipated to be temporary and intermittent over a 24-month period, and localized in nature (i.e., occurring with the Project Area). Noise emissions during operation will be long-term, however they will be at a lower intensity. - With the implementation of the identified mitigation measures, Project activities are not anticipated to result in substantive resource conflicts with the acoustic environment.
Sound emissions will result from blasting during construction. Controlled blasting operations, which may be necessary to break up rock formations or clear foundation sites for the Project, release sudden bursts of energy that create both audible noise and vibrations. These effects may be particularly noticeable to communities or sensitive receptors located close to the construction zone.	X	-	-		
Noise emissions are anticipated to occur from the operation of the WTGs. Once operational, the WTGs will produce continuous noise, primarily from the rotation of blades and transformers. This operational noise may include aerodynamic sounds and mechanical hums, which could affect the sound quality of the surrounding area. The intensity and character of WTG noise can depend on factors such as wind speed, WTG design, and distance from the nearest receptor.	-	X	-		

5.2.2 Water Resources and Aquatic Environment

Interactions from Project-related activities associated with the wind farm include potential effects on groundwater, surface water, and the aquatic environment, and have the potential to affect existing water uses and aquatic ecosystems if not appropriately managed. Potential interactions are expected to occur primarily during construction and are generally associated with ground disturbance, vegetation removal, watercourse crossings, and infrastructure development. Limited interactions may also occur during operations due to surface water runoff and maintenance activities. Similar interactions may also occur during decommissioning at the end of the Wind Farm Site life, but to a lesser extent.

Groundwater occurs within overburden and fractured bedrock beneath the Wind Farm Site and plays an important role in maintaining baseflow to streams, wetlands, and other surface water features that support aquatic habitats. Groundwater may also be used locally for potable or domestic use. Project interactions with groundwater are expected to occur primarily during construction of WTG foundations and may include localized and temporary lowering of the water table where blasting or dewatering is required, as well as limited changes to groundwater recharge resulting from soil disturbance and compaction. Due to the relatively shallow depth of WTG foundations (Section 2.3.5) and short duration of construction activities, and the localized zone of influence associated with dewatering, Wind Farm Site activities are not anticipated to result in substantial or sustained effects on regional groundwater systems, groundwater-dependent surface water features, or existing groundwater users, and are not considered further.

Surface water includes streams, ponds, lakes, wetlands, and drainage features located within and adjacent to the Wind Farm Site that form part of local watersheds and contribute to downstream hydrology and aquatic habitats. These surface water features support ecological functions and are linked to broader watershed processes. Construction activities for the Wind Farm Site, including site preparation, access road construction, works associated with transmission and collector lines, and WTG foundation development, have the potential to interact with surface water resources through ground disturbance, vegetation removal within RoWs, construction dewatering, and the installation of watercourse crossing structures. These activities may result in changes to surface water quality, including increased suspended sediment concentrations, decreased water clarity, and alterations of physical habitats downstream, or result in the accidental releases of fuel, lubricants, or other hazardous materials if not properly mitigated or managed. Changes in water quantity (i.e., flow) can occur because of general development, road construction, and deforestation, and can increase surface runoff rates, increasing peak flow response to precipitation in a given catchment. During operation, interactions with surface water quality would be associated with maintenance activities associated with access roads and transmission line/collector RoWs (e.g., dust or vegetation clearing). Interactions with surface water quantity during operations are expected to be negligible.

There is potential for interactions between the wind farm and water resources, including recreational waterbodies and potable water supplies. Available information indicates that there are no designated protected public drinking water supply areas within the Wind Farm Site; however, waterbodies within the broader area may be used on a recreational basis (e.g., fishing or boating), and private groundwater wells may be present in the surrounding region. The potential for Project-related effects on water quality could occur during construction activities through accidental events (e.g., fuel or hazardous material spills) and increased sedimentation from ground disturbance. Blasting associated with foundation installation may also present a pathway for localized groundwater effects where conducted in proximity to groundwater-bearing formations.

Separation distances between wind components and potential groundwater receptors are expected to reduce the likelihood of interaction. Based on the preliminary layout, the nearest WTG (WTG 2) is located approximately 6 km from the nearest identified well. Linear infrastructure is located closer to potential receptors, including the transmission line RoW at approximately 220 m, the transmission line at approximately 720 m, and Lady Slipper Road at approximately 7 km. Based on these distances and the localized nature of construction activities, interactions with groundwater wells are not expected. Standard mitigation measures will be implemented to protect water resources, including erosion and sediment control during construction, spill prevention and response measures, and appropriate storage and handling of fuels and hazardous materials. Blasting will be conducted in accordance with applicable regulatory requirements and best management practices to limit potential effects on groundwater. With the implementation of these measures, potential effects on nearby recreational water uses and potable water supplies, including groundwater wells, are expected to be limited in magnitude, localized, and temporary in duration, primarily occurring during the construction phase.

Should water be required for activities at the wind farm (e.g., if a concrete batch plant is required), prior to the start of construction, CBPPL will apply for and obtain a Water Use Licence under the *Water Resources Act, 2002*. As described in Section 2.3.5, should a batch plant be used, water use and wash water management during batch plant operation would be conducted in accordance with the Environmental Code of Practice for Concrete Batch Plant and Rock Washing Operations (Government of Newfoundland and Labrador, Department of Environment and Lands 1992). Water intakes for the concrete batch plant will be designed to reduce fish impingement and entrainment, considering applicable guidance and flow thresholds, with details to be confirmed in consultation with DFO and submitted through a Request for Review (or Authorization, if required) under the *Fisheries Act*. If a new wastewater outfall is to be constructed, CBPPL will provide a description of the in-water or near-water works, undertakings, and activities associated with placement of the outfall piping, along with a baseline description (based on ground surveys) of the receiving waterbody. Field surveys will determine the presence of and characterize sensitive areas (e.g., spawning and rearing). CBPPL will submit a Request for Review to DFO for these works. Additionally, CBPPL will develop a Concrete Batch Plant Management Plan which will describe the location and operation of the batch plant, water supply, and water intake. The plan will also include a description of water management measures, noise mitigation, and dust control.

Freshwater fish include the eggs, larvae, juvenile and adult life stages of fish. Fish habitat includes streams, ponds lakes, that support fish by providing spawning, nursery, rearing, feeding, and migration habitat, as well as other aquatic organisms that contribute to the freshwater food web. During construction of the wind farm, potential resource conflicts include erosion and sedimentation, alteration of riparian vegetation, in-water work or fish passage associated with watercourse crossings, and release of deleterious substances. During operation, interactions with fish and fish habitat may be associated with routine maintenance activities associated with access roads and transmission line/collector RoWs (e.g., dust or vegetation clearing).

As described previously, disturbance to surface water quality and the aquatic environment (e.g., fish habitats) are generally most pronounced during construction, when soils are exposed, vegetation is being cleared, and work-in or near water is required. To avoid potential disturbances, WTGs and transmission line/collector poles will be sited to avoid, to the extent practical, watercourses and waterbodies, buffers will be maintained to the extent feasible and watercourse crossings will be appropriately designed and installed. Where avoidance is not feasible, mitigation measures outlined in Table 5.15 have been developed with consideration of the following regulations, guidelines, standards, and codes of practice:

- Request a Review of your Project Near Water (DFO 2026a)
- Guidelines for the Use of Explosives in or Near Canadian Fisheries Waters (Wright and Hopky 1998)
- Best Management Practices for the Protection of Freshwater Fish Habitat in NL (DFO 2022)
- Quantitative electrofishing in Newfoundland and Labrador (Scruton and Gibson 1995)
- Standards and Codes of Practice (DFO 2026b, 2026c)
- Standard Methods Guide for Freshwater Fish and Fish Habitat Surveys in Newfoundland and Labrador: Rivers and Streams (Sooley et al. 1998)
- Aquatic invasive species (DFO 2026d)
- Planning for land-based erosion and sediment control (DFO 2026e)

These measures include erosion and sediment control, stabilization of disturbed areas, and spill prevention and response procedures. Climate projections will inform the design and implementation of erosion and sediment control measures by providing an indication of the magnitude and frequency of rainfall events that may occur over the life of the Project. This information will be used to support the sizing of drainage infrastructure, selection of appropriate erosion and sediment control measures, and planning for construction under variable and extreme weather conditions. Established CBPPL erosion and sediment control measures will be implemented as early as possible during site preparation as per the ESCP. Potential effects will be managed adaptively if required, to respond to unanticipated conditions. Substantive changes to surface water quantity are not anticipated where water crossings are designed appropriately and existing drainage patterns are maintained.

For fish residing in streams or ponds, in-water work could result in disturbances to spawning adults, incubating eggs, or juveniles. In-water work will be conducted to respect DFO timing windows for the Island of Newfoundland by water type (DFO 2025). Fish rescues will be conducted to remove fish from isolated areas during in-water work, as required by DFO. The use of explosives for blasting in or near water during construction of access road crossings and WTG foundations could result in instantaneous changes in pressure, and injury or death of fish. Appropriate blasting setbacks will be maintained or alternately fish may be temporarily relocated, in consultation with DFO. Where in-stream work is required, activities will be conducted in accordance with applicable regulatory requirements. This includes permits issued under section 73 of the *Fisheries Act* for aquatic SAR (i.e., banded killifish) be obtained prior to fish field surveys or in-water construction activities, as required by DFO.

During operation, maintenance activities associated with access roads and transmission line/collector RoWs (e.g., dust or vegetation clearing) could result in disturbances to surface water quality or the aquatic environment. Operational and erosion and sediment controls will remain in place to prevent the release of contaminants, dust or sediment to the surface waters within the aquatic environment. Erosion and sediment drainage controls will be inspected and maintained as part of regular operations, and monitoring and adaptive management measures may be implemented, if required, to respond to unanticipated conditions.

As described in Section 3.3, surface water quality and fish and fish habitat surveys, including desktop reviews and field assessments, will be conducted to inform Project siting and characterize aquatic environments, and fish presence or absence (including SAR) in watercourses that may be affected by the wind farm.

Table 5.15 provides potential resource conflicts from the Wind Farm Site on water resources and the aquatic environment for each Project phase. It also outlines standard mitigation measures intended to avoid, reduce, or manage those potential disturbances. CBPPL constructs over 70 km of roads each year with standard approved measures in place to reduce adverse effects to surface water resources and the aquatic environment. With the implementation of these mitigation measures, the Wind Farm Site activities are not anticipated to result in substantive resource conflicts with water resources and the aquatic environment.

Table 5.15 Water Resources and Aquatic Environment Potential Resource Conflicts

Potential Resources Conflict	Project Phase			Mitigation Measures	Considerations
	C	O	D		
Dewatering could result in localized reductions in the water table and changes to groundwater recharge.	X	-	-	- Erosion and sediment control measures will be implemented as early as possible during site preparation as per the ESCP. - Erosion and sediment drainage controls will be inspected and maintained as part of regular operations, and monitoring and adaptive management measures may be implemented, if required, to respond to unanticipated conditions. - Heavy equipment and machinery are not permitted in watercourses, waterbodies, on a wetland, or a bog, unless frozen, without a permit from WRMD and/or DFO. - A vegetated buffer will be maintained to the extent practicable within 15 m of waterbodies with grubbing limited to areas required for watercourse crossings and associated infrastructure. Disturbed areas will be stabilized following construction to reduce erosion potential. - When practical, work will be scheduled to avoid high precipitation and runoff events or periods, which could increase potential for erosion/sedimentation. - In-water work will be scheduled in consideration of DFO timing windows for the Island of Newfoundland to avoid potential adverse impacts on spawning, egg incubation, and fish migrations. - Timing of in-water work will consider spawning and incubation stages of SAR. - The duration of instream works will be reduced to the extent possible. - Fording and in-water work will be kept to a minimum. In-water work areas will be isolated as required. Work is to be carried out from dry stable areas on land, unless authorized. - Stream banks are to be rehabilitated upon removal of coffer dams and installation of watercourse crossings. - Discharges associated with dewatering will be directed to vegetated or stable areas away from watercourses or filtered through sediment control measures prior to release. - Water use and wash water management during batch plant operation will be conducted in accordance with the Environmental Code of Practice for Concrete Batch Plant and Rock Washing Operations. Wash water will be maintained closed system rinsing / settling basin prior to discharge which will be cleaned as required to maintain retention capacity.	- There are no private wells located within 100 m of Wind Farm Site activities. - Effects of the wind farm will primarily occur during the construction phase and will generally be localized in nature. - There is a protected public water supply area, Trout Pond, located within the existing RoW of the transmission line near Massey Drive in Corner Brook. A development permit will be obtained for work adjacent to or within a protected public water supply area. - Erosion and sedimentation control measures will be followed throughout the life of the Wind Farm. - Prior to the start of construction, a permit will be obtained for work within 15 m of a body of water (including wetlands). - The WTG footprints and access road crossings have been designed to avoid fish habitat to the extent practicable. Where avoidance is not feasible, the application of best practices in accordance with DFO's "Measures to Protect Fish and Fish Habitat", DFO standards and codes of practices and other standard mitigation will be employed to reduce the potential for effects.
Site preparation including clearing riparian vegetation, stripping soils or grading access roads or WTG pads could result in changes to surface water quality as a result of increased sedimentation.	X	-	X		
Wind Farm Site activities may alter the natural flow regime through changes to surface vegetation cover, imperviousness, and drainage divides, resulting in changes to surface water quantity.	X	-	-		
Construction dewatering and discharge may affect surface water quality if not properly managed.	X	-	-		
Blasting has the potential to affect groundwater by altering the natural drainage and infiltration patterns. Blasting can temporarily affect groundwater flow paths by changing infiltration rates and surface water flow patterns.	X	-	-		
Accidental releases of fuel, lubricants, or other hazardous materials during Wind Farm Site activities may affect water quality and aquatic habitats.	X	X	X		

Table 5.15 Water Resources and Aquatic Environment Potential Resource Conflicts

Potential Resources Conflict	Project Phase			Mitigation Measures	Considerations
	C	O	D		
Timing of in-water work has the potential to result in the death of early life stages of fish, including SAR.	X	-	-	- Prior to release, wash water will be tested for parameters related to concrete and additives, pH, and total suspended solids, and parameters specified in the provincial <i>Environmental Control Water and Sewage Regulations</i> and parameters related to fish habitat protection required in the federal <i>Fisheries Act</i>. If the wash water does not meet discharge requirements, it will be further treated until the criteria are met. - Fuel storage, handling, and servicing will occur outside setback distances from waterbodies and surface and groundwater features. - Secondary containment and spill kits will be available onsite and immediate spill response and reporting procedures will be implemented. - Potential impacts to water resources and the aquatic environment will be mitigated through the implementation of the EPP, ESCP, and other applicable plans identified in Table 3.1. - Siting of Wind Farm Site infrastructure will be designed to avoid fish habitat were practicable. - Coffer dams will be used to isolate in-water work areas from the stream when installing bridges or similar structures requiring abutments or footings. - CBPPL will meet DFO requirements for culvert designs to reduce alterations to fish habitat. - Runoff will be directed away from active work areas before construction commences, reducing the volume of sediment-laden water to be managed. - If sediment laden water is observed, work will be stopped and additional mitigation measures will be implemented to prevent dispersal. - Fish which are trapped/stranded within isolated work areas, will be safely relocated as required by DFO. - Permanent bridges will be used where appropriate to convey natural flows. - Obstructions to the movement or migration of fish will be avoided. - Culverts will be designed and installed to meet site-specific crossing requirements and maintain fish passage. - Crane pads will be constructed in the "High and Dry", away from watercourses and wetlands when practical, with appropriate erosion and sedimentation control installed around each individual pad. - Fish habitat lost as a result of in-water works will be offset as required under the <i>Fisheries Act</i>.	- As discussed in Section 5.1.1.3, the Wind Farm Site infrastructure is anticipated to cross a number of watercourses. The final number of watercourse crossings will be determined during final design. Prior to construction, the RoWs will be surveyed and applicable permits obtained. - With the implementation of these mitigation measures, Project activities are not anticipated to result in substantive resource conflicts with water resources and the aquatic environment.
Fish habitat may be altered or lost as a result of construction of watercourse crossings.	X	-	-		
Blasting and associated noise near watercourses or waterbodies has the potential to result in injury or mortality of fish or SAR.	X	-	-		
If a mobile concrete batch plant is required, wastewater generated during batching activities could negatively affect fish and fish habitat.					
Increased heavy traffic on existing roads and other site preparation activities, as well as the operation and maintenance of the wind farm, may increase and continue to cause sediment runoff from access roads into existing water crossings and nearby waterbodies, particularly Trout Pond, which could affect water quality and quantity and the aquatic environment, including fish and SAR.	-	X	-		

Table 5.15 Water Resources and Aquatic Environment Potential Resource Conflicts

Potential Resources Conflict	Project Phase			Mitigation Measures	Considerations
	C	O	D		
				• Use of explosives in or near water will be avoided, however, if required, CBPPL will conduct blasting in accordance with DFO Guidelines for the Use of Explosives In or Near Canadian Fisheries Waters. • Should an onsite borrow pit or quarry be required for road construction, the following measures will be implemented (Kruger Industrial 2024): – Where borrow pit or quarry activity is likely to cause sediment, laden runoff to contaminate a waterbody, sediment control measures such as filter fabric berms or sedimentation ponds will be installed. – Overburden or grubbed material pushed off a gravel pit site will be retained in a manner that allows it to be pushed back into the pit after construction and spread in a neat and tidy fashion. – Aggregate will be sourced from existing pits to the extent practicable, with new pit development limited to circumstances where additional material is required. Borrow pits will be located at least 60 m from the nearest waterbody. – If quarries are to be constructed in or near water, the CBPPL will submit a Request for Review to DFO for these works.	

5.2.3 Vegetation and Wetlands (including Rare Plants)

Vegetation and wetlands are necessary to maintain natural ecosystems and provide important social, cultural, aesthetic, recreational, and economic value. Interactions with vegetation and wetlands related to the wind farm are primarily associated with site preparation and construction and may include localized vegetation clearing, soil disturbance, temporary changes to drainage, and the potential introduction of invasive species. These effects are expected to be largely confined to the wind farm footprint and immediately adjacent areas and are not anticipated to result in resource conflicts when standard mitigation and regulatory requirements are applied. The Wind Farm Site includes previously disturbed areas resulting from historical forestry activities and existing roads (i.e., an industrial forest). Wind farm infrastructure siting and design have emphasized the use of these previously disturbed areas to reduce new disturbance. As a result, wind farm activities will largely occur in an industrial forest rather than intact or high value vegetation or wetland ecosystems.

Direct effects on vegetation may include limited removal or alteration of common forest, shrub, and groundcover communities to accommodate access roads, infrastructure, and transmission corridors. Wetland interactions may occur at discrete crossings or where infrastructure overlaps wetland features. Indirect effects, such as minor changes to hydrology, dust deposition, and edge effects, may occur adjacent to construction areas and are expected to be temporary and most evident during the construction phase.

Resource and equipment transport during construction creates dust, which settles on nearby plants, covering their leaves and blocking stomata, reducing photosynthesis and potentially harming plant health (Farmer 1993). Dust may also change soil chemistry (Brown 2009), and when taken up by plants, it can lower their productivity or fitness, even leading to the loss of sensitive species that could affect community diversity (Hosker and Lindberg 1982). Most dust deposition and its effect on vegetation occurs within 125 m of unpaved roads (Walker and Everett 1987); however, it is conservatively assumed that edge effects might reach out as far as 200 m from access roads in the Wind Farm Site. Planned dust suppression strategies will be implemented to limit these effects.

Edge effects from clearing adjacent areas may alter community composition but are unlikely to cause major shifts in community diversity, except where invasive plant species are introduced (Harper et al. 2005; Harper et al. 2015). Invasive species, potentially spread by Project-related activities, can outcompete native plants and change community types, especially along access roads up to 1 km into undisturbed habitats (Sieg et al. 2003; Henderson 2011; Vakhlamova et al. 2016). Although mitigation measures will reduce the spread of invasive plants, most non-native species are expected to establish primarily in disturbed areas and roadside ditches rather than altering overall community types.

Rare plants and SAR have the potential to occur within the broader region; however, interactions with these resources are not anticipated. This determination reflects avoidance-based siting, preliminary desktop screening, and commitment to pre-construction site assessments. As discussed in Section 3.3, fieldwork will be undertaken within the footprint of planned WTG locations and the transmission line RoW to characterize plant communities, identify rare or sensitive species, and assess habitat quality. These surveys will focus on vascular plant SAR and SOCC and will confirm the presence or absence of sensitive features. Study results will support field identification and inform micro-siting refinements to WTG and

infrastructure placement to avoid important ecological features and limit habitat disturbance where necessary. Where avoidance is not feasible, additional mitigation and regulatory consultation would be implemented in accordance with applicable requirements.

At the current stage of the wind farm design, the final development footprint has not been confirmed; therefore, the extent of habitat loss, including wetlands, cannot be quantitatively defined. This information will be provided to applicable regulators once detailed design and final siting have been completed. Notwithstanding, the location of wetlands is being considered during the WTG siting process. The placement of WTG infrastructure and the routing of new access roads will be designed, to the extent practicable, to avoid or limit interactions with wetlands. Where wetland interactions are unavoidable (e.g., for road crossings), appropriate mitigation measures will be implemented in accordance with standard best management practices, including erosion and sediment control measures and the installation of appropriately sized culverts to maintain natural drainage.

Other mitigation measures will be applied throughout each Project phase to avoid or reduce effects on vegetation and wetlands. These measures include reducing new clearing through the use of existing disturbed areas, limiting disturbance to the smallest practicable footprint, maintaining appropriate buffers around wetlands and watercourses, implementing erosion and sediment controls, using low-impact construction methods in wet areas, preventing the introduction of invasive species, and promptly stabilizing and reclaiming temporarily disturbed areas.

During operation, effects on vegetation and wetlands are expected to be limited to routine maintenance within previously disturbed areas. No long-term alteration of wetland function or vegetation community structure is anticipated. Decommissioning would follow similar mitigation principles with an emphasis on reducing disturbance and restoring site conditions.

Table 5.16 provides potential resource conflicts from the Wind Farm Site on vegetation and wetlands (including rare plants) for each Project phase. It also outlines standard mitigation measures intended to avoid, reduce, or manage them. With the implementation of these mitigation measures, Wind Farm Site activities are not anticipated to result in substantive resource conflicts with vegetation and wetlands.

Table 5.16 Vegetation and Wetlands Potential Resource Conflicts

Potential Resources Conflict	Project Phase			Mitigation Measures	Considerations
	C	O	D		
Wind Farm Site activities (e.g., clearing and grubbing) may result in the loss of native vegetation communities, and potentially SAR and SOCC.	X	-	-	- Micro-siting of Project components to avoid sensitive vegetation and wetland features when practicable will reduce potential direct interactions between Project components or activities and wetlands and vegetation. - Project footprint and disturbed areas will be limited to the extent practicable. - Dust will be managed through measures such as speed control, water application for suppression during dry periods, and regular road maintenance. - Sensitive areas (e.g., wetlands, rare plant occurrences) identified through site assessments (Section 4.3) prior to Wind Farm Site activities will be flagged and appropriate buffers maintained around these areas to the extent practicable. Where site constraints are encountered, buffers will be adjusted in consultation with applicable regulatory requirements. - Crane pads will be constructed in the “High and Dry”, away from watercourses and wetlands when practical, with appropriate erosion and sedimentation control installed around each individual pad. - Site restoration activities will include reseeding and revegetation. - CBPPL will undertake reclamation monitoring to verify vegetation and land use is re-established following decommissioning and to confirm that the site has successfully been restored to pre-construction conditions. - Potential impacts to vegetation and wetlands (including rare plants) will be mitigated through the implementation of the EPP and other applicable plans identified in Table 3.1.	- The Wind Farm Site is located within CBPPL timber limits with some of it a previously harvested industrial forest that includes existing access roads. - Wind Farm Site infrastructure will be designed to use these existing disturbed features to the extent practicable, reducing the need for new land disturbance. - Targeted red pine and black ash surveys are planned prior to Project commencement. - With the implementation of these mitigation measures, Wind Farm Site activities are not anticipated to result in substantive resource conflicts with vegetation and wetlands.
Transporting resources and equipment may indirectly affect community and species diversity by increasing dust near access roads and spreading non-native invasive plants.	X	X	X		
Wind Farm Site activities (e.g., clearing and grubbing) may cause a loss of or change to wetland function and changes to hydrology.	X	-	X		
Site preparation and clearing activities may cause fragmentation of vegetation communities and increased edge effects.	X	-	-		

5.2.4 Birds and Bats (including SAR)

Birds provide important social, cultural, aesthetic, recreational, and economic value and are ecologically important (e.g., raptors function as top predators and use both terrestrial and freshwater habitats). Bats are also an ecologically important group and have the potential to be adversely affected by wind farms. There are several avian and bat SAR that may occur in the Corner Brook subregion and have the potential to occur in suitable habitat in the Wind Farm Site during biologically important seasons (e.g., migration and summer breeding) (Section 5.1.1), noting that the absence of confirmed records does not necessarily indicate absence, particularly where suitable habitat exists. As indicated in Section 3.3, field surveys for birds and bats were initiated (April 2026) within the Wind Farm Site to gather additional details on bird and bat presence. Planned studies for 2026 include spring and fall migration surveys, migratory breeding bird surveys, and winter bird surveys for birds, and acoustic monitoring for bats during migration (spring and fall) and summer breeding / roosting. Detail on the methods used during these 2026 studies are provided in Appendix K. Results of the studies will be used to inform potential future studies as well as the monitoring plan and mitigation measures to avoid adverse effects to migratory birds, SAR, and SOCC.

Project-related activities may interact with birds and bats through direct and indirect changes to their habitat, as well as direct and indirect effects on a change in mortality risk (e.g., collisions and barotrauma). These interactions can be particularly important for SAR, which may be more sensitive to such disturbances.

Direct changes to bird and bat habitat are anticipated to occur primarily during the construction phase when vegetation will be removed or altered to accommodate access roads (primarily upgrades to existing roads), infrastructure (e.g., WTG pads), and transmission corridors. These changes may also alter bird and bat movement patterns through habitat fragmentation and the creation of habitat edges (edge effects). In addition, the presence of WTGs may disrupt movement patterns or lead to temporary avoidance of an area. Indirect effects on habitat also include sensory disturbances such as noise, light, dust, vibrations, and visual effects, including human presence, and are anticipated to occur throughout all Project phases.

During Project construction, there is a potential for direct mortality of birds (including their nests, young, and/or eggs) and bats, primarily during site preparation activities (e.g., if a tree or snag containing a roost or nest is destroyed), as well as through increased collision risk with Project-related vehicles and equipment. To mitigate incidental mortality risk, these activities will be conducted outside of the migratory breeding bird season and bat maternity roosting period, to the greatest extent feasible. Where scheduling constraints arise, mitigation measures will be implemented to reduce potential effects.

During operation, the primary pathway for direct mortality is through strikes with WTG blades and barotrauma (i.e., rapid pressure changes experienced by bats near WTG blades, resulting in internal injury or hemorrhaging and increased mortality). There is also a low risk of bird collisions with Project-related vehicles and infrastructure (e.g., transmission lines). Indirect effects on mortality may result from increased hunting pressure (e.g., waterfowl, game birds) due to changes in access or altered predator-prey dynamics associated with habitat changes (e.g. via transmission corridors). These effects may occur throughout operation and decommissioning.

Standard mitigation measures will be part of the EPP for the Project and will serve to avoid or reduce potential direct and indirect effects on bird and bat habitat and mortality risk. These measures include, amongst others, limiting the extent of new clearing by prioritizing the use of existing disturbed areas, establishing and maintaining appropriate buffers around sensitive areas (e.g., nests, roosts, hibernacula), implementing dust suppression as needed (water or other approved suppressant), and operational measures such as modified cut-in speeds or WTG curtailment, as appropriate based on regulatory requirements. Lighting design guidance will be considered (e.g., International Commission on illumination or International Illuminating Engineering Society) and WTG lighting will meet the requirements for lights under the *Canadian Aviation Regulations*. Measures to manage Project-related sensory emissions (e.g., dust, noise, light) to acceptable levels for nearby receptors (as close as approximately 1,500 m; Section 5.2.1), will also benefit birds and bats.

Table 5.17 provides potential resource conflicts from the Wind Farm Site on birds and bats (including SAR) for each Project phase. Mitigation measures intended to avoid, reduce, or manage adverse effects to birds and bats are also described. These measures have been developed with consideration of SAR and SOCC. Where suitable habitat is present, it is conservatively assumed that these species may occur within the Wind Farm Site, even where presence has not been confirmed. Mitigation measures are informed by applicable recovery strategies, action plans and/or management plans, and are designed to avoid or reduce potential effects on individuals, residences, and critical habitat in accordance with SARA. As described in Section 3.2, a Bird and Bat Management Plan will be developed for monitoring birds (SAR and non-SAR), including migratory bird SAR. The Bird and Bat Management Plan will include a monitoring program for the operational phase of the Project, as well as an adaptive management framework that identifies thresholds and corresponding mitigation actions to be implemented, as required, to avoid or reduce adverse effects. Comparable mortality monitoring for bats, including carcass searches with defined thresholds and associated mitigation measures, will also be implemented during operations and will be described in the Bat Mitigation and Monitoring Plan (Section 3.2). With the implementation of these mitigation measures, wind farm activities are not anticipated to result in substantive resource conflicts with birds and bats (including SAR); however, some residual interactions may occur, including the potential for bird and bat mortality.

Table 5.17 Birds and Bats Potential Resource Conflicts

Potential Resources Conflict	Project Phase			Mitigation Measures	Considerations
	C	O	D		
Land clearing activities will result in a direct loss or alteration of bird and/or bat habitat, potentially including that of SAR.	X	-	-	- Wind Farm Site footprint and disturbed areas will be limited to the extent practicable. - Site restoration activities will include reseeded and revegetation. - Workers will avoid disturbing or harassing wildlife (including birds and bats), will yield to wildlife when encountered, and will adhere to a no-hunting policy at the Wind Farm Site. - Sensitive areas (e.g., nests, hibernacula, roosts) identified prior to Project activities will be flagged and appropriate buffers maintained around these areas. Where site constraints are encountered, buffers will be adjusted in consultation with applicable regulatory requirements. - Bird use of open areas, stockpiled materials, and other key Project locations will be monitored. If problematic bird use (i.e., nesting, burrowing) is observed, adaptive management measures (e.g., deterrents) may be used, in consultation with applicable regulatory requirements. - To the extent possible, clearing related activities will occur outside of sensitive timing windows (e.g., breeding / roosting and nesting seasons). - Observations of potential bat hibernacula, bat colonies, and sick or dead bats will be reported to the provincial Wildlife Division. - Dust will be managed through measures such as speed control, water application for suppression during dry periods, and regular road maintenance. - Project lighting will be limited to that necessary for safe and efficient Project activities and will be designed in accordance with recognized guidance. WTG lighting will meet the requirements for lights under the <i>Canadian Aviation Regulations</i>. - Blasting procedures will be prepared by the blasting contractor to outline procedures for the storage, handling, and use of explosives and their components at the Wind Farm Site. Procedures will address the safety of the public and Project personnel, as well as the protection of the environment and Project infrastructure. - An operational monitoring program for birds and bats will be established. - An adaptive management framework will be used to introduce new mitigation measures if warranted by the monitoring data collected and through consultations with regulators. - Mitigation measures, such as modified cut-in speeds maybe implemented based on regulatory requirements, as appropriate, to reduce bat mortality during periods of high potential bat interactions.	- The Wind Farm Site is located within a previously harvested industrial forest that includes existing access roads. - Four bird SAR were confirmed by AC CDC records within 15 km of the Wind Farm Site: olive-sided flycatcher, rusty blackbird, red crossbill, and gray-cheeked thrush. - Two hibernating (resident) bat SAR were confirmed by AC CDC records within 15 km of the Wind Farm Site: little brown myotis and northern myotis. There are also three migratory bat SAR (hoary bat, eastern red bat, and silver-haired bat) that may occur seasonally. - Field surveys to document birds and bats within the Wind Farm Site were initiated in April 2026, with results pending. Findings will inform future monitoring and management plans (Section 4.2). - Wind Farm Site infrastructure will be designed to use these existing disturbed features to the extent practicable, reducing the need for new land disturbance. - The wind farm will be designed to meet air and sound quality guidelines for nearby human receptors. These measures will also benefit birds and bats and other wildlife. - With the implementation of these mitigation measures, Wind Farm Site activities are not anticipated to result in substantive resource conflicts with birds and bats (including SAR), although some residual interactions may occur.
Land clearing activities can result in indirect effects on habitat, including habitat fragmentation and edge effects, as well as sensory disturbances (e.g., noise, light, dust, vibrations, odors, and human presence) that may reduce habitat suitability, may cause birds and/or bats to avoid or abandon habitat or other physiological effects.	X	X	X		
Cleared areas and stockpiled materials (e.g., vegetative debris and soil) may attract birds which could result in birds–construction interactions, including injury during material handling or disturbance to nesting species.	X	-	-		
Increased mortality may be caused by land clearing, vehicular collisions, wind WTG strikes or barotrauma, transmission line strikes, and collisions with other Project infrastructure. Migratory and tree-roosting species (e.g., hoary bat, eastern red bat, and silver-haired bat) in particular face increased WTG-related mortalities.	X	X	X		
Indirect mortality may result from increased or improved access, leading to higher harvest pressure for some species (e.g., game birds, waterfowl) and changes in predator-prey dynamics.	X	X	X		

5.2.5 Other Wildlife (including SAR)

Other wildlife herein includes large and small mammals and furbearers, including SAR (marten), as well as insect SAR (yellow-banded bumble bee) known to occur within the Wind Farm Site. These species are important to a range of interested parties, including Indigenous groups, local communities and businesses, and regulatory bodies, and contribute to ecosystem structure and function. Interactions from Project-related activities on other wildlife include direct and indirect changes to their habitat, as well as direct and indirect effects on a change in mortality risk.

Direct changes to habitat are anticipated to occur primarily during the construction phase and include the removal or alteration of vegetation to accommodate access roads (primarily upgrades to existing roads), infrastructure (e.g., WTG pads), and transmission corridors. These activities may alter wildlife movement patterns through habitat loss, fragmentation, and edge effects, and can adversely affect wildlife, including potentially caribou, by influencing migration and seasonal distributions. However, as an industrial forest, the area has a long history of disturbance, including a well-developed road network and series of cut blocks that are in varying stages of regeneration, and is naturally fragmented due in part to the complex topography in the area. Indirect effects on habitat include sensory disturbances such as noise, light, dust, vibrations, odors, and visual effects, including human presence, and are anticipated to occur throughout all Project phases. However, once the Project is operating, Project-related human activity and associated sensory disturbance is expected to decrease.

Potential direct effects on wildlife mortality include increased risk of collision with Project-related vehicles and during site preparation and infrastructure installation. These effects are expected to occur primarily during the construction phase, when approximately 260-275 loaded truckloads are anticipated from the Port of Corner Brook to the Wind Farm Site. Indirect effects on mortality may result from increased harvest pressure or altered predator-prey dynamics associated with increased access or following the loss or alteration of habitat. Linear features, such as roads and transmission corridors, can fragment habitat and create connectivity issues, while also potentially facilitating predator movement and improving human access, thereby potentially increasing harvesting pressure. These effects may occur throughout operations and decommissioning. Standard mitigation measures will be part of the Wind Farm's EPP and will serve to avoid or reduce potential direct and indirect effects on wildlife habitat and mortality risk. These measures include limiting the extent of new clearing by prioritizing the use of existing disturbed areas, avoiding and/or limiting the loss or alteration of critical habitat of Newfoundland marten, maintaining appropriate buffers around sensitive areas, and re-vegetating areas as soon as possible following construction. Other examples include implementing dust suppression as needed (water or other approved suppressant), consideration of lighting design guidance (e.g., International Commission on illumination or International Illuminating Engineering Society), enforcing a no hunting and no trapping policy for workers at the Wind Farm Site, and developing a Transportation Impact Study and Traffic Management Plan and WMP. Measures to manage Project-related sensory emissions (e.g., dust, noise, light) to acceptable levels for nearby human receptors (Section 5.2.1), will also benefit other wildlife.

Table 5.18 provides potential resource conflicts from the Wind Farm Site on other wildlife (including SAR) for each Project phase. It also outlines standard mitigation measures intended to avoid, reduce, or manage them. Mitigation measures are informed by applicable recovery strategies, action plans and/or management plans, and are designed to reduce potential effects on individuals, residences, and critical habitat in accordance with SARA. An Environmental Effects Monitoring Plan will be developed in consultation with the Wildlife Division prior to Project commencement which will discuss potential impacts and preventative measures, mitigation, and long-term monitoring for SAR (including birds, bats, insects) as well as other sensitive features. With the implementation of these mitigation measures, Wind Farm Site activities are not anticipated to result in substantive resource conflicts with other wildlife (including SAR).

Table 5.18 Other Wildlife Potential Resource Conflicts

Potential Resources Conflict	Project Phase			Mitigation Measures	Considerations
	C	O	D		
Land clearing activities (e.g., clearing and grubbing) will result in the direct loss or alteration of wildlife habitat. This can be particularly important for wildlife SAR which may be more sensitive to such disturbance or for species that have limited habitat ranges.	X	-	-	- Project footprint and disturbed areas will be limited to the extent practicable. - Site restoration activities will include reseedling and revegetation. - Workers will avoid disturbing or harassing wildlife (including birds and bats), will yield to wildlife when encountered, and will adhere to a no-hunting policy at the Wind Farm Site. - Sensitive areas (e.g., dens) identified prior to Project activities will be flagged and appropriate buffers maintained around these areas. Where site constraints are encountered, buffers will be adjusted in consultation with applicable regulatory requirements. - Measures to avoid land clearing during sensitive periods for birds and bats will also provide mitigation for other SAR. - Dust will be managed through measures such as speed control, water application for suppression during dry periods, and regular road maintenance. - Project lighting will be limited to that necessary for safe and efficient Project activities and will be designed in accordance with recognized guidance. WTG lighting will meet the requirements for lights under the <i>Canadian Aviation Regulations</i>. - To avoid attracting wildlife, wastes will be securely stored, frequently removed from site, and properly disposed of in an environmentally acceptable manner at an approved site. - An adaptive management framework will be used to introduce new mitigation measures if warranted by the monitoring data collected and through consultation with regulators.	- The Wind Farm Site is located within a previously harvested industrial forest that includes existing access roads. - Two wildlife SAR were documented by AC CDC records within 15 km of the Wind Farm Site: Newfoundland marten and yellow-banded bumble bee. - Newfoundland marten hair snag surveys are planned within suitable habitat proximate to the Wind Farm Site area. - Wind Farm Site infrastructure will be designed to use these existing disturbed features to the extent practicable, reducing the need for new land disturbance. - The Project will be designed to meet air and sound quality guidelines for nearby human. These measures will also benefit other wildlife. - With the implementation of these mitigation measures, Wind Farm Site activities are not anticipated to result in substantive resource conflicts with other wildlife (including SAR).
Land clearing activities can result in indirect effects on habitat, including fragmentation and edge effects, as well as sensory disturbances (e.g., noise, light, dust, vibrations, odors, and human presence) that may reduce habitat suitability, disrupt movement patterns (e.g., avoidance behaviours), or attract wildlife (e.g., via odors).	X	X	X		
Increased mortality may be caused by land clearing, vehicular collisions, and human-wildlife conflicts.	X	-	X		
Indirect mortality may result from increased or improved access, leading to higher harvest pressure and changes in predator-prey dynamics.	X	X	X		

5.2.6 Socio-Economic Environment and Historic Resources

The socio-economic environment includes a wide range of factors that influence the well-being and development of communities. This includes community services and infrastructure such as transportation networks, water and wastewater systems, emergency services, and recreational amenities, which contribute to the quality of life for residents. Employment and the economy includes job opportunities, workforce skills, local industries, and economic growth or stability. Collectively, these elements shape the social and economic landscape, affecting population trends, community health, and overall resilience.

Community services and infrastructure typically include permanent housing, temporary accommodations, transportation, local services and infrastructure, and safety and health care services and infrastructure. These services and infrastructure are used by residents and may be operated and maintained by municipal or provincial government authorities. Community services and infrastructure may be affected by additional demands arising from the workforce required for the construction of the wind farm and associated activities.

Potential interactions with infrastructure and services are most likely to occur during construction activities, such as the generation of domestic waste and the transportation of workers, vehicles, and equipment on local roads and highways, which may have an effect on the capacity and condition of nearby infrastructure and public services. Construction of the Wind Farm Site will directly employ 275 workers. A substantial amount of the labour force is anticipated to be from Newfoundland and Labrador; non-local workers may require temporary housing. The Corner Brook and Deer Lake areas have an established inventory of hotels, motels, and longer-term accommodation options that may support temporary workforce needs.

Construction will also result in increased traffic on local roads. As detailed in Section 3.3.1.1, approximately 260-275 loaded truckloads are anticipated from the Port of Corner Brook to the Wind Farm Site. Heavy machinery, delivery vehicles, and worker commutes can put pressure on existing roadways, resulting in congestion, wear, and a need for more frequent road maintenance. This increase in traffic may also result in road upgrades, such as resurfacing, widening, or reinforcing roadbeds, to safely accommodate the increased loads. These improvements, while initially intended for the wind farm, can leave a lasting benefit for the broader community by providing safer, stronger, and more reliable transportation infrastructure. CBPPL will upgrade existing access road infrastructure, as required, to accommodate transportation requirements. CBPPL will also, in consultation with NLDTI, develop a Traffic Management Plan.

As noted in Section 5.1.2.8.4, the Lady Slipper Resource Road near its intersection with the TCH falls within the Protected Road Zoning Area designated as RTE 1 – TCH Channel-Port aux Basques to Corner Brook. Activities within the protected road corridor are anticipated to be limited to the use and potential upgrading of existing access infrastructure in proximity to the highway, and no permanent infrastructure is proposed within the protected road setback area. Based on the current level of design, no land use conflicts have been identified with respect to the intent of the Protected Road Zoning Plan; however, this will be confirmed through detailed design and engagement with NLDTI. Should wind farm components be determined to conflict with protected road requirements, CBPPL will work with the Department to maintain compliance. CBPPL will apply for necessary development permits through the Government Service Centre and NLDTI, prior to the commencement of Project-related activities within the protected road area.

Potential effects on human health are expected to be limited and primarily associated with temporary changes in air quality from dust and equipment emissions, noise from construction equipment and blasting, increased traffic on local roads, and the potential for accidental releases to air, soil, or water. Based on the information provided in Sections 5.2.3 – 5.2.5, no substantial measurable adverse effects on the atmospheric environment, vegetation, or wildlife populations are anticipated. The wind farm footprint is limited and located within a managed landscape, and standard mitigation measures (e.g., environmental protection planning, erosion and sediment control, spill prevention and response procedures, and adherence to regulatory requirements) will be implemented to avoid or reduce potential environmental interactions. The Project is, therefore, not expected to result in measurable changes to human health. Potential pathways for contamination (e.g., accidental spills or release of contaminants to air, soil, or water) have been considered, and appropriate mitigation and response measures will be in place to reduce the likelihood and potential severity of such events. CBPPL has extensive experience developing and operating infrastructure within managed forest landscapes as part of its routine operations, including the construction of more than 70 km of forest access roads annually to support operations. Kruger Energy also has experience with wind farm development from operating wind farms in Ontario and Quebec. This experience informs the Wind Farm Site approach and supports the feasibility of developing and operating infrastructure associated with the wind farm while effectively managing potential environmental and socio-economic interactions. CBPPL will continue to engage with nearby receptors and local resource users regarding wind farm activities, including the communication of Project information, updates on ongoing and planned activities, a discussion of issues and concerns, and a potential means of addressing them through an Inquiry/Complaint Resolution Plan.

Employment and economy considers labour force conditions, employment levels, procurement activity, and spending within the local and regional economy, as well as expected benefits from Wind Farm Site employment. Construction of the wind farm is expected to have positive effects on employment and economy through the generation of up to 575 direct and indirect employment opportunities, creating short-term jobs for tradespersons, equipment operators, laborers, technicians, engineers, and project management staff. As described in Section 3.4.1, the majority of direct Project workers are anticipated to be hired from within NL. Additionally, CBPPL will support the training and development of local individuals and members of equity seeking groups. Equity seeking groups may include women, Indigenous People, visible minorities and racialized communities, and persons with disabilities. Agreements and programs will be established in partnership with regional organizations to provide skills training, apprenticeships, and professional development opportunities. These initiatives will enhance the participation of local and equity seeking groups in the workforce.

CBPPL is committed to maintaining a safe, inclusive, and respectful workplace and has established corporate policies, including a Drugs and Alcohol Policy and a Respectful Workplace Policy, that apply across its operations (Appendix R). CBPPL conduct Respectful Workplace training on a three year refresher cycle to remind employees of the importance of diversity and inclusion in the workplace. CBPPL is also committed to gender equity, dedicated to providing fair opportunities for applicants, and will implement a formal gender equity policy that supports equal pay, advancement, and representation throughout the organization. CBPPL is an equal opportunity employer in each sector of its operation. It encourages and support the growth of women within the organization in many ways including identifying women for succession roles, and providing equal opportunity in job competitions. Roles that are posted externally are advertised on the website, and on indeed.ca. For speciality positions CBPPL often will post

on websites associated with professional organizations such as CPA, as well as alumni groups within CNA and Memorial University.

Construction activity will require substantial procurement of materials, equipment, and specialized services, generating economic opportunities for regional suppliers such as fabricators, transport and logistics firms, construction contractors, environmental and engineering consultants, industrial service providers, and local retail and equipment vendors. Project-related spending on accommodations, fuel, food services, maintenance, and other local goods and services will further stimulate the regional economy throughout the construction period.

Once the wind farm is operational, effects on transportation, housing, and local infrastructure are anticipated to be negligible with only occasional increases in vehicle activity for maintenance and safety checks. As the Project moves into decommissioning, employment will decline as expected, but workers' enhanced skills may support future job opportunities in the region and province. The departure of non-local workers will further reduce demand on community services, and a Decommissioning and Rehabilitation Plan (Section 3.2) will be created with local authorities to address waste management and the removal of infrastructure and equipment.

Wind Farm Site activities have the potential to interact with historic resources. These resources include sites, materials, and, in some cases, landscapes or places of archaeological, cultural/spiritual, paleontological, or architectural significance from pre-contact, historic, or contemporary periods. Project activities have the potential to disturb both known and previously unidentified historic resources, particularly through ground-disturbing activities such as excavation, blasting, and road or site development. To mitigate potential resource conflicts, a Stage 1 Historic Resources Overview Assessment will be completed pre-construction in accordance with Provincial Archaeology Office requirements. The results of this assessment will inform Project planning and identify areas of elevated potential and, if required, follow up field investigations (e.g., Stage 2 assessment) will be undertaken as necessary to avoid or reduce impacts to historic resources.

Table 5.19 identifies potential resource conflicts from the Wind Farm Site on socio-economic environment and historic resources for each Project phase and outlines standard mitigation measures intended to avoid, reduce, or manage potential conflicts. With the implementation of these mitigation measures, Wind Farm Site activities are not anticipated to result in substantive resource conflicts with socio-economic resources.

Table 5.19 Socio-Economic Environment Potential Resource Conflicts

Potential Resources Conflict	Project Phase			Mitigation Measures	Considerations
	C	O	D		
Non-resident workers may increase demand for housing, temporary accommodation, community services like health and emergency care, and transportation infrastructure.	X	-	X	- CBPPL will communicate employment information to local communities and Indigenous groups in a timely manner and will develop procurement packages with consideration of the capacity and capabilities of local and regional Indigenous and non-Indigenous businesses. - Project purchasing requirements will be posted in a timely manner so that local and regional businesses can position themselves to compete to supply goods and services needed for Project construction, operations, and decommissioning. - CBPPL will develop and implement a gender equity policy that supports equal pay, advancement, and representation throughout the organization. - CBPPL will develop and implement a Traffic Management Plan. - CBPPL's ERP will describe emergency response measures, training requirements, roles and responsibilities, and contact and reporting procedures in the event of a fire at, or near, the Project Area. - Project staff and contractors will adhere to the waste management procedures to be included in the EPP and the WMP. - Construction activities will be coordinated to reduce, when practical, disruption during hunting season. - CBPPL will continue to engage with nearby receptors and local resource users regarding wind farm activities, including the communication of Project information, updates on ongoing and planned activities, a discussion of issues and concerns, and a potential means of addressing them through an Inquiry/Complaint Resolution Plan (see Section 3.2).	- Construction of the Wind Farm Site will require upgrading existing roads, as well as the creation of new access roads to support the construction and maintenance of the WTGs. - With the implementation of these mitigation measures, Wind Farm Site activities are not anticipated to result in substantive resource conflicts with communities.
Project activities, such as the generation of domestic waste and the transportation of workers, vehicles, and equipment on local roads and highways, may have an effect on the capacity and condition of nearby infrastructure and public services.	X	X	X		
The Project's demand for qualified labour may affect the regional labour supply and existing wage levels, as may the loss of Project employment following completion of decommissioning, rehabilitation and closure of the Project.	X	X	X		
The Project may affect regional businesses as it may provide future business development opportunities and contribute to increased competition for the local / regional labour supply and wage inflation.	X	X	X		
Project employment and spending may affect the local and provincial economy in a positive manner during the construction and loss of Project employment and spending will cease once decommissioning is complete.	X	-	X		
Project employment and spending may affect the local and provincial economy in a positive manner during the construction and operation phases and loss of Project employment and spending will cease once decommissioning is complete.	X	X	X		

Table 5.19 Socio-Economic Environment Potential Resource Conflicts

Potential Resources Conflict	Project Phase			Mitigation Measures	Considerations
	C	O	D		
Construction activities may result in the disturbance or loss of historic resources.	X	-	-	- A Stage 1 Historic Resources Overview Assessment will be completed pre-construction in accordance with Provincial Archaeology Office requirements (Section 4.3). - Ground disturbing activities not to occur within 50 m of identified archaeological sites. - When an archaeological site or artifact is found, the <i>Historic Resources Act</i> requires that development temporarily cease in the area and the discovery be reported to the Provincial Archaeology Office at (709) 729-2462. The Provincial Archaeology Office will respond immediately and will have assessment requirements and mitigation measures.	- The Wind Farm Site is located within a previously harvested industrial forest that includes existing access roads. - With the implementation of these mitigation measures, Wind Farm Site activities are not anticipated to result in substantive resource conflicts with historic resources.

5.2.7 Land and Resource Use

The Wind Farm Site is located within an actively managed forest landscape that supports a variety of land and resource uses, including forestry operations, recreational and subsistence activities, outfitting, and the use of private cabins and recreational properties. The area is characterized by an extensive network of existing forestry roads and access trails that provide access to timber resources, hunting and fishing areas, and other recreational destinations. The Wind Farm Site also overlaps a small portion of Moose Management Area 7 (MMA 7) and is situated within a broader region that continues to support commercial, recreational, and resource use activities.

Potential interactions between the Project and land and resource use may occur during construction and operation as a result of site preparation activities, the development of WTGs, access roads, collector lines, and transmission infrastructure, and the ongoing presence of Project components. These interactions may include temporary changes to access, localized disturbances associated with noise and increased activity, visual changes to the landscape, and the conversion of land for Project infrastructure. For the purposes of this Registration, land users include individuals and groups using the area for forestry, hunting, fishing, outfitting, recreation, and other resource use activities, while human receptors refer to residences, cabins, and recreational properties assessed in relation to noise, visual effects, and shadow flicker. Mitigation measures have been incorporated into Project planning and design to avoid or reduce potential conflicts and maintain continued access to lands and resources where feasible.

As described in Section 3.3, CBPPL is conducting a Land and Resource Use Survey (Appendix L) to gather additional information on existing land and resource use within the Wind Farm Site and surrounding area, including hunting, fishing, outfitting, cabin use, trail use, and other recreational and resource use activities. Information collected through the survey will be used to support the environmental assessment, identify practical mitigation measures, inform Project design refinements where feasible, and contribute to the development of the Outfitter Environmental Effects Monitoring Plan.

The Wind Farm Site is located within a landscape that has been actively managed for forestry for several decades and is characterized by a well-developed network of existing forestry roads and access trails. Within a defined local study area encompassing the Wind Farm Site and surrounding access corridors, the existing road and trail network represents the primary means of access for resource users. Project activities will include the upgrade of a portion of these existing roads and the development of approximately 16 km of new access roads, resulting in a measurable but incremental increase in overall road density relative to current conditions. Given the existing level of forestry activity and established road access in the area, Project-related changes are expected to represent an incremental change to existing land and resource use conditions. As such, the Project is not introducing access into a previously undeveloped area, but rather modifying and expanding an established access network within an actively used industrial forest landscape.

Commercial and industrial resource use in the vicinity of the Wind Farm Site is dominated by forestry; however, conflicts with forestry operations are not anticipated, as activities will be managed in accordance with CBPPL's Five-Year Operating Plan (2024–2028) for Forest Management Planning Zone 6 (Districts 14 and 15). A small portion of the proposed transmission line RoW extends into the Corner Brook Municipal Boundary, where applicable regulatory and permitting requirements will be adhered to.

No mining exempt mineral lands or map-staked claims overlap proposed WTG locations and known quarry sites will be avoided through siting and design, further reducing the potential for conflicts with other commercial and industrial resource uses.

Recreational and subsistence land and resource use occurs in the broader region and include hunting, fishing, berry picking, hiking, and other forms of outdoor recreation (Kruger Industrial 2024). Wind Farm Site activities may result in disruptions to land users during construction, including temporary access restrictions, increased noise, and localized displacement from areas occupied by WTG infrastructure. During operation, potential effects may include the ongoing presence of infrastructure and associated sensory disturbance (e.g., visual changes and noise).

The Wind Farm Site overlaps a small portion of Moose Management Area 7 (MMA 7), which extends across a broad region between Grand Lake and the TCH. The overlap represents a minor proportion of the overall management area, and access to the wider MMA 7 will remain available through the extensive existing road network. While localized changes in access may occur within and immediately adjacent to the Wind Farm Site during construction, the overall availability of lands for hunting and other resource use within MMA 7 is not expected to be substantially affected. Mitigation measures will include maintaining access and reducing the spatial extent and duration of disturbance; where access constraints occur, measures will be implemented to limit disruption. CBPPL will communicate with land users regarding construction timing and activities and provide a mechanism for land users to raise access-related or operational concerns during key Project phases. No permanent restrictions on recreational and subsistence activities (e.g., hunting and fishing) are anticipated during operation, as continued access to the broader road network and surrounding resource-use areas is expected to remain available, except where restrictions are required for safety around Project infrastructure.

Outfitting operations represent an important land and resource use within the region and are known to occur at the Wind Farm Site. There is the potential for Project-related activities to affect outfitter access, availability of wildlife and fish resources, and overall client experience. Potential effects may include temporary changes in access due to construction activities, disturbance to wildlife from noise and increased human activity, and sensory impacts (e.g., visual presence and noise) that could influence the quality of outfitting experiences. To address these potential effects, CBPPL will develop and implement an Outfitter Environmental Effects Monitoring Plan, in consultation with affected outfitters and relevant organizations (e.g., the Newfoundland and Labrador Outfitters Association), prior to construction. The Plan will identify Project-specific interaction pathways with outfitting operations and include mitigation measures such as maintaining or coordinating access to key travel routes, scheduling construction activities to avoid peak outfitting seasons where feasible, implementing standard measures to manage noise and disturbance, and establishing clear communication protocols with affected outfitters. The Plan will also include monitoring during construction and early operation, or other key Project phases as appropriate, to evaluate the effectiveness of mitigation measures. Monitoring will include mechanisms for ongoing engagement, documentation of access or operational concerns, and adaptive management to implement additional mitigation, where warranted. The outcomes of the monitoring program will be used to inform Project activities and reduce potential adverse effects on outfitting operations.

Land within the Wind Farm Site is entirely within CBPPL timber limits and is not located near established communities. However, permanent and seasonal residences, cabins, and recreational properties are present within 5 km of the proposed WTGs and along the proposed access road and transmission corridors, with the nearest identified receptor located approximately 1,500 m from the closest WTG. The locations of identified receptors are further described in the Hatch Noise Assessment and Visual Impact and Shadow Flicker Assessment (Hatch 2026a, b; Appendices E and F).

Potential effects on nearby receptors related to visual impacts, noise, and shadow flicker were assessed by Hatch (Hatch 2026a, b, Appendices E and F), and the Wind Farm Site layout was refined to reduce effects on nearby receptors. Operational noise was assessed in accordance with Health Canada's *Guidance for Evaluating Human Health Impacts in Environmental Assessment: Noise* (Health Canada 2017), with results indicating that the assessed receptors remain below Health Canada's recommended threshold for a change in %HA⁵. While some receptors may have views of the WTGs under worst-case conditions, visibility is expected to be moderated by distance, topography, and existing vegetation. Visual simulations (i.e., photomontages) were completed from representative locations to assess potential visual effects on surrounding views; the results are provided in Appendix M (Hatch 2026c). Shadow flicker modelling predicted that the assessed receptors remain below the commonly accepted threshold of 30 hours per year and 30 minutes per day under worst-case scenarios, with realistic-case results substantially lower. Construction-related noise effects may occur at a limited number of receptors located near transportation routes due to increased truck traffic; however, these effects are expected to be localized and temporary. With the implementation of the mitigation measures outlined in Section 5.2.1, construction-related noise is expected to be reduced. Overall, substantial adverse effects on human receptors are not anticipated.

CBPPL acknowledges the presence of issued Crown land titles within and adjacent to the Wind Farm Site and has commenced engagement with potentially affected land users. A two-page Project Description (Appendix N) has been distributed to nearby cabin owners to provide information on the proposed activities, anticipated timelines, and opportunities for engagement. Information gathered through this process will be considered during planning to reduce potential conflicts with existing land uses and to maintain access to titled properties.

There are no provincial parks, park reserves, or designated and provisional ecological reserves within the Wind Farm Site, however, previously identified critical habitat of Newfoundland marten (adopted in the 2013 federal recovery strategy [Environment Canada 2013]) overlaps a portion of the Wind Farm Site (Figure 5.2). Trout Pond PPWSA is located adjacent to the existing RoW of the transmission line near Massey Drive in Corner Brook. Proposed activities within this area will be subject to regulatory review and approval and will be implemented in accordance with applicable requirements to protect water quality and supply.

⁵ %HA = Percent Highly Annoyed, a Health Canada-derived indicator used to estimate the proportion of individuals likely to be highly annoyed by environmental noise levels.

Table 5.20 identifies potential resource conflicts from the Wind Farm Site on land and resource use for each Project phase and outlines standard mitigation measures intended to avoid, reduce, or manage potential conflicts. Overall, given the existing level of disturbance and established access network within the Wind Farm Site, the short-term nature of construction activities, the availability of surrounding lands and alternate access routes for recreational and resource use, and the continued availability of the broader MMA 7 and regional landscape, Project-related effects on recreational and subsistence land and resource use are expected to be localized, temporary, and limited. With the implementation of these mitigation measures, Wind Farm Site activities are not anticipated to result in substantive resource conflicts with land and resource use.

Table 5.20 Land and Resource Use Potential Resource Conflicts

Potential Resources Conflict	Project Phase			Mitigation Measures	Considerations
	C	O	D		
Wind Farm Site activities may alter access routes and restrict or limit access affecting traditional, recreational, and commercial land use.	X	X	X	- Project footprint and disturbed areas will be limited to the extent practicable. - Engagement with interested parties (e.g., outfitters, forestry operators) has started and will continue throughout the Project to identify concerns and address potential conflicts (Section 2). - A Public Engagement and Participation Plan (Table 3.1) will be developed to guide engagement with interested parties. - Wind Farm Site activities will maintain or provide alternative access routes for traditional, recreational, and commercial land users if required and where feasible. - Clear signage will be installed to inform land users of active work zones, temporary restrictions, and localized safety setbacks around infrastructure. - Development and implementation of an Outfitters Environmental Effects Monitoring Plan as described in Section 3.2.	- Forestry activities within the Wind Farm Site will be managed in accordance with the Forest Management Planning Zone 6 (Districts 14 and 15) Five-Year Operating Plan (2024–2028). - Commercial and industrial land use in the vicinity of the Wind Farm Site is limited, consisting primarily of forestry operations, with no mining claims and a small number of adjacent quarry permits. - Trout Pond PPWSA adjacent with an existing transmission line RoW. - Outfitters may operate in the vicinity of the Wind Farm Site. - WTG infrastructure is not located near established communities but is in proximity to residences/seasonal dwellings, with the nearest located approximately 1,500 m from the closest WTG. - Results from the noise, visual, and shadow flicker assessments (Hatch 2026a, b, Appendices E and F) will inform Wind Farm Site design and support mitigation of potential resource conflicts with interested parties. - With the implementation of these mitigation measures, Wind Farm Site activities are not anticipated to result in substantive resource conflicts with land and resource use.
Wind Farm Site activities may disrupt hunting, fishing, and outfitting activities.	X	X	X		
Wind Farm Site development could reduce the quality or availability of land and resources for forestry, wildlife harvesting, and other uses.	X	X	X		
Wind Farm Site activities and infrastructure could change the visual character of the area, influencing outdoor recreation and tourism.	X	X	X		

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5.2.8 Summary of Potential Resource Conflicts

The discussion of potential resource conflicts associated with the proposed Wind Farm Site has considered interactions with the biophysical and socioeconomic environment. Based on the mitigation measures and scoping considerations identified in Section 5.2, potential resource conflicts are expected to be localized and manageable, provided that Wind Farm Site activities are carried out in accordance with identified mitigation measures, regulatory requirements, and standard best management practices.

CBPPL has extensive experience developing and operating infrastructure within managed forest landscapes as part of its routine operations, including the construction of more than 70 km of forest access roads annually to support operations. This experience informs the Wind Farm Site approach and supports the feasibility of developing and operating infrastructure associated with the wind farm while effectively managing potential environmental interactions and maintaining land-use values within forested environments.

CBPPL recognizes the importance of water resources and associated river and stream values, as well as other environmental and land-use considerations, as part of its day-to-day operations and routinely incorporates established, regulator-approved practices to manage potential interactions in a manner appropriate to site-specific conditions.

Throughout construction and operation of the Wind Farm Site, CBPPL will continue to apply avoidance-first siting, reduce disturbance, and implement the mitigation measures identified in this Environmental Registration, consistent with established operational practices. CBPPL also commits to undertaking pre-construction surveys, regulatory coordination, and adaptive management where warranted to refine understanding of site-specific conditions and manage potential resource conflicts. With the application of the mitigation measures described in this Environmental Registration and these commitments, the Wind Farm Site is not anticipated to result in substantial or unmanageable resource conflicts, and CBPPL will continue to work collaboratively with regulators to maintain environmental protection.

Appendix S summarizes CBPPL's commitments, including the mitigation measures, management plans, and field surveys identified in this Registration that will be implemented for the Project. In addition to these measures, mitigation identified throughout the EA process (i.e., conditions of release) will also be implemented.

6 Project-related Documents

This section identifies supporting documentation relevant to the proposed Project, including materials related to consultation and engagement, project planning and design, and technical assessments. These materials offer additional context in support of this Environmental Registration and demonstrate compliance with applicable regulatory requirements and best practices. These are attached as appendices to this Environmental Registration as outlined in Table 6.1.

Table 6.1 Studies and Supporting Information Appended to the Environmental Registration

Appendix #	Title
A	Forestry Modernization
B	Mill Site Updates
C	Hydro Power Updates
D	Manufacturer Datasheets
E	Visual Impact & Shadow Flicker Assessment
F	Noise Assessment
G	Kruger Environmental Policy
H	EPP Table of Contents
I	ERP Table of Contents
J	WMP Table of Contents
K	2026 Bird and Bat Study Methods
L	Land and Resource Use Survey
M	Visualization Study
N	Engagement Materials
O	Letters of Support
P	AC CDC Results
Q	Inventory of Streams and Waterbodies
R	CBPPL Policies
S	Table of Commitments

7 Funding

The capital expenditure for the Project is estimated to be CAD \$700 million, as discussed in Section 2.4.2. This preliminary estimate will be refined and optimized through ongoing detailed studies. The Project costs will be privately funded by Kruger.

8 Project Tuckamore Summary

Kruger and CBPPL are undertaking a revitalization initiative to modernize forestry operations, upgrade Mill Site infrastructure and processes, improve infrastructure at DLP and Watson's Brook, and develop a renewable energy source (i.e., wind farm). Together, these elements comprise Project Tuckamore (the Project). Each of these components are necessary for the overall revitalization of CBPPL's operations in western Newfoundland and collectively contribute to the future viability of operations. This ambitious Project builds on long established assets and leverages new innovations to sustain and diversify CBPPL's operations in western Newfoundland.

CBPPL has been operating in western Newfoundland since 1925 and is still an economic driver and the largest private employer in western Newfoundland. The Project, and CBPPL's overall operations, provides substantial employment benefits across multiple sectors, supporting both direct and indirect jobs throughout the region. By maintaining and expanding opportunities in forestry, Mill operations, hydro power, and wind energy, the Project contributes to job stability and growth for local workers and contractors. The Project will transition the Mill towards renewable energy and diversified paper production, enhancing operational sustainability and reducing reliance on traditional newsprint. It will protect over 1,000 direct jobs in the provincial forest sector, inject substantial investment into the local economy, and enable the Mill to repay its debt to the Newfoundland government. Additionally, the Project will supply reliable, firm energy to the provincial grid, strengthening the forestry and manufacturing sector in western Newfoundland for years to come.

CBPPL has implemented a robust EMS certified to ISO 14001, as well as the SFI® Forest Management Standard for forestry operations, which provides a structured framework for identifying, monitoring, and mitigating environmental effects, and complying with provincial planning requirements and environmental protection guidelines. Regular audits and continuous improvement initiatives sustain certification and drive further advances in environmental performance. CBPPL is contributing to the province's transition towards a more sustainable economy, aligning with Kruger's broader vision of achieving sustainable prosperity by balancing economic growth, environmental stewardship, and social responsibility.

As CBPPL has been operating for many years, forestry, Mill, and hydro power operations are subject to established permitting and approval processes, which facilitate compliance with applicable regulations. CBPPL is dedicated to collaborating with regulatory bodies to update and amend existing permits and approvals at the Mill Site, hydro sites, and across forestry operations. Continued engagement and cooperation with authorities will facilitate an efficient permitting process and verify that environmental and operational standards are consistently upheld. In collaboration with NL regulators, CBPPL will continue to promote sustainable resource management and responsible development throughout the life of the Project.

The Wind Farm Site is within CBPPL timber lease agreement and has been actively harvested for more than 20 years. As such, the Wind Farm Site is a change in purpose from an active industrial forest to an industrial renewable energy supply. The final layout and number of WTGs needed to meet the required installed capacity (up to 155 MW) will be reviewed with regulators and the public throughout CBPPL's design process. WTGs will be sited in accordance with industry best practices and informed by noise and shadow flicker assessments, with a current design target of 1,000 m from human receptors.

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CBPPL is committed to ongoing engagement, focused on maintaining open, ongoing communication with First Nations, stakeholders, regulators, and the public throughout the various Project phases.

Engagement activities will include targeted outreach to interested parties, and broader public information sharing as the Project advances. Engagement opportunities and methods will be adapted as needed to reflect emerging issues, stakeholder feedback, and evolving Project details.

9 Signature

A handwritten signature in blue ink, appearing to read 'DP', with a long, flowing tail extending to the right.

September 1, 2026

Date

Darren Pelley
Vice President Special Projects
Publication Papers
Kruger Inc.

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