



# **NAIN WIND MICRO-GRID PROJECT ENVIRONMENTAL MANAGEMENT AND PROTECTION PLAN**

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## Revision History

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## List of Acronyms and Abbreviations

|          |                                                                 |
|----------|-----------------------------------------------------------------|
| BESS     | battery energy storage system                                   |
| EA       | Environmental Assessment                                        |
| EEMP     | Environmental Effects Monitoring Plan                           |
| EMPP     | Environmental Management and Protection Plan                    |
| ERP      | Emergency Response Plan                                         |
| ha       | hectares                                                        |
| m        | metres                                                          |
| m/s      | metres per second                                               |
| NEPA     | Nunatsiavut Environmental Protection Act                        |
| NG       | Nunatsiavut Government                                          |
| NICG     | Nain Inuit Community Government                                 |
| NL       | Newfoundland and Labrador                                       |
| NL WD    | NL Wildlife Division (Dept. of Forestry, Agriculture and Lands) |
| PPWSA    | Protected Public Water Supply Area                              |
| RCMP     | Royal Canadian Mounted Police                                   |
| SAR IMMP | Species at Risk Impacts Mitigation and Monitoring Plan          |
| WTG      | Wind Turbine Generator                                          |
| °C       | Degrees Celsius                                                 |

## 1.0 Introduction

The proposed Nain Wind Micro-Grid Project (the Project) is a renewable energy initiative being developed by Natural Forces Development Limited Partnership (Natural Forces; the Proponent) in partnership with the Nunatsiavut Government (NG). The Project will be located in the community of Nunainguk (Nain) in the Province of Newfoundland and Labrador (the Province) in the Inuit region of Nunatsiavut. Nain is the northernmost incorporated settlement in Labrador, isolated by vast distances from electricity grids and relying on diesel power for energy production. The cost of electricity produced from diesel is relatively high compared to other parts of the Province that have access to hydroelectric power. Wind energy is a potential green solution for offsetting a large portion of the diesel generation; it is more environmentally friendly than other production systems, as it requires minimal disturbance to the land and no disturbance to the waters.

The Project has a small footprint (7.70 ha) within the Nain Inuit Community Government boundaries, consisting of two wind turbine generators (WTGs), foundations, crane pads, a single access road, a collector line system, and a battery energy storage system (BESS) connected to the grid. Existing roads will be utilized to reduce the overall Project footprint. Once commissioned, the Project will provide electricity to Nain for a projected 30 years, helping reduce demand for diesel power in the community and lowering greenhouse gas emissions.

### 1.1 Purpose and Scope

This Environmental Management and Protection Plan (EMPP) is applicable throughout the construction, operation, maintenance, and decommissioning phases of the Nain Micro-Grid Wind Project. This EMPP serves to guide Project staff, contractors, and subcontractors to avoid and/or minimize potential environmental impacts associated with the proposed Project. All works are to be undertaken in an environmentally safe and responsible manner, in accordance with this EMPP, the Nunatsiavut Government Environmental Registration Document for the Project and in compliance with all relevant provincial, federal, and municipal laws, bylaws and regulations.

This document combines the scopes of a Waste Management Plan and an Environmental and Safety Contingency Plan into one document, the Environmental Management and Protection Plan, as committed to in the EA and as required by the NL EAD in its conditions of release for the Project. Information on the protection measures required for Project resources (e.g., terrestrial habitat, wetlands) and the prevention and response measures required for potential environmental hazards (e.g., erosion, hazardous waste, fire) is provided in Sections 3.1 through 3.11. This EMPP is meant to be a living document and may be amended to incorporate new

protection measures and current best practices, in following with an adaptive management framework.

## 2.0 Description of the Initiative

The Nain Wind Micro-Grid Project aims to reduce community dependence on diesel power for electricity generation by supplementing it with wind turbine generation. The Project Area is illustrated in Figure 1. The Project footprint will comprise two wind turbines, foundations, crane pads, a single access road, a collector line system, a BESS, and a microgrid controller. Existing roads will be utilized as much as possible to reduce the overall Project footprint.

The following text provides an overview of the Project phases. Further details regarding the specifics of activities to occur throughout the life of the Project are provided in the Environmental Assessment Registration document (Reg. No. 2118).

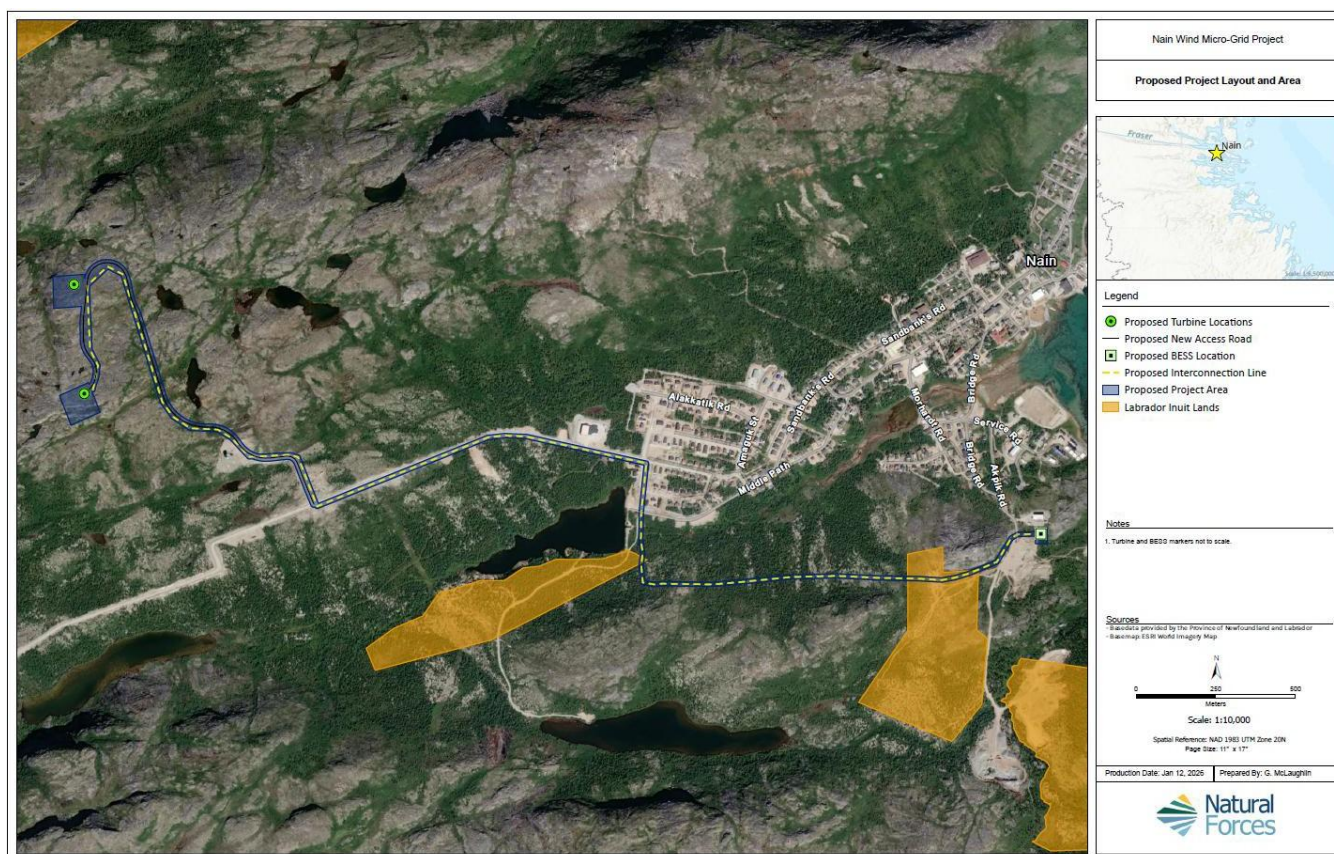


Figure 2.1 Map of the Project Area, depicting the turbine locations, access road, BESS, and interconnection line.

## 2.1 Project Schedule

The Project schedule is provided below, outlining activities from 2026 to 2028 (Table 1).

**Table 2.1 Proposed schedule for the Project.**

| Phase                                                                | Task                                                       | Estimated Start Date                                             |
|----------------------------------------------------------------------|------------------------------------------------------------|------------------------------------------------------------------|
| <b>Planning, Site Preparation and Construction, Site Restoration</b> | Clearing and Grubbing                                      | Q3 2026                                                          |
|                                                                      | Access Road and Laydown Area                               | Q3 2026                                                          |
|                                                                      | Crane Pad Construction                                     | Q2 2027                                                          |
|                                                                      | Turbine Foundation                                         | Q2 2027                                                          |
|                                                                      | Electrical Infrastructure                                  | Q2 2027                                                          |
|                                                                      | Turbine Installation                                       | Q3 2027                                                          |
|                                                                      | Commissioning                                              | Q1 2028                                                          |
|                                                                      | Removal of all temporary works and restoration of the site | Q3 2028                                                          |
| <b>Operation and Maintenance</b>                                     | Turbine Operation                                          | Q4 2027<br>(estimated duration 30 years following commissioning) |
|                                                                      | Inspection and Maintenance                                 |                                                                  |
| <b>Decommissioning, Infrastructure Removal and Site Reclamation</b>  |                                                            | Estimated 6 months before end of Operations.                     |

## 2.2 Construction

The proposed site for the two WTGs is a rocky hilltop just northwest of the community of Nain. Road access currently exists as far as the Nain water tower. An extension of this road will be constructed between the water tower and the two turbine site locations (Figure 1).

The WTGs will be ENERCON E82 E4 units. They have a rotor diameter of 82 m and a hub height of 59 m. These are direct-drive wind energy converters with a three-blade rotor, active pitch control, variable speed operation, and a nominal power output of 2,350 kW. Each unit will include the installation of a fan heater located near the blade flange to heat up the air inside the rotor blades to a maximum of 72°C, thereby preventing ice accumulation on the structures. A portable crane will be positioned on a custom pad and used to mount the turbine components.

Each turbine unit will comprise a tubular-shaped support tower, a nacelle which contains the generator, and three (3) rotor blades. Each turbine blade will attach to the central hub, which will be mounted in the nacelle. The surface clearing required for each turbine will be approximately 85 m by 100 m (0.85 ha), including the laydown and assembly areas but excluding the access road and distribution line. Linear components will include the 25 kV

ground-laid and underground distribution system, and the access road. The roadside collector network cables will not result in any additional clearing/grubbing.

Each wind turbine will be secured by a rock anchor foundation system suited to the specific geotechnical features of the Project Area. This system utilizes the local bedrock to support the structural forces of the turbine. Rock anchors are drilled into and bolted directly to the bedrock to provide maximum support and stability for the WTGs.

The 1.2 km new road segment will be constructed using local materials and finished with a gravel surface. While the drivable width will be 6 m, the addition of necessary side slopes and ditching will extend the total footprint to a width of 14 m. The Project footprint also includes a 9 m wide easement for electrical lines to be located along the access road extending from the two WTGs to the BESS (Figure 1), with an easement footprint of 4.32 ha. The footprint of each WTG site will cover 0.85 ha. In summary, the footprint of new infrastructure for the Project will be 1.68 hectares of new access road, 4.32 ha of easement, and 1.7 ha of turbine pads, for a total of 7.70 ha for the Project footprint.

A crane will be required for the assembly of the two turbines. Therefore, at each site and within the Project footprint, a crane pad will be established. As a measure to reduce the Project footprint, each pad will include space for the storage and assembly of the turbine components.

The electrical energy generated by each turbine will be transmitted from the nacelle into conductors in the support tower and connected to a unit transformer at the base of each turbine. These transformers will adjust the voltage of the power produced by the turbine to equal that of the electrical distribution grid existing within Nain. The site will utilize overhead power distribution lines to interconnect the turbines and deliver the 4.16 kV electrical energy to the community electrical grid via the BESS.

## 2.3 Operation and Maintenance

Once commissioned, the Project will provide electricity to Nain for a projected 30 years. The turbines will be controlled and monitored remotely using standard software. Regular maintenance activities will include:

- Road maintenance (grading and grooming) and civil maintenance (including ditches, culverts, crane hardstands);
- Wind turbine servicing, including inspection and maintenance, replacement of components, lubricants, and inspections of turbine blades;

- Facilities maintenance, including inspection, repair, or replacement of overhead collector circuit and associated interconnection equipment; and
- Vegetation management using mechanical control methods as required on access roads, crane hardstands, and below collector circuit.

Wind turbine operation will include provision for cut-out and storm control settings: Once the wind has reached a speed of 34 m/s with a 10-min mean, the turbine will pause generation until wind speed lowers to a safe level. When the wind reaches a speed of 28 m/s (for a 12-second mean), the storm control reduces the speed in linear fashion until it has dropped to the minimum storm speed or reached the cut-out wind speed.

## 2.4 Decommissioning and Rehabilitation

Decommissioning will occur at the end of the Project operational life. Activities will be similar in nature to the Construction phase, but of shorter duration and smaller spatial extent. The Project Waste Management Plan will be updated prior to commencement of decommissioning to ensure that Project infrastructure will be re-purposed, recycled or otherwise properly disposed. In addition, if there are benefits to the transfer of responsibility for elements like the access road, it may be practical to cede ownership to the town. Decommissioning will include:

- Removal of turbine blades, nacelles, and towers using a crane;
- Removal of above-ground electrical infrastructure and substation components;
- Partial or full removal of turbine foundations, depending on regulatory requirements and site conditions;
- Removal of access road surfacing where practicable;
- Site grading and stabilization; and
- Site rehabilitation and selected re-vegetation using native species.

Decommissioning activities will be temporary and localized to previously disturbed areas.

### 3.0 Environmental Protection Measures

Sections 3.1 to 3.6 detail the protection measures to be undertaken with respect to environmental resources within the affected area. Sections 3.7 and 3.8 serve as the Waste Management Plan for the Project. Sections 3.9 to 3.11 detail the environmental safety contingency measures to be implemented to prevent and respond to environmental issues and emergencies on site.

#### 3.1 Air Quality

A decrease in the ambient air quality in and around the Project Area can negatively affect communities, wildlife, and the environment. Changes to air quality associated with construction works typically includes increased fugitive dust (e.g., from earthworks) and particle emissions from point sources (e.g., vehicle exhaust). The mitigation measures listed in Table 3.1 have been designed to ensure that changes to air quality are minimized throughout the Project lifecycle.

**Table 3.1 Air Quality – Mitigation Measures.**

| Project Phase                 | Measures                                                                                                                                                                                                                                                                           |
|-------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| All phases                    | Vehicles and equipment will be maintained in proper working order.                                                                                                                                                                                                                 |
|                               | All vehicles and machinery will comply with current emission standards and will be used efficiently, minimizing distances travelled when possible.                                                                                                                                 |
|                               | Vehicle idling will be minimized, where possible.                                                                                                                                                                                                                                  |
|                               | Low-sulfur fuel will be used in combustion engines, when possible.                                                                                                                                                                                                                 |
|                               | Speed limits will be implemented and maintained on Project roads to prevent excess dust generation.                                                                                                                                                                                |
|                               | Fugitive dust during dry weather conditions (i.e., non-freezing weather conditions) will be controlled with the application of water, approved chemical suppressants, or physical barriers, where necessary.                                                                       |
| Construction, Decommissioning | During construction and decommissioning, the Project will require use of community roads for the transportation of wind turbine components. Dust suppressants will be applied to community roads as required, in following with Nain Inuit Community Government (NICG) guidelines. |
|                               | Contractor car-pooling will be encouraged.                                                                                                                                                                                                                                         |
|                               | When hauling materials that may emit dust, the load must either be covered or the vehicle must operate at reduced speeds to minimize fugitive dust emissions.                                                                                                                      |
|                               | Earth work activities will be paused, where possible, during periods of significant winds.                                                                                                                                                                                         |
|                               | If blasting is required, the blasting contractor will ensure that the blast design reduces dust emissions.                                                                                                                                                                         |
|                               | Stockpiles will be covered as necessary to prevent dust liftoff (see Section 3.9).                                                                                                                                                                                                 |

## 3.2 Noise and Vibration

Ambient noise will be elevated in the Project Area throughout the Project lifecycle, and may disturb nearby residents and wildlife. During the construction phase, noise and vibration will be produced through use of equipment and machinery for civil works (e.g., excavators, dump trucks, and bulldozers). Throughout the operations and maintenance phase, noise will be generated by the operation of wind turbines. To address this, the turbines were sited to minimize any potential effect on residences and local businesses closest to the Project, in addition to complying with industry setback standards. Further, a noise impact assessment study was completed to determine whether turbine noise would affect the community of Nain. The assessment determined that projected sound levels at all sensitive receptors are well below industry sound level thresholds. To mitigate the potential effects of noise and vibration, the measures listed in Table 3.2 will be implemented. In addition, should a community member have any concerns regarding noise emissions from the Project, they may contact the Proponent. Any complaints received will be addressed following the Complaint Resolution Plan (Appendix B).

**Table 3.2 Noise and Vibration – Mitigation Measures.**

| Project Phase                 | Measures                                                                                                                                                                                                                                                                                                                                        |
|-------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| All phases                    | Vehicles and equipment will be maintained in good working order, ensuring that mufflers are functional.                                                                                                                                                                                                                                         |
|                               | Where possible, use vehicles and equipment that do not generate excessive noise.                                                                                                                                                                                                                                                                |
|                               | The Proponent will provide direction to Nain residents on how to register community complaints about Project noise. Information will be provided in both English and Inuktitut.                                                                                                                                                                 |
| Construction, Decommissioning | Restrict high-noise activities to daytime hours when feasible, and plan to complete work by 11:00 pm.                                                                                                                                                                                                                                           |
|                               | Stationary equipment will be located away from sensitive receptors where feasible. Stationary equipment should be shielded to reduce noise transmission where possible.                                                                                                                                                                         |
|                               | If sensitive receptors are identified in the Project Area, they should be shielded from excessive noise where necessary.                                                                                                                                                                                                                        |
| Construction                  | If blasting is required, the blasting contractor will ensure that the blast design reduces shock and/or instantaneous peak noise levels, and that noise limits are not exceeded. The blasting contractor will ensure that the community is appropriately notified prior to blasting, and that notice is provided in both English and Inuktitut. |
|                               | Ensure that final wind turbine locations maintain planned setback distances between turbines and sensitive receptors (e.g., residences, businesses).                                                                                                                                                                                            |

### 3.3 Terrestrial Habitat and Wildlife

Terrestrial habitat and wildlife in the Project Area will be disturbed throughout the Project lifecycle. Construction activities (e.g., roads, crane pads) will fragment the surrounding environment, damage flora, and cause disturbance to a variety of species that utilize the area. The operation of wind turbines, while largely benign, may affect terrestrial wildlife. The mitigation measures outlined in Table 3.3 are designed to avoid or minimize disturbance to the greatest extent possible. In addition, an Environmental Effects Monitoring Plan (EEMP) and Species at Risk Impacts Mitigation and Monitoring Plan (SAR IMMP) have been developed to address the risk of Project interactions with bird and bat species, and outline mitigation and monitoring measures to avoid or reduce the effects of the Project on these species. These plans should be referred to for further information.

**Table 3.3 Terrestrial Habitat and Wildlife – Mitigation Measures.**

| Project Phase | Measures                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|---------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Construction  | Construction will follow the site plan, which has been designed to minimize the footprint of the Project. Existing access roads, trails, and previously disturbed areas are to be used wherever possible.                                                                                                                                                                                                                                                                                                                                  |
|               | Crane pads constructed for the Project will also serve as laydown and storage areas. They will be located on level ground and will adhere to the erosion and sedimentation prevention measures outlined in Section 3.9.                                                                                                                                                                                                                                                                                                                    |
|               | Areas scheduled for vegetation removal will be clearly marked in the field, and as little vegetation will be removed as possible. Vegetation clearing is not to take place in undesignated zones.                                                                                                                                                                                                                                                                                                                                          |
|               | If blasting is required, the area to be affected will be minimized to the extent feasible, and all activities will be undertaken in accordance with federal and provincial standards. Debris will be controlled using measures such as blast mats, and blasting will only take place where vegetation has been removed. A qualified biologist will search the affected area prior to blasting on the day that it is scheduled to occur. Should wildlife be observed, deterrence measures will be used to clear the area prior to blasting. |
|               | The Proponent will endeavor to conduct clearing and grubbing activities outside of the breeding bird season where possible and adhere to the Migratory Birds Convention Act. If vegetation removal is required between April 25 and August 15, a qualified biologist will be onsite to conduct monitoring and pre-clearing surveys. If an active bird nest is discovered, an appropriate buffer will be established for its protection, in consultation with NL WD.                                                                        |
|               | No vegetation clearing will occur within: <ul style="list-style-type: none"> <li>c) 800 metres of a bald eagle or osprey nest between March 15 and July 31; 200 metres during the remainder of the year.</li> <li>d) 800 meters of a short-eared owl (ground) nest between May 15 to August 15.</li> <li>e) 200 meters of any other raptor nests between March 15 and July 31.</li> </ul>                                                                                                                                                  |

| Project Phase             | Measures                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|---------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                           | The location of any raptor nest site will be reported to the Wildlife Division ( <a href="mailto:WildlifeReferrals@gov.nl.ca">WildlifeReferrals@gov.nl.ca</a> )                                                                                                                                                                                                                                                                                                                                                                                                                             |
|                           | During the bat roosting season, a qualified biologist will conduct pre-clearing surveys around any suitable trees to be cleared or rock structures to be blasted. If an active maternity roost is found, an appropriate buffer zone will be established for its protection, in consultation with NL WD.                                                                                                                                                                                                                                                                                     |
|                           | Interactions or conflicts between wildlife and site personnel will be reported to an environmental representative designated by the Proponent. Personnel are to avoid conflicts with wildlife and yield the right-of-way to wildlife on Project roads.                                                                                                                                                                                                                                                                                                                                      |
|                           | The site will be kept clear of leftover food to avoid attracting wildlife.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|                           | Should artificial lighting be required on site, it will be limited to what is necessary for safety and efficiency to minimize disturbance to wildlife.                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|                           | The NICG will be consulted to determine whether cleared timber and brush is of use to the community. When it is not destined for use by community members, cleared vegetation will be chipped and/or crushed and disposed of at the site. Disposal locations will be sited at least 30 m away from any waterbodies or wetlands.                                                                                                                                                                                                                                                             |
|                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| Operation and Maintenance | Only the minimum amount of pilot warning and obstruction avoidance lighting will be used, and lights will operate at the minimum intensity and number of flashes per minute allowable by Transport Canada. Lights with short flash durations and the ability to emit no light during the 'off phase' of the flash (i.e., as allowed by strobes and modern LED lights) will be installed on tall structures.                                                                                                                                                                                 |
|                           | Downward-facing lights will be installed where necessary along access roads and wind turbine bases.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|                           | Instruction will be given to wind turbine maintenance staff to ensure that all work lights are turned off upon leaving the site, particularly during inclement weather events.                                                                                                                                                                                                                                                                                                                                                                                                              |
|                           | Manual vegetation clearing (using equipment such as chain saws and brush saws) will take place within the collector line corridor at regular intervals (e.g., every 7 to 10 years) to ensure that vegetation does not interfere with electrical infrastructure.                                                                                                                                                                                                                                                                                                                             |
|                           | Interactions or conflicts between wildlife and site personnel will be reported to an environmental representative designated by the Proponent. Personnel are to avoid conflicts with wildlife and yield the right-of-way to wildlife on Project roads.                                                                                                                                                                                                                                                                                                                                      |
|                           | No vegetation clearing will occur within:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|                           | <p>c) 800 metres of a bald eagle or osprey nest between March 15 and July 31; 200 metres during the remainder of the year.</p> <p>d) 800 meters of a short-eared owl (ground) nest between May 15 to August 15.</p> <p>e) 200 meters of any other raptor nests between March 15 and July 31. The location of any raptor nest site will be reported to the Wildlife Division (<a href="mailto:WildlifeReferrals@gov.nl.ca">WildlifeReferrals@gov.nl.ca</a>) as well as the NG LNR group (<a href="mailto:environmentalreviews@nunatsiavut.com">environmentalreviews@nunatsiavut.com</a>)</p> |

| Project Phase   | Measures                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|-----------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                 | If deemed appropriate by the community, fencing will be constructed around new access roads and wind turbine sites to prevent unauthorized access to the Project Area by motor vehicles.                                                                                                                                                                                                                                                                                                                                                                                                          |
| Decommissioning | Decommissioning will seek to return the Project Area to its original state wherever feasible. Some of the ecotypes in the Project Area may not be conducive to replanting (e.g., alpine barrens dominated by slow-growing lichens). Where this is the case, Project infrastructure such as roads and concrete bases will be removed to the extent feasible, and the land underneath will be left to regenerate naturally. Where the Project Area interacts with forested areas (e.g., Black Spruce forest), the disturbed area may be revegetated with native plants and trees where practicable. |

### 3.4 Wetlands

Wetlands may be adversely affected during Project activities such as clearing, grubbing and excavation. The Project has been carefully designed to avoid wetland areas where possible, and the mitigation measures outlined in Table 3.4 will ensure that disturbance is reduced to the extent feasible. Section 3.7 of this EMPP addresses the prevention of erosion and sedimentation, and includes measures designed in consideration of reducing effects on wetlands. This section may be referred to for further information.

**Table 3.4 Wetlands – Mitigation Measures.**

| Project Phase                    | Measures                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|----------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Construction                     | Wetlands will be clearly marked in the field prior to the start of construction activities. Where practicable, a buffer of at least 30 m will be maintained around these areas. Where not practicable, corduroy or timber mats will be installed to allow for vehicle travel over wetlands while causing minimal damage. Road drainage will be managed to prevent sediment delivery to waterbodies, and disturbed areas will be stabilized following construction. Regular inspections will be conducted, and any erosion issues will be promptly repaired. |
|                                  | The design of the road will preserve natural drainage patterns and flows, where possible, and runoff will be diverted away from wetlands.                                                                                                                                                                                                                                                                                                                                                                                                                   |
| Construction,<br>Decommissioning | Vehicle and site maintenance, including refuelling, will take place at least 30 m away from wetlands.                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|                                  | Erosion and sedimentation control measures (see Section 3.9) will be implemented throughout construction and maintained until activities are complete.                                                                                                                                                                                                                                                                                                                                                                                                      |
|                                  | Stockpiled materials will be stored at least 30 m away from wetlands.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |

### 3.5 Water Resources

Waterbodies and watercourses proximal to the Project are identified in Figure 3.1. The extent of any potential alterations to water resources will be outlined following surveys and final civil

design, subject to change upon site conditions. The Project will be designed to minimize effects on hydrologic systems wherever possible, and preliminary plans have sought to avoid water resources altogether when siting Project infrastructure. The Trouser's Lake Protected Public Water Supply Area (PPWSA) will be avoided and buffered per regulatory requirements. In addition, the mitigation measures outlined in Table 3.5 will be followed to safeguard water resources within and surrounding the Project footprint.

While the residents of Nain indicated that there are no fish known to inhabit the small ponds present in the Project Area, and no fish were observed on site during field surveys, the Project will endeavour to follow Fisheries and Oceans Canada (DFO) legislation and guidance if conducting work in or near water.

The Proponent will obtain all necessary permits and authorizations prior to the start of construction, including a Section 48 permit under the Water Resources Act for any work that must take place within waterbodies or wetlands, shore zones, or infilling work within 15 m of a waterbody. It should also be stated that any permits that pertain to alternations of a body of water are not required by the province.

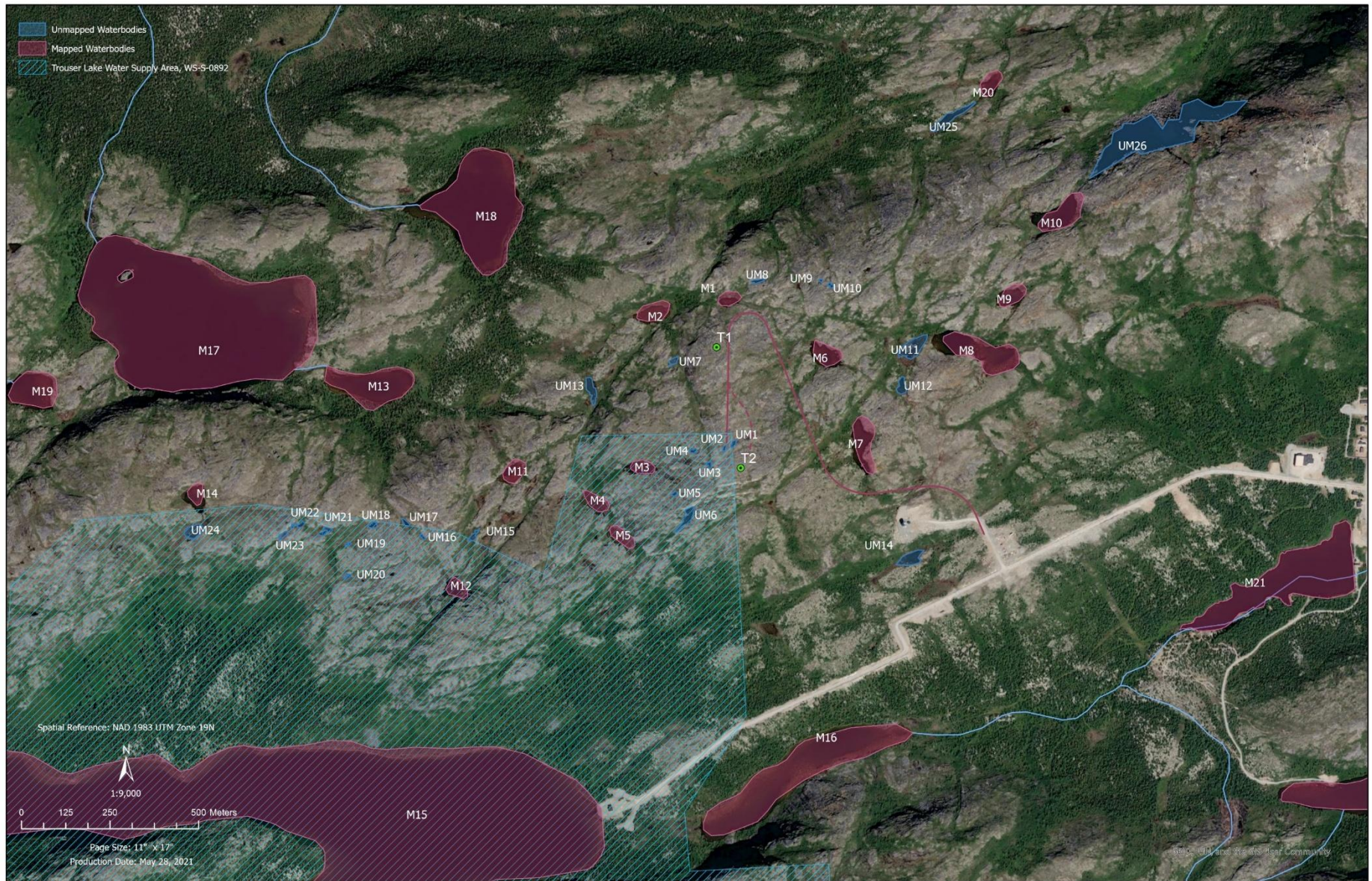


Figure 3.1 Mapped and Unmapped Waterbodies in Relation to Project Infrastructure and the Trouser Lake Water Supply.

**Table 3.5 Water Resources – Mitigation Measures.**

| Project Phase                    | Measures                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|----------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| All phases                       | A 30m buffer between site works and waterbodies will be maintained where feasible. Where it is not possible, permits will be sought, and appropriate erosion and sediment control measures (corduroy or timber mats) will be installed to allow for vehicle travel over wetlands. Road drainage will be managed to prevent sediment delivery to waterbodies, and disturbed areas will be stabilized following construction. Regular inspections will be conducted, and any erosion issues will be promptly repaired.                                                                 |
|                                  | If fording is required, personnel will follow DFO's code of practice for fording waterbodies (DFO, 2025). A Permit for Alterations to a Body of Water (Section 48 Permit) is not required by the Province for this activity.                                                                                                                                                                                                                                                                                                                                                         |
| Construction,<br>Decommissioning | The access road and collector line routes will be designed to avoid or minimize interference with watercourses, waterbodies or drainage channels.                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|                                  | The Proponent will ensure that any effluent or runoff leaving the site conforms to the requirements of the Environmental Control Water and Sewage Regulations, 2003.                                                                                                                                                                                                                                                                                                                                                                                                                 |
|                                  | The Trouser Lake Protected Public Water Supply Area (PPWSA) boundary will be clearly marked during construction and no activities will occur within this area. In addition, The Project will implement the following setback distances from any waterbody that connects to the Trouser Lake PPWSA: <ul style="list-style-type: none"> <li>• Intake pond or lake: 150 m</li> <li>• River intake: 150 m (for 1 km upstream and 100 m downstream)</li> <li>• Main river channel: 75 m</li> <li>• Major tributaries, lakes, or ponds: 50 m</li> <li>• Other waterbodies: 30 m</li> </ul> |
|                                  | Collector line poles may span across waterbodies and watercourses to reduce direct disturbance.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|                                  | Treated utility poles will not be used within the PPWSA or within the above listed buffer zones for waterbodies connected to the PPWSA.                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|                                  | Where necessary, diversion ditches will be constructed to isolate work areas from watercourses.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|                                  | Erosion and sedimentation control measures (see Section 3.9) will be implemented throughout construction and maintained until activities are complete.                                                                                                                                                                                                                                                                                                                                                                                                                               |
|                                  | If culverts are required, they will be constructed in accordance with DFO legislation and guidance documents.                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|                                  | During construction, if pumped water contains total suspended solids, the water will be pumped to vegetated or appropriate land with gentle slope to allow sediment to filter, or the water will be filtered before release with a filter bag. Displaced water will not be discharged into a waterbody, watercourse, or defined channel.                                                                                                                                                                                                                                             |

### 3.6 Archaeological Resources

Avoidance is the preferred method of mitigation in all instances where archaeological resources are present. While the Project Area has been ascribed low archaeological resource potential, the mitigation measures in Table 3.6 will be implemented to prevent any potential disturbance.

**Table 3.6 Archaeological Resources – Mitigation Measures.**

| Project Phase | Measures                                                                                                                                                                                                                                                                                                                                                                                                                           |
|---------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Construction  | If changes are made to the Project Area, proposed new areas shall be subjected to an Archaeological assessment.                                                                                                                                                                                                                                                                                                                    |
|               | If archaeological resources are encountered during construction activities associated with the Project, all work in the associated area(s) will be halted and immediate contact will be made with: <ul style="list-style-type: none"> <li>Nunatsiavut Government Archaeology/Heritage Division: <b>(709) 922-2942, ext. 240</b></li> <li>Newfoundland and Labrador Provincial Archaeology Office: <b>(709) 944-7345</b></li> </ul> |
|               | Workers and contractors working within 80 m of a watercourse will be advised of the higher potential for archaeological resources.                                                                                                                                                                                                                                                                                                 |
|               | If bones or human remains are found, work in the area will cease, and the RCMP shall be immediately notified.                                                                                                                                                                                                                                                                                                                      |
|               | Ground intrusive work activities will not exceed the predefined Project areas.                                                                                                                                                                                                                                                                                                                                                     |

### 3.7 Domestic Waste Management

Domestic waste is defined as non-hazardous wastes generated throughout all Project phases. This includes standard daily waste (e.g., paper, cardboard, plastics, food) and construction/decommissioning waste (e.g., scrap steel, cables, metals, and wood, and excess soils from cleared areas). Domestic waste poses the potential risk of polluting the environment, attracting wildlife, and being ingested by wildlife. The mitigation measures outlined in Table 3.7 seek to reduce the production of waste and ensure proper waste disposal.

**Table 3.7 Domestic Waste Management Mitigation Measures.**

| Project Phase                 | Measures                                                                                                                                                                                                                                                                                                                    |
|-------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Construction, Decommissioning | The waste holding zone for the Project is currently designated near the water tower. Domestic waste destined for final disposal will be temporarily stored at and collected from this location. Waste disposal areas, in accordance with regulatory guidelines, will be located away from rivers, watercourses or wetlands. |
|                               | Contractor(s) will ensure that the Project Area remains clear of waste, and that any waste generated is stored in the designated waste storage location. The collection and disposal of waste will be carried out at an appropriate frequency to keep pace with waste generation.                                           |
|                               | All waste bins will be kept securely closed, so as not to attract wildlife.                                                                                                                                                                                                                                                 |

| Project Phase              | Measures                                                                                                                                                                                                                                                                                                                                                                                             |
|----------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                            | Any materials that can be recycled in the community will be collected and recycled. The proceeds from any refundable recycling will be given to the community.                                                                                                                                                                                                                                       |
|                            | Non-combustible material, overburden and rock generated through Project activities will be used as fill material wherever possible, or otherwise made available to the community through the NICG. If it must be disposed of, it will be disposed of in designated, appropriate locations at least 30 m away from wetlands or waterbodies.                                                           |
|                            | Excess material that may be useful (e.g., timber, concrete) will be distributed to the NICG for their use or distribution to the community, where possible.                                                                                                                                                                                                                                          |
|                            | The temporary storage of any overburden, excess soil, and rock will follow the appropriate erosion and sedimentation control measures as outlined in Section 3.9.                                                                                                                                                                                                                                    |
|                            | The Proponent will consult with NICG to determine whether the community landfill may be used for the disposal of any Project domestic waste, and will follow the terms of any agreement that is made. If waste is to be shipped south for disposal, the Proponent will consult with the NICG to discuss cost-sharing measures and other efficiencies, such as community use of empty space on ships. |
| Operations and Maintenance | Any waste generated during maintenance activities will be removed from site and disposed of in consultation with the NICG.                                                                                                                                                                                                                                                                           |
| Decommissioning            | Wherever possible, wind turbine components (e.g., scrap metals, electronics) will be recycled. Wind turbine components will be shipped south for recycling or final disposal.                                                                                                                                                                                                                        |

### 3.8 Hazardous Waste Management

Mismanagement of hazardous wastes poses a risk to the health and safety of employees and the environment. Possible hazardous wastes generated by activities on site include waste fuel, lubricants, oils, concrete, paint, solvents, hydraulic fluids, and sewage. Hazardous wastes will be properly managed to minimize the risk of chronic and/or accidental releases. The mitigation measures listed in Table 3.8 will be implemented to ensure that hazardous wastes are managed and disposed of properly.

**Table 3.8 Hazardous Waste Management – Mitigation Measures.**

| Project Phase | Measures                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|---------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| All phases    | <p>While cured concrete is considered domestic waste, fresh concrete, cement, and associated wash water can negatively affect aquatic resources. The following measures will be implemented:</p> <ul style="list-style-type: none"> <li>Washing tools/equipment after concrete works shall be undertaken in specified areas at least 30 m away from water bodies or wetlands. No toxic chemicals will be used to wash tools/equipment.</li> <li>If works involving cement and fresh concrete are to take place within 30 m of a waterbody or wetland, neither product is to interact directly with the water.</li> </ul> |

| Project Phase | Measures                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|---------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|               | Hazardous waste will not be disposed of in Nain, but rather will be shipped south to an approved facility for final disposal. The Proponent will consult with the NICG to discuss cost-sharing measures and other efficiencies, such as community use of empty space on ships.                                                                                                                                                                                                   |
|               | Nain currently places all hazardous wastes in a holding area at the garage and ships it out of the community at the end of each shipping season. If approved by the NICG, this resource will be used within reason, but Project use will not exceed capacity or impede community use. Prior to shipping hazardous wastes, the necessary shipping documents will be prepared in accordance with provincial and federal regulations (e.g., Transportation of Dangerous Goods Act). |
|               | If hazardous waste must be temporarily stored on site, it will be stored in appropriate, labelled containers below eye level. Waste storage will follow the spill prevention measures listed in Section 3.10.                                                                                                                                                                                                                                                                    |
|               | Any site personnel handling hazardous waste must be certified under the national Workplace Hazardous Materials Information System (WHMIS).                                                                                                                                                                                                                                                                                                                                       |
|               | If portable toilets are required, they will be located at least 30 m away from any watercourses, wetlands or environmentally sensitive areas, and will be secured so that they do not tip over. Sewage will be disposed of at a regular interval, at an appropriate site in consultation with the NICG.                                                                                                                                                                          |

### 3.9 Erosion and Sedimentation Control

Erosion occurs when soil masses wear away or are detached by some force (e.g., water, wind, gravity). Construction and other activities can cause erosion to occur in a rapid, potentially dangerous or environmentally harmful manner (e.g., via impacts to fish and fish habitat). Sedimentation occurs when eroded soil particles travel, settle, and are deposited in water, creating a build-up of sediment. Proper erosion and sedimentation control measures are necessary to prevent or minimize soil movement and sedimentation in waterbodies. The measures listed in Table 3.9 will be implemented during Project activities to avoid or minimize safety hazards and potential negative environmental effects. In addition, an erosion risk engineering assessment report will be produced prior to Project construction.

**Table 3.9 Erosion and Sedimentation Control Measures.**

| Project Phase                                | Measures                                                                                                                                                                                                                                                                                                                        |
|----------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Construction, Operation, and Decommissioning | Proper erosion and sedimentation control measures will be installed prior to commencement of construction and inspected regularly during all phases of the project and prior to, and after, storm events to ensure they are continuing to operate properly.                                                                     |
|                                              | Damaged erosion and sediment control measures will be repaired as soon as possible. Sediment-laden water will be managed during all project phases by pumping or diverting it to vegetated areas, settling basins, or filtration systems. Adherence to DFO's national guidance on the implementation of an erosion and sediment |

| Project Phase | Measures                                                                                                                                                                                                                                                                                                                                                                     |
|---------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|               | control plan ( <a href="https://www.dfo-mpo.gc.ca/pnw-ppe/standards-normes/erosion-sediment-eng.html">https://www.dfo-mpo.gc.ca/pnw-ppe/standards-normes/erosion-sediment-eng.html</a> ) will minimize the risk of sedimentation.                                                                                                                                            |
|               | A plan for handling fill and construction materials for the site will be communicated to contractors (i.e., if stockpiling is required, materials will be stored away from any watercourse or removed from site to a predetermined location) with an intent to minimize the amount of soil stockpiled, and the duration that soil is stockpiled at the site.                 |
|               | Fill and excavated materials will not be stockpiled for extended periods of time to reduce the likelihood of sedimentation. Stockpiles will be covered if left standing for more than 24 hours.                                                                                                                                                                              |
|               | Weather will be monitored and additional erosion control measures such as the installation of check dams/silt fences will be employed, as appropriate, should stockpiled fill be present during unexpected heavy rain events.                                                                                                                                                |
|               | If any topsoil stockpiles are stored on site, they will be protected from precipitation tarps, and additional control measures (e.g., mats, nets, silt fences) will be implemented as necessary.                                                                                                                                                                             |
|               | Areas susceptible to erosion and exposed soils will be stabilized as soon as practical.                                                                                                                                                                                                                                                                                      |
|               | Excavations will be timed with weather forecasts to minimize open excavations during wet periods to extent possible. Work will not be conducted during heavy rain events to minimize the movement of exposed soils.                                                                                                                                                          |
|               | Culverts and ditches will be aligned to follow existing natural drainage. Ditches will be designed to take off water at low velocities and redirect it to vegetated areas. Outflows from ditches must cross dispersion berms at ~1% grade to keep flow slow. Additional measures (e.g., silt fences) will be implemented as necessary to provide a barrier to silt movement. |
|               | Culvert outflows will feed into stone rip rap aprons at shallow grades to minimize erosion. Existing culvert passages will be maintained.                                                                                                                                                                                                                                    |
|               | Silt fencing is to be employed along the edge of excavations in areas where onward drainage is possible.                                                                                                                                                                                                                                                                     |
|               | Slope grades will be minimized during construction. Unprotected cut of fill slopes will be stabilized by gravel or geo-textile fabric if they are deemed likely to erode.                                                                                                                                                                                                    |
|               | Accumulated sediment will be cleaned out of excavation and ditches at regular intervals after heavy rain falls during construction.                                                                                                                                                                                                                                          |

### 3.10 Spill Prevention and Response

Hazardous materials (e.g., fuels, lubricants, hydraulic oil) will be properly managed to minimize the risk of chronic and/or accidental releases, which may endanger site personnel and the environment. The spill prevention and response measures to be followed during all Project phases are listed in Table 3.10.

**Table 3.10 Spill Prevention and Response – Mitigation Measures.**

| Project Phase | Measures                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|---------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| All phases    | Equipment and machinery will be kept in good working order and maintained to reduce the risk of spills/leaks. Fuel and hydraulic systems on all equipment will be inspected regularly to ensure that there are no leaks. All leaks discovered will be repaired as soon as possible.                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|               | Routine maintenance, refueling and inspection of mobile machinery shall be performed off-site whenever possible. If required on site, these activities will be completed in designated areas located at least 30 m away from any waterbody, watercourse, or wetland. Containment measures (such as the use of impervious tarps beneath equipment) shall be used to ensure that hazardous materials do not interact with the environment.                                                                                                                                                                                                                                                                                                          |
|               | Spill response kits must accompany each piece of heavy equipment/machinery, and there will be adequate supplies in each kit to address the worst-case scenario in which a spill could occur on the ground, in surface water or in groundwater.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|               | A five (5) gallon disposal bag spill kit will contain the following: <ul style="list-style-type: none"> <li>• (10) 15 x 19" Pads</li> <li>• (2) 3" x 4' Sorbent Socks</li> <li>• (1) pair Nitrile Gloves</li> <li>• (1) Disposal Bag</li> </ul> Note: Spill trays will be located on site as well in case of a spill.                                                                                                                                                                                                                                                                                                                                                                                                                             |
|               | All potentially hazardous materials present on site will be handled, labeled, and stored responsibly. Chemical and petroleum hydrocarbons will be stored in appropriate containers in designated areas, at least 30 m away from waterbodies, watercourses, and wetlands. Secondary containment, such as the use of berms, will be employed where necessary.                                                                                                                                                                                                                                                                                                                                                                                       |
|               | If a spill is discovered, nearby work is to be stopped immediately, and those in the vicinity are to be informed. The following steps are then to be taken: <ul style="list-style-type: none"> <li>• All work within the vicinity of the spill is to be stopped immediately, and those working nearby are to be informed;</li> <li>• The site manager is to be informed;</li> <li>• The spill substance and source will be located;</li> <li>• If it is applicable and safe to do so, attempts to stop the spill source will be made;</li> <li>• Efforts will be made to contain the spill;</li> <li>• Access to the spill site will be restricted;</li> <li>• The spill will be reported to the proper authorities and the Proponent.</li> </ul> |
|               | The authorities to be notified in the event of a spill are as below: <ul style="list-style-type: none"> <li>• If a spill occurs on land, the occurrence will be reported to the Government of NL Environmental Emergency line at <b>1-800-563-9089</b> or <b>709-772-2083</b>.</li> <li>• If a spill occurs in or near a body of water, the occurrence will be reported to the Canadian Coast Guard environmental emergencies reporting system at <b>1-800-565-1633</b> or the Goose Bay branch at <b>1-709-896-2252</b>.</li> </ul>                                                                                                                                                                                                              |

| Project Phase | Measures                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|---------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|               | <ul style="list-style-type: none"> <li>In the event of any spill, a notification will be sent to the NICG and NG at <a href="mailto:nainicg@nfaiabn.com">nainicg@nfaiabn.com</a> or 1-709-899-0041, and <a href="mailto:spills@nunatsiavut.com">spills@nunatsiavut.com</a></li> <li>Contaminated soil will be reported to a Government of NL Environmental Protection Officer at (709) 896-5428.</li> </ul>                                                                                                                                             |
|               | <p>All spills or leaks of hazardous materials must be reported to the Proponent. As demonstrated in the spill response report form included as Appendix A, the report will outline:</p> <ul style="list-style-type: none"> <li>The cause of the release;</li> <li>Adequacy of the response to the release by the persons responsible;</li> <li>Plans to remediate land that was directly impacted;</li> <li>Manners of collection and dispose of the contaminant; and,</li> <li>Plans to prevent a reoccurrence of the unauthorized release.</li> </ul> |
|               | The proper cleanup of spills shall be coordinated by the site manager and undertaken in a safe and responsible manner, in consultation with qualified professionals                                                                                                                                                                                                                                                                                                                                                                                     |
|               | All contractors and other personnel will make sure to follow the requirements for fuel storage, handling and transport guidelines as outlined in the Mineral Exploration Standards Regulations for Mineral Exploration within Labrador Inuit Lands under the Labrador Inuit Land Claims Agreement Act.                                                                                                                                                                                                                                                  |

### 3.11 Fire Prevention and Response

Fires may cause damage to the natural environment and Project infrastructure, and endanger both site personnel and wildlife. The measures listed in Table 3.11 will be implemented to ensure that the risk of a fire event is mitigated during Project activities, and that if they occur, fires are contained as quickly as possible.

**Table 3.11 Fire Prevention and Response – Mitigation Measures.**

| Project Phase              | Measures                                                                                                                                                                                                         |
|----------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| All phases                 | Contractors and/or workers will not construct or use campfires on site, nor will any materials or wastes be burned for any reason.                                                                               |
|                            | Heavy equipment operators will be outfitted with fire suppressant equipment.                                                                                                                                     |
|                            | Fire suppressant equipment will always be located on site during active construction or maintenance activities.                                                                                                  |
|                            | Flammable waste will be handled and disposed of responsibly, according to the measures outlined in Sections 3.8 and 3.10.                                                                                        |
|                            | If a fire is observed on site, the fire department and RCMP are to be informed immediately (call 911). If it is safe to do so, personnel may contain or extinguish small fires using fire suppressant equipment. |
| Operations and Maintenance | To mitigate the risk of fire propagation during the operation and maintenance phases of the Project, fire suppressant will be always located inside the turbines and within the E-House at the BESS site.        |

| Project Phase | Measures                                                                                                                                                                                                                                     |
|---------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|               | Regular turbine inspections will take place throughout the operations and maintenance phase to ensure that all turbine components are properly maintained and functional. Faulty equipment will be repaired or replaced as soon as possible. |

## 4.0 Plan Review and Updating

This EMPP will be reviewed on a regular basis and is to be updated with new information and/or most current best practices as applicable. Changes will be tracked using the revision history table. Amendments to the EMPP will be communicated to all relevant staff and Contractor(s) by the Proponent as soon as practicable. Contractor(s) are responsible for ensuring that their staff are aware of changes to the plan.

## 5.0 Emergency Contacts

Table 5.1 provides contact information for local emergency services, environmental emergency services, and the Proponent. General emergency response procedures will be provided in the Project Emergency Response Plan (ERP).

**Table 5.1 Emergency contact list for the Project.**

| Organization                                                       | Contact Number                 | Email                        |
|--------------------------------------------------------------------|--------------------------------|------------------------------|
| <b>Local Emergency</b>                                             |                                |                              |
| Nain RCMP                                                          | 709-922-2862                   | -                            |
| Nain Health Clinic                                                 | 709-922-2912                   | -                            |
| RCMP/Fire Department/Ambulance                                     | 911                            | -                            |
| <b>Environmental Emergencies</b>                                   |                                |                              |
| Government of NL, 24-Hour Environmental Emergencies and Complaints | 709-772-2083 or 1-800-563-9089 | -                            |
| Canadian Coast Guard                                               | 1-800-565-1633                 | -                            |
| Canadian Wildlife Service                                          | 1-800-565-1633                 | -                            |
| <b>Natural Forces Contacts</b>                                     |                                |                              |
| Senior Project Manager                                             | 709-571-4297                   | nheffern@naturalforces.ca    |
| Director of Operations                                             | 902-422-9663                   | operations@naturalforces.ca  |
| Environmental Inquiries                                            | 902-422-9663                   | environment@naturalforces.ca |

## 6.0 References

Fisheries and Oceans Canada. (2025, December). Code of practice: Temporary fords: Crossing.  
<https://waves-vagues.dfo-mpo.gc.ca/library-bibliotheque/41289092.pdf>

**APPENDIX A**  
**SPILL RESPONSE REPORTING FORM**

## Environmental Management & Protection Plan

### Spill Response Reporting Form

#### Spill Response Reporting Form

|                                                                                                    |  |
|----------------------------------------------------------------------------------------------------|--|
| General information                                                                                |  |
| Date (dd/mm/yyyy)                                                                                  |  |
| Contact person                                                                                     |  |
| Consultant or Contractor                                                                           |  |
| Address                                                                                            |  |
| City                                                                                               |  |
| Postal Code                                                                                        |  |
| Tel                                                                                                |  |
| Email                                                                                              |  |
| Details of incident                                                                                |  |
| Date of spill (dd/mm/yyyy)                                                                         |  |
| Time of spill (hh:mm)                                                                              |  |
| Weather conditions at the time of the spill                                                        |  |
| Name of person who reported the spill                                                              |  |
| Name of person who responded to the spill                                                          |  |
| Type of contaminant spilled                                                                        |  |
| Description of spill (size, location, environment, source of spill, extent of contamination, etc.) |  |
| Cause of spill                                                                                     |  |

|                                                                           |  |
|---------------------------------------------------------------------------|--|
| Response to the spill (in detail)                                         |  |
| Names of organization, departments or local authority contacted           |  |
| Adequacy of the response (by person responsible)                          |  |
| Are further steps required to remediate the land (y/n)                    |  |
| If yes, describe the future plans to remediate the land that was impacted |  |
| How was the containment collected and disposed                            |  |
| Describe the steps or approach that will be implemented to                |  |

# **APPENDIX B**

## **COMPLAINT RESOLUTION PLAN**

## **Formal Complaint and Concern Procedure for the Nain Wind Micro-Grid Project**

To reduce reliance on diesel fuel as well as to pursue the opportunity to promote economic development, NG has been pursuing a wind project in Nain. Through an open tender process, the NG selected NF as a development partner for the Nain Wind Micro-Grid project.

The Proponents are committed to addressing any public concerns regarding the Project. The intention is that this plan can inform the public on the ways that they can communicate their concerns to the Partnership and how concerns will be addressed.

### **1.0 PURPOSE**

The purpose of this policy is to ensure all public concerns are dealt with consistently and effectively.

Proponents aims to:

- Manage concerns and complaints openly, promptly, and properly;
- Resolve concerns and complaints as soon as possible; and,
- Learn from the issues and improve our commitment to minimize any impacts on the community.

### **2.0 SCOPE**

This policy will address any concerns complaint; written or spoken expression of dissatisfaction that are brought forward to the Proponents regarding the Nain Wind Micro-Grid Project.

### **3.0 PROCEDURE**

All concerns or complaints of the Nain Wind Micro-Grid Energy Project will be directed to Natural Forces at:

Natural Forces | Consultation Line

1701 Hollis Street | Suite 1200 | Halifax | NS | B3J 3M8

Tel: +1 902 422 9663

Website: [www.naturalforces.ca](http://www.naturalforces.ca)

The complainant(s) will be notified upon receipt of the complaint. The Proponents will investigate complaints within 20 days of being receiving; upon which complainant will be notified of how the concern was or will be addressed.

### **3.1 Noise and Shadow Flicker**

Complaints regarding noise and shadow flicker will be assessed on a case-by-case basis. The specific date and time frame at which the noise or shadow flicker was perceived as well as the local weather conditions will be noted. The NF Operations Team will then be contacted to determine the direction of the wind, the status of the turbine and the speed of the wind at the time of the perceived impact.

All the details will be included in a concern and complaint tracker. The complainant will also be asked to record any additional incidents or occurrences.

If several occurrences of issues regarding noise and/or shadow flicker that arise from the Nain Wind Micro-Grid Project, an assessment of the causes of the impacts will be conducted and a monitoring program will be developed and implemented in consultation with the complainant.

Complainant(s) will be informed of noise and shadow flicker mitigation strategies and will be contacted periodically throughout the first year of the implementation of the noise or shadow flicker reduction strategies to determine the success of the strategy.

### **3.2 Construction and Operation**

Complaints regarding construction and operation activities will be discussed with workers or contractors involved.

Solutions to the complaints will be established with worker(s) and contractor(s). Complainant will be informed of how issue was addressed.

If complaints persist, then worker(s) and contractor(s) may be dismissed.

## **4.0 CLOSURE**

If the complainant is not satisfied with the initial response, the complaint will be referred to a higher authority within the company to further resolve the issue.