Great Atlantic Salt

Early Works Bat Preventative Measures Plan

Atlas Salt Inc.

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Prepared by:
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Version 1.0

Revision History

Version	Author/Reviewer	Notes / Comments	Date
1.0	Jeffrey Janes - Author/ Andrew Smith - Reviewer	Atlas Approved Version 1.0 – Initial Submission to Regulator	March 24, 2025

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Acronyms and Abbreviations

Acronym	Title
BPMP	Bat Preventative Measures Plan
EA	Environmental Assessment
EAR	Environmental Assessment Registration
km^2	Square kilometer
m^2	Square metre
NL	Newfoundland and Labrador
NLDECC	Newfoundland and Labrador Department of Environment and Climate Change
NLDFFA	Newfoundland and Labrador Department of Fisheries, Forestry and Agriculture

1 Introduction and Rationale

On April 19th, 2024, the Great Atlantic Salt Project (the Project) by Atlas Salt Inc. was released from the Environmental Assessment (EA) process by the Government of Newfoundland and Labrador's Minister of Environment and Climate Change, subject to conditions. One of the conditions of the release letter is that Atlas Salt Inc. is to provide a Bat Preventative Measures Plan for the Project related to occupation, to be approved by the Wildlife Division of the Department of Environment and Climate Change (NLDECC), prior to the beginning of construction activities.

This Early Works Bat Preventative Measures Plan (BPMP) has been provided to satisfy one of the conditions of the release letter, as it applies to early works construction activities (defined in Section 1.5 below) for the Project.

1.1 Scope of Bat Preventative Measures Plan

The scope of this BPMP applies to only a portion of the Project, the Early Works construction activities, and focuses on preventing bat occupation of infrastructure. Those activities are described in more detail in Section 1.5, but generally involve most of the site preparation work prior to constructing additional infrastructure such as buildings, truck shop, settling ponds, etc. The full overview of Project phases and activities is provided in Figure 1 below.

The BPMP will be revised and re-submitted for approval as the Project moves through its various construction and operations phases and will provide additional detail and procedures for the expanded scope of activities associated with each phase. These revisions will be submitted to Wildlife for approval, prior to the beginning of each new phase.

1.2 Overview of Atlas Great Atlantic Salt Project

The Project is located on the west coast of the Island of Newfoundland within the municipal boundaries of the Town of St. George's.

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

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

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

The core components of the overall Project are presented in the Figure 2 below and include:

- An underground salt mine and ore processing (crushing and screening) facilities;
- Mine site surface infrastructure;
- An overland conveyor system routed along the existing Flintkote Road;
- Use of the existing Turf Point marine facility, with some planned modifications and upgrades to the storage facilities; and
- Associated, ancillary infrastructure including access roads, water and sewer systems, and power supply.

Commencing Q4 2024 with detailed permitting, engineering and the procurement of key long-lead components, the current Project schedule would see construction activity in the field beginning in Q2 2025 and continuing year-round. The operations phase of the Project will commence upon completion of construction and associated commissioning, with initial (capital development) mining commencing in Q4 2025 and extending to approximately Q2 2029. This will be followed by the installation of underground infrastructure, after which mine production will ramp up to commercial production levels in Q4 2029 and extend for an operational period of at least 34 years. Progressive rehabilitation activities will occur throughout the life of the mine with final closure and rehabilitation activities after the operations have ceased. Figure 1 below provides a high-level schedule of the Atlas GAS Project.

It should be noted that the overall project schedule is subject to change based on several factors, but at the time of submission this is the most current schedule to date. Early Works Activities are identified to occur within April 9th, 2025 to April 16th, 2026. For those activities described in Section 2.2 related to interactions with bats, they are currently anticipated to occur in the fall (September-November) period of 2025.

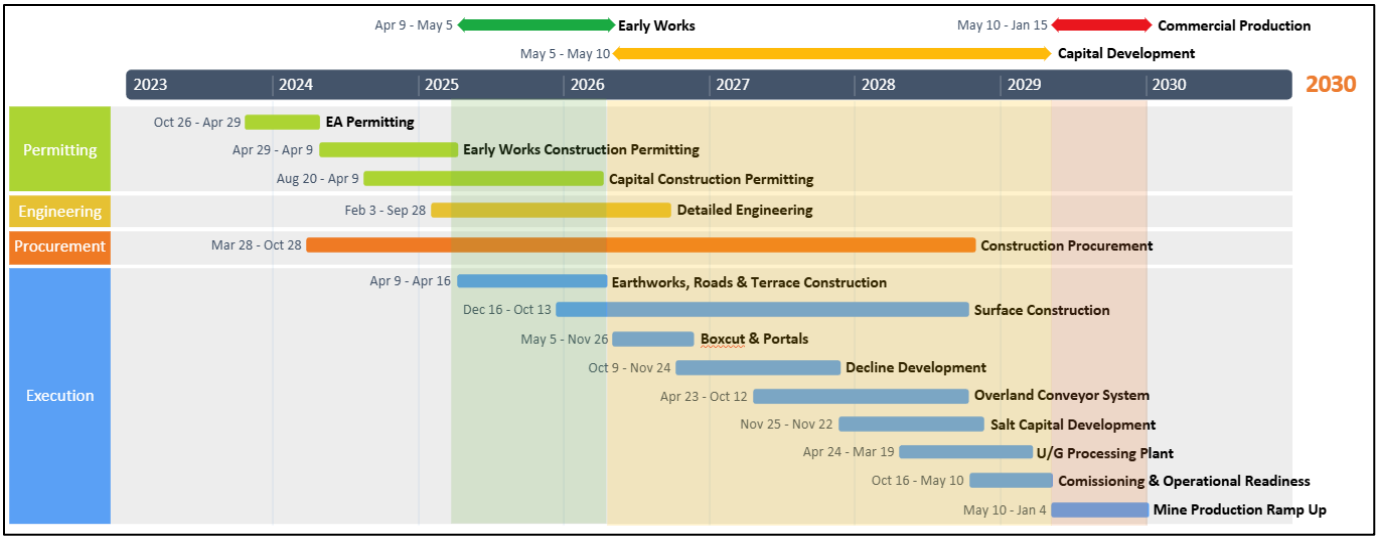

Figure 1: High Level Project Schedule

1.3 Company Information

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

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

Name of Corporate Body	Atlas Salt Inc.
Headquarters Address	100 New Gower Street, Suite 910 St. John's, Newfoundland and Labrador Canada A1C 6K3 Tel (709) 754-3186 Email. info@atlassalt.com
Atlas Salt - St. George's Office Address	2 School Road St. George's, Newfoundland and Labrador Canada A0N 1Z0

Corporate Website	AtlasSalt.com
Chief Executive Officer	Patrick Laracy CEO and Chairman
Principal Contact Person for Engineering and Construction	Robert Booth, Vice-President, Engineering
Principal Contact Person for Corporate Issues	Alasdair Federico Vice-President, Corporate Affairs

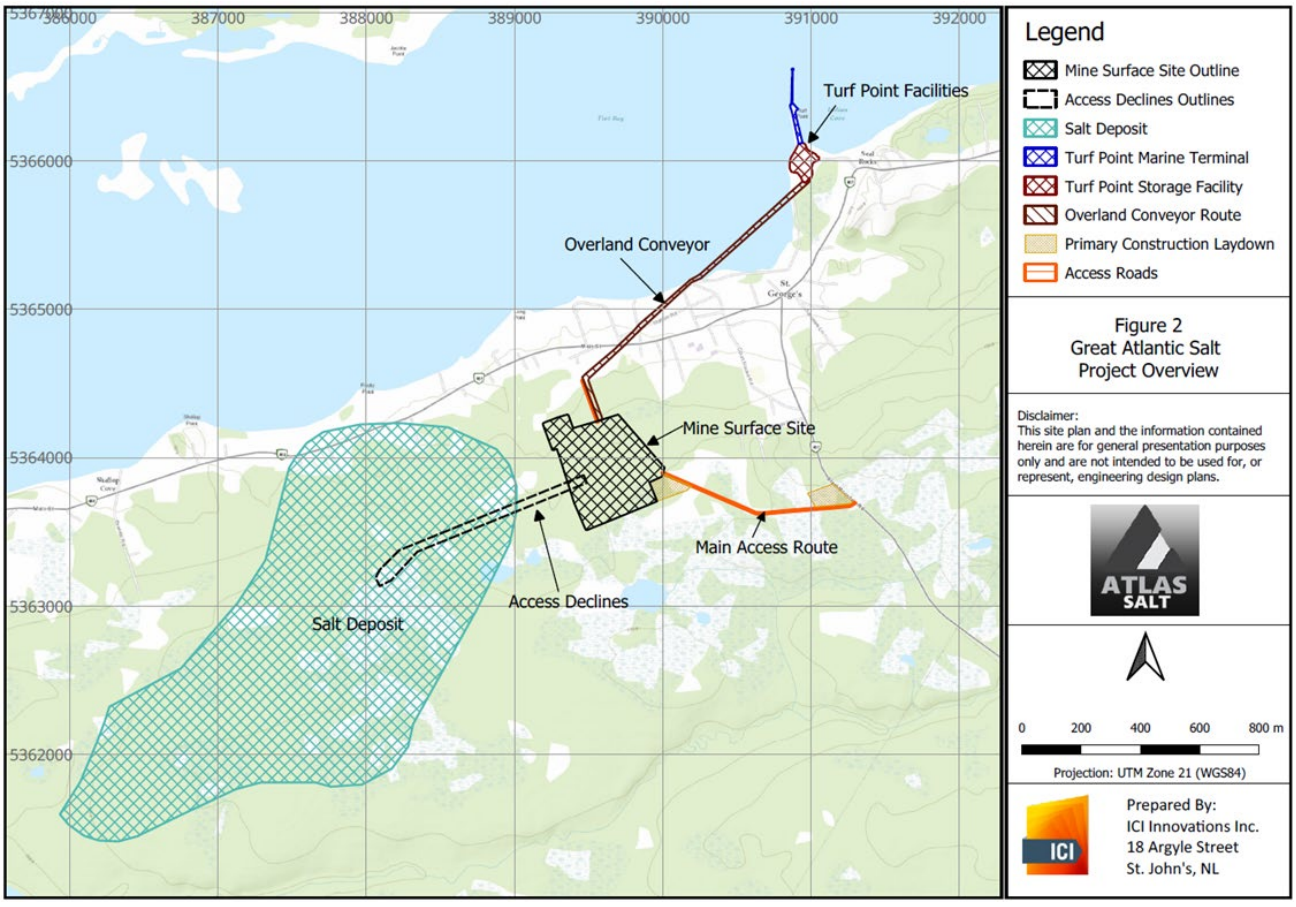

Figure 2: Project Overview

1.4 Rationale for Current Activities

Atlas completed a feasibility study in 2023 and submitted the required EA Registration in February 2024. The project was subsequently released from EA April 19, 2024. Atlas has defined a construction plan to achieve salt production and start of mine ramp up by Q2 2029 (See previous Figure 1).

This plan sees construction completed in phases with a pre-early works phase completing land acquisitions, permitting, and surveying; an early works construction phase including surface earthworks, roads, terrace construction, stockpile foundations, onsite catchment ditching and peripheral berms / diversions ditching and fences. Subsequent phases will include site infrastructure, power, water and sewer, and then a capital construction phase commencing later in 2026.

The early works construction phase does not include any underground, conveyor, storage or marine terminal components (Figure 2).

This document covers the Early Works Activities of the project, as it relates to bats, their potential for occurrence during early works, and preventative measures. This document will be reviewed as each phase of the Project approaches and Atlas will revise and re-submit as needed based on discussion with the Wildlife Division of NLDFFA.

1.5 Overview of Early Works Activities

This plan covers the early works development that includes the following components, within the early works area defined in Figure 3:

a) Provincial Road Access
b) Primary Access Road
c) Construction Laydown Areas
d) Temporary Construction Facilities
e) Clearing of Site Overburden
f) Temporary sediment and erosion control
g) Peripheral berms / diversion ditches and fencing
h) Terraces, including the stockpile pads for the organic, waste and pre-production stockpiles
i) Onsite Catchment Ditches
j) Temporary Settling Basin
k) Secondary Access Road

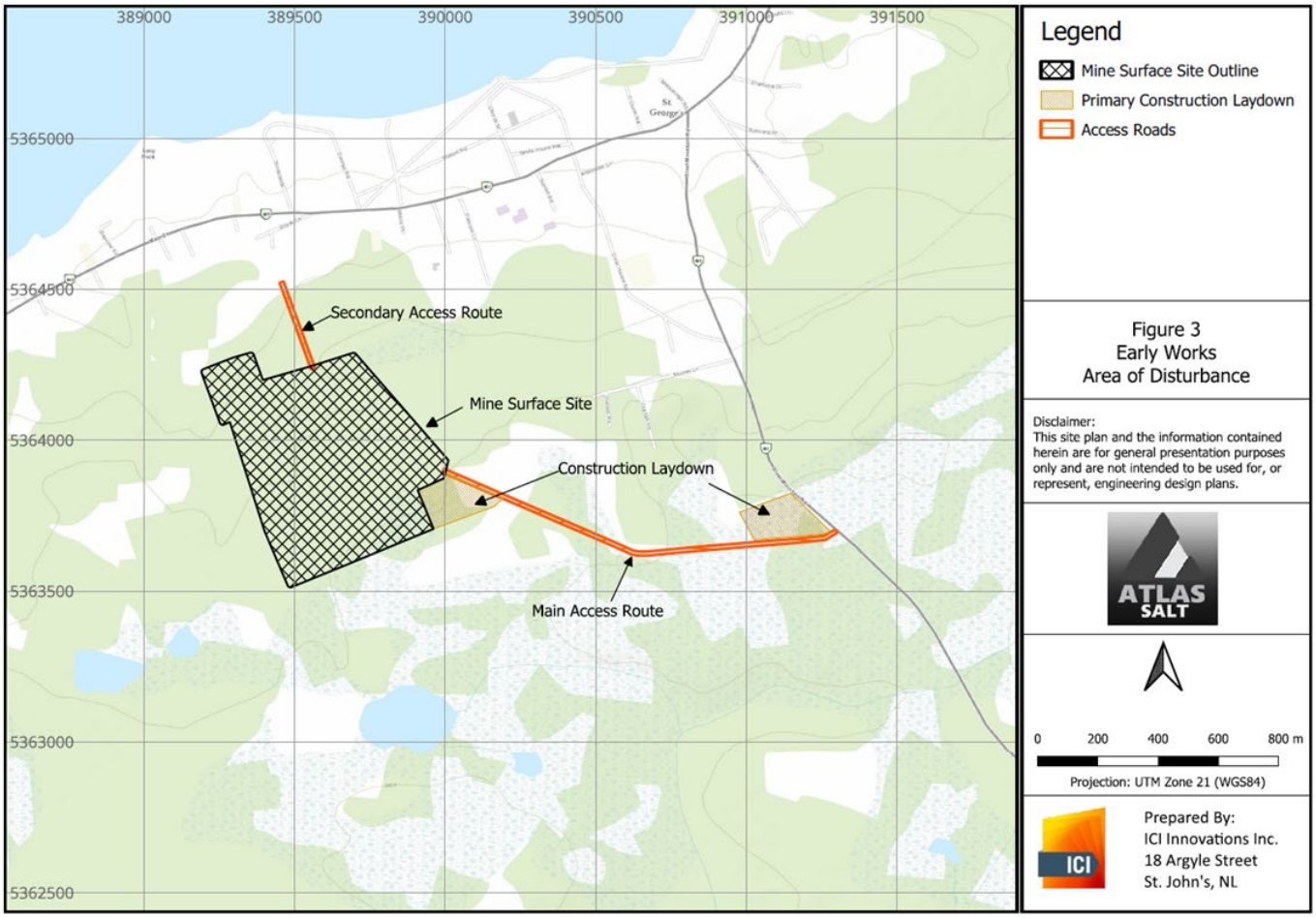

Figure 3: Early Works of Disturbance

2 Overview of Bats and Identified Prevention Measures

This section provides an overview of the bat populations known or suspected to occur within and around the Great Atlantic Salt Project (GAS) area, along with potential interactions arising from early works activities. It synthesizes recent monitoring data, outlines typical behaviors and activity periods for the identified species, and highlights the primary ways in which construction and site preparation could affect bats. Building on this foundational knowledge, the section then details specific prevention and mitigation measures intended to avoid or minimize adverse impacts to bat populations. Through careful timing of site clearing, strategic design of temporary structures, and ongoing collaboration with wildlife authorities, these preventative

approaches aim to meet regulatory requirements while ensuring the project's early works phase is conducted in an environmentally responsible manner.

2.1 Current Knowledge of Bats within Project Area

The area of the proposed Atlas Salt Mine (~47ha) was surveyed for bat presence in two separate studies. In 2022, Gemtec Consulting Ltd Installed acoustic monitors in the vicinity of the project site to identify bat presence within the proposed mine site (Figure 4). Three species of bats were detected including two myotis species, Northern Long-Eared Bat (*Myotis septentrionalis*) and Little Brown Bat (*Myotis lucifugus*), and Hoary Bat (*Laciurus cinereus*). This study was done to characterize the baseline conditions of the area, in support of the environmental assessment registration (EAR). This information was presented in the EAR by Atlas and is available on the NL DECC website (NL DECC 2024).

Atlas Salt completed further Bat monitoring within the proposed mine site from July 1 to Nov 1 in 2024 (Strum 2024), to support project planning for all phases of development and avoid (where feasible) times where higher bat presence occurs for major activities. Four acoustic monitors were deployed with 66 calls being recorded over the four-month sampling period (Figure 4). The results indicated presence of two Myotis species of Bat including Little Brown Bat and Northern Long-Eared Bat, and one confirmed record of Hoary Bat, which is a migratory bat species.

A total of 66 bat passes were recorded over the 4-month sampling period. The majority of passes were recorded in July and August (16 calls and 48 calls respectively), and one call each in September and October. While not conclusive, this indicates that it is unlikely a maternity bat colony existed in the area in 2024. However, it does indicate that bats are present in the area primarily during the summer months.

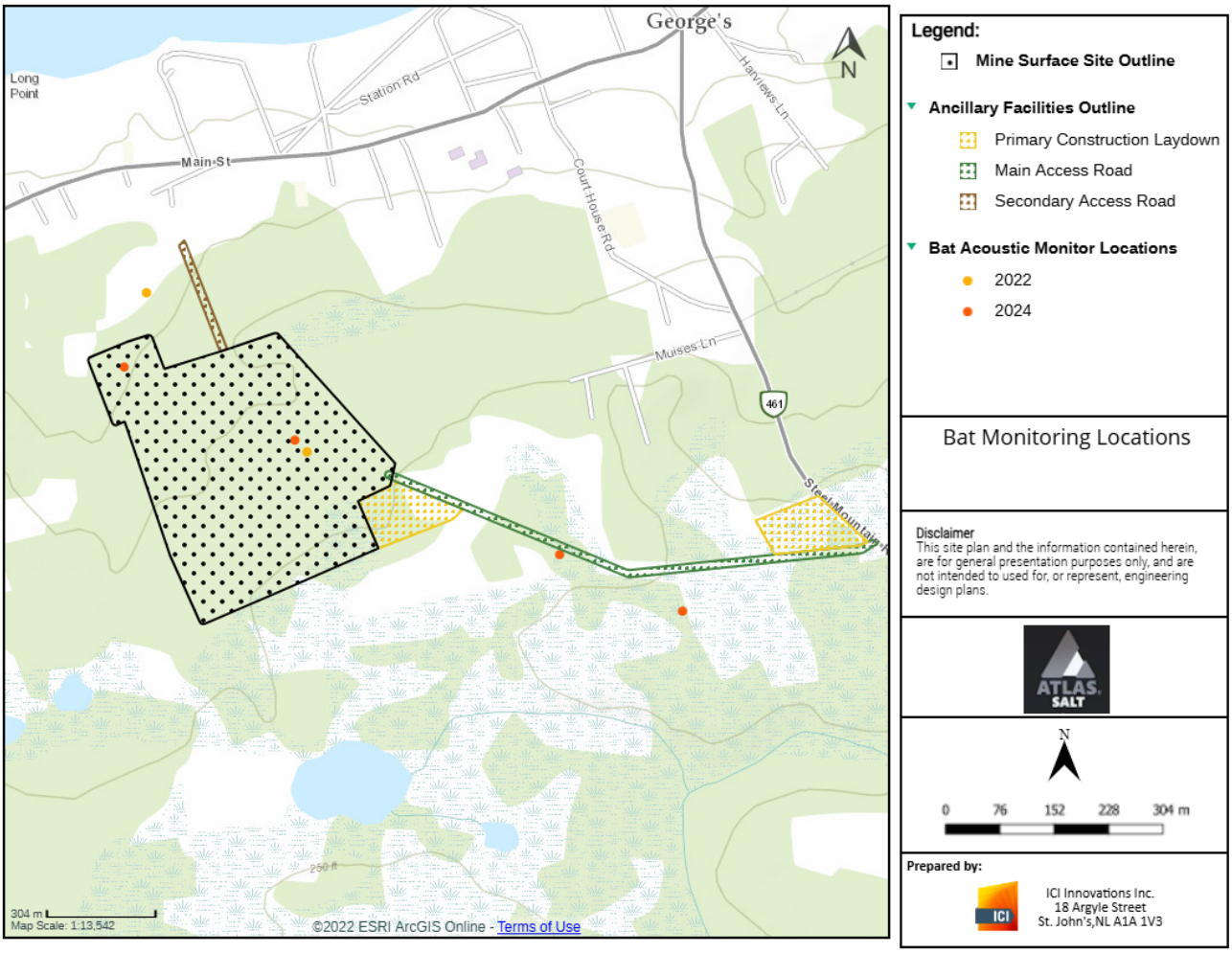

Figure 4: Bat Monitoring Locations

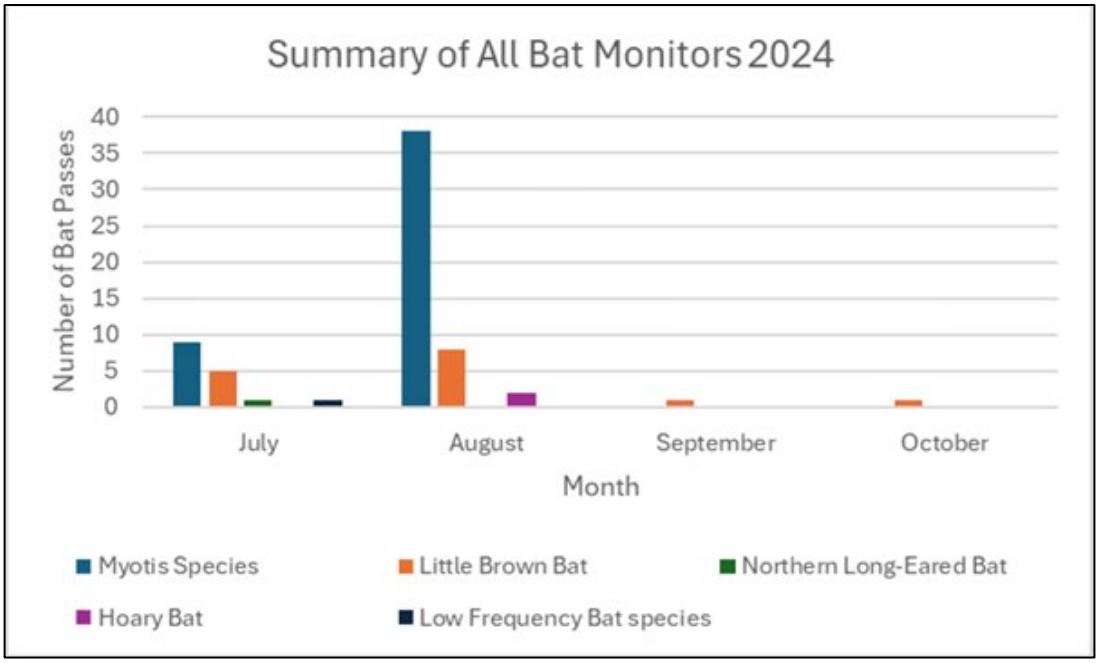

Figure 5: Overview of Timing of recorded calls by Bat Species, July to October 2024 (Source: Strum Consulting (2024))

Additional data collection will be taken during the spring of 2025 to obtain a full season of data and to further inform the timing of activities. Once these new data have been collected and reviewed, Atlas Salt will revisit and, if necessary, update this Bat Preventative Measures Plan to reflect any revised findings, ensuring it remains aligned with current regulatory requirements and best practices.

2.2 Potential Project-related interactions with Bats

Early Works construction involves site preparation and clearing, and there is no excavation of the declines leading to the subsurface salt deposits associated with Early Works activities. Likewise, there is also no construction of permanent buildings or structures at this stage, only the site work to prepare for them. The timing of site clearing will likely occur in September 2025 and is not expected to interact with migratory bat species, based on the data collected to date.

As a result, the activities with the potential to interact with bats are limited and are associated with the following events:

- Clearing activities including grubbing and filling

- Temporary wood storage (any harvestable timber will be collected and distributed to residents)
- Large equipment on site during construction, and
- Temporary structures such as waste structures (e.g., sheds, bins, etc.)

There is the potential that this infrastructure may be used by bats as daytime and/or nighttime temporary roosting sites if they are in the vicinity of the project site.

2.3 Identified Preventative Measures

The following mitigation measures are aimed at reducing potential interactions with bat species on the project site during Early Works Construction. Where appropriate, mitigation measures are taken from and adapted based on those within the Canadian Wildlife Health Co-operative's guide on managing bats in buildings within Newfoundland and labrador (CWHC 2018).

Mitigation measures a broken down into the following categories: Timing of Activities and Preventative measures on Site. Each of these categories is described below.

2.3.1 Timing of Activities

To reduce the potential for interaction with bats, clearing activities will occur outside the identifies sensitive timing windows for bat nesting and roosting. This includes, where feasible, avoiding major activities such as clearing during the summer months of June-August, when pups are typically born, and bats are present at roosting sites (Figure 6). As clearing activities are currently planned for the fall of 2025, this falls outside the roosting window, and within the period where there was less activity based on the 2024 acoustic survey results.

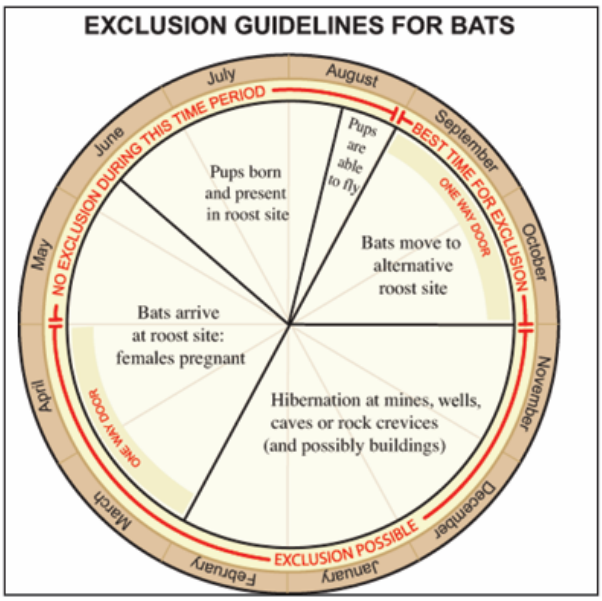

Figure 6: Identified Timing Windows for Bat Exclusion in Newfoundland and Labrador (Source: CWHC 2018)

Once clearing activities take place in the fall and the project site is clear of most vegetation, it will reduce the potential for further interaction with bat species during the remainder of Early Works Activities. Early Works Activities will be planned to take place during the daytime, when bats are less active. This will further reduce the potential for interaction.

2.3.2 Preventative Measures on Site

As mentioned in Section 2.1, while there are not many sources of bat roosting options during early works, temporary structures, heavy, equipment, and stockpiles could potentially provide a roosting site for bat species. The following measures will be put in place to help reduce interaction with bat species:

- Cleared timber stockpiled on site will be done so in a way that reduces large gaps between logs, which could present as potential roosting areas
- Timber piles will be stacked no higher than 6 ft, to reduce the potential of a large option for roosting
- Harvested timber, if any, will be provided to local residents, reducing the amount of stored timber on site
- Temporary structures on site, such as bins, containers, or sheds for storing waste, or temporary office / admin buildings will follow

procedures to reduce the potential for bats to roost. This can include:

  - Sealing open areas with wood, flashing, or weather stripping to prevent entrance of species
  - Identifying areas where bats may enter the structure and addressing them
  - Installing mesh around identified portions of the structure to deter occupation by bats

- If deemed appropriate due to levels of bat activity, bat boxes will be installed nearby to encourage alternative roosting locations for species.

In the event that bat species are found to be roosting within a structure during Early Works Activities, the NLDFFA department of Wildlife will be notified. Atlas will work with Wildlife Division staff to assess the situation and determine the best course of action to eventually exclude the bats from the roosting site and install appropriate measures to avoid future roosting activities.

2.3.3 Training and Awareness

All construction and site personnel, including contractors and subcontractors, will receive an environmental orientation that highlights key steps for recognizing and reporting bat presence. Regular toolbox talks or briefings will also periodically address bat prevention practices, emphasizing the potential for roosting in temporary structures, stacked timber, or equipment. Posters or handouts at common work areas will illustrate how to identify signs of roosting (e.g., droppings, stains, or audible chirping) so that personnel can swiftly notify the Environmental Manager if bat activity is observed.

2.3.4 Monthly Inspections

The Environmental Manager (or designate) will perform monthly inspections of all potential bat-roosting habitats, including timber piles, containers, sheds, and any semi-enclosed workspaces. A standardized checklist will be used to track observations and document any preventative maintenance performed (e.g., repairing damaged seals or mesh). If signs of bat presence are detected, the Environmental Manager will coordinate with the Project Manager to suspend or modify relevant

activities and notify NLDFFA, following the notification and contingency steps outlined in Section 2.4 (Roles and Responsibilities).

2.4 Roles and Responsibilities

This section outlines the primary roles and responsibilities for successful implementation of the Early Works Bat Preventative Measures Plan. All personnel who enter the project site or work on its associated infrastructure shall be aware of the relevant procedures to prevent and mitigate bat occupation and ensure compliance with regulatory requirements.

2.4.1 Atlas Salt Inc.

- Accountability: Holds overall responsibility for ensuring that the BPMP is integrated into early works activities and that adequate resources (financial, personnel, and equipment) are allocated.
- Regulatory Compliance: Ensures that all bat-related conditions outlined by the Environmental Assessment release letter and the Wildlife Division (NLDFFA) are met.
- Plan Updates: Approves revisions or updates to the BPMP as new information arises (e.g., from spring monitoring data or consultation with regulators).

2.4.2 Project Manager

- Plan Implementation: Oversees day-to-day implementation of the BPMP and ensures the mitigation measures (Section 2.3) are carried out by the construction teams and subcontractors.
- Scheduling: Coordinates construction schedules to avoid sensitive bat roosting periods where feasible.
- Decision-Making: Authorizes immediate mitigation actions or halting of activities if unforeseen bat interactions or roost sites are discovered.

2.4.3 Environmental Manager / Coordinator

- Monitoring & Inspections: Conducts regular site inspections to check for potential bat roosting opportunities in temporary structures, stacked timber, and equipment.

- Reporting & Documentation: Documents any bat sightings, signs of roosting, or exclusion measures, and maintains a record of all relevant actions taken.
- Regulatory Liaison: Serves as the primary contact with the NLDFFA Wildlife Division. Informs them immediately upon discovery of roosting bats and coordinates any required follow-up actions.
- Training & Awareness: Organizes staff training or tool-box talks to ensure all personnel can recognize bat roosting signs and know how to report potential bat issues.

2.4.4 Construction Supervisors and Crew Leads

- Daily Oversight: Implement the BPMP's protocols during clearing, grubbing, equipment mobilization, and temporary structure setup.
- Immediate Action: Stop or modify activities if bats are found roosting on or near active work areas and promptly notify the Environmental Manager.
- Maintenance: Ensure that sealing materials, mesh coverings, or other bat-exclusion measures remain intact and effective throughout the early works period.

2.4.5 All Site Personnel and Contractors

- Awareness: Complete any required project orientation or training related to wildlife management and the BPMP.
- Observation & Reporting: Alert supervisors or the Environmental Manager if any bats or suspected roosting sites are discovered (e.g., inside equipment, wood piles, or temporary facilities).
- Compliance: Follow instructions on equipment use, material stacking, and structure maintenance to minimize roosting possibilities.

2.4.6 Wildlife Division (NLDFFA)

- Consultation & Guidance: Provides regulatory guidance and approvals for any bat-related mitigation or exclusion activities that fall under provincial jurisdiction.

- Notification Point: Must be contacted if a bat colony is discovered or if additional measures become necessary to protect bat populations.
- Plan Review: Reviews and may require updates to the BPMP in alignment with evolving best practices or policy requirements.

This roles-and-responsibilities framework helps ensure that all parties involved in the Early Works phase of the Great Atlantic Salt Project understand their specific obligations regarding bat prevention. By clearly designating points of contact and creating a chain of accountability, the project team can respond quickly and effectively to any bat-related issue that arises.

3 References

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