

Attachment A
Conditions of Release from Environmental Assessment

EA #: 2351 Green Bay Ming Mine (the Project)

1 Definition

- 1.1 "Act" means the **Environmental Protection Act** (the **Act**).
- 1.2 "Department" means the Department of Environment and Climate Change, and the contact for the Department for this environmental assessment (EA) release is:

Director
Environmental Assessment Division
Department of Environment and Climate Change
P.O. Box 8700
St. John's, NL A1B 4J6
Tel. 709-729-0673
- 1.3 "Minister", unless the context indicates otherwise, means the Minister of Environment and Climate Change.
- 1.4 "Proponent" means a person who carries out or proposes to carry out a Project, or is the owner or person having charge, control or management of a Project.
- 1.5 "Registered" and "registration" mean registered under Section 49 of the **Act**.
- 1.6 "Release" means the release of a Project under Section 51, 54, 67 or 72 of the **Act** from the further application of the EA requirements of Part X of the **Act**.
- 1.7 "Undertaking" includes an enterprise, activity, **Project**, structure, work or proposal and a modification, abandonment, demolition, decommissioning, rehabilitation and an extension of them that may, in the opinion of the Minister, have a significant environmental effect.

2 Acronyms / Abbreviations

EA	Environmental Assessment
REG	Registration document
WRMD	Water Resource Management Division
FFA	Department of Fisheries, Forestry and Agriculture

3 Scope

- 3.1 The EA release letter relates to FireFly Metals Canada Ltd. hereafter referred to as the "Proponent", and their Registration document (REG) for Green Bay Ming Mine, EA REG # 2351, hereafter referred to as the "Project".
- 3.2 The Proponent shall ensure the Project is carried out in accordance with this EA release and their REG.

4 General

- 4.1 The Proponent shall uphold all commitments made in the EA submission to mitigate the effects of the Project on the environment, unless otherwise advised by the Minister.
- 4.2 The Proponent shall conduct the Project in accordance with the **Act**, as amended from time to time.
- 4.3 The Proponent shall provide written notification of Project commencement to the Department, prior to the commencement of Project construction, by sending an email to EAProjectComments@gov.nl.ca.
- 4.4 The Proponent shall update the EA Division on the status of the Project, including a copy of all permits, licenses, certificates, approvals and other authorizations required for the Project, within one year from the date of this EA release letter and provide additional updates if required. Project updates shall be emailed to EAProjectComments@gov.nl.ca.
- 4.5 This EA release does not exempt a Proponent of a Project from the requirements imposed upon the Project by (a) another Act or regulation of the province or of Canada; or (b) a municipal regulation, by-law or requirement.
- 4.6 A license, permit, approval or other document of authorization pertaining to the Project shall not be issued under another Act until the Project has been exempted or released from EA.
- 4.7 Prior to a proposed change to any aspect of the Project from that proposed in the REG, the Proponent must submit the proposal to the Department to review for regulatory requirements, including EA.
- 4.8 No authority is granted by this EA release to enable the Proponent to commence or continue the Project on lands which are not in the control or ownership of the Proponent. It is the responsibility of the Proponent to ensure that such a contravention does not occur.
- 4.9 The Proponent shall notify the Minister before a transfer, sale or lease of the Project.
- 4.10 Where a timeline is associated with a condition(s) of the EA release, the Proponent shall fulfil the requirements of the condition(s) within the prescribed timeline, unless otherwise authorized in writing by the Minister.
- 4.11 If there is a discrepancy between the REG and the conditions of this EA release, the conditions of this EA release shall apply.
- 4.12 The Proponent shall bear all expenses incurred in carrying out the environmental management and monitoring required under the conditions of this EA release, the **Act** or the Environmental Assessment Regulations.

- 4.13 The Proponent shall ensure that this EA release, or a copy, is present at the Project site while personnel are on site and that personnel directly involved in the Project are made fully aware of the conditions which pertain to this EA release.
- 4.14 Throughout the life of the Project, the Proponent shall conduct any additional studies or monitoring and/or implement additional mitigation measures as required by the Minister.
- 4.15 The Proponent shall advise the EA Division by email of when the requirements of conditions of release have been completed, by providing a written description, documents, and images (where applicable) to demonstrate the completion of requirements. Information shall be emailed to EAProjectComments@gov.nl.ca. The Minister will advise the Proponent in writing of whether the condition(s) of release have been met.

5 Water Resources

- 5.1 The proponent shall, in consultation and partnership with the Water Resources Management Division (WRMD) of the Department of Environment and Climate Change, increase the real-time water resources monitoring network which shall be comprised of water quantity, quality, and/or groundwater monitoring stations. The proponent shall bear all costs associated with the monitoring network and shall install the required stations to collect baseline data, and throughout the life of the Project.
- 5.2 The groundwater flow modelling and groundwater contaminant transport modelling report, and 2024 groundwater monitoring program summary report shall be submitted to the WRMD for approval prior to the commencement of Project construction.
- 5.3 The Proponent shall submit a Water Resources Management Plan for the approval of the WRMD prior to the commencement of Project construction. Please contact the Water Rights, Investigations and Modelling Section at waterinvestigations@gov.nl.ca for any information needed to prepare the plan. Approved plans will be posted publicly on the EA Project webpage.

6 Habitat, Flora and Fauna

- 6.1 The Proponent shall conduct the following surveys in consultation with the Wildlife Division of the Department of Fisheries, Forestry and Agriculture (Wildlife Division) and Fisheries and Oceans Canada (DFO) where appropriate, prior to the commencement of Project construction for all new Project components and areas:
 - Black Ash and Red Pine targeted surveys;
 - baseline surveys for insects listed under the Newfoundland and Labrador **Endangered Species Act**;
 - quantitative fish and fish habitat survey;
 - social and creel surveys for recreational fisheries;

- pre-clearing survey for potential bat roosts of all large trees and snags with a diameter at breast height of greater than 25 cm, should any trees be removed between May 1 to Sept 1;
 - if an active bat colony is detected, a no-cut buffer of 250 metres shall be applied and information including geospatial location immediately sent to the Wildlife Division;
 - subsequent bat emergence survey must be conducted in the fall to confirm that juvenile bats have fledged and dispersed from the site; and
 - any bats detected in Project structures for the lifetime of the Project must be reported to the Wildlife Division.

6.2 The Proponent shall submit digital geospatial data and, where applicable, survey tracks (GPS tracklog) for all wildlife surveys conducted in 2024, including:

- raw bat acoustic recording data files, a copy of the files and assigned ID's;
- fish and fish habitat characterization;
- American marten hair snag survey;
- vegetation survey; and
- species of conservation concern and species at risk avifauna sightings/recording.

6.3 The Proponent shall provide mapping and any associated geospatial data of all new watercourse and waterbody crossings.

6.4 The Proponent shall submit an Environmental Protection Plan informed by the above noted surveys, data collection and reporting, which includes identification of erosion and sediment control measures to be implemented, for the approval of the Wildlife Division prior to the commencement of Project construction.

6.5 The Proponent shall submit an Environmental Effects Monitoring Plan (EEMP) that discusses impacts to and preventative measures, mitigations, and long-term monitoring for all species listed under the Newfoundland and Labrador **Endangered Species Act**, species of conservation concern, and wetlands for the lifetime of the Project, including decommissioning and reclamation phases. The EEMP shall be approved by the Wildlife Division prior to the commencement of Project operations.

All required information shall be submitted to the FFA-Wildlife Division at WildlifeReferrals@gov.nl.ca.

7 Employment, Benefits Plan

7.1 The Proponent shall submit a benefits agreement that meets the approval of the Minister of Industry, Energy and Technology. The benefits agreement must include a Gender Equity, Diversity and Inclusion Plan (GEDIP) that meets the approval of the Minister of Industry, Energy and Technology and the Minister responsible for Women and Gender Equality. The benefits agreement and GEDIP shall be approved prior to the commencement of Project construction.

8 Commitments and Conditions of Previous Projects Released from EA

8.1 The Proponent's REG advises that FireFly Metals Canada Ltd. has acquired the assets of the former Rambler Metals and Mining PLC (Rambler Metals and Mining). The Proponent is to uphold all commitments made in the previous environmental assessment submissions of Rambler Metals and Mining PLC (EA Reg. #1487, #1549, #1559, and #1939) and the conditions of release for these projects.



HON. DR. SCOTT REID, MHA
District of St. George's - Humber
Minister

Date: JUN 06 2025