



Environmental Assessment Registration
Snowmobile Trail Upgrade to Shoal Pond Vehicle Access
Bypass Road

November 27th, 2025

Submitted by:
New Found Gold Corporation
300 Garrett Drive
Gander, NL
A1V 0H6 Canada

Prepared by:
GEMTEC Consulting Engineers and Scientists
19 Dundee Avenue
Mount Pearl, NL
A1N 4R6 Canada

TABLE OF CONTENTS

TABLE OF CONTENTS	2
LIST OF FIGURES	3
1.0 PROPONENT	4
1.1 Name: Snowmobile Trail Upgrade	4
1.2 Principal Contact Person: Dr. Jared Saunders, PhD., CRSP, EP	4
2.0 PROJECT AND UNDERTAKING DESCRIPTION	4
2.1 Rationale for the Undertaking	5
3.0 DESCRIPTION OF THE UNDERTAKING	6
3.1 Geographic Location	6
3.2 Physical Features	10
3.3 Natural Environment	13
3.3.1 Forest Type	13
3.3.2 Wildlife	13
3.3.3 Aquatics	14
3.4 Potential Interactions and Mitigations	15
3.4.1 Atmospheric Environment	15
3.4.2 Terrestrial Environment	15
3.4.3 Aquatic Environment	15
3.4.4 Socioeconomic Environment	16
3.5 Construction	16
3.6 Operation	17
3.7 Occupation	18
3.8 Project Related Documents	18
4.0 APPROVAL OF THE UNDERTAKING	19
5.0 SCHEDULE	19
6.0 FUNDING	19
7.0 SUMMARY AND CONCLUSION	19
APPENDIX A	I
APPENDIX B	II

LIST OF FIGURES

Figure 3.1 The Projects Geographic Location	7
Figure 3.2 Project and Undertaking Location	8
Figure 3.3 Aerial View of Project and Undertaking Site.....	9
Figure 3.4 Previous Wooden Bridge	11
Figure 3.5 Location of 9.14 m Prefabricated Steel Girder Replacement Bridge	12

1.0 PROPONENT

1.1 Name: Snowmobile Trail Upgrade

1.2 Principal Contact Person: Dr. Jared Saunders, PhD., CRSP, EP
Director of Environmental & Regulatory Affairs
Email: jsaunders@newfoundgold.ca
Telephone: 1-709-422-3485

2.0 PROJECT AND UNDERTAKING DESCRIPTION

Since 2020, Maritime Resources Corp. (Maritime) collaborated with the Newfoundland and Labrador Snowmobile Federation (NLSF) to manage groomed trail activities during the exploration period of the Hammerdown Gold Project (the Project), in the interest of public safety.

Maritime is now under the full ownership of and operated by New Found Gold Corporation (NFG).

The Project is located approximately 5 kilometres (km) southwest of the town of King's Point and 15 km northwest of the town of Springdale and will involve the extraction of gold-rich mineralization, comprised of an open pit mine, a waste rock area, organics and overburden stockpile areas, a low-grade ore stockpile, a mobile crushing and ore-sorting plant, an ore rejects stockpile and associated operational infrastructure including water-management features.

The Project was released from further Environmental Assessment (EA) in 2021 (Project 2091).

As part of the Project's release, NFG is required to ensure safe public access to Shoal Pond Valley—a local cabin area—by upgrading an existing bypass trail (the Undertaking). This bypass is part of the NLSF trail system. The upgrade will eliminate the need for public access along the first 1.5 km of Shoal Pond Forestry Access Road, which currently provides access to the Hammerdown Mine Site.

The NLSF trail, which already accommodates some vehicular traffic, will be upgraded to support two-lane vehicle access through to Shoal Pond Valley. Once complete, this upgraded trail will serve as the new public access route until the end of Life of Mine (LOM).

NFG is the proponent of the Undertaking and of this associated registration document.

Springdale Forestry Resources (SFR), an ISO 14001 certified contractor with extensive resource road construction experience throughout the province, will be handling construction activities of the Undertaking.

Originally upgraded in 2020 to redirect snowmobile traffic from Shoal Pond Forestry Access Road, the bypass trail spans 2.1 km. The NLSF currently holds a License to Occupy (LTO) a 6-meter width of this trail (#132588). On June 20, 2025, Maritime submitted an amendment request to Crown Lands to increase the LTO width to 20 meters. With Maritime now wholly owned by NFG including the business name and number, it was deemed unnecessary to submit under NFG's name. This expansion will support the upgrade of the trail to a Class C-2 forest access road standard, enabling safe two-lane vehicle traffic outside the active mining area.

As part of the upgrades, the pre-existing wooden bridge along the bypass was replaced with a steel Bailey bridge in the Fall 2025, in accordance with the previously obtained permit (Appendix A).

The bypass road is located approximately 6.5 km along Route 391 (Harry's Harbour Road) and about 1 km south of the Shoal Pond Forestry Access Road intersection, which provides primary access to the Hammerdown Mine Site. Once completed, the bypass will allow safe public access to portions of Shoal Pond Forestry Access Road not impacted by mining operations. This route will also serve to support uninterrupted access by the Shoal Pond Cabin Owners Association, and the general public.

The Crown Lands application related to this Undertaking is #164361.

2.1 Rationale for the Undertaking

The purpose of the Undertaking is to establish a safe and reliable bypass route to eliminate the need for public traffic along the first 1.5 km of Shoal Pond Forestry Access Road which now serves as the entrance to the Hammerdown Mine site. Maintaining safe public access to Shoal Pond Valley was identified as a requirement of EA release for the Project. The Undertaking proposes to upgrade 2.1 km of existing NLSF trail to a two-lane standard, thereby integrating it as the designated public access road. This upgrade will ensure safe, continuous access for the public while supporting the operational needs of the Project.

This Registration is intended to initiate the provincial EA process for the proposed public bypass road, which will undergo review in accordance with applicable regulatory requirements. In doing so, this registration:

- Identifies the Undertaking's proponent and describes its goals, core values, and environmental management approaches and procedures.
- Describes the proposed Undertaking, including its overall purpose and rationale, as well as its key components and planned construction and operational activities.

- Provides an overview of the existing environmental setting for the Undertaking, some of the potential environmental considerations that have been identified to date, and planned approaches for addressing these in moving forward with the Undertaking.

Notification was sent to the NLSF from the EA Division of the Department of Environment and Climate Change stating that “Assessment Regulations, 2003, section 35(1)(b) defines the project as an undertaking requiring environmental assessment pursuant to the Environmental Protection Act” (Appendix A). Further clarification was provided during a meeting with the EA Division and Crown Lands on November 3, 2025, that the proponent for this Undertaking at that time was Maritime Resources Corp.; however, Maritime has since been fully acquired by New Found Gold Corporation.

3.0 DESCRIPTION OF THE UNDERTAKING

3.1 Geographic Location

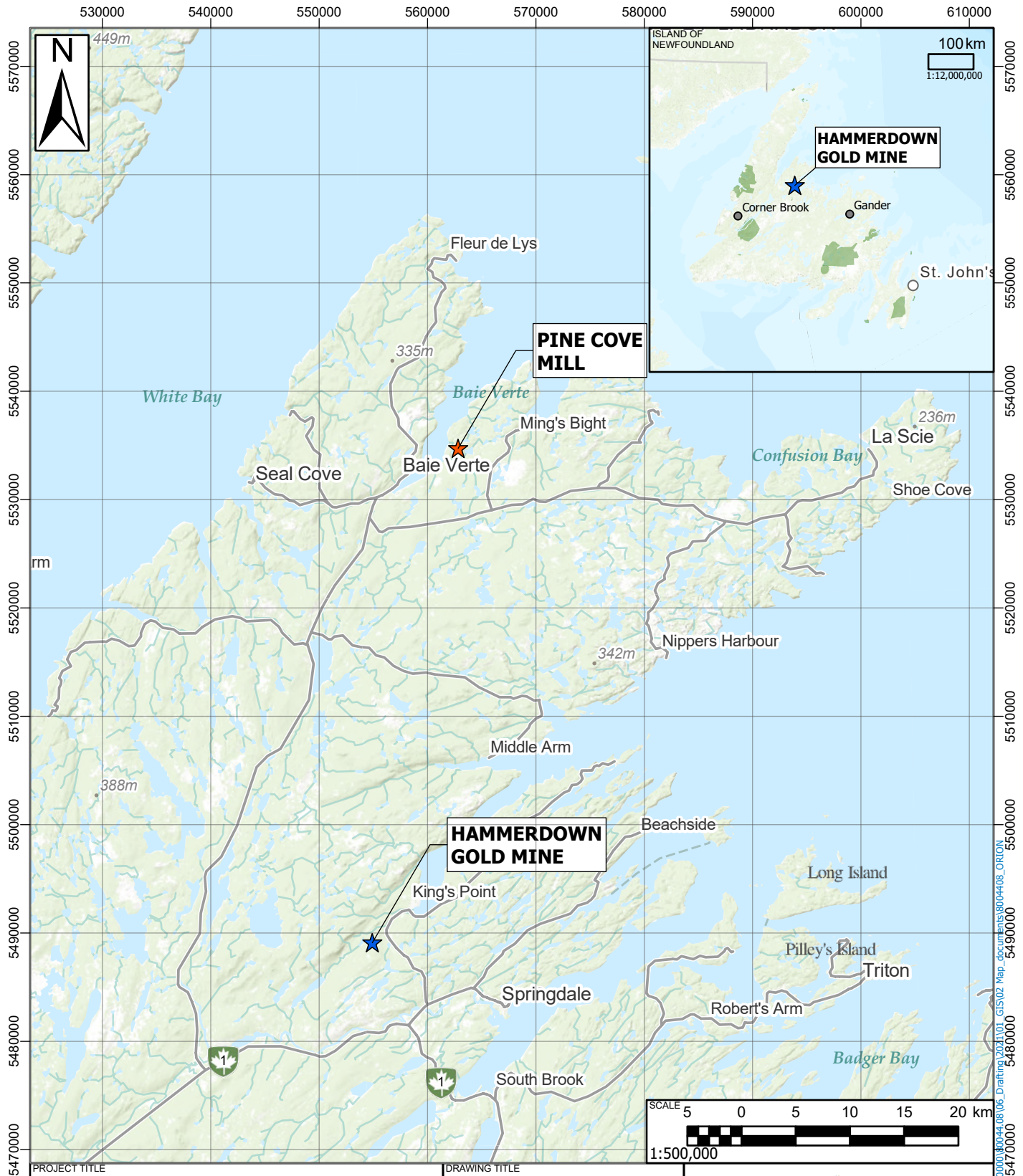
The site of the proposed Undertaking is located at coordinates UTM: 21U 556213 m E/ 5488157 m N.



The bypass road is located approximately 6.5 km along Route 391 (Harry’s Harbour Road) and about 1 km south of the Shoal Pond Forestry Access Road intersection which provides primary access to the Hammerdown Site.

Figure 3.1 shows the Project’s geographic location.

Figure 3.2 shows the Project and Undertaking location with reference to NFG’s Hammerdown Mine Site.

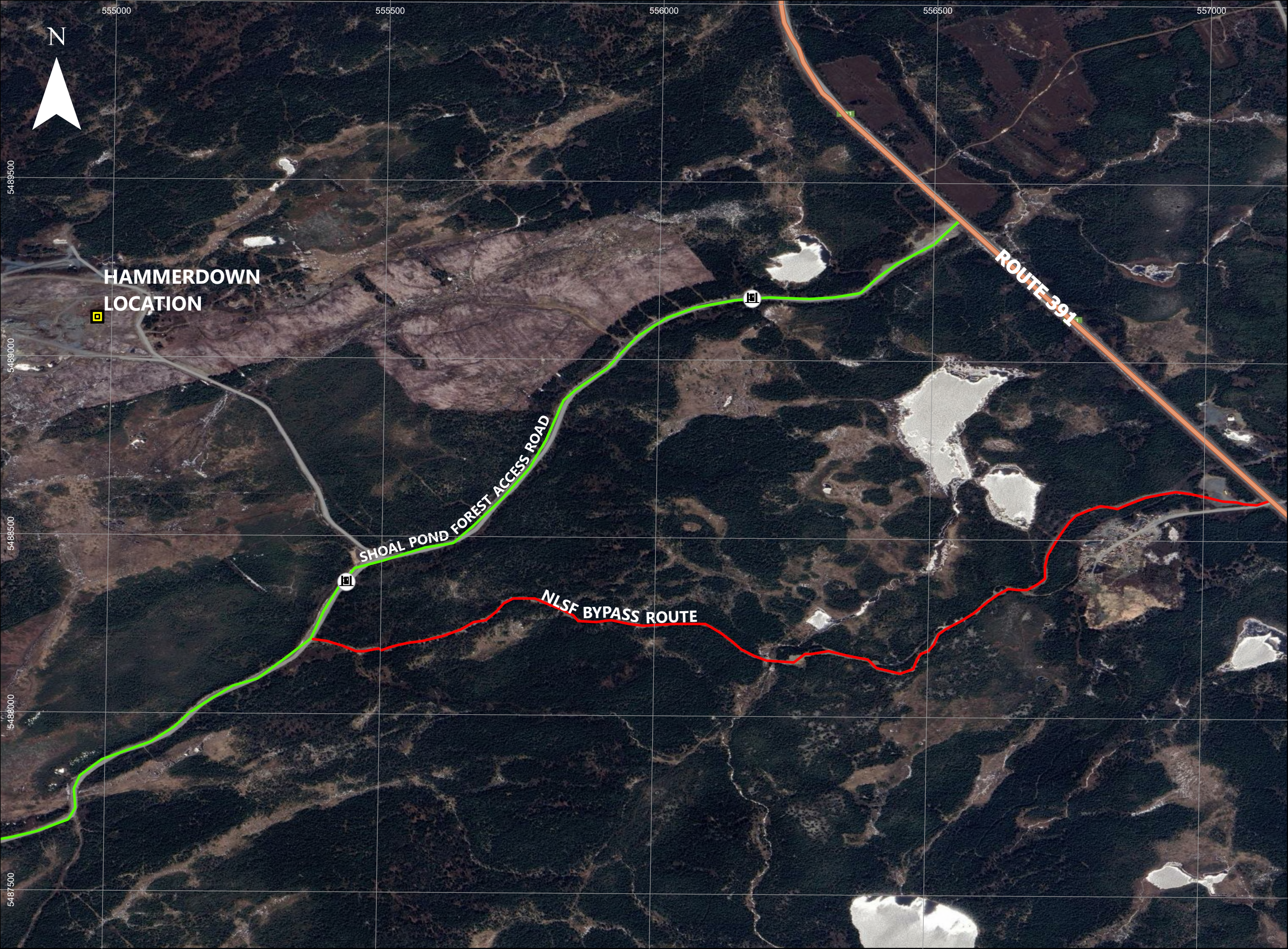
Figure 3.3 presents aerial imagery of the Project and Undertaking site.



PROJECT TITLE				DRAWING TITLE		<div> NEWFOUNDGOLD</div> <div> GEMTEC CONSULTING ENGINEERS AND SCIENTISTS</div>
HAMMERDOWN GOLD PROJECT				GEOGRAPHIC LOCATION		
REPORT TITLE				<div>CREDITS/NOTES</div> <div>1. COORDINATE SYSTEM: NAD 1983 UTM Zone 21N</div> <div>2. Sources: NRCan, Esri Canada, and Canadian Community Maps contributors.; Sources: Esri, Maxar, Airbus DS, USGS, NGA, NASA, CCGAR, N Robinson, NCEAS, NLS, OS, NMA, Geodatatystreken, Rijkswaterstaat, GSA, Geoland, FEMA, Intermap, and the GIS user community, Esri Canada</div> <div>3. Contains information licenced under the Open Government Licence - Canada</div> <div>4. Contains information licenced under the Open Government Licence - Newfoundland & Labrador</div>		
NLSF Snowmobile Trail ByPass Route						
DRAWN BY	CHECKED BY	DRAWING NO.	REVISION NO.	PROJECT NO.	DATE	
PL	JP	FIGURE 3.1	REV0	100013.013	11/27/2025	

CREDITS/NOTES
1. COORDINATE SYSTEM: NAD 1983 UTM Zone 21N
2. Sources: NRCAN, Esri Canada, and Canadian Community Maps contributors. Sources: Esri, Mapbox, Airbus DS, USGS, NGA, NASA, CGLAR, N Robinson, INCEAS, NLS, DS, NNA, Geobase/Geobase, Rijkswaterstaal, GSA, Geoland, FEMA, Intermap, and the GIS user community, Esri Canada
3. Contains information licenced under the Open Government Licence - Canada
4. Contains information licenced under the Open Government Licence - Newfoundland & Labrador






\\Lucid\Drawings and Files\Projects\80000\80044-08\06_Drafting\2021\01_GIS\02_Map_documents\80044-08_ORION

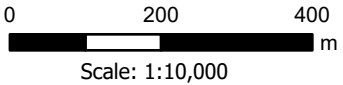



NEWFOUNDGOLD


GEMTEC
CONSULTING ENGINEERS
AND SCIENTISTS

Legend

-  Hammerdown
-  NFG Gates
-  Route 391 (Harry's Harbour Rd.)
-  Shoal Pond Access Road
-  NLSF Bypass Route



NOTES
1. NAD83 UTM ZONE 21N
2. GOOGLE EARTH IMAGERY 2025

PROJECT NAME
PROJECT AND UNDERTAKING LOCATION

DRAWING # FIGURE 3.2	
YYYY-MM-DD	2025-11-27
DESIGNED/ PREPARED	PL
REVIEWED/ APPROVED	JP
Project No. # 100013.013	Rev.01

Figure 3.3 Aerial View of Project and Undertaking Site



3.2 Physical Features

The existing 2.1 km NLSF trail will be upgraded to a Class C-2 forest access road standard, providing two-lane access to Shoal Pond Valley. This upgraded route will form part of the new public access road, replacing the current need for public use of the initial section of the Shoal Pond Forestry Access Road.

The existing trail, currently an approximately 6-meter-wide ATV path, will be widened to a 20-meter-wide corridor suitable for public vehicle traffic. Work will include realignment in certain sections and involve:

- Grubbing and removal of organic material
- Grading and infill where necessary
- Removal of boulders
- Borrowing overburden from within the right-of-way for fill material
- Bridge replacement

This trail was initially upgraded in 2020 to reroute NLSF traffic away from the first kilometre of the Shoal Pond Forestry Access Road, which now forms part of the entrance to the Hammerdown Mine Site.

A laydown area, currently in public use, is located at the point where the trail intersects with Route 391 (Harry's Harbour Road), serving as the access point to the bypass route.

A pre-existing wooden bridge over Fox Pond Brook was replaced with a 9.14-meter prefabricated steel girder bridge (Bailey bridge) capable of supporting heavier traffic.

Figure 3.3 illustrates the previous wooden bridge structure, while Figure 3.4 indicates the location of the installed replacement Bailey bridge.

To reduce public safety risks and prevent unauthorized access to the active mining area, the section of the Shoal Pond Forestry Access Road that directly interacts with the Hammerdown Mine Site will be gated at both ends, diverting traffic to the upgraded bypass route.

An LTO application was submitted to Crown Lands for this section of road on November 26th, 2025.

Figure 3.4 Previous Wooden Bridge













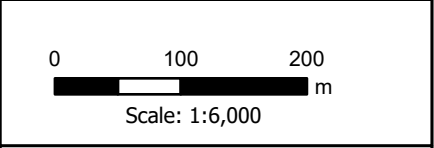
NEWFOUNDGOLD



GEMTEC
CONSULTING ENGINEERS
AND SCIENTISTS

Legend

-  NFG Gate
-  WaterCourse
-  Shoal Pond Access Road
-  NLSF Bypass Route
-  Waterbody
-  Prefab. Steel Girder Bridge



NOTES
1. NAD83 UTM ZONE 21N
2. GOOGLE EARTH IMAGERY 2025

PROJECT NAME PREFAB. STEEL GIRDER BRIDGE LOCATION	
DRAWING # FIGURE 3.5	
YYYY-MM-DD	2025-11-27
DESIGNED/ PREPARED	PL
REVIEWED/ APPROVED	JP
Project No. # 100013.013	Rev.01

3.3 Natural Environment

The Undertaking occurs in the Northcentral Subregion of the Central Newfoundland Forest Ecoregion characterized by higher summer maximum temperatures, lower rainfall, and higher fire frequency than anywhere else in Newfoundland. Relatively low moisture, coarse soils, and the prevalence of black spruce cover types make this subregion particularly susceptible to regeneration failure. Where tree regeneration is lacking, succession to dwarf shrub heath dominated by sheep laurel (*Kalmia angustifolia*) occurs on the nutrient-poor, coarse-textured till that is prevalent throughout much of this area (Newfoundland Labrador Department of Fisheries and Land Resources 2019).

A range of desktop and field studies (terrestrial, aquatic, hydrological and hydrogeological) were conducted in 2016 and 2019 at the Hammerdown deposit area as part of the Project baseline studies.

3.3.1 Forest Type

In 2019, GEMTEC Consulting Engineers and Scientists (GEMTEC) used the NL Forest Inventory Geodatabase to define the habitat at the Project.

Wood Forest and Wet Coniferous Forest were the two most abundant land cover classes encountered at 31.5 % and 32.9%, respectively. Various wetland types represented a total of 14.0% and disturbed areas represented only 4.1 % of the Study Area (EA Registration document, Table 16). The Species at Risk (SAR) desktop study identified two species with the potential to occur in the area.

Boreal felt lichen (*Erioderma pedicellatum*), a SAR identified by the Atlantic Canada Conservation Data Centre (ACCDC) as having the potential to occur in this region, was not found during field studies.

In addition, there is no suitable habitat present for low seablite (*Suaedacal ceoliformis*), typically a maritime plant and a SAR which could potentially occur in the area.

3.3.2 Wildlife

Breeding bird surveys for the Hammerdown Project detected a total of 37 bird species comprising of 106 individuals. No avifauna SAR were detected during the 2016 or 2019 field work.

Other mammals that may be found in the area but were not detected on surveys include Newfoundland marten (*Martes americana atrata*), American mink (*Neovison vison*), ermine

(*Mustela erminea*), deer mouse (*Peromyscus maniculatus*), masked shrew (*Sorex cinereus*) and southern red-backed vole (*Myodes gapperi*).

Both the little brown bat (*Myotis lucifugus*) and the northern long-eared bat (*Myotis septentrionalis*) are federally protected SAR under the Species at Risk Act (SARA), and both can occur within the area.

Both species were given an emergency listing of “Endangered” by SARA in 2014 because of rapid population declines in Canada due to a deadly wildlife disease known as White-Nose Syndrome (Environment and Climate Change Canada 2018).

Echolocation surveys were conducted from August 7 until November 20, 2019 (106 days). An experienced biologist completed the bat identification manually. Echolocation calls recorded were associated with two *Myotis* species of bats (little brown bat (*Myotis lucifugus*), and northern long-eared bat (*Myotis septentrionalis*)).

A total of 189 different plant species were identified in 2019, but none were considered rare or were ranked as S1 or S2 plants by the Atlantic Canada Conservation Data Centre CCDC. An S1 designation indicates that a species is critically imperilled because of extreme rarity or because of some other factor making it especially vulnerable to extirpation from the jurisdiction. An S2 species is imperilled in the jurisdiction because of rarity due to very restricted range, very few populations, steep declines or other factors making it very vulnerable to extirpation from the jurisdiction. A total of 27 S3 plants were noted during the surveys. An S3 designation indicates that a species is vulnerable in the jurisdiction due to a restricted range, relatively few populations, recent and widespread declines, or other factors making it vulnerable to extirpation.

3.3.3 Aquatics

The Undertaking intersects the aquatic environment solely at Fox Pond Brook, where the pre-existing wooden bridge was removed and replaced with a steel Bailey bridge, in compliance with the authorized permit (Appendix A).

Fox Pond Brook, which streams from the southern end of Fox Pond (surface area approximately 55,163 m² / 5.5 ha), is a small freshwater stream that provides downstream hydrological connectivity within the local watershed. The brook is represented on the 1:50,000 Newfoundland and Labrador topographic mapping, indicating it is a regionally recognized surface water feature. It would support typical lotic aquatic habitat conditions found in central and western Newfoundland, including cool, well-oxygenated waters suitable for resident Brook Trout (*Salvelinus fontinalis*). Seasonally, Fox Pond Brook experiences elevated flows during spring freshet and reduced flows during late summer and winter; these fluctuations contribute to habitat diversity. Riparian habitat is representative of the region, consisting of alder thickets, grasses,

and balsam fir stands that provide shading, bank stability, and organic inputs to support aquatic productivity.

3.4 Potential Interactions and Mitigations

3.4.1 Atmospheric Environment

The construction equipment associated with the upgrade of the bypass route will involve an excavator, tandem axle dump truck and grader working for 10 days. This short term and relatively small equipment fleet is expected to have insignificant impacts on the atmospheric environment and will also not be a notable source of noise pollution.

The seasonal maintenance of the road will be limited to some grading in the summer and fall and then a groomer in the winter. These activities are also expected to have nominal impacts on air quality and noise.

3.4.2 Terrestrial Environment

Wood cutting required to expand the width of the trail was carried out in July of 2025 upon receiving Commercial Cutting Permit 25-09-01715. GEMTEC provided nest sweeping services at the time and cleared the area for cutting which was carried out within a couple of days.

The bypass road only required cutting in certain sections to adequately increase the width and straighten the road where necessary. Cutting activity resulted in no notable impacts on the terrestrial environment.

The grubbing and grading of the bypass road required for upgrade is also not expected to have any significant impact on the terrestrial environment. The bypass road as it now exists does not overprint any wetland and widening from 6 m to 20 m will not interact with any ecologically sensitive areas. Construction activities as part of the Undertaking are not expected to negatively impact bird, bat, or mammal species and no further mitigation measures are necessary.

Construction crews will have spill kits on site in the event of an unexpected release.

3.4.3 Aquatic Environment

The wooden bridge at Fox Pond Brook was replaced with a prefabricated steel girder bridge without any instream work. All construction activities were conducted from the existing road prism and bridge footprint, thereby avoiding direct disturbance to the brook channel and riparian zone. Consequently, no potential environmental effects to fish and fish habitat were identified. Construction crews had silt fencing materials on site in the event of an unexpected release of high sediment volumes into the stream. Spill kits were also available on site in case of an unanticipated

release of industrial materials, and construction crews were trained in proper refuelling procedures.

3.4.4 Socioeconomic Environment

The Undertaking is expected to have a positive impact on the socioeconomic environment of the region. Upgrading the bypass road will provide safe and reliable access for cabin owners, recreational users, and outfitters to the Shoal Pond Valley area. In addition, a section of the NLSF trail will be improved, enhancing both public safety and the overall recreational experience.

Beyond infrastructure improvements, the Project will generate substantial economic benefits in the region. NFG anticipates the creation of over 150 full-time jobs over a period of 7 to 10 years related to the Project, contributing significantly to local employment and income levels. The Project will also support regional businesses and service providers, generate provincial tax revenue, and contribute meaningfully to Newfoundland and Labrador's Gross Domestic Product (GDP).

3.5 Construction

The Undertaking will be carried out by SFR by commonly used construction practices and in accordance with standard procedures and applicable regulatory requirements. This contractor is ISO 14001 certified and has extensive experience with resource road construction throughout the province to support commercial forest harvesting.

Construction activities will be carried out in accordance with the approaches presented in the existing approved Hammerdown Development Plan and Rehabilitation and Closure Plan, conditions of EA release for the Project, the existing Environmental Protection Plan (EPP, provided in Appendix B), and other applicable permits. The Project EPP outlines best management practices to be followed for all construction activities. Construction work will also adhere to other environmental plans prepared for the Project, including the Water Management Plan (WaMP), Waste Management Plan (WMP), and the Environmental Contingency Plan (ECP).

The proposed efforts are limited to widening and some straightening of the existing trail, along with the completed replacement of the wooden bridge at Fox Pond Brook with a Bailey bridge. It is planned that construction would progress from the existing trail access point along Route 391 and proceed into the connection with the existing Shoal Pond Forestry Access Road. As Springdale Forestry Resources is currently carrying out construction activities at the developing Hammerdown site, minimal mobilization of equipment and support infrastructure is required associated with the widening efforts. Equipment laydowns and fueling areas will be located at the Hammerdown Mine Site.

Tracked excavators and dump trucks will be the preferred equipment for extraction of borrow overburden material and subsequent road widening. Trees have been cleared in accordance with the issued Commercial Cutting Permit (Appendix A) and salvageable timber has been donated to non-profit organizations of King's Point for charity fundraising initiatives. In accordance with the approved Development Plan and Rehabilitation and Closure Plan, organics will be stripped and windrowed along the proposed corridor where present. Overburden will be borrowed and used for fill to widen the driving surface. Drainage ditches will be excavated along the road length and will connect to the existing ditch system along the existing Shoal Pond Forestry Access Road.

There is no additional culvert installations anticipated along the alignment, and no instream work was required for installation of the Bailey bridge. Given that this is widening of an already established unpaved trail with modest vegetation removal and grubbing, erosion is expected to be minimal. However, during earthworks any activities adjacent to the brook, sediment and erosion control measures will be implemented, if needed and in accordance with the applicable permit conditions.

The existing bridge at Fox Pond Brook was replaced prior to the commencement of road-widening activities, in accordance with Permit No. ALT14422-2025, issued by the Water Resources Management Division on July 7, 2025 (Appendix A). The permit authorized the removal of the former timber bridge and installation of a 9.14 m prefabricated steel girder (Bailey) bridge, and all works were completed in compliance with the permit's conditions.

The bridge was removed and installed from the existing road prism, using excavators and lifting slings operating from both sides of the brook. No instream work was required. The bridge abutments were situated more than 10 m from the stream channel, thereby avoiding any direct interaction with the aquatic environment.

3.6 Operation

The bypass road will provide year-round public access to the Shoal Pond Valley and Shoal Pond cabin area. The route will be designed and constructed to accommodate both on-road vehicles and off-road vehicles (including all-terrain vehicles, snowmobiles, and side-by-sides), similar to the existing Shoal Pond Forestry Access Road.

NFG will be responsible for maintaining the bypass road on behalf of the NLSF and the local cabin owner's association for the duration of the Project, and until such time as public access can resume along the Shoal Pond Forestry Access Road. The bypass road will not be snow cleared during the winter months consistent with current winter access conditions. This approach allows the continued groomed trail operations by NLSF while ensuring that cabin owners retain regular winter access to their properties by snowmobile, as they currently do.

Road maintenance in summer months will be limited to occasional placement and grading of surface topping material to level the surface, reduction of ruts, and addressing any protruding stones, if required.

Shoal Pond Forestry Access Road will be gated at the intersection with Route 391 and also near its intersection with the new bypass road. This is to encourage public use of the new bypass road thereby reducing Project-public interaction in the interest of public safety. Shoal Pond Forestry Access Road, however, will remain available to support commercial forest industry traffic, as well as public access, if the request is made to NFG who will support this use, as needed.

In the event that the bypass road is not available and the Shoal Pond Forestry Access Road is the only available access, the gates will be passable by public traffic under a controlled situation supported by NFG to minimize any risk.

3.7 Occupation

Construction efforts will be undertaken by SFR.

The SFR work crew for the road construction will include two excavator operators (National Occupation Code [NOC] 73400), two tandem axle dump truck operators (NOC 73300), a grader operator (NOC 73400), and a construction supervisor (NOC 72021).

Construction efforts are expected to take 10 days to complete.

The LTO will be held by NFG who will provide yearly maintenance and support to ensure continued safe use of this section of road.

3.8 Project Related Documents

Construction of the bypass road, carried out by SFR and funded fully by NFG, will follow the guidelines, contingencies, and mitigation management as presented in the following documents associated with the developing Hammerdown Project.

- Hammerdown Gold Project EA Registration #2091
- Environmental Protection Plan (EPP)
- Water Management Plan (WaMP)
- Waste Management Plan (WMP)
- Development Plan; Rehabilitation and Closure Plan (DP/RCP)
- Commercial Cutting Permit 25-09-01715

- Bridge Replacement Permit ALT14422-2025

4.0 APPROVAL OF THE UNDERTAKING

The following documentation has been received for the proposed Undertaking:

- Commercial Cutting Permit 25-09-01715, issued June 16, 2025, by the NL Department of Fisheries, Forestry, and Agriculture, Forestry Branch
- Bridge Replacement Permit ALT14422-2025, issued July 7, 2025, by the Department of Environment and Climate Change, Water Resources Management Division (WRMD)

5.0 SCHEDULE

NLSF and NFG consider this proposed road upgrade effort to be urgent to allow the safest option for continued public access to the Shoal Pond Valley region for cabin owners, hunters, snowmobile and ATV users, and others as construction of the approved Hammerdown Project ramps up.

Upon release from the EA process and approval from Crown Lands, construction activities will commence immediately, and prior to freezing conditions. Priority components include the upgrading of the bypass road and installation of the bridge. These works are considered time sensitive as they are required to mitigate safety risks associated with continued public traffic in the Shoal Pond Valley area.

Tree clearing along the alignment was completed in July 2025 following receipt of the commercial cutting permit (Appendix A). Nest sweeping services were carried out by GEMTEC prior to cutting at that time.

The bridge has been replaced in the Fall 2025 in advance of road widening efforts in accordance with the received permit issued by WRMD.

6.0 FUNDING

The estimated cost of the Undertaking is \$300,000 and carried in full by New Found Gold Corp. The Undertaking is supported by the NLSF, Shoal Pond Cabin Owners Association, and Black Ridge Outfitters.

7.0 SUMMARY AND CONCLUSION

NLSF and NFG intend to carry out the proposed Undertaking in a safe, responsible, and environmentally compliant manner, consistent with applicable provincial and federal regulations. The Undertaking is not anticipated to result in any significant adverse environmental or socio-economic effects. It is expected to provide positive socio-economic benefits by ensuring safe

public access and continued use of the Shoal Pond Forestry Access Road, while supporting the operational needs of the Hammerdown Mine.

APPENDIX A

Bridge Replacement Permit

Commercial Cutting Permit

Notification to NLSF

PERMIT TO ALTER A BODY OF WATER

Pursuant to the *Water Resources Act*, SNL 2002 cW-4.01, specifically Section(s) 48

Date: **JULY 07, 2025**

File No: **525**

Permit No: **ALT14422-2025**

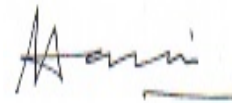
Permit Holder: **Newfoundland and Labrador Snowmobile Federation
7 Wellon Drive
Deer Lake NL A8A 2G6
groomers@nlsf.org**

Attention: **Stephen Appleby**

Re: **Town of Kings Point - Fox Pond Brook - Replacement of Small Bridge**

Permission is hereby given for : **the removal of existing timber bridge and the installation of one (1) - 9.14 meter pre-fabricated steel girder bridge across Fox Pond Brook near the Town of King's Point to provide access to existing snowmobile trails in reference to the application received on May 8, 2025.**

- This Permit does not release the Permit Holder from the obligation to obtain appropriate approvals from other concerned municipal, provincial and federal agencies.
- The Permit Holder must obtain the approval of the Crown Lands Administration Division if the project is being carried out on Crown Land.
- This Permit is subject to the terms and conditions indicated in Appendices A and B (attached).
- It should be noted that prior to any significant changes in the design or installation of the proposed works, or in event of changes in ownership or management of the project, an amendment to this Permit must be obtained from the Department of Environment and Climate Change under Section 49 of the *Water Resources Act*.



(for) MINISTER

APPENDIX A
Terms and Conditions for Permit

Small Bridges

1. A 9.14 meter bridge may be constructed across Fox Pond Brook, near the Town of King's Point.
2. The use of creosote treated wood is strictly prohibited within 15 metres of all bodies of fresh water in the province.
3. The crossing structure must provide adequate capacity to safely discharge flood flows without causing backwater effects upstream or increased flow velocity downstream.
4. Bridge abutments must be set back 0.5 metres from the normal edge of a watercourse to prevent constriction during high flow conditions.
5. The natural course of any stream must not be altered.
6. Infilling must not cause increased water elevation upstream or increase flow velocity downstream of the site. Reduction of the natural cross sectional area of any watercourse is not permitted.
7. The upstream and downstream sides of abutments must be protected with rip-rap, concrete or heavy timber to prevent erosion and scouring.
8. Where pumping is used to bypass flow, cofferdams must be installed both above and below areas of construction. The Permit Holder must provide pumps with sufficient capacity to prevent washout of cofferdams.
9. Cofferdams must be properly designed and constructed of suitable materials to prevent leakage and to resist loss of any material as a result of erosion. Cofferdams must be removed upon completion of their intended function. All material must be removed carefully to prevent disturbance of the water body and to prevent water quality degradation.
10. Abutments and piers must be constructed in the dry and during times of low flow.
11. The bridge(s) must have the following minimum dimensions:

Crossing Name / No.	Span (m)	Waterway Opening (m ²)	Freeboard (m)
Fox Pond Brook	9.14	22.3	1.0

General Alterations

12. Any work that must be performed below the high water mark must be carried out during a period of low water levels.
13. Any flowing or standing water must be diverted around work sites so that work is carried out in the dry.
14. Water pumped from excavations or work areas, or any runoff or effluent directed out of work sites, must have silt and turbidity removed by settling ponds, filtration, or other suitable treatment before discharging to a body of water. Effluent discharged into receiving waters must comply with the *Environmental Control Water and Sewage Regulations, 2003*.
15. All operations must be carried out in a manner that prevents damage to land, vegetation, and watercourses, and which prevents pollution of bodies of water.

16. The use of heavy equipment in streams or bodies of water is not permitted. The operation of heavy equipment must be confined to dry stable areas.
17. All vehicles and equipment must be clean and in good repair, free of mud and oil, or other harmful substances that could impair water quality.
18. During the construction of concrete components, formwork must be properly constructed to prevent any fresh concrete from entering a body of water. Dumping of concrete or washing of tools and equipment in any body of water is prohibited.
19. Wood preservatives such as penta, CCA or other such chemicals must not be applied to timber near a body of water. All treated wood or timber must be thoroughly dry before being brought to any work site and installed.
20. Any areas adversely affected by this project must be restored to a state that resembles local natural conditions. Further remedial measures to mitigate environmental impacts on water resources can and will be specified, if considered necessary in the opinion of this Department.
21. The bed, banks and floodplains of watercourses, or other vulnerable areas affected by this project, must be adequately protected from erosion by seeding, sodding or placing of rip-rap.
22. All waste materials resulting from this project must be disposed of at a site approved by the Department of Digital Government and Service NL.
23. Periodic maintenance such as painting, resurfacing, clearing of debris, or minor repairs, must be carried out without causing any physical disruption of any watercourse. Care must be taken to prevent spillage of pollutants into the water.
24. The owners of structures are responsible for any environmental damage resulting from dislodgement caused by wind, wave, ice action, or structural failure.
25. Sediment and erosion control measures must be installed before starting work. All control measures must be inspected regularly and any necessary repairs made if damage is discovered.
26. Fill material must be of good quality, free of fines or other substances including metals, organics, or chemicals that may be harmful to the receiving waters.
27. The attached Completion Report (Appendix C) for Permit No. 14422 must be completed and returned to this Department upon completion of the approved works. Pictures must be submitted along with the completion report, showing the project site prior to and after development.
28. This Permit is valid for two years from the date of issue. Work must be completed by that date or the application and approval procedure must be repeated.
29. The location of the work is highlighted on the Location Map for this Permit attached as Appendix D.
30. This licence/permit does not constitute an acknowledgement of interest in any land claims adjacent.

APPENDIX B
Special Terms and Conditions for Permit

1. The Permit Holder and its agent(s), subcontractor(s), and consultant(s) shall keep all systems and works in good condition and repair and in accordance with all laws, by-laws, directions, rules and regulations of any governmental authority. The Permit Holder or its agent(s), subcontractor(s), or consultant(s) shall immediately notify the Minister if any problem arises which may threaten the structural stability of the systems and works, endanger public safety and/or the environment or adversely affect others and/or any body of water either in or outside the said Project areas. The Permit Holder and its agent(s), subcontractor(s), and consultant(s) shall be responsible for all damages suffered by the Minister and Government resulting from any defect in the systems and works, operational deficiencies/inadequacies, or structural failure.
2. The Permit Holder and its agent(s), subcontractor(s), and consultant(s) shall operate the said Project and its systems and works in a manner which does not cause any water related and/or environmental problems, including but not limited to problems of erosion, deposition, flooding, and deterioration of water quality and groundwater depletion, in or outside the said Project areas. The Permit Holder and its agent(s), subcontractor(s), and consultant(s) shall be responsible for any and all damages associated with these problems caused as a result of changes, deficiencies, and inadequacies in the operational procedures by the Permit Holder or its agent(s), subcontractor(s), or consultant(s).
3. If the Permit Holder or its agent(s), subcontractor(s), or consultant(s) fails to perform, fulfil, or observe any of the terms and conditions, or provisions of this Permit, as determined by this Department, the Minister may, without notice, amend, modify, suspend or cancel this Permit in accordance with the *Water Resources Act*.
4. The Permit Holder and its agent(s), subcontractor(s), and consultant(s) indemnify and hold the Minister and Government harmless against any and all liabilities, losses, claims, demands, damages or expenses including legal expenses of any nature whatsoever whether arising in tort, contract, statute, trust or otherwise resulting directly or indirectly from granting this Permit, systems and works in or outside the said Project areas, or any act or omission of the Permit Holder or its agent(s), subcontractor(s), or consultant(s) in or outside the said Project areas, or arising out of a breach or non-performance of any of the terms and conditions, or provisions of this Permit by the Permit Holder or its agent(s), subcontractor(s), or consultant(s).
5. This Permit is subject to all provisions of the *Water Resources Act* and any regulations in effect either at the date of this Permit or hereafter made pursuant thereto or any other relevant legislation enacted by the Province of Newfoundland and Labrador in the future.
6. This Permit shall be construed and interpreted in accordance with the laws of the Province of Newfoundland and Labrador.

- cc: Ms. Paula Dawe, P.Eng.
Manager, Water Rights, Investigations and Modelling Section
Water Resources Management Division
Department of Environment and Climate Change
P.O. Box 8700
4th Floor, West Block, Confederation Building
St. John's, NL A1B 4J6
pauladawe@gov.nl.ca
- cc: Central Regional Lands (Grand Falls-Windsor)
Mr. Dave A. N. Frampton, Land Management Specialist
Crown Lands Administration Division
Department of Fisheries, Farming, and Natural Resources
3 Cromer Avenue, 4th Floor Provincial Building
Grand Falls-Windsor, NL A2A 1W9
DavidFrampton@gov.nl.ca
- cc: Fish and Fish Habitat Protection Program
Aquatic Ecosystems Branch
Fisheries and Oceans Canada
P.O. Box 5667
St. John's, NL A1C 5X1
dfo.fppnl-ppptnel.mpo@dfo-mpo.gc.ca
- cc: Town of King's Point
Ms. Marie Cumming
44 Main Street
P.O. Box 10
King's Point, NL A0J 1H0
kpcouncil@eastlink.ca

Appendix C - Completion Report

Pursuant to the *Water Resources Act*, SNL 2002 cW-4.01, specifically Section(s) 48

Date: **JULY 07, 2025**

File No: **525**

Permit No: **ALT14422-2025**

Permit Holder: **Newfoundland and Labrador Snowmobile Federation
7 Wellon Drive
Deer Lake NL A8A 2G6
groomers@nlsf.org**

Attention: **Stephen Appleby**

Re: **Town of Kings Point - Fox Pond Brook - Replacement of Small Bridge**

Permission was given for : **the removal of existing timber bridge and the installation of one (1) - 9.14 meter pre-fabricated steel girder bridge across Fox Pond Brook near the Town of King's Point to provide access to existing snowmobile trails in reference to the application received on May 8, 2025.**

I (the Permit Holder named above or agent authorized to represent the Permit Holder) do hereby certify that the project described above was completed in accordance with the plans and specifications submitted to the Department of Environment and Climate Change and that the work was carried out in strict compliance with the terms and conditions of the Permit issued for this project.

Date: _____ Signature: _____

This completion report must be completed and forwarded to the following address upon completion of the approved work.

Department of Environment and Climate Change
Water Resources Management Division
PO Box 8700
St. John's NL A1B 4J6

APPENDIX D
Location Map for Permit

Near Town of King's Point - Fox Pond Brook Bridge Replacement



COMMERCIAL CUTTING PERMIT 2025

Permit Number :25-09-01715

Western	09	Springdale	COM_SW-Springdale	2025/06/16
Region	District	Zone	W.C.	Date Issued

Under and by virtue of The Forestry Act , Permission is hereby granted to:

Name:	Stephen Appleby	Phone:	(709) 635-4396
Address:	Newfoundland & Labrador Snowmobile Federation 7 Wellon Drive	Driver's Licence #:	A250900577

To cut timber to the conditions and restrictions as stated below:

Total Volume to be harvested:	softwood	100m³
	hardwood	25m³

Stumpage Rates:

Sawlogs (m3)	\$5.56 per m3
Pulpwood solid	\$5.56 per m3
Fuelwood solid	\$5.56 per m3

Location where timber is to be cut:	See Special Conditions for Map Location
Location where timber must be piled for scaling:	Roadside/Millyard

Standard Conditions:

- All Commercial Cutting Permit holders must have prior written approval from forestry officials, before moving harvesting operations to alternate operating areas identified within this permit.
- All harvesting equipment must be equipped with a fully-charged, 4.5 kilogram fire extinguisher at all times.
- During the cutting and removal of timber, permit holders must adhere to all requirements of the Departments ISO 14001:2015 Environmental Management System, all Standard Operating procedures and Emergency Response procedures.
- All equipment associated with harvesting operations conducted under this commercial cutting permit, shall be removed from the operating area upon permit expiry, unless otherwise agreed to by a Forestry Official.
- Cutting is NOT permitted within 100 metres of the centerline of any routed highway unless permission is provided under a special condition of this permit.
- The cutting of White Pine (*Pinus strobus*) or Red Pine (*Pinus resinosa*), regardless of tree condition (i.e. dead or alive, standing or felled) is NOT permitted unless express permission has been provided by the District Ecosystem Manager or designate.

Special Condition: This is a cutting permit for the widening of an existing trail bypassing the Shoal Pond Access Road near Kings Point. Royalty rate will start @ \$9.29 per cubic meter when harvesting PCT (precommercial thinnings)

This permit is effective starting: **2025/06/16** and expires **2025/12/31**

Fee for the issuance of this permit is: **\$50.00**

Payment Method: **Visa**



FORESTRY OFFICIAL



Government of Newfoundland and Labrador
Department of Fisheries, Forestry, Agriculture

Date: June 16 /2025

Stephen Appleby
Newfoundland & Labrador Snowmobile Federation
7 Wellon Drive
Deer Lake, NL.
A8A 2G6

Dear Permit Holder:

After reviewing your request for a Commercial Cutting Permit, the Department has decided to proceed with the issuance of the permit (25-09-01715). However, there are a number of important requirements and reminders that you need to be aware of:

1. You are required to have a spill kit on site while harvesting (**During any time of the year**) and also an operating permit and adequate fire suppression equipment during the fire season (**May 01-Sept. 30**).
2. As with any commercial permit, you will be required to submit quarterly reports on the 20th of the month following the quarter whether you harvested any timber or not. (Blank reports will be provided)
3. All timber harvested must be scaled by a certified scaler and the volumes submitted on the reports.
4. All royalties due must be submitted with the reports.
5. Any timber removed from the operating area and used for commercial purposes must have a Commercial Load Slip completed pertaining to that timber. (Slips will be provided by the Department at your request).

Please feel free to contact the District Office (673-3821) regarding any concerns or questions.

Sincerely,


Conservation Officer IV
Rick Clarke

cc: Bradley White, District Ecosystem Manager, Bishops Falls

FOREST MANAGEMENT DISTRICTS 9 AND 12
DEPARTMENT OF FISHERIES, FORESTRY AND AGRICULTURE
P.O. Box 220
SPRINGDALE, NL
AOJ 1T0

CONDITIONS OF CROWN COMMERCIAL CUTTING PERMIT PURSUANT TO SECTION 28(F) OF THE
FORESTRY ACT (RSNL1990 CHAPTER F-23)

THE FOLLOWING CONDITIONS APPLY TO YOUR CUTTING PERMIT 25-09-01715 AND AS SUCH ARE
CONSIDERED REGULATIONS UNDER SECTION 3(3) OF THE CUTTING OF TIMBER REGULATIONS.

GENERAL HARVESTING COMMERCIAL CUTTING PERMIT CONDITIONS

1. **The permit holder shall establish by flagging, blazing or painting a 30-metre**, no harvest buffer zone around all water bodies that are identified on the latest 1:50,000 topographic maps, around water bodies greater than **2.0 metres** in width that do not appear on the maps and water bodies identified on your cutting area maps. Where wider buffer widths on water bodies are required these will be indicated on your cutting area map(s). Where the slope is greater than 30% there shall be a no-harvest buffer of **30 m + (1.5 x % slope)**. All equipment or machinery is prohibited from entering waterbodies; thus, structures must be created to cross over such waterbodies. Every reasonable effort will be made to identify intermittent streams and they will be subject to this buffer requirement.

The following specified buffer requirements in the following circumstances are to be established and no harvesting shall occur within the buffer zones:

- a 50-metre, no-cut, treed buffer will be maintained around known black bear denning sites (winter) or those encountered during harvesting. These den sites must be reported to the Wildlife Division.

5. Above ground storage tanks shall be surrounded by a dyke. The dyked area will contain not less than 110% of the capacity of the tank. The base and walls of the dyke shall have a impermeable lining of clay, concrete, solid masonry or other material, designed, constructed and maintained to be liquid tight to a permeability of 25L/m²/d. There shall be a method to eliminate water accumulations inside the dyke.
6. Skidding/portering/forwarding through any waterbody is prohibited.
7. Any forestry operation that directly or indirectly results in silt entering a waterbody must be dealt with immediately (A Forestry Official at the Springdale or Millertown office must be notified within 24 hours). A forestry official may suspend or stop all or part of your operation to stop silt or debris entering a waterbody until remedial action has been taken to stop and ensure that the situation causing the silt and debris entering the waterbody has been rectified. Failure to comply with the request of the forestry official is a breach of permit conditions.
8. Woody material of any kind (trees, slash, sawdust, slabs, etc.) is not permitted to enter a waterbody. Woody material on ice within the high water floodplain of any waterbody is prohibited.
9. To minimize erosion and sedimentation, waterbody crossings shall:
 - i) have stable approaches;
 - ii) be at right angles to the waterbody;
 - iii) be located where channels are well defined, unobstructed, and straight;
 - iv) be at a narrow point along the waterbody;
 - v) allow room for direct gentle approaches;
 - vi) have all mineral soil exposed during bridge construction and culvert installation seeded with grass.

construction of diversion ditches for water run-off) are to be maintained while the skid trail is in use. All temporary crossings are to be removed at the end of the operating season unless the District Manager agrees to extend the life of the crossing for more than one season.

15. If your operation causes rutting and site degradation a Forestry Official may require rehabilitation of these sites. When you have been directed by a Forestry Official to rehabilitate areas associated with your operation it is a breach of these conditions to refuse the request and it shall be completed in a timely fashion.

16. Harvesting is permitted only in those areas as indicated on your harvest areas maps.

General Road Building Commercial Cutting Permit Conditions For Commercial Operator Constructed Roads

1. Unless otherwise specified by a Forestry Official forest access roads, borrow pits and quarries shall avoid:

- i) wetlands, deltas, and floodplain or fluvial wetlands;
- ii) terrain with high erodibility potential;
- iii) known sensitive wildlife areas such as;

- calving grounds, post calving areas, caribou migration routes, caribou rutting areas, and winter areas,
- waterfowl breeding areas and colonial nesting sites,
- established moose yards by one kilometre,
- eagle and osprey nest sites,
- where site conditions and engineering permits, main haul roads

should be one kilometre from permanent water bodies and all other roads by not more than 100 metres,

- endangered or endemic species or sub-species of flora or fauna and other areas to be determined by qualified authorities;

- iv) known sensitive fish areas such as:
 - spawning and rearing grounds;
- v) historically significant areas such as:
 - archaeological sites;

7. When a skid trail is on steep ground and is no longer in use, cut-off ditches and push lanes must be created. The frequency will be determined by the District Manager.
8. There shall be no bulldozing of standing merchantable timber or poor utilization of merchantable softwoods and hardwoods during cutting of the right-of-way.
9. Excavations required for the construction of piers, abutments or multi-plate culverts shall be completed in the dry. (Where exceptions occur, consultation with District manager is required).
10. On a site specific basis, roads can be decommissioned and/or rehabilitated as directed by a forestry official. Decommissioning is defined as barring access; rehabilitation means to re-vegetate the road.
11. A "no-grub" zone of 30 metres of undisturbed ground vegetation must be maintained around any water body crossing to minimize the damage to the lower vegetation and organic cover, thus reducing erosion potential. Manual clearing at waterbody crossing sites should be used to remove or control vegetation. Right-of-way widths at waterbody crossings should be kept to a minimum.
12. Fill materials for road building must not be obtained from any waterbody or from within the floodplain of any waterbody.
13. Trees are to be felled away from all waterbodies, and slash and debris should be piled above the high water mark so that it cannot enter waterbodies during periods of peak flow.
14. Equipment activity in water crossing areas is to be kept to a minimum. Whenever possible, any work is to be carried out from dry stable areas.

approval from a Forestry Official. An *application form* for forest access road construction can be obtained at the Springdale District Office.

Forest Resources Trail Upgrade Cutting Permit

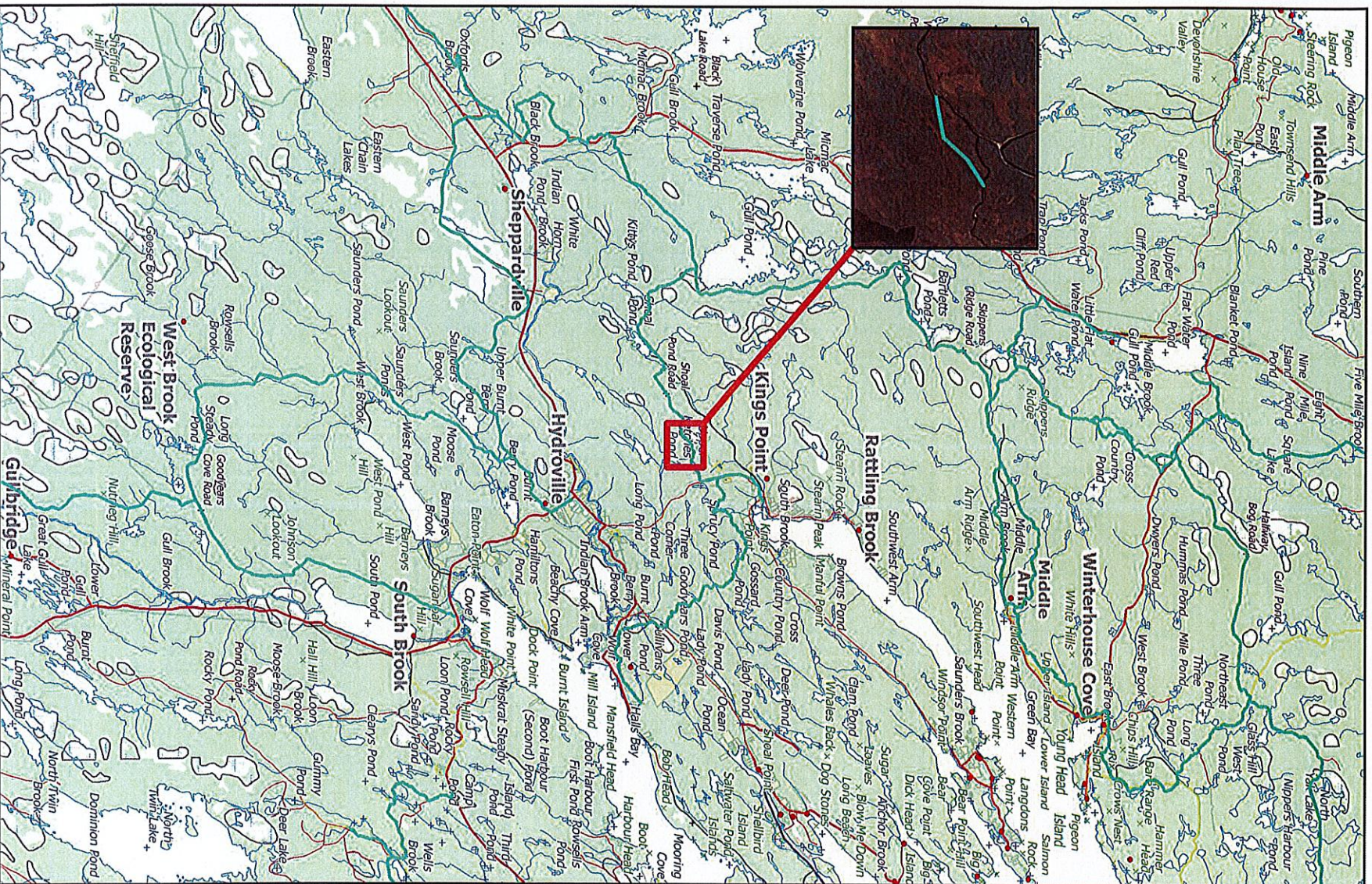
sub contract Springdale Forest Resources to upgrade NLSF trail (in red) between A and B points

Legend

- Hammerdown Mine (Maritime Resources)
- NLSF Groomed Trail
- Trail Upgrade End
- Trail Upgrade Start

Hammerdown Mine (Maritime Resources)

Trail Upgrade End



Commercial Cutting Permit Quarterly Return



Name:	Nlfd & Labrador Snowmobile Federation-Stephen Appleby	Permit Number:	25-09-01715
District:	9	Date of Return:	

Period Ending: ☐ Jun 30 ☐ Sept 30 ☐ Dec 31 ☐ Mar 31 Note: All Volumes shall be recorded in SOLID CUBIC METERS (m³) unless otherwise specified

Timber	Operating Area/ Block ID	Royalty Rate (\$5.56 or \$9.29)	Royalty Reduction Class (provide specifics)	Adjusted Rate (\$)	Volume (m³)	Royalty Due	Purchaser	Purchaser Paid	Hardwoods
Sawlogs								<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Sawlogs								<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Sawlogs								<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Pulpwood								<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Pulpwood								<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Pulpwood								<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Fuelwood								<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Fuelwood								<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Fuelwood								<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Construction Timber								<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Dead Wood								<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Burnt Timber								<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
TOTAL									
Comments/Remarks:									

I declare that the above return is true and correct

Receipt Number:

Signed:

Amount: \$

Dept Official:

Abbreviations for Reduction Classes	Contractor Built Road =	CBR	Snow Clearing =	SC
	Salvage wood =	SW	Isolated Stands =	IS
	Low Volume Stand =	LVS	Slope =	SL
	Environmentally Sensitive Equipment =	ESE		

Commercial Cutting Permit Quarterly Return



Name:	Nlfd & Labrador Snowmobile Federation-Stephen Appleby	Permit Number:	25-09-01715
District:	9	Date of Return:	

Period Ending: ☐ Jun 30 ☐ Sept 30 ☐ Dec 31 ☐ Mar 31

Note: All Volumes shall be recorded in SOLID CUBIC METERS (m³) unless otherwise specified

Timber	Operating Area/ Block ID	Royalty Rate (\$5.56 or \$9.29)	Royalty Reduction Class (provide specifics)	Adjusted Rate (\$)	Volume (m ³)	Royalty Due	Purchaser	Purchaser Paid	Hardwoods
Sawlogs								<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Sawlogs								<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Sawlogs								<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Pulpwood								<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Pulpwood								<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Pulpwood								<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Fuelwood								<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Fuelwood								<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Fuelwood								<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Construction Timber								<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Dead Wood								<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Burnt Timber								<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
TOTAL									
Comments/ Remarks:									

I declare that the above return is true and correct

Receipt Number:

Signed:

Amount: \$

Dept Official:

Abbreviations for Reduction Classes

Contractor Built Road =

Salvage wood =

Low Volume Stand =

Environmentally Sensitive Equipment =

CBR

SW

LVS

ESE

Snow Clearing =

Isolated Stands =

Slope =

SC

IS

SL

Commercial Cutting Permit Quarterly Return



Name:	Nlfd & Labrador Snowmobile Federation-Stephen Appleby	Permit Number:	25-09-01715
District:	9	Date of Return:	

Period Ending: ☐ Jun 30 ☐ Sept 30 ☐ Dec 31 ☐ Mar 31

Note: All Volumes shall be recorded in SOLID CUBIC METERS (m³) unless otherwise specified

Timber	Operating Area/ Block ID	Royalty Rate (\$5.56 or \$9.29)	Royalty Reduction Class (provide specifics)	Adjusted Rate (\$)	Volume (m ³)	Royalty Due	Purchaser	Purchaser Paid	Hardwoods
Sawlogs								<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Sawlogs								<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Sawlogs								<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Pulpwood								<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Pulpwood								<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Pulpwood								<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Fuelwood								<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Fuelwood								<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Fuelwood								<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Construction Timber								<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Dead Wood								<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Burnt Timber								<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
TOTAL									
Comments/ Remarks:									

I declare that the above return is true and correct

Receipt Number:

Signed:

Amount: \$

Dept Official:

Abbreviations for Reduction Classes	Contractor Built Road =	CBR	Snow Clearing =	SC
	Salvage wood =	SW	Isolated Stands =	IS
	Low Volume Stand =	LVS	Slope =	SL
	Environmentally Sensitive Equipment =	ESE		



Government of Newfoundland and Labrador
Environment and Climate Change
Environmental Assessment Division

August 28, 2025

COR-2025-3294-1

File Ref No. 200.20.3597
Application No. 164361

Newfoundland and Labrador Snowmobile Federation
Stephen Appleby
7 Wellon Drive
Deer Lake, NL A8A2G6
groomers@nlsf.org

Project: Newfoundland and Labrador Snowmobile Federation - King's Point
Location: Southwest of King's Point

Please be advised that the Environmental Assessment Regulations, 2003, section 35(1)(b) define your project as an undertaking requiring environmental assessment pursuant to the **Environmental Protection Act**, SNL 2002, cE-14.2 (the **Act**).

You are therefore required to register the project with the Department of Environment and Climate Change. For more information about the environmental assessment process, and how to prepare a registration document, please consult our guidance document titled "Environmental Assessment – A Guide to the Process" at <https://www.gov.nl.ca/ecc/env-assessment/>. It is recommended that a draft of the registration document be submitted for review prior to registration.

Under the provisions of the **Act**, undertakings may not proceed and other government agencies may not issue relevant authorizations until a decision is rendered by the Minister of Environment and Climate Change (the Minister). A decision by the Minister will be provided to you within 45 days following registration of your project.

In accordance with Government's Proactive Disclosure Initiative, all Ministerial decision letters related to your undertaking will be posted online subject to any exceptions to disclosure provided under the **Access to Information and Protection of Privacy Act**, 2015.

If you have any questions, please contact Kaitlyn Gladney, Environmental Scientist at (709) 729-5498 or kaitlyngladney@gov.nl.ca.

Sincerely,

for

Joanne Sweeney, Director
Environmental Assessment Division

APPENDIX B

NFG's (formerly Maritime's) – Hammerdown Gold Project Environmental Protection Plan



MARITIME RESOURCES

**HAMMERDOWN GOLD PROJECT
ENVIRONMENTAL PROTECTION PLAN**

Table of Contents

LIST OF TABLES.....	III
LIST OF FIGURES	III
LIST OF ABBREVIATIONS AND TERMINOLOGY	IV
LIST OF APPENDICES	IV
1.0 INTRODUCTION.....	5
1.1 Location and Site Description	5
1.2 Project Overview	8
1.3 Purpose of the EPP	10
1.4 Objectives of the EPP	10
1.5 Organization of the EPP	10
1.6 Roles and Responsibilities	11
1.6.1 Vice President – Environment and Sustainability	11
1.6.2 Project Manager	12
1.6.3 Other Site Personnel and Contractors	12
1.7 Orientation	12
2.0 SITE ACTIVITIES.....	14
3.0 REGULATORY REQUIREMENTS	15
3.1 Potential Approvals, Authorizations and Permits.....	15
3.2 Environmental Compliance Monitoring.....	16
3.2.1 Site Inspections	16
3.2.2 Monitoring.....	16
3.3 Rehabilitation of Work Sites	21
3.4 Reporting	21
3.4.1 Internal Communication	21
3.4.2 External Communication	21
4.0 ENVIRONMENTAL PROTECTION PROCEDURES	23
4.1 Surveying.....	23
4.2 Buffer Zones	25
4.3 Laydown and Storage Areas	25
4.4 Clearing Vegetation	26
4.5 Grubbing.....	28
4.6 Erosion	29
4.7 Water Withdrawal and Supply	30
4.8 Watercourse (Stream) Crossings	30

4.9	Exploration Drilling on Land, Water Well Drilling and Pump Tests	33
4.10	Trenching.....	34
4.11	Pumps, Compressors, and Generators	35
4.12	Dewatering Work Areas and Site Drainage	36
4.13	Equipment Use and Maintenance	36
4.14	Storage, Handling, and Transferring of Fuel and Other Hazardous Material	37
4.15	Propane	40
4.16	Waste Disposal.....	40
4.17	Sewage Disposal.....	41
4.18	Hazardous Waste Disposal	42
4.19	Vehicle Traffic.....	43
4.20	Dust Control.....	44
4.21	Noise Control.....	44
4.22	Drilling and Blasting	44
5.0	CONTINGENCY PLANS.....	47
5.1	Petroleum and Hazardous Material Spills	47
5.2	Fire and Explosion.....	50
5.3	Wildlife Encounters	51
5.4	Discovery of Historic Resources.....	52
5.5	Natural Disasters	53
6.0	EPP CONTROL REVISIONS	55
7.0	CONTACT LIST	56
8.0	REFERENCE MATERIAL	58
9.0	SIGNATURE PAGE	59

LIST OF TABLES

Table 3.1	Potential permits, Approvals and/or Authorizations.....	15
Table 3.2	Environmental Compliance Standards	18
Table 4.1	Recommended Minimum buffers for Activities near Watercourses.....	25
Table 7.1	Contact Information	56

LIST OF FIGURES

Figure 1-1	– Hammerdown Gold Project Location	7
------------	--	---


Figure 1-2 – Hammerdown Gold Project Site Layout	9
--	---

LIST OF ABBREVIATIONS AND TERMINOLOGY

ATV	All-terrain Vehicle
CEPA	Canadian Environmental Protection Act
CEO	Chief Executive Officer
C of A	Certificate of Approval
CWS	Canadian Wildlife Service
DECC	Department of Environment and Climate Change
DFO	Department of Fisheries and Oceans
DP	Development Plan
EPP	Environmental Protection Plan
FS	Feasibility Study
LOM	Life of Mine
MSDS	Material Safety Data Sheets
NLFFA	Newfoundland and Labrador Fisheries, Forestry and Agriculture
OHS	Occupational Health and Safety
PAO	Provincial Archaeology Office
PPD	Pollution Prevention Division
RCP	Rehabilitation and Closure Plan
ROM	Run of Mine
RSNL	Revised Statutes of Newfoundland and Labrador
TDG	Transportation of Dangerous Goods
tpd	tonnes per day
UTM	Universal Transverse Mercator
VP	Vice President
WaMP	Water Management Plan
WHMIS	Workplace Hazardous Materials Information System

LIST OF APPENDICES

APPENDIX A	CONTROLLED COPY DISTRIBUTION LIST
APPENDIX B	FUEL AND HAZARDOUS MATERIALS SPILL REPORT FORM
APPENDIX C	DOCUMENT CONTROL AND AMENDMENT LIST
APPENDIX D	REVISION REQUEST FORM

	ENVIRONMENTAL PROTECTION PLAN	Version: 2.0
	Approved By: Perry Blanchard	Date: April 30, 2025

1.0 INTRODUCTION

Maritime Resources Corp. (Maritime) is focused on gold exploration and development in the historic Baie Verte mining district of Newfoundland and Labrador with over 450 km² of mineral claims and mining leases. The company's primary assets include the existing Hammerdown Gold Project (the Project), the Point Rousse project (including the fully permitted Pine Cove Mill), and several highly prospective gold exploration projects across the district (Figure 1). Maritime completed a Feasibility Study (FS) (JDS Energy & Mining Inc., 2022) in 2022 for the re-start of the Hammerdown mine as a high-grade open pit project.


An Environmental Protection Plan (EPP) for the Hammerdown Project is required as a condition of release from Environmental Assessment (EA) in 2021 (Maritime Resources Corp., 2020). This EPP will outline the prevention and mitigation measures to be applied to limit potential adverse environmental effects associated with construction and operation activities at the Project. The EPP is considered a working document for use in the field by Project personnel and contractors that identifies and provides guidance for avoidance and mitigation of potentially adverse environmental effects of Project construction and operations activities. The EPP, and any revisions or updates, will be provided to all contractors and subcontractors who do work at the Project site. All contractors and subcontractors will confirm they have read and understood the requirements outlined in the EPP.

In 2023, the company completed the acquisition of the Point Rousse project from Signal Gold, which houses the Pine Cove Mill that will process ore material from the Project. The Point Rousse property and associated operations are captured under a separate existing EPP.

1.1 Location and Site Description



The Project is located approximately 5 kilometers southwest of the Town of King's Point and 15 kilometers northwest of the Town of Springdale, within the Baie Verte mining district of Newfoundland and Labrador, Canada. The project is centered at Universal Transverse Mercator (UTM) coordinates 554475 East, 5488890 North (NAD83, UTM Zone 21). Situated on Crown and municipal land within Maritime Resources Corp.'s Green Bay Property, the site encompasses Mining Leases 191 and 237, with all associated leases and licenses currently in good standing. The area is accessible via a 2.6 km all-weather road connecting to the paved King's Point highway.

The Hammerdown site is situated within the Central Newfoundland Forest Ecoregion, a boreal forest region characterized by black spruce, balsam fir, and tamarack stands. This ecoregion experiences the highest summer temperatures and the lowest winter temperatures in the province, resulting in high evapotranspiration rates and definite soil-moisture deficiency in its

	ENVIRONMENTAL PROTECTION PLAN	Version: 2.0
	Approved By: Perry Blanchard	Date: April 30, 2025


northern areas. The dominant forest type is Hylocomium-Balsam Fir, though forest fires have historically played a significant role in shaping the landscape (Meades, 1990). As a result, Balsam Fir-Feathermoss forests have been largely converted to black spruce stands, with richer sites supporting white birch and aspen. Repeated burning has also led to the formation of Kalmia-dominated dwarf shrub barrens, while raised bogs are the characteristic wetland type.



PROJECT TITLE				DRAWING TITLE		 MARITIME RESOURCES	
HAMMERDOWN GOLD PROJECT				PROJECT LOCATION			
REPORT TITLE				CREDITS/NOTES		 GEMTEC CONSULTING ENGINEERS AND SCIENTISTS	
ENVIRONMENTAL PROTECTION PLAN				<p>1. COORDINATE SYSTEM: NAD 1983 UTM Zone 21N</p> <p>2. Sources: NRCAN, Esri Canada, and Canadian Community Maps contributors. Sources: Esri, Mapbox, Airbus DS, USGS, NGA, NASA, CCGAR, N Robinson, NCEAS, NLS, CS, NNA, Geodatasystemen, Rijkswaterstaaf, GSA, Geoland, FEMA, Intermap, and the GIS user community, Esri Canada</p> <p>3. Contains information licenced under the Open Government Licence - Canada</p> <p>4. Contains information licenced under the Open Government Licence - Newfoundland & Labrador</p>			
DRAWN BY	CHECKED BY	DRAWING NO.	REVISION NO.	PROJECT NO.	DATE		
ARS	ST	FIGURE 1-1	REV0	100013.008	4/16/2025		



GEMTEC
CONSULTING ENGINEERS
AND SCIENTISTS

	ENVIRONMENTAL PROTECTION PLAN	Version: 2.0
	Approved By: Perry Blanchard	Date: April 30, 2025

The site's surrounding environment supports diverse wildlife, including moose, black bear, snowshoe hare, and several migratory and resident bird species. Additionally, it falls within the known range of the federally endangered Little Brown Myotis (*Myotis lucifugus*) and Northern Myotis (*Myotis septentrionalis*), which may roost in tree cavities or rock crevices and forage along forest edges and waterbodies. Maritime is committed to adhering to all applicable Wildlife Division regulations and the *Wildlife Act* (RSNL 1990, c W-8) to protect the surrounding environment, recognizing that compliance with the EPP is critical to maintaining ecological integrity while ensuring responsible project operations.

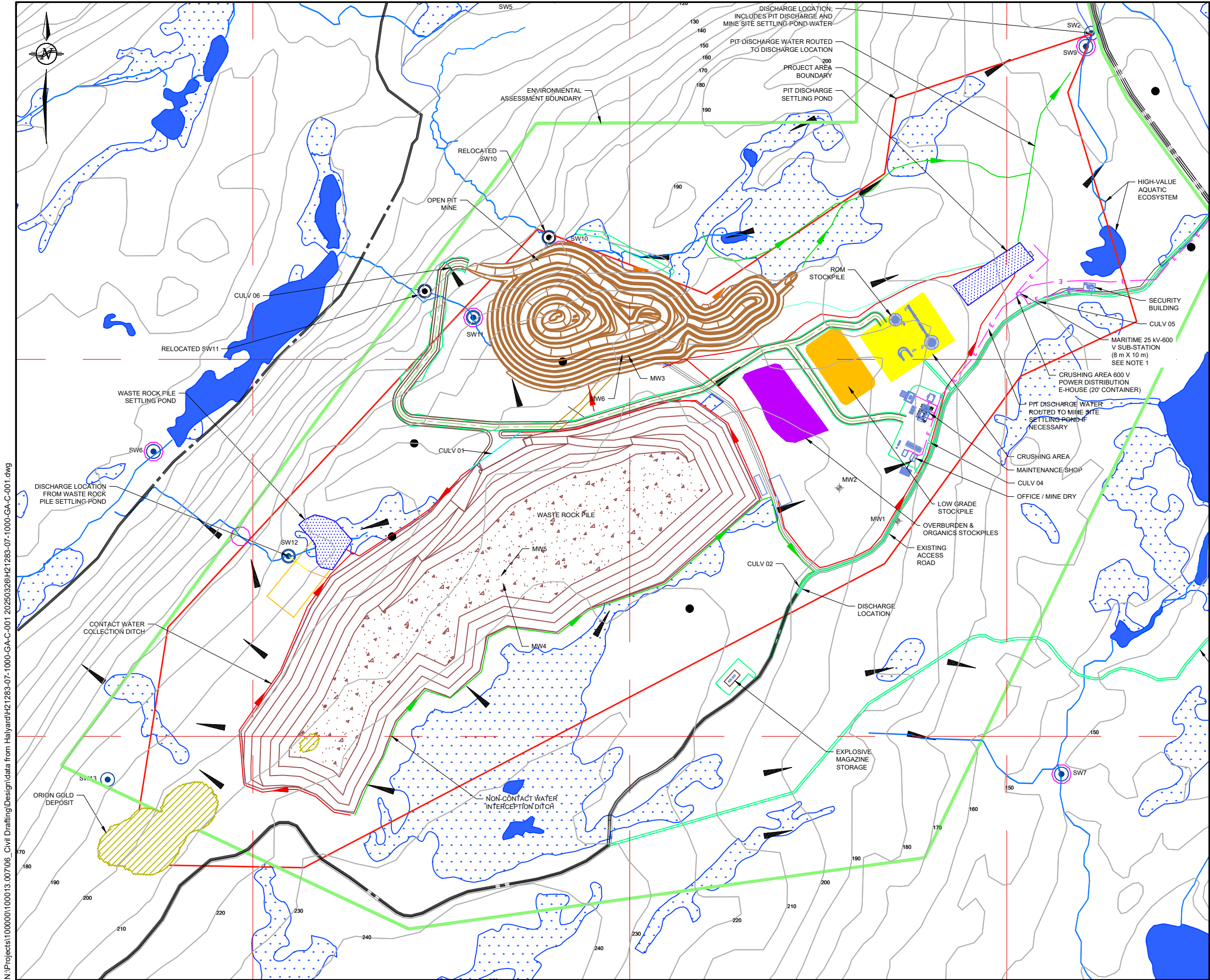
1.2 Project Overview

The Project involves the construction, operation, closure, and decommissioning of an open pit gold mine at the predominantly brownfield site of the historical Hammerdown Underground Mine. Processing activities at the Hammerdown site are simplistic in nature and only include primary crushing and the temporary stockpiling of the extracted ore material. No milling or secondary processing will be undertaken at the Hammerdown mine site.

All crushed ore will be trucked to the Pine Cove Mill located at Maritime's Point Rousse Project property, on the Point Rousse/Ming's Bight Peninsula, approximately 6 km northeast of the Town of Baie Verte (Figure 1). Milling of the Hammerdown ore and all Pine Cove operations are captured under the existing approved Pine Cove EPP, and other existing permits.

Run-of-mine (ROM) production at Hammerdown will be at a rate of 700 tonnes per day (tpd) for a Life of Mine (LOM) of eight years. The Project will include supporting infrastructure such as a waste rock storage area, water management infrastructure, access roads, electrical and communication infrastructure and temporary administrative and maintenance buildings (Figure 1-2). Electrical power will be sourced from the provincial grid, with the closest distribution point located approximately 1 km from the project site. The project is anticipated to produce approximately 310,000 ounces of gold over the LOM, with an average annual production of 52,000 ounces.

N:\Projects\1000001\100013.007\06_Civil Drafting\Design\data from Halyard\H21283-07-1000-GA-C-001.dwg



Legend:

- PROJECT SITE BOUNDARY
- SW# SURFACE WATER FIELD SURVEY LOCATION
- MW# MONITORING WELL
- WATERCOURSE
- WATER BODY
- WETLAND
- SETTLING POND
- CONTOUR ELEVATION
- DRAINAGE DIRECTION
- NON-CONTACT WATER DITCH
- CONTACT WATER DITCH
- PUMP FROM OPEN PIT
- CULVERT
- SURFACE LEASE BOUNDARY
- 25 kV OVERHEAD POWER LINE
- ENVIRONMENTAL ASSESSMENT BOUNDARY


Notes

1. MARITIME SUBSTATION LOCATION:
CSRS.UTM-21N
E 556,032 m
N 5,489,173 m

2. Preliminary site plan provided by HALYARD, Drawing number H21283-07-1000-GA-C-001 Dated: 2025.03.11

Date	APRIL 2025	Draw by	DH	Checked by	CH
Client					
Project	HAMMERDOWN GOLD PROJECT				
Drawing	HAMMERDOWN SITE LAYOUT				
Scale	1:10000 				
Project No.	100013.008	Drawing No.	FIGURE 1-2	Rev. No.	0

GEMTEC
CONSULTING ENGINEERS
AND SCIENTISTS

	ENVIRONMENTAL PROTECTION PLAN	Version: 2.0
	Approved By: Perry Blanchard	Date: April 30, 2025

1.3 Purpose of the EPP

This EPP provides specific guidance to ensure that company activities are conducted responsibly, and with minimal impact to the environment. Potential environmental concerns are discussed, and protection procedures related to the work activities are presented. The protection measures presented in this plan are practical, and apply to all personnel (i.e., Maritime employees, contractors, and suppliers) to reduce or eliminate potential adverse environmental effects. Instructions are also provided for addressing planned and unplanned activities or unwanted events associated with ongoing or new site work. Guidance in this EPP is based on best management practices to aid in the mitigation of any concerns identified, addresses compliance with legislation, and ensures the Company meets the expectations of stakeholders.

1.4 Objectives of the EPP


To ensure all activities are carried out in an environmentally responsible manner, this EPP has the following objectives:

- confirm commitments to reduce adverse environmental effects;
- document environmental concerns and identify appropriate protection measures;
- provide a reference document for personnel when planning and/or conducting site specific activities;
- provide direction to personnel in the event of accidental events;
- communicate changes to the EPP through the revision process;
- provide a reference to, and instructions for, Maritime to understand applicable legal and other requirements relative to appropriate environmental mitigation measures;
- provide a reference for Project personnel and regulators to facilitate the monitoring of EPP compliance;
- provide a means for Project personnel and regulators to recommend improvements to the EPP; and
- provide direction at the corporate level for ensuring commitments made in policy statements are implemented and monitored.

Any deviation from the procedures and commitments outlined in this EPP must be discussed with and approved by Maritime.

1.5 Organization of the EPP

This EPP has been developed for specific activities to be conducted in support of the work carried out on the Property. This EPP contains the following sections:

	ENVIRONMENTAL PROTECTION PLAN	Version: 2.0
	Approved By: Perry Blanchard	Date: April 30, 2025

- **Section 1.0** introduces the Project and outlines the overall purpose, objectives, organization, roles and responsibilities of those involved and environmental orientation requirements of this EPP;
- **Section 2.0** provides a description of planned site activities;
- **Section 3.0** lists the permits, approvals and authorizations that may be required for the work, and provides an overview of compliance monitoring;
- **Section 4.0** describes potential environmental concerns and environmental protection procedures associated with work activities;
- **Section 5.0** outlines the contingency plans for potential unplanned and accidental events;
- **Section 6.0** outlines the procedures for revising the EPP;
- **Section 7.0** provides a list of key personnel and regulatory contacts;
- **Section 8.0** lists references cited in the EPP, as well as a number of sources of further information; and
- **Section 9.0** contains a signature page for employee and contractor sign-off.

Supporting information and documents are provided in the appendices:

- Appendix A is a Controlled Copy Distribution List;
- Appendix B is a Fuel and Hazardous Materials Spill Report Form;
- Appendix C is a Document Control and Amendment List; and
- Appendix D is a Revision Request Form.


1.6 Roles and Responsibilities

This section outlines the roles and responsibilities of all parties involved with on-going and any new activities on the Property.

1.6.1 Vice President – Environment and Sustainability

Maritime's Vice President – Environment and Sustainability or designate will provide overall leadership and support of the EPP during all activities carried out on the Property. Specific responsibilities will be to:

- provide final approval for the EPP and any subsequent revisions;
- monitor and inspect all work associated with the site work activities;
- liaise with relevant government agencies and stakeholders as required;
- distribute the EPP and any revisions to all controlled distribution representatives identified on the list in Appendix B;
- direct and/or manage reviews of the EPP on an as-needed basis, and
- maintain overall document control.

	ENVIRONMENTAL PROTECTION PLAN	Version: 2.0
	Approved By: Perry Blanchard	Date: April 30, 2025

1.6.2 Project Manager

Maritime's designated Project Manager will report directly to the Chief Executive Officer (CEO) and manage all activities carried out on the Property. Specific duties will be to:

- act as Maritime's on-site representative responsible for environmental protection;
- hold initial orientation sessions for contractors and any other personnel to be involved in site activities;
- confirm on-site employees, contractors and sub-contractors are familiar with, and implement all aspects of the EPP including revisions, and its procedures;
- communicate proposed work activities with the CEO to ensure all applicable approvals, authorizations and permits can be obtained in a timely manner;
- monitor or designate a representative to monitor site work and any environmental protection measures for compliance with the EPP, and all regulatory requirements and commitments;
- report to the CEO any incidents of environmental non-compliance;
- support and/or manage periodic reviews of the EPP, and
- contact the appropriate regulatory agencies in the event of an environmental emergency.


1.6.3 Other Site Personnel and Contractors

All contractors, subcontractors and site personnel involved in Project work activities on the Property will:


- review and become familiar with all procedures contained in the EPP, including any revisions;
- follow and implement commitments noted in the EPP, including any regulatory conditions outlined in approvals, authorizations and permits;
- immediately report concerns, including any spill or other event that may have an adverse effect on the environment, to Maritime's Project Manager or designate;
- carry out clean-up, reclamation or restoration work as directed by Maritime's Project Manager or regulatory agencies; and
- provide feedback to Maritime's Project Manager regarding any changes they feel would improve the EPP.

1.7 Orientation

Through ongoing orientation and awareness training, Maritime will confirm that all personnel understand their roles and responsibilities, their specific work activities, as well as the potential environmental effects of proposed site activities. All workers will receive an orientation from an

	ENVIRONMENTAL PROTECTION PLAN	Version: 2.0
	Approved By: Perry Blanchard	Date: April 30, 2025

immediate supervisor prior to the start of any new activity and thereafter on an as-needed basis. All new personnel arriving at the site will also receive an orientation, to be given by Maritime's Project Manager or designate.

	ENVIRONMENTAL PROTECTION PLAN	Version: 2.0
	Approved By: Perry Blanchard	Date: April 30, 2025


2.0 SITE ACTIVITIES

The types of activities that may be carried out include:

- Site Preparation: cutting and clearing of vegetation and removing organic materials and overburden on areas to be developed and developing construction stage water and erosion control (e.g., ditching, temporary / permanent sedimentation ponds) and access roads;
- Earthworks: facilitating construction of infrastructure development areas by excavating, preparing excavation bases, placing structural fill, and grading; stripping and stockpiling organic and overburden materials from open pit area; and use of open pit development rock for earthworks, such as structural fill and road gravels;
- Infrastructure Construction: placing concrete foundations and constructing footings and Project infrastructure;
- Equipment Installation: crushers, conveyors, weigh scales;
- Utilities Installation: power lines, water;
- Blasting: open pit development;
- Drilling: ongoing exploration;
- Crushing and Materials Handling: throughout operations, material is to be trucked from the pit to the crusher, crushed, stockpiled, and trucked offsite; and
- on site environmental sampling and monitoring.

Access to the sites will be via existing access roads and trails. If additional access trails are required during site work activities, a route will be selected to ensure minimal disturbance to the existing environment. Maritime will adhere to all requirements outlined in applicable permits, approvals and/or authorization during all site work activities.

The EPP will be revisited and reviewed with respect to ongoing site activities, as required.

	ENVIRONMENTAL PROTECTION PLAN	Version: 2.0
	Approved By: Perry Blanchard	Date: April 30, 2025

3.0 REGULATORY REQUIREMENTS


3.1 Potential Approvals, Authorizations and Permits

Regulatory approvals permits and authorizations may be required for certain site activities. Conditions or expiry dates should be considered as elements of this EPP, and all personnel should be familiar with and adhere to all relevant permits and approvals.

A general list of permits, approvals and/or authorizations that may be required for Maritime work activities are presented below in Table 3.1. Note that other permits, approvals and/or authorizations will be required as the project moves into development related activities.

Table 3.1 Potential permits, Approvals and/or Authorizations

Department/Agency	Permits, Approvals and/or Authorizations	Element
Federal		
Department of Fisheries and Oceans (DFO)	Authorization for works in fish bearing waters	Installation of bridges and/or culverts, water discharge
Natural Resource Canada	Authorization for explosive magazine license	Explosive magazine
Transport Canada	Permit to store, handle, and transport dangerous goods	Storage, handling, and transportation of fuel, explosive and chemicals
Provincial		
Fisheries Forestry and Agriculture	Cutting permit Permit to burn Operating permit	Site Preparation
Fisheries Forestry and Agriculture	Permit to Occupy Crown Lands	Land Disturbance on Crown Lands
Industry, Energy and Technology	Exploration Approval	Any Exploration Work
Department of Environment and Climate Change	Permit to Alter a Body of Water Fording Bridges Culverts Site Drainage	Activities for work near or within a waterbody
	Water Use License	Water utilization

	ENVIRONMENTAL PROTECTION PLAN	Version: 2.0
	Approved By: Perry Blanchard	Date: April 30, 2025

Department/Agency	Permits, Approvals and/or Authorizations	Element
Department of Environment and Climate Change	Certificate of Approval	Open pit mine operations and dewatering
Fisheries Forestry and Agriculture	Authorization to control nuisance animals	Pit operations
Digital Government and Service NL	Certificate of approval for storage and handling of gasoline and associated products	Storage, handling and transportation of fuel
	Temporary Fuel Cache	Fuel Storage
	Building Accessibility and Fire and Life Safety	On-site buildings

3.2 Environmental Compliance Monitoring

3.2.1 Site Inspections

Site inspections will be conducted by company personnel before, during, and after any site disturbances related to activities performed by Maritime, or contractors on behalf of Maritime. For site inspections conducted prior to any site work activity, site details including vegetation, general terrain and topography, and drainage patterns will be recorded. Photographs should be taken during each site inspection. The required frequency of site inspections performed during site activities will be determined by the Project Manager or designate and will depend on the duration and type of activity being performed.


Regular site inspections will aid in the implementation of the environmental protection measures that are specified in this EPP and that will be specified in the applicable contracts and other relevant permits, approvals and/or authorizations.

Any environmental issues or concerns should be reported to Maritime's Project Manager or designate.

3.2.2 Monitoring

Monitoring will also confirm that all operation activities comply with applicable regulatory requirements and that mitigation measures are being employed effectively. Maritime's Project Manager or designate will be responsible for on-site environmental compliance monitoring during all mine operation activities.

Compliance monitoring will be required for various site activities (e.g., monitoring of site drainage). Federal and Provincial government compliance standards that may apply to site activities include,

	ENVIRONMENTAL PROTECTION PLAN	Version: 2.0
	Approved By: Perry Blanchard	Date: April 30, 2025

but are not limited to, those listed in Table 3.2. Personnel will comply with all relevant permits, approvals, authorizations, and legislation while conducting Project work.



 MARITIME RESOURCES	ENVIRONMENTAL PROTECTION PLAN	Version: 2.0
	Approved By: Perry Blanchard	Date: April 30, 2025

Table 3.2 Environmental Compliance Standards


Legislation/ Guidelines	Activity Requiring Compliance	Responsible Agency	Comment
Federal			
<i>Fisheries Act, Deleterious Substances</i>	Run-off from site to receiving waters	Fisheries and Oceans Canada and Environment and Climate Change Canada	Any deposited substance or discharge must not be deleterious (i.e., must be acutely non-lethal). Liquid effluents that enter freshwater or marine waters must comply with the Act.
<i>Species at Risk Act</i>	Mortality of endangered species or other species under federal authority	Environment and Climate Change Canada	Measures must be taken to avoid or lessen adverse effects on species at risk and those effects are monitored. Mitigation measures must be consistent with recovery strategies and action plans for species.
<i>Migratory Birds Convention Act</i>	Mortality of migratory birds, and any species under federal authority	Environment and Climate Change Canada, Canadian Wildlife Service (CWS)	CWS should be notified about the mortality of any endangered migratory bird in the project area, including passerine (songbirds), seabird and waterfowl species. Harmful substances (e.g., oil, waste, etc.) that are harmful to migratory birds must not be deposited into waters that are frequented by them. Nests, eggs, nest shelters of migratory birds must not be disturbed or destroyed. Notice should also be given about the mortality of any endangered species (under federal regulation).
<i>Transportation of Dangerous Goods Act and Regulations</i>	Handling and transporting of dangerous goods	Transport Canada	If the materials are transported and handled fully in compliance with the regulations, a permit is not required. A Permit of Equivalent Level of Safety is required if a variance from the regulations is necessary.
<i>Canadian Environmental Protection Act (CEPA)</i>	Activities that have the potential to interact with the environment and human health	Environment and Climate Change Canada	CEPA provides a framework for setting environmental quality objectives, guidelines and codes of practice, pollution prevention plans, regulation of toxic substances, controlling pollution of other wastes and environmental emergency plans.
<i>Explosive Act and Regulations</i>	Storing, transporting, and using explosives	Natural Resource Canada	Natural Resource Canada sets the requirements, prohibitions and safety precautions that apply to those working with explosives.

 MARITIME RESOURCES	ENVIRONMENTAL PROTECTION PLAN	Version: 2.0
	Approved By: Perry Blanchard	Date: April 30, 2025

Legislation/ Guidelines	Activity Requiring Compliance	Responsible Agency	Comment
Provincial			
<i>Environmental Protection Act</i>	Construction and Operation	PPD-NLDECC	All waste material shall be considered, prior to disposal, for reuse, resale or recycling. All waste materials, associated with operation shall be disposed of at an approved waste disposal site.
	Construction and Operation	PPD-NLDECC	All activities associated with mine operations are subject to the Air Pollution Control Regulations. Materials as stipulated in the Regulations cannot be burned in the open.
	Site drainage	PPD-NLDECC	All waters discharged from sites must comply with the Environmental Control Water and Sewage Regulations.
	Storage, handling and disposal of gasoline and other fuels	Service NL	Petroleum storage and handling is subject to the Storage and Handling of Gasoline and Associated Products Regulations. Refer to Section 5.1 of the EPP for the Fuel and Hazardous Material Spills Contingency Plan.
	Disposal of used oil	Service NL	The storage and disposal of used oil is subject to the Used Oil Control Regulations.
	Handling and storage of hazardous materials	Service NL	Activities involving the use of designated hazardous materials are subject to Workplace Hazardous Materials Information System. WHMIS outlines procedures for handling hazardous materials and provides details on various hazardous materials.
<i>Dangerous Goods Transportation Act and Regulations</i>	Transporting dangerous goods to the site	Department of Transportation and Works	Transporting goods considered dangerous to public safety must comply with regulations.

	ENVIRONMENTAL PROTECTION PLAN	Version: 2.0
	Approved By: Perry Blanchard	Date: April 30, 2025

Legislation/ Guidelines	Activity Requiring Compliance	Responsible Agency	Comment
<i>Historic Resources Act</i>	General site workactivities.	Cultural Heritage, Provincial Archaeology Office (PAO), Department of Tourism, Culture, Industry and Innovation	All archaeology sites and artifacts are considered the property of the Crown and must not be disturbed. Any archaeological materials encountered must be reported to the PAO.
<i>Forestry Act</i>	Cutting, burning, operating	NLDFFA, Forestry Branch	Cutting, clearing of trees for trails, drill pads etc. must comply with the Act.
<i>Minerals Act</i>	Exploration	DIET, Mineral Lands Division	All exploration work must comply with the Minerals Act.
<i>Lands Act</i>	Permit to occupy Crown Lands	NLDFFA, Crown Lands Administration Division	Any land disturbance on Crown Lands must comply with the Act.
<i>Occupational Health and Safety Act & Regulations</i>	Construction and Operation	Service NL	All activities should comply with the <i>Occupational Health and Safety Act and Regulations</i>

	ENVIRONMENTAL PROTECTION PLAN	Version: 2.0
	Approved By: Perry Blanchard	Date: April 30, 2025

3.3 Rehabilitation of Work Sites

Once site work activities have been completed, Maritime will begin rehabilitation of sites no longer in use.

Where applicable, the general rehabilitation process will include the following:

- terrain, soil and vegetation disturbances will be limited to that which is absolutely necessary;
- where possible, overburden and excavated rock will be stockpiled separately and reserved for later rehabilitation work;
- surface disturbances will be stabilized on an ongoing basis to limit erosion and promote natural revegetation;
- natural revegetation of surface disturbances will be encouraged, and active revegetation will be pursued where this is deemed critical, and where terrain and soil conditions permit;
- Maritime will incorporate environmental measures in any tender documents, and require contractors to conduct their work in accordance with this EPP;
- dismantling and removal of all temporary surface infrastructure (site trailers, portable lavatories, fuel drums, etc.);
- handling of any hydrocarbon and/or hazardous materials according to provincial and/or federal handling requirements (TDG etc.);
- general ground surface contouring to establish permanent drainage patterns, minimize erosion, and aid in safety of the public;
- replacement, where appropriate, of stockpiled overburden, or other suitable materials to encourage natural revegetation; and
- revegetation where natural revegetation does not occur, or if site conditions such as erosion necessitates such action.


3.4 Reporting

3.4.1 Internal Communication

Environmental performance or concerns associated with any site work activity will be communicated internally as required. The Maritime Project Manager is responsible for communicating policies, procedures, legal, and other requirements to Project personnel. Project personnel will communicate all environmental incidents to Maritime's Project Manager as per the Reporting Procedures.

3.4.2 External Communication

When required, Maritime will, through the Project Manager, report on environmental issues relating to Project activities to the Newfoundland and Labrador Department of Environment and

	ENVIRONMENTAL PROTECTION PLAN	Version: 2.0
	Approved By: Perry Blanchard	Date: April 30, 2025


Climate Change (DECC). Environmental issues which may be communicated include, but are not necessarily limited to:

- Accidental releases (spills);
- excessive dust;
- erosion;
- location of historic resources;
- wildlife encounters, and
- permits and authorizations.

Any spills of petroleum products or other hazardous materials will be reported to the

Environmental Response 24 Hour Report Line (Coast Guard Traffic Centre, St. John's)
(St. John's: **709-772-2083** or Other Areas: **1-800-563-9089**).

Refer to Section 4.14 for the definition of reportable spills on-land versus in freshwater environments. Other compliance reporting required by permits, or through compliance requirements not listed above, will be submitted to DECC.

	ENVIRONMENTAL PROTECTION PLAN	Version: 2.0
	Approved By: Perry Blanchard	Date: April 30, 2025

4.0 ENVIRONMENTAL PROTECTION PROCEDURES

This Section provides a description of environmental protection procedures for the following anticipated site work related activities:


- Surveying
- Buffer Zones
- Laydown and Storage Areas
- Clearing Vegetation
- Grubbing
- Erosion Prevention
- Water Supply
- Watercourse (Stream) Crossings
- Exploration Drilling, Water Well Drilling, and Pump Tests
- Trenching
- Pumps and Generators
- Dewatering Work Areas and Site Drainage
- Equipment Use and Maintenance
- Storage, Handling and Transfer of Fuel and Other Hazardous Material
- Propane
- Waste Disposal
- Sewage Disposal
- Hazardous Waste Disposal
- Vehicle Traffic
- Dust Control
- Noise Control
- Drilling and Blasting

When required, this EPP will be revised to include new or amended environmental protection procedures so that site work activities are completed properly and that the significant environmental aspects of the site are managed appropriately.

4.1 Surveying

Potential Environmental Concerns

Surveying activities could potentially disturb wildlife species, vegetation, and historic resources.

	ENVIRONMENTAL PROTECTION PLAN	Version: 2.0
	Approved By: Perry Blanchard	Date: April 30, 2025


Environmental Protection Procedures

Vegetation Removal

- a) Width of survey lines will be limited to that which is necessary for line of sight and unobstructed passage.
- b) Whenever possible, cutting lines to the boundary between treed and open areas will be avoided.
- c) Trees and shrubs will be cut flush with the ground wherever possible.
- d) Cutting of survey lines will be kept to a minimum. Where possible, alternate areas not requiring cutlines will be used.
- e) All trees not exactly on transit lines shall be left standing.
- f) No attempt to harass or disturb wildlife will be made by any worker (refer to Section 5.3).
- g) Vehicles will yield the right-of-way to wildlife.
- h) There will be no cutting in areas designated as sensitive without notification and approval of the Project Manager.
- i) Any historic resource discoveries will be reported to the Provincial Archaeology Office (see Section 5.4).
- j) All sites where surface disturbances are planned or may occur will be inspected and monitored prior to, during, and after the work.

Travel, Access, and Surveying

- k) All-terrain vehicles (ATVs) will not be allowed off the right-of-way except as approved by the Project Manager or as dictated by permits. The use of ATVs will be restricted to designated trails, thus minimizing ground disturbance. ATV use will comply with the Motorized Snow Mobile and All-Terrain Vehicle Regulations, 1996 under the *Motorized Snow Mobile and All-Terrain Vehicle Act* and the Environmental Guidelines for Stream Crossings by ATV issued by the DECC.
- l) No attempt to harass or disturb wildlife will be made by any worker.

	ENVIRONMENTAL PROTECTION PLAN	Version: 2.0
	Approved By: Perry Blanchard	Date: April 30, 2025

- m) No motorized vehicles will enter the areas designated as sensitive without notification and approval of the Project Manager or as dictated by permits.

4.2 Buffer Zones

Potential Environmental Concerns

Buffer zones are boundaries of undisturbed vegetation maintained along water bodies. Without adequate buffer zone vegetation, streams, ponds and lakes can potentially become laden with silt from run-off. Vegetation of riparian zones also provides cover for fish in various aquatic environments.

Environmental Protection Procedures

A minimum buffer zone of 15 m or as dictated by permits of undisturbed natural vegetation is to be maintained between work areas and water bodies. Where possible, additional buffer widths will be maintained according to the guidelines shown in Recommended Minimum Buffer Zone Requirements for Activities near Watercourses in Table 4.1.

Table 4.1 Recommended Minimum buffers for Activities near Watercourses

Activity	Recommended Buffer Width
Development around watercourses in urban or other developed area	15 m depending upon site specific considerations
Resource roads or highways running adjacent to water bodies	20 m + 1.5 X slope (%)
Piling of wood and slash - Grubbing	30 m
Placement of Temporary Site Trailers - Fuel storage	100 m
Source: Gosse, M.M., A.S. Power, D.E. Hyslop, and S.L. Pierce. 1998. Guidelines for Protection of Freshwater Fish Habitat in Newfoundland and Labrador. Fisheries and Oceans.	


4.3 Laydown and Storage Areas

Potential Environmental Concerns

Laydown areas may be necessary for storing and maintaining equipment and supplies during site work activities. Potential erosion and run-off of sediment into nearby water bodies must be prevented.

Environmental Protection Procedures

- a) Existing laydown and storage areas will be used where feasible.

	ENVIRONMENTAL PROTECTION PLAN	Version: 2.0
	Approved By: Perry Blanchard	Date: April 30, 2025

- b) Any new laydown, maintenance or storage areas required will only be established within the Project boundaries.
- c) Establishing any new laydown or storage areas will follow the procedures for vegetation clearing/grubbing (Section 4.4 and 4.5) and erosion prevention (Section 4.6).
- d) External storage areas will be placed on level terrain and kept free of ponding or run-off.
- e) Drainage from areas of exposed soil will be controlled by grade or ditching and directing run-off away from water bodies.
- f) Laydown and storage areas no longer required for site work activities will be rehabilitated.
- g) Fuel will be stored, handled, and transported according to Section 4.14.

4.4 Clearing Vegetation

Potential Environmental Concerns


Vegetation clearing (e.g., trees, shrubs, etc.) may be required in advance of some site work activities.

Maritime commits to completing nest sweep surveys by qualified professionals prior to any clearing or grubbing completed at the Project site within breeding bird season (April 15 through August 15), in accordance with Migratory Bird Regulations (2022). Nest sweep surveys will be conducted no more than 5 days prior to any clearing or grubbing work completed within the designated nesting season dates.

Potential concerns include uncontrolled burning of slash, stockpiling vegetation in or near watercourses and wildlife disturbance.


Environmental Protection Procedures

- a) Clearing activities will comply with the requirements of all applicable permits, including the Permit to Burn.
- b) Clearing or removal of trees will be kept to a minimum.
- c) Clearing will consist of cutting to within 15 cm of the ground or as dictated by permits and disposing of all standing trees, as well as removing all shrubs, debris and other vegetation from the area. These materials will be stacked clear of on-going site work activities for

	ENVIRONMENTAL PROTECTION PLAN	Version: 2.0
	Approved By: Perry Blanchard	Date: April 30, 2025

future rehabilitation. The *Environmental Protection Guidelines for Ecologically Based Forest Resource Management* (1998) will be followed.

- d) If merchantable or usable timber is encountered, it will be removed by a local contractor.
- e) Disposing of cleared un-merchantable timber, slash and cuttings by burning will comply with the *Forest Fire Regulations* under the *Forestry Act*, Environmental Code of Practice for Open Burning and the Permit to Burn (from the Newfoundland and Labrador Department of Fisheries and Land Resources). At no time will a fire be left unattended.
- f) Slash and any other material or debris related to site work activities will not be permitted to enter any watercourse and will be piled above spring flood levels.
- g) Chain saws or other hand-held equipment will be used in clearing vegetation except where alternative methods or equipment is approved by Maritime and applicable permits, such as mechanical harvesters. The use of mechanical clearing methods, such as excavators, will not be permitted except where it can be demonstrated that there is no merchantable timber, and where the resulting terrain disturbance and erosion will not result in the loss of topsoil or the sedimentation of nearby waterbodies.
- h) A minimum 15 m buffer zone of undisturbed vegetation will be maintained between the development area and all other waterbodies (Section 4.2).
- i) Timber shall be felled inward toward the work area to avoid damaging any standing trees within the immediate work area.
- j) Workers will not destroy or disturb any features indicative of a cultural or archaeological site. Such features should be avoided until a report has been made to the Provincial Archaeology Office and clearance to proceed has been received.
- k) Where feasible, vegetation clearing will be scheduled to avoid disturbance during the critical bird nesting period.
- l) The disturbance of wetlands will be avoided outside the work area. If site work activities require crossing or disturbing wetlands, appropriate permits and approvals will be in place.
- m) All sites where surface disturbances are planned or may occur will be inspected and monitored prior to, during, and after the work as described in Section 3.2.

	ENVIRONMENTAL PROTECTION PLAN	Version: 2.0
	Approved By: Perry Blanchard	Date: April 30, 2025

4.5 Grubbing


Potential Environmental Concerns

The primary concerns associated with grubbing and disposal of related debris are the potential adverse effects on freshwater ecosystems and water quality through the release of sediment into watercourses, as well as the potential for disturbing historic resources.

Maritime commits to completing nest sweep surveys by qualified professionals prior to any clearing or grubbing completed at the Project site within breeding bird season (April 15 through August 15), in accordance with Migratory Bird Regulations (2022). Nest sweep surveys will be conducted no more than 5 days prior to any clearing or grubbing work completed within the designated nesting season dates.

Environmental Protection Procedures

- a) Grubbing of the organic vegetation mat and/or the upper soil horizons will be restricted to the minimum area required.
- b) Nests, eggs, nest shelters of migratory birds or other wildlife must not be disturbed or destroyed. As well, efforts will be taken to complete any clearing in these areas outside of the bird breeding season.
- c) Should additional clearing be required, and it is not possible to undertake clearing outside of the breeding season and a nest is found, the following mitigative actions will be taken:
 - the nest site and neighboring vegetation should be left undisturbed until nesting is completed; and
 - construction activities should be minimized in the immediate area until nesting is completed.
- d) If grubbing or disposal of debris is to occur within 15 m of a waterbody a permit will be obtained.
- e) Any surplus of such material will be stored or stockpiled for site rehabilitation and revegetation purposes. Topsoil and organics should be stored in low (1 to 2 metres high) stable piles (Gosse et al. 1998). The location of the stockpiles will be recorded and accessible for rehabilitation purposes.
- f) Measures will be implemented to reduce and control runoff of sediment-laden water during grubbing, and the re-spreading and stockpiling of grubbed materials. Where

	ENVIRONMENTAL PROTECTION PLAN	Version: 2.0
	Approved By: Perry Blanchard	Date: April 30, 2025

grubbed materials are re-spread or stockpiled, as many stumps and roots as possible will be left on the ground surface to maintain soil cohesion, dissipate the energy of runoff and promote natural revegetation. Erosion control measures will be implemented in areas prone to soil loss (Section 4.6).

- g) The length of time that inactive grubbed areas will be left exposed to the natural elements will be minimized to prevent unnecessary erosion. Mitigations such as the placement and maintenance of silt curtains will be used to prevent erosion from exposed areas.
- h) Grubbing activities will adhere to the buffer zone requirements outlined in Section 4.2.
- i) Water quality monitoring of run-off may be required by the PPD of DECC to ensure no adverse effects on the receiving environment.
- j) Discovery of historic resources will be handled according to the procedures outlined in Section 5.4.


4.6 Erosion

Potential Environmental Concerns

Eroded material could potentially cause siltation in water bodies, potentially impacting habitat for aquatic and terrestrial animals.

Environmental Protection Procedures

- a) All site work activities will be conducted according to the conditions set out in the permits, approvals and authorizations obtained from applicable regulatory agencies.
- b) The primary means for controlling erosion is to avoid activities that may contribute to erosion. The disturbance of new areas will be minimized.
- c) Drainage ditches will be stabilized if required (e.g., lining with vegetation or rock, terracing, interceptor swales, installation of rock check dams) to reduce soil erosion. Any such measures will be properly inspected and maintained following installation.
- d) All areas of exposed erodible soil will be stabilized by back-blading, grading and/or compacting, or installing other means of protection.
- e) If an inspection reveals that silt is entering any waterbody, further mitigative measures will be implemented, such as temporary drainage ditches, siltation control (settling) ponds,

	ENVIRONMENTAL PROTECTION PLAN	Version: 2.0
	Approved By: Perry Blanchard	Date: April 30, 2025

ditch blocks/check dams or sediment dam traps, to intercept run-off. The necessary or appropriate measures will be determined in the field.

- f) All work, laydown and storage areas will be monitored for erosion and appropriate repair action conducted as necessary.
- g) Existing or new siltation control structures used will be monitored for excessive accumulation of sediment. Accumulated sediment will be removed from control structures to gain full effectiveness of the systems. Effluent from control structures will be released to flow overland for appropriate filtration prior to entering any waterbody.

4.7 Water Withdrawal and Supply

Potential Environmental Concerns

Environmental concerns related to water withdrawal and supply includes potential detrimental effects to the habitat in and around the potentially affected waterbody.


Environmental Protection Procedures

- a) Adherence to all permit conditions issued by Water Resources Division of DECC.
- b) The water intakes must have an appropriate screen to prevent damage to fish. Guidelines for the screening of water intakes are provided by Department of Fisheries and Oceans (DFO).
- c) Also see Section 4.11 Pumps and Generators and 4.12 Dewatering Work Areas and Site Drainage.

4.8 Watercourse (Stream) Crossings

Potential Environmental Concerns

The potential environmental concerns associated with stream crossings and culvert installations include potential direct disturbances to and/or mortality of fish, and potential loss of fish habitat resulting from sedimentation and removal of habitat and stream bank vegetation. An evaluation of soil erosion potential will be conducted at each of the stream crossings. This assessment of potential erosion risk will assist in the development of specific erosion stabilization methods and effective sedimentation control practices on a site-specific basis.


	ENVIRONMENTAL PROTECTION PLAN	Version: 2.0
	Approved By: Perry Blanchard	Date: April 30, 2025

Environmental Protection Procedures


No work below the high-water mark of any surface water feature will be conducted without the prior notification of, and assessment by, the Project Manager. Stream crossings will be constructed in compliance with the required Permit for Culvert Installation from the Water Resources Management Division of DECC, and any other approvals required from DECC and DFO. If fording is required, a Fording Permit will be obtained from DECC, and the conditions of the permit will be strictly followed.

The following measures will be implemented to minimize potential impacts of stream crossings:

- a) Between September 15 and June 15 (sensitive fish life stages) or other times specific to the region, stream crossing during site work activities will be undertaken under the direct supervision of the Project Manager.
- b) Avoid the entry of deleterious substances including, but not limited to, materials such as sediment and fuel to watercourses and waterbodies during watercourse crossing work.
- c) In locations of fish habitat, where culverts are required, application will be made to DECC and DFO. The culverts will be constructed according to all permit specifications and in accordance with the Environmental Guidelines for Culverts from the DECC. The following measures will also be implemented:
 - i) install culvert(s) in accordance with good engineering and environmental practices;
 - ii) unless otherwise indicated, all work should take place in dry conditions, either using cofferdams or by diverting the stream;
 - iii) installation of cylindrical culverts shall be counter sunk only where necessary to protect fish habitat such that the culvert bottom is one-third the diameter below the streambed in the case of culverts less than 750 mm outside the diameter; for culverts greater than 750 mm outside diameter, the culvert bottom shall be installed a minimum of 300 mm below the streambed;
 - iv) in multiple (gang) culvert installations, install one culvert at an elevation lower than the others;
 - v) the natural low flow regime of the watercourse will not be altered;

	ENVIRONMENTAL PROTECTION PLAN	Version: 2.0
	Approved By: Perry Blanchard	Date: April 30, 2025

- vi) a culvert will not be installed before site specific information such as localized stream gradient, fish habitat type and species present have been evaluated. Culverts are to be installed using the guidelines provided in Gosse et al. (1998);
- vii) riprap outlets and inlets to prevent erosion of fill slopes;
- viii) use culverts of sufficient length to extend a short distance beyond the toe of the fill material;
- ix) use backfilling material that is of a texture that shall support the culvert and limit seepage and subsequent washing out;
- x) align culverts such that the original direction of stream flow is not significantly altered;
- xi) remove fill and any related debris from the culvert area to a location above the peak flow level to prevent its entry into the stream;
- xii) fill material shall not be removed from streambeds or banks; except when installing a culvert when removal of material is necessary for the foundation;
- xiii) culverts should be marked to indicate their position under the snow.
- xiv) minimize and restrict the use of heavy equipment in and near watercourses; where possible, an excavator will be used from shore rather than a bulldozer in the watercourse. Where it is absolutely necessary to do so, instream work will be performed by rubber-tired vehicles (Gosse et al. 1998) only and will only be done with prior notification of Maritime's Project Manager, in compliance with applicable regulatory agencies;
- xv) as required, cofferdams of non-erodible material shall be used to separate work areas from the watercourse when excavating for culverts and footings; and
- xvi) cofferdams shall be removed upon completion of the work and the streambed returned as closely as possible to its original condition.
- d) When fording any watercourse, the DECC Environmental Guidelines and any applicable permits will be adhered along with the following:
 - i) areas of spawning habitat will be avoided;
 - ii) crossings shall be restricted to a single location and crossings made at right angles to the watercourse;

	ENVIRONMENTAL PROTECTION PLAN	Version: 2.0
	Approved By: Perry Blanchard	Date: April 30, 2025

- iii) equipment activity within the watercourse shall be minimized by limiting the number of crossings;
- iv) all equipment will be mechanically sound to avoid leaks of oil, gasoline and hydraulic fluids;
- v) no servicing or washing of heavy equipment will occur adjacent to watercourses; temporary fuelling, servicing or washing of equipment in areas other than the main fuel storage site will not be allowed within 30 m of a watercourse;
- vi) stabilize the entire fording area using vegetation mats, corduroy roads or coarse material (125 mm diameter or greater) when the ford area is not natural bedrock or is easily disturbed by fording. When the substrate of the ford area is not subject to easy disturbance by fording, or coarse material is not easily available within the lease boundaries, fording under existing substrate conditions may occur under the direction of the Project Manager;
- vii) fording activities will not decrease the depth of the watercourses to less than 20 cm. Where the existing depth is less than 20 cm, that depth shall be maintained;
- viii) fording activities will be halted during seasonal or precipitation related high flow periods; and
- ix) stabilize all bank sections which contain loose or erodible materials; if banks must be sloped for stabilization, no material shall be deposited within the watercourse; sloping shall be accomplished by back-blading and the material removed shall be deposited above the high-water mark of the watercourse.


4.9 Exploration Drilling on Land, Water Well Drilling and Pump Tests

Potential Environmental Concerns

The potential environmental concerns with exploration drilling, water well drilling and pump tests are potential surface disturbances, disposal of drilling fluids and cuttings, potential siltation, generation of dust, noise and the potential impacts on terrestrial habitats, air quality, aquatic ecosystems and historic resources.

Environmental Protection Procedures

- a) Potential drilling sites in sensitive areas should be inspected prior to any drill site preparation by the Site Manager.


	ENVIRONMENTAL PROTECTION PLAN	Version: 2.0
	Approved By: Perry Blanchard	Date: April 30, 2025

- b) Vegetation will be cleared following the procedures detailed in Section 4.4.
- c) Waste oil will be removed from the drill site and properly disposed of.
- d) Water applications will be used to control dust where necessary. The use of water for dust control or lubrication during drilling will be undertaken in such a manner that runoff will not enter watercourses.
- e) Water used will remain on the drill site. A Water Use Licence will be issued as part of the Approval for exploration activities. Every effort will be made to prevent turbid water from entering any watercourse.
- f) Cuttings from drill activities will not be removed from the site; they will remain in the immediate location of drilling activities, while taking all required buffer zones into consideration.
- g) Drilling equipment will have muffled exhaust to minimize generated noise.
- h) Fuel will be stored, handled and transported according to Section 4.14.
- i) Garbage and solid waste will be removed from the drill site and deposited in an approved waste disposal area.
- j) Due to the nature of drilling activities (i.e., quicksnaps and couplings) oil drops and leaks may occur and every attempt possible will be made to clean up the area. All rigs will be equipped with oil absorbent material in case of a leak or spill and spill kits will be kept available in case of a hydrocarbon spill.
- k) Drilling of water wells must be conducted in compliance with the *Water Resources Act* and *Well Drilling Regulations*.
- l) Completed exploration drill holes will retain casing and remain open for future probing. If a completed drill hole is producing water, it will be temporarily capped or indefinitely sealed with appropriate material to allow for any necessary future downhole testing. When all test work on the holes has been completed, then the casing will be removed.

4.10 Trenching

Potential Environmental Concerns

Where excavation for a trenching program is undertaken, potential runoff of sediment-laden water could result in effects on freshwater fish habitat and water quality.

	ENVIRONMENTAL PROTECTION PLAN	Version: 2.0
	Approved By: Perry Blanchard	Date: April 30, 2025

Environmental Protection Procedures

The following measures will be employed to minimize the potential impacts of trenching.

- a) The topsoil and excavated overburden and bedrock are stored in separate stockpiles for later use during rehabilitation.
- b) Any material unsuitable for future rehabilitation is disposed of in a disposal area approved by the Project Manager or designate.
- c) Dewatering of trenches will make use of measures to minimize and control the release of sediment laden water using various filtration measures, including but not limited to erosion control devices, settling ponds, straw bales, geotextile or other devices. Water quality monitoring of run-off or discharges may be required by the PPD of DECC to ensure no adverse effects on the receiving environment.


4.11 Pumps, Compressors, and Generators

Potential Environmental Concerns

A variety of water pumps, hoses, compressors and generators may be in use in many areas of the site and the support and supply for site trailers. Environmental concerns associated with any potential accidental spills or chronic leaks include contaminating waterbodies.

Environmental Protection Procedure

- a) To reduce fire hazards, fuel will not be stored immediately adjacent to generators, and the fuel storage area should be well ventilated. Fuel must not be stored within 100 m of waterbodies (Gosse et al. 1998).
- b) All fuel storage containers are to have spill trays beneath with a potential capacity of 110% of volume. They should also be in a covered and secured area.
- c) Drip pans are placed underneath pumps and generators located near waterbodies.
- d) Hoses and connections on equipment located near waterbodies should be inspected routinely for leaks and drips.
- e) All leaks will be reported immediately to the Project Manager.

	ENVIRONMENTAL PROTECTION PLAN	Version: 2.0
	Approved By: Perry Blanchard	Date: April 30, 2025

- f) In addition to spill kits located at fuel storage tanks additional spill kits are located at designated central storage location(s). Personnel who deal with fuelling, fuel transfer and pumps and generators are trained in the use of the kits.

4.12 Dewatering Work Areas and Site Drainage

Potential Environmental Concerns

The major concern associated with dewatering and site drainage is potential siltation and direct fish mortality and/or habitat destruction for freshwater species.


Environmental Protection Procedures

- a) Site water will be discharged to vegetated areas to reduce any potential effects on watercourses.
- b) Discharged water will follow natural surface drainage patterns.
- c) Water from dewatering the underground mine working will be pumped to a series of settling ponds that can provide adequate retention time to allow any suspended solids to be removed prior to final discharge to the environment. Water from the settling ponds will be discharged to a rockfill ditch that will create an evenly distributed flow to the natural vegetation.
- d) Monitoring of site run-off will be conducted as per provincial requirements following effluent quality standards.
- e) If silt is entering any waterbody, filtration or other suitable measures, such as silt fences, settling ponds and dykes will be used to remove silt from, and reduce the turbidity of, water pumped from work areas before discharging.
- f) If monitoring indicates regulated water quality standards are exceeded, Maritime will develop additional protocols in consultation with applicable regulatory agencies.

4.13 Equipment Use and Maintenance

Potential Environmental Concerns

A variety of vehicles and heavy equipment may be used during site work activities. Potential environmental concerns associated with operating and using such equipment include potential air emissions, accidental spills and hydrocarbon leaks that may contaminate on-site water bodies.

	ENVIRONMENTAL PROTECTION PLAN	Version: 2.0
	Approved By: Perry Blanchard	Date: April 30, 2025

Environmental Protection Procedure

- a) Equipment maintenance and fueling activities will be performed at sites designated by the Project Manager and in compliance with applicable regulations.
- b) Drip pans will be placed underneath pumps, fuel storage, and generators.
- c) Hoses and connections on equipment will be inspected routinely for leaks and drips.
- d) Only minor repairs and maintenance (e.g., lubrication) of 'non-mobile' equipment will be performed on-site. All major repairs are to be performed at a location outside of the project area, where possible.
- e) All fuel or oil leaks will be repaired and reported immediately to Maritime's Project Manager.
- f) All fuel and other hazardous materials will be handled according to the procedures in Section 4.14.
- g) In addition to spill kits located at fuel storage tanks additional spill kits will be located at designated central storage location(s). Personnel who deal with fueling, fuel transfer and pumps and generators will be trained in the use of the kits.


4.14 Storage, Handling, and Transferring of Fuel and Other Hazardous Material

Typical hazardous substances that may be used on site include, but are not limited to:

- petroleum, oil and lubricants;
- chlorinated and non-chlorinated solvents (e.g., cleaner-degreasers);
- flammable gases (e.g., acetylene);
- waste petroleum products (e.g., used engine oil);
- corrosives (e.g., battery acid); and
- glycol (e.g., antifreeze).

Potential Environmental Concerns

The primary concern with using hazardous substances is a potential uncontrolled release to the environment through spillage, and subsequent adverse effects on terrestrial and aquatic habitat and species, soil, groundwater quality, and human health and safety.


	ENVIRONMENTAL PROTECTION PLAN	Version: 2.0
	Approved By: Perry Blanchard	Date: April 30, 2025

Environmental Protection Procedures


- a) The Workplace Hazardous Materials Information System (WHMIS) Regulations under the Occupational Health and Safety Act will apply to all handling and storage of hazardous materials. All relevant current Material Safety Data Sheets (MSDS) will be readily available for the site.
- a) All necessary precautions will be taken to prevent and reduce the spillage, misplacement or loss of fuels and other hazardous materials. In the event of a reportable spill on-land or a spill, regardless of size, in the freshwater environment, the Environmental Emergencies 24-Hour Report Line will be contacted as noted in the contact list in Section 7.0.

A spill is defined as reportable, depending on the class and quantity of dangerous goods involved, which varies between applicable Regulations:

- Reportable spill quantities for hazardous materials are listed in the Transportation of Dangerous Goods Act.
 - A reportable hydrocarbon spill is defined as loss of gasoline or associated products in excess of 70 L in the Storage and Handling of Gasoline and Associated Products Regulations.
 - A spill, regardless of size, that may enter the freshwater environment, must be reported according to the Fisheries Act.
- b) A copy of the Contingency Plan (located in Section 5.0) for fuel and hazardous material spills will be readily available.
 - c) All fuel storage systems will be registered and comply with the Storage and Handling of Gasoline and Associated Products Regulations.
 - d) Only workers who are qualified and trained in handling these materials as stated in the manufacturer's instructions and government laws and regulations will handle fuel and other hazardous materials.
 - e) Operators will stay present during the entire refueling operation. At no time should it be left unattended.
 - f) Fuel and other hazardous materials should be stored at least 100 m from any surface water (Gosse et al. 1998).

	ENVIRONMENTAL PROTECTION PLAN	Version: 2.0
	Approved By: Perry Blanchard	Date: April 30, 2025

- g) Handling and fueling procedures will comply with the Storage and Handling of Gasoline and Associated Products and any additional requirements put forth by applicable regulators to limit potential contamination.
- h) Fuel storage areas and non-portable transfer lines will be clearly marked or barricaded so that they are not damaged by moving vehicles. The markers will be visible under all weather conditions. Barriers will be constructed in compliance with the Storage and Handling of Gasoline and Associated Product Regulations.
- i) Waste oils, lubricants, and other used oil will be retained in a tank or closed container and disposed of in accordance with the Used Oil Control Regulations. Spill trays will be used, and substances will be stored in a secured area.
- j) Fire and spill response materials will be kept nearby.
- k) Any soil contaminated by small leaks of oil or grease from equipment will be disposed of according to the Environmental Protection Act.
- l) All storage tank systems will be inspected on a regular basis by the operator as per the Storage and Handling of Gasoline and Associated Products Regulations. This involves, but is not limited to, gauging or dipping, reconciliation of records and the proper maintenance of reconciliation records for the applicable timeframe noted within permits and regulations.
- m) Contracted fuel suppliers will, before transporting or positioning fuel or oil, provide Maritime with a copy of their fuel and hazardous material spills contingency plan.
- n) Transportation of hazardous and dangerous materials shall be conducted in accordance with applicable regulations. Transportation documents shall be retained in a retrievable filing system and stored for the duration of the undertaking.
- o) Smoking will be prohibited within 10 m of a fuel storage area.
- p) Fueling or servicing of mobile equipment will be conducted in designated areas and should not occur within 100 m of any body of water (Gosse et al. 1998).
- q) Drum storage areas will not be located within 100 m of a water body (Gosse et al. 1998). Drums containing hydrocarbon or other hazardous materials will be transported, stored, handled and disposed of such that spillage or leakage does not occur. Maritime must approve the location of drum storage areas.

	ENVIRONMENTAL PROTECTION PLAN	Version: 2.0
	Approved By: Perry Blanchard	Date: April 30, 2025

- r) Small quantities of hazardous material (drums, cans and other containers under 20 L volume) will be stored in a secure location protected from weather and freezing, as well as vehicle traffic.
- s) Where hazardous materials are to be stored outdoors, a designated area will be established, graded and fitted with an impermeable membrane covered with local soil and surrounded by an earth berm.
- t) Decommissioning of any temporary storage tank system will be conducted according to the Environmental Code of Practice for Aboveground Storage Tank Systems Containing Petroleum Products.
- u) Hazardous waste will be moved to an appropriate hazardous waste storage area (refer to Section 4.18 for disposal). These areas are constructed in compliance with all applicable legislation.

4.15 Propane

Potential Environmental Concerns

There are potential risks associated with propane storage and use. Propane is a flammable substance and poses potential threat to human and animals. In the liquid form, propane could potentially cause frostbite on skin contact. Propane containers could potentially explode if exposed to heat or fire.


Environmental Protection Procedures

- a) Propane storage tanks will be installed and used as per manufacturer's specifications.
- b) Tank maintenance schedules will be set and followed.
- c) Tanks will be free of corrosion and damages.
- d) Areas surrounding propane storage tanks will be well ventilated and free of any possible ignition sources, and combustible materials.

4.16 Waste Disposal

Potential Environmental Concerns

Waste (e.g., domestic and industrial wastes, grey water, paper, cardboard and wood), if not properly controlled and disposed of, will be unsightly and could potentially cause human safety

	ENVIRONMENTAL PROTECTION PLAN	Version: 2.0
	Approved By: Perry Blanchard	Date: April 30, 2025

and health concerns. It could also attract wildlife leading to the potential for human-wildlife conflicts.

Environmental Protection Procedures

- a) All solid waste will be handled according to provisions under the provincial *Environmental Protection Act*.
- b) All solid waste materials shall be considered, prior to disposal, for reuse, resale, or recycling.
- c) Solid waste produced by site personnel and operations will be collected and disposed of at an approved facility, with permission obtained from that facility.
- d) Waste accumulated on site prior to disposal will be confined, so that it does not pose an environmental or health hazard.
- e) Work areas will be kept clear of waste and litter to reduce the potential for attracting wildlife and reducing potential interactions with wildlife (see procedures in Section 5.3 for handling wildlife encounters).
- f) Any waste that may attract animals (i.e., food) will be stored in covered, wildlife-proof containers.
- g) Burning of waste is not permitted without appropriate permits.
- h) All hazardous wastes generated will be handled according to the procedures for handling fuel and hazardous materials (Section 4.14).


4.17 Sewage Disposal

Potential Environmental Concerns

The release of untreated sewage is a potential concern to human health, drinking water quality, and freshwater and marine ecosystems.

Environmental Protection Procedures

- a) The sewage from portable toilets will be delivered to a licensed contractor and disposed of in compliance with the Newfoundland and Labrador Department of Health guidelines, the *Lands Act*, *Waste Management Regulations*, 2003 under the *Environmental Protection*

	ENVIRONMENTAL PROTECTION PLAN	Version: 2.0
	Approved By: Perry Blanchard	Date: April 30, 2025

Act and the Environmental Control Water and Sewage Regulations, 2003 under the Environmental Protection Act.

- b) Portable toilets or pit privies will be located a distance of at least 25 m from any work site in a direction away from bodies of water. Pit privies will be backfilled upon abandonment.


4.18 Hazardous Waste Disposal

Potential Environmental Concerns

The primary concern with disposing of hazardous substances is the potential for an uncontrolled release to the environment through leakage or accidental spillage, and subsequent adverse effects on terrestrial and aquatic habitat and species, soil, groundwater quality, and human health and safety.

Environmental Protection Procedures

- a) All hazardous waste will be handled according to provisions under the provincial *Environmental Protection Act*. Waste classified as “hazardous” or “special” that cannot be disposed of in regular landfill sites will be sent for disposal to a licensed hazardous waste management company.
- b) All necessary precautions will be taken to prevent and reduce the spillage, misplacement or loss of fuels and other hazardous materials. In the event of a spill on-land or in the freshwater environment, refer to the Contingency Plan (Section 5.1).
- c) A copy of Maritime’s Contingency Plan (under separate cover) will be present at hazardous material storage sites and fuel transfer locations.
- d) Hazardous waste materials will only be handled by workers who are qualified and trained in handling these materials as stipulated in government laws and regulations.
- e) Waste accumulated on site prior to disposal will be confined, so that it does not pose an environmental or health hazard.
- f) Waste material will not be disposed of on-site or in a body of water.
- g) Burning of hazardous waste is not permitted.
- h) Where hazardous waste materials are to be stored outdoors, a designated area will be established, graded and fitted with an impermeable membrane covered with local soil and surrounded by an earth berm.

	ENVIRONMENTAL PROTECTION PLAN	Version: 2.0
	Approved By: Perry Blanchard	Date: April 30, 2025

- i) Waste oils, lubricants, and other used oil will be retained in a tank or closed container and disposed of in accordance with the *Used Oil Control Regulations*.
- j) Any soil contaminated by small leaks of oil or grease from equipment will be disposed of according to provisions under the *Environmental Protection Act*.
- k) All hazardous wastes generated by alternative treatments will be handled according to the procedures for handling fuel and hazardous materials (Section 4.14).


4.19 Vehicle Traffic

Potential Environmental Concerns

Vehicular traffic can potentially result in fugitive dust, emissions, and noise. Maritime is committed to the proper operation and maintenance of its vehicles to reduce adverse environmental impacts.

Environmental Protection Procedures

- a) All vehicle and equipment use, including the use of ATVs, will be restricted to designated routes within and between work, laydown, maintenance and storage areas.
- b) All vehicles and equipment will be properly maintained to meet standards for noise and emissions.
- c) Travel in areas outside designated work areas will not be permitted.
- d) All vehicles and equipment will yield to wildlife (see procedures in Section 5.3 for handling wildlife encounters).
- e) All vehicles and equipment will yield to people, if present, and reduced speeds will be maintained on all roadways.
- f) Chasing and/or harassing wildlife with vehicles and equipment will not be permitted.
- g) Maintaining and refuelling vehicles will be restricted to designated areas (See Section 4.14).
- h) Heavy equipment (e.g., dump trucks and front-end loaders) will only be used in work areas.
- i) Access roads will be monitored for signs of erosion and appropriate action will be taken to repair roads, when necessary.

	ENVIRONMENTAL PROTECTION PLAN	Version: 2.0
	Approved By: Perry Blanchard	Date: April 30, 2025

- j) As required, dust suppression measures will be implemented, and including the application of water or environmentally acceptable chemical dust suppressants.

4.20 Dust Control

Potential Environmental Concerns

The environmental concerns associated with dust include potential human health effects and potential effects on aquatic ecosystems and vegetation.

Environmental Protection Procedures

- a) Dust from site work activities will be controlled using water. In the event of excessive dust, water will be applied to travel and work surfaces.
- b) Waste oil will not be used for dust control, but other agents such as calcium chloride may be used with the approval of the appropriate regulatory agencies.

4.21 Noise Control

Potential Environmental Concerns

A variety of noises associated with site activities can potentially cause negative effects on wildlife resources in terms of their distribution and abundance.

Environmental Protection Procedures


- a) Measures will be implemented wherever possible to minimize potential impacts arising from a variety of noise sources.
- b) Adherence to all permits, approvals and/or authorizations.
- c) All vehicles and generators will have exhaust systems regularly inspected, and mufflers will be operating properly and maintained according to manufacturers specifications.

4.22 Drilling and Blasting

Maritime's contractor will be responsible for the transportation, storage, and use of explosives.

Environmental Concerns

Potential environmental concerns associated with on-land drilling and blasting include destruction of vegetation zone, noise disturbances to wildlife, effects to fish and aquatic animals, disturbance


	ENVIRONMENTAL PROTECTION PLAN	Version: 2.0
	Approved By: Perry Blanchard	Date: April 30, 2025

of historic resources, dust generation, and the potential introduction of silt and ammonia into water bodies.


Environmental Protection Procedures

General drilling and blasting Environmental Protection Procedures:

- a) The contractor will conduct all blasting work in compliance with the appropriate permits and/or approvals and authorizations. All blasters will have a Blasters Safety Certificate, and all blasting will be conducted in adherence to safe work procedures and applicable legislation.
- b) The contractor will obtain the appropriate approvals for all explosive magazines.
- c) The contractor will handle, transport, store and use explosives and all other hazardous materials in compliance with all applicable laws and regulations of Occupational Health and Safety Act and the Dangerous Goods Transportation Act.
- d) The contractor will use blasting patterns and procedures which minimize shock or instantaneous peak noise levels.
- e) The contractor will not blast in the vicinity of fuel storage facilities.
- f) Where necessary, runoff from blasted areas will be monitored and sampled at discharge sites.
- g) The contractor will coordinate and schedule blasting activities to minimize the number of blasts required. To minimize the seismic effect, blasting patterns and procedures will be used to reduce the shock wave and noise.
- h) The contractor will use explosives in a manner that will minimize damage or defacement of landscape features, trees and other surrounding objects by controlling through the best methods possible (including time-delay blast cycles) the scatter of blasted material beyond the limits of activity.
- i) If birds or wildlife are detected in the area, described blasting will only proceed when wildlife has left the area, or when consultation with Wildlife Division has occurred.
- j) Drilling equipment used shall be maintained as per manufacturers recommendations to minimize emissions and noise.

	ENVIRONMENTAL PROTECTION PLAN	Version: 2.0
	Approved By: Perry Blanchard	Date: April 30, 2025

- k) Water used in drilling operations shall report to a collection sump for treatment prior to discharge.

	ENVIRONMENTAL PROTECTION PLAN	Version: 2.0
	Approved By: Perry Blanchard	Date: April 30, 2025

5.0 CONTINGENCY PLANS

Contingency plans to address accidents and unplanned situations have been developed and will be modified as required throughout ongoing site work activities.

The following contingency plans have been developed:

- Fuel and Hazardous Material Spills;
- Wildlife Encounters;
- Forest Fires;
- Discovery of Historic Resources, and
- Natural Disasters.

Notwithstanding these contingency plans, a policy to implement preventative measures as the first line of defence against the possibility of accidents will be adopted.

5.1 Petroleum and Hazardous Material Spills


Potential Environmental Concerns

Fuel and hazardous materials can potentially be damaging to vegetation, soil, surface water, ground water, wildlife, aquatic organisms, historic resources and human health and safety.

Environmental Protection and Response Procedures

In case of a fuel or hazardous material spill, the following procedures will apply.

- a) The individual who discovers the leak or spill will make a reasonable attempt to immediately stop the leakage and contain the flow, if safe to do so. Spill kits are located at fuel storage tanks and at designated central storage location(s).
- b) Spill location, type of fuel or hazardous material, volume and terrain condition at the spill site will be determined and reported immediately to the Project Manager, who will report it immediately to the applicable regulatory agency.
- c) In the event of a reportable spill on-land, or any spill regardless of size that may enter a waterbody frequented by fish, must be reported immediately to the **Environmental Emergencies 24 Hour Report Line 709-772-2083 or 800-563-9089**. (Refer to Section 4.14 for the definition of reportable spills on-land versus in freshwater environments.) The spill occurrence shall be documented on the Spill Report Form in Appendix C.


	ENVIRONMENTAL PROTECTION PLAN	Version: 2.0
	Approved By: Perry Blanchard	Date: April 30, 2025

Required information may include but is not limited to:


- i) name of reporter and phone number;
 - ii) time of spill or leak;
 - iii) time of detection of spill or leak;
 - iv) type of product spilled or leaked;
 - v) amount of product spilled or leaked;
 - vi) location of spill or leak;
 - vii) source of spill or leak;
 - viii) type of accident - collision, rupture, overflow, other;
 - ix) owner of product and phone number;
 - x) if the spill or leak is still occurring;
 - xi) if the spill or leaked product is contained, and if not, where it is flowing;
 - xii) wind velocity and direction;
 - xiii) temperature;
 - xiv) proximity to waterbodies, water intakes, and facilities, and
 - xv) snow cover and depth, terrain, and soil conditions.
- d) The Project Manager will act as the "On-Scene-Commander" for the purposes of cleaning up a fuel or hazardous materials spill. The Project Manager will be familiar with spill clean-up procedures and mobilization procedures of the clean-up equipment and will have full authority to take necessary and appropriate action without unnecessary delay.

Personnel will be trained on the procedures to follow in case of fuel and hazardous material spills as well as information related to necessary line of communication required. Maritime will develop a personnel responsibilities list before the start of site work activities.

A complete list of spill response equipment will be generated and distributed on-site before the start of any site work activities.

	ENVIRONMENTAL PROTECTION PLAN	Version: 2.0
	Approved By: Perry Blanchard	Date: April 30, 2025

- e) In reaching decisions on containment and clean-up procedures, the following criteria will be applied:
 - i) minimize danger to workers and public;
 - ii) protect water supplies;
 - iii) minimize pollution to watercourses;
 - iv) minimize area affected by spill, and
 - v) minimize the degree of disturbance to the area and watercourses during clean-up.
- f) The Project Manager or VP Environment and Sustainability will act in consultation with the regulating authorities to:
 - i) assess site conditions and environmental impacts of various cleanup procedures;
 - ii) assess potential for fuel recovery versus burning;
 - iii) deploy on-site staff to mobilize pumps and empty 215 L drums or other appropriate storage containers to the spill site;
 - iv) deploy on-site staff to build containment dykes and commence pumping contaminant into drums;
 - v) apply absorbent material as necessary;
 - vi) dispose of all contaminated debris, cleaning materials and absorbent material by burning, if appropriate, or by placing it in an approved land-fill site, and
 - vii) take all necessary precautions to avoid the incident in the future.
- g) The Project Manager will be responsible for the preparation of a written report which will be sent as soon as possible, but no later than 30 days after the spill, to Maritime's VP Environment and Sustainability and from there, to the applicable regulatory agencies.

	ENVIRONMENTAL PROTECTION PLAN	Version: 2.0
	Approved By: Perry Blanchard	Date: April 30, 2025

5.2 Fire and Explosion


Potential Environmental Concerns

Activities related to site work could potentially result in a fire, which could spread to the surrounding area. Such events could potentially be damaging to vegetation and wildlife, air and water quality, human health and safety, and Maritime assets.

Environmental Protection and Response Procedures

Maritime and their contractors will take all precautions necessary to prevent fire hazards when working at the site. These include but are not limited to:

- a) Disposal of all flammable waste on a regular basis.
- b) Maritime or their contractor will provide sufficient firefighting equipment to suit its labour force and fire hazards. Such equipment will be in good working order, comply with, and be maintained to the manufacturer's standards.
- c) Maritime or their contractor will ensure all personnel are trained in the use of such equipment.
- d) In the event of a forest fire, Maritime or the contractor will take immediate steps to contain or extinguish the fire, if safe to do so.
- e) Maritime's Project Manager will appoint a supervisory staff member as "On-Scene-Commander" for fighting any forest fires, if safe to do so.
- f) Fires should be reported immediately to:
 - i) the Project Manager and VP Environment and Sustainability; and
 - ii) Forestry Division, 24 hr Forest Fire Emergency Line at (866) 709-3473.
 - iii) Town of King's Point – (709) 268-3838
- g) The following information will be provided:
 - i) name of the reporter and phone number;
 - ii) time of detection of the fire;
 - iii) size of the fire; and

	ENVIRONMENTAL PROTECTION PLAN	Version: 2.0
	Approved By: Perry Blanchard	Date: April 30, 2025

iv) location of the fire.

5.3 Wildlife Encounters

Potential Environmental Concerns

Wildlife encounters pose a potential risk for stress or injury to both the wildlife and site personnel.


Control measures and environmental protection procedures have been put in place to reduce this potential risk to wildlife and humans.

As a protection measure, hunting, trapping or fishing is not permitted on any work site.

Environmental Protection and Response Procedures

All personnel and contractors are responsible to see that the following procedures and rules are implemented and adhered to:

- a) Site and working areas will be kept clean of food scraps and garbage.
- b) Waste will be collected for disposal in appropriate containers and routinely transferred to the approved location or facility.
- c) No attempt will be made by any worker at the project site to chase, catch, divert, follow or otherwise harass wildlife by vehicle or on foot.
- d) Equipment and vehicles will yield the right-of-way to wildlife.
- e) All personnel should be aware of the potential for encounters with bears, coyotes, caribou, moose, etc. Any wildlife sightings will be recorded. Personnel are to report any bear sightings to the Project Manager. The Project Manager will notify the VP Environment and Sustainability to report any bear sightings and to assess actions for follow-up.
- f) The Project Manager will be responsible for all actions in response to nuisance animals (e.g., bears) in the work area and will advise the VP Environment and Sustainability if required, for further action.
- g) Under provincial wildlife regulations, the displacement and release of any animal is the sole jurisdiction of the NL Wildlife division and is to be undertaken only under appropriate supervision.

	ENVIRONMENTAL PROTECTION PLAN	Version: 2.0
	Approved By: Perry Blanchard	Date: April 30, 2025

- h) If the nest of any raptor, or other birds are encountered, work in the area is to be halted until the Project Manager and/or VP Environment and Sustainability is contacted and has had the opportunity to contact the Wildlife Division and appropriate mitigation is applied.


5.4 Discovery of Historic Resources

Potential Environmental Concerns

Historic resource material that is disturbed, destroyed, or improperly removed from a site represents a potential cultural loss of information and history that could otherwise be handled and interpreted in an efficient and appropriate manner.

Environmental Protection and Response Procedures

- a) If suspected archaeological material is encountered, stop all work in the immediate area of the discovery until authorized personnel from Maritime, having consulted with the Provincial Archaeology Office, permit resumption of the work.
- b) Mark the site's visible boundaries. Personnel will not move or remove any artifacts or associated material unless the integrity of the material is threatened.
- c) The Project Manager will report the find with the following information to the Provincial Archaeology Office, Department of Tourism, Industry and Innovation in St. John's, and comply with the instruction provided:
 - i) nature of the find;
 - ii) precise descriptive and map location and the time of the find;
 - iii) nature of the activity resulting in the find;
 - iv) identity of the worker(s) making the find;
 - v) present location of the material, if moved, and any protective measures initiated for the material and the site, and
 - vi) extenuating circumstances.

	ENVIRONMENTAL PROTECTION PLAN	Version: 2.0
	Approved By: Perry Blanchard	Date: April 30, 2025

5.5 Natural Disasters


Potential Environmental Concerns

Natural Disasters pose a potential risk for stress and/or injury to both wildlife and site personnel. Control measures and environmental protection procedures have been put in place to reduce this potential risk to wildlife and humans.

Natural disaster risks are identified through real-time meteorological monitoring, physical site conditions, and local observations. Official weather reports should be monitored for storm warnings, flood advisories, or seismic activity alerts. Physical indicators include increased precipitation, rapid changes in wind speed or direction, ground instability, or water level surges. Localized warning signs such as slope movement, erosion, or wildlife migration patterns can indicate an impending event. While the likelihood of such an event occurring at the site is low, this plan proactively addresses the potential risk to ensure preparedness.


Environmental Protection and Response Procedures

- a) **Early Detection and Monitoring:** The Project Manager or designated personnel will monitor real-time meteorological data, including official weather reports, flood advisories, storm warnings, and seismic activity alerts. Sources such as Environment Canada and local emergency response agencies should be consulted regularly for up-to-date information. Physical indicators such as changes in wind speed or direction, increased precipitation, or ground instability (e.g., shifting soil, eroding slopes) will be observed and reported to the Project Manager immediately. Localized warning signs, including wildlife migration patterns or changes in behavior, slope movement, or unusual erosion, will be monitored by site personnel and reported promptly.
- b) **Initial Response Actions:** If early indicators suggest a heightened risk of a natural disaster (e.g., a severe storm or flood), the Project Manager will immediately assess the situation and activate the site-specific emergency procedures. Personnel will be instructed to move to designated safe areas or evacuate if conditions become unsafe. Any necessary protective measures, such as reinforcing structures, stabilizing slopes, or ensuring proper drainage systems, will be enacted. In the case of an impending flood, all equipment and materials should be moved to higher ground or securely stored to prevent damage or contamination.
- c) **Communication and Coordination:** The Project Manager will communicate the identified risks and response actions to all site personnel. A clear line of communication will be maintained, with regular updates provided based on real-time data and evolving weather conditions. Emergency contacts, including local authorities, emergency response

	ENVIRONMENTAL PROTECTION PLAN	Version: 2.0
	Approved By: Perry Blanchard	Date: April 30, 2025

teams, and regulatory agencies, will be informed of the situation, and coordination with these entities will be established to ensure a unified response. If the natural disaster involves widespread impact (e.g., flooding, landslides), site personnel will follow the predetermined evacuation routes to ensure safe and organized relocation.

- d) **Environmental Protection and Damage Minimization:** All efforts will be made to minimize environmental impact during the response. For example:
- Preventing contaminants from entering nearby watercourses or sensitive ecosystems.
 - Mitigating soil erosion and protecting vegetation from storm or flood damage.
 - Ensuring that response actions are conducted in accordance with environmental regulations and best practices to minimize ecological disturbances.
- e) **Consultation with Regulatory Authorities:** The Project Manager or VP of Environment and Sustainability will consult with relevant regulatory authorities, such as local environmental agencies, to assess site conditions and environmental impacts, and to ensure that the appropriate legal requirements are met. Necessary permits for response actions (e.g., flood prevention, soil stabilization) will be obtained, and guidance on clean-up or remediation procedures will be followed.
- f) **Post-Event Analysis and Reporting:** After the natural disaster event has passed, a detailed assessment of the damage, effectiveness of response actions, and environmental impact will be conducted. A comprehensive report documenting the event, response actions, and any environmental damages will be prepared by the Project Manager. This report will be submitted to Maritime's VP of Environment and Sustainability within 30 days of the event and forwarded to the applicable regulatory agencies for further review and action.

	ENVIRONMENTAL PROTECTION PLAN	Version: 2.0
	Approved By: Perry Blanchard	Date: April 30, 2025

6.0 EPP CONTROL REVISIONS

This EPP will be revised as necessary to reflect site-specific environmental protection requirements and allow updates as work progresses or changes. All EPP holders may initiate revisions by forwarding proposed revisions to the Project Manager and/or the VP Environment and Sustainability. The following information will be provided on the Revision Request Form (see Appendix D) for all revision requests:


- section to be revised;
- nature of the revision;
- rationale for the revision (i.e., environmental safety, worker safety etc), and
- person submitting the revision request.

Approval for revisions will be required from Maritime. When the Project Manager and/or VP Environment and Sustainability approves a revision request, details of the revision will be distributed to all EPP holders and will be documented in the Revision History Log (Appendix E). Each revision will be accompanied by:

- revision instructions;
- list of sections being superseded; and
- an updated Table of Contents indicating the status of each section in the EPP.

When EPP holders receive a revision, they will, in a timely manner:


- read the text of the revision;
- check the control sheet to confirm that all the listed pages have been received;
- remove and destroy the superseded pages from their copy of the EPP;
- insert the revised pages in the proper place in their copy of the EPP;
- page check the EPP, using the updated table of contents to confirm the EPP is complete and current;
- enter the revision number and date entered on the Revision History Log;
- incorporate the revision into the area of responsibility, as appropriate, and
- confirm that their personnel are familiar with the revisions.

	ENVIRONMENTAL PROTECTION PLAN	Version: 2.0
	Approved By: Perry Blanchard	Date: April 30, 2025


7.0 CONTACT LIST

Table 7.1 Contact Information

DEPARTMENT	CONTACT INFORMATION
Canadian Coast Guard Environmental Response 24-Hour Report Line	St. John's 709-772-2083 Other Areas 1-800-563-9089
Environment and Climate Change Canada Canadian Wildlife Service	Kim Mawhinney Manager, Regulatory Affairs Tel: 709-772-7456 or 709-690-3382
Department of Fisheries and Oceans	Julie Whiteway Area Habitat Biologist, Central Tel: 709-292-5197
Department of Fisheries, Forestry and Aquaculture	24hr Forest Fire Emergency Line Tel: 1-866-709-3473 or 709-637-2408
Service NL Occupational Health and Safety Division	Grand Falls-Windsor Office Tel: 709-292-4400 Serious Workplace Accidents (24hrs)
Dept. of Environment, Climate Change and Municipalities Water Resources Management Division	Haseen Khan Director Tel: 709-729-2563 Email: hkhan@gov.nl.ca
Dept. of Fisheries, Forestry and Aquaculture - Wildlife Division	Kirsten Miller Senior Wildlife Biologist Tel: 709-637-2353
Dept. of Environment, Climate Change and Municipalities Pollution Prevention Division	Dan Michelsen, Director Tel: 709-729-2556 Email: michielsend@gov.nl.ca

	ENVIRONMENTAL PROTECTION PLAN	Version: 2.0
	Approved By: Perry Blanchard	Date: April 30, 2025

DEPARTMENT	CONTACT INFORMATION
Dept. of Fisheries, Forestry and Aquaculture Forestry Division	24hr Forest Fire Emergency Line Tel: 1-866-709-3473 or 709-637-2408
Dept. of Industry, Energy and Technology Mineral Lands Division	Kevin Sheppard, Director Tel: 709-729-6425 Email: KevinSheppard@gov.nl.ca
Department of Fisheries, Forestry and Aquaculture Crown Lands Administrative Division	Western and Labrador Regional Lands Office Tel: 709-637-2390

	ENVIRONMENTAL PROTECTION PLAN	Version: 2.0
	Approved By: Perry Blanchard	Date: April 30, 2025

8.0 REFERENCE MATERIAL

Canadian Council of Ministers of the Environment. 1994 and updates. Environmental Code of Practice for Aboveground Storage Tank Systems Containing Petroleum Products.


Department of Environment and Conservation, Water Resources Management Division. Environmental Guidelines for Stream Crossings, Culvert Installation and Fording.

Department of Natural Resources. Estimated 1995. Environmental Guidelines for Construction and Mineral Exploration Companies.

Department of Forest Resources and Agrifoods. 1998. Environmental Protection Guidelines for Ecologically Based Forest Resource Management (Stand Level Operations).

Gosse, M.M., A.S. Power, D.E. Hyslop, and S.L. Pierce. 1998. Guidelines for Protection of Freshwater Fish Habitat in Newfoundland and Labrador. Fisheries and Oceans, St. John's, NL.

Meades, W. (1990). *Ecoregion descriptions of Newfoundland and Labrador (Appendix 5)*. Government of Newfoundland and Labrador.

	ENVIRONMENTAL PROTECTION PLAN	Version: 2.0
	Approved By: Perry Blanchard	Date: April 30, 2025

9.0 SIGNATURE PAGE

Maritime Resources Corporation

The undersigned certify that they have reviewed, and understand their role and responsibility regarding:

ENVIRONMENTAL PROTECTION PLAN

As part of their Orientation.

Name (Printed): _____

Company: _____


Signature of above: _____

Date: _____

Name of Manager or Supervisor: _____


Manager or Supervisor's Signature: _____

Date: _____

	ENVIRONMENTAL PROTECTION PLAN	Version: 2.0
	Approved By: Perry Blanchard	Date: March 19, 2021


APPENDIX A

CONTROLLED COPY DISTRIBUTION LIST

	ENVIRONMENTAL PROTECTION PLAN	Version: 2.0
	Approved By: Perry Blanchard	Date: March 19, 2021

APPENDIX B

FUEL AND HAZARDOUS MATERIALS SPILL REPORT FORM

	ENVIRONMENTAL PROTECTION PLAN	Version: 2.0
	Approved By: Perry Blanchard	Date: March 19, 2021

Fuel and Hazardous Materials Spill Report Form

1. Name of reporter and phone number: _____
2. Time of spill or leak: _____
3. Time of detection of spill or leak: _____
4. Type of product spilled or leaked: _____
5. Amount of product spilled or leaked: _____
6. Location of spill or leak: _____
7. Source of spill or leak: _____
8. Type of accident - collision, rupture, overflow, other: _____
9. Owner of product and phone number: _____

10. Is the spill or leak still occurring: YES NO

11. Is the spill or leaked product contained: YES NO

If NO, where it is flowing and what actions are being taken for containment:

12. Wind velocity and direction: _____


13. Temperature: _____

14. Proximity to waterbodies, water intakes, and facilities: _____

15. Snow cover and depth, terrain, and soil conditions: _____


In the event of a reportable spill on-land or any spill regardless of size that may enter a waterbody frequented by fish must be reported immediately to:

Environmental Emergencies 24 Hour Report Line 709-772-2083 or 800-563-9089.

	ENVIRONMENTAL PROTECTION PLAN	Version: 2.0
	Approved By: Perry Blanchard	Date: March 19, 2021


APPENDIX C

DOCUMENT CONTROL AND AMENDMENT LIST

	ENVIRONMENTAL PROTECTION PLAN	Version: 2.0
	Approved By: Perry Blanchard	Date: March 19, 2021


DOCUMENT CONTROL AND AMENDMENT LIST	
Document Title: Environmental Protection Plan	Document Number:
Owner:	Review Frequency:

Version	Date of Revision	Date of Publish	Prepared By	Approved By	Revision Notes
1.0					

	ENVIRONMENTAL PROTECTION PLAN	Version: 2.0
	Approved By: Perry Blanchard	Date: March 19, 2021

APPENDIX D

REVISION REQUEST FORM

	ENVIRONMENTAL PROTECTION PLAN	Version: 2.0
	Approved By: Perry Blanchard	Date: March 19, 2021

REVISION REQUEST FORM

SECTION TO BE REVISED:

NATURE OF REVISION:

RATIONALE FOR REVISION: (i.e., environment/worker safety, etc.)

SUBMITTED BY:

DATE:

Please submit this request to the Maritime Resources Corporation Project Manager.

