Nalcor Energy – Lower Churchill Project

LCP Regulatory Compliance Plan - Generation

LCP-PT-MD-0000-EV-PL-0024-01

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1 PURPOSE

The purpose of this *Regulatory Compliance Plan* (RCP) is to describe the formal process to be followed by the Lower Churchill Project (LCP) for managing environmental regulatory compliance during Gateway Phases 3 and 4 of the LCP. Managing, tracking, and demonstrating regulatory compliance is critical for successful project execution.

Nalcor, as the owner and developer of the LCP is responsible to ensure that it is designed, constructed and operated in accordance with all regulations and commitments. This RCP is one component of the Project Environmental Management Plan that will be used to ensure that all environmental and compliance issues are properly addressed during the design and construction of the LCP.

Regulatory compliance describes the goal that corporations or public agencies aspire to in their efforts to ensure that personnel are aware of and take steps to comply with relevant laws and regulations in a timely manner. Due to the increasing number of regulations, the need for operational transparency and to satisfy ISO requirements, organizations are increasingly adopting the use of consolidated and harmonized sets of compliance controls. This approach is used to ensure that all necessary governance requirements can be met without the unnecessary duplication of effort and activity from resources.

2 SCOPE

This *Regulatory Compliance Plan* addresses a key functional area of the project execution and management process for the LCP as set forth in the LCP Environment Management System contained in the Project Execution Plan (Scope and Approach), document no. LCP-PT-MD-0000-PL-0001-01.

This RCP addresses the regulatory requirements arising from the Environmental Assessment under the *Canadian Environmental Assessment Act*, the Newfoundland and Labrador *Environmental Protection Act*, recommendations by an independent joint review panel, the commitments made during regulatory approvals processes, applicable acts, regulations and regulatory guidelines, and the project-initiated regulatory queries. It is applicable to engineering, procurement, construction, commissioning phases and associated physical components of the LCP Generation.

This RCP is not applicable for the operations phase of the asset. This RCP does not cover business-related laws and regulations such as tax, labour, health and safety legislation, and finance as they fall under different compliance processes and are handled by the

other functional areas (commercial, safety, human resources). The applicable management systems are described in the Project Execution Plan (Scope and Approach), document no. LCP-PT-MD-0000-PM-PL-0001-01, and documents referenced within it.

This RCP does not cover requirements of an engineering / technical design nature. The EPCM Consultant's engineering, procurement and construction management systems will ensure compliance with all technical Project requirements, related to engineering design codes and standards. Compliance with these codes and standards is part of normal engineering design and they will be detailed in Design Briefs for various work packages. Technical requirements for the SOBI Marine Crossing will be handled by the Contractor responsible for each work package.

This RCP does not address compliance with Newfoundland and Labrador labour and benefits requirements.

Figure 2-1 shows the regulatory compliance management framework for the Environment and Regulatory Compliance (ERC) Team. Path 1 on the figure shows the management framework described. The plan covers environmental regulatory requirements and permitting associated with activities that will occur during construction.

This plan also includes environmental assessment (EA) commitments, which shall be identified and managed by the ERC Team, as well as regulatory requirements not covered by permits. Complying with EA commitments (See LCP Generation/L-ITL Environmental Assessment Commitments/Requirements Management Plan LCP-PT-MD-0000-EA-PL-0002-01) will extend well into the Operations phase of the Project. Currently, commissioning is scheduled to end in late 2017, which will mark the conclusion of this plan.

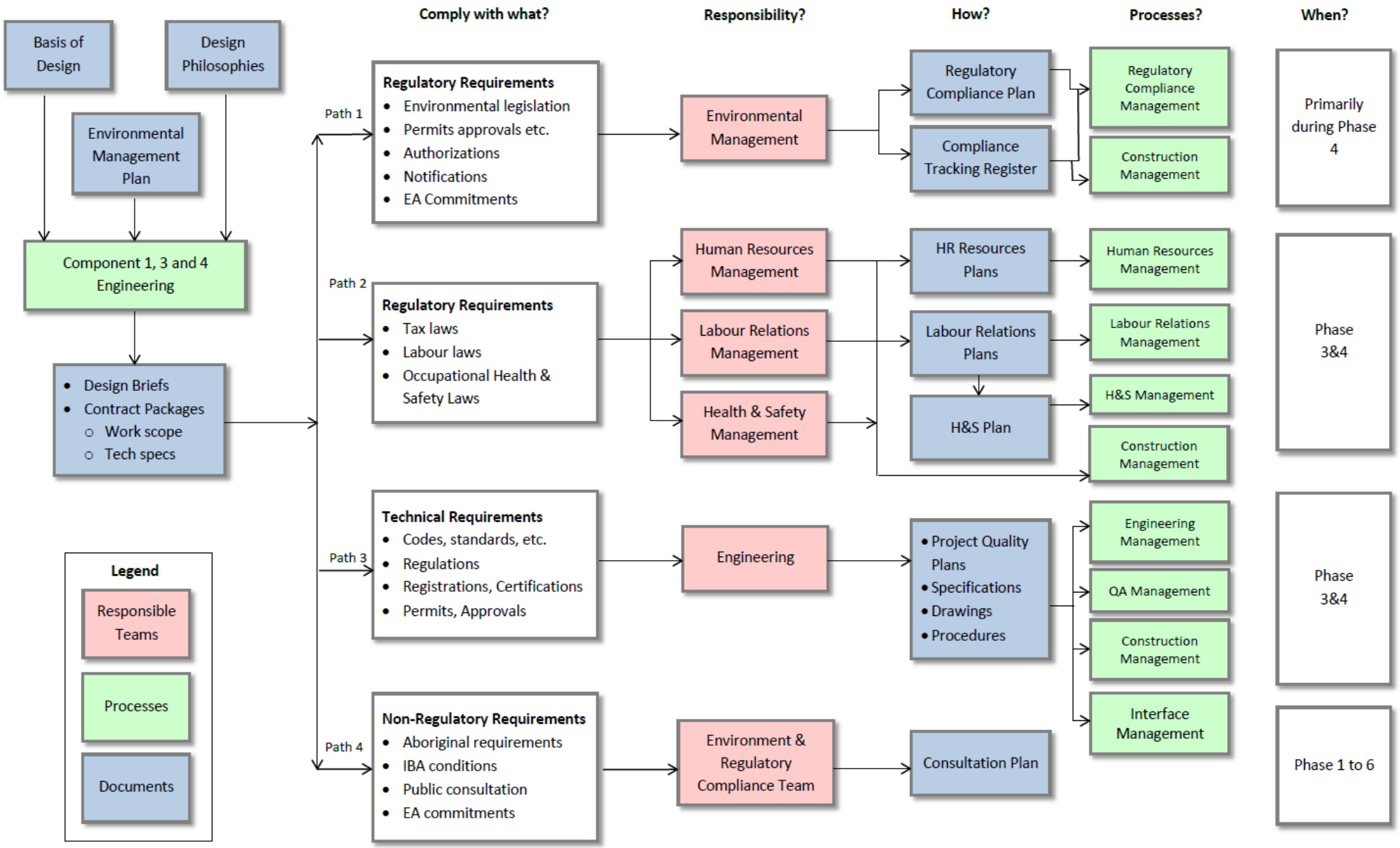
Other requirements that are excluded from this Plan, but which are covered by other management systems are represented on Figure 2-1 as Paths 2, 3 and 4:

- Path 2 shows regulatory requirements of a non-environmental and non-technical nature, such as tax, labour, health and safety legislation, etc. The project management systems will be used to ensure compliance with provisions of these laws and regulations. The applicable management systems are described in the Project Execution Plan (LCP-SN-CD-0000-PM-PL-0002-01) and documents referenced within it.
- Path 3 relates to requirements of an engineering/technical nature. The Project Delivery Team (PDT) engineering, procurement and construction management systems will ensure compliance with all technical Project requirements, including relevant codes and standards. Compliance with these codes and standards is

part of normal engineering design and they will be details in design Briefs for various work packages.

- Path 4 shows non-regulatory requirements. These requirements generally require interaction between Nalcor and public stakeholders, including the Innu Nation and other aboriginal groups. Documented commitments made by Nalcor as part of the Environmental Assessment process will be also jointly managed by the Environment and Regulatory Compliance (ERC) PDT, the latter as part of Path 1.

Figure 2-1: Compliance Management Framework



3 DEFINITIONS

Decision Gates — A Decision Gate is a predefined moment in time where the Gatekeeper has to make appropriate decisions whether to move to the next stage, make a temporary hold or to terminate the project. The option to recycle to the current stage is considered an undesirable option unless caused by changes in business conditions.

Project Management Team — The Project Management Team (PMT) is led by the Project Director and is made up of project leaders and key functional representatives. The PMT meets periodically to identify issues that may affect cost and schedule and to determine how such issues should be resolved.

4 ABBREVIATIONS AND ACRONYMS

CEAA	Canadian Environmental Assessment Act
CTR	Compliance Tracking Record
DFO	Department of Fisheries and Oceans
EA	Environmental assessment
EMC	Environmental Management Committee
EMS	Environmental Management System
ERC	Environmental and Regulatory Compliance
EPCM	Engineering, Procurement and Construction Management
EPP	Environmental Protection Plan
HSE	Health, Safety, and Environmental
HVac	High voltage alternating current
HVdc	High voltage direct current
IBA	Impacts and Benefits Agreement
NWPA	Navigable Waters Protection Act
PDM	Project Document Management
RA	Responsible authority

RCP	Regulatory Compliance Plan
SOBI	Strait of Belle Isle

5 REFERENCE DOCUMENTS AND/OR ASSOCIATED FORMS

LCP-PT-MD-0000-EV-PL-0002-01	Integrated Environmental Management Plan
LCP-PT-ED-0000-EA-SY-0001-01	Environmental Impact Statement and Supporting Documentation for the Lower Churchill Hydroelectric Generation Project
LCP-PT-MD-0000-EA-PL-0001-01	LCP Generation Environmental Assessment Commitment Management Plan
LCP-PT-ED-0000-EV-RG-0001-01	Lower Churchill Project Permit Registry
LCP-PT-MD-0000-EV-PL-0021-01	LCP Master Spill Response Plan – All Components
LCP-PT-MD-0000-HS-0004-01	LCP Project-Wide Emergency Response Plan
LCP-PT-MD-0000-EV-PL-0011-01	LCP Integrated Project-Wide Environmental Protection Plan – Generation and Labrador Transmission Assets

6 PROJECT DESCRIPTION

This document governs the following sub-projects.

6.1 MUSKRAT FALLS GENERATION

The Muskrat Falls Generation Project will include the following sub-components which are broken down under the five principal areas of the development:

- 22 km of access roads, including upgrading and new construction, and temporary bridges;
- A 1,500 person accommodations complex (for the construction period); and
- A north RCC overflow dam;
- A south rockfill dam;
- River diversion during construction via the spillway;
- 5 vertical gate spillway;
- Reservoir preparation and reservoir clearing;
- Replacement fish and of terrestrial habitat;
- North spur stabilization works;
- A close coupled intake and powerhouse, including:
- 4 intakes with gates and trash racks;
- 4 turbine/generator units at approximately 206 MW each with associated ancillary electrical/mechanical and protection/control equipment;
- 5 power transformers (includes 1 spare), located on the draft tube deck of the powerhouse; and
- 2 Overhead cranes each rated at 450 Tonnes

Figure 6-1 Muskrat Falls Generating Facility

6.3 Labrador Transmission Asset (LTA)

LTA consists in the AC transmission line system form Churchill Falls to Muskrat Falls, specifically:

- Churchill Falls switchyard extension;
- Muskrat Falls switchyard;
- Transmission lines from Muskrat Falls to Churchill Falls: double-circuit 315 kV ac, 3 phase lines, double bundle conductor, Single circuit galvanized lattice steel guyed suspension and rigid angle towers; 247 km long;
- 735 kV Transmission Line at Churchill Falls interconnecting the existing and the new CF switchyards; and
- Labrador Fibre Project (Nalcor's participation in the Aliant led initiative).

7 ROLES AND RESPONSIBILITIES

7.1 SCOPE OF RESPONSBILITIES

As detailed in Section 10.2 of the Project Execution Plan (Scope and Approach), document no. LCP-PT-MD-0000-PL-0001-01, Nalcor has divided the Project into Sub-Projects for ease or execution, cost effectiveness and management effectiveness. In terms of overall management however, Nalcor retains responsibility.

The project will distribute the day-to-day management responsibility for Regulatory Compliance Management (by Sub-Project) to the following entities, as displayed in the attached Figure 1:

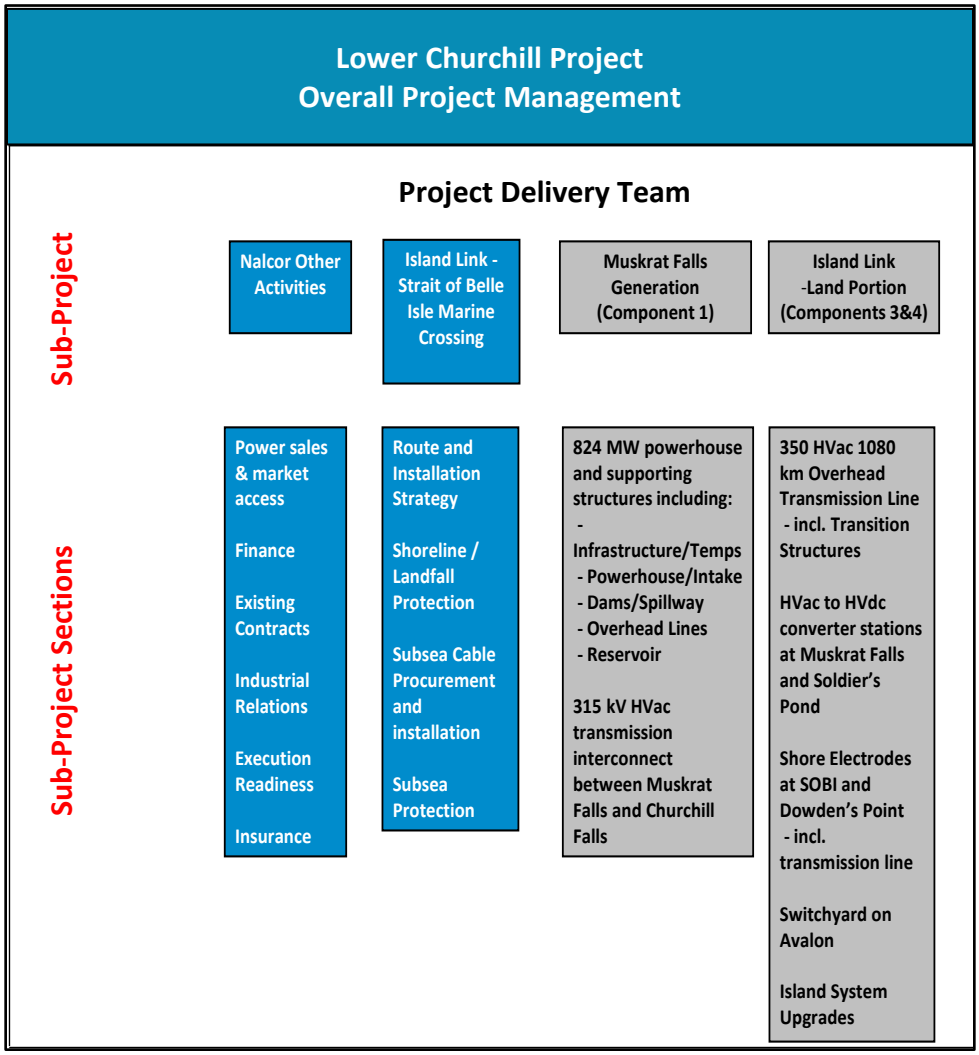


Figure 7-1 - Delivery Strategy

The Integrated Project Delivery Team (PDT) has overall responsibility for Regulatory Compliance Management for each of the Sub-Projects encompassed within the scope of this RCP.

The Environment and Regulatory Compliance (ERC) Team is responsible for:

- liaising with the Innu Nation through the Environmental Management Committee and with other public stakeholder groups to ensure that negotiated agreements and documented commitments are honoured (as per various Nalcor reference documents such as the IBA, Consultation Plan, etc);
- Interaction with regulatory authorities and stakeholder groups will ensure strong working relationships, and ensure all permits are submitted to regulatory authorities in a timely manner.
- Ensuring that the Project complies with all applicable laws, and that negotiated agreements with aboriginal groups and documented commitments to other stakeholders are honoured.
- Providing information to the Project Delivery Team as required, and preparing application packages for permits not assigned to the contractor.
- Carry out periodic reviews (audits) of the Project's Path 1 compliance management system in order to identify areas for improvement.

The ERC will develop and implement the Path 1 compliance management system, with the following accountabilities:

Project Director

The approver of this *Regulatory Compliance Plan*. Responsible to verify that this Plan accurately reflects the selected management approach for the Project and that it is implemented consistently across the Project.

Project Manager(General and Marine Crossings)

Accountable for the activities and performance of all Integrated Project Delivery Team (PDT) staff in relation to the Regulatory Compliance Plan's development, implementation, and management. In some situations they will also be accountable for activities completed by the Contractors. The *Project Manager* will be kept informed of all responsibilities related to the compliance plan.

Project Component Managers

The Project Managers are responsible for providing direction and standards to the Environmental and Regulatory Compliance Lead for each of the work scopes during the design of the Project to ensure that the Project designs reflect the overarching Project policies and principles with respect to environmental management.

The Project Managers will ensure consistency between project components with respect to the incorporation of environmental management into engineering design and

construction, ensuring the approach reflects the requirements and commitments identified within aboriginal agreements or of the EA as communicated by the ERC Group. The Project Managers will communicate design modifications or additions to the Environmental and Regulatory Compliance Lead.

ERC Manager

Responsible for the development, implementation, and maintenance of this Project-wide Regulatory Compliance Plan.

- The ERC Manager is responsible to ensure that the Project complies with all applicable laws, and that negotiated agreements with aboriginal groups and documented commitments to other stakeholders are honored;
- The ERC Manager will carry out periodic reviews (audits) of the Project's compliance management system in order to identify areas for improvement;
- The ERC Manager will liaise with the Innu Nation through the Environmental Management Committee and other public stakeholder groups to ensure that negotiated agreements and documented commitments are fulfilled; and
- Providing guidance to management through interpretation of EMP practices and procedures and applicable regulations and standards.

ERC Lead(s)

The ERC Lead or designate will be the primary interface between various regulatory bodies throughout the regulatory approvals management process. This individual will inform the PDT of any special information requirements that regulators may have on specific permit applications so that these applications are properly completed. The ERC lead. The ERC Lead shall:

- Be the primary point of contact with the Permits Coordinator when processing permit applications and reviewing the Permit Register.
- Play a consultation role in dealings with the Environmental Engineering Manager, but will be directly responsible/accountable for all interactions with outside stakeholders and regulators. These individuals will be kept informed of all aspects dealing with the Regulatory Compliance Plan;
- Review of the Compliance Tracking Record;
- Interface with regulatory authorities, as required;
- Review and approval of regulatory queries;
- Obtain environmental permits and authorizations;
- Advise on regulatory requirements, regulatory conditions and regulatory queries;
- Develop strategies with the ERC Team to resolve regulatory issues that may arise;
- Follow-up on closure of all conditions related to regulatory compliance;
- Advise Project and Area Managers on regulatory compliance issues, as required;
- Follow-up on closure of all conditions related to regulatory queries;
- Provide technical support for interactions with outside stakeholders and

regulators, as required;

Environmental Engineering Manager will report directly to the ERC Manager and will be primarily responsible for ensuring that the Regulatory Compliance Plan is appropriately incorporated into the design and construction of the Project components. This will include the following:

- Prepare design criteria and conduct technical review of specifications and drawings;
- Incorporation of the Company's environmental commitments and requirements into environmental programs;
- Preparation, review, acceptance and implementation of the PW-EPP, and Rehabilitation plans for project and construction sites;
- Verify regulatory compliance with periodic audits and inspections;
- Evaluate bidders of environmental contracts;
- Implementation of an environmental training program for all site personnel including contractors and suppliers;
- Assistance to project management and construction contractors in the implementation of the Project EMP for construction;
- Planning, implementing and coordinating the Project Environmental Program to reduce and eliminate incidents that may result in environmental damage and resultant financial loss. Conducting or directing studies to identify environmental risks and hazards and to analyze the cost/benefit of remedial measures and/or processes.
- Conducting regular audits of the RCP and EMP and issuing audit reports including monitoring, close-out report recommendations, and informing of revisions to the Project environmental plans are required;
- Maintaining a good working knowledge of current regulations, codes and industry best practices, and acting as a resource to project management and construction line management;
- Monitoring On Site Environmental Monitors, as well as project site environmental inspection and reporting and following up as needed;
- Address non-conformances;
- Providing technical assistance during contractor environmental review meetings, when appropriate, and maintaining records of those meetings;
- Coordinating and providing support for investigations of all environmental incidents and issuing detailed incident investigation reports to project management staff;
- Monitoring the implementation of mitigative measures resulting from investigations and conducting periodic follow-up; maintaining a tracking system for follow-up;
- In conjunction with project management staff and site contractors, coordinating the implementation and maintenance of a Spill Response Plan; and
- Ensuring records, files and reports are maintained until the end of the project.

Environmental Engineering Coordinators will report directly to the Environmental Engineering Manager and will be responsible for carrying out internal reviews of the Path 1 compliance management system, and to generate audit reports on a quarterly basis. Responsibilities will also include:

- Ensuring development and implementation of Environmental Plans for associated construction sites;
- Identifying construction activities, operations or facilities requiring environmental permits and will provide support and consultation as required for development of permit applications/notifications.
- Supporting the Construction Manager to ensure Contractor compliance with respect to technical and legislative responsibilities, including evaluating regulatory equivalencies and variations.
- Providing assistance to project management and construction contractors, throughout the Environmental Engineering Manager, in the implementation of the Project EMP for construction;
- Planning, implementing and coordinating the Project Environmental Programs to reduce and eliminate incidents that may result in environmental damage and resultant financial losses;
- Conducting or directing studies to identify environmental risks and hazards and to analyze the cost/benefit of remedial measures and/or processes;
- Conducting regular audits of the RCP and EMP and issuing audit reports. This includes monitoring, close-out report recommendations, and informing the Environmental Engineering Manager whenever revisions to the project environmental plans are required;
- Maintaining a good working knowledge of current regulations, codes and industry best practices, and acting as a resource to the project through the ERC Manager;
- Ensuring that the construction Contractors and Subcontractors provide comprehensive environment awareness sessions and training specific to the work for all their staff;
- Monitoring the Project site, undertaking environmental inspection and reporting and following up as needed. All environmental incidents are to be reported, assessed and communicated to all parties involved;
- Monitoring the implementation of each contractor's work procedures and ensuring that those procedures are in line with the EPP's.
- Providing technical assistance during contractor environmental review meetings, when appropriate, and maintaining records of those meetings;
- Coordinating and providing support for investigations of all environmental incidents and issuing detailed incident investigation reports to project management staff;
- Monitoring the implementation of mitigative measures resulting from investigations and conducting periodic follow-up; maintaining a tracking system

for follow-up;

- In conjunction with project management staff and site contractors, coordinating the implementation and maintenance of a Spill Response Plan; and
- Ensuring records, files and reports are maintained until the end of the project; liaison with all stakeholders including Company representatives, project environmental staff and regulatory agencies.

EA/EEM Coordinator – Environmental Assessment (EA) Commitments and Environmental Effects Monitoring Coordinator will support the ERC Leads in addition to responsibility for the following:

- Contribute to overall environmental management and regulatory compliance related to field programs and construction works associated with the Project;
- Be responsible for implementation of various environmental programs consistent with EA Commitments and other conditions of government release from the EA. Coordinate and participate in the development of environmental effects monitoring plans, and assist in the coordination of fish and wetland habitat compensation execution;
- Maintain strong interfaces and working relationships internally and with regulatory approval authorities, including attending internal and external meetings as necessary for Environmental Effects Monitoring Programs;
- Coordinate environmental effects monitoring programs such as Avifauna, Historic Resources, Species at Risk etc.;
- Provide technical guidance to team members on a wide range of environmental and regulatory matters;
- Coordinate the fulfillment of commitments/requirements of EA release, such as participation in management committees and on-going consultations, follow-up and monitoring activities. Ensure lessons learned are captured and reflected in ongoing work as appropriate in order to deliver upon the continuous improvement mindset;
- Coordinate with the Project Team on field activities and provide information necessary for Aboriginal/public consultation (e.g. Community Liaison Committee); and
- Coordinate construction environmental effects monitoring plans.

On Site Environmental Manager will have the responsibility to ensure construction activities abide by the Regulatory Compliance Plan, including all permits, laws and legislation, along with:

- Ensure construction activities abide by established environmental plans which include: RCP, WMP, EMP, EPP, Master Spill Response Plan and Rehabilitation Plan;
- Ensure that Contractors have the required environmental plans and personnel in place before the start of activities to which the plans refer;

- Carry out monitoring and inspections to assess adherence to environmental regulations and conditions of approvals and ensure mitigation measures are functioning as specified;
- When required, complete sampling of various media in the field, carry-out proper laboratory submission procedures and interpret analytical results against applicable regulatory criteria;
- Complete or oversee the completion of site Environmental Site Inspection and Incident Report forms on the prescribed project schedule;
- Provide updates as required to the Environmental Engineering Coordinator and HSE Manager;
- Attend meetings with Contractors as required; and ensure that pre and post site conditions are properly documented through photographs and reports.

On-Site Environmental Monitors (OSEM) are responsible for monitoring construction activities including providing information to the On-Site Environmental Manager, the *HSE Manager* and *Environmental Coordinators* for inclusion into audit reports. *OSEM's* shall assist the *Permits Coordinator* develop the permit application package by supplying field information, as well as:

- Ensuring construction activities abide by established environmental plans which include: RCP, WMP, EMP, EPP and Rehabilitation Plan;
- Carrying out monitoring to assess adherence to environmental regulations and ensure mitigation measures are functioning as specified;
- When required, completing sampling of various media in the field, carry-out proper laboratory submission procedures and interpret analytical results against applicable regulatory criteria;
- Regular inspection of site works and completion of standard Environmental Site Inspection forms; and
- Providing updates as required to the On-Site Environmental Coordinator, Environmental Engineering Coordinator and the onsite Construction Manager; and
- on-site environmental monitoring of construction activities and relaying compliance instructions to Contractors following audits or reviews of performance.

Permits Coordinator will be responsible for preparing the majority of permit applications, ensuring Contractor's permits are obtained, submitting these to the ERC Lead, updating and managing all permit documentation, and communicating with appropriate field personnel to ensure that all permit conditions are complied with and followed up.

- The *Permits Coordinator* will be responsible for managing the Permit Register, including updating it regularly, and incorporating all conditions into the Registry to ensure that these are complied with in a timely manner. The *Permits*

Coordinator will also review the conditions of permits and will recommend to the ERC Lead that a variance be applied for where field conditions are such that the work cannot conform to the conditions of the permits. The *Permits Coordinator* will recommend to the ERC Lead, the details of the suggested variance;

- The *Permits Coordinator* will manage the approvals management process, and ensure that appropriate links exist between the Permit Register and the project schedule and document control system;
- The *Permits Coordinator* shall review the Project-Wide Environmental Protection Plan to ensure that it reflects the conditions of permits and make recommendations on changes where applicable;
- The *Permits Coordinator* will consult with and support the Environmental *Coordinators, On-Site Environmental Monitors and Construction Managers* as required on permit related matters; and
- The permits coordinator will be responsible (along with the ERC Lead) for communicating with Contractors related to permit application submission.

Construction Managers / HSE Manager (Muskrat Falls) will be responsible for ensuring Contractor compliance with the scope of work, technical documents and applicable legislation, and shall have authority to approve or reject all scope change requests.

Interface Manager will be responsible for initiating and implementing the Scope Change process in conjunction with the *Project Component Manager.* Approval of all scope changes will be reviewed by the *Interface Manager.*

Area Managers will be consulted to aid in identifying environmental, resource and land use constraints and construction activities, operations or facilities requiring environmental permits. They are responsible for providing engineering information to the *Permits Coordinator* and will be responsible for communicating with Contractors related to permit application submission. They will also be consulted by the *SLI Permits Coordinator* on aspects of permit applications and documentation, and be aware of EA commitments and consider them in the development of designs and technical specifications.

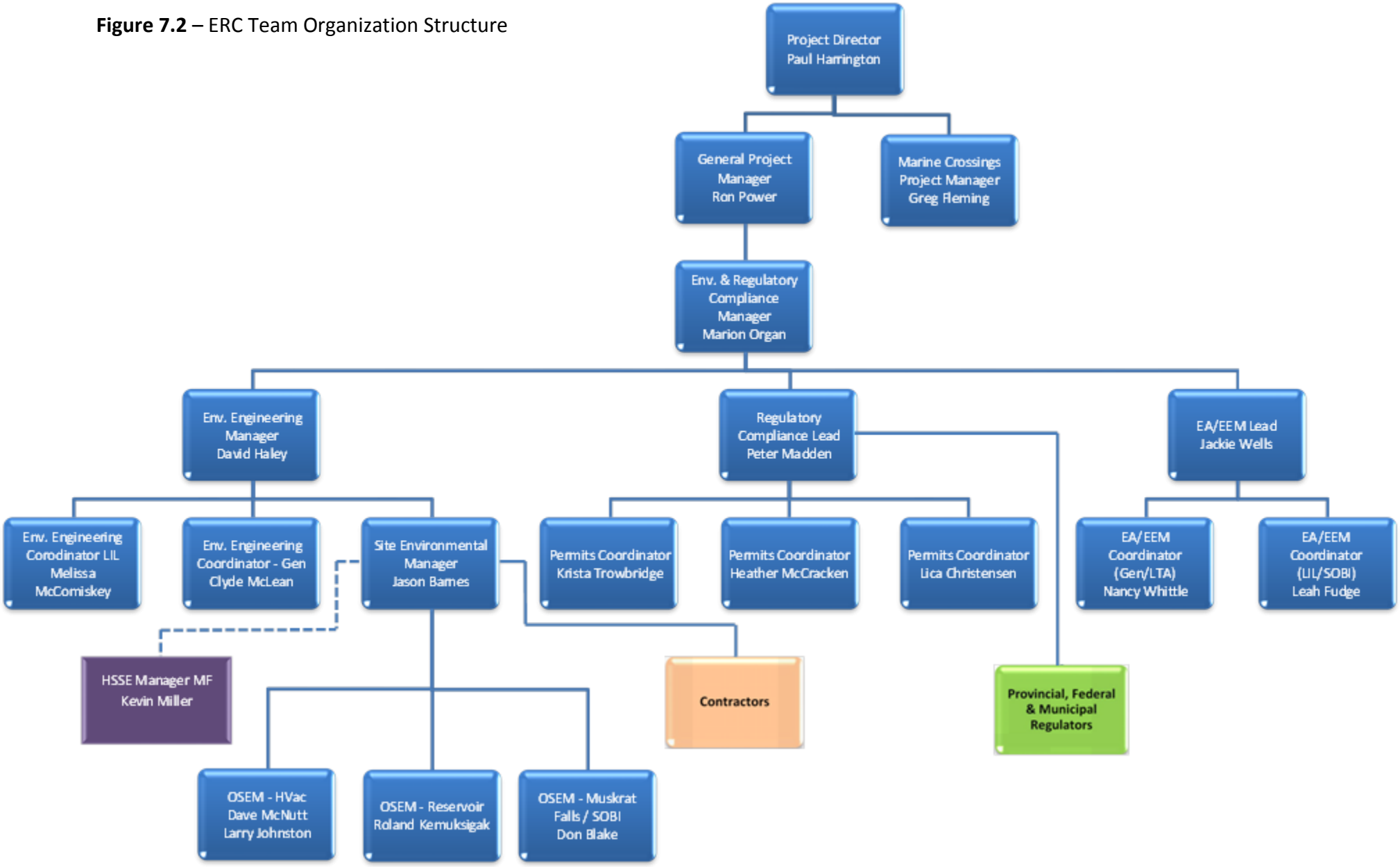
GIS Specialist shall be responsible for analysing geo-referenced data to identify land use, resource, and environmental constraints that may affect the Project. This person shall support SLI's environmental management team or serve as a resource whenever spatial information requires analysis.*Package Engineers* provide input to assist in obtaining necessary regulatory approvals. They review the PDT's work plans while ensuring regulatory compliance for design and construction activities.

Project Staff will provide support to all Construction Managers and Coordinators, as required.

7.2 CONTRACTORS

Prime contractors and their sub-contractors will be responsible for executing the work within the scope of their contract packages in full compliance with all Project requirements, as identified to them, and within all laws. Their responsibility includes cooperating with the ERC Team, particularly with respect to timely preparation and submission of permit applications that are their responsibility. All permit documentation (e.g. copies of permit applications, correspondence with regulatory agencies, permits, etc) shall be provided to the ERC Team who will track all permit conditions.

Figure 7.2 – ERC Team Organization Structure



7.4 DIVISION OF RESPONSIBILITIES IN REGULATORY COMPLIANCE

Table 1 shows the various responsibilities that the ERC and Contractor have throughout the Regulatory Compliance Process.

Table 1: Permitting Division of Responsibility Matrix Scope

Core Activity	Environment & Regulatory Compliance Team	Contractor	Interaction Notes
Prepare Component Regulatory Compliance Plan	R		
Identify activities, operations or facilities requiring environmental permits and approvals from Work Packages/ Dictionaries	R		
Consult with regulatory agencies	R	R	Contractors only for work site gov't service level of permits
Identify permit application forms	R		
Compile information from engineering and field surveys required for completing permit applications	R		
Complete permit applications	R		
Activate permit tracking system	R		
Submit permit applications to Nalcor		R	
Submit permit applications	R		

Core Activity	Environment & Regulatory Compliance Team	Contractor	Interaction Notes
to EMC			
Review EMC comments, modify and submit permits to regulatory agencies	R		
Follow-up with government agencies	R		
Review conditions on permits and approvals for problems with compliance	R		
Finalize permits and approvals	R		
Maintain copies of permits/approvals and ensuring copies are available at work sites	R		
Maintain copies on Environmental Registry and provide copies to EMC	R		
Monitor and maintain permit tracking system	R		
Provide metrics on permit schedule to Project Delivery Team	R		
Implement conditions of permits/approvals, audit, inspect and monitor	R		
Coordinate renewals of permits/approvals as required	R		

8 NALCOR ENERGY ENVIRONMENTAL POLICY AND GUIDING PRINCIPLES

Nalcor Energy, as Owner of the Lower Churchill Project, and its employees share a set of common values based on open communication, accountability, safety, honesty, trust, teamwork, respect and dignity, and leadership. These values are reflected in Nalcor's Environment Policy and Guiding Principles, which was established by Hydro (now a subsidiary of Nalcor Energy) in 1997 and updated in 2006.

Nalcor's overall environmental policy is based on the principle of sustainable development, which espouses a balance among environmental, economic and social aspects of business. Specifically, as required by the ISO 14001 Standard, the Policy commits to preventing pollution, complying with legal and other requirements, and continually improving environmental performance. Nalcor Energy also supports and implements the principles and goals of the Canadian Electricity Association.

Environmental Policy and Guiding Principles

All Nalcor Energy companies will help sustain a diverse and healthy environment for present and future Newfoundlanders and Labradorians by maintaining a high standard of environmental responsibility and performance through the implementation of a comprehensive environmental management system.

The environmental principles that follow guide Nalcor Energy companies' environmental actions and decision-making:

Prevention of Pollution

- implement reasonable actions for prevention of pollution of air, water, and soil and minimize the impact of any pollution which is accidental or unavoidable;
- use the Province's natural resources in a wise and efficient manner;
- incorporate energy efficiency into all elements of asset management, and promote energy efficiency for our customers and other stakeholders;
- maintain a high standard of emergency preparedness in order to respond quickly and effectively to environmental emergencies; and
- recover, reduce, reuse and recycle waste materials whenever feasible.

Improve Continually

- audit facilities to assess potential environmental risks and to identify opportunities for continual improvement of environmental performance;
- establish environmental objectives and targets, and monitor environmental performance;
- integrate environmental considerations into decision-making processes at all levels;
- empower employees to be responsible for the environmental aspects of their jobs and ensure that they have the skills and knowledge necessary to conduct their work in an environmentally responsible manner; and
- add value by engaging key stakeholders and partners.

Comply with Legislation

- comply with all applicable environmental laws and regulations, and participate in the Canadian Electricity Association's Sustainable Electricity Program;
- periodically report to the Board of Directors, Leadership Team, employees, government agencies, and the general public on environmental performance, commitments and activities;
- monitor compliance with environmental laws and regulations, and quantify predicted environmental impacts of selected activities on the environment; and
- respect the cultural heritage of the people of the Province and strive to minimize the potential impact of Corporate activities on heritage resources.

Approved by:

Date: July 29, 2013

Version: 4

nalcor energy

Figure 8.1 - Nalcor Energy's Environmental Policy and Guiding Principles

9 REGULATORY AGENCIES AND APPLICABLE ACTS AND REGULATIONS

The relatively large geographical extent, duration and variety of the Project's construction activities result in the involvement of a large number of regulatory agencies. No one department has regulatory authority with jurisdiction over the project. Attachment B.1 lists the organizations that have jurisdiction or a consultative role throughout the Project design and construction phase. The specific legislation, the applicable act and responsible department for federal and provincial agencies are identified in the table. Although guidelines are not regulatory requirements, both EIS documents committed to meeting the guidelines during the regulatory processes and therefore they are considered to be mandatory requirements as conditions of approval. If variances or clarifications from regulatory requirements are required an alternative approval process may be required.

10 STAKEHOLDER ENGAGEMENT

10.1 IDENTIFIED STAKEHOLDERS

The *Lower Churchill Hydroelectric Generation Project - Stakeholder Engagement Strategy, Post Environmental Assessment Release* (Nalcor document LCP-PT-MD-0000-SM-ST-0001-01) provides details about Nalcor's public and aboriginal consultation plan. This document, together with relevant sections of the Lower Churchill Innu Impacts and Benefits Agreement (the "IBA"), describes stakeholder engagement relevant to environmental management of the Project.

The Project's Consultation Plan and the IBA requirements will guide Nalcor when engaging with various stakeholders to ensure all documented commitments made by Nalcor, whether through the EA process or the IBA, are honoured. The ERC Team will provide support, as required, through the consultation process.

10.2 INNU NATION

Environmental management of the generation and transmission components of the LCP which are located in Labrador will be undertaken in part by an Environmental Management Committee (EMC), established under Chapter 5 of the IBA. The EMC will operate throughout Project construction and 5 years into Project operations and will

consist of 4 members – 2 members appointed by Innu Nation, 2 members appointed by Nalcor.

The mandate of the EMC includes:

- maintaining and updating environmental mitigation measures proposed by Nalcor during environmental assessment as well as any additional mitigation measures resulting from the issuance of permits:
- reviewing and evaluating the Project's environmental policies, environmental management systems and environmental monitoring programs;
- developing and recommending policies and measures to facilitate Innu access to the Project area and to protect Innu historic resources;
- authority to make recommendations for additional mitigation, corrective action and improvement based on principles of sustainable development and adaptive management.

10.3 OTHER STAKEHOLDERS

The Crown's duty to consult and accommodate Aboriginal and treaty rights is a fundamental matter of social justice which invokes very solemn legal obligations[1]. Accordingly, Nalcor has initiated consultations with other stakeholders (i.e. Nanatsiavut Government, Quebec Innu, NunatuKavut (formerly the Labrador Metis), and the general public) throughout the EA process, and will continue to engage these groups throughout the construction and operations phase.

Direction shall be provided to the Project Delivery Team (PDT) with respect to any commitments made through consultation with these groups, so that these commitments can be honoured throughout Phases 3 and 4.

[1] *The Crown's Constitutional Duty to Consult and Accommodate Aboriginal and Treaty Rights*, Research paper prepared by Maria Morellato of Blake, Cassels & Graydon LLP for the National Centre for First Nations Governance, February 2008.

11 REGULATORY COMPLIANCE REQUIREMENTS

Regulatory requirements must be met for the Project in support of general regulatory approvals and authorizations. There are four categories of regulatory requirements necessary for this project:

- Environmental Assessment terms and conditions of approval;
- Environmental Assessment commitments;
- Permits, approvals and authorizations; and
- Environmental compliance monitoring

11.1 TERMS AND CONDITIONS OF EA APPROVAL

A number of terms and conditions will be made on the regulatory approval for the Lower Churchill Project:

- LCP-PT-ED-0000-EA-SY-0001-01 Environmental Impact Statement and Supporting Documentation for the Lower Churchill Hydroelectric Generation Project.

These conditions must be met as a part of the LCP regulatory approval under the *Canadian Environmental Assessment Act* and the Newfoundland and Labrador *Environmental Protection Act.* A listing of those conditions will be made available upon release of the EAs by the ministers of environment. The status of these conditions will be monitored on the Environmental Registry on a quarterly basis. The frequency may increase depending on the timing with regulatory permits and authorizations.

11.2 EA COMMITMENTS

A number of project commitments were made in both environmental assessments and throughout the public review process. The commitments for the Generation and LITL EA's are listed in the LCP Generation Environmental Assessment Commitments/Requirements Management Plan (LCP-PT-MD-0000-EA-PL-0002-01). These commitments must be met as part of the Lower Churchill Project's regulatory approvals under the *Canadian Environmental Assessment Act* and *Environmental Protection Act.*

The EA commitments for both assessments will be entered into an Action Registry for EA Commitments and Requirements management system by Nalcor. The status of commitments will be monitored by the ERC Team on a quarterly basis. The frequency

may increase to coincide with the timing of regulatory permits and authorizations. Refer to the above-noted document for details.

11.3 REGULATORY PERMITS/AUTHORIZATIONS

There are several regulatory permits and authorizations required for the construction phase of the Lower Churchill Project. A permitting registry was developed by Hatch (2008), LCP-PT-ED-0000-EV-RG-0001-01 Lower Churchill Project Permit Registry, which contains a listing of consents, licenses, permits, notification and approvals permits for the entire project. Attachment B.2 provides this listing which identifies the following:

- project component,
- project phase,
- description of consent, approval, permit, notification, compliance, etc.
- legislation,
- regulatory department,
- application approval time (ranged),
- typical conditions,
- validity period, and
- application fee

There may be miscellaneous work programs that will develop as the project proceeds. The regulatory permitting and authorizations for these programs will be addressed on a case-by-case basis.

11.3.1 Project Delivery Team Scope

Critical input is required from Project Delivery Team (PDT) Package engineers in the form of design briefs, engineering work package plans (including clearly worded scopes of work), technical specifications, and scope changes.

As permit application forms are developed, the ERC Team will interact frequently with Package engineers, and will request additional information, as needed. Meetings will be held as required with the goal of identifying information gaps and assigning appropriate staff to collect and deliver the requested information to the ERC Team.

To ensure that permits/approvals are always in complete alignment with engineering work packages, it is extremely important that any change in the scope of work, however minor (more specifically, any change involving a permitted activity), be effectively communicated to the ERC Team in a timely manner. Therefore, the ERC Environmental

Engineering Manager will be responsible for ensuring that this information flow is facilitated.

The ERC Team is generally responsible for preparing permit applications. These will be forwarded to the Environmental Management Committee for review. Based on its review the Environmental Management Committee may recommend changes to the ERC Team. The ERC team will take these recommendations into consideration and may require the permit coordinate modify the application before submission to the regulatory authorities.

The responsibility for preparing License to Occupy Crown Land rests with Properties team. Contractors will be preparing smaller government services permits for site operations (e.g. fuel tank registrations required under the Storage and Handling of Gasoline and Associated Products Regulations). In these latter cases, the contractor submits the applications to the ERC team who will forward this application to Service NL. For technical clarification related to these permits the Contractor can interface directly with regulatory authorities.

11.4 ENVIRONMENTAL COMPLIANCE MONITORING

Environmental compliance monitoring includes all environmental monitoring of a proponent's activities by regulatory authorities to ensure compliance with regulatory and self-imposed environmental surveillance. Regulatory environmental surveillance is monitoring conducted by staff of regulatory authorities to verify compliance with applicable legislation and conditions of regulatory authorizations, issued for the Project. Self-regulatory environmental surveillance occurs when the proponent conducts monitoring either to ensure compliance with existing regulation and guidelines and/or to monitor its own activities relative to internal commitments of self-imposed limits or standards.

The ERC Team and will be responsible for ensuring on-site compliance with conditions of permits. Weekly reports will be issued advising of status. Compliance with conditions of permits will be tracked. Administrative conditions such as reporting/completion of forms will be the responsibility of the ERC Team who will track all permits.

11.5 ENVIRONMENTAL EFFECTS MONITORING

The Environmental Effects Monitoring (EEM) Program has been developed to examine predictions made as part of the environmental assessment process. The ERC Team will develop various Protection and Environmental Effects Monitoring plans in collaboration with subject matter experts and in consultation with the appropriate regulatory authorities. EEMP's have and/or will be developed for the following species in Table 11.1:

Table 11.1 Environmental Effects Monitoring Plans

EEMP	Component
Avifauna Protection and Environmental Effects Monitoring Plan	Generation
Aquatic Protection and Environmental Effects Monitoring Plan	Generation
Black Bear Protection and Environmental Effects Monitoring Plan	Generation
Caribou Protection and Environmental Effects Monitoring Plan	Generation
Furbearers Protection and Environmental Effects Monitoring Plan	Generation
Moose Protection and Environmental Effects Monitoring Plan	Generation
Methyl-Mercury Environmental Effects Monitoring Plan	Generation
Species at Risk Protection and Environmental Effects Monitoring Plan	Generation
Avifauna Species at Risk Impacts Mitigation and Monitoring Plan	Generation
Caribou Species at Risk Protection and Impacts Mitigation and Monitoring Plan	Generation
Ice Formation Environmental Effects Monitoring Plan	Generation

11.4.1 Innu Nation Environmental Management Committee

Structure and Mandate

Environmental management of the generation and transmission components of the LCP which are located in Labrador will be undertaken in part by an Environmental Management Committee (EMC), established under Chapter 5 of the Lower Churchill Innu Impacts and Benefits Agreement (IBA). The EMC will operate throughout LCP construction and five years into Project operations and will consist of four members – two members appointed by Innu Nation, two members appointed by Nalcor.

The mandate of the EMC is comprehensive and far-reaching and includes the maintenance and updating of environmental mitigation measures proposed by Nalcor during environmental assessment as well as any additional mitigation measures resulting from the issuance of permits, the review and evaluation of the Project's

environmental policies, environmental management systems and environmental monitoring programs. Other responsibilities include the development and recommendation of policies and measures to facilitate Innu access to the Project area and to protect Innu historic resources and the authority to make recommendations for additional mitigation, corrective action and improvement based on principles of sustainable development and adaptive management. However, the most significant role played by the EMC is in the review of draft permit applications and the environmental management system.

Permit Application Review Process

The EMC may review and make recommendations in respect of three categories of permits: significant permits in relation to generation, permits in relation to transmission lines located in Labrador, and permits associated with the decommissioning of the Project.

Under the process set out in the IBA, Nalcor will refer draft permit applications together with supporting documentation to the EMC at least 14 days prior to submission to the responsible regulator. The EMC will review the draft permit application and issue recommendations to Nalcor, with a copy to Innu Nation, within this time frame. In exceptional circumstances the review period may be adjusted.

Recommendations of the EMC will take the form either of a Consensus Recommendation (where all members of the EMC are in agreement) or a Report (where there are dissenting views among EMC members). If a Consensus Recommendation is issued, Nalcor must implement it unless there are valid and appropriate reasons not to do so. Should Nalcor refuse to implement a Consensus Recommendation, it must advise the EMC of its decision, together with a rationale, and where requested, meet with the committee to discuss. The requirements to provide reasons and to meet with the EMC will be suspended in the event of an unplanned critical situation. In such a case, Nalcor may take immediate action contrary to a Consensus Recommendation, but must notify the EMC of its actions and provide reasons as soon as possible after taking action.

The responsible regulator will be advised of the recommendations of the EMC and Nalcor's response at the time that the permit application is submitted to government and it is anticipated that advance consultation with Innu Nation through the EMC should accelerate government's consultation with Innu Nation prior to the issuance of a permit.

11.4.2 Permit Registry and Compliance Tracking

All Project regulatory requirements will be input into the Project's Compliance Tracking Registry (CTR), which will consist of the permit registry and construction management

registry in Aconex. Aconex will provide record for transmittal and status of permits throughout the process outlined in Figure 2.

The CTR will have two components, the Permit Register, which will keep a record of all permits, and a second component action registry used to track Project requirements that are not associated with specific permits, such as EA commitments.

To ensure that construction activity is not delayed because of permitting, it is imperative that appropriate controls be put into place. These controls will include the following:

- Project Schedule - Permit Register link: in order to highlight risks to the Project schedule associated with permitting, and to identify any permits on the critical path. Appropriate buffer periods to be included in the permit application and regulatory approval timeframes to account for unknowns, such as obtaining approval from the Innu Nation.
- Process steps will include such things as not allowing a requirement to be designated as "complete" without an accompanying "justification", and not allowing a "parent" requirement to be designated as "complete" if all of its "child" requirements are not "complete"; For example, numerous conditions of a permit may be considered as "child" requirements, and the permit itself the "parent". Accordingly, each of the conditions must be satisfied before the permit can be given the status of "complete".
- Security: Various levels of access rights will be assigned to specific users; and
- Audit trails: when changes are made to a specific requirement, whether it is the content of the requirement, the due date, responsible person, etc., Aconex will provide a record of the change and store it as metadata.

11.4.4 Permit Status Report

A permit status report will be issued on a monthly basis in the form of tabular output from the Aconex Permit Register. These reports shall be prepared by the *Permits Coordinator,* and submitted to the *ERC Lead or designate,* and the *Environmental Engineering Manager, Environmental Coordinators, On-Site Environmental Monitors, Project Component Managers* and HSEEP Manager, Muskrat Falls.

The Project's Document Control protocols will be used to manage this documentation and make it accessible to all relevant Project participants.

12 COMPLIANCE APPROACH / METHODOLOGY

The sections below detail the processes used to achieve environmental compliance with:

- Legislation (federal, provincial, and municipal) and permits (including EA Release conditions), and
- EA commitments.

12.1 PROCESS FOR IDENTIFYING RELEVANT LAWS AND REGULATIONS

Relevant legislation (federal, provincial, and municipal) and associated permits shall be identified by following the steps described below (as shown on Figure 12-1).

Step 1 Review Available Technical Information: The Environmental Engineering Coordinator reporting to the Environmental Engineering Manager, and in consultation with other members of the ERC Team, and the Contractor, as required, will review available technical information of direct relevance to each construction/procurement package. This information will initially consist of engineering design criteria, the package dictionary, the engineering work package plan (including package scope of work), and the contract package (including technical specifications and drawings).

Step 2 Identify Environmental, Resource and Land-Use Features: for each construction/procurement package, the GIS Specialist shall import geo-referenced site plans into ArcGIS, and will overlay all land-use, resource, and environmental features imported from the Constraints Mapping database and from other sources, as required. This will help identify specific land-use, resource, and environmental features that overlap onto the Project area associated with each construction/procurement package.

Step 3 Identify Construction Activities: The Environmental Engineering Coordinator will organize meetings to consult with appropriate PDT staff (e.g. , package engineer, construction manager, area manager, engineering manager, procurement, etc) and ERC Team representatives (e.g. Regulatory Compliance Lead and Permit coordinator, Scope Leaders, , etc). The intent is to discuss construction methods and activities, materials, work sequences, construction resources, work area boundaries, schedules, and potential environmental and regulatory constraints associated with each construction/procurement package so that all participants have an improved understanding of the construction activities, infrastructure, and environmental constraints/requirements.

Step 4 Identify Relevant Legislation, EA commitments and release conditions: The above steps will allow the Environmental Engineering Coordinator, with support from the Regulatory Compliance Lead, to identify all legislation, and EA commitments and release conditions, of relevance to each construction/procurement package. The ERC Lead shall be consulted, as required, to clarify specific aspects of the legislation and EA commitments.

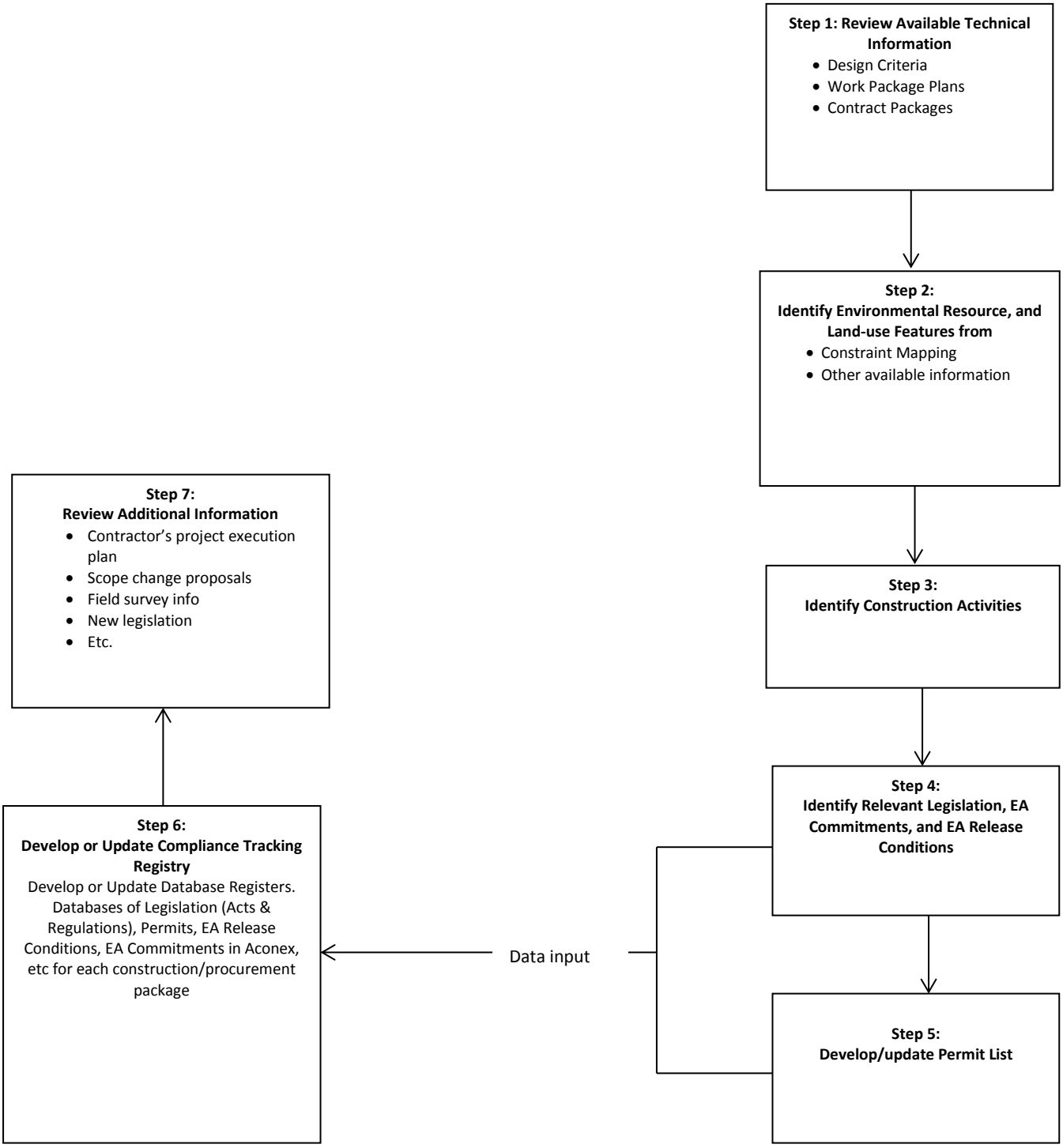
Step 5 Develop/Update Permit List: Based on the list of relevant legislation, the Permits Coordinator will develop a list of relevant permits for each construction/procurement package. Other members of the PDT shall provide support, as required. The regulatory compliance Lead shall be consulted, as required, to clarify specific aspects of the permits. The Contractor shall be responsible for compiling a list of its permits, or shall be consulted when required.

Step 6 Develop/Update Database Registers: The Permits Coordinator will enter permits, and permit conditions into the Permit Register using Aconex and Excel. EA Commitments and Conditions are tracked in the Action Registry as outlined in the EA Commitment Management Plan.

Step 7 Review Additional Information: as additional information becomes available (i.e. contractor's execution plan and permit list, scope change, field survey results, new legislation, etc), the Environmental Engineering Coordinators and Permits Coordinator shall obtain and review this new information. Other members of the ERC Team and the Contractor shall be consulted, as required.

If additional information has been received and reviewed, the Environmental Coordinator will coordinate another circuit of the process starting with Step 1 to ensure all regulatory requirements associated with the work have been identified and incorporated into the updated Permit Register. The list of laws, regulations, and permit types that have been compiled for the Project are provided in Appendix B.

Figure 12-1 Process for Identifying Relevant laws and Regulations



12.2 PROCESS FOR TIMELY SUBMISSION OF PERMIT APPLICATIONS

The ERC shall take the steps described below to ensure timely compliance with legislation, permits, and EA release conditions associated with each construction/procurement package for both permits obtained by the Owner (as shown on Figure 12-2).

12.2.1 Owner Permits

Step 1 Document Management: With the support of the PDT's Document Control Manager, Construction Manager, and other support staff, and in consultation with Environmental Engineering Coordinators, the Permits Coordinator shall organize and store in Aconex, all documents associated with permits and permit conditions. (Note: this step represents Step 6 of Section 12.1).

For example, all documents associated with a specific permit shall be stored in an Aconex subdirectory dedicated to that permit that contains:

- A completed permit application form (and all updated/revised forms) ;
- All correspondence regarding the application;
- Survey data and reports acquired for the purpose of completing the application;
- Analysis results required to complete the application;
- A copy of the permit, including all of its conditions; and
- All documents associated with permit closure.

Step 2 Permit Application Review: The Permits Coordinator shall transmit to the ERC Lead and the Environmental Engineering Manager, each permit application completed by the ERC, including all associated documents (i.e. the "application package") via Aconex. Other ERC staff shall provide support, as required, to compile the application package. Note that the properties group will carry out land acquisition and complete all permit applications required by Crown Lands. The crown lands application and approved permit will transmit and stored in Aconex and the Regulatory Compliance Lead will be aware of the permit conditions. The ERC Lead and Environmental Engineering Manager shall review the completed application package and advise of comments and revisions.

Step 3 Permit Subject to EMC Review: Permits relevant to EMC review are to be determined by the ERC Lead or designate. If submission to EMC is not required, the permitting process shall proceed to Step 8. If submission to EMC is required, the ERC Team shall proceed to Step 4.

Step 4 Submission to EMC: ERC team shall submit the application package to the EMC for review via Aconex.

Step 5 EMC Review: As described in Section 11.4.1, the Environmental Management Committee may review and make recommendations in the form of *Consensus Recommendations* or a *Report*, generally within 14 days of the EMC's receipt of the application package. The process shall proceed to either Step 6 or Step 8 depending on whether EMC recommends changes to the permit application. If EMC makes no recommendations to change the permit application package, then proceed to Step 8.

Step 6 Modify Application: In accordance with provisions of the IBA, the ERC Lead shall provide specific instruction to the Permits Coordinator on processing the permit application. Normally, these instructions shall be to modify the application in accordance with the EMC's *Consensus Recommendations*.

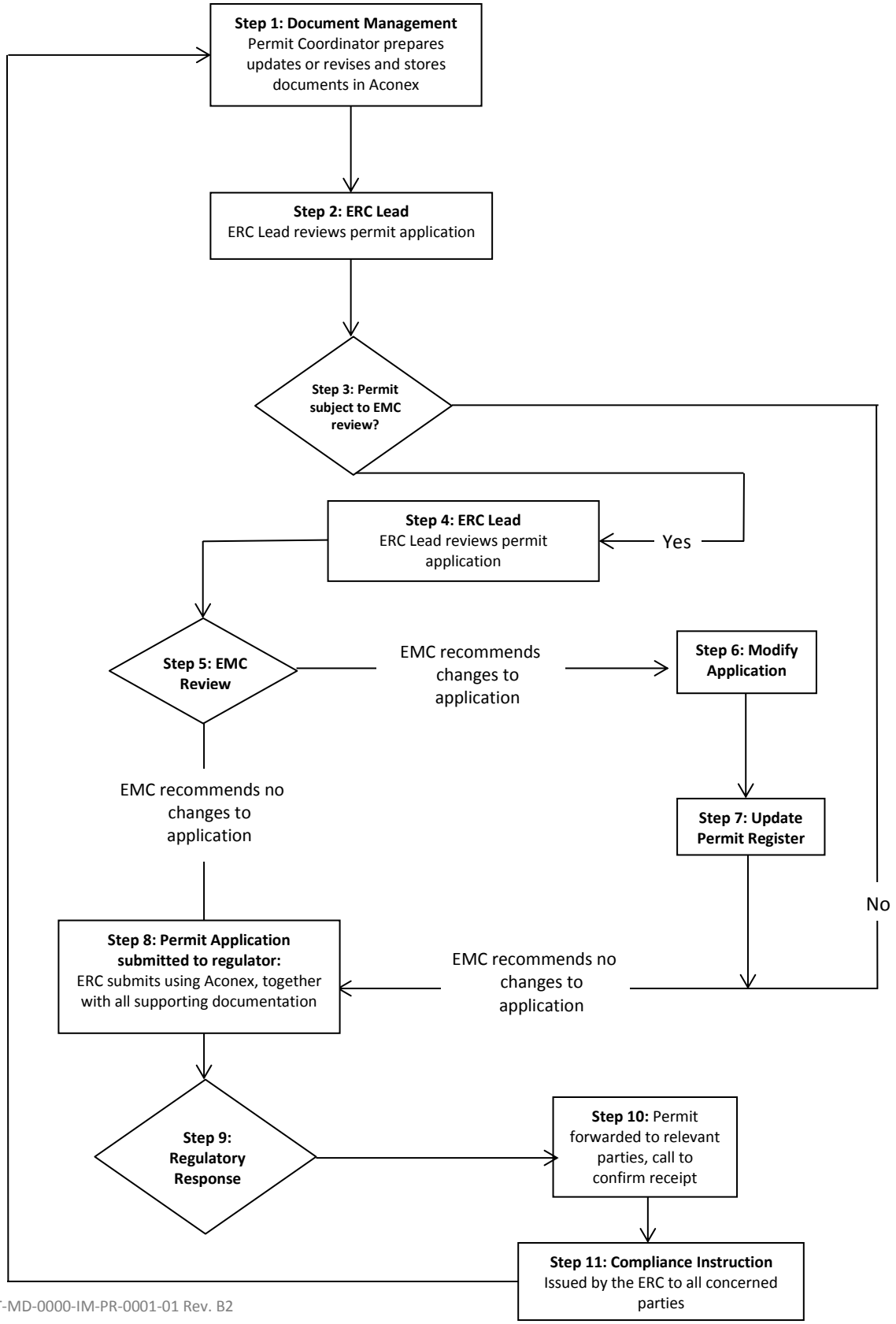
Step 7 Update Permit Register: the Permits Coordinator shall update the Permit Register, including links to updated documentation (e.g. modified permit application, EMC *Consensus Recommendations* or *Report*).

Step 8 Permit Application Package Submitted to Regulator: the ERC Lead shall submit permit application packages to the regulator via Aconex. Permit application packages shall be submitted to the regulator within two (2) days of receiving the permit application. The permit coordinator shall properly label each permit application package with the unique Permit Register tracking number. For all permits reviewed by EMC, the application package shall include EMC's recommendations (as per Steps 6 and 7). In the case where the EMC makes no recommendations for changing the application package, correspondence to that effect received from the EMC will also be included. Call/confirm the receipt of permit application, and if it is acceptable to the regulator.

Step 9 Regulatory Response: The regulatory agency shall forward its response (typically the completed permit, together with permit conditions) to the ERC Lead.

Step 10 Compliance Instructions: the Permits Coordinator shall issue Compliance Instructions to all concerned parties (the Contractor and/or the ERC Lead, the Construction Manager, Environmental Engineering Manager and Environmental Coordinator) within two (2) days of the ERC Lead receiving the regulator's response. These instructions shall state if the permit application is approved or rejected. If approved, the compliance instructions shall state all follow-up action that must be implemented to comply with the permit conditions. If rejected, the compliance instructions shall define what further steps are to be followed to ensure the Project schedule is not negatively affected.

Figure 12-2 Process for Owners Permit Application Submission



12.2.2 Contractor Permits

The Contractor and ERC shall take the steps described below to ensure timely compliance with legislation, permits, and EA release conditions associated with each construction/procurement package for both permits obtained by the Contractor (as shown on Figure 12-3).

Step 1 Document Management: The contractor is responsible for all documentation associated with application preparation.

Step 2 Permit Application Package Submitted to ERC: The Contractor shall submit permit application packages to the ERC Lead for review.

Step 3 Permit Subject to EMC Review: Permits to be reviewed by the EMC are to be determined by the ERC Lead or designate. If submission to EMC is not required, the permitting process shall proceed to the Regulator as per Step 6. If submission to EMC is required, the ERC Lead will conduct the submission as per Step 4.

Step 4 Submission to EMC: ERC team shall submit the application package to the EMC for review via Aconex.

Step 5 EMC Review: As described in Section 11.4.1, the Environmental Management Committee may review and make recommendations in the form of *Consensus Recommendations* or a *Report*, generally within 14 days of the EMC's receipt of the application package. If EMC makes no recommendations to change the permit application package, then proceed with submission.

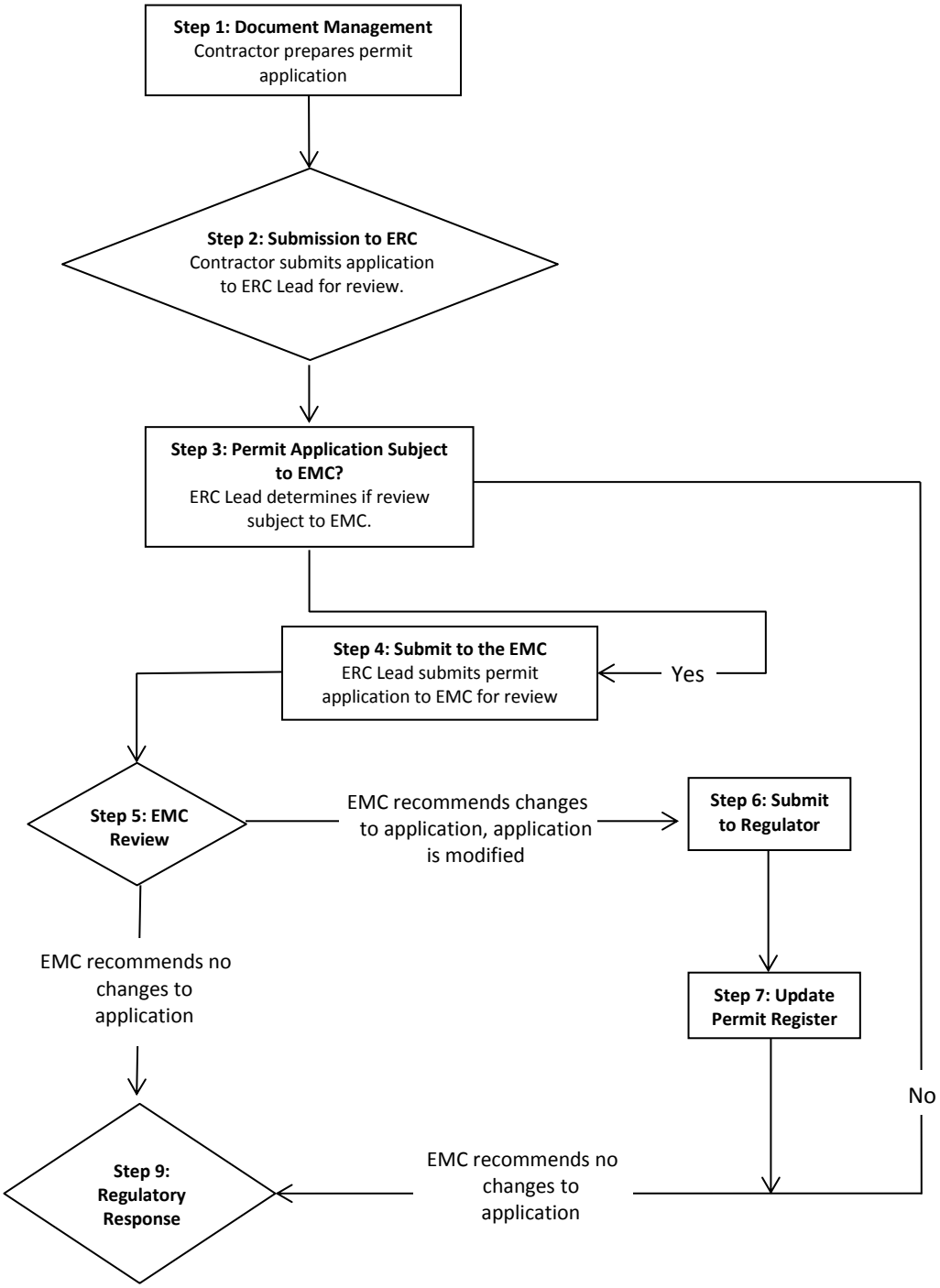
Step 6 Permit Application Package Submitted to Regulator: The ERC shall submit permit application packages to the Regulatory agency. For all relevant permits reviewed by EMC, the application package shall include EMC's recommendations (as per Steps 4 and 5). In the case where the EMC makes no recommendations for changing the application package, correspondence to that effect received from the EMC will also be included.

Step 7 Update Permit Register: the Permits Coordinator shall update the Permit Register, including links to updated documentation (e.g. modified permit application, EMC *Consensus Recommendations* or *Report*).

Step 8 Regulatory Response: The Contractor shall forward the regulatory response (typically the completed permit, together with permit conditions) to the ERC Lead.

It is the ERC Team's plan to ensure all required permits are secured well in advance of the start of construction and/or delivery of major procurement items (i.e. "supply-only items") to ensure the Project schedule is not negatively impacted. Therefore, the permits listed in Appendix B show timelines associated with permit processing. These timelines shall be entered into the Project schedule for all relevant permits. The permit application approval process described above shall be managed by the ERC Team working together with the contractors to ensure that all permits are secured before they are required for any associated construction activity, operation, or facility.

Figure 12-3 Process for Contractor Permit Application Submission



12.3 PROCESS FOR ENSURING COMPLIANCE

The Environmental Engineering Coordinators shall take the steps described below to ensure compliance (as shown on Figure 12-4).

Step 1 Review Activity: the Construction Manager, Environmental Engineering Coordinator, and the Contractor shall review the proposed activity 8 weeks before the planned start of the activity. For each construction/procurement contract, this review shall be carried out as part of the Kick-off meeting with the client before construction begins, and carried out each time before a new activity is started as part of the contract.

Step 2 Review of Contract: the Construction Manager and the Contractor shall evaluate the proposed activity against the contract's technical requirements (i.e. specifications, drawings, and approved scope change). If the proposed activity deviates from the contract, then proceed to Step 3; otherwise, proceed to Step 6.

Step 3 Scope Change: The Scope Change process shall be initiated, as described in Section 13.2 (Management of Change), by the Construction Manager and Interface Manager.

Step 4 Review of Relevant Legislation and Permits: The process described in Section 12.1 shall be followed to identify legislation and permits applicable to the proposed deviation.

Step 5 Secure Required Permits: The process described in Section 12.2 shall be followed to secure all required permits applicable to the proposed deviation.

Step 6 Review of Permit Conditions: the Construction Manager, with the support of the ERC Team as required, shall review with the Contractor environmental permit conditions applicable to the proposed activity. Conditions are tracked by the Permits Coordinator on the shared drive. Any variances shall be noted.

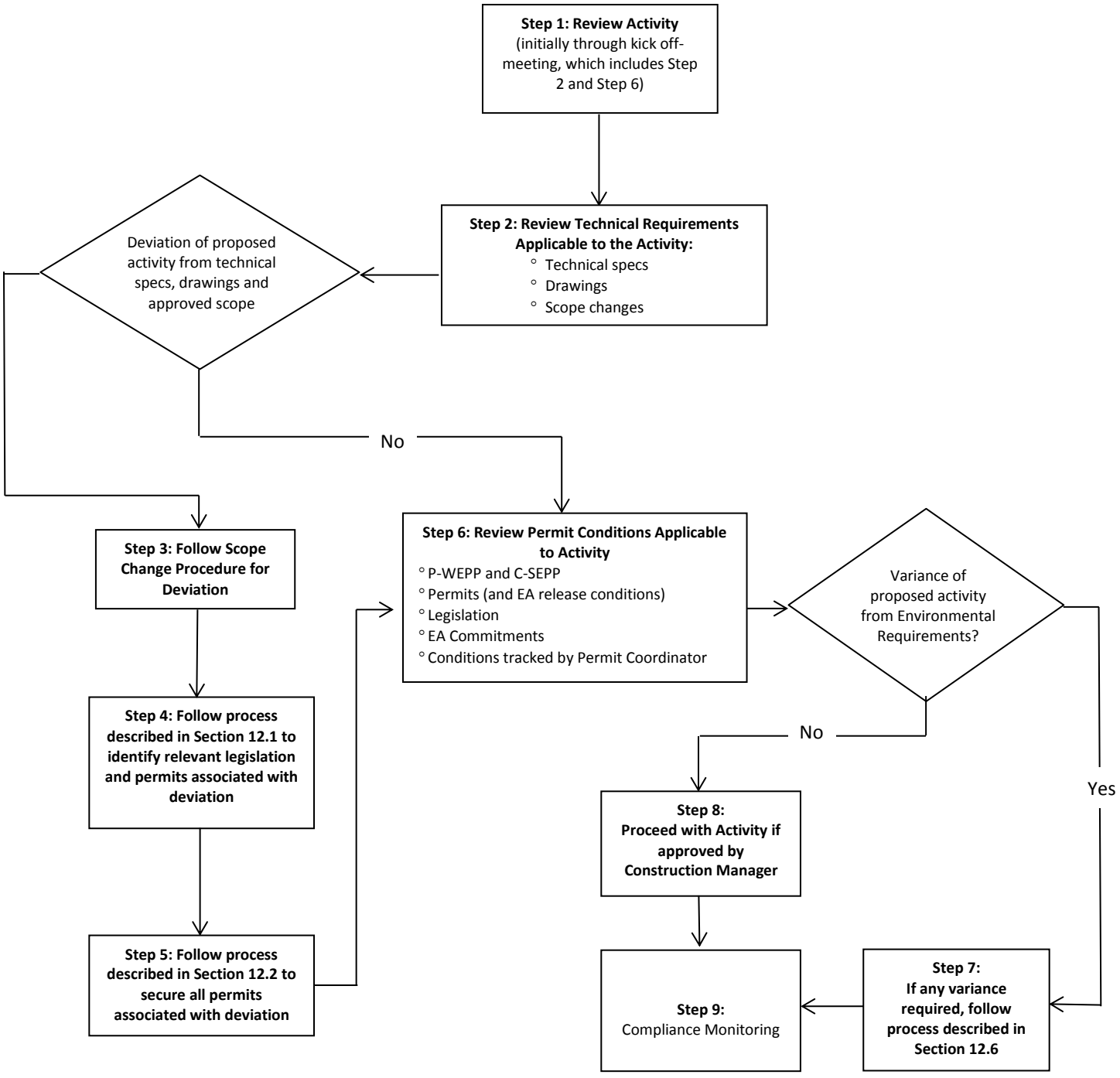
Step 7 Approval of Variances: The process described in Section 12.6 shall be followed to review and approve any variances applicable to the proposed activity.

Step 8 Proceed with Activity: If the proposed activity meets all identified legal requirements (e.g. new permits secured, variances approved, etc), the Construction Manager and Interface Manager shall provide final approval of the Scope Change. The Construction Manager shall issue Compliance Instructions to all concerned parties.

Step 9 Compliance Monitoring: the On-Site Environmental Monitors shall carry out on-going compliance monitoring to ensure that all environmental requirements are

followed, including Compliance Instructions issued by the Construction Manager. OSEM's shall also prepare and submit Compliance Instructions immediately to the Contractor, with copies to the Construction Manager and Environmental Coordinator, should any incident be discovered that does not comply with Project requirements.

Figure 12.4 Process for Ensuring Compliance



12.4 PROCESS TO IDENTIFY AND COMMUNICATE NEW LEGISLATION

The ERC Team shall take the steps described below to identify and communicate new legislation (as shown on Figure 12.5).

Step 1 Monitoring of Government Websites: the Environmental Engineering Manager, with the support of the Environmental Coordinators and Permits Coordinator, shall monitor government (federal and provincial) and Canadian Council of Ministers of the Environment (CCME) websites for any emerging environmental legislation and/or regulatory trends that may affect the Project. The Environmental Engineering Manager shall keep the ERC Team and the Contractor informed of such trends through monthly memos.

The Government of Newfoundland and Labrador's House of Assembly (legislation) website[2], will be regularly consulted, in particular the Progress of Bills website, to identify emerging, and proposed changes to existing, legislation. The Government of Canada's Justice Laws website[3] will also be regularly consulted to identify emerging, and proposed changes to existing, legislation. CCME's website[4] shall also be regularly consulted to identify emerging trends.

Step 2 Industry Association Membership: The ERC Team will maintain active membership in industry associations (e.g. Canadian Hydropower Association (CHA), Newfoundland and Labrador Environmental Industry Association (NEIA), etc) and the ERC Manager, Environmental Engineering Manager and Environmental Coordinators will regularly monitor their websites and participate in their functions with the view of keeping abreast of current and emerging trends in the legislation.

Step 3 Interface with Regulatory Agencies: The ERC Team shall interface with regulatory agencies to keep informed of new and emerging statutes, regulations, and permitting requirements that may affect the Project. The ERC Team shall keep the Contractor informed on relevant trends.

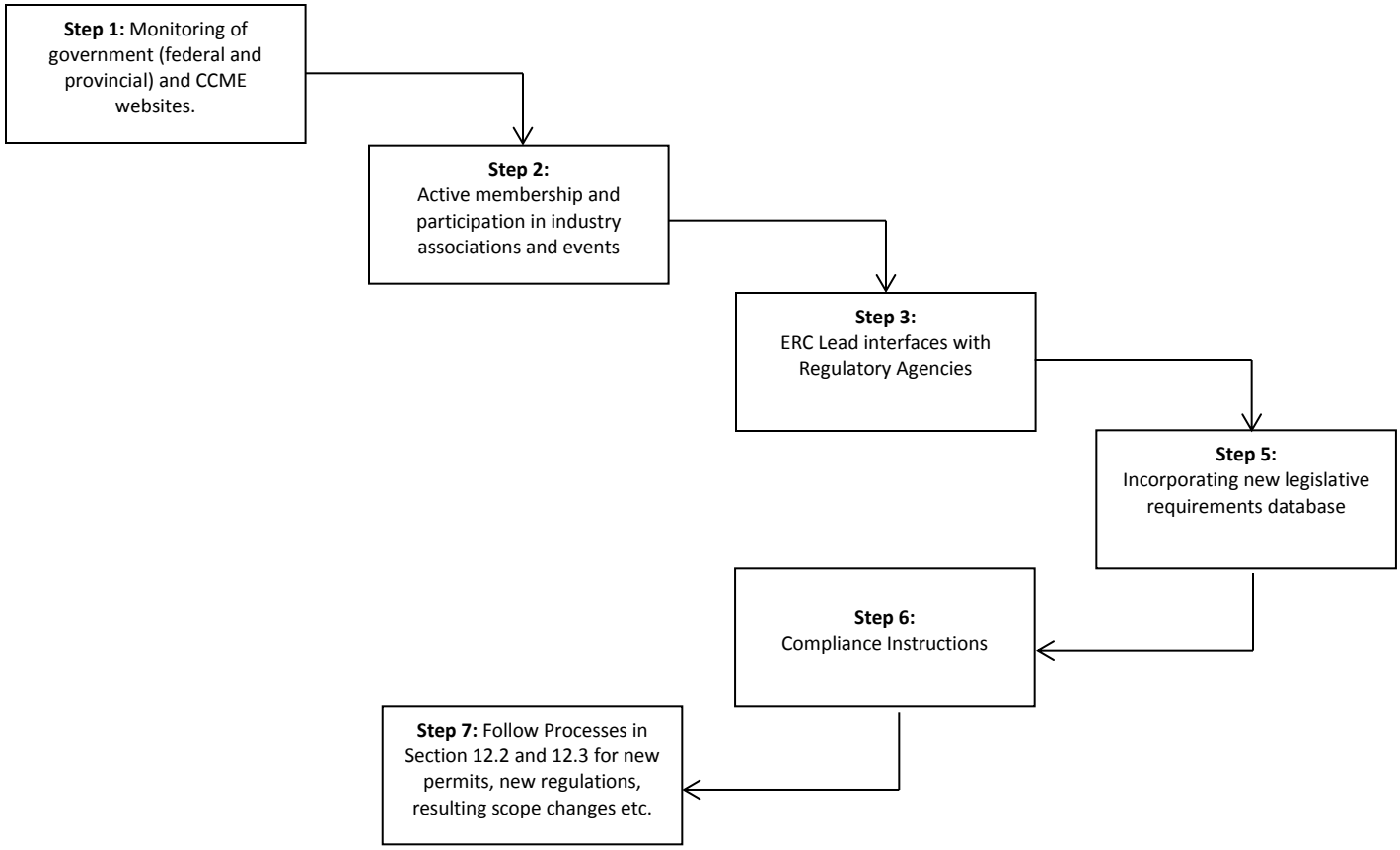
[2] http://www.assembly.nl.ca/legislation/default.htm
[3] http://laws-lois.justice.gc.ca/eng/
[4] http://www.ccme.ca/

Step 4 Incorporating New Legislation into the Permit Register: If new legislation comes into force that can affect the Project, the Permits Coordinator shall incorporate it into the Permit Register (as described in Section 12.1). These new laws will then be included with other relevant laws when evaluating new work and to assess and monitor ongoing site activities that may be affected.

Step 5 Compliance Instructions: the Environmental Coordinators shall issue compliance instructions to Project participants to advise of any actions needed to comply with the new legislation.

Step 6 Follow-up: Processes described in Sections 12.2 and 12.3 shall be followed to obtain all required permits and to ensure compliance with this new legislation.

Figure 12.5 Processes to Identify New Legislation



12.5 PROCESSES FOR ASSESSMENT AND EVALUATION

The ERC Team shall take the steps described below to assess and evaluate environmental performance (as shown on Figure 12-6).

Step 1 On-Site Environmental Monitoring: Under the direction of the Construction Manager, the OSEM shall inspect the Contractor's activities each day at each worksite. Activities shall be evaluated against environmental requirements defined in the:

a) technical specifications and drawings, the Project-Wide and Contract-Specific Environmental Protection Plans, and Compliance Instructions;
b) legislative requirements (including permit and EA release conditions); and
c) EA commitments.

The OSEM's shall periodically collect samples of various media (air, water, soil, effluent, etc.) and submit these for laboratory analyses, as required. Test results shall be compared against appropriate assessment criteria.

Brief field reports shall be prepared by the OSEM's on a daily basis and distributed to the Construction Manager and the Environmental Engineering Manager. The Environmental Engineering Manager will distribute the daily reports, as required. These reports shall describe the work being undertaken by the Contractor, document incidents of non-compliance with environmental requirements, Compliance Instructions issued, corrective action taken, and follow-up.

Step 2 Develop Audit Criteria: Based on review of daily field reports and Environmental Monitoring reports, Environmental Engineering Coordinators shall develop audit criteria, based on the environmental requirements of the Project. Support of other project staff with auditing experience shall be available, as required.

Step 3 Evaluation of an Activity: Environmental Engineering Coordinators (with the support of the Construction Manager, OSEM's and the Contractor) shall identify and evaluate specific activities where non-conformance with audit criteria has been previously observed during the course of daily site inspections. The Environmental Coordinator shall review documents, carry out a site visit, and interview selected Project participants involved with the activity being audited.

Step 4 Identification of Incidents of Non-Compliance: Environmental Engineering Coordinators shall document all incidents of non-compliance, any corrective action that was implemented and follow-up measures undertaken to confirm that corrective measures were effective. All non-compliances as well as opportunities for improvement will be entered into the Aconex Non-Conformance Register by Environmental Engineer

Coordinators. Each non-conformance will be transmitted to Nalcor via Aconex. Corrective action will be tracked by the OSEM and Environmental Coordinators and the non-conformance will be closed out once corrective action has been completed.

The Environmental Coordinator shall (with the support of the Construction Manager, OSEM's, and Contractor) also review the cause of the non-compliance and corrective action taken to confirm that appropriate corrective action has been implemented. Support of other SLI staff with auditing experience shall be available, as required.

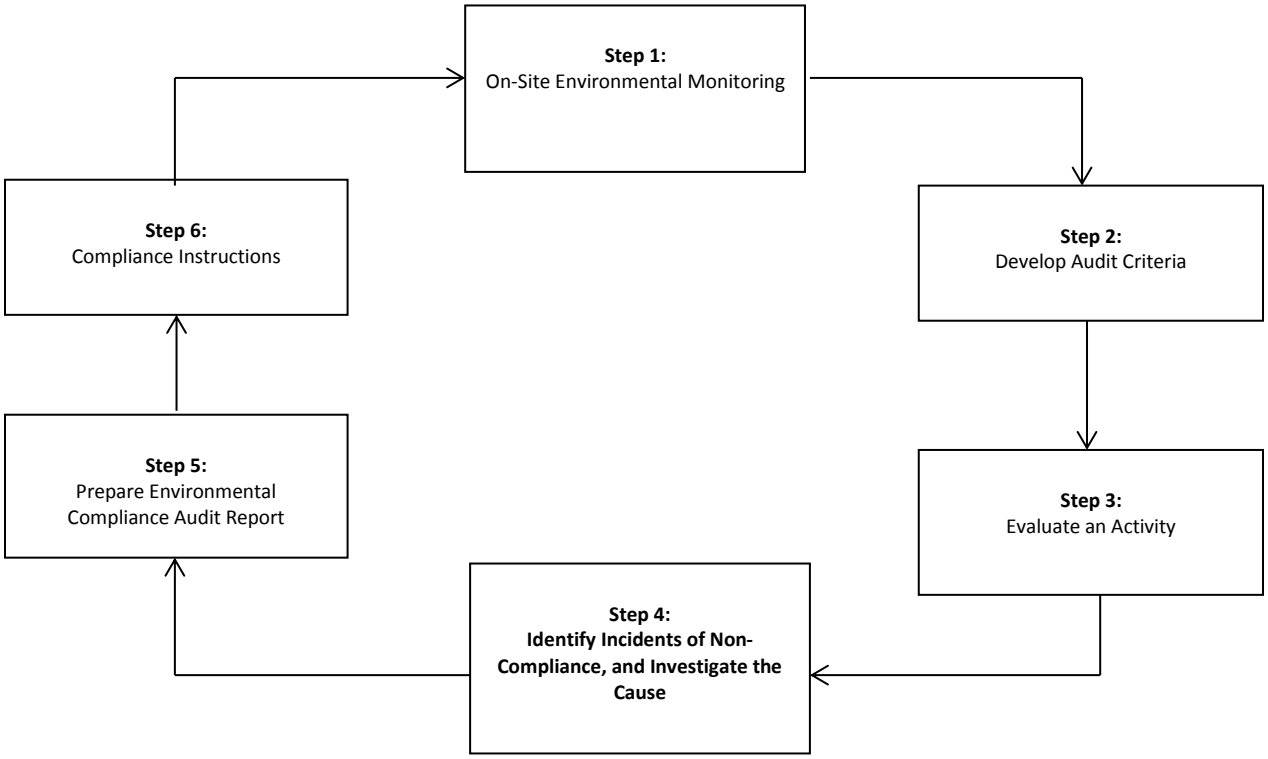
Step 5 Preparation of Compliance Audit Report: Environmental Coordinators, in consultation with the ERC Team and the Contractor, shall prepare *Environmental Compliance Audit Reports* (i.e. 1 audit report/quarter for the Hydro component, and 1 audit report/quarter for the Transmission Line-DC Specialties components). The reports shall document all identified incidents of non-compliance and their causes, corrective action taken, follow-up inspections, and close out. The Aconex non-conformances register will aid in completing the audit report. Environmental Coordinators shall distribute the *Environmental Compliance Audit Reports* to relevant Project participants.

Step 6 Compliance Instructions: Based on the audit reports, the Construction Manager shall prepare Compliance Instructions and provide these to all appropriate Project participants within two (2) days of receiving the compliance audit report. The compliance instructions shall:

a) Identify and describe each incident of non-compliance, including the cause, corrective actions, follow-up inspections, and close out;
b) Provide instruction on appropriate action required to anticipate and avoid similar incidents in the future.

Following receipt of these compliance instructions, OSEM's shall continue to monitor as before, but shall also ensure that the Compliance Instructions are implemented, in accordance with Section 12-3.

Figure 12.5 Processes for Assessment and Evaluation



12.6 PROCESS TO EVALUATE REGULATORY EQUIVALENCIES AND VARIATIONS

Step 1 Technical Review of Proposed Variance: Environmental Engineering Coordinator and Construction Manager, with support of the Permits Coordinator, and relevant engineering disciplines will review Contractor's proposed variance to evaluate whether it conforms to HSE, operations, and engineering requirements.

Step 2 Proposed Variance Rejected: The Contractor's proposed variance shall be rejected by the Construction Manager if it does not conform to the technical requirements. However, if it does conform, Step 3 shall be followed.

Step 3 Environmental Review of Proposed Variance: Environmental Engineering Coordinator will evaluate the proposed variance for equivalence with environmental requirements (i.e. P-WEPP, C-SEPP, legislation, permits (including EA release conditions), and EA commitments). The Environmental Coordinator will also review the regulation, if applicable, to determine if it allows for such a variance. To help in this evaluation, the ERC Team will request additional information from the Contractor and Project Delivery Team, if required. The Contractor's proposed variance shall be rejected if it is not allowed by the regulation or if the Environmental Engineering Coordinator judges it not to meet the Project's environmental requirements (Step 2).

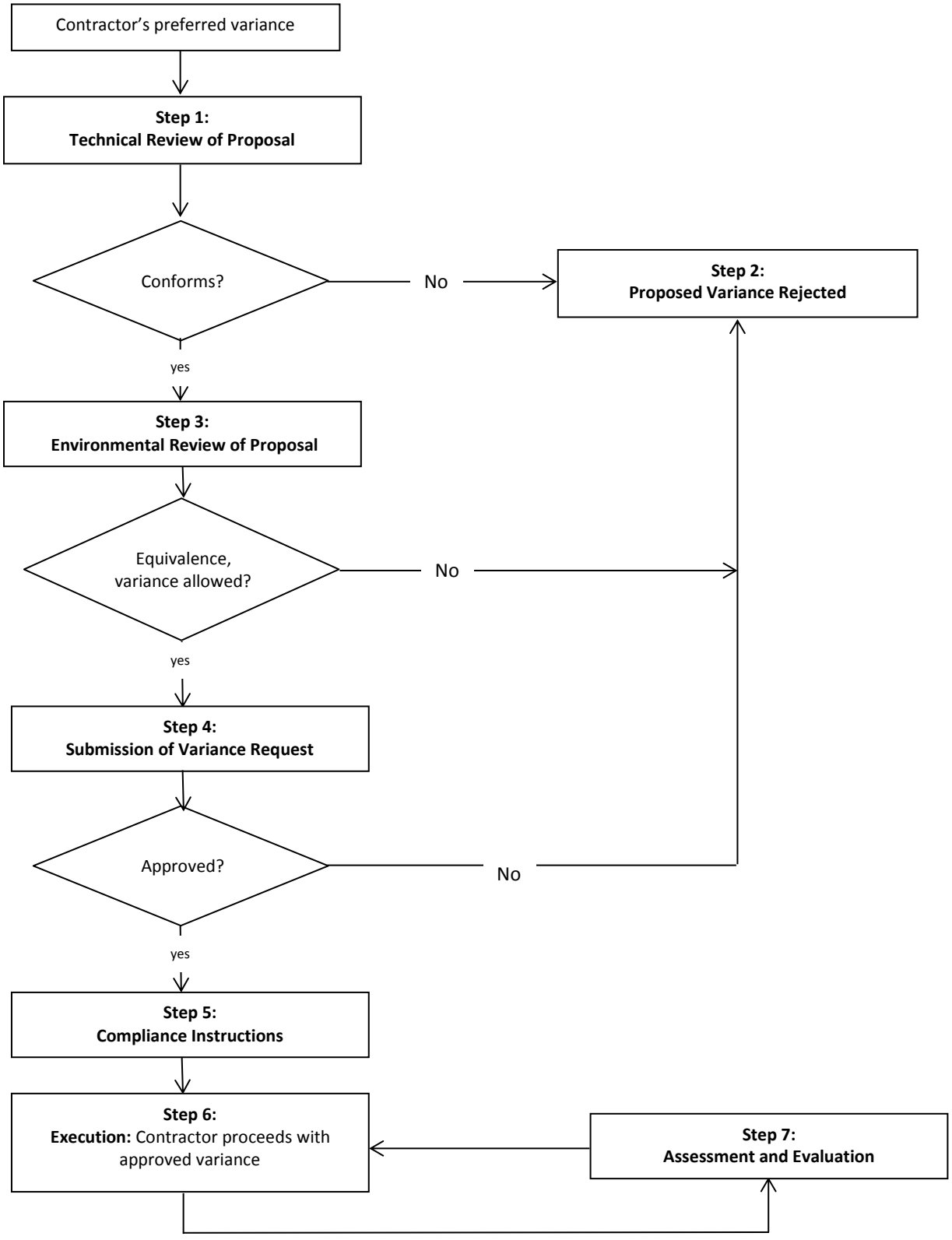
Step 4 Submission of Variance Request: The Environmental Engineering Coordinator will submit to the Regulatory Compliance Lead, the required documentation requesting a regulatory variance. The Regulatory Compliance Team shall follow the process for permit application approval described in section 12.2 for all variance requests.

Step 5 Compliance Instructions: Following response from the Project Delivery Team, the Construction Manager shall either approve the proposed variance or reject it, and shall inform the Contractor and all concerned parties. The Construction Manager shall provide compliance instructions in accordance with the process described in Section 12.3.

Step 6 Execution: The Contractor shall execute the approved variance in accordance with the compliance instructions.

Step 7 Assessment and Evaluation: The process described in Section 12.5 shall be followed to ensure the approved variance is implemented in accordance with the compliance instructions.

Figure 12.6 Processes to Evaluate Regulatory Equivalencies and Variances



13 ENVIRONMENTAL REGULATORY COMPLIANCE MANAGEMENT SYSTEM

The key deliverables of the Path 1 Compliance Management Process will be as follows:
Phase 3:

- Regulatory Compliance Plan (this document);
- A non-conformance register, updates as required;
- Permit Registry;
- Environmental Commitments Action Registry (Aconex);
- Minutes of regular compliance management review meetings;
- Completed Decision Gate 3 regulatory compliance sign-off:
- Updated CTR;
- Compliance management system reviews;
- A Compliance Tracking Registry and Record (Aconex), updated as required;
- Weekly compliance status reports; and
- Completed Decision Gate 4 regulatory compliance sign-off.

13.1 SYSTEM REVIEWS

As set out in the Project Quality Plan (LCP-PT-MD-0000-QA-PL-0001-01), periodic reviews of the environmental regulatory compliance management system will be carried out by the ERC Team. The purpose of these audits will be to evaluate the performance of the compliance management system and to identify opportunities for continual improvement.

13.2 TRAINING

Training and instruction are required to provide personnel a proper understanding of their duties and efficient use of the computer tools they need to employ. Training requirements need to be effectively communicated to the workforce prior to the start of the worker activity.

Training requirements will be defined in accordance to Legal, Client, and Stakeholder standards, policies and regulations, and will stipulate specific training for certain work activities, equipment and processes, and general training for most other activities encountered in the workplace.

13.3 MANAGEMENT OF CHANGE

All change that can potentially affect the Project's schedule, or indicated total cost, are to be managed in accordance with the Project Change Management Plan (document #LCP-SN-CD-0000-PM-PL-0004-B1; #505573-0000-31 RA-I-0001-00). However, while this process covers items that primarily impact the Project's cost and schedule, a complementary system shall manage day-to-day changes in the work that may require a new permit or regulatory requirement.

To identify these changes, evaluate relevant environmental and regulatory requirements, obtain required permits, and ensure compliance, the Project Delivery Team shall follow the procedures described in Section 12.

13.5 NON CONFORMANCE REGISTER

A non-conformance register will be created and updated in Aconex. All non-conformances identified during daily inspections, or from audits will be entered into the non-conformance registry. Any documentation associated with a non-conformance including daily reports, JEAs, incident reports, corrective action forms etc. will also be uploaded.

Corrective action will be tracked by the OSEM, OSEC and the Environmental Coordinator and once the corrective action is completed, the non-conformance will be closed out. Opportunities for improvement (including spill incidents) will also be tracked using the non-conformance register.

13.6 SOFTWARE SYSTEM

The software system to be used on the Project for storing and tracking environmental requirements is Aconex. The specific role it plays has been described in previous sections.

13.7 SYSTEM REVIEWS

As set out in the Project Quality Plan (LCP-SN-CD-0000-QA-PL-0001-01), periodic reviews of the Path 1 compliance management system will be carried out by the ERC Team, with the support of the Project Delivery Team Quality Manager. The purpose of these audits will be to evaluate the performance of the compliance management system and to identify opportunities for continual improvement.

B.0 ATTACHMENTS/APPENDICES

B.1 Federal Regulators and Applicable Acts, Regulations and Guidelines
B.2 List of Permits, Approvals and Authorizations

ATTACHMENT B.1: FEDERAL REGULATORS AND APPLICABLE ACTS, REGULATIONS AND GUIDELINES

Name of Legislation	Applicable Regulations	Responsible Department / Agency
Provincial – Newfoundland & Labrador		
Buildings Accessibility Act	Buildings Accessibility Regulations	Department of Government Services
Building Standards Act		Department of Government Services Department of Municipal Affairs
Dangerous Goods Transportation Act	Dangerous Goods Ticket Offences Regulations	Department of Environment and Conservation
	Dangerous Goods Transportation Regulations	
Endangered Species Act	Endangered Species List Regulations	Department of Environment and Conservation
	Species Status Advisory Committee Regulations	
Environmental Protection Act	Air Pollution Control Regulations 2004	Department of Environment and Conservation Department of Government Services
	Environmental Assessment Regulations 2003	
	Gasoline Volatility Control Regulations, 2003	
	Halocarbon Regulations	
	Heating Oil Storage Tank System Regulations, 2003	
	Pesticides Control Regulations, 2003	
	Storage and Handling of Gasoline and Associated Products Regulations, 2003	
	Storage of PCB Wastes Regulations, 2003	
	Used Oil Control Regulations	
	Waste Diversion Regulations	
	Waste Management Regulations	
	Waste Material Disposal Areas	
Fire Prevention Act, 1991	Fire Prevention Fire Extinguisher and Fixed Fire Extinguisher Systems Regulations	Department of Government Services Department of Municipal Affairs
	Fire Prevention Flammable and Combustible Liquids Regulations	
	Fire Prevention Regulations	
	Fire Prevention Smoke and Fire Alarm Regulations	
Food and Drug Act	Food Premises Regulations	Department of Government Services Department of Health and Community Services
Forestry Act	Cutting of Timber Regulations	Department of Natural Resources
	Directed Sale of Timber Regulations	
	Forest Fire Offence and Penalty Regulations	
	Forest Fire Regulations	
	Forest Fires Liability and Compensation Regulations	
	Timber Scaling Regulations	
Health and Community Services Act	Sanitation Regulations	Department of Government Services Department of Health and Community Services
Highway Traffic Act	Cargo Securement Regulations	Department of Government Services Department of Transportation and Works
Historic Resources Act	Archaeological Investigation Permit Regulations	Department of Tourism, Culture and Recreation
Lands Act		Department of Environment and Conservation

Name of Legislation	Applicable Regulations	Responsible Department / Agency
Mineral Act		Department of Natural Resources
Municipalities Act, 1999	Fire Chief Regulations	Department of Municipal Affairs
	Local Service District Regulations	
Occupational Health and Safety Act	Asbestos Abatement Regulations, 1998	Workplace Health, Safety and Compensation Commission
	Occupational Health and Safety First Aid Regulations	
	Occupational Health and Safety Regulations	
	Workplace Hazardous Materials Information System (WHMIS) Regulations	
Public Safety Act	Amusement Rides and Elevating Devices Regulations	Department of Government Services
	Boiler, Pressure Vessel and Compressed Gas Regulations	
	Electrical Regulations	
Quarry Materials Act, 1998	Quarry Materials Regulations	Department of Natural Resources
Radiation Health and Safety Act	Radiation Health and Safety Regulations	Workplace Health, Safety and Compensation Commission
Smoke-Free Environment Act, 2005	Smoke-Free Environment Regulations, 2005	Department of Government Services Department of Health and Community Services
Urban and Rural Planning Act, 2000	Development Control Regulations	Department of Government Services Department of Municipal Affairs
	Highway Sign Regulations, 1999	
	Occupancy and Maintenance Regulations	
Water Resources Act	Environmental Control Water and Sewage Regulations, 2003	Department of Environment and Conservation Department of Government Services
	Well Drilling Regulations, 2003	
Wild Life Act	Wild Life Regulations	Department of Environment and Conservation
Works, Services and Transporation Act	Building Near Highways Regulations, 1997	Department of Transportation and Works

Name of Legislation	Applicable Regulations	Responsible Department / Agency
Emergency "911" Act	Emergency "911" Act Definitions Regulations	Minister of Emergency Management
	Emergency 911 Cost Recovery Fee Regulations	
Endangered Species Act	Species-at-Risk List Regulations	Department of Natural Resources
Engineering Profession Act	By-laws of the Association of Professional Engineers	Department of Justice
Environment Act	Activities Designation Regulations	Department of Environment
	Air Quality Regulations	
	Approvals Procedure Regulations	
	Dangerous Goods Management Regulations	
	Emergency Spill Regulations	
	Environmental Assessment Regulations	
	Environment Act and Regulations Fees Regulations	
	Motive Fuel and Fuel Oil Approval Regulations	
	Nova Scotia Environmental Assessment Board Regulations	
	Nova Scotia Environmental Trust Regulations	
	On-site Sewage Disposal Systems Regulations	
	Ozone Layer Protection Regulations	
	Petroleum Management Regulations	
	Solid Waste-Resource Management Regulations	
	Sulphide Bearing Material Disposal Regulations	
	Used Oil Regulations	
	Water and Wastewater Facilities and Public Drinking Water Supplies Regulations	
	Well Construction Regulations	
Fatality Investigations Act	Fatality Investigations Regulations	Department of Justice
Fire Safety Act	Fire Safety Regulations	Department of Labour and Workforce Development
	Fuel Safety Regulations	
Forests Act	Forest Fire Protection Regulations	Department of Natural Resources
	Forest Sustainability Regulations	
	Wildlife Habitat and Watercourses Protection Regulations	
Health Protection Act	Food Safety Regulations	Department of Health Promotion and Protection
	Health Hazards Regulations	
	Industrial and Construction Camps Regulations	
	Occupational Health Regulations	
Land Registration Act	Land Registration Administration Regulations	Service Nova Scotia
	Land Registration General Regulations	
Land Surveyors Act	Land Surveyors Regulations	Department of Natural Resources
Motor Vehicle Act	Carriage of Freight by Vehicle Regulations	Service Nova Scotia
	Securing Loads on Vehicles Regulations	
	Slow-moving Vehicle Identification Regulations	

Name of Legislation	Applicable Regulations	Responsible Department / Agency
	Traffic Sign Regulations	
	Weights and Dimensions of Vehicles Regulations	
Occupational Health and Safety Act	Blasting Safety Regulations	Department of Labour and Workforce Development
	Fall Protection and Scaffolding Regulations	
	Occupational Diving Regulations	
	Occupational Health and Safety First Aid Regulations	
	Occupational Safety General Regulations	
	Temporary Workplace Traffic Control Regulations	
	Violence in the Workplace Regulations	
	Workplace Hazardous Materials Information System Regulations	
Public Highways Act	Advertising Signs Regulations	Department of Transportation and Infrastructure Renewal
Public Utilities Act / Utility and Review Board Act	Electric Utilities - Non-refundable Contributions	
	Electric Utilities - Uniform System of Accounts	
	Public Utilities Rules	
	Utility and Review Board Regulations	
Smoke-free Places Act	Smoke-free Places Regulations	Department of Health Promotion and Protection
Special Places Protection Act	Debert Archaeological Resource Impact Assessment Regulations	Department of Tourism, Culture and Heritage
Steam Boiler and Pressure Vessel Act	Steam Boiler and Pressure Vessel Regulations	Department of Labour and Workforce Development
Underground Hydrocarbons Storage Act	Underground Hydrocarbons Storage Regulations	Department of Energy
Weed Control Act	Weed Control Regulations	Department of Agriculture
Wildlife Act	Firearm and Bow Regulations	Department of Natural Resources
	General Wildlife Regulations	
Federal		
Canada Shipping Act	Ballast Water Control and Management Regulations	Environment Canada
	Classed Ships Inspection Regulations	Transport Canada
	Pollutant Discharge Reporting Regulations	
	Marine Machinery Regulations	
	Marine Personnel Regulations	
	Navigation Safety Regulations	
	Safe Working Practices Regulations	
	Vessel Certificates Regulations	
	Vessel Clearance Regulations	
Canada Transportation Act	Canadian Transportation Agency General Rules	Transport Canada
	Handling Carloads of Explosives on Railway Trackage Regulations	
Canada Water Act		Environment Canada
Canada Wildlife Act		Environment Canada
Canadian Environmental Assessment Act		Environment Canada

Name of Legislation	Applicable Regulations	Responsible Department / Agency
Canadian Environmental Protection Act	Disposal at Sea	Environment Canada
	Environmental Emergency	
	Interprovincial Movement of Hazardous Waste	
	Respecting Applications for Permits for Dispoal at Sea	
Coasting Trade Act		Canada Border Services Agency / Canadian Transportation Agency
Customs Act		Canada Border Services Agency
Explosives Act		Natural Resources Canada
Fisheries Act	Fish Health Protection Regulations	Environment Canada
	Newfoundland and Labrador Fisheries Regulations	Department of Fisheries and Oceans
Hazardous Products Act		
Immigration and Refugee Protection Act		Citizenship and Immigration Canada
Navigable Waters Protection Act	Navigable Waters Bridges Regulations	Environment Canada
	Navigable Waters Works Regulations	Transport Canada
Radiocommunications Act	Radiocommunication Regulations	Industry Canada
Species at Risk Act	SARA Regulations and Orders	Environment Canada
Transportation of Dangerous Goods Act	Transportation of Dangerous Goods Regulations	Transport Canada

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ATTACHMENT B.2: LIST OF PERMITS, APPROVALS AND AUTHORIZATIONS

Federal			
	Permit	**Act**	**Regulation**
1.	Release of Lower Churchill Hydroelectric Generation Project from Federal Environmental Assessment	Canadian Environmental Assessment Act	
2.	Operational Statement- Notification Form- Temporary Stream Crossing	Fisheries Act	
3.	Operational Statement- Notification Form- Clear Span Bridges	Fisheries Act	
4.	Operational Statement- Notification Form- High Pressure Directional Drilling	Fisheries Act	
5.	Operational Statement- Notification Form- Overhead Line Construction	Fisheries Act	
6.	Operational Statement- Notification Form- Punch and Bore Crossing	Fisheries Act	
7.	Operational Statement- Notification Form- Under Water Cables	Fisheries Act	
8.	Application for Authorization for Works Undertakings Affecting Fish Habitat –Assessment of Freshwater HADD	Section 35(2) of Fisheries Act	
9.	Request for Project Review	Fisheries Act	
10.	Explosives User Magazine License (Type U)	Explosives Act	
11.	Aeronautical Obstruction Clearance Form	Aeronautics Act	
12.	Nav Canada Land Use Division Review	Aeronautics Act	
13.	Application for License to Install and Operate a Radio Station in Canada	Radio Communications Act	
14.	Reporting Accidental Hazardous Materials Spills	Canada Shipping Act	
15.	Navigable Waters Protection Act	Navigable Waters Protection Act	
16.	Certificate for Commercial Building under National Building/Fire/Life Safety Code	National Fire Code of Canada	
17.	Permit to transport Dangerous Goods	Transport Canada	

Provincial			
	Permit	**Act**	**Regulation**
18.	Release of Lower Churchill Hydroelectric Generation Project from NL Environmental Assessment	Environmental Protection Act	Environmental Assessment Regulations
19.	Letter of advise to Assistant Deputy Minister on New Construction Project of Industrial Enterprises	Occupational Health and Safety Act	Occupational Health and Safety Regulations
20.	Certificate of Approval for Construction	Environmental Protection Act	Environmental Assessment Regulations
21.	Municipal Development Plan	Municipalities Act	
22.	Application for Crown Lands	NL Lands Act	
23.	Commercial Cutting/Operating Permit	Forestry Act	Cutting of Timber Regulations
24.	Permit to Burn	Forestry Act	
25.	Permit for Access of any Highway	Urban and Rural Planning Act	
26.	Signs, Highway Services, Fingerboard Signs, Approvals	Urban and Rural Planning Act	Highway Signs Regulations, 1999
27.	Asphalt Plant Construction and Operation Form	Environmental Protection Act	Environmental Assessment Regulations
		Water Resources Act	
28.	Application for a Quarry Permit	NL Quarry Materials Act 1998	NL Quarry Materials Regulations
29.	Application for a Subordinate Quarry Permit	NL Quarry Materials Act 1998	NL Quarry Materials Regulations
30.	Permit to Destroy Problem Animals	NL Wildlife Act	
31.	Bear Protection Permit	NL Wildlife Act	Wildlife Regulation 107
32.	Application for Water and Sewerage Works Permit	Water Resources Act	Environmental Control Water and Sewage Regulations, 2003
33.	Permit to Alter a Body of Water and Schedule A (Culverts)	Water Resources Act	
34.	Permit to Alter a Body of Water and Schedule B (Bridges)	Water Resources Act	
35.	Permit to Alter a Body of Water and Schedule C (Dams)	Water Resources Act	
36.	Permit to Alter a Body of Water and Schedule D (Fording)	Water Resources Act	

Provincial			
	Permit	**Act**	**Regulation**
			Devices Regulations
52.	Food Establishment License – Temporary Facility	NL Food and Drug Act	Food Premises Regulations
53.	Septic Systems Les than that 4546 litres/day flow	Water Resources Act	Environmental Control Water and Sewage Regulations, 2003
54.	National Building Code of Canada	NL Fire Prevention Act	
55.	Notice of Intent for Reservation of Shoreline	NL Lands Act	
56.	Temporary Food Establishment Inspection	NL Food and Drug Act	Food Premises Regulations

Municipal			
	Permit	**Act**	**Regulation**
57.	Municipal Development Plan		Local Municipal Regulations
58.	Building Construction Permits		Local Municipal Regulations
59.	Approval to Dispose Waste in Municipal Landfill		Local Municipal Regulations
60.	Building Occupancy Permit		Local Municipal Regulations