



Establish Hydroponic Production Facility for
Medical Marihuana

ENVIRONMENTAL REGISTRATION DOCUMENT

January 29, 2018

Government of Newfoundland and Labrador
Environment and Conservation
Pollution Prevention Division
4th Floor, Confederation Bldg., West
PO. Box 8700
St. John's NL, A1B 4J6

January 29, 2018

Re: Argentia Gold – Marihuana Production Facility

Please accept the following package to outline our proposal to build a 7,432 m² (80,000 sq foot) marihuana production facility in Argentia, NL. Argentia Gold has been working on this project for over 15 months and we feel confident in our ability to build and operate this facility.

We are ready to invest in the required local infrastructure to create production capacity in NL. We are planning on building and operating a state of the art facility that is fully compliant with all Federal, Provincial and Municipal regulations. Our facility will strictly control the supply chain in and out of the building. We do not foresee any environmental issues with respect to our facility. It is an organic operation that will be handling nutrients, cleaning supplies and plant material. The ACMPPR is a very comprehensive set of regulations that will guide us in the operation of our facility.

The above being said, it must be noted that we have the support of the local community. We are in the Argentia Industrial Park and will be running a very low risk operation.

I look forward to your reply,

Sincerely,



Mr. Andrew Colford
Executive Director

EXECUTIVE SUMMARY

Argentia Gold Corporation (AGC) proposes to be a leader in the medical marihuana market by operating a state-of-the-art production facilities designed and built specifically for the efficient production of high-quality, high-yield cannabis. Our highly capable and experienced team will position AGC to become a major industry provider in the distribution of marihuana products to a rapidly emerging consumer base.

Argentia Gold is completely self-financed, and no money is being raised or required from third parties. This document is meant to demonstrate that the applicant has a strategy and demonstrates an understanding of the business requirements to operate a medical marihuana facility under the strict conditions set forth in Government Regulations.

The company strategy is to have a phased approach to its development. Phase 1 will have a strict focus on the production of medical marihuana. Phase 2 will be focused on increasing our growing rooms and our production capability. Phase 3 will include research, product and market development. The business plan shows our intention to grow, process, sell and distribute dried marihuana for customers.

It is important to note that Argentia Gold intends to expand its facilities quickly once given approvals from Heath Canada on its application to become a Licensed Producer under the Access to Cannabis for Medical Purposes Regulations (ACMPR). Argentia Gold intends to build its vault to handle total production capacity of 4,180 m² (45,000 square feet). The company also has adjacent land available for future expansion if building capacity is exceeded

Name of Undertaking: Establish a Hydroponic Production Facility for Medical Marihuana.

Proponent:

(i) Name: Argentia Gold Corporation

(ii) Address: 702 Water Street
St. John's, NL A1E 1C1

(iii) Chief Executive Officer

Name: Mr. Adrian Maher
Official Title: Vice President
Address: 50 Pine Bud Avenue, St. John's, NL
Telephone No.: 709-763-4279

(iv) Principal Contact person for purposes of environmental assessment:

Name: Mr. Andrew Colford
Official Title: Executive Director
Address: 132 Logy Bay Road, St. John's, NL
Telephone No.: 709-689-1584

The Undertaking:

- (i) This is an undertaking to open and operate a federally licensed medical marihuana production facility.
- (ii) The purpose of this project is to build, commission and operate a marihuana production facility. There is estimated need for 100+ people required for the operation of this facility. Argentia Gold is positioning to be the first licensed producer in the Province.

Description of the undertaking:

- (i) Geographical Location: Our proposed site for this undertaking is at our facility at 12 Marquise Avenue in the Argentia Industrial Park in Placentia NL. This property is currently owed by the Proponent and is ideal for a production facility of this kind. See attached map and sketch of the building.
- (ii) Physical Features: This building is currently not used. It is an open building connected to the main water and sewer services of the Town of Placentia. The building is concrete construction.

(iii) Construction: The construction of this facility will be done by a separate entity. It is expected to be a \$15M construction project. It is a design build and once completed the developer will lease the facility to Argentia Gold for its operational purposes. The building is currently being refurbished after 10+ years of vacancy and limited occupancy. The following jobs will be required during the construction phase.

Occupation	NOC 2011	Full/Part-time	Length of Employment	# of Personnel	Contracted Out, or Direct Hire
Construction Phase (Dec – May)					
Lead Foreman	0721	Full-time	6 months	1	Contract
Electrician	7241	Full-time	6 months	15	Contract
Pipefitter	7203/7252	Full-time	6 months	15	Contract
Carpenter	7271	Full-time	6 months	5	Contract
Labourer	7611	Full-time	6 months	20	Contract

(iv) Operation: This operation will be commissioned by mid 2018 and will remain in production for the foreseeable future. There are no foreseen resource conflicts.

(v) Occupations: We will have a full complement of administration personnel as well as production, operations and sales and marketing. We will be guided by our HR policies and procedures for hiring and all employment equity guidelines, including our commitment to gender equity.

(vi) Project-Related Documents: Attached are some drawings and related information.

Approval of the Undertaking:

We require security clearance from the RCMP and Health Canada under the ACMPR. HC will issue two licenses (license to produce and license to sell). As well we require occupancy permits from the Town of Placentia and standard permitting and approvals from the Provincial Government.

We currently have the endorsement of the Town of Placentia, Local MP and MHA, Port of Argentia, RCMP, and Local Fire Department.

We did not anticipate an environmental registration of our project. We contacted the Department in July 2017 to notify them of our project. We are currently in final

design phase and procurement. We are scheduled to be completed construction in early 2018 and production by 3rd quarter 2018.

Introduction

Argentia Gold's medical marihuana facility is located 1 hour east of St. John's in the Town of Placentia in the Province of Newfoundland and Labrador. The building is situated on a 6-acre parcel of land in the Industrial Park at the Port of Argentia. The building is fully serviced industrial zoned land. The plan is to retrofit a 7,432 m² (80,000-square foot) existing concrete facility.

Current Status

Argentia Gold Corporation is privately owned company incorporated in the Province of Newfoundland and Labrador. The sole owner of the company and controlling shareholder is William Higgs.

Mr. Higgs is a Canadian citizen who has resided in the State of Florida in the United States of America for the past 40 years. He is self-made and financially secure and is using his personal finances to invest in the company.

Business Objective

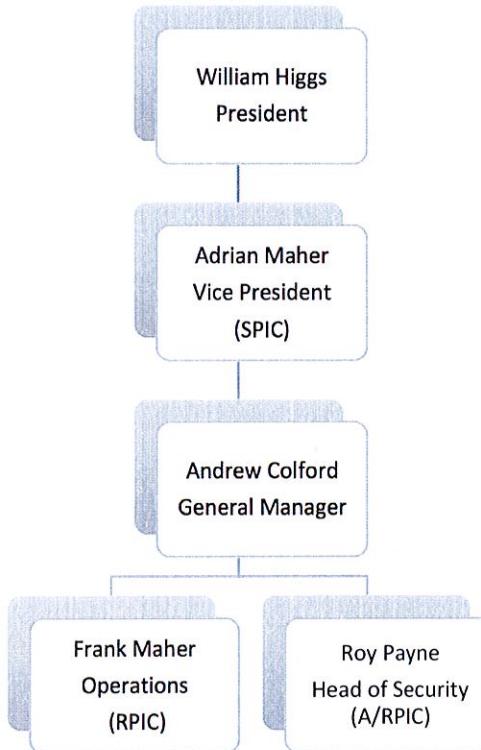
A unique advantage for Argentia Gold Corporation is its location. Located an hour outside of St. John's, Newfoundland Labrador in the Argentia Industrial Park, AGC has the potential to become one of the first licensed producers in the province and one of only a handful in the adjacent maritime provinces. The location provides for reasonably priced land in a designated business park which will allow for AGC to expand. AGC has already taken steps to accelerate growth by acquiring an option on an adjacent site in anticipation of expansion upon receiving the ACMPR License to Sell.

The company strategy is to have a phased approach to its development. Phase 1 will have a strict focus on the production of medical marihuana on the main floor of the facility. Phase 2 will be focused on increasing our growing rooms and our production capability utilizing the basement. Phase 3 will include a research and development (genetic and technology) and long-term product and market development. The plan shows our intention to grow, process, sell and distribute dried marihuana for customers. Our product will be sold according to the ACMPR and distributed by Canada Post.

Argentia Gold will assemble a solid team with well-seasoned management, operations, and key industry consultants. Once construction is complete and the facility enters the outfitting stage, AGC will commence its search for officers, managers, growers, trimmers and other labour. AGC will work with local colleges

and universities as well as host job fairs to fill out the required employee positions and commence SOP training.

Organizational Chart



Production Facility

The production facilities are designed with the invaluable input of growing technology and process experts, regulatory specialists, security professionals, architects and engineers. By taking advantage of innovations in design and technology, AGC will be able to provide consistent, high-volume production of industry-leading marihuana products from heavily secured facilities that uses every opportunity to capitalize on energy efficiencies.

AGC's facility is in Placentia, Newfoundland and has the endorsement of elected officials, police and fire department. AGC wishes to earn a reputation as a trusted corporate citizen by hiring local professional services, material suppliers, and labour.

From this facility, Argentia Gold Corporation will operate hermetically sealed, climate controlled, fully automated growing rooms totaling 3702 m² (39,850 square feet) of growing space. The facility will also include a mothering room

and an additional 3252 m² (35,000 square feet) to conduct processing, packaging, shipping, storage, and administration tasks.

The facility will be a Level 9 Security Area which will meet and exceed Health Canada's ACMPR requirements. AGC's security installation will include, but is not limited to, 60+ high definition zero light-capable tamper-proof surveillance cameras, monitoring and recording equipment, 30+ motion sensors, inner-ducting security measures, secure pick-up and loading zones, a double authentication high security vault, 45 proximity readers, high security reinforced doors with tamper proof bolting and electromagnetic locking systems, and 24/7 monitoring and on-site security personnel.

Most important to the quality and consistency of the product will be the implementation of a high-quality lighting system one which can replicate an ideal growing environment. Presently AGC is planning on employing a combination of HPS (high pressure sodium) and LED lighting.

The backbone to the efficient and secure operation is the seed to sale tracking and record keeping. AGC has retained Ample Organics to provide a complete and comprehensive package that includes plant tracking, bulk management, packaging, labelling, client database, e-commerce and order fulfillment.

Fire Safety:

For this undertaking, the amounts of flammable materials onsite will not pose a fire hazard. Our primary safety approach is to equip the building for fire prevention and ready means of personnel escape. We have engaged an Architect to guide our design to ensure the most up to date provincial fire regulations are considered and fire monitoring and extinguishing devices on site are appropriate for our particular process. The simple design of the building will allow for quick and safe exit in the unlikely event of a fire.

Water:

The facility will require at maximum production 5,000 gallons a day of water. Through recirculation and the town water supply the plant has sufficient water. Initial water samples indicate little or no water treatment is required.

Waste Water:

Discharge from the facility should be regular sewer, floor and storm water drains. Approved nutrient rich water and waste will be recirculated. We will adhere to the Environmental Control Water and Sewer Regulations, 2003.

All cannabis waste will be destroyed and disposed of in accordance with the ACMPR regulations.

Emissions/Ventilation:

Ventilation from the building will be monitored. There are no concerns with any emissions. All emissions will be monitored and will be compliant to ACMPR and Provincial standards. Inside odor and air quality will be monitored to ensure safe and clean air.

Air Quality Testing:

The quantities of any environmentally sensitive problems are extremely low. Although this undertaking is not near any potential receptors we intend to conduct air monitoring always.

Pesticides

No pesticides, unless brought in for a specific problem. Only pesticides ever brought into the facility will comply with Health Canada's strict guidelines surrounding pesticides storage and use. They can only be ones listed for approval according to the pest control regulations and at the concentration therein listed, potting materials; ground coconut core (this is organic material), cleaning agents: those approved for food processing facilities as can be found on CFIA's list of approved materials. (available on CFIA's web site)

Process Inputs

Seeds will be imported through an approved Health Canada facility.

Coconut Coir will be used for growing medium. It will be purchased from ISO 9000 registered supplier and product guaranteed clean by supplier.

Nutrients will be standard greenhouse grade water soluble nutrients. Calcium Nitrate, Potassium Nitrate, Magnesium Sulphate, Mono Potassium Phosphate as the main Macro Nutrients. And all the micro nutrients including but not limited to, Iron, copper, Zinc, Manganese, Boron, Zinc, Molybdenum (standard greenhouse water soluble nutrients)

Cleaning agent will be 1-part bleach + 9 parts water.

Other inputs include packaging material, latex gloves, hairnets, disposable coveralls, calibration gasses for CO₂ monitoring, liquid CO₂ (outside tanks), water filters, horticultural crop support nets, cables, packaging materials, etc.

Health, Safety, & Environment

Argentia Gold places utmost priority on the HSE aspects of its operations. Our safety program will be recognized within the PRIME program with Workplace Health, Safety and Compensation Commission (WHSCC) of Newfoundland and Labrador.

The personal safety and health of each employee of the company is of primary importance. The prevention of occupationally induced injuries and illnesses is of such consequences that it will be given priority over operating productivity where necessary. To the greatest degree possible, management will provide all mechanical and physical facilities required for personal safety and health in keeping with the highest standards.

Our company will ensure that contractors abide by appropriate rules and regulations. There is no task too important to ignore the importance of the health, safety and environment associated with our projects.

Quality Management System

Argentia Gold is committed to achieving the highest quality standards in an effort to meet client expectations. Our quality manual will be benchmarked to ISO 9001:2008 and as our company continues to grow so will our quality management systems.

Human Resource Considerations

We will require a minimum 40-50 people involved in production.

Occupation	NOC 2011	Full/Part-time	# of Personnel	Contracted Out, or Direct Hire
Farm Manager	8251	Full-time	1	Direct Hire
Manager (Horticulture)	0822	Full-time	2	Direct Hire
Nursey and Greenhouse Worker	8432	Full-time	20	Direct Hire
Agriculture Specialist	2123	Full-time	10	
Labourer	7611	Full-time	20	Direct Hire

Coordinates computed with reference to Monument No. 20233 using TOPCON GPS Station Receiver.

Station No. 21009
N 52°42'34.185" E 220°13'18.8"

Grid NORTH
N & S 1983

ARGENTIA INDUSTRIAL PARK
Lot No. 5
(Area "A" 2.604 Hectares)

ARGENTIA INDUSTRIAL PARK
Lot No. 4
Reg. No. 229383-153

ARGENTIA INDUSTRIAL PARK
Lot No. 5
Reg. No. 5218942-081

ARGENTIA INDUSTRIAL PARK
Lot No. 15
Reg. No. 560798-28

ARGENTIA INDUSTRIAL PARK
Lot No. 12
Reg. No. 520572-28

ARGENTIA INDUSTRIAL PARK
Lot No. 13
Reg. No. 67.908

ARGENTIA INDUSTRIAL PARK
Lot No. 14
Reg. No. 154

ARGENTIA INDUSTRIAL PARK
Lot No. 15
Reg. No. 5602401-18

ALANTRA LEASING INC.
Reg. No. 201625

PROVINCIAL READY MIX INC.
Reg. No. 763913

MAROUISE AVENUE
H5918372
79.074
H6508252
1018 = 201

COMMERCIAL BUILDING
Parking Lot
115.544
(Zonal Service)

Power Acc
320572-28
320572-28
320572-28

Grid NORTH
N & S 1983

ANDREWS AVENUE

NOTES

(1) Subject Parcel is part of lands described at Rob 1722 Frame 387 and Roll 2271 Frame 666 / Provincial Registry of Deeds
(2) Cautionary Notice : Any Sub-surface excavation work should be made with reference to U.S. Naval Drawings available at A.M.A. office.

LEGEND

② Standard Survey Data

Plan of Land Surveyed for

PLACENTIA BAY HOLDINGS INC.

(ARGENTA MANAGEMENT AUTHORITY INC.)

Argentia, Placentia Bay, Nfld.

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**Argentina
Gold**

500 meter radius





SECURITY FENCE PLACEMENT





June 7, 2017

Via E-Mail: andrew@easternservices.ca

Argentia Gold Corporation
P. O. Box 100
Argentia, NL
A0B 1W0

Re: Property Located at #12 Marquise Avenue

Dear Sir:

Further to your request for information relative to the property location of the former AMA offices located at the above referenced address, please be advised that this area is zoned **Industrial**. For your reference we have attached a copy of the permitted use as per the Town of Placentia Development Regulations.

At the public meeting held on May 16, 2017, Council agreed to **approval in principle** for medical marijuana production at this location in Argentia.

If you require any further information, please feel free to contact our office and every effort will be made to assist you.

Yours truly,

Charlotte M. Hickey
Chief Administrative Officer