DRAFT ENVIRONMENTAL IMPACT STATEMENT GUIDELINES

for

Lewisporte Biomedical Waste Incineration
Lewisporte, NL
Paul Dalley Holdings Inc.

REG No. 2316

October 23, 2024

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Glossary of Acronyms and Abbreviations

APCR	Air Pollution Control Regulations
BACT	Best Available Control Technology
COA	Certificate of Approval
DGSNL	Digital Government and Service NL
EIS	Environmental Impact Statement
GIS	Geographic Information System
NL	Newfoundland and Labrador
SI Units	International System of Units
VECs	Valued Environmental Components

SECTION 1 – BACKGROUND

Purpose of the Environmental Impact Statement (EIS)

The purpose of the EIS is to identify for all phases of the Project the important beneficial and adverse environmental effects associated with the Project. The EIS also identifies measures to mitigate adverse effects, to determine the significance of residual environmental effects, and to consult with Indigenous groups and the public and respond to their concerns. The environmental effects and mitigations associated with the Project may be subject to a comprehensive evaluation through the licensing and permitting processes and regulatory oversight of federal and provincial government departments/agencies and municipalities/towns. Information provided in the EIS shall not be considered redundant but rather shall be used to inform other regulatory processes.

Purpose of the Guidelines

On August 23, 2024, the Minister of the Department of Environment and Climate Change (the Minister) informed Paul Dalley Holdings Inc. (the Proponent) that an EIS is required for the proposed Lewisporte Biomedical Waste Incineration (the Project). The purpose of this document is to identify for the Proponent the nature, scope and extent of the information and analysis required in the preparation of the EIS. Section 3 of these guidelines outlines in detail the content of the EIS to be prepared. The EIS is a statement of the Proponent's environmental conclusions and commitments related to the Project and must be explicitly endorsed by the Proponent.

Proposed Project Description

The Proponent is proposing to construct and operate a biomedical waste incineration facility that would be located at 17 Roebotham Street in the Town of Lewisporte. The operation would include the collection of bio-medical waste generated on the island at NL Health Services facilities, transportation to the proposed incineration facility, and storage and treatment of biomedical waste on-site. The facility would dispose of approximately 450-500 tonnes of biomedical waste annually. The EIS shall describe all components and sites that are needed to make the Project operational and viable.

The Proponent previously made a submission to Newfoundland and Labrador (NL) Health Services in response to its published Request for Proposals for the construction and operation of a biomedical waste disposal/treatment facility.

SECTION 2 – PREPARATION AND PRESENTATION OF THE EIS

The EIS shall be written in terms understandable to the general public; however, where the complexity of the issues addressed requires the use of technical language, a glossary defining technical words and acronyms shall be included.

Where external sources of information or data are used, they shall be referenced within the body of the EIS and listed as References at the end. Where conclusions that are critical to the assessment of environmental effects are cited from other reports, the EIS shall provide sufficient detail of the original data and analysis to enable a critical review of that material and submit reference material as an appendix to the EIS. All conclusions regarding the receiving environment and predictions of the environmental effects shall be substantiated. The EIS shall reference, rather than repeat, information previously presented in other sections of the document. For clarity and ease of reference, the EIS shall include a Table of Concordance that cross-references the EIS guidelines so that information required by the guidelines is easily located in the EIS. A Table of Contents, providing a location of information in the final document by volume (if applicable), section, sub-section and page number, is required.

The EIS shall provide charts, diagrams, and maps wherever useful to clarify the text, including a depiction of how the developed Project sites will appear from both an aerial and terrestrial perspective. Where possible, maps shall use common scales to allow for comparison and overlay of mapped features and shall indicate common and accepted local place names. Geographic information shall be provided in standard Geographic Information System (GIS) mapping (digital) format, where feasible. The EIS and all associated reports and studies shall use the International System (SI) of Units of measure and terminology.

The EIS shall be a stand-alone document upon which a critical review can be undertaken. The Proponent shall explain and justify all methods used in the preparation of the EIS, including the use of scientific, engineering, Indigenous, local, and other knowledge. All hypotheses and assumptions shall be clearly identified and justified. All data collection methods, models, and studies shall be documented so that the analyses are transparent and reproducible. The degree of uncertainty, reliability, and sensitivity of models used to reach conclusions shall be indicated.

The EIS must address all requirements outlined in the Guidelines. Where the Proponent is of the opinion that the information is not required, the Proponent should contact the environmental assessment committee (EAC) to confirm the rationale for not including it, prior to submitting the EIS. The rationale for not including the information must also be provided in the EIS. The Proponent should identify in the EIS any changes made to the Project as originally proposed in the Registration document that may result in a different set of effects and may require a reconsideration of information requirements.

The information included in this document is not intended to be exhaustive - additional detail, studies, and/or examination of components may be required. The content of the EIS should be organized according to the format described in Section 3.

SECTION 3 - OUTLINE OF THE EIS

EXECUTIVE SUMMARY

The executive summary shall contain the following information:

- identification of the Proponent;
- a brief Project description;
- predicted biophysical environmental effects;
- socio-economic factors and potential effects;
- alternatives;
- mitigation measures;
- residual effects;
- follow-up and monitoring programs;

- all studies and plans required by the EIS guidelines;
- a summary of the fundamental conclusions of the EIS; and
- a glossary of terms.

The Table of Concordance may be included in the executive summary.

PLAIN LANGUAGE SUMMARY

The Proponent must prepare a stand-alone plain language summary of the EIS with a glossary of terms. The summary must contain sufficient detail for the reader to identify the Proponent and to understand the Project and its alternatives, and the potential environmental, health, social and economic effects. It should also provide sufficient detail to understand proposed mitigation measures and residual effects associated with the Project (in consideration of other existing and reasonably expected future projects in the vicinity of the Project site). Finally, the Plain Language Summary must include all studies and plans required by the EIS guidelines and a summary of the fundamental conclusions of the EIS.

PROJECT INFORMATION

1 INTRODUCTION

1.1 Name of the Undertaking

Lewisporte Biomedical Waste Incineration

1.2 The Proponent

This section shall introduce the Proponent by providing the following pertinent information:

a) name and contact information of the corporate body;
b) name and contact information of the chief executive officer;
c) principle contact person for environmental assessment, and contact information; and

d) key personnel responsible for preparing the EIS, and contact information;

This section shall include a description of the Proponent's experience/history of transport and disposal of biomedical waste through incineration and/or any other disposal methods, identifying any previous and current similar projects and their associated successes, failures and lessons learned.

1.3 Overview of the Undertaking

The intent of the overview is to identify the key Project components, rather than provide a detailed description of the Project, which will follow under section 2.0. The Proponent shall briefly summarize the Project by presenting the major Project components, associated activities, scheduling details, timing of each phase of the Project and other key features, including a detailed map of all Project components. If the development of the Project will follow a phased approach, information about the incremental and phased development of the Project, including the timing of each phase of the Project, shall be described. The key components of the undertaking shall include but not be limited to:

a) Construction of the project:
    i. access road, parking, fencing/security;
    ii. installation of the incinerator;
    iii. installation of utilities, including power, water and sewer lines; and
    iv. development of administrative and employee support facilities.
b) Operation and maintenance, including the following but not limited to:
    i. employee training and immunization;
    ii. collection, transportation and storage of biomedical waste;
    iii. waste segregation;
    iv. washing process;
    v. incineration process;
    vi. maintenance of the incinerator and equipment;
    vii. environmental monitoring (e.g., air quality, noise, wastewater, solid waste);
    viii. analysis of the wastewater composition and quality prior to discharge; and
    ix. analysis of the final composition of the incineration ash and the disposal of

ash and other by-products

c) Decommissioning and Rehabilitation:
    i. Decommissioning plan; and
    ii. Site restoration plan.

2 THE PROPOSED UNDERTAKING

2.1 Study Areas

The EIS shall contain a description of the geographical settings in which all components of the Project will take place. Aerial images and a precise description of the geographic boundaries of all proposed Project sites shall be provided, including, but not limited to, the following sites:

a) incinerator site, wash bay, access roads, parking, collection facilities and transportation routes, and waste storage including ash and other by-products;
b) storage facilities for hazardous materials including but not limited to biomedical waste, gas and liquid fuel;
c) power sources;
d) adjacent land use;
e) water sources and infrastructure to support the wash bay; and
f) wastewater disposal pipe, disposal route and discharge point.

A precise description of the geographic boundaries of the Project shall be presented in relation to the study area for each valued environmental component (VEC) (discussed in section 4.2). The boundary description shall be accompanied by the most recent maps/aerial imagery of appropriate scale (e.g. 1:30,000, 1:20,000, or other) showing the entire Project study areas, as well as illustrating the boundary of each study area with main structures and ancillary works. The delineation of the study areas is crucial to scope the extent of the environmental assessment. The rationale used to delineate the boundaries of the study areas shall be provided. This description shall focus on those aspects of the Project and its settings that are important in order to understand the potential environmental effects of the Project, and shall provide the following information:

a) Digital geospatial data of the Project study areas and the important environmental and socio-economic receptors, including, but not limited to, proximity of Project components to existing features, including but not limited to:
    i. institutional residences (hospital, convalescent home, seniors' home, personal care home or detention facility);
    ii. permanent residences (home, apartment building or condominium complex);
    iii. seasonal residences (seasonal cottage, tourist lodge, hotel, motel or hostel);
    iv. schools and daycares;
    v. food establishments and grocery stores;
    vi. commercial and industrial sites; and
    vii. sewer lines and outfalls;
b) description of the environmental significance and value of the geographical setting in which the Project is proposed to take place, and the surrounding area, including, but not limited to, the following:
    i. environmentally sensitive areas, such as parks and reserves;
    ii. wetlands, estuaries, brooks and rivers;
    iii. habitats of federally or provincially listed species at risk (if any);
    iv. tourist establishments and natural attractions; and
    v. traditional, cultural and recreational sites.

An overview map(s)/ image(s) shall be provided, noting the proximity of the study area to the above features.

2.2 Rationale for the Undertaking

The EIS shall describe the rationale for the Project in terms of its need and purpose, including, but not limited to, opportunities that the Project is intended to satisfy, as well as the current and future prospect of the Project (e.g., new technology and methodology for biomedical waste treatment /disposal, regulatory restriction, etc.). If the objectives of the Project are related to broader private or public sector policies, plans or programs, this

information shall also be included (e.g., provincial waste management strategy).

The need for the Project refers to a problem or opportunity that the proposed Project intends to solve or satisfy and establishes the fundamental justification or rationale for the Project. The purpose of the Project is defined as what is to be achieved by carrying out the Project. The need for and purpose of the Project should be established from the perspective of the Proponent and provide the context for the consideration of alternatives.

Provide details of the operation, including benefits and adverse effects, of this type of incineration technology currently in use in other jurisdictions in Canada.

2.3 Project Description

The Proponent shall describe the scope of the Project for which the EIS is being conducted including the construction, operation and maintenance, foreseeable modifications of all Project-related facilities, and the closure, decommissioning and rehabilitation of Project sites.

2.3.1 General Layout

The EIS shall provide a written and graphic description where applicable (e.g. maps, aerial imagery, site plan and drawings) of the following physical features of the undertaking:

a) project site including, but not limited to, the following:
    i. location of the incineration site;
    ii. access roads;
    iii. parking;
    iv. loading zone;
    v. wash bay;
    vi. incinerator;
    vii. water service line including diameter (noting that construction of a water service line diameter of 150 mm or greater in size will require a permit under the **Water Resources Act**;
    viii. sewer (wastewater) service line including diameter (noting that construction of a sewer service line diameter of 200 mm or greater in

size will require a permit under the **Water Resources Act**;

ix. office and employee facilities (e.g., lunch room, change room and washrooms);

x. maintenance shop, warehouse, electrical rooms, storage areas, administration offices, employee facilities;

xi. storage facilities for biomedical waste, gas, and liquid fuels;

xii. muster station;

xiii. fire hydrant; and

xiv. the geographic boundaries of the Project areas.

b) land use zoning and interactions with Project components for communities with Municipal Planning Areas, Municipal Plans, and Development Regulations legally in effect, including whether Project components are compliant with zoning.

Geographic Information System (GIS) files must be submitted for the physical features of the Project.

2.3.2 Construction

Construction activities (including permanent and temporary infrastructure related to physical features) shall be described, including, but not limited to, the following:

a) construction planning and tentative development schedule;

b) site preparation for the development, renovation and/or installation of

i. access road, parking, fencing/security;

ii. the existing building for the installation of the incinerator;

iii. the incinerator;

iv. loading zone;

v. water and sewer service lines;

vi. administrative and employee support rooms;

vii. fire prevention and alarm system;

viii. power and fuel sources (noting that storage and handling of gasoline and associated products require tank registration with the Government Service Centre);

c) description of facility construction materials;
d) sources, predicted decibel levels and duration of noise; and
e) all heavy equipment to be used during construction.

2.3.3 Operation and Maintenance

All aspects of the operation and maintenance procedures for the undertaking shall be described in this section of the EIS, including, but not limited to, the following:

a) details of each phase of operation (if the Project will be developed in phases);
b) employee immunization requirements (e.g., Tetanus and Hepatitis B) and training including how and when training would be provided;
c) collection and transportation of biomedical waste including, but not limited to, a description of the following:
    i. locations of waste collection in Newfoundland and Labrador;
    ii. waste collection process and transportation routes;
    iii. waste transport trucks, including type, size, capacity, covers, number of the trucks, and frequency of trucks arriving on site;
    iv. frequency of collection;
    v. waste collection containers/carts and transportation vehicles; and
    vi. wash bay, cleaning and disinfection of waste containers and vehicles.
d) incineration process including, but not limited to, a description of the following:
    i. waste receiving area, weighing station, segregation and expected waste composition;
    ii. loading/autoloader;
    iii. incinerator (continuous feed or batch);
    iv. name and model number of the incinerator;
    v. name and web address of the incinerator manufacturer;
    vi. internet links to the flier/brochure of the selected incinerator.
    vii. primary chamber, combustion time in the primary chamber, timeline (start-up through cool-down) for a complete cycle (in case of batch unit);
    viii. secondary chamber;
    ix. pollution control system (PCS) including cleaning and maintenance;

x. documentation demonstrating control efficiency of the PCS;
xi. heat exchange including the use of recovered heat;
xii. monitoring of stack emission and performance assurance;
xiii. collection of ash and other by-products;
xiv. waste flow including diagram;
xv. incinerator maintenance;
xvi. energy sources and auxiliary energy sources; and
xvii. efficiency and the safety of the incinerator.

e) monitoring of air emissions contaminants as per the NL Air Pollution Control Regulations, including particulate matter, total Volatile Organic Compounds (VOCs), Hydrogen Chloride (HCL), Hydrogen Fluoride (HF), Sulfur Dioxide (SO_2), Ammonia (NH_3), Carbon Monoxide (CO), Mercury (Hg), trace metals (e.g., Lead, Cadmium and Mercury), Dioxins and Furans;
f) sources and predicted decibels, duration, and geographic reach of noise;
g) chemicals (if any) to be used in operations;
h) proposed water source(s), estimated daily and annual volume of water quantity and water quality requirements;
i) characterization of wastewater effluent from the wash bay, estimation of annual volume of effluent discharge, description of treatment required for effluent to meet regulatory standards for discharge, and a description of the receiving environment for wastewater discharged;
j) procedures for regular source water and wastewater quality and quantity monitoring;
k) transport, storage, and use of all hazardous materials, fuels and lubricants required during operation and maintenance;
l) fuel use, including storage and amount of fuel use (per month);
m) sources and power requirements of the incinerator including the power source for all alternative options of the Project and sources of backup power;
n) details on how the equipment will be monitored on a daily, weekly, and monthly basis: opacity, oxygen levels, temperature air ports, ash pit sump, door seals, switches, heat recovery boiler tubes, blower intakes, burner flame rods and

sensors, heat recovery fan, lubricate hatches, hinges, control panels, and other equipment;

o) confirmatory test results demonstrating that the proposed incinerator meets the standards stated in the registration document and the Air Pollution Control Regulations under the **Environmental Protection Act**; and

p) site security and management of public access to the site.

2.3.4 Decommissioning and Rehabilitation

The EIS shall predict the lifespan of the undertaking and present an approach for decommissioning, which sets out a commitment from the Proponent to address:

a) expected useful life of major Project infrastructure and life cycle management plans for such infrastructure;

b) proposed decommissioning schedule and activities, including dismantling and removal of infrastructure and facilities and site decommissioning and rehabilitation for all disturbed areas; and

c) decommissioning and rehabilitation of fuel storage facilities associated with the Project.

The following plans covering all phases of the Project, including construction, operation and maintenance, and decommissioning and rehabilitation phases, shall be described in the EIS and may be referenced here and included as appendices (see section 7 of the EIS Guidelines):

i. Emergency Response/Contingency Plan;
ii. Waste Management Plan;
iii. Wastewater Management Plan; and
iv. Public Consultation Plan.

In addition, a Site Decommissioning and Rehabilitation Plan should be included that would be followed after the termination of the facility. The plan should include at a minimum, but not limited to the following aspects and may be referenced here and included as appendices (see section 7 of the EIS Guidelines):

i. Emergency response;
ii. Demolition of buildings/structures (if any);
iii. Waste management and disposal; and
iv. Regulatory requirements (e.g., permits and approvals)

2.3.5 Regulatory Framework and Government Oversight

The EIS shall provide a comprehensive list of permits and regulatory approvals (municipal, provincial, and federal) required for all phases of the undertaking, including construction, operations and maintenance, and decommissioning and rehabilitation. The list shall include, but not be limited to, the following details:

a) activity requiring regulatory approval;
b) name of permit, license or regulatory approval;
c) name of legislation applicable in each case; and
d) regulatory agency responsible for each permit, license, and approval.

The EIS shall identify:

a) government policies, resource management plans, and planning or study initiatives pertinent to the Project and/or the environmental assessment;
b) regulations, codes, standards, guidelines and best industry practices applicable to biomedical waste disposal projects. In cases where the Project is outside the scope of adopted codes/standards, the EIS shall identify the requirements that will maintain an equivalent level of safety;
c) established and evolving developments in biomedical waste disposal and transportation codes and standards;
d) municipal or provincial land use plans, land zoning, community plans, protected road zoning plans and regulations, whether the Project conforms to those plans and actions to be taken to mitigate non-conformity, if applicable;
e) regional, provincial, and/or national objectives, standards, codes and/or guidelines that have been used by the Proponent to assist in the development of the EIS; and
f) any governmental or non-governmental working groups or committees that provide guidance to municipal and or provincial bodies with respect to land use, and

ecological and recreational stewardship in the Project area.

The EIS shall evaluate whether the Project meets the published reporting requirements of the National Pollutant Release Inventory (NPRI). The NPRI can be accessed at https://www.canada.ca/en/environment-climate-change/services/national-pollutant-release-inventory/report.html.

3 ALTERNATIVES

3.1 Alternatives to the Undertaking (Incineration)

The EIS shall include a detailed analysis of the advantages and disadvantages to the environment of the undertaking as proposed; an analysis of the alternatives to the incineration for biomedical waste disposal; and a summary with clearly described methods and sufficient information to justify the selection of the preferred alternative, as well as an explanation for rejecting other alternatives. This section shall include a comparative analysis of the environmental effects and technical and economic feasibility of alternatives that led to the selected Project alternative. The Proponent shall consider describing:

a) functionally different methods of meeting the Project need and achieving the Project purpose; and
b) market and regulatory circumstances that may have influenced the preferred alternative.

3.2 Alternative Methods of Carrying Out the Undertaking

The EIS shall identify and consider the environmental effects of alternative methods of carrying out the undertaking that satisfy the need for the undertaking. The preferred alternatives shall be identified with the selection based on clearly described methods. An explanation shall be included of how environmental factors affect the design and consideration of alternatives.

The EIS shall provide the rationale for selecting Project components and shall discuss the state of the art of the various technologies being proposed. The EIS shall indicate

known experience with, and effectiveness and reliability of the equipment, techniques, procedures, and policies, for each alternative, particularly under climate conditions in Newfoundland and Labrador and elsewhere, and their relation to best practice in Newfoundland and Labrador.

The EIS shall analyze and compare the design alternatives for the Project in relation to their environmental and social costs and benefits, including those alternatives which cost more to build and/or operate but which cause less harmful environmental effects. The discussion should consider the following potential alternatives to incineration of biomedical waste:

- Thermal treatment, such as microwave technologies;
- Steam sterilization, such as autoclaving;
- Electrolysis; and
- Chemical mechanical systems.

The range of alternatives considered for biomedical waste disposal and the scale of the operation shall be discussed, and the chosen alternative justified. In describing alternative means of carrying out the Project, the Proponent should consider, but not be limited to, a discussion of the following:

a) Odor, air emission and air quality;
b) Process plant sizes and types;
c) Waste collection and transport;
d) Water source(s) and wastewater disposal for the Project; and
e) Order and timelines for construction and operation phases.

3.3 Alternative Locations for Carrying Out the Undertaking

The EIS shall identify and consider alternative locations for carrying out the undertaking. In describing alternative locations for carrying out the Project, the Proponent may consider, but not be limited to, a discussion of the following:

a) Land area requirements, routes to transport collected waste to incineration facility, and proximity to sensitive receptors

b) Rationale for selecting the preferred site;
c) Identification of municipality(ies) if alternative site(s) located within a municipal jurisdiction, geographic locations if outside municipal boundaries;
d) Water source(s) and wastewater disposal for the Project;
e) Approved waste disposal sites for by-products (e.g. ash); and
f) Current land use, land cover; and ownership.

4 ENVIRONMENT

4.1 Key Issues

To better focus the EIS, the Proponent shall identify the key issues related to the Project. The issues can be revised and adjusted in relation to the information acquired in the field and during consultations held by the Proponent in the preparation of the EIS.

The following factors shall be included in the selection of key issues:

- air emissions and odor;
- accidental spill/release of biomedical waste;
- distances to nearest receptors;
- communities, human health and quality of life;
- economy, employment and business;
- local tourism, heritage and cultural resources;
- waste disposal and wastewater/effluent discharge;
- water resources, including brook and harbour;
- water supply and sewer system;
- community consultation.

The ensuing sections should focus on the components relevant to the key issues and effects of the Project.

4.2 Reference Conditions in the Existing Environment

The focused EIS shall describe relevant aspects of the existing environment prior to

implementation of the Project, which constitutes the reference state of the environment. Baseline studies are not required to inform the assessment of the effects of the Project, which is proposed in an industrialized brownfield site within a municipality. Using qualitative and quantitative surveys (where applicable), this section shall include a description of the existing bio-physical and socio-economic environment that will be affected or might reasonably be expected to be affected, directly or indirectly, by the undertaking with emphasis on the Valued Environmental Components (VCs). If the information available from the government or other agencies is insufficient or no longer representative, the EIS shall complete the description of the environment by conducting original surveys and research according to generally accepted practices and local knowledge. The EIS shall provide the information required to understand or interpret collected data (e.g. methods, survey dates and times, weather conditions, location of sampling stations). The methods used should be sufficient for the purposes of identifying and assessing the environmental effects. The level of detail shall be sufficient to:

- identify and assess any adverse environmental effects that may be caused by the Project;
- develop mitigation measures and follow-up monitoring programs where appropriate;
- identify and characterize the beneficial effects of the Project; and
- provide the data necessary to enable effective follow-up.

The EIS shall identify the important environmental and socio-economic receptors in the vicinity of the project area that may be adversely affected by the Project and include the distance of the receptors in meters (m) from the project boundary.

A description of the existing environment shall be developed for the Project and each alternative, drawing specific reference to the VCs. Detailed descriptions shall be developed for the following:

- Atmospheric environment;
- Aquatic environment;
- Terrestrial environment;
- Land and resource use;

- Communities;
- Economy, employment and business; and
- Tourism, heritage and cultural resources.

VECs for each environmental component shall be described.

4.2.1 Atmospheric Environment

The EIS shall describe reference conditions in the existing atmospheric environment to inform the analysis of the effects of the Project on human health and safety, ecological health, and sensitive human and wildlife receptors. The EIS shall describe the relevant components of the atmospheric environment within the study area of the VECs, including, but not limited to, the following:

a) Climate information, including monthly and annual minimum, maximum and mean values for precipitation and temperature, prevailing wind speed and direction, and storm events;
b) Ambient noise conditions at the Project site, including baseline ambient noise surveys. Information on typical sound sources, decibel levels, geographic extent and temporal variations shall be included;
c) Ambient air quality conditions in the vicinity of the Project, including air emission sources, dust lift-off (e.g., diesel generators, heavy equipment, gravel roads, etc.) and the presence of any pleasant or unpleasant odor and sources. The EIS shall compare observed air quality to acceptable standards and shall consider the effects of air quality on nearby human and wildlife receptors.

4.2.2 Aquatic Environment

The EIS shall describe the relevant components of the aquatic environment within the study area of the VECs, including, but not limited to, the following:

a) Water supply availability and use (note that the Government Service Centre requires that the facility cannot be occupied before it is connected to the municipality's water supply and sewage disposal system);
b) Surface (e.g., Southwest Book, Lewisporte Harbour) and groundwater (e.g., well) resources and locations, including identification of those resources planned to

supply the incinerator and all infrastructure;

4.2.3 Terrestrial Environment

The EIS shall describe the relevant components of wetlands and the terrestrial environment within the study area of the VECs, including, but not limited to, the following:

a) Ecological land classifications;
b) Terrestrial flora and fauna;
c) Geology (bedrock and surficial);
d) Avifauna, including migratory birds protected by the **Migratory Birds Convention Act** (landbirds, and waterfowl) and species under provincial jurisdiction including raptors and upland game birds;
e) Species at risk and Species of conservation concern and their habitats;
f) Protected areas, conservation agreement lands and habitat enhancement projects (e.g., Southwest Brook estuary bird sanctuary); and
g) Human-wildlife interactions.

4.2.4 Land and Resource Use

The EIS shall describe relevant land and resource use within the study area of the VECs, including, but not limited to, the following:

a) Current and historic land use of the project site;
b) Tourism operators, cottages, multi-use trails, and recreational activities (e.g. trails, fishing, swimming, berry picking, etc.);
c) Unique sites (e.g., scenic lookouts);
d) Municipalities, municipal plans and development regulations; and
e) Land tenure, including, but not limited to, the following:
    i. Crown lands;
    ii. Private land ownership;

4.2.5 Communities

The EIS shall describe relevant community elements, in jurisdictions with and without municipal plans and development regulations, including the following:

a) Population demographics and health status, including physical, mental, and social

well-being;

b) Recreation;
c) Education;
d) Housing, accommodations, and property values;
e) Fire and emergency services;
f) Health care services including mental health and addiction services, social programs, and other community services;
g) Active municipal, governmental or non-governmental working groups or committees; and
h) Municipal infrastructure or services to be used by the Project and the capacity of the infrastructure and services to support the Project, including human resources, equipment and training.

4.2.6 Economy, Employment and Business

The EIS shall describe the relevant economy, employment and business elements in the study area of the VECs, including the following:

a) Economy of the region;
b) Value of existing industries, including tourism, cultural and recreational; commercial, and Indigenous fisheries and hunting; and other major employers;
c) Employment in the region; and
d) Availability of skilled and unskilled labour in the region and the province.

4.2.7 Tourism, Heritage and Cultural Resources

The EIS shall describe relevant tourism, cultural and heritage resources in the study areas of the VECs, including, but not limited to, the following:

a) Tourism, including natural attractions and tourism generating resources;
b) Historic and archaeological resources; and
c) Burial, cultural, spiritual and heritage sites.

5 DATA GAPS

The EIS shall explain any extrapolation, interpolation or other manipulation applied to

describe existing environmental conditions in the study area. Any information gaps from a lack of previous research or practice shall be described indicating information that is not available or existing data that cannot accurately represent environmental conditions in the study area. Previous research should be relevant both temporally and spatially. If data gaps remain, the EIS shall describe its efforts to resolve the data gaps, including any direct consultation with governments, non-government organizations, the public and others.

6 ENVIRONMENTAL EFFECTS

6.1 Predicted Future Condition of the Environment if the Undertaking Does Not Proceed

The EIS shall describe the predicted future condition of the environment within the expected life span of the Project if the Project were not to proceed. The predicted future condition of the environment shall help to distinguish Project-related effects from environmental change due to natural processes.

6.2 Predicted Environmental Effects of the Undertaking

The EIS shall contain a comprehensive analysis of the predicted environmental effects of each Project alternative for the VECs. If the effects are attributable to a particular phase of the Project (construction, operation and maintenance, decommissioning and rehabilitation), to a particular component, or to accidents or malfunctions, then they should be designated as such. Predicted environmental effects (positive and negative, direct and indirect, and short and long-term) shall be defined quantitatively and qualitatively, where applicable, for each Project alternative and for each VEC. Environmental effects predictions shall be explicitly stated and the theory or rationale upon which they are based shall be presented in terms of the following parameters:

- nature;
- magnitude (qualitative and quantitative);
- geographic (spatial) extent;
- timing, duration and frequency;
- degree to which effects are reversible or can be mitigated;

- ecological context;
- level of knowledge;
- the capacity of renewable resources that are likely to be significantly affected by the Project, to meet the needs of present and future generations;
- the extent to which biological diversity is affected by the Project; and
- the extent of application of the precautionary principle to Project mitigation measures.

Predicted environmental effects of the Project shall include, but not be limited to, a comprehensive analysis of the following:

a) Effects of the Project on ambient air quality, including, but not limited to, emission contaminants with emissions trajectory completed by a third party and identification of the effects of air emissions on the ambient air quality during the operation and maintenance phase; and

b. Effects of all phases of the Project on surface water bodies and groundwater aquifers, including, but not limited to, the following:

    a) A description of the duration, frequency, magnitude and spatial extent of any effects on nearby surface and groundwater quality and quantity resulting from the Project activities, including potential effects on recreational and other users of nearby surface water and groundwater aquifers;
    b) effects of the incinerator and associated infrastructure on water quality and quantity, including private and public drinking water systems;
    c) composition of wastewater based on laboratory analysis, wastewater treatment requirement and effects of the wastewater if discharged into the water of Lewisporte Harbour;
    d) capacity of the receiving environment to manage wastewater discharge from the incinerator; and
    e) effects on existing and potential commercial, recreational, and Indigenous fisheries (if any).

c. Effects of all phases of the Project on flora and fauna (including plants, migratory

birds, birds protected by the **Migratory Birds Convention Act**, species at risk and of conservation concern), and their habitat (including critical, sensitive and rare habitat), associated with, but not limited to, the following:

a) direct and indirect effects of Project activities during the construction, operation and maintenance, decommissioning and rehabilitation phases;
b) emissions, discharges and releases of substances;
c) land disturbance that has the ability to act as a temporary habitat for species at risk and species of conservation concern; and
d) noise, and in particular effects on feeding, breeding, movement and migratory patterns.

d. Effects of all phases of the Project on land use and tenure, including, but not limited to, the following:
    a) existing land tenure, including Crown land tenure and private land ownership and restrictions for Project development associated with existing land tenure;
    b) municipal zoning and development control compliance;
    c) traditional, cultural and recreational activities; and
    d) tourism establishments and operations.
e. Potential effects of all phases of the Project on the local community, including human health and quality of life, but not limited to, effects from the following:
    a) air emissions, including atmospheric dispersion modelling of air emissions from the Project during the operation and maintenance phase and the results compared to acceptable standards;
    b) dust, odor and noise;
    c) wastewater;
    d) hazardous biomedical waste; and
    e) incineration ash.
f. Potential effects of the Project on the economy, employment and business, including, but not limited to the following:
    a) jobs;

b) revenue; and
c) effects on the local businesses.

g. Potential Effects of the Project on local tourism, heritage and cultural resources for all phases of the Project.

6.3 Accidents and Malfunctions

The EIS will identify and describe the potential accidents and malfunctions related to all components of the Project, including an explanation of how those events were identified, potential consequences (including the potential environmental effects), the worst-case scenarios as well as emergency scenarios that can reasonably be expected to occur, and the effects of these scenarios. The EIS will explain the potential quantity, mechanism, rate, form, and characteristics of the materials likely to be released into the environment during the malfunction and accident events. Potential accidents and malfunctions may include, but not be limited to the following occurrences:

a) procedures to address sorting errors at the incineration location such as receiving radioactive waste, heavy metals, halogenated waste, unstable waste, and the ratio of combustibles/non-combustibles and moisture that may cause equipment malfunction;
b) accidental spills and/or releases of biomedical wastes or any potentially hazardous substance on land or in air or water;
c) release of air emissions contaminants;
d) fire and explosions;
e) traffic accidents;
f) failure of water supply;
g) energy generation/transmission failure;
h) wastewater discharge malfunctions; and
i) failure in the PCS of the incinerator.

The EIS shall assess the likelihood of occurrence and consequence severity of the accidents and malfunctions.

6.4 Cumulative Environmental Effects

The EIS shall identify and assess the Project's cumulative environmental effects. Cumulative effects are defined as changes to the environment and resident species and their habitat in the area due to the Project and combined with the effects of past, present, and reasonably foreseeable future planned projects and/or developments and activities in the area. A project causes a cumulative effect if the potential impacts associated with the undertaking will cause an additive effect when added to other projects in the region and in consideration of climate change. A comprehensive examination of all cumulative effects within the study area must be included. The EIS shall consider the cumulative environmental effects for the life of the Project where those overlap with those of other projects and activities within or near the study area. Boundaries for assessing the cumulative effects of the Project in combination with other projects and activities that have been or will be carried out will generally be different from (larger than) the boundaries for assessing the effects of the Project, and shall:

a) identify and justify the environmental components that will constitute the focus of the cumulative effects assessment, including, but not limited to, handling of biomedical waste, incineration, air emissions from the site and the existing sources of air emissions, wastewater from the site and from any other sources, wastewater discharge into Lewisporte Harbour, noise and odor;
b) present a justification for the geographic and temporal boundaries of the cumulative effects assessment;
c) describe and justify the choice of projects and selected activities for the cumulative effects assessment, including washing of the waste containers used for storing biomedical waste and incineration activities during the operation and maintenance of the Project; and
d) describe the mitigation measures and determine the significance of the residual cumulative effects; and
e) where appropriate demonstrate how land use knowledge was incorporated in the above requirements for the cumulative effects analysis.

The cumulative effects assessment must include consideration of cumulative effects in

relation to the ability of Indigenous Peoples to exercise their rights and culture. Both the content and means of presenting this information is to be developed in consultation with each potentially impacted Indigenous group. Proponents must collaborate with Indigenous groups in assessing the cumulative impacts of the Project on the rights and interests of Indigenous Peoples.

6.5 Effects of the Environment on the Project

Environmental changes and hazards that may occur and may affect the Project shall be described (e.g. extreme ambient air temperatures and wind, severe precipitation events, flooding, etc.). The EIS shall take into account the potential influence of climate change scenarios (e.g. predicted increased severity and frequency of storms and flooding, changes to precipitation quantity and recharge rates), as well as local knowledge. The influence that these environmental changes and hazards may have on the Project, shall be predicted and described. The environmental effects that may occur as a result of the environment acting on the Project shall be assessed.

7 ENVIRONMENTAL PROTECTION – MITIGATIONS AND PLANS

7.1 Mitigations

The EIS shall identify and discuss proposed measures that will be implemented to mitigate the significant adverse effects and enhance the beneficial effects of the Project. The rationale for and effectiveness of the proposed mitigation and enhancement measures should be discussed and evaluated. The EIS, where possible, should refer to similar situations where the proposed mitigation has proven to be successful. Mitigation failure should be discussed with respect to risk and severity of consequence.

The EIS shall identify who is responsible for implementing the mitigation measures and the system of accountability, including the obligations of contractors and subcontractors.

Mitigation measures shall be described for the effects identified in section 6.2 of the EIS during construction, operation and maintenance, decommissioning and rehabilitation.

Other mitigation measures that were considered may be identified, and the rationale for

rejecting these measures explained. The implementation of the best available technology and best management practices shall be described. Avoidance of environmental effects through implementation of scheduling and siting constraints and pollution prevention opportunities shall be considered. Trade-offs between costs and predicted effectiveness of the mitigation measures shall be justified.

a) The EIS shall describe how plume dispersion modelling for the pollutants listed in Tables I and III of Schedule A of the Air Pollution Control Regulations (APCR) would be conducted to determine the projected ground level concentrations and anticipated state of compliance of the emissions from the stack.
b) The EIS shall describe how verification of the in-stack emission standards for mercury, and dioxins and furans in Schedule B of the APCR, would be determined by an independent third party, and from another similar operation elsewhere in North America.
c) The EIS shall describe Standard Operating Procedures that would be implemented for biomedical waste material handling with the objective of minimizing the release of odours.
d) The EIS shall include an analysis of the Best Available Control Technology (BACT) as it relates to handling hazardous/waste dangerous goods, burning of waste, emissions, air pollution and odor. A range of machinery and equipment options should be proposed that are technically and economically feasible and reduce or minimize air emissions within the context of other regulatory requirements such as air pollutants, occupational health and safety, and fire and life safety regulations, and identify the recommended approach.
e) The EIS shall describe measures that would be undertaken to mitigate the effects of all phases of the Project on surface water bodies, wetlands, and groundwater aquifers, private and public water supplies in and adjacent to the Project area, including, but not limited to, the following:
    i. changes in nearby surface and groundwater quality and quantity resulting from water uses from the municipal water supply, including potential effects on the water quality of Lewisporte Harbour;

ii. quality confirmation of the wastewater through laboratory analysis prior to discharging wastewater into the sewer system and/or any public water body to comply with the Environmental Control Water and Sewage Regulations;
iii. capacity of the receiving environment to manage wastewater discharge from the incinerator; and
iv. effects on existing and potential commercial, recreational, and Indigenous fisheries (if applicable).

f) The EIS shall describe measures that would be undertaken to mitigate the effects of all phases of the Project on flora and fauna (including plants, migratory birds, birds protected by the **Migratory Birds Convention Act**, species at risk and of conservation concern), and their habitat (including critical and sensitive habitat), associated with, but not limited to, the following:
    i. direct and indirect effects of Project construction, operation and maintenance, decommissioning and rehabilitation;
    ii. emissions, discharges and releases of substances from the Project, including vehicular equipment;
    iii. land disturbance that can act as a temporary habitat for species at risk and species of conservation concern;
    iv. direct and indirect effects on individuals and habitat quality due to accidents and malfunctions during all Project phases; and
    v. noise and in particular effects on feeding, breeding, movement and migratory patterns.

g) The EIS shall describe measures that will be undertaken to mitigate potential land use and tenure, including, but not limited to, the following:
    i. municipal zoning, permitted/discretionary use in designated zones, and permissibility of Project features that overlap municipal zones;
    ii. traditional, cultural and recreational activities; and
    iii. tourism establishments and operations.

h) The EIS shall describe measures to mitigate adverse effects of the Project on

communities, and in particular on human health and quality of life, including, but not limited to, the following:

i. dust and air emissions, including emissions from vehicular equipment;
ii. noise and odor;
iii. solid waste and wastewater discharge;
iv. increased heavy equipment traffic; and
v. fire.

7.2 Plans

The EIS shall include plans, either in section 7.2 or as appendices to the EIS that describe procedures, equipment and responsibilities that are in place to ensure an efficient and effective response to aspects of the Project that could adversely affect the receiving environment, including, but not limited to, the following plans:

- Site Plan (illustration and dimensions)
- Emergency Response/Contingency Plan;
- Waste Management Plan;
- Wastewater Management Plan;
- Air Dispersion Modelling Plan;
- Public Consultation Plan; and
- Site Decommissioning and Rehabilitation Plan.

7.2.1 Site Plan

The EIS shall include a Site Plan of the Project. The Site Plan shall include a clear graphic representation of all existing and proposed on-site Project features, components, and dimensions. The Site Plan shall include, but not limited to, the following:

a) existing and proposed buildings;
b) access road and parking;
c) drainage facilities and sewer and water lines;
d) security fencing;
e) lighting;

f) fuel storage tank storage;
g) landscaping and gardening (if any); and
h) fire hydrant and muster station.

7.2.2 Emergency Response and Contingency Plan

The EIS shall include an Emergency Response/Contingency Plan outlining procedures to respond to accidents, malfunctions and emergencies, including, but not limited to, the following:

a) accidental spills and/or releases of biomedical wastes or any potentially hazardous substance on land or in air or water;
b) fire and explosion;
c) traffic accidents (road);
d) hurricanes and other natural disasters;
e) occupational hazards and human injuries;
f) failure of water supply;
g) failure of power supply; and
h) response in the event the incinerator operation is interrupted for an extended period of time, including a forced shutdown for failing an emission test;

The Emergency Response / Contingency Plan shall establish an emergency communication strategy with those potentially affected and must describe the capacity of the Proponent / nearby communities to respond to each type of accident, malfunction, or emergency, including the availability of required response equipment and training.

7.2.3 Waste Management Plan

The EIS shall include a Waste Management Plan that is prepared as per the guidance document of the Pollution Prevention Division and covers the construction and operation and maintenance phases of the Project. A Waste Management Certificate of Approval (COA) is required and must be obtained prior to any development. As part of the process to obtain a COA, a Waste Management Plan is required to be submitted for review and approval prior to project commencement.

7.2.4 Wastewater Management Plan

The EIS shall include a Wastewater Management Plan to continuously monitor the generation and discharge of wastewater produced from the project site, specifically wastewater from the wash bay to ensure that the discharge of wastewater complies with the provincial Environmental Control Water and Sewage Regulations. An alternative plan for the wastewater discharge should be made in the event that the wastewater can not be discharged into the Town's sewer system and/or new legislation imposes restrictions on wastewater discharge into water bodies.

7.2.5 Air Dispersion Modelling Plan

The EIS shall describe a plan for air dispersion modelling, including frequency, and a response that will be implemented in the event that the APCR is not met. The plan shall include a contingency program to respond to odor complaints and a complaint resolution process that would be followed should public complaints arise about odor from the facility odor diagnosis methods, measures for odor management, odor monitoring and control and a contingency program to respond to odor complaints.

7.2.6 Public Consultation Plan

The EIS shall include a Public Consultation Plan that describes how the public can meaningfully participate in the planning of all phases of the Project (construction, operation and maintenance, decommissioning and rehabilitation) and how they will continue to be consulted throughout the life of the Project, including in the monitoring of environmental effects.

7.2.7 Site Decommission and Rehabilitation Plan

The EIS shall include information on the plan for how the site including all equipment and vehicles will be decommissioned and how the site will be rehabilitated as per the regulations and guidelines of the government departments.

8 RESIDUAL EFFECTS AND DETERMINATION OF SIGNIFICANCE

Residual effects are those adverse environmental effects which cannot be avoided or mitigated through, or that remain after, the application of mitigation measures including environmental control technologies and best management practices. The EIS shall list and contain a detailed discussion and evaluation of residual effects, which shall be defined in terms of the parameters outlined in section 6.2.

The EIS shall contain a concise statement and rationale for the overall conclusion relating to the significance of the residual adverse environmental effects. The EIS will, for ease of review, include a matrix of the environmental effects, proposed mitigation, and residual adverse effects.

9 ASSESSMENT SUMMARY AND CONCLUSIONS

The EIS shall summarize the overall findings of the environmental assessment, with emphasis on the key environmental issues identified.

10 PUBLIC CONSULTATION

Under Section 58 of the **Environmental Protection Act**, during the preparation of an environmental impact statement, the Proponent shall provide an opportunity for interested members of the public to meet with the Proponent at a place adjacent to or in the geographical area of the undertaking, or as the Minister may determine, in order to

- provide information concerning the undertaking to the people whose environment may be affected by the undertaking; and
- record and respond to the concerns of the local community regarding the environmental effects of the undertaking.

Under Section 10 of the Environmental Assessment Regulations, the Proponent shall notify the Minister and the public of a meeting scheduled with the public under Section 58 of the **Act** not fewer than 7 days before that scheduled meeting.

These concerns shall be presented and addressed in a separate chapter of the EIS document. Protocol for the public meeting shall comply with the legislation and with the

divisional policy included in Appendix B.

11 REFERENCES

The Proponent shall prepare a complete and detailed bibliography of studies used to prepare the EIS. Supporting documentation shall be referenced in the EIS and submitted in separate volumes or attached as an appendix to the EIS.

12 PERSONNEL

The names and qualifications of key professionals responsible for preparing the EIS and supporting documentation shall be included. A description of the qualifications of scientists conducting surveys and scientific studies associated with the undertaking shall be provided.

13 COMMITMENTS MADE IN THE EIS

The EIS is a statement of the Proponent's environmental conclusions and commitments related to the Project and must be explicitly endorsed by the Proponent. The EIS shall provide a list of all commitments made regarding environmental effects mitigation, monitoring and follow-up. Each commitment must be cross-referenced to the section of the EIS where it has been made.

14 COPIES OF REPORTS

The EIS should be prepared according to these guidelines and once completed, the Proponent shall submit printed and electronic copies of the EIS to the Department of Environment and Climate Change as specified below:

- 3 electronic copies (USB drives), and
- 1 paper copy.

The Minister reserves the right to request additional digital and paper copies, if required.

Stand-alone studies associated with the EIS, including baseline studies and plans required in section 7 of the EIS guidelines (above) shall be included in the body of the EIS or as appendices.

The Proponent shall make printed copies of the EIS available at public libraries or viewing centers in the Project vicinity, to be approved by the Department of Environment and Climate Change.

APPENDIX A: EIS GUIDELINES UNDER SECTION 57 OF THE ENVIRONMENTAL PROTECTION ACT, 2002

57. An environmental impact statement shall be prepared in accordance with the guidelines, and shall include,

a) a description of the undertaking;

b) the rationale for the undertaking;

c) the alternative methods of carrying out the undertaking and alternatives to the undertaking;

d) d) a description of the

   i. present environment that will be affected or that might reasonably be expected to be affected, directly or indirectly, by the undertaking, and

   ii. predicted future condition of the environment that might reasonably be expected to occur within the expected life span of the undertaking, if the undertaking was not approved;

e) a description of the

   i. effects that would be caused, or that might reasonably be expected to be caused, to the environment by the undertaking with respect to the descriptions provided under paragraph (d), and

   ii. actions necessary, or that may reasonably be expected to be necessary, to prevent, change, mitigate or remedy the effects upon or the effects that might reasonably be expected upon the environment by the undertaking;

f) an evaluation of the advantages and disadvantages to the environment of the undertaking, the alternative methods of carrying out the undertaking and the alternatives to the undertaking;

g) a proposed set of control or remedial measures designed to minimize any or all significant harmful effects identified under paragraph (e);

h) a proposed program of study designed to monitor all substances and harmful effects that would be produced by the undertaking; and

i) a proposed program of public information.

APPENDIX B: REQUIREMENTS FOR PUBLIC MEETINGS/INFORMATION SESSIONS

Department of Environment and Climate Change Requirements for Public Meetings/Information Sessions

Purpose: To clarify for Proponents and the public, the format, scheduling, number, notification requirements, etc. for public consultations in relation to undertakings required under the **Environmental Protection Act, SNL 2002 cE-14.2**, (Section 58) to prepare an Environmental Impact Statement (EIS).

1. The Proponent is required to conduct public meeting(s) (information sessions) under an EIS process as specified in the legislation.
2. A public meeting shall normally be held in the largest local population centre within the Project area. This shall be the minimum requirement. In addition, when demonstrated public interest or concern warrants, additional meetings may be required. This may take the form of additional meetings to be held in major regional or provincial population centres, or possibly additional meetings within the original community. Such requirements are at the discretion of the Minister based on consensus advice from the EAC chairperson and based upon public interest as evidenced by public submissions received.
3. The format of the public meeting may be flexible, and the Proponent is free to propose a suitable format for approval by the EAC. The format may range from formal, in-person public meetings chaired by the Proponent or representative with presentations followed by questions and answers, to a less formal open house forum where the public may discuss the proposal with the Proponent or representatives, to a virtual format and platform or a combination of the previously described formats. Other formats may be considered by the EAC. The purpose of the public information session is to provide information concerning the proposed undertaking to those who may be affected, and 2) to record the concerns of the

local community regarding the undertaking. Any format must meet these objectives.

4. The Proponent must ensure that each public meeting is advertised in accordance with the following specified public notification requirements, which shall form part of the Project guidelines when appropriate (Proponent to substitute appropriate information for italicized items).

PUBLIC NOTICE

Public Information Session on the Proposed

Name of undertaking
Location of undertaking

shall be held at
Date and Time Location

This session shall be conducted by the Proponent,
Proponent name and contact phone number, as part of
the environmental assessment for this Project.

The purpose of this session is to describe all aspects of the proposed Project, to describe the activities associated with it, and to provide an opportunity for all interested persons to request information or state their concerns.

ALL ARE WELCOME

- Where applicable, minimum newspaper ad size: 2 columns wide and minimum posted ad size: 10 cm x 12 cm.
    - Minimum newspaper ad frequency (to be run in newspaper(s) locally distributed within each meeting area or newspaper(s) with the closest local distribution area):
        - for dailies, the weekend between 2 and 3 weeks prior to each session and the two consecutive days prior to each session, or
        - for weeklies, in each of the two weeks prior to the week in which the session is to be held.
- Minimum posted ad coverage: In the local Town or City Hall or office, and the local post office, within the Town or City where the meeting is to be held, to be posted continually for not less than 15 days prior to each session. The Proponent is advised to request that the ad and/or notice of the meeting be placed on the community website, for each community within/adjacent to the Project study area, to be posted continually for not less than 15 days prior to each session.
- Any deviation from these requirements for any reason must receive the prior

written approval of the Minister. The Proponent must provide the chairperson of the EAC with copies of advertisements and public notices.

- The Proponent is advised to propose other effective means of publishing public notice for the Minister's consideration and approval, which may include but not be limited to:
    - Social media announcements;
    - Electronic ads in local media (e.g., community TV channels and radio stations);
    - Notice to nearby towns;
    - Notice to local MHA Office – District of Lewisporte – Twillingate; and
    - Notice to local associations, non-government organizations and groups.

It is incumbent upon the Proponent to provide sufficient opportunity for Indigenous communities and the public to participate in and information session.