

Attachment B
Regulatory and Technical Advice from Government Departments/Divisions

EA #: 2375 – St Lawrence Spaceport Complex (the Project)
NordSpace Atlantic Corporation (the Proponent)

1 Climate Change Branch (CCB), Department of Environment, Conservation and Climate Change (ECC)

- 1.1 Proponent is advised to consider provincial climate change projections regarding precipitation for St. Lawrence in the planning for this undertaking.
- 1.2 Proponent is advised that the clearing of trees and brush can contribute to climate change.
- 1.3 Proponent is advised to operate heavy equipment in a manner that maximizes fuel efficiency, thereby reducing greenhouse gas emissions that could contribute to climate change. For further information, please contact the CCB at (709) 729-1485.

2 Pollution Prevention Division (PPD), ECC

- 2.1 Proponent is advised to comply with the Air Pollution Control Regulations under the **Environmental Protection Act** and be aware of the prohibitions of burning waste according to Schedule D of these Regulations.
- 2.2 Proponent is advised that all fuel storage tank systems, other than those connected to a heating appliance of capacity of 2,500 litres or less, require registration prior to installation.
- 2.3 Proponent is advised all fuel storage systems must meet the Storage and Handling of Gasoline and Associated Products Regulations.
- 2.4 Proponent is advised the storage, handling and disposal of used and or waste oil/glycol must comply with the Used Oil and Used Glycol Control Regulations.
- 2.5 Proponent is advised that all waste material generated on site shall be removed and disposed of at an approved waste disposal facility.
- 2.6 Proponent is advised the use of halocarbons or other related substances in fire suppression, air conditioning or refrigeration systems associated with the Project are subject to the Halocarbon Regulations. For further information, contact PPD at (709) 729-5782.

3 Water Resources Management Division (WRMD), ECC

- 3.1 Proponent is advised to maintain a minimum 15-metre buffer around the various streams and waterbodies (including wetlands) that occur within the Project's boundary, except for those that are to be infilled for the construction of infrastructure.

The Atlantic Spaceport Complex, St. Lawrence



- 3.2 Proponent is advised to apply for and obtain a Section 48 Permit under the **Water Resources Act**, 2002, for any work in or within 15 metres of a body of water (including wetlands) prior to the start of construction.
- 3.3 Proponent is advised to apply for and obtain a water use permit under the **Water Resources Act**, 2002, for the use of water from any water source for any purpose. This must be stated for all non-domestic uses with an existing, new or planned water use from any water source.
- 3.4 Proponent is advised that any effluent or runoff leaving the site will be required to conform to the requirements of the Environmental Control Water and Sewage Regulations.
- 3.5 Proponent is advised to apply for and obtain a Section 58 Permit under the **Water Resources Act**, 2002, for the construction of any drilled wells.
- 3.6 Proponent is advised to consider alternate routes for the access road that don't pass through the natural drainage area for Butler's Brook which could impact water quality for the community. The delineation of the complete natural watershed for Butler's Brook can be viewed through the NL Water Resources Portal (<https://maps.gov.nl.ca/water/>). For further information, please contact the WRMD at (709) 729-2563.

4 Department of Energy and Mines (EM)

- 4.1 Proponent is advised quarry materials used must be sourced from an approved site with a valid quarry Permit or Lease, a byproduct of an approved development, or from within the legal boundary of the Project site in compliance with applicable regulations.
- 4.2 Proponent is advised that quarry materials (e.g., aggregate, fill, rock, stone, boulders, gravel, sand, clay, borrow material, topsoil, peat) may not be legally removed off-site unless they are the byproduct of an approved development.
- 4.3 Proponent is advised that the Project overlaps with multiple mineral licences. For further information, please contact the Mines Branch at (709)729-5748.
- 4.4 Proponent is advised that should it meet the definition of an Industrial Customer, as defined in the **Electrical Power Control Act**, 1994, the provisions of section 14.1 may apply with respect to generating electricity for its own use.
- 4.5 Proponent is advised to provide concrete information on the power requirements for the mission control centre. For further information, please contact EM at (709) 729-1582.

5 Department of Forestry, Agriculture and Lands (FAL)

- 5.1 Proponent is recommended to advise Crown Land title holders and any private landowners within the Project area of any proposed activities and the associated timelines.
- 5.2 Proponent is advised to operate under the **Lands Act** and that it is the Proponent's responsibility to identify and apply for the Crown Lands required for the undertaking prior to Project commencement.
- 5.3 Proponent is advised that activities within the 15-metre Shoreline Reserve of any water body shall adhere to the Regulations in Section 7 of the **Lands Act**.
- 5.4 Proponent is advised to adhere to section 3 of the Cutting of Timber Regulations under the **Forestry Act** and to obtain the necessary permits prior to conducting any work during Forest Fire Season.
- 5.5 Proponent is advised to avoid disturbance within a 5-metre radius of any geodetic control monuments and that the GIS and Mapping Division is required to be contacted at GMD@gov.nl.ca if development within the proposed Project area has the potential to disturb an existing Control Survey Marker per Section 65 of the **Lands Act**.
- 5.6 Proponent is advised to operate under the **Wild Life Act** and **Migratory Birds Convention Act** and associated regulations to avoid or minimize adverse impacts.
- 5.7 Advised that several species are currently being assessed for designation and listing under the **Newfoundland and Labrador Endangered Species Act (NLESA)** and the federal **Species at Risk Act (SARA)**. The Proponent should be aware that if species that are designated and listed under this legislation are

found within the Project area, the Proponent may be required to develop mitigations, in consultation with the Wildlife Division and must obtain a Section 18 permit of the **NLESA** for any Species at Risk (SAR) surveys that could potentially disturb the species. For further information, please contact FAL at (709) 637-2950.

6 Government Service Centre (GSC), Department of Government Services (GS)

- 6.1 Proponent is advised to consider developing a contingency plan specific to the proposed undertaking to enable a quick and effective response to a spill event. Personnel working on the Project should be knowledgeable about response procedures. Any spill or leak of gasoline or associate product is to be reported immediately to GMSD by calling the Environmental Emergencies Telephone Line at 772-2083 or 1-800-563-9089.
- 6.2 Proponent is advised that gasoline and associated products used are to be confined in a liquid tight fireproof containment area. Any product, water and foam mixture remaining in the containment area shall be pumped into a drum or closed container, for collection by an approved waste oil collector, or be routed through an approved oil water separator before discharge to the environment.
- 6.3 Proponent is advised to submit electrical plans to GSC for review and approval as electrical permits are required for each meter at the site.
- 6.4 Proponent is advised to submit and receive approval for plans and specification for approved sewage disposal system, should the development require the installation of a subsurface sewage disposal system.
- 6.5 Proponent is advised application shall be made to the GSC for Fire/Life Safety review and approval as well as Building Accessibility review and approvals.
- 6.6 Proponent is advised to obtain a Development Permit under the Protected Road Zoning Regulations for any construction within 400 metres of the centreline of Route 220.
- 6.7 Proponent is advised to maintain a 30-metre undisturbed buffer around any surrounding watercourse or water body where possible.
- 6.8 Proponent is advised to maintain a 30-metre tree screen between the highway right-of-way and the Project area and any existing tree screens must be maintained. For further information, please contact GSC at (709) 729-2008.

7 Occupational Health and Safety (OHS), GS

- 7.1 Proponent is advised to ensure that activities are conducted in compliance with the **Occupational Health and Safety Act (OHS Act)** and related regulations. This includes the responsibility for ensuring that, should contractors be hired to perform work, also comply with the legislation. For further information, please contact OHS at (709) 729-7454.

8 Department of Health and Community Services (HCS)

8.1 Proponent is advised to comply with the Sanitation Regulations under the **Health and Community Services Act** for sewage disposal systems and water supply meant for human consumption. For further information, please contact HCS at (709) 729-3422.

9 Department of Jobs, Growth and Rural Development (JGRD)

9.1 Proponent is advised to connect early with post-secondary institutions and regional workforce committees to address skills gaps and begin the process of determining if current training programs can fill those gaps.

9.2 Proponent is advised to seek assistance with JGRD with recruitment strategies to fill full-time, long-term positions that can be fulfilled by immigration programs.

9.3 Proponent is advised to notify JGRD should the labour or workforce needs change beyond the positions noted by the Proponent. For further information, please contact JGRD at (709) 729-5054.

10 Department of Municipal and Community Affairs (MCA)

10.1 Proponent is advised to obtain a development approval and permit for the Project undertaking from the Town of St. Lawrence prior to commencement of Project. For further information, please contact MCA at (709) 729-3090.

11 Department of Tourism, Culture, Arts and Recreation (TCAR)

11.1 Proponent is advised to maintain regular communication with local tourism operators to ensure they are aware of any construction or operational activities that may impact the area and to identify and mitigate potential conflicts, reduce potential disruptions to tourism operations and visitor experiences, and support timely information sharing as the Project is expected to increase visitation from both residents and non-residents. For further information, please contact TCAR at (709) 729-6588.

12 Department of Transportation and Infrastructure (TI)

12.1 Proponent is advised to obtain a highway access permit under the **Works Services and Transportation Act** for the proposed road and that there may be upgrades required on the existing intersection.

12.2 Proponent is advised to submit a Traffic Impact Study to TI for review to gauge the extent of traffic generated as part of this development. For further information, please contact TI at (709) 729-5972.

13 Environment and Climate Change Canada (ECCC)

13.1 Proponent is advised of their responsibility to ensure compliance with the **Migratory Birds Convention Act (MBCA)**, the **Species at Risk Act (SARA)**, the **Canadian Environmental Protection Act (CEPA)** and associated regulations, including the Environmental Emergency Regulations.

13.2 Proponent is advised to provide comprehensive information regarding the baseline environmental conditions, particularly regarding the presence of migratory birds, species at risk (SAR), and species of conservation concern (SOCC) that may be present in the Project Area, including identifying habitat that meet their criteria.

13.3 Proponent is advised to develop the following contingency plans:

- A Contingency Plan that considers potential accidents and malfunctions, and site-specific conditions and sensitivities
- A Spill Prevention and Response Plan
- An Emergency Response Plan
- A Wildlife Response Plan

13.4 Proponent is advised to develop effective mitigation strategies related to the use of kerosene (RP-1) and liquid oxygen (LOX) in the Environmental Protection Plan to address safe handling and storage, comprehensive emergency response procedures, ongoing environmental monitoring, and assessment of cumulative and climate-related impacts, including broader atmospheric consequences. Proponent is encouraged to be up to date on the National Pollutant Release Inventory.

13.5 Proponent is advised to find alternative fire suppression than the PFAS (per- and polyfluoroalkyl substances) -containing firefighting foams to reduce the potential release of persistent “forever chemicals” to the environment.

13.6 Proponent is advised to provide detailed information regarding the fate of the upper stage following payload deployment and confirm that no debris is expected from the first stage of the launch vehicle, including any measures in place to prevent debris generation and potential environmental impacts.

13.7 Proponent is advised to provide information on potential impacts of the small-lift orbital launches on migratory birds and species at risk, in particular the potential for collisions and potential incineration if birds come too close to the launch components and to include this in an effects assessment.

13.8 Proponent is advised that the trajectory of the orbital launches may result in potential impacts to species of coastline and open-water associated migratory birds present at Corbin Island (Leach's Storm-petrel and Herring Gull). ECCC recommends maintain a 300-m buffer around Corbin Island, post launch monitoring and a specific management plan to ensure that no emissions, fluids, or debris from regular operations or potential accidents or malfunctions will impact migratory birds and SAR.

13.9 Proponent is advised to develop and implement measures to diminish the risk of introducing invasive species. For further information, please contact ECCC at (709) 772-4313 or (709) 853-1304.

14 Fisheries and Oceans Canada (DFO)

14.1 Proponent is advised to refer to the Projects Near Water website for information about how to comply with the **Fisheries Act** as well as information on the Project review process when conducting work in or near water. The 'Projects Near Water' website is located at <https://www.dfo-mpo.gc.ca/pnw-ppe/index-eng.html>. For further information, please contact the Fisheries Protection Program at (709) 772-4140.

15 Transport Canada (TC)

15.1 Proponent is advised that an authorization from the Minister of Transport is required under the Canadian Aviation Regulations.

15.2 Proponent is advised that compliance with the **Transportation of Dangerous Goods Act (TDGA)** is mandatory when handling and/or transporting any regulated dangerous goods.

15.3 Proponent is advised that the Project may implicate a non-scheduled waterway defined under the **Canadian Navigable Waters Act (CNWA)** and that an authorization(s) under the CNWA may be required. More information on this process can be found at <http://www.tc.gc.ca/eng/programs-621.html>. For further information, please contact the Navigation Protection Program directly at (506) 851-3113 or NPPATL-PPNATL@tc.gc.ca.