

Point Rousse Marine Terminal Ltd.

Point Rousse – Port Expansion Project

INITIAL PROJECT DESCRIPTION

PURSUANT TO
IMPACT ASSESSMENT ACT, 2019

PROJECT REGISTRATION

PURSUANT TO
**THE NEWFOUNDLAND AND LABRADOR
ENVIRONMENTAL PROTECTION ACT**

Submitted to:

The Impact Assessment Agency of Canada

and

**NL Department of Environment, Conservation and Climate Change
Environmental Assessment Division**

Submitted by:

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December 2025

Initial Project Description / Environmental Assessment Registration Document

Point Rousse – Port Expansion Project

Baie Verte, NL

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B	RB	SL	RB	2025/10/16	All	Final Draft
C	RB	SL	RB	2025/11/25	All	Final

ACRONYM AND ABBREVIATIONS

AC CDC	Atlantic Canada Conservation Data Centre
AIS	Aquatic Invasive Species
asl	above sea level
CAC	Criteria Air Contaminants
CH ₄	Methane
CNWA	<i>Canadian Navigable Waters Act</i>
CO ₂	Carbon Dioxide
CO ₂ e	Carbon Dioxide Equivalent
COSEWIC	Committee on the Status of Endangered Wildlife in Canada
CWS	Canadian Wildlife Service
DFO	Fisheries and Oceans Canada
DWT	deadweight tonnage
EA	Environmental Assessment
ECCC	Environment and Climate Change Canada
FireFly	FireFly Metals Canada Ltd.
FSC	Food, Social, and Ceremonial
FTE	Full-time Equivalent
GHG	Greenhouse Gas
ha	hectare
IAA	<i>Impact Assessment Act</i>
IAAC	Impact Assessment Agency of Canada
IPD	Initial Project Description
km	kilometre
m	metre
mm	millimetre
N ₂ O	Nitrous Oxide
NAFO	Northwest Atlantic Fisheries Organization
NL	Newfoundland and Labrador
NLDECCC	Newfoundland and Labrador Department of Environment, Conservation and Climate Change
NL EPA	<i>NL Environmental Protection Act</i>
NL ESA	<i>NL Endangered Species Act</i>
NOC	National Occupational Classification
PRMT	Point Rousse Terminal Ltd.
Qalipu	Qalipu Mi'kmaq First Nation
SAI	Shoreline Aggregate Inc.
SAR	Species at Risk
SARA	<i>Species at Risk Act</i>
SCH	Small Craft Harbours
SOCC	Species of Conservation Concern
ug/L	microgram per litre

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1 INTRODUCTION

Point Rousse Marine Terminal Ltd. (PRMT), the Proponent, plans to build and operate a second marine export berth at their existing port facilities at Point Rousse, Newfoundland and Labrador (NL) (hereinafter referred to as “the Project”) to primarily export construction aggregate and armourstone from Shoreline Aggregates Inc.’s (SAI’s) existing and future planned quarry operations. The Project includes the construction, operation, and rehabilitation and closure of the proposed marine terminal facilities.

The Project is subject to both federal and provincial environmental assessment (EA) requirements. Federally, the Project is considered a designated physical activity as per Section 53 of the *Physical Activities Regulations*, pursuant to the *Impact Assessment Act* (IAA). Therefore, submission of an Initial Project Description (IPD) to the Impact Assessment Agency of Canada (IAAC) is required.

The Project is also subject to review under the provincial EA process. As advised by the EA Division of the NL Department of Environment, Conservation and Climate Change (NLDECCC), the Project requires registration under the NL *Environmental Protection Act* (NL EPA) and Section 26 of the NL *Environmental Assessment Regulations, 2003*.

To address federal and provincial EA requirements, federal and provincial regulators have requested that a combined document be prepared to address both processes and to allow for a thorough and harmonized review process. This document therefore represents PRMT’s official submission of a combined IPD to IAAC and Registration Document to NLDECCC.

This document outlines the potential environmental, social, and economic impacts of the Project and the proposed mitigation measures to be implemented by the proponent to allow the Project to be carried out in an environmental manner acceptable to regulators and the public.

1.1 PROJECT OVERVIEW

PRMT, which is a sister company to SAI (i.e., both companies have the same shareholders), is proposing the expansion of existing port infrastructure at Point Rousse, located on the Baie Verte Peninsula, NL (Figure 1.1). PRMT may contract some operational services to SAI and other third parties, while retaining ownership of the Project.

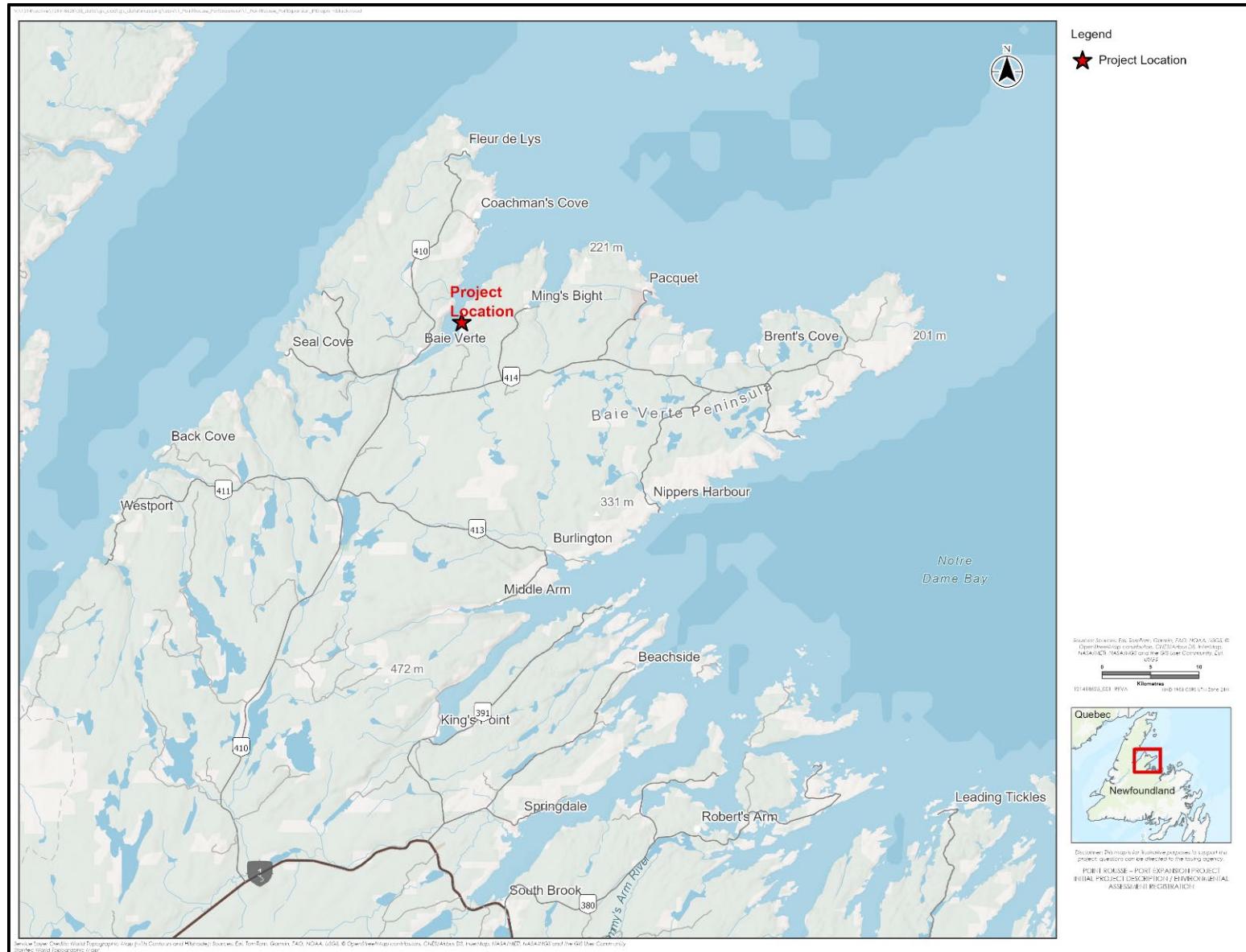


Figure 1.1 Project Location

The Project involves the extension and upgrade of marine terminal facilities at Point Rousse to support regional economic development, industrial diversification, and Canada's transition to a low-carbon economy. In addition to enabling SAI to increase its export of construction-grade aggregates, the expansion is strategically designed to accommodate multi-user capacity for bulk mineral and metal products from development and regional mining projects, including concentrates, semi-refined, and fully refined materials.

Located on the Baie Verte Peninsula, the terminal is positioned to serve a growing hub of critical and base mineral activity. In addition to FireFly Metals Canada Ltd.'s (FireFly's) Green Bay Ming Mine Project, which is advancing as a major copper producer, the region includes active or emerging projects such as those by New Found Gold Corp. and Baie Minerals. This clustering of mineral development within logistical reach of Point Rousse underscores the need for shared-use infrastructure to support the efficient movement of critical mineral products to market.

By addressing a current infrastructure gap and reducing the need for long-haul trucking to distant ports, the Project will help reduce regional emissions, lower operational costs for multiple proponents, and strengthen supply chain capacity. These benefits directly align with the objectives of the Government of Canada's Critical Minerals Strategy, which aim to unlock new resource corridors, enhance export capacity, and increase the resilience of Canada's critical mineral supply chains.

The expansion includes upgrades to quayside infrastructure, additional laydown and staging areas, and shoreline infilling. Figure 1.2 shows the existing marine terminal facilities at the Point Rousse Marine Terminal. The terminal currently consists of an approximately 120 metres (m) long loading barge with four mooring bollards located along the adjacent shoreline. Ships are loaded with product material via an approximately 400 m long conveyor which runs from the product stockpile areas to the edge of the loading barge. This then connects to a telescopic conveyor situated on the barge itself.



Figure 1.2 Existing Marine Terminal Facilities at the Point Rousse Marine Terminal

Since 2016, SAI has been exporting construction-grade aggregates to international markets from the marine terminal at Point Rousse. The original berth was developed and has operated continuously with strong environmental and regulatory governance, receiving strong community support and no recorded complaints from the public, stakeholders, or Indigenous groups. The proposed addition of a second berth is a natural expansion of this established operation and will be developed in a manner consistent with PRMT's ongoing commitment to environmental stewardship, community engagement, and regional economic development. PRMT intends to maintain its strong operational track record, while enhancing capacity to serve the growing demands of NL's resource sector.

PRMT primarily ships aggregate feed stock on behalf of SAI, with some capacity to ship mineral and metal products. This material, composed largely of repurposed waste rock from historical Pine Cove Mine operations, is nearing depletion. To maintain the continuity and long-term viability of export operations, SAI has fully permitted and established the development of two new quarries located in close proximity to the existing marine terminal. The rock formations within the quarry areas are geologically recognized for their high quality and are well-suited for processing into construction-grade aggregates. In addition to producing conventional crushed stone, SAI is diversifying its export offerings to include larger armourstone material, suitable for use in coastal and marine infrastructure applications, such as breakwaters and shoreline protection systems.

PRMT's proposed second berth will accommodate SAI's expanded product offerings (i.e., aggregate as well as armourstone). It will also allow for the extension of SAI's operations by 30 years or more, thus extending employment and associated benefits and contributing to the local and regional economies. In addition, the proposed second berth provides a number of synergies with the current berth operations, including hauling/loading costs, shared infrastructure and equipment, and sharing of management, administration, and supervision duties.

PRMT is currently engaged in commercial negotiations with FireFly regarding the future shipment of FireFly's concentrate product from their Green Bay Ming Mine Project, which was recently released from the provincial EA process. Although this material is not expected to be ready for export for several years (i.e., following permitting and construction of the Project), its eventual shipment, as well as other regional mineral and metal products would be complementary to the objectives of the current terminal expansion. In anticipation of future third-party use, PRMT has considered space requirements for laydown areas in its expansion design. While the specific facilities and infrastructure needed to support transport of mineral and metal products are still in early design stages, PRMT has included a description of the likely facilities and the mitigation to address potential effects associated with products, such as concentrate handling and loading activities.

Since the port began exporting in 2016, it has maintained a strong operational record. The company consistently applies recognized best practices in marine safety, environmental protection, and logistical coordination. This expansion will uphold those same standards while leveraging the port's existing marine safety infrastructure.

1.2 DOCUMENT ORGANIZATION

This document follows the guidelines and requirements of Schedule I of the *Information and Management of Time Limits Regulations* under the IAA and has been organized (headings and numbering) in accordance with Schedule 1 – Information Required in Initial Description of Designated Project, namely:

- **Part A:** General Information
- **Part B:** Project Information
- **Part C:** Location Information and Context
- **Part D:** Federal, Provincial, Territorial, Indigenous and Municipal Involvement and Effects
- **Part E:** Potential Effects of the Project
- **Part F:** Summary (Stand-alone Document)

As this Project is also subject to provincial EA requirements and to aid in review of the document by provincial regulators, Table 1.1 outlines the requirements for a registration document and the corresponding sections where this information can be found.

Table 1.1 Concordance with Requirements for a Provincial Environmental Registration

Environmental Registration Requirement	Reference Location
Name of the Undertaking	Section 2.1
Proponent Information	Section 2.2
Purpose / Rationale / Need for the Undertaking	Section 3.1
Description of the Undertaking (Project Description), including:	Section 3.0
Geographic location	Section 4.0
Physical and biological environment	Section 4.7
Construction phase activities, including:	Section 3.5
Approximate total construction period and proposed date of first physical construction related activity on site	Section 3.9
Potential sources of pollutants during the construction period(s) including airborne emissions, liquid effluents and solid waste materials	Section 6.6
Potential causes of resource conflicts and measures to mitigate potential adverse environmental effects on receptors and resource/land use conflicts	Section 6.0
Public and Indigenous consultation that was conducted to address construction concerns	Sections 2.3 and 2.4
Operation / maintenance phase activities, including:	Section 3.6
Estimated period of operation, if not a permanent facility	Section 3.9
Potential sources of pollutants during the operations period including airborne emissions, liquid effluents and solid waste materials	Section 6.6
Potential causes of resource conflicts and measures to mitigate potential adverse environmental effects on receptors and resource/land use conflicts	Section 6.0
Public and Indigenous consultation that was conducted to address operations concerns	Sections 2.3 and 2.4
Occupations for construction and operation phases; identify how employment equity will be addressed relative to age and gender.	Section 3.10
Alternative means to carrying out the project	Section 3.11
Project related documents	Section 7.0
Approval of the Undertaking (i.e., required permits, approvals that the Project may require)	Section 5.3
Schedule	Section 3.9
Capital Cost and Funding (source of Project funding)	Section 5.1

2 PART A: GENERAL INFORMATION

In accordance with Schedule I of the *Information and Management of Time Limits Regulations* under the IAA, Part A provides documentation on the potential effects of the Project on various components, environmental and Indigenous peoples, including:

- (1) The Project name, type or sector and proposed location.
- (2) The proponent's name and contact information and the name and contact information of their primary representative for the purpose of the description of the Project.
- (3) A summary of any engagements undertaken with any jurisdiction or other party, including a summary of key issues raised and the results of engagement and brief description of any plan for future engagement.
- (4) A list of Indigenous groups that may be affected by the carrying out of the Project, a summary of any engagement undertaken with the Indigenous peoples of Canada, including a summary of key issues raised and the results of the engagement and a brief description of nay plan for future engagement.
- (5) Any study or plan relevant to the project that is being or has been conducted of the regions where the Project is to be carried out, including any Regional Assessment carried out under the IAA or by any jurisdiction including by or on behalf of an Indigenous governing body, where the study or plan is available to the public.
- (6) Any strategic assessment, relevant to the project, that is being or has been carried out under section 95 of the IAA.

2.1 (1) PROJECT NAME, SECTOR AND LOCATION

Project Name: Point Rousse – Port Expansion Project
Sector: Marine Operations
Location: Pine Cove, Baie Verte, NL

2.2 (2) PROPONENT CONTACT INFORMATION

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2.2.1 CONTACT

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2.2.2 PRINCIPAL CONTACT PERSON FOR PURPOSES OF ENVIRONMENTAL ASSESSMENT

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2.3 (3) SUMMARY OF ENGAGEMENT

Since 2016, PRMT, through SAI, has actively engaged in regional and provincial mining industry events, notably presenting annual updates at the Annual Baie Verte Mining Conference, which attracts around 140 attendees. The company has also shared Project updates and expansion plans at various public forums including Baie Verte Peninsula Chamber of Commerce Annual General Meetings, Small Business Week luncheons, localized government official engagements during the 2024 provincial bi-election, and regional economic development forums.

PRMT's public participant list includes potentially affected and/or interested stakeholders from several groups including:

- Local municipalities
- Regulatory agencies (both provincial and federal)
- Economic development agencies, education and training institutes
- Environmental and recreation associations
- Business and industry organizations
- Indigenous groups
- Marine users of the area

PRMT has undertaken engagement activities with local and regional stakeholders to support transparency and dialogue regarding the Project (Table 2.1). These outreach efforts have provided a platform to share Project updates, provide overviews of port expansion plans, and respond to questions from community members, local business leaders, and regulators. The company's engagement approach reflects a proactive commitment to maintaining open communication and fostering local support throughout the development process.

Table 2.1 Details of Engagement Conducted to Date

Group	Date	Method	Details
Baie Verte Town Council	Ongoing	Email, Phone Call, Public Posting, In-person Meeting	Provide Project updates, consultation
Baie Verte Town Council	August 14, 2025	Letter (Appendix A)	A letter of support for the proposed Project was provided
Baie Verte Peninsula Chamber of Commerce Annual General Meetings	2022/23/24	In-person Presentation	Presentations with Power Point, updating on Project status and plannings
Small Business Week luncheons– Baie Verte Peninsula Chamber	2023/24	In-Person Attendance	Presentations with Power Point, updating on Project status and plannings
FFAW	October 1, 2025	Letter (Appendix A)	Project introduction and request for feedback.
FFAW	October 9, 2025	Email	FFAW will discuss the Project at the inshore council meeting taking place October 23-24, 2025 and pass feedback on to PRMT
FFAW	October 20, 2025	Email	FFAW replied to PRMT indicating commitment to remain engaged with the Project and provide feedback/comments on EA documents as they become available

To date, no concerns about the Project have been raised through engagement activities. PRMT will continue to meet with stakeholders and local communities as required throughout the life of the Project to address questions or key issues. This includes quarterly updates through the local chambers of commerce, multiple annual engagements with the Town of Baie Verte, participation in regional public events, such as the annual Baie Verte mining conference. Information on PRMT and its activities will also be incorporated into SAI's existing website, Facebook page, and LinkedIn page. SAI maintains a public enquiry contact form on its website that is monitored regularly. Concerns or questions raised through this contact form are addressed as they arise. To date, no concerns of note have been raised with respect to the existing quarry operation or operation of the marine terminal.

2.4 (4) INDIGENOUS ENGAGEMENT

PRMT acknowledges the role of Indigenous people in Canada and their contribution to knowledge regarding the environment. Through examining the history of Indigenous peoples in NL and engaging with communities, it has been established that Indigenous Organizations throughout NL have members residing in communities on the Baie Verte Peninsula. Indigenous groups on the Island of Newfoundland include the Qalipu Mi'kmaq First Nation (Qalipu), whose membership is distributed across 67 traditional Mi'kmaq communities and abroad, and the Miawpukek First Nation, with approximately 850 members living on-reserve in Conne River, located on the south coast of Newfoundland.

Previous quarry permits and approvals for neighbouring properties determined that there are no designated Indigenous lands in the Project area; however, the Qalipu First Nation may be affected by Project activities. The Qalipu is a Mi'kmaq First Nation established in 2011 under the *Indian Act*. Although the Qalipu First Nation does not have reserve land, it represents members across 67 communities in nine Electoral Wards throughout Western and Central Newfoundland. PRMT contacted the Qalipu First Nation by email to introduce the Project and invite participation in the EA process. Subsequently, PRMT presented an overview of the proposed project to the Qalipu Chief and Director of Industry, Energy and Technology. The presentation included information on the scope, objectives, and anticipated timeline of the project. The Qalipu First Nation acknowledged receipt of the information, and both parties agreed to continue communication as the Project progresses.

PRMT is not aware of Indigenous fishing activities in the approaches to or within the Project area in Pine Cove. As noted above, PRMT has contacted the Indigenous communities about the Project and the IPD / Registration Document and requested their input. Letters were sent to known Indigenous fishers with communal commercial fishing licences within the Northwest Atlantic Fisheries Organization (NAFO) division 3K area on October 1, 2025. The letter provided a brief Project description, regulatory process, and opportunities for feedback (Appendix A). At the time of preparation and submission of this document, responses to these letters have not been received by PRMT, and it is assumed that there are no specific concerns with respect to the proposed Project.

A summary of Indigenous engagement to date is provided in Table 2.2.

Table 2.2 Indigenous Engagement

Community	Date	Method	Details
Qalipu	January 28, 2025	Letter	Project introduction and request for feedback
Qalipu	March 24, 2025	Virtual Meeting	Overview of the proposed project including scope, objectives, and anticipated timeline of the project
Qalipu	October 1, 2025	Letter	Project follow up and request for feedback
Miawpukek First Nation	October 1, 2025	Letter	Project introduction and request for feedback

Table 2.2 Indigenous Engagement

Community	Date	Method	Details
Nunatsiavut Assembly	October 1, 2025	Letter	Project introduction and request for feedback
Innu First Nation	October 1, 2025	Letter	Project introduction and request for feedback
Nunatukavut Community Council	October 1, 2025	Letter	Project introduction and request for feedback

PRMT will notify the Indigenous groups when the IPD / Registration Document is submitted and provide the web link. PRMT is committed to ongoing engagement with Indigenous groups throughout the Project and will monitor the effectiveness of the various media used for Project communication. Should PRMT receive responses to the letters sent out on October 1, 2025, PRMT will follow-up to discuss and address feedback provided with the Indigenous groups. Future Indigenous engagement will also include outreach through social media and communication at major Project milestones.

2.5 REGIONAL AND STRATEGIC ASSESSMENTS

The purpose of Regional Assessments under the Act is to identify the interaction and cumulative effects of multiple projects within the geographic area of the Project.

2.5.1 (5) REGIONAL ASSESSMENTS

Regional assessments, as defined, refers to any study or plan pertaining to the Project that has been conducted or is currently being conducted within the regions where the Project is proposed. This includes regional assessments carried out under Section 92 or 93 of the IAA, as well as studies or plans undertaken by any jurisdiction or on behalf of an Indigenous governing body.

No regional assessments are being or have been carried out under section 92 or 93 of the IAA, nor by any jurisdiction including by or on behalf of an Indigenous governing body, that are relevant to the Project.

2.5.2 (6) STRATEGIC ASSESSMENTS

Under the IAA, strategic assessments are critical evaluations designed to address all encompassing issues such as climate change.

95 (1) The Minister may establish a committee — or authorize the Agency — to conduct an assessment of

(a) any Government of Canada policy, plan or program — proposed or existing — that is relevant to conducting impact assessments; or

(b) any issue that is relevant to conducting impact assessments of designated projects or of a class of designated projects.

95 (2) The Minister may deem any assessment that provides guidance on how Canada's commitments in respect of climate change should be considered in impact assessments and that is prepared by a federal authority and commenced before the day on which this Act comes into force to be an assessment conducted under this section.

Environment and Climate Change Canada (ECCC) has developed the strategic assessment of climate change under section 95 of IAA which is guided by two technical guides:

- Guidance on quantification of net greenhouse gas (GHG) emissions, impact on carbon sinks, mitigation measures, net-zero plan and upstream GHG assessment.
- Guidance on understanding and assessing how a project is resilient to and at risk from, both the current and future impacts of changing climate.

PRMT has evaluated GHG emissions as part of both construction and operations (Section 6.5). PRMT is committed to conducting the Project in a manner that reduces and manages the potential effects of GHG emissions throughout the life of the Project.

PRMT has implemented a number of operational upgrades and energy transition measures that have reduced its GHG emissions intensity (e.g., the port converted from diesel-generated power to grid power in 2018). These initiatives demonstrate PRMT's commitment to continual improvement and the integration of Environmental Social Governance principles into its operational strategy. Emissions performance will continue to be tracked and reported as part of the company's environmental management system, with further reductions targeted as new technologies and efficiencies are implemented.

3 PART B: PROJECT INFORMATION

In accordance with Schedule I of the *Information and Management of Time Limits Regulations* under the IAA, Part B provides documentation on the potential effects of the Project on various components, environmental and Indigenous peoples, including:

- (1) A statement of purpose of and need for the project, including and potential benefits.
- (2) The provisions in the schedule to the *Physical Activities Regulations* describing the project, in whole or in part. Indicate whether the designated project is a component of a larger project that is not listed in the Project List.
- (3) A list of all activities, infrastructure, permanent or temporary structures and physical works to be included in and associated with the construction, operations, decommissioning of the project.
- (4) An estimate of maximum production capacity of the project and a description of the production processes to be used.
- (5) The anticipated schedule for the project's construction, operations, decommissioning and abandonment, including any expansions of the project.
- (6) A list of potential:
 - a) Alternatives means that the proponent is considering and that are technically and economically feasible, including through the use of best available technologies; and,
 - b) Alternatives to the project that the proponent is considering and that are technically and economically feasible and directly related to the project.

3.1 (7) PURPOSE AND NEED FOR THE PROJECT

3.1.1 NEED FOR THE PROJECT

The Project is driven by the growing demand for high-quality construction aggregates and armourstone in both domestic and international markets. Through PRMT's existing marine facilities, SAI has been exporting crushed aggregate products since 2016, with a substantial portion of early shipments sourced from an approximately 10 million tonne stockpile of legacy waste rock from the former Anaconda Mining operations. As this stockpile approaches depletion, new supply sources are required to maintain existing markets and meet expanding global demand.

To support long-term operational viability, the Project will facilitate the export of aggregate material sourced from two newly developed quarries by SAI, located in close proximity to the marine terminal. These deposits offer two distinct types of high-grade rock material, each suited to specific civil engineering and construction applications. International clients impose strict quality control and assurance protocols, including material certification and source traceability. As such, cross-contamination between different rock types must be strictly avoided. This has created a logistical need for additional infrastructure to facilitate the physical segregation of materials throughout stockpiling, handling, and shipping operations.

Additionally, there are no equivalent export-capable port facilities in the region. Transporting aggregate or armourstone to alternate ports would result in substantial cost increases, elevated GHG emissions, added public safety risks due to extended trucking routes, and a loss of competitiveness. Without the proposed infrastructure expansion, continued operation and regional economic benefits tied to the export of these resources would be jeopardized.

FireFly's proposed Green Bay Ming Mine Project can utilize other permitted berths, but this expansion will provide more flexibility for SAI's other operational needs, as well as better accommodate export of mineral and metal products from regional mining projects, including concentrates, semi-refined, and fully refined materials.

3.1.2 PURPOSE OF THE PROJECT

To support long-term operational viability and export competitiveness, the Project will enable the efficient shipment of aggregate materials sourced from SAI's two newly developed quarries, located in close proximity to the Point Rousse marine terminal. These deposits contain two distinct high-quality rock types, each with specific applications in global civil engineering and coastal infrastructure markets. Given the stringent international standards imposed by end-users, including source traceability, materials certification, and quality assurance, strict physical segregation of the rock types throughout extraction, processing, stockpiling, and loading operations is essential. This operational requirement has created a need for expanded and purpose-built terminal infrastructure, including dedicated laydown areas and material handling systems that eliminate cross-contamination risks.

Critically, there are no comparable deep-water, export-capable port facilities within viable distance of the Baie Verte Peninsula. Alternative shipping routes would require substantial overland trucking to distant ports, resulting in higher operating costs, increased GHG emissions, and greater safety risks for the public due to elevated heavy truck traffic on local and regional roadways. Without the proposed infrastructure expansion, the viability of the aggregate export business, along with the associated economic benefits, regional employment, and investment, would be substantially compromised.

Although capacity currently exists to transport mineral products, the proposed terminal upgrades are also designed to accommodate mineral and metal products from regional mining projects, including concentrates, semi-refined, and fully refined materials, such as concentrate from FireFly's Green Bay Ming Mine Project, as well as anticipated future volumes from other critical and base mineral producers in the region. The enhanced infrastructure will reduce transportation bottlenecks and enable regional mineral developers to access international markets more efficiently. In doing so, the Project supports the objectives of the Government of Canada's Critical Minerals Strategy by unlocking shared-use infrastructure that enhances critical mineral supply chain capacity, improves logistics resilience, and lowers the emissions intensity of export operations.

Therefore, the purpose of the Project is to expand the existing marine terminal infrastructure to support increased export capacity for both crushed aggregate and armourstone products, and for mineral and metal products from regional mining projects, including concentrates, semi-refined, and fully refined materials. Specifically, the construction of a second berth will enable PRMT to meet SAI's customer demand for a broader range of aggregate sizes and types, while maintaining operational efficiency and compliance with international shipping standards. Although the port currently has capacity to ship mineral products, the expanded infrastructure will enhance PRMT's capacity to support future export opportunities, for FireFly and other regional mineral projects active or in development.

The second berth will allow simultaneous, or alternating, vessel loading of different products, mitigating delays associated with the extended loading times required for armourstone. More importantly, it will allow for complete segregation of product types at every stage of the logistics chain. This aligns with international quality control and traceability standards that prohibit cross-contamination between materials intended for distinct engineering uses.

PRMT's expansion is also aligned with SAI's long-term growth strategy, supporting sustainable resource development and enhancing the company's capacity to serve large-scale infrastructure and coastal protection projects throughout North America and abroad. The new berth will contribute directly to the region's economic development, sustain employment in quarrying and logistics, and improve the resilience of NL's export infrastructure.

Figure 3.1 shows the location of the Project in relation to the South Brook Quarry and the Point Rousse Quarry. Rock from these quarries may be used to supplement rock requirements to construct the marine facilities.

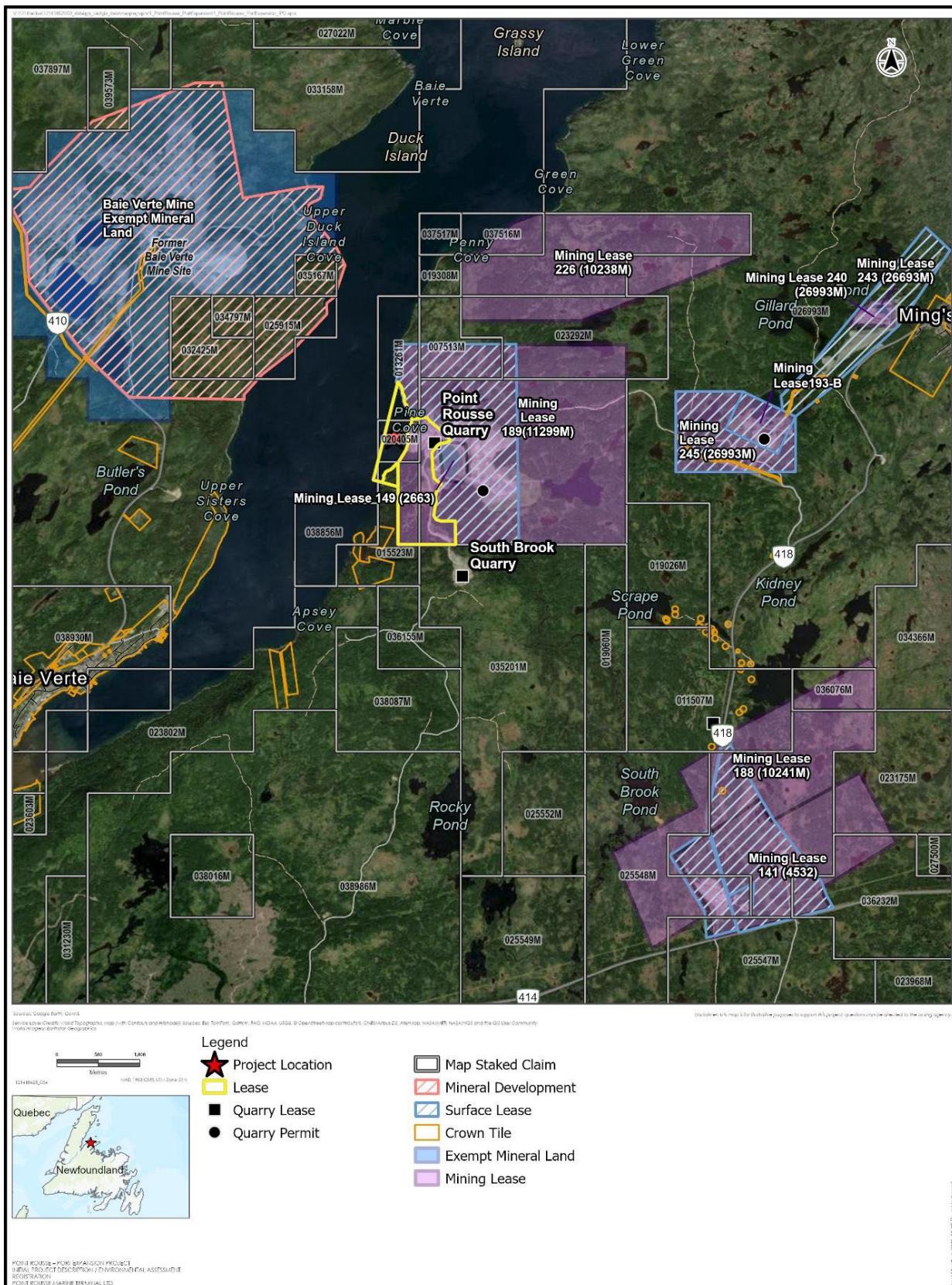


Figure 3.1 South Brook and Point Rousse Quarry Sites

The availability of high-quality, construction-grade aggregates in the Baie Verte area provides a unique opportunity to extend the region's industrial relevance while mitigating reliance on finite metal resources. PRMT is advancing this opportunity through the proposed expansion of its marine terminal at Point Rousse, which will support the long-term export of crushed aggregate and armourstone sourced from SAI newly developed quarry sites. The Project enables PRMT to meet the needs of large-scale infrastructure and coastal protection projects across domestic and international markets.

Importantly, the proposed port expansion is not only designed to serve SAI's operations but also to provide shared logistical infrastructure that can be used by other regional mining and industrial projects. This capacity-building initiative enhances the sustainability and economic resilience of the region by:

- Enhancing the use of existing marine assets and reducing under-use
- Attracting new industrial users seeking access to efficient export facilities
- Reducing transportation-related GHG emissions by eliminating the need to truck material to more distant ports
- Supporting a stable revenue base through diversified port usage and throughput fees

By facilitating multi-user access and improving regional export capacity, the Project aligns with broader provincial and federal priorities related to economic development, trade infrastructure, and climate mitigation. The Project will not only extend the Baie Verte region's industrial legacy, but will position it as a strategically valuable logistics hub supporting NL's evolving resource economy.

3.2 (8) PROVISIONS IN THE PHYSICAL ACTIVITIES REGULATIONS

Physical Activities Regulations are specified under the IAA. The Project may be considered a designated physical activity under Section 53 of the *Physical Activities Regulations* which states:

53 *The expansion of an existing marine terminal, if the expansion requires the construction of a new berth designed to handle ships larger than 25 000 DWT and, if the berth is not a permanent structure in the water, the construction of a new permanent structure in the water.*

The Project involves the expansion of an existing marine terminal through the construction of a new permanent berth. The berth is designed to accommodate vessels currently visiting the site, which are approximately 60,000 deadweight tonnes (DWT), and will have the capacity to handle vessels up to 80,000 DWT. As the proposed berth exceeds the 25,000 DWT threshold and constitutes a new permanent structure in the water, the Project meets the criteria outlined in Section 53. Therefore, Section 53 of the *Physical Activities Regulations* applies, and the Project is considered a designated project under the IAA. No other project activity considered for the Project is described in the *Physical Activities Regulations*.

This document has also been prepared in consultation with the EA Division of NLDECCC. The EA Division has advised PRMT that under Section 26 of the *Environmental Assessment Regulations*, the Project is considered a designated undertaking and is subject to registration under the NL EPA. A coordinated approach will be carried out between provincial and federal authorities to support a thorough review of the Project. Note that the Project proposes 3.4 hectares (ha) of infilling which is below the threshold of 5 ha to be considered a designated undertaking under Section 35 (f) of the *Environmental Assessment Regulations*.

Part III Designated Undertakings and Exceptions

26. Sections 27 to 52 shall not be construed to mean that registration under the Act is not required for an undertaking that is not referred to in those sections.

3.3 (9) DESCRIPTION OF PROJECT COMPONENTS AND ACTIVITIES

Subject to obtaining required regulatory approvals and permits, the Project design and construction is planned to occur over a multi-year construction phase, 2026/27 to meet scheduled quarry expansion and export schedules. The development of the marine facilities will follow similar construction and operation methods and activities as the existing berth and associated upland development, as described below.

Project activities include the development of the land side aggregate / armourstone / mineral and metal products (concentrates, semi-refined, and fully refined materials) storage and laydown areas, port access road, and the marine facilities. The marine facilities will consist of the following main components:

- Shoreline infilling and armourstone protection
- Rock filled access causeway
- Dock structure
- Barge

There are currently no plans to provide water and sewer services to the new port facilities; however, if these services are required in the future, this would be appropriately permitted. Transmission infrastructure at the existing marine terminal will be extend to the new berth. Project construction does not require dredging; however, blasting is anticipated for land side construction.

The existing marine terminal has been in operation since 2016 and has successfully exported more than of three million tonnes of aggregate products. Since the marine terminal is an established operating facility, essential marine services such as pilotage, navigation aids, and vessel traffic management are already in place and actively maintained through federal authorities, including Transport Canada, the Canadian Border Services Agency, and the Canadian Coast Guard. These services will continue to support operations through and beyond the proposed port expansion.

As the design phase advances, the following alternatives are being considered with respect to the dock structure and the barge:

- a fixed dock structure (steel piled dolphins) may be used in place of the proposed timber cribs
- a fixed (steel pile and concrete deck) structure may be used in place of the proposed barge

Therefore, both alternatives are considered in this document and are discussed further in Section 3.11. Project economics and functionality will determine the final Project expansion design.

3.4 PROJECT COMPONENTS

The Project has both land-based and marine-based components which are described below. Project components are illustrated in Figure 3.2. Detailed engineering drawings of the proposed expansion are also provided in Appendix B.

3.4.1 PORT ACCESS ROAD

A new port access road will be constructed that connects the existing access road to the proposed second berth area (Figure 3.2). Approximately 1.4 kilometres (km) of new, unpaved access road will be required, with a width of approximately 20 m. The road will be constructed using rockfill sourced from the waste rock storage areas and crushed stone produced at SAI's quarry will be used for road topping. The port access road does not cross waterbodies, and therefore culverts or bridges will not be required to accommodate the road.

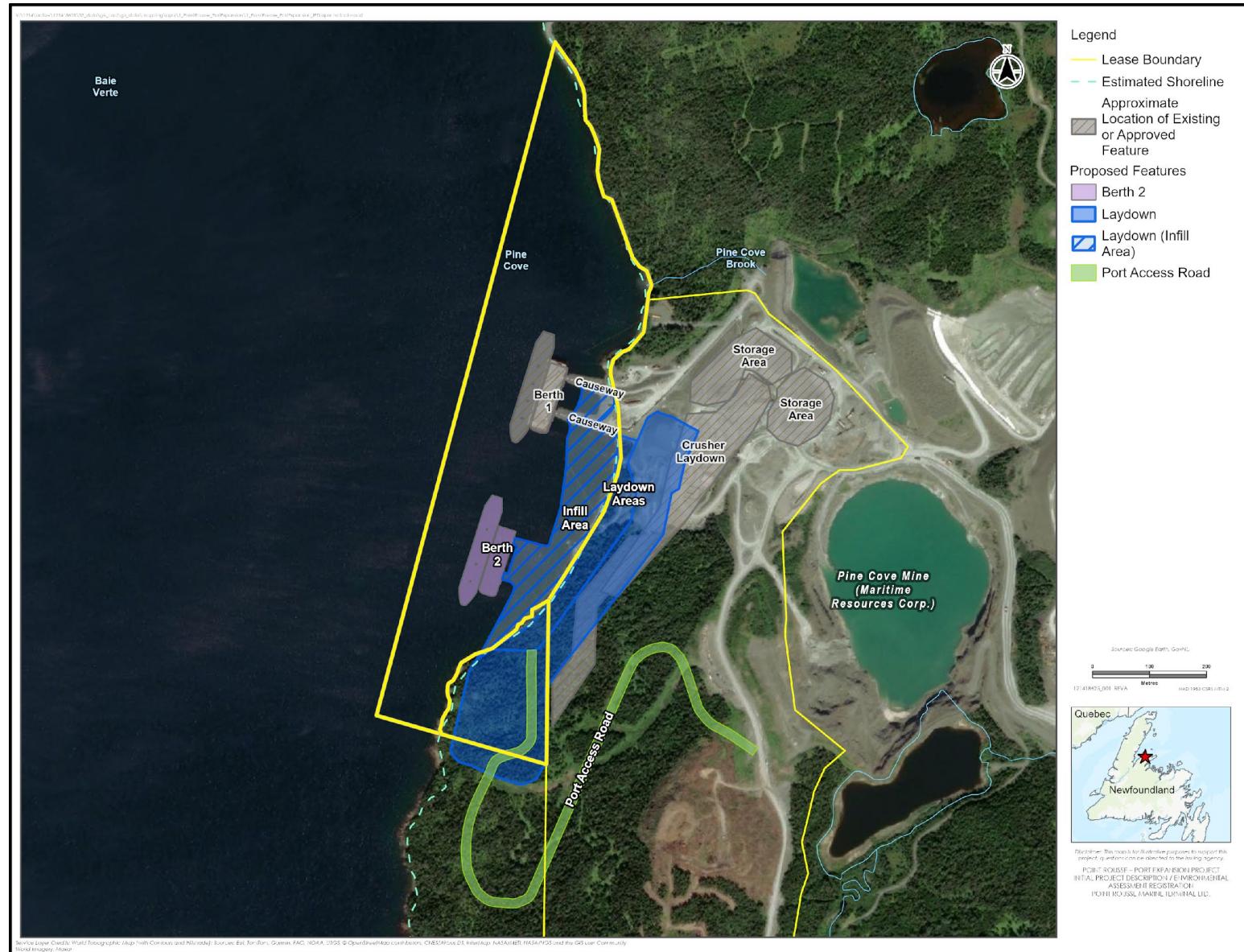


Figure 3.2 Project Components

3.4.2 STORAGE / LAYDOWN AREAS AND SHORELINE INFILLING

Storage and laydown areas will be constructed along the shoreline of the proposed terminal expansion to support both current and future operational needs (Figure 3.2). These areas will be used to store aggregate and armourstone, with additional space allocated for potential third-party use or future facility development, to store and move mineral and metal products (concentrates, semi-refined, and fully refined materials), such as a covered storage building and covered conveyors from the storage building to the berth for loading. Two onshore laydown areas will be established based on elevation which will provide a total of approximately 8.1 ha of laydown space. Stockpiles will be located within the laydown areas and will be constructed with an earthen base and will be sited to maintain a distance of at least 15 m from the high-water mark. Additional overland conveyors may be constructed to move aggregate to these stockpiles depending on the material being stored and/or to move aggregate from the stockpiles to the vessels.

Where stockpiled material consists of larger washed aggregate, the migration of fine particles from the designated area is expected to be minimal. As a precaution, standard erosion and sediment control measures will be implemented and routinely maintained at stockpile sites. These controls may include erosion prevention measures, such as diversion berms or ditches and settling ponds (if required) designed to redirect surface water flow around the stockpile location.

To further increase the available laydown area, a portion of the shoreline will be infilled to approximately the 5 m water depth mark. This infilling will use rock material produced from the construction of the storage area and access road and will serve to connect the original berth with the second proposed berth. Additionally, the space between the two existing causeways will be infilled. The total area to be infilled for the Project is approximately 3.4 ha, which is in addition to the 8.1 ha of designated shoreside laydown space. Once completed, the combined laydown and infill areas will provide approximately 11.5 ha of usable space for terminal operations. A map of the total area to be infilled is provided in Figure 3.2. The area that was previously infilled for the existing terminal is approximately 0.6 ha, 110 m in length.

The scope of the project includes the storage and movement of mineral and metal products from regional mining operations, encompassing a range of materials such as concentrates, semi-refined products, and fully refined metals. While mineral products, including concentrates, are expected to represent the largest share of storage and transport volumes, the facility is designed to accommodate various product types. Storage of mineral products, such as concentrate will be in a storage building located within the proposed laydown area (Figure 3.3). The preliminary estimate of total live storage capacity at the storage building is estimated to be 15,000 to 30,000 tonnes, which will be confirmed during detailed design. Mineral concentrates will be transferred from bulk trucks arriving from a mine site into a hopper system, which will be isolated to reduce direct contact with the truck tires. These materials will be stacked using a front-end loader within the storage building. The front-end loader will remain within the building and inventory will be stored in a weather-tight, fully enclosed building. Ventilation systems will be used to control exhaust fumes within the building, and a dust control system will be installed to control fugitive dust at conveyor transfer points. An area will be designated to allow for washdown of equipment, and the water will be collected and disposed at a licensed facility. Further information on loading of concentrate on ships is included in Section 3.6.2.

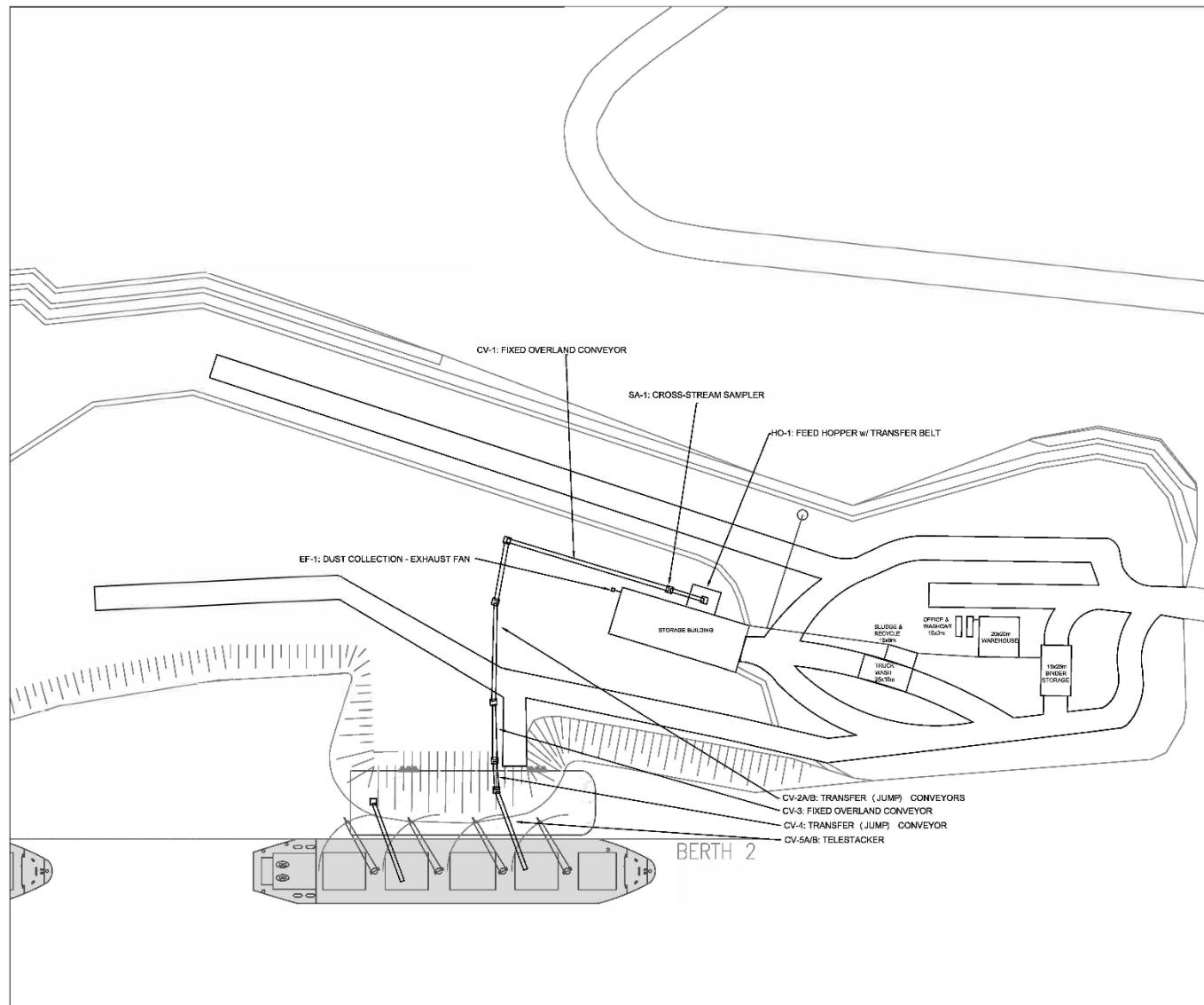


Figure 3.3 Preliminary Layout for Mineral Product Storage and Handling Infrastructure

3.4.3 ARMOURSTONE PROTECTION

Armourstone material will be placed along the front of the shoreline infilling area (Figure 3.2) to provide shoreline protection and erosion control. The material will be sourced from SAI's quarries.

3.4.4 ROCK FILLED ACCESS CAUSEWAY

Two causeways will be built, approximately 12 to 14 m wide, with a seabed footprint of approximately 30 m width and less than 100 m in length, each extending from the laydown area to a timber crib structure (Figure 3.2). They will consist of clean rock fill from the blasting operations. The side slopes will be protected with armourstone to prevent erosion and provide long-term stability.

3.4.5 DOCK STRUCTURE

The proposed dock structure will be designed to match the existing dock configuration with the capacity to handle vessels up to 80,000 DWT (Figure 3.2). The design includes:

- Two timber cribs, each measuring 16 m by 16 m, located at the ends of two rockfill approaches:
- Four shore-based concrete mooring bollards, each approximately 3 m by 3 m in size, to be constructed directly on bedrock.

PRMT is considering alternative design options for the installation of the second berth. Specifically, the use of steel piling and concrete pile caps will be reviewed as a potential replacement for the proposed timber crib structures. In addition, an option is being considered to replace the barge (Section 3.4.6) with a fixed structure composed of steel piles and a concrete deck. Both alternatives would require pile driving activities and involve the installation of deep foundation elements into the seabed to support infrastructure. Project alternatives are further discussed in Section 3.11.

3.4.6 BARGE

The existing barge structure on site is the Miss Nora G. Pearl, a dual-purpose flat deck docking barge with an approximate gross tonnage of 8,100. Measuring 117 m x 32 m, the Miss Nora G. Pearl is designed to accommodate marine vessels up to approximately 60,000 DWT. The barge required for this Project will follow similar configuration and specifications as the Miss Nora G. Pearl (but the new berth may accommodate vessels up to 80,000 DWT), allowing consistency with current operational capabilities and infrastructure.

3.5 CONSTRUCTION ACTIVITIES

The main activities to be completed during this phase include:

- site preparation (including vegetation removal, excavation, blasting, and earthworks for infrastructure development areas)
- construction of the port access road
- construction of a causeway
- construction of shoreline infilling and armourstone placement
- construction of the dock infrastructure
- commissioning

PRMT will execute the proposed works in an environmentally responsible and safe manner and will obtain necessary regulatory approvals and permits prior to initiating construction. Further details on specific construction and development activities are provided below. Mitigation to reduce environmental effects during construction are identified in Section 6.

3.5.1 VEGETATION REMOVAL

Vegetation removal will be the initial step in preparing the site for construction, including clearing trees and brush, grubbing, and salvaging topsoil from the laydown areas and the access road to the port. Clearing will follow provincial regulations and permit conditions. Activities will be scheduled outside bird breeding seasons, when possible, with environmental monitors inspecting areas if work is to occur during sensitive periods. Vegetation will be cut close to the ground (max stump height 15 centimetres) using mulchers, chainsaws, or other approved equipment. Bulldozers will only be used where no merchantable timber exists, and erosion risks are limited. Cleared material will be kept out of watercourses and piled above flood levels for disposal. Timber will be felled inward to protect standing trees.

Removed organic material and topsoil will be re-spread over inactive areas or stockpiled for future site rehabilitation, with locations recorded for reference. Stockpiles will be covered with soil to prevent erosion and nutrient loss.

3.5.2 EXCAVATION, BLASTING, AND EARTHWORKS

Following vegetation removal, excavation, blasting, and earthworks will be carried out to prepare the site for construction. These activities are necessary to shape the laydown area and access road. These activities are expected to take place over approximately six months.

Standard earthmoving procedures will be employed at the site, including drilling and blasting, and mechanical excavation. These activities will be limited to the footprint of what is necessary for construction of the laydown areas and port access road. A large portion of the material to be moved on the site consists of rock. There are lesser amounts of till that also need to be excavated. Glacial till can be excavated using conventional mechanical means including excavators, loaders

and dozers. Hard, sound rock (bedrock), which typically lies beneath the overburden, will require blasting and mechanical force to free it for excavation. Mass balance calculations will be performed to reduce the excavation and blasting activities.

At the request of PRMT, Dyno Nobel reviewed predictive modeling and historic data to assess potential impacts of blasting required for the Project on nearby infrastructure, including the tailings and settling pond at Maritime Resources. Data reviewed included predictive modeling of the size and scope of the proposed blasting as part of the Project, historic data from previous blasting operations conducted at the granite quarry, where similar conditions and blasting techniques were used, as well as predictive modeling of full-scale production blasting. See Appendix C for the details of the assessment conducted by Dyno Nobel.

Dyno Nobel has concluded that vibration levels decrease substantially with distance. Even under full-scale production conditions and at the upper limits of confinement, vibration levels at 600 m are predicted to be approximately 4.6 mm/sec, which would be the equivalent of a loaded dump truck passing by a few meters away. Based on historical data and predictive modelling, the proposed blasting activities for the laydown area are not expected to have adverse impacts on nearby infrastructure or existing facilities. Blasting will be carried out by qualified personnel in accordance with applicable regulations and best practices, with seismograph monitoring to verify ground vibration levels during blasting operations.

No blasting will take place in the marine environment. Blasting will only occur during site preparation and will follow applicable permits and safety regulations. Explosives and auxiliary materials will be stored as stipulated in relevant legislation, PRMT Occupational Health and Safety standards, and in compliance with the construction permits.

Blasting activities will be co-ordinated with ongoing quarry activities and scheduled to reduce the number of blasts required per week. To limit the seismic effect, blasting procedures will be developed. Time-delay blasting may be used as necessary to control debris scatter. During excavation activities, contractors will be required to limit the footprint of the excavation to the minimum required for the relevant installation. Where blasting activities will take place near a water body, blasting activities will follow the “Guidelines for the Use of Explosives in or Near Canadian Fisheries Waters” (Wright and Hopky 1999). Blasting will be conducted by a licenced 3rd party contractor.

Overburden stockpiles will be strategically placed to prevent siltation of the marine environment. Stored materials will be used for future site rehabilitation. As a precaution, standard erosion and sediment control measures will be implemented and routinely maintained at the stockpile site. These controls may include erosion prevention measures, such as diversion berms or ditches and settling ponds (if required) designed to redirect surface water flow around the stockpile location.

Once excavation and blasting are complete, earthworks will be undertaken to shape the terrain and support infrastructure development. This includes activities such as leveling ground to create stable platforms for construction, placing and compacting fill to raise low-lying areas and improve drainage, and constructing embankments and retaining structures to support heavy loads.

3.5.3 PORT ACCESS ROAD

Approximately 1.4 km of new, unpaved road will be required for the port access road, with a width of approximately 20 m. The port access road will be built to meet the loading and dimensional requirements of the largest design vehicle expected to use the road and the layout is designed to accommodate the grade of the site. Grubbing and organic material cleared from the access road footprint will be stockpiled separately to be used in the rehabilitation phase of the Project. Drainage ditches will be placed beyond the shoulders of the road to manage surface water runoff. No culverts or bridges will be required to accommodate the new port access road. Blasting may be required for access road construction.

3.5.4 CAUSEWAY, SHORELINE INFILLING, AND ARMOURSTONE PLACEMENT

The preferred construction technique for the causeway and infilling will consist of placing infill material in lifts along the causeway and shoreline alignment and compacting to the required percentage as determined from the final design requirements. Once the causeway and infilling reach a sufficient height above the water level, trucks and other heavy equipment will travel along their length and continue the exercise. As the causeway and infilling progress from shore, the core rock will be protected by a layer of filterstone and topped with a suitable size armourstone. Both the filterstone and armourstone will be transported to the site by trucks and placed using excavators or cranes depending on the filterstone/armourstone weight. Sediment control measures (e.g., sediment/silt curtains) will be in place during marine in-water construction works for the Project. Boats, barges or other vessels used to support in-water works will be inspected for sea worthiness prior to use. On-water operations will be suspended when weather conditions exceed vessel/equipment capabilities.

3.5.5 DOCK INFRASTRUCTURE

The current planned dock infrastructure includes two rockfill approaches, two crib structures, and four mooring bollards. The rockfill approaches will be constructed by placing clean rockfill in the water using heavy equipment, thereby reducing water disturbance. No end dumping will be used during construction. A floating silt fence will be installed to lessen the dispersion of suspended solids beyond the immediate area, if necessary. The cribs will be constructed of 0.25 m by 0.25 m timbers. The constructed cribs will be launched and sunk into position with ballast rock on a prepared rockfill mattress at the end of the rockfill approach areas. Once the cribs are firmly seated on the bottom, they will be built-up to the final elevation, leveled, and filled with ballast rock, ranging in size from 0.25 m – 0.50 m, placed by an excavator from a barge.

The mooring bollards will be constructed on and anchored to exposed bedrock along the shoreline adjacent to the dock structure. The approximately 3 m by 3 m concrete foundations for the steel mooring bollards will be poured directly onto the bedrock surface.

For the construction of the dock (i.e., rockfill approaches, timber cribs, mooring bollards, and placement of the barge), blasting and dredging in the marine environment will not be required.

PRMT is considering alternative design options for the installation of the second berth. Specifically, the use of steel piling and concrete pile caps will be reviewed as a potential replacement for the proposed timber crib structures. In addition, an option is being considered to replace the barge with a fixed structure composed of steel piles and a concrete deck. Both alternatives would require pile driving activities and involve the installation of deep foundation elements into the seabed to support infrastructure. Project alternatives are further discussed in Section 3.11.

3.5.6 COMMISSIONING

Following the completion of major construction activities, the next step will involve commissioning, addressing outstanding deficiencies, and demobilizing from the site. Once start-up issues have been resolved, the Project will transition into its operational phase, during which the expansion area will be opened for vessel berthing and the loading of materials.

3.6 OPERATION ACTIVITIES

The operation phase is anticipated to last over 30 years based on current estimates of available rock source at the two SAI quarries supplying the Project. The operational activities are centered around two main activities: aggregate and armourstone stockpiling, and aggregate and armourstone shipping. Mitigation to reduce environmental effects during operation is identified in Section 6.

3.6.1 AGGREGATE, ARMOURSTONE AND MINERAL PRODUCT STORAGE AND HANDLING

Finished products from the nearby quarry operations (e.g., aggregate, armourstone) or mineral and metal products encompassing a range of materials, such as concentrates, semi-refined products, and fully refined metals. from regional mineral producers will be transported to the storage areas via overland conveyor or haul trucks. No crushing or other secondary processing is planned as part of this Project.

The storage areas identified in Section 3.4.2 will be managed as flexible storage areas to accommodate export requirements. These products will be stockpiled according to size for later loading aboard the vessels (refer to Section 3.6.2). Standard erosion and sediment control measures will be implemented and monitored at the stockpiles, as noted in Section 3.4.2. As described in more details in Section 3.4.2, mineral products would be stored in a purpose-built storage building.

3.6.2 VESSEL LOADING AND VESSEL TRAFFIC

Ship loading of finished products at the marine terminal will be through a combination of covered conveyors and a mobile radial shiploader positioned on the barge. The conveyor will be fed from the port stockpiles to the mobile ship loader. The goal of the aggregate loading process is to load a vessel within a three-day period.

Due to its size, the armourstone cannot be handled by conveyor systems or a mobile shiploader. The armourstone will be loading in to skips that will be transported to the barge and lifted into the ship hold via the ship cranes or a mobile crane positioned on the barge. The goal of the armourstone loading process is to load a vessel within a one-week period.

For mineral products, loading of vessels will be completed using a covered conveyor system with fixed overland and mobile conveyor sections (Figure 3.3). During the vessel-loading operations, two loaders will be used for loading a hopper-conveyor system, such that the loading of the hopper is within the storage building and will connect to a fixed conveyor system from the building to the berth. The goal of the loading process is to load a vessel within a two-day period. The conveyor system leaving the storage building will be covered to mitigate potential dust emissions.

When the existing marine terminal received regulatory approval, a vessel traffic rate of one vessel per week was anticipated (i.e., approximately 50 vessels per year). Since 2016, PRMT has completed approximately 100 aggregate shipments from SAI's Point Rousse and South Brook quarries. Vessel traffic peaked in 2016 and 2017, with approximately 35 vessels per year, and has varied since then. Between 2016 and 2025, PRMT has shipped approximately 6 million tonnes of aggregate. With ongoing expansion and the potential for new clients and export opportunities beyond SAI's aggregate products, PRMT anticipates that there could be a future modest increase in shipments from the originally approved vessel traffic numbers, although a specific amount cannot be quantified at this time given uncertainty in the needs of future customers. At this time, it is assumed shipping will not occur in January and February due to ice conditions.

The current maximum size of vessel that can be accepted at the port is 60,000 DWT. The new berth will have the capacity to handle vessels up to 80,000 DWT.

Current users of the marine facility are expected to conduct operations in a safe, non-destructive, and environmentally-friendly manner. PRMT maintains a port manual, which provides information pertaining to regulations which must be followed by users of the facility and was developed based on the *Code of Safe Practice for Loading and Unloading of Bulk Carriers* (International Maritime Organization).

A pilotage station for approaching vessels is located outside of the bay (Figure 3.4). Pilotage is mandatory by PRMT and is contracted by third parties. When the carrier vessel does not have side-thrusters, a tugboat will be used to assist berthing and departure (Figure 3.5).



Figure 3.4 Location of Pilot Station and the Project



Figure 3.5 Tugboats in Use for Berthing and Departure

Boats, barges, or other vessels used to support in-water works are inspected for sea worthiness prior to use. On-water operations are suspended when weather conditions exceed vessel/equipment capabilities.

Emergency response procedures are maintained in the Port manual including procedures for personal injuries, ship-based fires, environmental emergencies, security threats, and significant weather events. Spill response procedures are outlined including immediate steps for containment, reporting procedures and deployment of onsite spill response equipment. Prior to operation of the Project, the manual will be reviewed and updated as needed to address activities associated with the additional berth.

3.7 REHABILITATION AND CLOSURE

Once the operational phase of the Project concludes, the facilities will be decommissioned, and rehabilitative measures will be implemented to help restore the site and surrounding areas to an environmentally appropriate condition. PRMT is committed to meeting applicable regulatory requirements in place at the time of rehabilitation and closure. This may include the removal or long-term management of Project components such as the causeway and shore infilling, subject to regulatory guidance and site-specific considerations. The timber cribs will be demolished and the barge will be towed from site.

At the time of closure, the marine habitat surrounding the causeways and shoreline will be well developed and closure activity, such as removal of these features, may have potentially harmful effects on the marine life established within the causeway and shoreline limits.

3.8 (10) PROJECT PRODUCTION CAPACITY AND PROCESSES

The Project will effectively double PRMT's export capacity and substantially increase available laydown and aggregate storage space. Central to the Project is the construction of a second marine berth, designed to accommodate increased export volumes and support the handling of a wider range of aggregate products and mineral and metal products encompassing a range of materials, such as concentrates, semi-refined products, and fully refined metals.

The primary operational rationale for the second berth is logistical efficiency. While the existing berth continues to serve high-volume crushed aggregate shipments, larger armourstone products—ranging from 1 to 8 tonnes—require substantially longer loading times. The additional berth will allow armourstone loading operations to occur without disrupting ongoing crushed aggregate exports, thereby maintaining continuity in existing supply chains and fulfilling diverse market requirements.

Aggregate and armourstone material will be sourced from two nearby SAI quarries: the South Brook Quarry and the Point Rousse Quarry. The South Brook Quarry is planned to be developed over six to seven distinct phases, each spanning approximately five years, resulting in an estimated operational life of 30 to 35 years. The Point Rousse Quarry, by contrast, is being developed to serve as a long-term source of high-quality rock aggregate intended to meet specific market demands that cannot be addressed by the South Brook deposit.

Production from the Point Rousse Quarry is anticipated to average approximately 750,000 cubic metres (or 2,000,000 tonnes) annually, based on current business projections. However, production volumes may fluctuate in response to evolving market demand, major contract awards, or changes in global infrastructure investment trends.

The new berth and associated laydown infrastructure will support efficient staging and loading of aggregate products from both quarry sites and will accommodate handling and export of mineral and metal products from regional mineral producers. This increased capacity will enhance PRMT's ability to meet growing international demand, particularly along the eastern seaboard of the United States and in emerging global markets. Additionally, the Project is expected to generate substantial economic benefits for the Baie Verte region, which is currently experiencing renewed industrial activity driven by mining and resource development projects.

3.9 (11) PROJECT SCHEDULE

The Project schedule is outlined in Table 3.1. The Project is expected to begin construction in Q2 2026, with completion anticipated by Q2 2027. However, the schedule remains contingent upon receiving release from the provincial EA process at the registration stage. It also assumes that the Project does not require an impact statement federally. Should further federal or provincial assessment be required, the start of the permitting, construction, and operation stages would be adjusted to align with completion of the EA process.

Table 3.1 Proposed Project Schedule and Milestones

Project Activity/Milestone	Start Date	Finish Date
Submission of IPD / Registration Document	December 2025	--
Provincial Registration Document Review / Release from EA (assuming 45-day review process)	December 2025	January 2026
Federal EA Review (Phase 1: Planning) / Approval (assuming 75-day process): <ul style="list-style-type: none"> 35-day public comment period coordinated with NLDECCC 10 days to prepare a Summary of Issues 20 days for PRMT to respond to Summary of Issues 10 days for IAAC to consider responses and decide if a further Impact Assessment is required	December 2025	February 2026
Permitting	March 2026	April 2026
Construction Phase	End of Q2 2026	Q2 2027
Operation Phase (35 yr quarry life)	Q3 2027	2062
Decommissioning & Abandonment	2062	2062

The design phase will occur simultaneously with the Project's submission of the IPD / Registration Document to streamline the Project timeline and condense the overall Project schedule. Once the design has advanced to a stage where major changes are not anticipated and EA approval has been obtained, PRMT will engage with regulatory authorities to procure the required federal, provincial, and municipal permits. Once the operational phase concludes, decommissioning and rehabilitation will take place in compliance with regulatory requirements at that time.

3.10 LABOUR FORCE AND OCCUPATIONS

The types of occupations anticipated for the construction and operation phases of the Project are consistent with those typically required for civil infrastructure development and port terminal operations. These roles correspond to various categories within the National Occupational Classification (NOC) system.

The construction phase of the Project is expected to span approximately six months and will be primarily supported by PRMT/SAI's existing workforce, which currently includes approximately 104 personnel (Table 3.2). By transitioning current staff into construction roles, PRMT will reduce the need for external hiring, requiring only an estimated 29 additional full-time equivalent (FTE) personnel. This approach not only reduces recruitment demands but also promotes workforce continuity and helps limit seasonal layoffs. Upon completion of construction, these 29 FTEs will be retained and transitioned into operational roles, increasing the total workforce supporting the Project to approximately 133 personnel. This strategy enables year-round employment and strengthens staff retention throughout the life of the Project.

A Gender, Equity, Diversity, and Inclusion Plan will be developed as part of the Project to promote inclusive participation and equitable employment opportunities. The Plan will detail measures to advance gender diversity, foster an inclusive work environment, and support local hiring throughout the phases of the Project. It will align with applicable federal and provincial guidelines, reflecting the Project's commitment to social sustainability and workforce equity.

As the final scope and design of the Project are confirmed, the specific number of workers needed for each occupation will become clearer. A preliminary overview of the expected job categories is provided in Table 3.2.

PRMT prioritizes local hiring and contracting, with the goal of increasing benefits to the local region in which it operates. Currently, 100% of direct employees at the marine terminal are residents of NL, and PRMT anticipates that the majority of additional employees required for Project construction and operation will also be residents of NL.

The FTEs presented in Table 3.2 represent direct employment associated with increased port activity under the proposed expansion. However, these roles account for only a portion of the broader regional employment and economic benefits anticipated from this infrastructure investment. The Baie Verte Peninsula is an active and growing mining corridor, with multiple projects underway or in development—including those led by SAI, FireFly (Green Bay Ming Mine Project), and New Found Gold Corp. (Point Rousse and Hammerdown Projects).

Community engagement with industry stakeholders and local organizations indicate that direct employment across mining operations in the region is expected to increase substantially, projected to reach between 1,200 and 1,500 FTEs within the next three to five years. These developments, when supported by expanded port capacity, will enable more efficient mineral exports, lower transportation bottlenecks, and improve operational reliability for regional proponents.

Moreover, this expansion is expected to catalyze indirect and induced employment across a wide range of sectors. Secondary FTEs will arise in mining support services, logistics, fabrication, environmental management, and technical trades. Tertiary FTEs will extend to retail, accommodations, food services, transportation, and related service industries. Based on industry-standard multipliers, each direct FTE in the mining and port logistics sector can generate up to 2.5 additional jobs in the broader regional economy.

The cumulative regional employment impact, factoring in mining-sector growth, could exceed 3,000 jobs over the next five years, which will be directly supported by the 29 direct port-related FTEs. This regional employment growth will enhance regional workforce stability, reduce seasonal layoff cycles, encourage youth retention in rural communities, and advance federal objectives under the Critical Minerals Strategy and by unlocking the full economic potential of Northern Newfoundland's mineral corridor through shared-use infrastructure investment.

Table 3.2 Construction and Operation Related Employment

Position Category	NOC Code	NOC Title	Currently Employed	Anticipated Additional Construction / Operational FTE's
Crusher / Wash Plant / Shiploading Ops	75110	Construction trades helpers and labourers	29	-
Millwright	72400	Construction Millwrights and Industrial Mechanics	2	-
Marine Facility Security Officer (MFSO)	64410	Security Guards and Related Security Service Occupations	1	-
Safety / Health & Safety Coordinator	22232	Occupational health and safety specialists	1	-
Welders	72106	Welders and related machine operators	3	-
Electrician	72201	Industrial electricians	3	2
Supervisor – Shiploading / Crusher / Quarry	82020	Supervisors, mining and quarrying	6	1
Materials Technicians	22101	Geological and mineral technologists and technicians	4	-
Parts and Inventory Coordinator	14403	Purchasing and inventory control workers	1	-
Management	00012	Senior managers - financial, communications and other business services	2	1
Heavy Equipment Operator (Dozer, Excavator, Grader)	73400	Heavy Equipment Operators	26	14
Surveyor / purchaser	21203	Land Surveyors	1	1
Welders	72106	Welders and related machine operators	1	1
Heavy Duty Equipment Technician (HDET)	72401	Heavy-Duty Equipment Mechanics	7	1
Carpenter	72013	Contractors and supervisors, carpentry trades	3	6
Supervisor – Quarry / Blasting Ops	82020	Supervisors, mining and quarrying	3	1
Administrative	13110	Administrative assistants	3	1
Janitorial / Facilities Support	65312	Janitors, caretakers and heavy-duty cleaners	2	-
Management	00012	Senior managers - financial, communications and other business services	5	-
Human Resources	10022	Human resources managers	1	-
Total HR Resources Allocated to PRMT				104
				29

3.11 (12) PROJECT ALTERNATIVES

3.11.1 ALTERNATIVE MEANS OF CARRYING OUT THE PROJECT

The original berth was constructed by building two rock filled causeways to the required water depth followed by the construction of two timber cribs to act as berth dolphins. A 400' x 100' barge was then moored at the timber cribs to act as a wharf structure and ship loading platform. Mooring bollards were constructed on the timber cribs and along the adjacent shoreline for the purposes of mooring the barge and ships.

This technique was simple in its design and construction and allowed the facilities to be designed and built within the required four-month period.

The second berth will follow the same design and construction techniques; however, during the detailed design phase, an alternate design using steel piling and concrete pile caps will be reviewed to replace the timber cribs. An option of replacing the barge with a fixed structure (steel piles and concrete deck) will also be reviewed. Cost and functionality will be considered in the final selection process.

3.11.1.1 PROJECT LOCATION

No alternative locations for the second berth have been considered. Proximity to the original berth, operational logistics, functionality and cost dictate that the second berth be constructed adjacent to the original. Additionally, there are no equivalent export-capable port facilities in the region. The second berth must be located adjacent to the existing berth to take advantage of existing port functions and the proximity of the two quarries that will supply the aggregate and armourstone materials. The aggregate processing plant consisting of crushers, screens, and conveyors is already established adjacent to the port site.

The aggregate rock is produced at the adjacent quarry locations and therefore economics dictate that the marine terminal should be located within proximity to the quarry site. Trucking of aggregate rock long distances to the port and similarly trucking finished aggregate long distances to alternate port sites would diminish the feasibility of producing aggregate products and substantially increase the project environmental footprint and operational costs (i.e., increased GHG emissions from trucking).

The position of the second berth in relation to the existing berth has been determined based on logistical consideration for vessel separation while at berth and bathymetry contours. Small refinements in the positioning of marine infrastructure may be required during detailed design.

3.11.2 ALTERNATIVES TO THE PROJECT

The expansion alternatives to the existing port facilities are limited due to environmental and economic considerations. The alternatives to the Project are:

- (1.) No-go option (status-quo) with continued shipping of aggregate products from the existing port facilities. Annual throughput will be limited to the capacity of the single berth. This option will restrict SAI's ability to grow its markets and expand its homegrown business and increase risk of potential contamination between products, which is not tolerated by clients requiring materials for specific engineering purposes.
- (2.) Use of an alternate port. This option is not feasible since the source aggregate is located in close proximity to the existing port. Trucking costs to alternate ports would be prohibitive and increase the environmental footprint of the SAI's quarries through increased GHG emissions.

With respect to aggregate export, the Project as proposed is the only feasible alternative from an economic perspective due to the relative proximity of the Project to the aggregate source and existing crushing operations. A second berth will also extend the longevity of SAI's operations in Baie Verte and increase employment opportunities.

4 PART C: LOCATION INFORMATION AND CONTACT

In accordance with Schedule I of *the Information and Management of Time Limits Regulations* under the IAA, Part C provides documentation on the potential effects of the Project on various components, environmental, and Indigenous peoples, including:

- (13a) Proposed geographic coordinates including, for linear development projects (e.g. pipelines, transmission lines), the proposed locations of major ancillary facilities that are integral to the project, and a description of the spatial boundaries of the proposed study corridor;
- (13b) Site maps produced at an appropriate scale, in order to determine the project's proposed general location and the spatial relationship of the project components;
- (13c) The legal description of land to be used for the project, including, if the land has already been acquired, the title, deed or document and any authorization relating to a water lot. The level of detail should be appropriate for the project type;
- (13d) The project's proximity to any permanent, seasonal or temporary residences and proximity to the nearest affected communities;
- (13e) The project's proximity to:
 - land used for traditional purposes by Indigenous peoples of Canada;
 - land in a reserve as defined in subsection 2(1) of the *Indian Act*;
 - First Nation land as defined in subsection 2(1) of the *First Nations Land Management Act*;
 - land that is subject to a comprehensive land claim agreement or a self-government
 - agreement; and
 - any other land set aside for the use and benefit of Indigenous peoples of Canada.
- (13f) The project's proximity to any federal lands.
- (14) A brief description of the physical and biological environment of the project's location, based on information that is available to the public.
- (15) A brief description of the health, social and economic context in the region where the project is located, based on information that is available to the public and/or derived from any engagement undertaken.

4.1 (13A) PROPOSED GEOGRAPHIC COORDINATES

The Project is in Pine Cove. Pine Cove is located on the east coast of the Baie Verte Peninsula in Notre Dame Bay in the electoral district of Baie Verte White Bay (Figure 1.1). The Project is adjacent to the existing marine terminal that was constructed in 2016, at coordinates 49 57 53 N and 56 08 18 W. The Pine Cove Property lies on the Point Rousse Peninsula, in the northern portion of the Baie Verte Peninsula, approximately 3 km northeast of the Town of Baie Verte in north central Newfoundland (See Figure 1.1). The Project site can be accessed through an existing road system developed during other previous and ongoing projects. Access to Pine Cove is by the existing La Scie Highway (Route 414) and the Ming's Bight Road (Route 418). Access to the Baie Verte Peninsula is via Route 410 (Dorset Trail) exiting the Trans-Canada Highway.

4.2 (13B) SITE MAPS

The general location of the Project is shown in Figure 1.1 and described above in Section 4.1. The location of Project components is provided in Figure 3.2.

4.3 (13C) LEGAL DESCRIPTION OF PROJECT AREA

The Project is located within the waters of Baie Verte Harbour, on the Baie Verte Peninsula. The largest community is the Town of Baie Verte located approximately 28 km from Baie Verte, along Routes 410-414-418 and the access road to the previous Anaconda mine site.

The Project is ideally located in a sheltered cove (Pine Cove) that provides excellent protection from wave and ice action.

PRMT has obtained the majority of the required land and water lot tenure from Crown Lands for the Project (Figure 4.1). The port access road and a small portion of the laydown area overlaps crown land that PRMT will need to make an application to the provincial government for the right to occupy.

4.4 (13D) PROJECT PROXIMITY TO RESIDENCES AND NEARBY COMMUNITIES

The Project is remote from local communities, and the general area has hosted ongoing industrial activities (e.g., the Pine Cove Mine) since circa.1960. The nearest communities are (Figure 4.2):

- **Town of Baie Verte:** 5 km southwest of Project site; population 1,311 (Statistics Canada. 2023)
- **Ming's Bight:** 7 km east of Project site; population 298 (Statistics Canada. 2023)

Several cabins and seasonal residences are located on the Baie Verte Peninsula. The nearest is approximately 1.5 km south of the Project in Apsey Cove, followed by additional cabins around Scrape Pond, located approximately 2.5 km southeast of the site.



Figure 4.1 Lease Boundaries for the Project

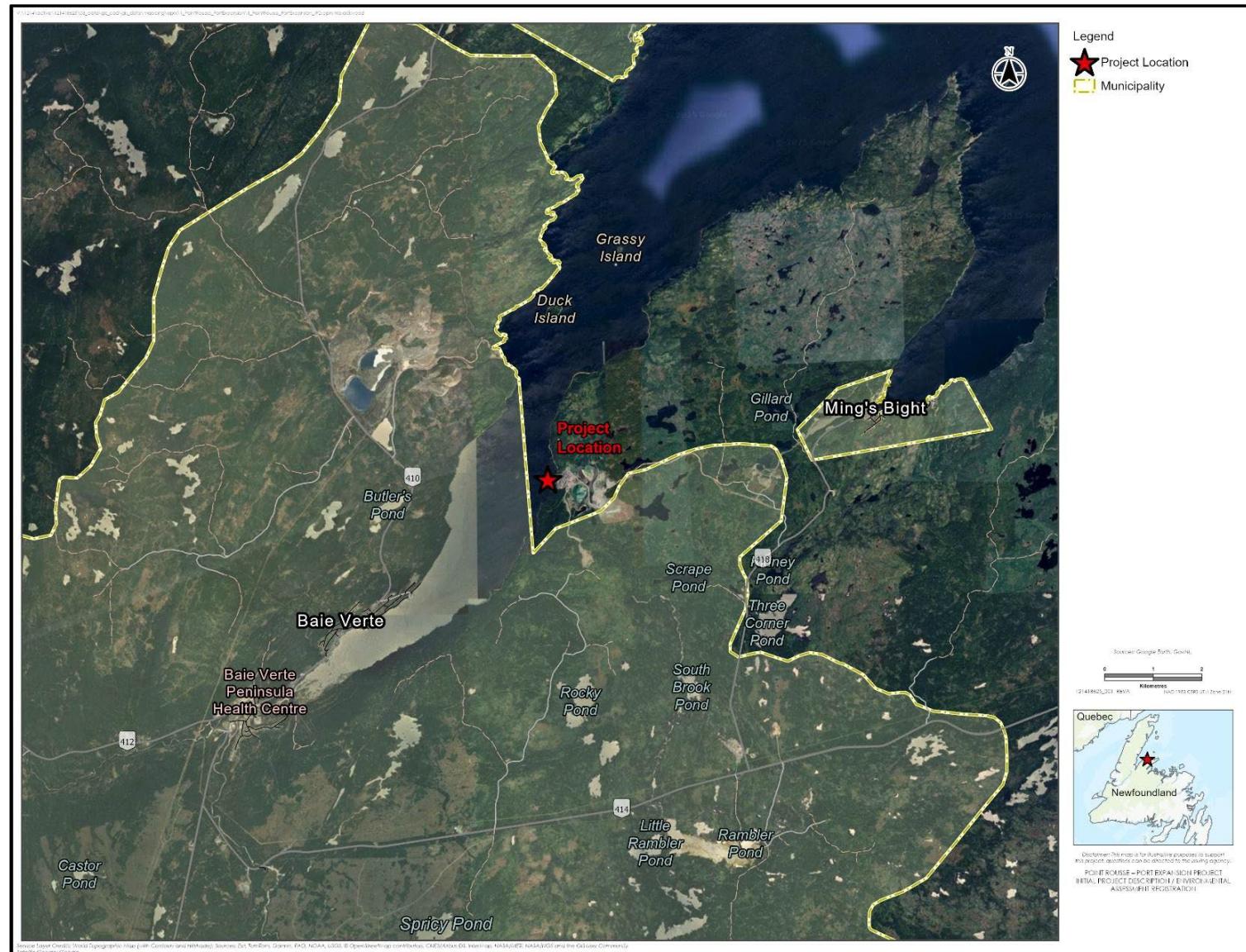


Figure 4.2 Municipal Boundaries of Adjacent Communities

4.5 (13E) PROJECT PROXIMITY TO LANDS USED BY INDIGENOUS PEOPLES

Both Indigenous and non-indigenous people live in the surrounding communities. The Indigenous peoples are members of the Qalipu First Nation and Miawpukek First Nation, as discussed in Section 2.4.

A 2020 Land Use and Aboriginal Traditional Knowledge study conducted by the Qalipu First Nation identified several higher intensity land use areas, which are frequently used for activities such as hunting, trapping, and gathering (Figure 4.3; Qalipu 2020). Notably, higher intensity land use areas were not identified near the Project. Given the widespread distribution of Qalipu members and the proximity of the Baie Verte Peninsula to traditional territories, it remains possible that individual community members may reside in or use the area for personal or cultural purposes.

The Miawpukek First Nation are located on Newfoundland's south coast, approximately 350 km away by highway. Miawpukek became a permanent community in the 1820's and became an established reserve in 1987 (Miawpukek First Nation 2023).

A Land and Resource Use Survey was conducted in 2025 in support of Firefly's Green Bay Ming Mine Project (FireFly 2025). The study area for the survey overlapped with the Project. Of the 418 participants, 1% (n=4) identified as a member of Qalipu First Nation and 0.2% (n=1) identified as a member of Miawpukek First Nation, suggesting a low Indigenous presence in the communities near the Project.

Further information on Food, Social, and Ceremonial (FSC) licences and communal commercial fishing licences in the marine environment in the region is provided in Section 4.7.2.3.

4.6 (13F) PROJECT PROXIMITY TO FEDERAL LANDS

There are no federally owned lands or facilities located within the Project footprint. The nearest federal asset would be the Small Crafts Harbours (SCH) wharf located in Ming's Bight (7 km). It is maintained by SCH and operated by the local harbour authority.

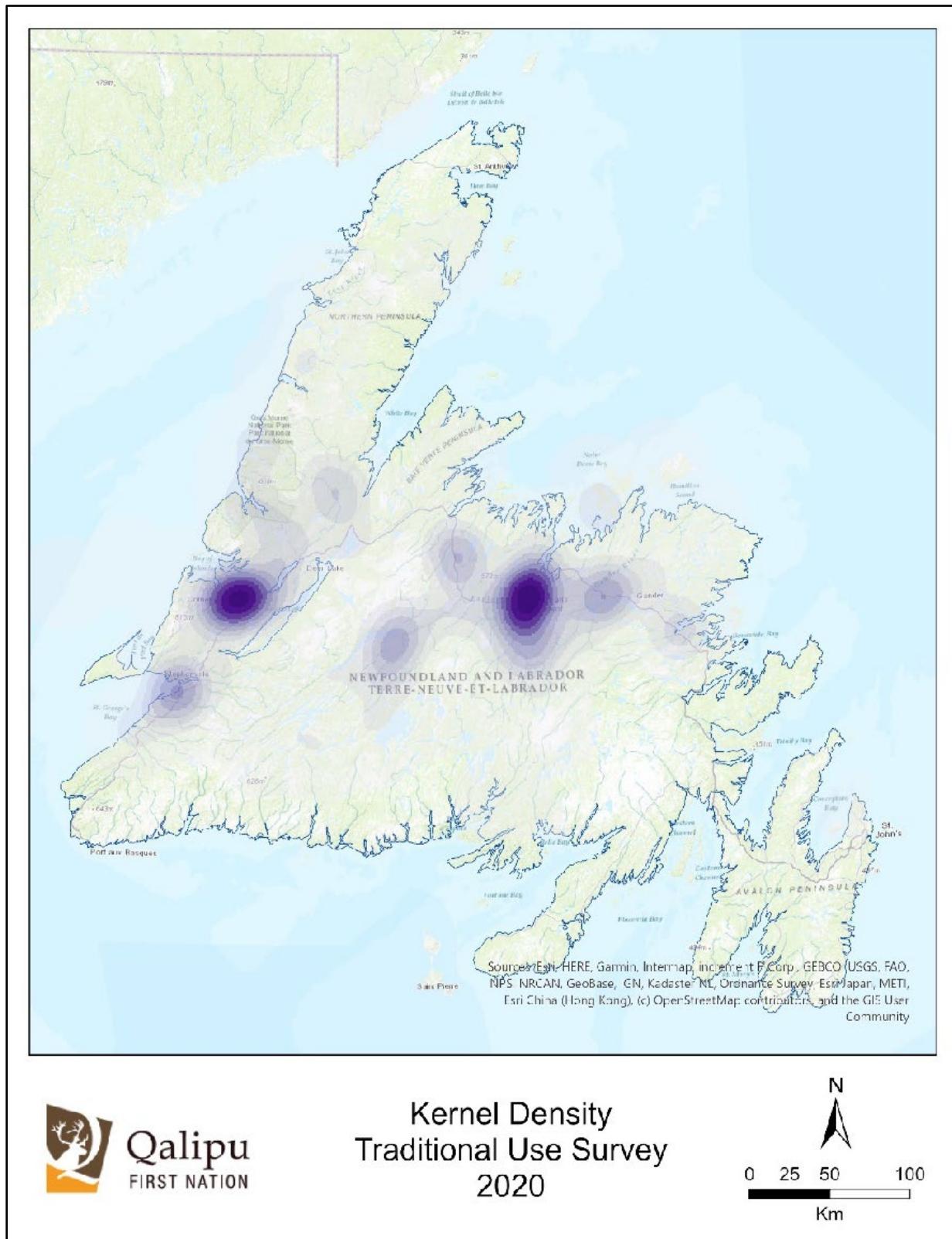


Figure 4.3 Qalipu Traditional Land Use Hotspots (Qalipu 2020)

4.7 (14) DESCRIPTION OF THE EXISTING NATURAL ENVIRONMENT

The physical, biological and socio-economic environments in the vicinity of the Project are described in the following sections. The descriptions and information presented were derived from other EAs conducted in the area, and other publicly available sources such as literature reviews, and government publications and reports.

Through the regulatory review of the draft IPD / Registration Document, the need for additional baseline information was identified. In completing this official submission, PRMT reviewed additional sources of publicly available information to update the description of the existing environment, including for species at risk and sensitive species, such as eelgrass.

As the Project will involve infilling of approximately 3.4 ha and construction of a causeway and berth, this disturbance footprint may affect benthic habitat, aquatic vegetation, and fish species. Note that no watercourse crossings are anticipated to be required for construction of the port access road. It is understood that Fisheries and Oceans Canada (DFO) may require updated baseline habitat information to evaluate potential impacts and the need for offsetting as part of the permitting process. PRMT will continue to engage with DFO on the specific information needed to satisfy DFO approval processes and will conduct needed surveys. It is understood that an experimental license may also be required to support baseline characterization.

4.7.1 PHYSICAL ENVIRONMENT

4.7.1.1 CLIMATE

The Project occurs between the boundary of the North-central subregion of the Central Newfoundland Forest ecoregion and North Shore ecoregion (Government of NL 2020). The climate in the vicinity of the Project is a general mix of the two ecoregions. The North-central subregion, which stretches across a large portion of the Island, is characterized by a continental climate, marked by the warmest summer temperatures and the lowest levels of precipitation found in Newfoundland. The subregion experiences warm, dry summers and occasional prolonged dry spells, contributing to a greater chance of forest fires (PAANL 2008a). The North Shore Forest ecoregion, which stretches approximately 20 km along Newfoundland's northeastern edge, is the driest ecoregion on the Island (PAANL 2008b). Influenced by its proximity to the Atlantic Ocean, it has relatively warm and dry summers but also faces common soil moisture deficiencies due to increased evaporation and limited precipitation. Wind exposure near the coast further impacts vegetation, leading to stunted growth, summers but areas benefit from more sheltered conditions.

Both the North-central subregion and the North Shore Forest ecoregion experience a seasonal climate typical of Newfoundland. Canadian Climate Normals 1991-2020 data from the nearest weather station to the Project (La Scie) is presented below Table 4.1 (ECCC 2025a).

Table 4.1 1991 to 2020 Canadian Climate Normals Data (La Scie)

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Daily Average (°C)	-7.9	-8.4	-5.1	0.1	4.9	10	15.3	15.7	11.6	6.1	0.8	-4.5
Extreme Daily Precipitation (mm)	42.2	76.3	37.3	53.6	76.4	69.2	65.6	51	52.4	84.9	63.9	47
Extreme Daily Precipitation (mm) Date (dd/mm/yyyy)	1/21/1991	2/6/2015	3/11/2017	4/27/1995	5/20/2017	6/3/1994	7/16/1993	8/19/2014	9/20/2004	10/10/2016	11/16/2004	12/24/1993
Extreme Snow Depth (cm)	150	168	198	150	80	44	0	0	0	13	33	123
Extreme Snow Depth (cm) Date (dd/mm/yyyy)	1/29/1995	2/1/1991	3/15/1993	4/1/1993	5/1/1995	6/4/1994	7/1/1991	8/1/1991	9/1/1991	10/26/1993	11/19/1991	12/31/1993

4.7.1.2 AIR AND NOISE QUALITY

Air quality monitoring in the Baie Verte region in 2016 and 2024 has shown that overall conditions are typically within acceptable limits, apart from occasional, exceedances of particulate matter near the Green Bay Ming Mine operated by FireFly (Firefly 2025), located approximately 5 km from the Project. Fluctuations are localized and not persistent, suggesting that air quality is generally stable with some temporary variations. Given the proximity of the Project to ongoing mining and quarrying activities at Pine Cove, air quality at the marine terminal is expected to be similar.

Baseline noise levels near the Project are expected to be typical for an industrial area and influenced by vessel loading activities at the existing terminal, along with activities at the adjacent SAI quarries and the nearby Pine Cove Gold Mine / Mill. Other occasional contributors to baseline noise levels would include vehicle traffic, and recreational use of boats or off-road vehicles. The Project and surrounding region is generally characterized by relatively variable topography and mixed terrain including bogs (wetlands) and forest, which attenuate noise propagation.

4.7.1.3 GEOLOGY, TERRAIN, AND SOILS

The Project is situated in Pine Cove, a crescent-shaped inlet located on the eastern side of the Baie Verte Peninsula. The surrounding coastline is notably rugged and irregular, dominated by steep slopes and prominent cliffs that define the area's topography (Anaconda 2016). There is very little beach between the tidemark and the abruptly rising back slope (Anaconda 2016). Moderate to steep slopes above Baie Verte rise to a maximum elevation of 120 m, averaging 60 to 70 m above sea level near the Project (Anaconda 2016). The terrain surrounding the Project site is generally rolling, with gradients over portions of the site ranging up to 22%. Bedrock outcrops are common throughout the region. The grey volcanic bedrock in the area is overlain with a thin layer (0-2.5 m) of unconsolidated material being comprised of peat, loose brown sand and gravel (Anaconda 2016). There are also local areas covered by poor sandy till overlying galcio-fluvial deposits and outwash deposits along some of the major river systems.

4.7.2 MARINE ENVIRONMENT

4.7.2.1 PHYSICAL CHARACTERISTICS AND WATER QUALITY

The Pine Cove watershed is located on the western shoreline of the Baie Verte Peninsula and flows are westerly direction and empty into Pine Cove in Baie Verte. Water levels and currents in Baie Verte are strongly influenced by local tides and wind conditions. The tides are mixed semi-diurnal tides (two peaks and two lows each day). The tidal range is typically 1.2-1.4 m during the spring tide, and 0.3-0.6 m during the neap tide. Table 4.2 provides tidal information in the Baie Verte area (Shoreline Aggregates Inc. 2025).

Table 4.2 Tidal Information in the Baie Verte Area

Location	Elevation above Chart Datum				
	Large Tides		Mean Tides		
Baie Verte	Highest High Water 1.5 m	Lower Low Water 0.0 m	Highest High Water 1.2 m	Lower Low Water 0.3 m	0.7 m

Baie Verte receives discharges from several watersheds, including the Southwest Brook watershed, which flows through the Town of Baie Verte, and the South Brook watershed, located to the south of the Project. There are minor inputs from the municipal wastewater system, local surface drainage (e.g., storm drains), and small-scale discharges from marine boats (Anaconda 2016).

Watersheds that drain into Baie Verte are influenced by historic mining activities and tailings areas. Asbestos particles are known to occur in the waters of Baie Verte as a result of the historical mining activities at the Baie Verte (Advocate) Asbestos Mine (Anaconda 2016). Down stream waterbodies of the historic Rambler Consolidated Tailings show signs of contamination, with low pH levels and elevated concentrations of metals such as arsenic, copper, lead, nickel, and zinc as a result of historic mining activities and tailings areas (GEMTEC 2019; Stantec 2013, 2016, 2019). In contrast, ponds and streams located upstream or up-gradient of these areas generally have neutral pH and undetectable levels of these metals (FireFly 2025). Discharge from the recently approved Green Bay Ming Mine Project will be into South Brook, but results of the assimilative capacity study indicate that background levels (i.e., the end of the mixing zone) are achieved prior to the South Brook discharge to the Baie Verte marine environment (FireFly 2025).

In 2016, a site reconnaissance was conducted on behalf of Anaconda Mining Inc. as part of an Environmental Effects Monitoring Program and included collection of marine water quality data. The concentration of metals measured in the marine water samples were 15 microgram per litre (ug/l) for aluminum, 35 ug/L for copper, and 35 ug/l for iron during the time of survey and are assumed to be representative of ambient conditions (Dillon Consulting 2016).

4.7.2.2 MARINE FISH AND FISH HABITAT

The Baie Verte peninsula separates Notre Dame Bay on the east side of the peninsula from White Bay on the west side. Studies in these waters indicate potential for a variety of marine wildlife (CPAWS 2009; PWGSC 2010). Marine plants with potential to occur in the area include eelgrass (*Zostera marina*), seaweed, and kelp. Invertebrates include jellyfish (*Aurelia aurita*), American lobster (*Homarus americanus*), and several crab, shrimp and mussel species. Basking shark (*Cetorhinus maximus*), blue shark (*Prionace glauca*), and porbeagle shark (*Lamna nasus*) are known to occur in the area, as are ground fish species including Atlantic cod (*Gadus morhua*), winter halibut (*Pseudopleuronectes americanus*), lumpfish (*Cyclopterus lumpus*) and turbot (*Scophthalmus maximus*). Atlantic wolffish (*Anarhichas lupus*), Northern wolffish (*Anarhichas denticulatus*), and spotted wolffish (*Anarhichas minor*) have the potential to occur in the area.

Marine mammals observed in the area include pilot (*Globicephala spp.*), common minke (*Balaenoptera acutorostrata*), and blue whales (*Balaenoptera musculus*), as well as harbour porpoise (*Phocoena Phocoena*) and Atlantic white-sided dolphins (*Lagenorhynchus acutus*). Leatherback sea turtles (*Dermochelys coriacea*) have also been documented.

Marine species reported in Baie Verte (Dowdring, *pers. comm.* as in Dillion Consulting 2016) include:

- Groundfish – Atlantic cod, winter flounder, lumpfish and turbot
- Pelagic fish – capelin (*Mallotus villosus*), American eel (*Anquilla rostra*), Atlantic herring (*Clupea harengus*), Atlantic mackerel (*Scomber scombrus*) and sea trout (*Salmo trutta*)
- Shellfish – soft-shelled clams (*Mya arenaria*), blue mussels (*Mytilus edulis*), scallops (*Placopecten sp.*), whelks (*Buccinum sp.*) and periwinkles (*Littorina littorea*)
- Crustaceans – American lobster, rock crab (*Cancer irroratus*), snow crab (*Chionoecetes opilio*) and toad crab (*Hyas spp.*)
- Seaweeds – rockweed (*Fucus distichus*), kelp (various species) and eelgrass
- Other – squid and sea urchin

The fish and fish habitat in the marine portion of the Project area was surveyed with drop camera during May 2016 prior to the construction of the existing berth. The survey was conducted in an area with water depths ranging from intertidal to about 20 m. Figure 4.4 shows the video survey area in relation to the existing berth and the proposed berth.

Marine sediment composition within the surveyed area was dominated by sand and gravel with patches of cobble, rubble, boulder, and shell debris. Seabed/habitat features throughout the surveyed area were generally uniform. Algal cover was not observed in large aggregations but was regularly observed in small patches. Filamentous brown algae (*Agarum sp.*), kelp species (*Saccharina longicurvis* and *Laminaria spp.*) and encrusting coralline algae (*Lithothamnion sp.*) were frequently observed. Notably, no eelgrass was observed in the surveyed area, but publicly available reports indicate eelgrass may be found in Baie Verte (DFO 2014).

Marine fauna observations within the surveyed area included small to medium encrusting sponges, patches of anemone species (*Metridium senile* and unidentified species), and soft corals patches (*Gersemia spp.*). Sea stars (*Asterias rubens*), brittle stars, and green sea urchins (*Strongylocentrotus droebachiensis*) were occasionally observed, and they were generally associated with algal patches. Further, sea scallops (*Placopecten magellanicus*), toad crab (*Hyas araneus*), Atlantic cunner (*Tautogolabrus adspersus*), and a number of sculpins were observed during the underwater video survey.

Select video frame grabs from footage at the existing berth area are provided in Figure 4.5. In summary, the flora and fauna observed during the drop camera survey in May 2016 were typical of inshore marine habitats in Newfoundland.

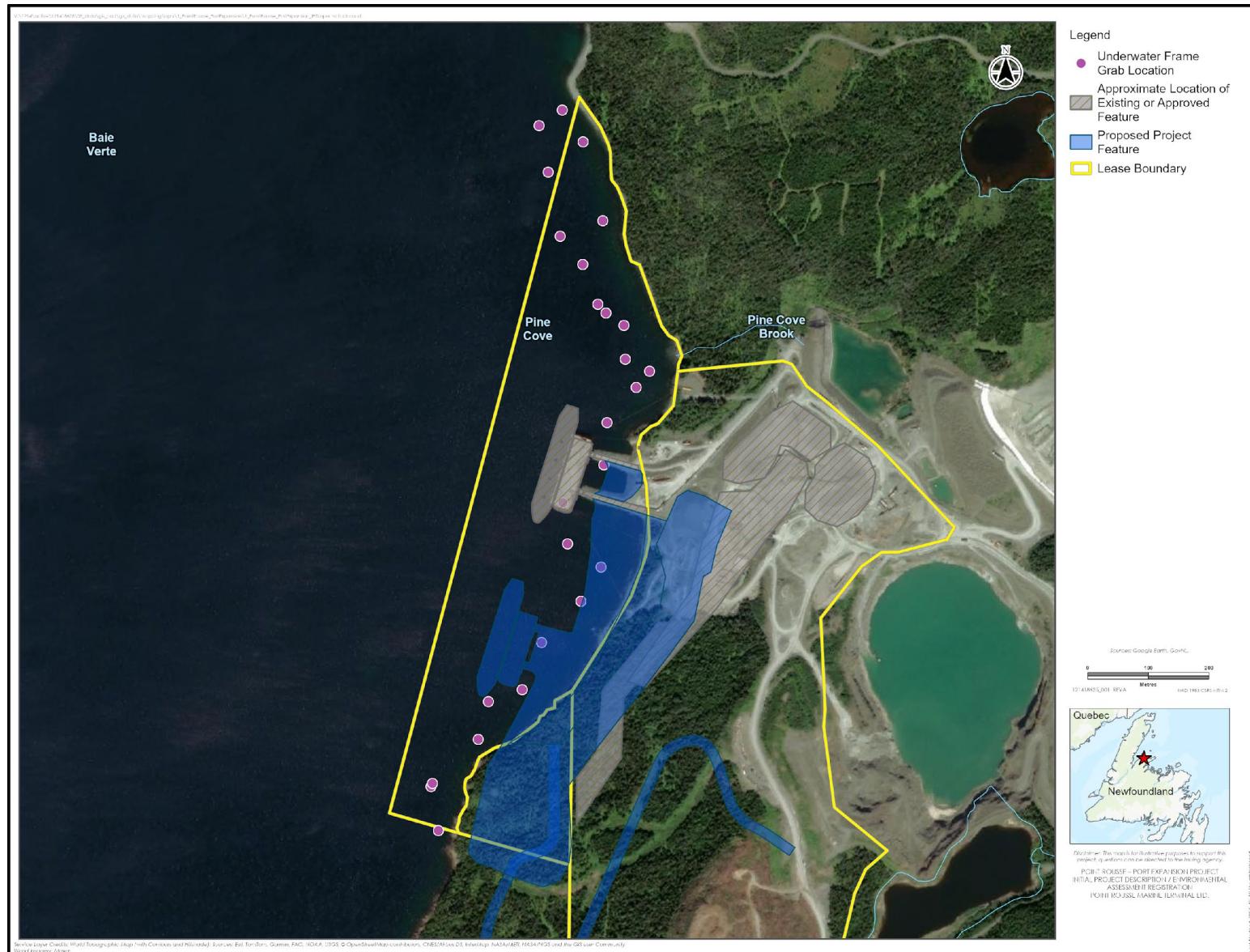


Figure 4.4 Location of Video Surveys Conducted in 2016

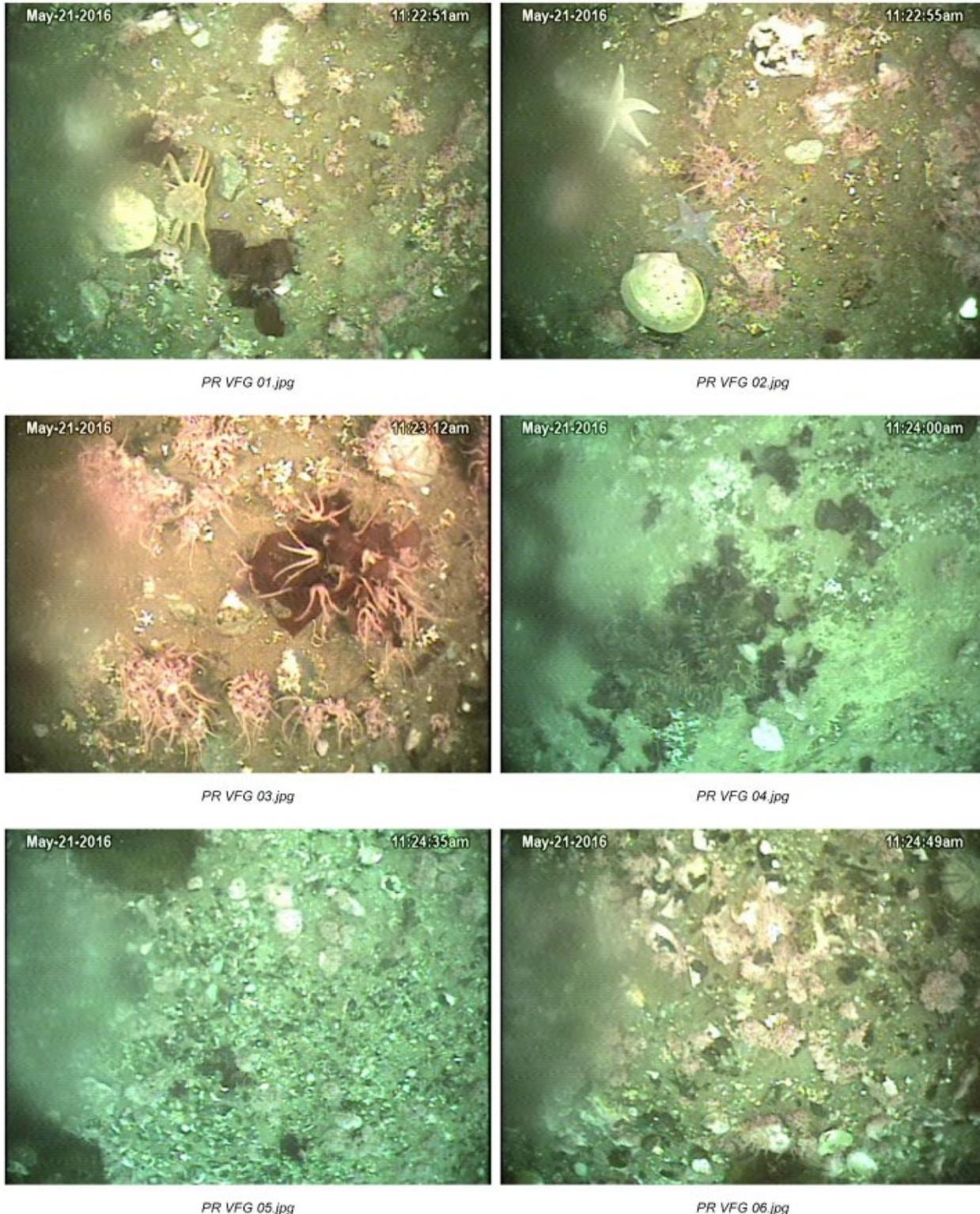


Figure 4.5 Select Video Frame Grabs from Footage at the Existing Berth Area

DFO's Species at Risk Mapping Tool (DFO 2025) was used on September 4, 2025, to identify possible marine species at risk in the area, including their critical habitats and residences. A list of identified species at risk is discussed in Section 4.7.4, Table 4.3. No critical habitats are present in the vicinity of the Project site. Ecologically and biologically significant areas or significant benthic areas were also not identified near the Project site.

4.7.2.3 EXISTING FISHERIES AND OTHER OCEAN USERS

Existing commercial fisheries data was sourced from the Canada Marine Planning Atlas - Atlantic portal (Government of Canada 2025). Commercial fisheries and landings near the Project area exist in Baie Verte in NAFO division 3K (Figure 4.6) for Atlantic halibut and Atlantic herring (Government of Canada 2025). Fisheries landing data for these two species were privacy screened and indicated less than five vessels' IDs, license IDs and fisher IDs. It is important to note that some species may be underrepresented in the database due to regional mapping permissions or partial georeferencing, lobster being a key example. Lobster is not represented in the available commercial fisheries database for NAFO Division 3K, and there are no known historical lobster fishing areas near the marine terminal. However, PRMT is aware of recent lobster fishing activity occurring in the vicinity of the Project.

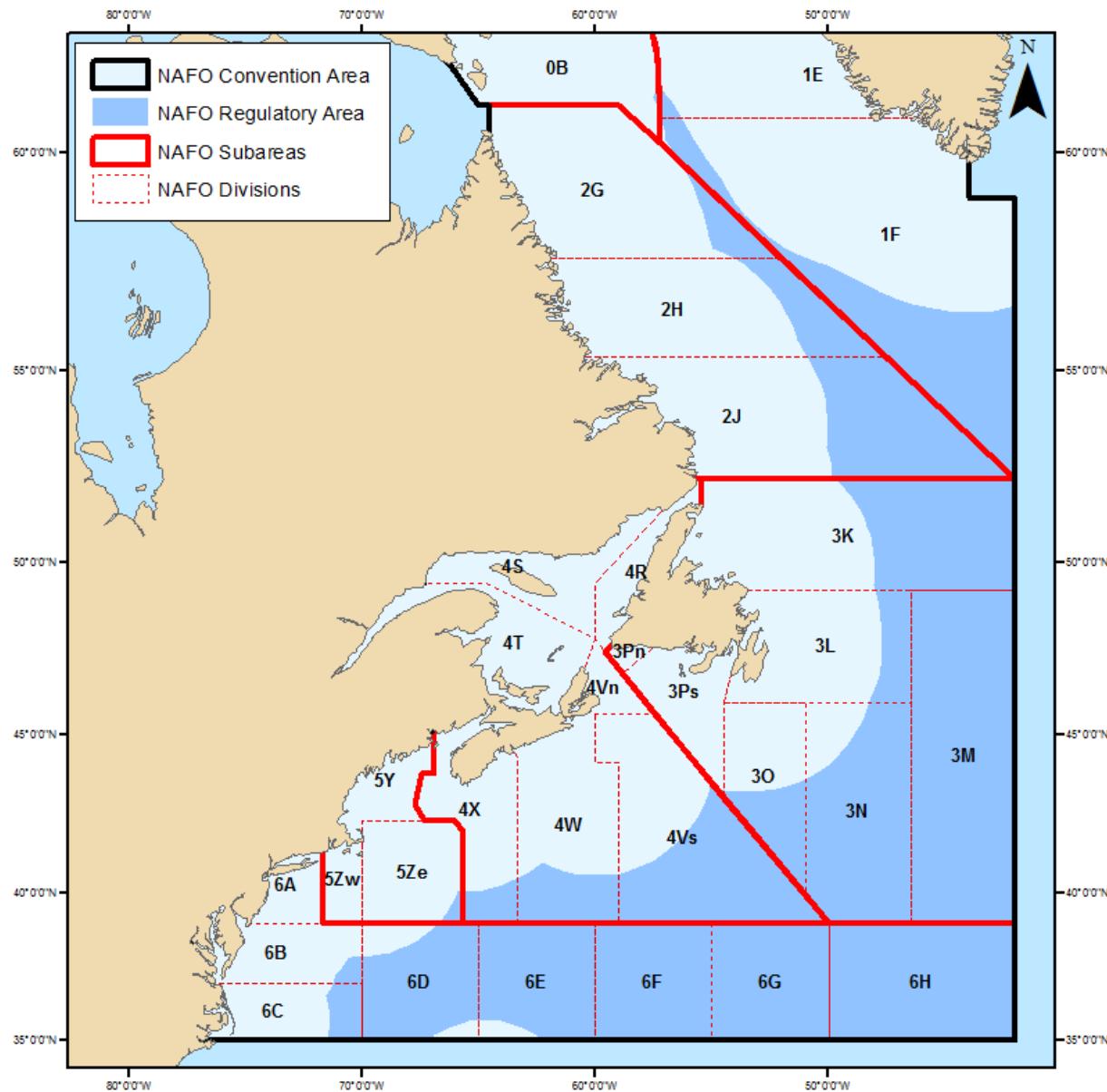


Figure 4.6 NAFO Divisions and Subareas (NAFO 2025)

Recreational fisheries in Baie Verte exists for Atlantic cod, capelin, mackerel, and squid (Dicks, pers. comm) and is managed by DFO. The fishery is open to residents, non-residents, and boat tour operators during specified dates for Atlantic cod, mackerel, and capelin, and year-around for squid. There are several restrictions put in place including the type of fishing gear and retention limits.

In Canada, FSC licences and communal commercial fishing licences serve distinct roles in supporting Indigenous fisheries. FSC licences are constitutionally protected under Section 35 of the *Constitution Act, 1982*, and designates an Indigenous Nation the right to harvest and catch what is necessary for themselves for FSC purposes (DFO 2022). These fisheries are non-commercial, and they may operate outside regular commercial seasons to meet community needs. According to DFO, there are no FSC licences currently issued for the NAFO division 3K area (Rowe, pers. comm.).

In contrast, communal commercial fishing licences are issued to Indigenous groups to enable participation in the commercial fishing industry (DFO 2024). These licences support economic development by allowing the sale of fish and providing employment opportunities within Indigenous communities. Both licence types are administered by DFO under the *Aboriginal Communal Fishing Licences Regulations*.

Since 2018, groundfish communal commercial licences within the NAFO Divisions 2+3KLMNO have been issued to the following Indigenous groups (DFO 2019):

- Nunatsiavut Government (NG)
- Innu Nation
- Nunatukavut Community Council (NCC)
- Miawpukek First Nation (MFN)
- Qalipu Mi'kmaq First Nation Band (QMFNB)

Currently, Qalipu holds communal commercial fishing licences in NAFO division 3K (Rowe, pers. comm.). Licences have been issued for mackerel, capelin, squid, lobster, herring, scallop, groundfish, snow crab, whelk, shrimp, and bait species.

At the time of writing, publicly available information regarding non-fisheries marine users in the vicinity of the Project is limited. Specific data on local, small-scale, or recreational marine activities in the Point Rousse area is sparse within public records, indicating limited use. While such use may exist, particularly by residents or informal community groups, it is not well-documented through public information and may only be accessible through direct community engagement or localized knowledge.

Marine traffic in the area surrounding the Project site appears to be relatively low to moderate, based on 2024 vessel density data (Government of Canada et al. 2025). The region experiences limited cargo vessel activity and only isolated zones reaching higher densities (Figure 4.7). When considering vessel types, including fishing boats, and recreational craft (Figure 4.8), the traffic remains generally sparse, with slightly elevated activity between the Project area and pilotage station.

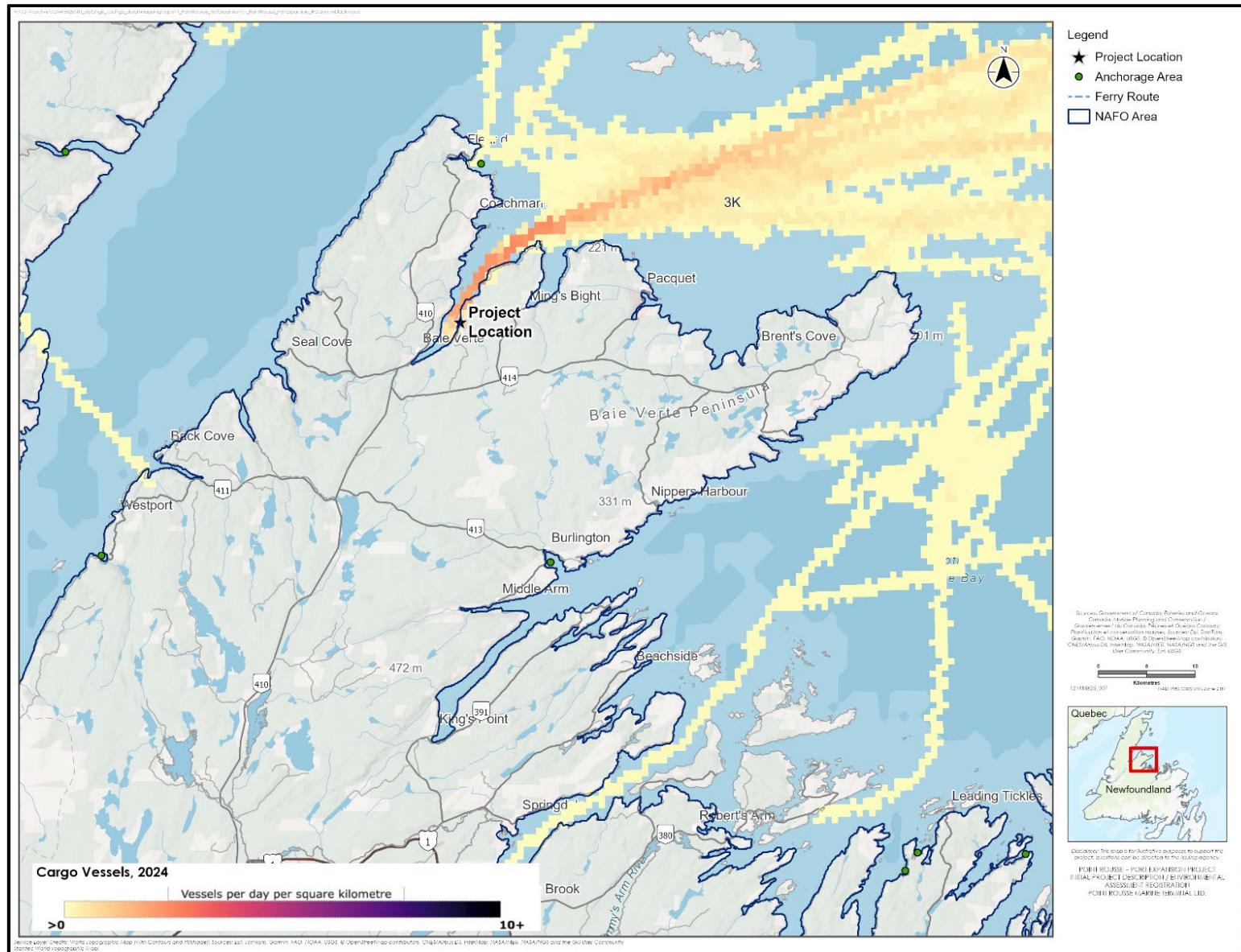


Figure 4.7 Cargo Vessel Activity Near the Project (2024)

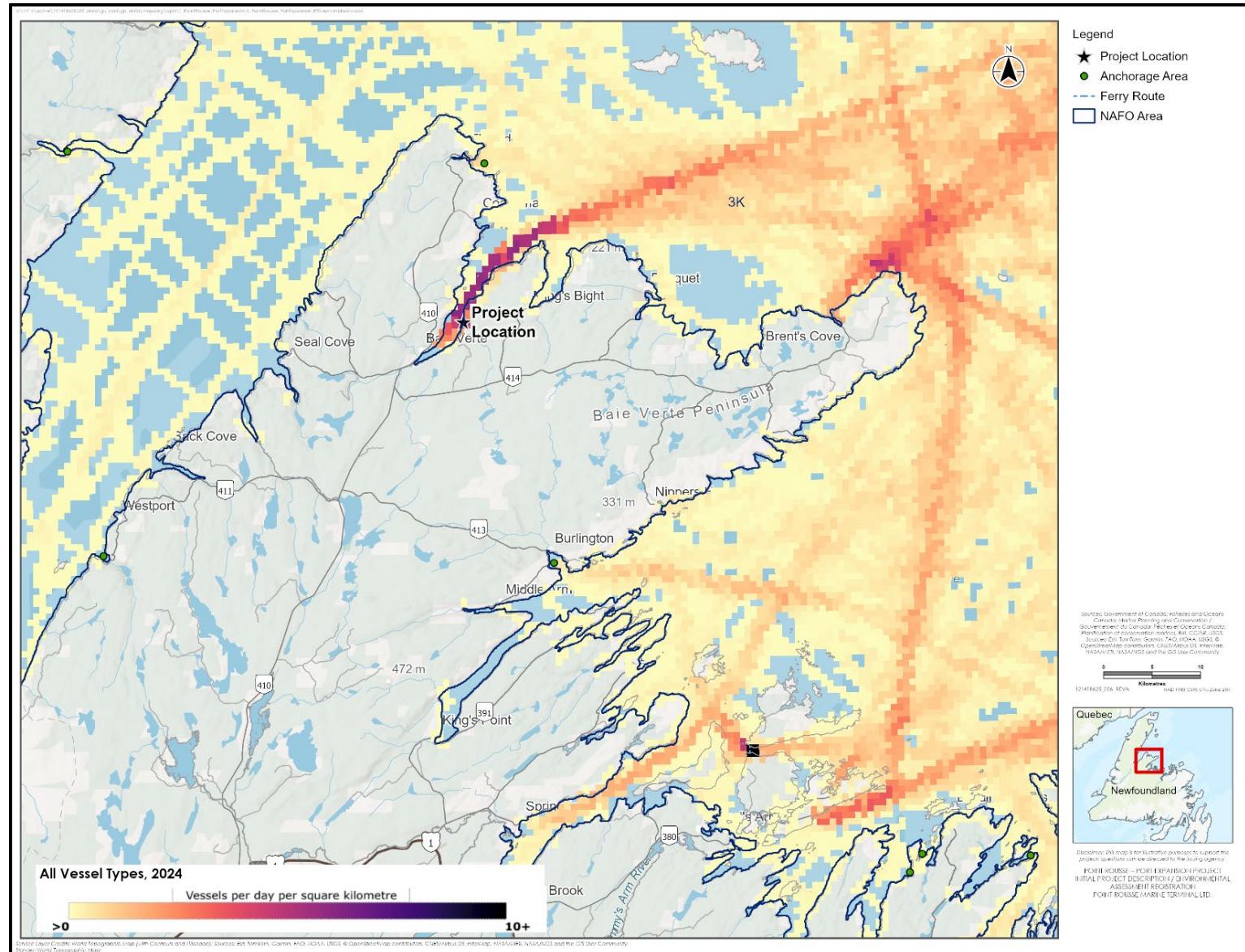


Figure 4.8 Total Vessel Activity Near the Project (2024)

4.7.3 TERRESTRIAL ENVIRONMENT

4.7.3.1 VEGETATION

The vegetation in the North Shore Forest and North-Central Subregion of the Central Newfoundland Forest is shaped by forest fires, climate, and coastal exposure. Both regions are dominated by black spruce and balsam fir, with frequent fire stands due to dry conditions. In the North Shore Forest, coastal vegetation is notably stunted and sparse, where wind exposure and poor soils limit growth (PAANL 2008b). Inland, forests are taller and more developed. Vegetation common to this region includes black spruce fire stands, balsam fir forests with an understory of sheep laurel or feathermoss, and mountain elder (PAANL 2008b). In contrast, the North-central Subregion features white birch and trembling aspen in burn-over areas and is the only place on the Island where red pine grows, thriving in sandy, nutrient-poor soils (PAANL 2008a). Coastal vegetation is less emphasized, but the region supports dense boreal forests with domed bogs and ground lichens in floodplains and estuaries.

Vegetation around the Project site consists of mature spruce and fir, largely cutover, with re-growth of alder, birch and willow (JWL 2007). The timber was largely harvested in the 1990s, and much of the remaining mature timber has been blown down due to exposure to wind (JWL 1992).

4.7.3.2 AQUATIC ECOSYSTEM

The Project is located within the Pine Cove watershed, which is approximately 1.6 km², though it has been substantially altered by mining and development operations. Prior to mining, there were two ponds at the centre of the Pine Cove Property. The remaining larger pond, Pine Cove Pond, is up to 10 m deep and has an area of approximately 4.5 ha. The original outflow from this pond flowed north approximately 400 m to Pasture Pond. Pasture Pond, now removed, was much shallower (less than 1.5 m deep) and was approximately 1.0 ha in area. Pine Cove Brook drained from Pasture Pond to the northwest and continued approximately 460 m to Pine Cove. In consultation with DFO, sections of Pine Cove Brook and Pasture Pond were altered as part of mine construction and a new habitat was constructed to compensate for fish habitat loss. The portion of Pine Cove Brook which flowed from Pine Cove Pond to Pasture Pond was relocated to flow south of Pine Cove Pond, with the water eventually reaching South Brook. Habitat monitoring of the compensated area ceased with the introduction of the new *Fisheries Act* in 2012.

Two other small ponds drain into Pine Cove Brook (downstream from the former Pasture Pond) from north of the site. As a part of the development of a new polishing pond for mining operations in the fall of 2015, a tributary was diverted approximately 100 m north before its inflow into Pine Cove Brook and around the newly built polishing pond. This diversion keeps the water supply flowing to the western section of Pine Cove Brook.

Freshwater habitat studies of the Pine Cove watershed were conducted in 1992, 2005, 2006 and 2007 (JWL 2007). The only fish species reported in the Pine Cove watershed during those studies was brook trout (*Salvelinus fontinalis*). Little spawning habitat was observed (JWL 1993). The cobble beach and steep gradient of Pine Cove precluded sea-run capability (JWL 1993; JWl 2007). A beaver pond was investigated in 2007 and determined to be fishless (JWL 2007). Monitoring of the habitat compensation area, immediately south of Pine Cove Pond, indicated presence of brook trout (Gray and Gautreau 2012).

4.7.3.3 WILDLIFE

Wildlife in the Pine Cove area of the Baie Verte Peninsula includes a range of terrestrial mammals typical of the region. Species that may occur near the Project include moose (*Alces alces*), American black bear (*Ursus americanus*), Canada lynx (*Lynx Canadensis*), coyote (*Canis latrans*), red fox (*Vulpes vulpes*), and various small mammals such as southern red-backed vole (*Myodes gapperi*), muskrat (*Ondatra zibethicus*), ermine (*Mustela erminea*), mink (*Neovison vison*), river otter (*Lontra canadensis*), snowshoe hare (*Lepus americanus*), red squirrel (*Tamiasciurus hudsonicus*), northern myotis (*Myotis septentrionalis*), and little brown myotis (*Myotis lucifugus*) (Meades 1990; Stantec 2022). Based on historical year-round distributions of caribou (*Rangifer tarandus*) on the Island of Newfoundland, the species is unlikely to be present in the area (Government of NL 2015).

A wide range of land, shore and marine birds occur in the Baie Verte area, including migratory bird species as defined in the *Migratory Birds Convention Act, 1994*. Commonly observed species include white-throated sparrow (*Zonotrichia albicollis*), ruby-crowned kinglet (*Corthylio calendula*), American robin (*Turdus migratorius*), magnolia warbler (*Setophaga magnolia*), and evening grosbeak (*Coccothraustes vespertinus*) (FireFly 2025; Stantec 2022). Additional passerines observed in the region include yellow-bellied flycatcher (*Empidonax flaviventris*), fox sparrow (*Passerella iliaca*), and tree swallow (*Tachycineta bicolor*) (FireFly 2025; Stantec 2022).

Waterbirds documented in the region include common loon (*Gavia immer*), American black duck (*Anas rubripes*), greater yellowlegs (*Tringa melanoleuca*), spotted sandpiper (*Actitis macularius*), and Wilson's snipe (*Gallinago delicata*), primarily occupying shoreline, open water, and wetland habitats (FireFly 2025; Stantec 2022). Raptors were notably scarce, with only American goshawk (*Accipiter atricapillus*) recorded during recent surveys, although osprey (*Pandion haliaetus*) and bald eagle (*Haliaeetus leucocephalus*) are known to occur regionally (FireFly 2025). The abundance of high-profile raptor species such as bald eagle and osprey is likely low in the area due to absence of suitable cliff-nesting habitat. The local forest was observed to be unsuitable for raptor nests due to stunted forest growth (JWL 1993).

Other avifauna included Spruce Grouse (*Canachites canadensis*), Canada Jay (*Perisoreus canadensis*), and Common Raven (*Corvus corax*), which are not protected under the *Migratory Birds Convention Act, 1994*.

4.7.4 SPECIES AT RISK

A Species at Risk (SAR) is defined as a species listed under Schedule 1 of the federal *Species at Risk Act* (SARA) as endangered, threatened, or special concern or under the Newfoundland and Labrador *Endangered Species Act* (NL ESA) as endangered, threatened, or vulnerable. These designations are informed by assessments from the Committee on the Status of Endangered Wildlife in Canada (COSEWIC), which evaluates the extinction risk of Canadian wildlife. COSEWIC recommendations are considered when updating the official SARA list.

Species of Conservation Concern (SOCC) are not formally listed under SARA or NL ESA but may be recommended for listing by COSEWIC or the provincial Species Status Advisory Committee. SOCC also include species identified as regionally rare or vulnerable by the Atlantic Canada Conservation Data Centre (AC CDC). AC CDC assigns conservation status ranks such as S1 (Critically Imperiled), S2 (Imperiled), S3 (Vulnerable) or combinations (e.g., S1S2). These rankings help guide conservation efforts for species with uncertain long-term sustainability, even if they are not officially listed.

The AC CDC data search for the Project returned one historical record of rare fauna and 0 historical records of rare flora within a 5 km radius of the Project site (AC CDC 2025). The identified species was the polar bear (*Ursus maritimus*), listed as special concern under SARA and vulnerable under NL ESA. This record was documented in 2023 in a wooded area near Baie Verte (Figure 4.7). Polar bears are known to occasionally visit Newfoundland via spring ice. AC CDC Expert Opinion Maps suggest that banded killifish (*Fundulus diaphanus*), ivory gulls (*Pagophila eburnea*), mountain holly fern (*Polystichum scopolinum*), red crossbills (*Loxia curvirostra percna*) and rusty blackbirds (*Euphagus carolinus*) are possible, while Newfoundland marten (*Martes americana atrata*), boreal felt lichen (*Erioderma pedicellatum*), and short-eared owls (*Asio flammeus*) are possible, but unlikely within a 5 km radius of the Project site. This area is also within the Barrow's goldeneye's (*Bucephala islandica*) range.

In addition to the AC CDC data search, a desktop review was undertaken to identify SAR that may be present within or near the Project area. Key sources included environmental assessments conducted for the Pointe Rousse Port Facility (Anaconda 2016) and other regional projects (FireFly 2025; Stantec 2022), as well as DFO's Species at Risk Mapping Tool (DFO 2025). The combined findings from the AC CDC search and the desktop review are presented in Table 4.3.

Some species listed under SARA or NL ESA may have designated critical habitat identified to support their recovery. This habitat includes areas essential for the species' survival and may receive legal protection to prevent destruction and enable targeted conservation and management efforts. There is no designated marine or terrestrial critical habitat identified in the vicinity of the Project area. There is also no Migratory Bird Sanctuaries or Important Bird Areas near the Project.

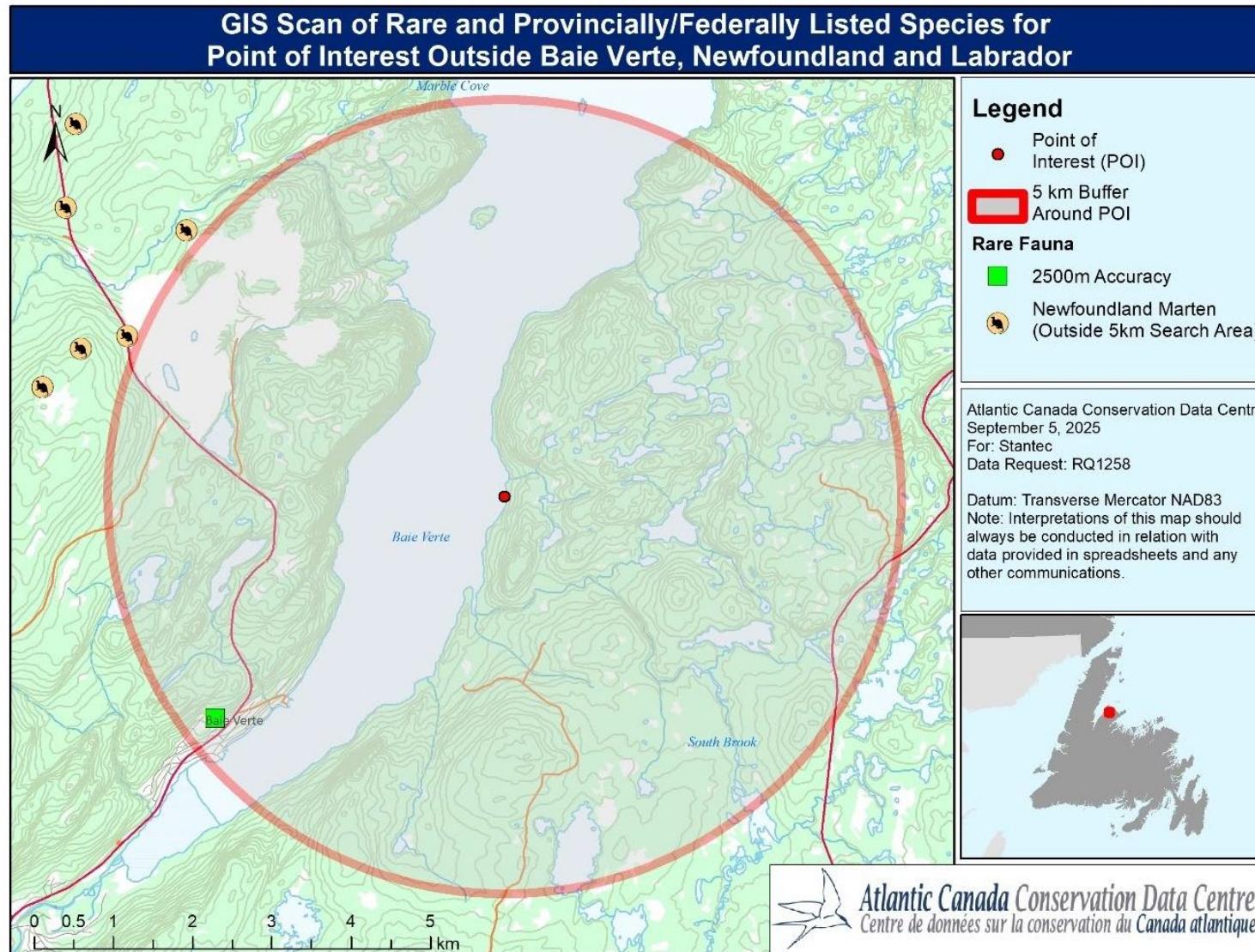


Figure 4.9 Rare and Provincially/Federally Listed Species Within a 5 km Radius of the Project (AC CDC 2025)

Table 4.3 Species at Risk with Potential to Occur in Vicinity of the Project

Common Name	Scientific Name	Committee on the Status of Endangered Wildlife in Canada (COSEWIC) Listed Status	Federal Listed Status (Species at Risk Act)	Provincial Listed Status (Endangered Species Act)	Habitat
Vegetation					
Mountain Holly Fern	<i>Polystichum scopulinum</i>	Threatened	Threatened, Schedule 1	Not listed	Grows on montane ultramafic (serpentine) rock outcrops, a type of rock formation that is relatively rare at the landscape scale. However, since the species is uncommon and geographically restricted, it is not thought to be threatened by human activities because it is located in an area that is difficult to access. They are known to occur by the Baie Verte asbestos mine (AC CDC 2025).
Boreal Felt Lichen (Boreal population)	<i>Erioderma pedicellatum</i>	Special Concern	Special Concern, Schedule 1	Vulnerable	Concentrated in two areas - the central Avalon Peninsula and Bay D'Espoir. Its distribution appears to be limited by climatic factors as it is found in cool, moist, and often foggy nature forests. It is frequently found near the edges of wetlands.
Red Pine	<i>Pinus resinosa</i>	Not Listed	Not Listed	Threatened	Has a limited distribution in the province, occurring on 22 sites, mainly within the Central Newfoundland Ecoregion, either in natural stands or plantations. Most often found on dry, well-drained upland sites with sandy, gravelly, or rocky soils.
Fish					
Banded Killifish (Newfoundland population)	<i>Fundulus diaphanus</i>	Special Concern	Special Concern, Schedule 1	Vulnerable	Only known from several locations on the west coast, northeast coast, and Burin Peninsula of Newfoundland. These locations represent the easternmost extent of this species' range and a unique Canadian population. Banded killifish are most often seen in the shallow areas of clear ponds with a muddy/sandy substrate, high detrital content, and submerged aquatic vegetation.
Spotted Wolffish	<i>Anarhichas minor</i>	Threatened	Threatened, Schedule 1	Not listed	Primarily found in cold waters off northeast Newfoundland, inhabiting open continental shelf and slope areas between 50 and 600 m deep, typically over sand or mud bottoms with nearby boulders.
Northern Wolffish	<i>Anarhichas denticulatus</i>	Threatened	Threatened, Schedule 1	Not Listed	Primarily found off northeast Newfoundland in cold, offshore waters below 5°C, typically at depths greater than 100 m on the continental shelf. Its habitat includes areas from the surface to 900 m.
White Shark (Atlantic population)	<i>Carcharodon carcharias</i>	Endangered	Endangered, Schedule 1	Not Listed	A seasonal migrant in Atlantic Canada, including Newfoundland, typically present in late summer and early fall. It inhabits a wide range of coastal and oceanic waters, predominantly found in depths between 50 and 500 m, and is most commonly found over the continental shelf in waters ranging from 14°C to 25°C.
Atlantic Cod (Newfoundland and Labrador population)	<i>Gadus morhua</i>	Endangered	Not on Schedule 1, under consideration for addition	Not listed	Inhabits the inshore and offshore waters from the northern tip of Labrador to eastern Newfoundland, including the Grand Banks.
American Eel	<i>Anguilla rostrata</i>	Threatened	Not on Schedule 1, under consideration for addition	Vulnerable	Spawn in the Sargasso Sea, in the southern North Atlantic Ocean, but grow and mature in our freshwater rivers, lakes, and estuaries. They have been found in many coastal rivers in Newfoundland and as far north as the English River in Labrador

Table 4.3 Species at Risk with Potential to Occur in Vicinity of the Project

Common Name	Scientific Name	Committee on the Status of Endangered Wildlife in Canada (COSEWIC) Listed Status	Federal Listed Status (Species at Risk Act)	Provincial Listed Status (Endangered Species Act)	Habitat
Avifauna					
Ivory Gull	<i>Pagophila eburnea</i>	Endangered	Endangered, Schedule 1	Endangered	Breed in the High Arctic and winter in the Arctic seas and along the Atlantic coast, including the coast of Newfoundland and Labrador. They are more rarely seen on the coast of the Great Northern Peninsula of Newfoundland and ashore.
Red Crossbill, <i>percna</i> subspecies	<i>Loxia curvirostra percna</i>	Threatened	Threatened, Schedule 1	Threatened	Associated with conifer forests, with the highest numbers of observations occurring in the older, mature forests of western Newfoundland.
Evening Grosbeak	<i>Coccothraustes vespertinus</i>	Special Concern	Special Concern, Schedule 1	Vulnerable	Breeding habitat includes forested areas dominated by fir (<i>Abies spp.</i>), spruce (<i>Picea spp.</i>), larch (<i>Larix spp.</i>), pine (<i>Pinus spp.</i>), and aspen (<i>Populus spp.</i>). During the non-breeding season, the species is nomadic, typically forming large flocks.
Olive-sided Flycatcher	<i>Contopus cooperi</i>	Special Concern	Special Concern, Schedule 1	Vulnerable	Breed in forest edge habitat characterized by tall coniferous or mixed wood trees and snags for perching, adjacent to open areas, wetlands, or disturbed forest.
Rusty Blackbird	<i>Euphagus carolinus</i>	Special Concern	Special Concern, Schedule 1	Vulnerable	Associated with forest wetlands, including slow-moving streams, peat bogs, sedge meadows, and ponds, dominated by conifer forest and scrub edges. In the winter, they occur in damp woodlands and cultivated fields.
Short-eared Owl	<i>Asio flammeus</i>	Threatened	Special Concern, Schedule 1	Threatened	Reported in tundra, coastal barrens, sand dune, field, and bog habitats. These habitats are particularly abundant on the west coast and Great Northern Peninsula of Newfoundland, and on the coastal barrens and above the treeline in Labrador, although virtually all coastal areas and nearshore islands are suitable habitat.
Barrow's Goldeneye	<i>Bucephala islandica</i>	Special Concern	Special Concern, Schedule 1	Vulnerable	NL is used by the Barrow's goldeneye as a molting and wintering area.
Terrestrial Mammals					
American Marten (Newfoundland population)	<i>Martes americana atrata</i>	Special Concern	Threatened, Schedule 1	Vulnerable	Typically found in old growth forests, specifically mature balsam fir. Have evolved in Newfoundland to be habitat generalists, aided in part by a release from predation, which allows them to occupy a naturally fragmented landscape.
Little Brown Myotis	<i>Myotis lucifigus</i>	Endangered	Endangered, Schedule 1	Endangered	Overwinters in cold, humid places like caves and underground mines in Newfoundland. In summer, females form maternity colonies, often in buildings or large trees. They forage over water and along forest edges, avoiding open fields.
Northern Myotis	<i>Myotis septentrionalis</i>	Endangered	Endangered, Schedule 1	Endangered	In Newfoundland, this forest-dwelling bat overwinters in cold, humid hibernacula like caves and mines. In summer, females form maternity colonies in large trees. It forages along forest edges and gaps, avoiding open fields.
Hoary Bat	<i>Lasiurus cinereus</i>	Endangered	Not on Schedule 1, under consideration for addition	Endangered	May be found in Newfoundland during summer and fall migration. It roosts tree foliage within forested areas and forages mainly open areas. It does not overwinter in Newfoundland.
Eastern Red Bat	<i>Lasiurus borealis</i>	Endangered	Not on Schedule 1, under consideration for addition	Endangered	This species is uncommon in Newfoundland but has been confirmed to be present. It roosts in tree foliage, especially in deciduous forests, and forages in open or semi-cluttered habitats. Like the Hoary Bat, it is migratory and does not overwinter in Newfoundland.
Silver-haired Bat	<i>Lasionycteris noctivagans</i>	Endangered	Not on Schedule 1, under consideration for addition	Endangered	Recently confirmed as a migratory species Newfoundland, this bat roosts in tree cavities or under loose bark. It forages along forest edges and in gaps. It is migratory, but some individuals may overwinter in milder parts of Canada, but is not known to overwinter in Newfoundland.

Table 4.3 Species at Risk with Potential to Occur in Vicinity of the Project

Common Name	Scientific Name	Committee on the Status of Endangered Wildlife in Canada (COSEWIC) Listed Status	Federal Listed Status (Species at Risk Act)	Provincial Listed Status (Endangered Species Act)	Habitat
Marine Mammals					
Blue Whale (Atlantic population)	<i>Balaenoptera musculus</i>	Endangered	Endangered, Schedule 1	Not Listed	Generally found in waters off eastern Canada: in the northern Gulf of St. Lawrence, off the coasts of Nova Scotia and Newfoundland, and in the Davis Strait.
Fin Whale (Atlantic population)	<i>Balaenoptera physalus</i>	Special Concern	Special Concern, Schedule 1	Not Listed	Inhabit coastal and oceanic waters year-round, with higher concentrations in summer near productive oceanic fronts and bathymetric features such as deep canyons and shelf edges.
North Atlantic Right Whale	<i>Eubalaena glacialis</i>	Endangered	Endangered, Schedule 1	Not Listed	Inhabit the temperate and sub-polar waters of the Atlantic. Migrate between their winter calving and feeding grounds in U.S. waters to rich feeding grounds in Atlantic Canada in the summer and fall.
Polar Bear	<i>Ursus maritimus</i>	Special Concern	Special Concern, Schedule 1	Vulnerable	Occasionally visit Newfoundland on spring ice but will move north again.
Marine Reptiles					
Leatherback Sea Turtle (Atlantic population)	<i>Dermochelys coriacea</i>	Endangered	Endangered, Schedule 1	Not Listed	Most abundant in Atlantic Canada from July through to the end of October, with the highest densities of turtles occurring on the Scotian Shelf and Slope, southern Gulf of St. Lawrence, and south coast of Newfoundland.

Sources: AC CDC 2025, Anaconda 2016; DFO 2025; ECCC 2016, FireFly 2025; *Endangered Species List Regulations*

4.8 (15) REGIONAL HEALTH, SOCIAL AND ECONOMIC CONTEXT

This section draws primarily from the Green Bay Ming Mine Project EA Registration Document (FireFly 2025), as the spatial scope of this assessment overlaps with PRMT's Project.

4.8.1 POPULATION

The Project is located in a rural area on the Baie Verte Peninsula, with the closest communities accessible by road being Baie Verte (population 1,311) and Ming's Bight (population 298), according to the 2021 census from Statistics Canada (Statistics Canada. 2023).

In 2021, the population of Economic Zone 11 which includes the Baie Verte Peninsula and Springdale area, was 12,650. This reflects a 4.5% decline from 2016, when the population was 13,250. During the same period, NL's overall population decreased by 1.8%, from 519,715 to 510,550. The median age in this zone was 55 years, notably higher than the provincial median age of 48. Census data shows that the population in the region has been steadily declining since 1986 (Community Accounts 2022).

4.8.2 LABOUR FORCE

In Economic Zone 11, the employment rate for individuals aged 15 and older is 36.2%, below the provincial average of 47.5%. The unemployment rate is 23%, notably higher than the provincial rate of 15.2%. The labour force in this zone consists of approximately 5,245 individuals. Men make up a slightly larger portion of the workforce, with 2,165 employed compared to 1,875 women. The most common occupations are in trades, transport, and equipment operation (915 workers), followed by sales and service roles (745 workers). Table 4.4 provides a breakdown of employment by occupation for Economic Zone 11.

Table 4.4 Economic Zone 11 - Employment by Occupation, 2021

Employment by Occupation	Male	Female	Total
Management occupations	10	20	30
Business, finance and administration occupations	90	260	350
Natural and applied sciences and related occupations	90	20	110
Health occupations	65	300	365
Occupations in education, law and social, community and government services	145	415	560
Occupations in art, culture, recreation and sport	10	25	30
Sales and service occupations	185	560	745
Trades, transport and equipment operators and related occupations	845	70	915
Natural resources, agriculture and related production occupations	530	100	630
Occupations in manufacturing and utilities	195	105	300

Source: Community Accounts 2022 as in Firefly 2025

4.8.3 INDUSTRIAL RESOURCES

The Baie Verte region has a well-established industrial legacy, particularly in mineral resource development, dating back to the mid-19th century. The Terra Nova Mine, a copper-sulfur operation, began production in the 1850s and remained active until 1916. In 1955, the discovery of asbestos led to the development of a major mining operation that operated intermittently until its permanent closure in 1995. Consolidated Rambler Mines Ltd., a copper-gold mine, also contributed substantially to the region's economy between 1964 and 1982. In recent years (since approximately 2016), the region has seen rejuvenation of the mining sector with development or reactivation of several sites including the Ming Mine site by Rambler Metals and Mining and now FireFly, as well as the on-going developments associated with the Point Rousse Project and Pine Cove Mill by Anaconda / Signal Gold and Maritime Resources, now owned by New Found Gold Corp.

4.8.4 LOCAL BUSINESSES AND SERVICES

In addition to the strong industrial industry in the Baie Verte Peninsula, the region supports a variety of small- to medium-sized enterprises. The hospitality sector includes seven hotels / motels and bed-and-breakfasts with a total of 77 rooms, including three accommodations options in Baie Verte (NL Tourism 2024). The Baie Verte Peninsula is in NL's Central Tourism Region. Between 2019 and 2023, the occupancy rate in the Central Region increased from 43% to 48% (Tourism Research Division 2024).

The region is served by an RCMP detachment in Baie Verte, staffed by five regular members (Adams 2017). While specific crime statistics for the detachment are not available, the Crime Severity Index for the broader Deer Lake RCMP District, which includes Baie Verte, increased from 37.1 in 2018 to 44.3 in 2021 (NL Statistics Agency 2022). Volunteer fire departments operate in Baie Verte (28 members), Springdale (30 members), and La Scie, which also has a newly constructed fire hall (La Scie Regional Fire Department 2024; Town of Baie Verte 2025; Town of Springdale 2019). Ambulance services are provided by Central Health, overseeing five private and eight community ambulance operators. Both Baie Verte and Springdale have two ambulances each, though staffing shortages mean not all are operational, and long response times have been reported (CBC News 2018; Hurley 2017).

The region is served by several schools, and the Baie Verte campus of the College of the North Atlantic plays a key role in post-secondary education (NL Department of Education 2024). This campus has approximately 70 students enrolled in full-time credit courses each semester, and around 300 students participate in continuing education evening classes. The campus also houses the Sedler Community Employment Corporation and the Advanced Education and Skills office, providing additional support for employment and training (College of the North Atlantic 2024).

Baie Verte serves as a regional hub, offering a range of these services and amenities including local businesses, government offices, accommodations, a health centre, recreational facilities, and educational institutions (Town of Baie Verte 2025).

4.8.5 UTILITIES

The Baie Verte-Green Bay Waste Management Region encompasses communities across the Baie Verte Peninsula and Green Bay South, stretching from Westport in the west to Brighton in the east. Waste in this region is transported from 12 local transfer stations to the Norris Arm Waste Management Facility—one of only two sites on the Island of Newfoundland authorized for final waste disposal (NLDMAE 2019). The Norris Arm facility is a lined landfill with leachate collection, originally designed with a 50-year lifespan when it opened in 2012. A second lined cell added in 2016 doubled its capacity, allowing it to accept waste from both the Central Region and the Western Regional Service Board (Central Regional Service Board 2019; Hickey 2010; NL Department of Municipal Affairs 2012).

The Town of Baie Verte relies on Southern Arm Pond for its drinking water, treated through a chlorination and filtration system with sufficient capacity to meet local demand. Despite occasional advisories, no current water quality ratings are available on the provincial water resources portal for the Town of Baie Verte (NLDECCC 2025). The town lacks a sewage treatment facility and uses four sewage outfalls (Uthman 2019).

4.8.6 LAND AND RESOURCE USE

Hunting (bear, moose, duck, muskrat, fox) and inland fishing (trout and salmon) activities are known to occur in the region. The Project is within Moose Management Area 14 - Baie Verte (NLDFFA 2023). Black bear, furbearers (e.g., snowshoe hare and mink), and other small mammals occur in the general Baie Verte area but are typically not observed given the mining activity adjacent to the Project (Anaconda 2016). Caribou (*Rangifer tarandus*) are not currently hunted on the Baie Verte Peninsula. The nearest Caribou Management Area is the Hampden Downs Newfoundland Caribou Management Area 78, approximately 50 km southwest of Baie Verte (Government of NL 2024). Wildlife species that are hunted in the province are managed by the NL Department of Forestry, Agriculture and Lands (NLDFAL)-Wildlife Division (large game, small game, and furbearers) through annual hunting and trapping guidelines and regulations, and harvest quotas.

There are no protected areas (e.g., provincial and national parks, wildlife, ecological and wilderness reserves) within the Project area. The nearest protected areas include the Flatwater Pond Provincial Park (approximately 24 km away), and Main River Waterway Provincial Park and Special Management Area (approximately 60 km away).

4.8.7 INDIGENOUS COMMUNITIES

Indigenous communities on the Island include the Miawpukek First Nation and the Qalipu Mi'kmaq First Nation. These communities, including traditional land and resource use, are further discussed in Sections 2.4 and 4.5.

4.8.8 HISTORICAL RESOURCES

A Historic Resources Overview Assessment examining the archaeological and cultural heritage potential across a broad regional Study Area on the Baie Verte Peninsula was conducted in 2024 in support of the EA for the Green Bay Ming Mine Project, which overlaps with the PRMT Project footprint (Stantec 2024). The Historic Resources Overview Assessment identified 67 registered archaeological sites across the region, including Pre-Contact and Historic Period sites near Fleur de Lys, Cow Cove, and Green Bay. No known historic resource sites have been recorded within the immediate area of the Project with the Provincial Archaeology Office. In addition, no historic resources were encountered during site preparation for the existing marine terminal or adjacent quarry and mining activities.

5 PART D: FEDERAL, PROVINCIAL, TERRITORIAL, INDIGENOUS AND MUNICIPAL INVOLVEMENT AND EFFECTS

In accordance with Schedule I of the *Information and Management of Time Limits Regulations* under the IAA, Part D provides documentation on the potential effects of the Project on various components, environmental and Indigenous peoples, including:

- (16) A description of any financial support that federal authorities are, or may be, providing to the project.
- (17) A list of any federal land that may be used for the purpose of carrying out the project.
- (18) A list of any jurisdictions that have powers, duties or functions in relation to an assessment of the project's environmental effects.
 - This may include permits, licenses, or other authorizations that may be required by federal authorities or other jurisdictions.
 - A list of any changes to the environment or to health, social or economic conditions that may occur in Canada that are directly linked or necessarily incidental to the involvement of a federal authority that would permit or enable the project to be carried out in whole or in part.

5.1 (16) FEDERAL FINANCIAL SUPPORT

The estimated cost of the port expansion is \$20 million (CAD). Funding for the Project will be from PRMT both directly and through off-take user agreements, PRMT's affiliated partners (i.e., SAI), and potentially provincial and federal funding agencies, where eligible.

5.2 (17) FEDERAL LANDS

There are no federal lands located within the Project footprint.

5.3 (18) JURISDICTIONS HAVING POWERS OR FUNCTIONS IN RESPECT TO THE PROJECT

Multiple federal, provincial and municipal permits, approvals or other authorizations may likely be required following submission and approval of the IPD / Registration Document and prior to start of construction. These permits are listed in the following sections.

5.3.1 FEDERAL APPROVAL

Federal assessments are regulated under the IAA. Submission of an IPD to IAAC is required for projects designated in the *Physical Activities Regulations*. Upon review of the designated activities and through discussions with IAAC, it was determined that the Project is considered a “designated physical activity” under Section 53 of the regulations and will therefore be subject to the IAA process. Through the submission of the IPD, IAAC will determine if the Project necessitates an impact assessment under the IAA.

Additional other federal permits, approvals and authorizations that may be required following the impact assessment are outlined in Table 5.1. Some of these permits may already be in place for the existing port operations or held by relevant third-party contractors. PRMT will engage with the relevant regulatory authorities to determine which permits require updates and which new approvals must be obtained to support the Project.

Table 5.1 Potentially Applicable Federal Permits, Approvals and Authorizations

Agency	Permit, Authorization, Approval	Act/Regulation
Impact Assessment Agency of Canada	Approval for the marine terminal	<i>Impact Assessment Act</i>
Transport Canada	Approval for the marine terminal	<i>Canadian Navigable Waters Act</i>
	Magazine Licence Application	<i>Explosives Act</i>
Natural Resources Canada	Application for Permit to Transport using a Flatbed Trailer	<i>Explosives Act</i>
	Application for Authorization of Explosives	<i>Explosives Act</i>
Fisheries and Oceans Canada	Request for Project Review	<i>Fisheries Act</i>
	Application for Authorization	<i>Fisheries Act</i>
	Compliance with <i>Species at Risk Act</i>	<i>Species at Risk Act</i>
Environment and Climate Change Canada	Compliance with <i>Canadian Environmental Protection Act</i>	<i>Canadian Environmental Protection Act</i>
	Scientific Capture/Handling, Damage or Danger Permits	<i>Migratory Birds Convention Act, 1994</i>
	Compliance with <i>Species at Risk Act</i>	<i>Species at Risk Act</i>

The Project will require approval under the *Canadian Navigable Waters Act* (CNWA). This new approval will replace the existing *Navigation Protection Act* approval (2016-200031). PRMT will engage with Transport Canada on the process for applying for CNWA approval prior to commencing construction activities.

As per DFO’s recommendation, PRMT will submit a Request for Project Review and begin early consultation regarding the Project. DFO further noted that a *Fisheries Act* Authorization, along with additional permitting, may be required depending on the final Project design and the nature and scope of the proposed activities.

It is understood that a SARA permit would be required if the Project will result in harm to aquatic SAR. Based on the information available to date to PRMT, this is not anticipated, but it is understood that this would need to be confirmed with ECCC.

Dredging activities are not anticipated as part of the Project. Therefore, based on the current Project design, a Disposal at Sea Permit under Part 7, Division 3 of the *Canadian Environmental Protection Act*, will not be required.

5.3.2 PROVINCIAL APPROVAL

In accordance with Section 26 of the NL *Environmental Assessment Regulations*, the EA Division has advised PRMT that the Project is required to be registered as a designated undertaking.

Other provincial permits and approvals that may be required prior to start of construction are listed in Table 5.2. Some of these permits may already be in place for the existing port operations or held by relevant third-party contractors. PRMT will engage with the relevant regulatory authorities to determine which permits require updates and which new approvals must be obtained to support the proposed Project.

Table 5.2 Potentially Applicable Provincial Permits and Approvals

Agency	Permit, Authorization, Approval	Applicable Act/Regulations
EA Division	Release from Environmental Assessment	NL EPA / <i>Environmental Assessment Regulations</i>
NLDECCC – Water Resources Division	Alteration to a Body of Water	<i>Water Resources Act</i>
NLDECCC – Pollution Prevention Division	Certificates of Approval for Construction and Operation	<i>Environmental Protection Act</i>
NLDFA – Wildlife Division	Compliance Standard	<i>Endangered Species Act</i>
NLDFA – Forestry Division	Commercial Cutting/Operating Permit	<i>Forestry Act</i>
NLDFA – Crown Lands Division	License to Occupy Crown Lands	<i>Lands Act</i>
Department of Government Services	Certificate of Approval- Storage and Handling of Gasoline and Associated Products	<i>Environmental Protection Act</i>
	Compliance Standard- Occupational Health and Safety	<i>Occupational Health and Safety Regulations</i>
Department of Tourism, Culture, Arts and Recreation	Compliance Standard- <i>Historic Resources Act</i>	<i>Historic Resources Act</i>

5.3.3 MUNICIPAL

The proposed Project is located outside the Town of Baie Verte's official municipal planning boundary. As such, no municipal development or land use permits are currently required for construction or operation.

Nonetheless, PRMT has maintained an open and collaborative relationship with the Town of Baie Verte throughout the planning process. The Town has expressed strong support for the Project and has provided a formal letter of support recognizing the economic and strategic benefits the port expansion will bring to the region. This letter is provided in Appendix A.

Should municipal approvals, consultations, or oversight be required during the course of development, PRMT will adhere to the Town's municipal regulations, bylaws, and other local or provincial requirements, as applicable.

6 PART E: POTENTIAL EFFECTS OF THE PROJECT

As this Project constitutes a federal undertaking—as defined in subsection 3(1) of the *Canadian Environmental Protection Act* it is required to identify non-negligible adverse changes that may result from its execution. In accordance with Schedule 1 (Section 3) of the *Information and Management of Time Limits Regulations* under the IAA, Part E describes potential effects of the Project on the following components:

- (19) A list of any non-negligible adverse changes — to the following components of the environment that are within the legislative authority of Parliament — that may be caused by the carrying out of the project:
 - Fish and fish habitat as define in subsection 2(1) of the *Fisheries Act*;
 - Aquatic species, as defined in subsection 2(1) of the *Species at Risk Act* (marine plants); and
 - Migratory birds, as defined in subsection 2(1) of the *Migratory Birds Convention Act, 1994*.
- (20) A list of any non-negligible adverse changes to the environment — that would occur on federal lands — that may be caused by the carrying out of the project:
 - (20.1) A list of any non-negligible adverse changes to the marine environment — that are caused by pollution and that would occur outside Canada — that may be caused by the carrying out of the project.
 - (20.2) A list of any non-negligible adverse changes to interprovincial waters or to boundary waters or international waters, as those terms are defined in subsection 2(1) of the *Canada Water Act*, — that are caused by pollution — that may be caused by the carrying out of the project.
- (21) With respect to the Indigenous peoples of Canada, a brief description of any non-negligible adverse impacts on physical and cultural heritage, the current use of lands and resources for traditional purposes or any structure, site or thing that is of historical, archaeological, paleontological or architectural significance — occurring in Canada and resulting from any change to the environment — that may be caused by the carrying out of the project, based on information that is available to the public or derived from any engagement undertaken with the Indigenous peoples of Canada.
- (22) A brief description of any non-negligible adverse changes occurring in Canada to the health, social or economic conditions of the Indigenous peoples of Canada, that may be caused by the carrying out of the project, based on information that is available to the public or derived from any engagement undertaken with the Indigenous peoples of Canada.

(22.1) If the Project is to be carried out on federal lands or is a *federal work or undertaking*, as defined in subsection 3(1) of the Canadian Environmental Protection Act, 1999, a list of any non-negligible adverse effects that may be caused by the carrying out of the project.

(23) An estimate of any greenhouse gas (GHG) emissions associated with the Project.

(24) A list of the types of waste and emissions that are likely to be generated — in the air, in or on water and in or on land — during any phase of the project.

6.1 (19) POTENTIAL CHANGES TO THE ENVIRONMENT

IAAC (2024) guidelines for preparing an IPD require a list of non-negligible adverse changes that, as a result of the carrying out of the project, may be caused to the following components of the environment that are within the legislative authority of Parliament:

- Fish and fish habitat as defined in subsection 2(1) of the *Fisheries Act*
- Aquatic species, as defined in subsection 2(1) of the *Species at Risk Act*
- Migratory birds, as defined in subsection 2(1) of the *Migratory Birds Convention Act, 1994*

Subsection 2(1) of the *Fisheries Act* defines 'fish' as: "(a) parts of fish, (b) shellfish, crustaceans, marine animals and any parts of shellfish, crustaceans or marine animals, and (c) the eggs, sperm, spawn, larvae, spat and juvenile stages of fish, shellfish, crustaceans and marine animals". Subsection 2(1) of the *Fisheries Act* defines 'fish habitat' as: "water frequented by fish and any other areas on which fish depend directly or indirectly to carry out their life processes, including spawning grounds and nursery, rearing, food supply and migration areas".

Subsection 2(1) of SARA defines 'aquatic species' as: "a wildlife species that is a fish, as defined in section 2 of the *Fisheries Act*, or a marine plant, as defined in section 47 of that Act". 'Marine plants', as defined in section 47 of the *Fisheries Act*, includes "all benthic and detached algae, marine flowering plants, brown algae, red algae, green algae and phytoplankton".

Potential effects on fish and fish habitat and additional aquatic species are described in Section 6.1.1.

Subsection 2(1) of the *Migratory Birds Convention Act, 1994* defines 'migratory bird' as: "a migratory bird referred to in the Convention, and includes the sperm, eggs, embryos, tissue cultures and parts of the bird". Potential changes to migratory birds as a result of the Project are described in Section 6.1.2.

Potential non-negligible adverse changes to other environmental components which are not explicitly within the legislative authority of Parliament are also summarized below, including marine users (Section 6.1.1) and other wildlife (Section 6.1.2). This additional discussion also provides a more fulsome understanding of effects to be assessed under the NL EPA. Preliminary mitigation to reduce potential Project-related effects is identified, although it is recognized that additional mitigation may be developed as part of the EA process.

6.1.1 MARINE ENVIRONMENT

This section encompasses both ecological components (fish and fish habitat and additional aquatic species, including SAR) and socio-economic components (marine users) that may be affected by the Project. Fish and fish habitat and additional aquatic species are grouped with marine users in the effects assessment because both are key components of the coastal marine environment that may be directly or indirectly affected by Project activities. This grouping allows for a more integrated evaluation of potential effects on ecological functions and resource use.

Marine species that are present in Baie Verte Harbour and have the potential to be affected by the Project are groundfish species, pelagic fish species, marine mammals, benthic invertebrate species (e.g., shellfish such as blue mussels, clams and scallops, as well as crustaceans such as lobster and crab species), and marine flora such as seaweed and kelp species. Eelgrass beds were not identified in the Project area during the drop camera surveys in May 2016, but earlier reports indicate eelgrass may be found in Baie Verte (DFO 2014). Additional information on fish and fish habitat is provided in Section 4.7.2.2 and Section 4.7.4.

Construction of a marine terminal can also disrupt local marine users, particularly Indigenous, recreational, and commercial fishers. Recreational fishing in this area includes cod, capelin, mackerel, and squid. Cod, mackerel, and capelin fisheries are seasonal; squid is fished year-round. The fishery is open to residents, non-residents, and tour operators. Commercial fishing in NAFO division 3K targets Atlantic halibut and Atlantic herring, with limited activity directly in Baie Verte / Pine Cove (fewer than five vessels). Communal commercial licences have been issued to Indigenous groups for NAFO Division 3K, but there are no active FSC licences currently in place. Based on currently available public records and regional context, the activity level of non-fisheries marine users near the Project area appears limited, with low to moderate vessel activity in the region. Additional information on marine users is provided in Section 4.7.2.3.

Based on the preliminary identification of likely Project-environment interactions, the Project will interact with both ecological and socio-economic components of the marine environment during all phases (i.e., construction, operation, and rehabilitation and closure). Most of the potential effects are associated with the construction of the second berth. Potential effects during operation are expected to be similar in nature and extent to those resulting from activities at the currently operating marine terminal.

The Project-related interactions and likely effects, along with the proposed mitigation measures to reduce or avoid these effects, are described below.

6.1.1.1 CONSTRUCTION

The following construction activities have potential to affect ecological and/or socioeconomic components of the marine environment:

- Cleaning and grubbing of shoreline areas
- Landside excavation and blasting
- Infilling and placement of core, filter, and armourstone materials
- Installation of berth infrastructure

6.1.1.1.1 POTENTIAL EFFECTS

The primary potential effects on fish and fish habitat and additional aquatic species resulting from construction activities include:

- Loss of fish and fish habitat within the footprint of the infilling and berth infrastructure
- Loss of sensitive or important marine habitats such as eelgrass beds if they occur within the footprint of the port, and avoidance is not feasible
- Alteration to fish and fish habitat due to re-suspended sediment, fuel spills, and/or dust and runoff from land-based activities
- Behavioural effects on invertebrates, fishes, and other marine species due to noise and vibrations associated with construction activities (e.g., on-land blasting, pile driving, and vessel activity)
- Project-related vessel traffic potentially leading to introduction of aquatic invasive species (AIS) and an increase in vessel collisions with marine mammals
- Attraction of fish by subsurface structures (reef effect)

The primary potential effects on fishers and other marine users resulting from construction activities include:

- Loss of access to traditional and current fishing grounds due to active construction areas (within an approximately 300 m safety buffer around construction activities)
- Disruptions to navigation and potential for vessel collisions due to increased vessel traffic
- Lower catch rates resulting from changes in fish availability and behavior
- Gear damage such as nets, traps, or lines being displaced, entangled, or destroyed by construction activities or vessels

6.1.1.2 POTENTIAL MITIGATION

The following preliminary mitigation measures will be implemented as applicable to reduce potential construction-related effects; additional mitigation measures may be identified as Project planning and assessment continues:

- Buffers will be established between natural the marine environment and stockpiles (waste rock, overburden, and topsoil).
- On-land blasting will be set back at a suitable distance from the high-water mark to reduce underwater noise.
- Runoff water will be contained to limit sedimentation and potential contaminants from entering the marine environment.
- Dust suppression techniques will be implemented as needed (e.g., water spraying, covering stockpiles) during construction to reduce airborne particles from entering marine waters.
- Spill kits and containment measures on-site will be maintained to prevent pollution from equipment near water.
- Pre-construction surveys will be conducted in areas where construction will occur to identify sensitive or important marine habitats such as eelgrass beds. Eelgrass will be avoided before construction begins, where possible. Where avoidance is not feasible, standard mitigation measures will be employed in addition to requirements established through applicable federal / provincial regulations.
- Sediment/silt curtains will be used during in-water works to control sedimentation.
- If in-water pile driving is required for the Project, quieting techniques (e.g., bubble curtains) will be implemented to reduce underwater noise levels.
- Vessel speed will be reduced in the approaches to the berth and will follow federal vessel speed guidelines to reduce marine mammal collisions.
- To prevent the introduction or spread of AIS, vessels entering Newfoundland ports will follow biosecurity protocols enforced through Transport Canada. Equipment that has been in the marine environment (i.e., excavators, piping, etc.) will be cleaned to prevent the transfer of invasive species.
- To the extent practical, work will be scheduled to avoid periods when the Project activities are anticipated to affect navigation of other marine users in the area of the terminal.
- Project-related vessels will use a pilotage service to support navigational safety
- Local fishers and other marine users will be notified in advance of construction activities to help reduce disruption and allow for planning around temporary access restrictions.

Construction of the laydown / storage areas will require clearing and land preparation immediately adjacent to the marine environment, as well as infilling in the marine environment. Use of erosion and sediment control measures identified in the mitigation measures listed above will be important to help prevent sediment-laden runoff from entering the marine environment. In addition, a buffer of at least 25 m between natural waterbodies and waste rock, overburden, and topsoil piles will be maintained to reduce the risk of sedimentation. Use of sediment / silt curtains or other similar methods in the marine environment will be used during construction to limit the extent of the effects of suspended sediments.

Given the industrial nature of the existing marine terminal area and based on review of the 2016 drop-camera survey, the marine habitat and seabed do not represent unique or limited habitat within the area. Furthermore, the armourstone and filter stone installed during construction will create complex marine habitat that is suitable for use by a variety of marine invertebrates and fishes. Fixed structures typically become a focus for marine production (e.g., reef effect) by attracting marine life, including invertebrates and fishes. Structures built in the marine system may potentially provide alternate habitat for marine benthos, such as lobster, and prove beneficial in terms of benthic species diversity in the area.

While the placement of armourstone, filterstone, and fixed structures may result in coincidental ecological benefits, such as the potential for habitat establishment over time, these outcomes are not considered formal offsetting measures. PRMT will apply for an Authorization pursuant to the *Fisheries Act* Section 35(2)(b), including the preparation of a Marine Fisheries Offsetting Plan. This Plan will be developed in consultation with DFO, to offset the likely effects of the Project on marine fish and fish habitat.

Underwater noise, particularly when pile driving and blasting, may result in potential physical effects (e.g., injury), habitat avoidance, changes in migration, and/or changes in reproductive or feeding behaviour for marine fish and marine mammals. To avoid potential effects of sound from blasting on land, charge size will be reduced if the location of the blast is near the waters edge. Marine blasting guidelines for the use of explosives in or near Canadian fisheries waters will be reviewed and incorporated into plans to mitigate effects on the marine environment.

While construction-related marine vessel traffic and activity are anticipated to increase during this phase, it is expected to be temporary (approximately six months) and will occur within an area already subject to ongoing marine operations. To further support awareness and coordination, PRMT will proactively engage with marine users prior to the commencement of construction to provide advance notice of planned activities. As such, if disruption to marine users occurs, it would be limited in nature and localized to the vicinity of the marine terminal.

6.1.1.2 OPERATION

The following operation activities have potential to affect ecological and/or socio-economic components of the marine environment:

- Presence of vessels at the berth
- Movement of vessels between the port and pilotage area

6.1.1.2.1 POTENTIAL EFFECTS

The primary potential effects on ecological and/or socio-economic components of the marine environment resulting from operation activities include:

- Behavioural effects on invertebrates, fishes and other marine species due to additional noise and vibrations associated with vessel activity
- Increase in potential collisions between marine mammals and Project vessels along the shipping lane between the port and the pilotage area north of the Project
- Navigation conflicts for marine users due to increased vessel traffic

6.1.1.2.2 POTENTIAL MITIGATION

The following preliminary mitigation measures may be implemented to reduce potential Project operation related effects; additional mitigation may be identified as Project planning and assessment continues:

- Vessel engine noise while at berth will be reduced to the extent practicable
- Vessel speed will be reduced in the approaches to the berth and will follow federal vessel speed guidelines to reduce marine mammal collisions
- Project-related vessels will use a pilotage service to support navigational safety

Project vessels will comply with applicable legislation, codes and standards of practice for shipping, including the *Ballast Water Regulations* under the *Canada Shipping Act* to reduce risk of introduction of AIS

During operation of the Project, the primary activity that will likely affect components of the marine environment is transportation (i.e., vessel presence and movement). The most likely effects of vessel operation on the marine environment are behavioural changes to marine species due to exposure to the additional noise and vibration associated with vessel operation, and the increased potential for collisions between Project vessels and marine mammals.

During operation, noise produced by vessels transporting aggregate and other products may adversely affect the behaviour of marine species near the ship loading area and in the shipping lane between the port and the pilotage area north of the Project. As indicated in Section 3.6.2, PRMT anticipates a modest potential future increase in vessel traffic from the current approved vessel traffic rates for the existing marine terminal. Large shipping vessels (i.e., bulk carriers) will be used to transport aggregate and other products to markets. These large vessels are expected to be greater than 120 m in length and will therefore have limited maneuverability to avoid collisions with marine mammals. Project-related vessels will follow federal vessel speed guidelines and operate at a maximum speed of 8 knots in coastal waters to reduce the risk of collision with marine mammals.

Shoreline features such as infilling areas and causeways can succumb to heavy wave and ice action over the years. It may be possible for causeway and infilling material to shift or be washed out during extreme storm events. This can lead to potential navigational safety hazards or interrupt navigation for other marine users in the area. PRMT will proactively manage marine infrastructure (roads, culverts, bridges, causeway and shoreline infilling area) to mitigate adverse effects.

6.1.1.3 REHABILITATION AND CLOSURE

The Project is anticipated to have a 30-year operational life. The physical activities associated with rehabilitation and closure would include removal of the timber cribs and barge from the berth structure. The causeway and shoreline infilling will remain in place but will be managed long term. Many of the marine activities, potential effects, and mitigation measures already described for the construction phase are also relevant to rehabilitation and closure. The generation of underwater sound and the potential of re-suspension of sediment will likely be the two activity-associated consequences that could potentially have the most effect on the marine environment. Rehabilitation and closure methods and activities will comply with applicable federal and provincial regulatory requirements in force at the time.

6.1.1.4 SUMMARY

While potential non-negligible adverse effects on the marine environment as a result of Project activities are anticipated, with the implementation of mitigation measures, changes to the marine environment are not expected to threaten the long-term persistence of fish, or marine mammal species or populations, in the vicinity of the Project, or cause effects that are contrary to or inconsistent with the goals, objectives or activities of recovery strategies, action plans and management plans.

6.1.2 WILDLIFE (INCLUDING MIGRATORY BIRDS)

This section encompasses migratory birds and other wildlife, including SAR, that may be affected by the Project. These ecological components are assessed together because they share similar habitat requirements and are influenced by many of the same environmental stressors, such as habitat alteration, noise, and human activity. Grouping them allows for a more holistic evaluation of potential effects on biodiversity and ecosystem function.

It is noted that general bird and wildlife interactions with the Project are expected to be similar to those observed in SAR or SOCC. As such, potential effects on common species may also be indicative of effects on more sensitive populations.

The federal *Migratory Birds Convention Act, 1994* was designed to protect and conserve migratory birds, both at the levels of species, populations and individuals, and their nests. The Act and its associated Regulations are administered through ECCC by the Canadian Wildlife Service (ECCC-CWS). Coverage of the *Migratory Birds Convention Act, 1994* includes land birds (e.g., warblers, thrushes, sparrows, and waterfowl [e.g., loons, ducks and geese]), and water birds (e.g., gulls and terns) but does not include grouse, ptarmigan, hawks, owls, eagles, falcons,

cormorants, kingfishers, blackbirds, crows, or jays. However, these species receive the same form of protection under the provincial *Wild Life Act*.

A wide range of land, shore, and marine birds have the potential to occur near the Project, including migratory bird species as defined in the *Migratory Birds Convention Act, 1994*. Several bird SAR, such as the ivory gull, red crossbill, and rusty blackbird, may also be present in the vicinity. In addition, other wildlife species, including terrestrial SAR, may occur near the Project site. Additional information on migratory birds and other wildlife is provided in Section 4.7.2.3 and Section 4.7.4.

Based on the preliminary identification of likely Project-environment interactions, the Project will interact with migratory birds and other wildlife species during all phases (i.e., construction, operation, and rehabilitation and closure). Most of the potential effects are associated with the construction of the second berth. Efforts will be made to mitigate risks of potential harm to wildlife imposed by Project activities, including disturbance of breeding birds and/or their nests, and to align with federal and provincial wildlife and SAR legislation. Effects during operation would be similar in nature and extent as effects resulting from on-going activities at the existing marine terminal.

The Project-related interactions and likely effects, along with the proposed mitigation measures to reduce or avoid these effects, are described below.

6.1.2.1 CONSTRUCTION

The following construction activities have the potential to affect migratory birds and other wildlife:

- Cleaning and grubbing of shoreline areas
- Excavation and blasting
- Infilling and placement of core, filter, and armourstone materials
- Construction of marine and on land infrastructure

6.1.2.1.1 POTENTIAL EFFECTS

The primary potential effects on the migratory birds and other wildlife resulting from construction activities include:

- Mortality and/or destruction of nests and/or eggs or other habitat or structure necessary for the reproduction and survival of SAR that may be within the footprint of the Project
- Project-related noise, vibrations, artificial lighting, and human presence resulting in behavioral changes, injury, mortality, sensory disturbance or change in habitat use by wildlife
- Collisions with vehicles, vessels and/or associated infrastructure resulting in direct mortality

6.1.2.1.2 POTENTIAL MITIGATION

The following preliminary mitigation measures will be implemented to reduce potential construction related effects; additional mitigation measures may be identified as Project planning and assessment continues:

- Construction-related noise will be reduced by reducing equipment and vehicle idling, using appropriately sized equipment for the task, employing mufflers/silencers/enclosures as applicable, and conducting preventative maintenance on equipment and vehicles.
- Collision risk reduction measures will be implemented, and incidental encounters will be reported to the Operational Health and Safety Advisor.
- Where feasible, vegetation clearing will occur outside of the active bat season (approximately May –October 2025) and regional bird breeding season (May 1-August 15).
- Should key habitat features (e.g., hibernacula, maternity roosts, raptor nests) be encountered during construction (or other phase of the Project), work will immediately cease, and the Health, Safety and Environmental Superintendent or designate and Wildlife Division will be contacted.
- Buffers will be established around known nests, roosts, and hibernacula and staff and crew will be made aware of the possibility of undiscovered nests, roosts, and hibernacula and the steps to take should one be identified.
- Food scraps and other garbage will be properly disposed of to avoid potential attraction of birds and wildlife.
- Deterrents will be applied, if needed, to discourage the nesting of migratory birds in stockpiles left unattended.
- To reduce the disorientation and attraction of nocturnal species, due to human-induced light, the number of lights possible will be limited, while maintaining the safety of crews working at night.
- Timing windows and permitting recommended by ECCC and federal/provincial guidelines for SAR will be followed.
- While construction activities will occur continuously throughout the construction timeline, interactions between birds and other wildlife could happen at any time.

The Project area must, for worker safety, be well lit with high intensity lighting at night, and although the lighting will be directed as narrowly as possible by shielding, these lights may have disorienting effects on migrating birds particularly on foggy and overcast nights. To reduce the risk to migrant birds, the minimum amount of lighting will be used on tall structures. High intensity lights, including shielded downward-directed floodlights, will be turned off at night outside of working hours, if possible, especially during the spring and fall migration period.

Should seabirds or other species become stranded on vessels, PRMT would expect vessel operators to adhere to appropriate handling protocols, such as best practices for stranded birds encountered offshore Atlantic Canada (Environment Canada 2015). It is recognized that a valid bird handling permit from ECCC-CWS will be required to perform and document the release of stranded seabirds.

The likely effects on terrestrial mammals during construction of the Project are anticipated from clearing of vegetation for laydown areas and the port access roads and subsequent loss of habitat, and increased noise (including truck transport and aggregate transfer to vessels) and disturbance from traffic and other human activities in the Project area. Local nocturnal species may be attracted to and/or disoriented by changes in ambient lighting. The Project footprint represents a small portion of the available habitat in the broader area, and existing operations have been active since 2016, with adjacent mining activities predating that. This long-standing industrial presence has likely allowed local wildlife to adapt to ongoing activities at the existing marine terminal.

Project activities may also cause changes in the diversity and relative abundance of local mammal populations, such as potential increase in fox and/or coyotes, that are well adapted to human presence. Therefore, good housekeeping practices will be enforced during Project activities to reduce potential effects.

1.2.1.1 OPERATION

The following operation activities have potential to affect migratory birds and other wildlife:

- Marine vessel traffic associated with shipping operations
- Presence and activity of personnel
- On-site vehicle movement and equipment operation

6.1.2.1.3 POTENTIAL EFFECTS

The primary potential effects on migratory birds and other wildlife resulting from operation activities include:

- Mortality and/or destruction of nests and/or eggs or other structure necessary for the reproduction and survival of SAR within the footprint of the Project
- Project-related noise, vibrations, artificial lighting, and human presence resulting in behavioral changes, injury, mortality, sensory disturbance or change in habitat use
- Collisions with vehicles, vessels and/or associated infrastructure resulting in direct mortality

6.1.2.1.4 POTENTIAL MITIGATION

The following preliminary mitigation measures may be implemented to reduce potential operation-related effects; additional mitigation may be identified as Project planning and assessment continues:

- Operation-related noise will be reduced by reducing equipment and vehicle idling, using appropriately sized equipment for the task, employing mufflers/silencers/enclosures as applicable, and conducting preventative maintenance on equipment and vehicles.
- Collision risk reduction measures will be implemented, and incidental encounters will be reported to the Operational Health and Safety Advisor.
- If the nest of a bird is encountered during operation activities, work around the nest will be immediately stopped and the Operational Health and Safety Advisor notified.
- Work will not continue in the area until the nest is no longer occupied, otherwise the work plan will be modified to avoid nest sites.
- Buffers will be established around known nests, staff and crew will be made aware of the possibility of undiscovered nests.
- Food scraps and other garbage will be properly disposed of to avoid attraction of potential predators.
- Deterrents will be applied, if needed, to discourage the nesting of migratory birds in stockpiles left unattended.
- To reduce the disorientation and attraction of nocturnal species, due to human-induced light, the number of lights possible will be limited, while still maintaining the safety of crews working at night.
- Timing windows and permitting recommended by ECCC and federal/provincial guidelines for SAR will be followed.

During operation, no further loss of habitat is anticipated, but effects related to sensory disturbance from noise, lights and human presence and mortality risk due to collisions will continue and be similar to those described for construction. Human activity associated with Project operation may result in wildlife interactions; however, these interactions are anticipated to be similar in nature to those occurring with the existing operation of the port. While an additional berth is being added, main activities at the marine terminal during operation (i.e., vessel loading and vessel movements) are anticipated to have a modest increase only. The regional wildlife has likely adapted to these human activities.

As described for construction, lights may have disorienting effects on migrating birds particularly on foggy and overcast nights. To reduce the risk to migrant birds, the minimum amount of lighting will be used on tall structures. High intensity lights, including shielded downward-directed floodlights, will be turned off at night outside of working hours, if possible, especially during the spring and fall migration period.

As for construction, should seabirds or other species become stranded on vessels, PRMT would expect vessel operators to adhere to appropriate handling protocols, such as best practices for stranded birds encountered offshore Atlantic Canada (Environment Canada 2015). It is recognized that a valid bird handling permit from ECCC-CWS will be required to perform and document the release of stranded seabirds.

The likely effects on terrestrial mammals during operation are anticipated from noise (including truck transport and aggregate transfer to vessels) and disturbance from traffic and other human activities in the Project area. Local nocturnal species may be attracted to and/or disoriented by changes in ambient lighting.

Project operation may cause changes in the diversity and relative abundance of local mammal populations, such as potential increase in fox and/or coyotes, that are well adapted to human presence. Therefore, good housekeeping practices will be enforced during Project operation activities to reduce the potential effects.

6.1.2.2 REHABILITATION AND CLOSURE

The physical activities associated with rehabilitation and closure would include removal of the timber cribs from the berth structure. The causeway and shoreline infilling will remain in place but will be managed long term. Many of the activities, potential effects, and mitigation measures already described for the construction and operation phase are also relevant to rehabilitation and closure as it applies to migratory birds and other wildlife. Rehabilitation and closure methods and activities will comply with applicable federal and provincial regulatory requirements in force at the time.

6.1.2.3 SUMMARY

While potential non-negligible adverse effects on migratory birds and wildlife as a result of Project activities are anticipated, with the implementation of mitigation measures, changes to the wildlife environment are not expected to threaten the long-term persistence of wildlife species or populations, in the vicinity of the Project, or cause effects that are contrary to or inconsistent with the goals, objectives or activities of recovery strategies, action plans and management plans.

6.2 (20) CHANGES TO THE ENVIRONMENT ON FEDERAL AND TRANSBOUNDARY LANDS

The Project is situated within PRMT-tenured lands and is not located on federal lands, as outlined in Section 4.6. As a result, non-negligible adverse changes are not anticipated on federal lands as a direct or indirect consequence of the proposed Project.

Furthermore, potential environmental effects are limited to the Project area as defined in this document. As such, the Project is not expected to cause non-negligible adverse changes to the marine environment outside Canada due to pollution. Similarly, there are no anticipated non-negligible adverse changes to interprovincial waters, boundary waters, or international waters, as defined in subsection 2(1) of the *Canada Water Act*, that would result from pollution caused by the Project.

6.3 (21) IMPACT ON THE ENVIRONMENT ON INDIGENOUS PEOPLES

The Project may result in potential non-negligible adverse effects on access or loss of traditional lands and the ability to hunt, fish, gather and harvest as well as the ability to practice cultural activities. Potential non-negligible adverse effects on the marine environment (Section 6.1.1) and wildlife (Section 6.1.2) could potentially affect traditional land and resource use by Indigenous peoples. As discussed in Section 4.5, individual Qalipu or Miawpukek First Nation members may reside in nearby communities; however, there is no record of current or historical use of the Project lands for traditional purposes, nor known sites of cultural or historical importance. Mitigation measures detailed in Sections 6.1.1 and 6.1.2 will be implemented to reduce adverse effects to the environment which will also reduce non-negligible effects to Indigenous peoples.

Previous research and agency responses related to adjacent quarry permits have confirmed that there are no designated Indigenous lands within the Project area, and PRMT is not aware of FSC fishing activities in Pine Cove or the surrounding approaches. However, if such activities do exist, the mitigation measures outlined in Section 6.1.1 will help reduce potential effects on Indigenous fishers. With mitigation, no non-negligible residual adverse effects on Indigenous physical and cultural heritage; the current use of lands and resources for traditional purposes; and any structure or thing of historical, archaeological, paleontological or architectural significance are anticipated based on information that is available to the public or derived from engagement undertaken with the Indigenous peoples of Canada.

PRMT remains committed to ongoing engagement and will notify Indigenous groups upon submission of the IPD / Registration Document, allowing transparency and continued dialogue throughout the Project's development. PRMT is a highly respected company that has long operated in the Baie Verte region. As a local company they recognize the importance of Indigenous people in Canada and respect the value they bring to the local community.

6.4 (22) IMPACT ON THE HEALTH, SOCIAL OR ECONOMIC WELLBEING OF INDIGENOUS PEOPLES

Potential non-negligible adverse effects to the environment where traditional use and/or commercial purposes by Indigenous peoples occurs could affect Indigenous health, social, and economic wellbeing of Indigenous peoples. This could occur where the quality of natural resources on which Indigenous communities rely on for traditional or commercial purposes are affected by the Project. As noted above, the Project will interact with both ecological and socioeconomic components of the marine environment during all phases (i.e., construction, operation, and rehabilitation and closure). Communal commercial fishing conducted by Indigenous peoples is culturally important and also represents an important source of income to Indigenous communities.

Communal commercial fishing is culturally and economically important to Indigenous communities and licences have been issued for NAFO Division 3K. However, PRMT is not aware of Indigenous fishing activity in Pine Cove or the surrounding approaches, and Indigenous presence near the site is considered low as discussed in Section 4.5. If such activities do exist, the mitigation measures outlined in Section 6.1.1 will help reduce potential effects on Indigenous fishers.

The Project is an expansion of an existing marine terminal that has been in operation for several years without reported impacts on Indigenous communities. Based on engagement to date, no health, social, or economic effects have been identified regarding the expansion, as discussed in Section 2.4. On the contrary, the expansion is expected to bring positive benefits to both Indigenous and non-Indigenous residents through increased employment opportunities and improved infrastructure.

As noted in Section 4.6, the Project will not be carried out on federal lands; however, it is considered a federal work or undertaking as defined under subsection 3(1) of the *Canadian Environmental Protection Act, 1999*. This definition includes:

(a) a work or undertaking operated for or in connection with navigation and shipping, whether inland or maritime, including the operation of ships and transportation by ship

Because the Project involves marine terminal infrastructure and shipping activities, it falls within this definition.

With mitigation, no non-negligible residual adverse effects on Indigenous health, social or economic conditions are anticipated as a result of carrying out of the Project. This prediction is based on information that is available to the public or derived from engagement undertaken with the Indigenous peoples of Canada.

6.5 (23) GREENHOUSE GAS EMISSIONS ASSOCIATED WITH THE PROJECT

PRMT is committed to the environment and will incorporate practical and feasible mitigation measures to reduce GHG emissions resulting from the Project.

The main GHGs, carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O), can be emitted from a number of natural and anthropogenic sources. Total GHG emissions are reported on the basis of CO₂ equivalent (CO₂e). This is accomplished by multiplying the emission rate of each compound by its global warming potential relative to CO₂. The global warming potentials used by ECCC were used for this assessment (CO₂ = 1, CH₄ = 28, N₂O = 265) (ECCC 2025b). For example, 1 tonne of CH₄ equals 28 tonnes of CO₂e.

GHG emissions vary substantively by province. The level of emissions depends on factors such as population, energy sources, and economic base. Provinces and territories that are the most populated have economies based on resource extraction or are relying on fossil fuels to generate electricity will tend to have higher emission levels. In 2023, the top five emitters (Alberta, Ontario, Quebec, Saskatchewan, and British Columbia) together released 91% of Canada's national total GHG emissions. Of the top five emitters, GHG emissions were lower in 2023 than in 2005 for Ontario, Quebec, Saskatchewan, and British Columbia.

In comparison, NL's emissions have decreased by 21% over this period. The province still remains a relatively small contributor to Canada's total GHG emissions, with emissions that represent 1.1% of the Canadian total in 2023 (ECCC 2025b).

The Project will produce GHG emissions during construction and operation. The main emission sources during construction are heavy construction equipment, such as loaders, that combust diesel. The construction equipment, both on-land and in water, will be used to conduct site preparation activities, including removing vegetation, earthworks, construction of infrastructure, and construction of the port access road. Approximately 411,520 litres of diesel are anticipated to be used during construction. A small amount of emissions will be produced as a result of blasting for construction.

The existing terminal uses diesel to operate mobile equipment for loading and transporting rock to the vessels. Similar operations are expected during operation of the second berth. Because the Project involves an increase in aggregate / armourstone / mineral products throughput, it is anticipated that additional diesel use by marine terminal equipment will occur. Estimates of diesel use per tonne of material moved through the existing port that were developed by PRMT were used to estimate the amount of diesel use associated with the anticipated increase in throughput at the port as a result of the Project. While at the Project, ships will use onboard cranes to hoist and store material onboard. A conservative estimate of ship fuel use while at berth was also provided by PRMT as 5.2 tonnes of marine gas oil per visit for a total of 91,873 litres per year of diesel.

The existing marine terminal uses electricity from the NL electrical grid. An estimate of electricity consumption per tonne of material moved was used with the anticipated Project throughput to estimate the additional electricity consumption because of the Project.

The GHG emissions released because of the Project were estimated using emission factors in line with NL's GHG emission reporting program (under the *NL Management of Greenhouse Gas Reporting Regulations*) for direct emissions. For GHG emissions from grid electricity use, ECCC's projected electricity intensity factors for the NL grid were used (ECCC 2025c). In addition to on-land diesel, marine diesel will be combusted by marine vessels while loading at the wharf.

The estimated GHG emission totals during the Project's construction phase and the operation phase are presented in Table 6.1.

Table 6.1 Estimated Greenhouse Gas Emissions for the Project

Direct and Indirect Project Sources	Total CO ₂ e (tonne per year)
Construction	
On-land Diesel	1,141
Operations	
On-land Diesel	1,130
Marine Diesel	255
Electricity Consumption	16.5
Subtotal Operation (Direct and Indirect)	1,402

Fuel use monitoring will continue to be performed as part of PRMT's operations. PRMT will also continue to explore opportunities to reduce GHG emissions over the course of its operations, starting with preliminary engineering design currently underway. Potential methods to reduce GHG emissions include design and construction of a marine terminal to handle ships of up to 65,000 DWT. The proposed marine terminal would allow larger ships thus taking advantage of the economy of scale and reducing the number of ship visits. This would likely reduce fuel consumption and GHG emissions associated with transporting the product to buyers.

PRMT and SAI have already implemented a number of operational upgrades and energy transition measures that have reduced its GHG emissions intensity:

- Since inception, PRMT and SAI have transitioned from on-site diesel-based power generation to 100% hydroelectric grid power, eliminating emissions associated with fossil fuel-based electricity production.
- Through the upscaling and modernization of aggregate processing equipment, SAI has achieved a 32% decrease in operational GHG emissions, primarily by reducing fuel consumption and improving equipment throughput efficiency.
- Conveyor optimization and the adoption of automated stacking and reclaim systems have further reduced energy demand and idle time for heavy equipment, contributing to cumulative environmental benefits.

These initiatives demonstrate PRMT and SAI's commitment to continual improvement and the integration of Environmental Social Governance principles into its operational strategy. Emissions performance will continue to be tracked and reported as part of the company's environmental management system, with further reductions targeted as new technologies and efficiencies are implemented.

6.6 (24) PROJECT RELATED EMISSIONS AND WASTE

The Project will generate emissions and waste typical of export operations for aggregate and other materials. PRMT is committed to reducing these outputs through a combination of best management practices, operational efficiencies, and the implementation of clean technologies where feasible. Information on the main mitigation measures to be implemented to reduce discharges and emissions in the environment is provided in the following sections.

6.6.1 ATMOSPHERIC EMISSIONS

Atmospheric emissions associated with the Project will include:

- GHGs from combustion engines during site preparation, material handling, and vessel loading
- Particulate matter (PM) generated from material handling and surface activity (e.g., haul roads, laydown areas)
- Criteria air contaminants (CACs) such as nitrogen oxides (NO_x), sulfur oxides (SO_x), and volatile organic compounds (VOCs), primarily from diesel-powered equipment

The following preliminary mitigation measures may be implemented to reduce atmospheric emissions; additional mitigation measures may be identified as Project planning and assessment continues:

- Use of Tier 4 or equivalent low-emission equipment
- Dust suppression protocols, including water trucks, stockpile wetting, and use of covered conveyors for loading of mineral products on vessels
- Reduction of idling and optimization of haul routes to reduce fuel use
- PRMT's transition from diesel-generated power to 100% hydroelectricity, eliminating on-site combustion-based electricity generation

6.6.2 SOLID WASTE

The Project will generate minor quantities of solid waste during construction and operation, including:

- Non-hazardous waste (e.g., wood, metal, packaging)
- Waste rock and fines from blasting for site preparation
- General refuse from site personnel

Waste will be managed in accordance with provincial regulations. Non-hazardous solid waste will be sorted, recycled where possible, and disposed of at an approved facility. Minimal hazardous waste is anticipated, primarily lubricants and filters, which will be stored, handled, and disposed of by licensed contractors.

6.6.3 WASTEWATER AND EFFLUENTS

Operational wastewater will consist primarily of:

- Runoff and stormwater from aggregate stockpiles and laydown areas
- Process water from dust suppression or cleaning activities

Water discharges at the marine facility are currently managed through appropriate drainage and sediment control systems to prevent impacts to nearby waterbodies. PRMT will implement erosion and sediment control measures, in compliance with the provincial *Environmental Protection Act* and the *Water Resources Act*.

As stated in Section 3.4.2, the mineral product storage building will be equipped to allow for washdown of equipment prior to exiting the building. This washdown water will be captured and water will be stored in a holding tank for eventual transport via pumper/tank truck for disposal at a licensed facility.

6.6.4 MARINE EMISSIONS

During operation, vessels berthed at the marine terminal may emit GHGs and CACs from auxiliary engines. These emissions will be reduced by efficient scheduling, reducing berth times, and exploring the feasibility of shore power options in future development phases.

7 PROJECT RELATED DOCUMENTS

There are no additional project related documents accompanying this submission.

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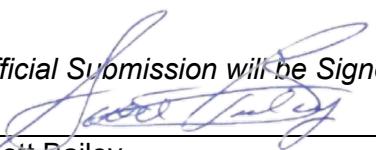
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9 LIMITATIONS

This IPD / environmental registration document was prepared by Jewer Bailey Consultants ULC (JBC) in consultation with PRMT / Shoreline Aggregates Inc. for their use under the terms defined the contract between the two parties. The information included in this document was provided in part by the client and relates to the scope of this project exclusively. JBC have worked with the client and utilized JBC's extensive knowledge with respect to the existing port facilities and potential environmental related concerns, as accurately as possible and with the information available, to the development of the site in a safe and environmentally sustainable manner.

10 SIGNATURE

Official Submission will be Signed



Scott Bailey
CEO/President
Pointe Rousse Marine Terminal Ltd.

December 5th, 2025

Date

APPENDIX A LETTERS OF INTENT AND SUPPORT



Shoreline Aggregates Inc.
PO Box 184, 325 Highway 410
Baie Verte, NL, Canada, A0K 1B0

October 1st, 2025

Dwan Street
President – FFAW
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Reference: Proposed Port Expansion at Point Rousse, Baie Verte Peninsula

Dear Ms. Street,

We are reaching out to inform and engage with the FFAW regarding a proposed infrastructure expansion project by **Point Rousse Marine Terminal Ltd.** The existing marine terminal located at Point Rousse, on the Baie Verte Peninsula, Newfoundland and Labrador, within the NAFO division 3K area.

SAI is proposing to expand and upgrade the existing port infrastructure at Point Rousse to support regional economic development and diversification. The proposed expansion includes:

- Upgrades to quayside infrastructure to improve loading and unloading capabilities
- Additional laydown and staging areas to support operational efficiency
- Shoreline infilling to increase usable space and accommodate future growth

This development is intended to enhance the terminal's capacity for aggregate exports and enable future multi-user operations, including bulk mineral shipments. Current vessel traffic at the existing marine terminal site is primarily associated with ship loading and exporting of bulk materials. The proposed expansion will involve the same types of activities, with a modest increase in vessel traffic. The primary function of this expansion is to increase storage and berthing availability; with increases to ocean going vessel traffic expected to be within 50% (10-20 vessels per year), and well within historical peaks at the facility.

Figure 1 illustrates the Project location for the proposed port expansion:

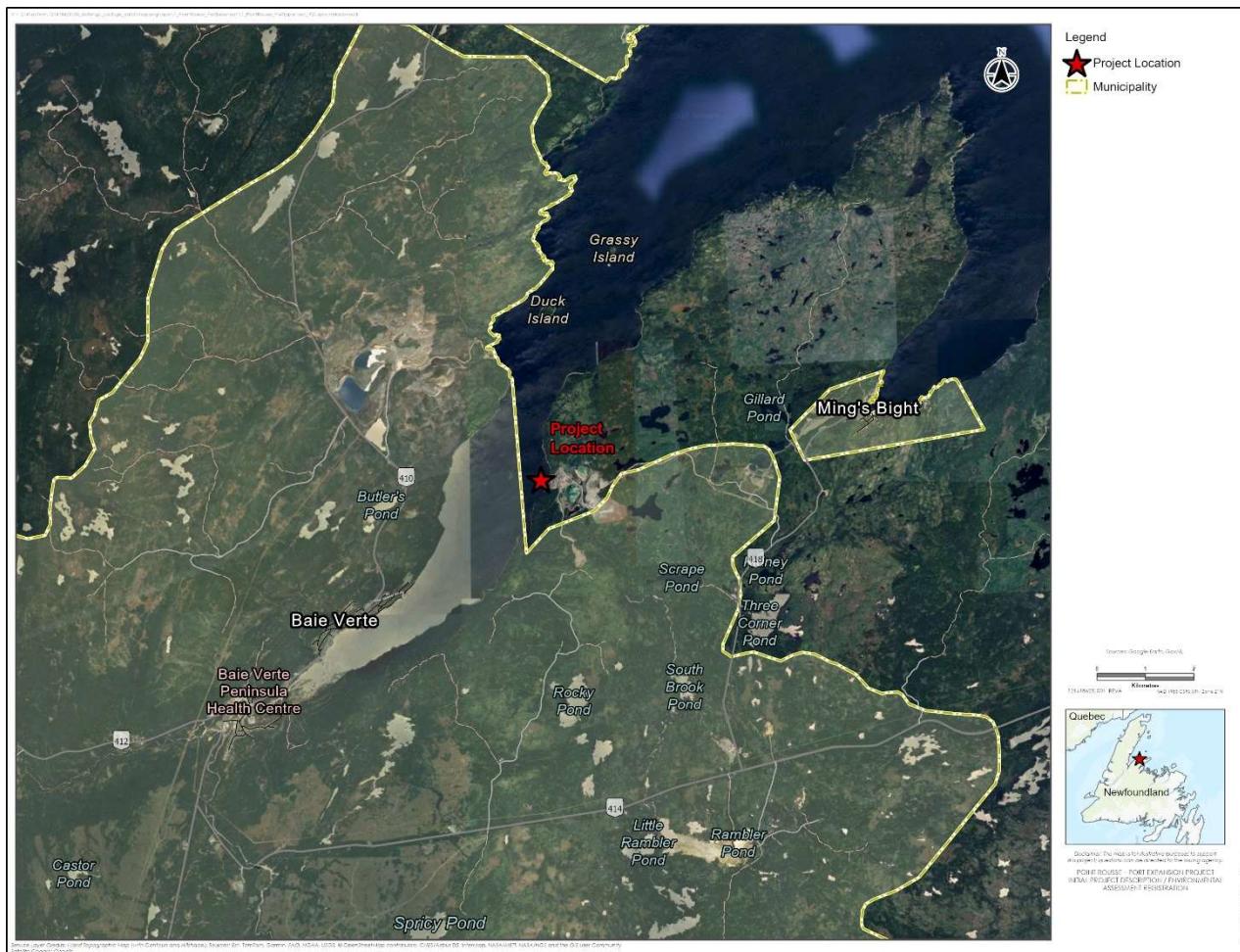


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We recognize and respect the importance of communal commercial fishing licenses and your stewardship of the lands and waters in this region. SAI welcomes your input and invites you to identify questions and concerns regarding this initiative. Your insights are important so that the Project reflects shared values and priorities. We would ask that you please provide any feedback by Oct 10th, 2025. We would also be pleased to arrange a meeting or provide further information at your convenience.

Please feel free to contact us at slewis@shorelineaggregates.net or 709 532 7925 to discuss next steps or to schedule a time to connect.

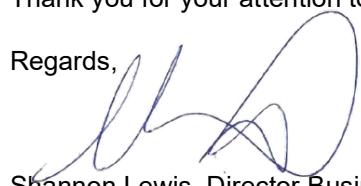
October 1st, 2025

Page 3 of 3

Reference: **Proposed Port Expansion at Point Rousse, Baie Verte Peninsula**

Thank you for your attention to this matter. We look forward to hearing from you.

Regards,



Shannon Lewis, Director Business Development

SHORELINE AGGREGATES INC.

CC.

Katie Power, Industry Relations Representative
kpower@ffaw.ca

Julian Ryan, Member Representative Area 3K
jryan@ffaw.ca



Shoreline Aggregates Inc.
PO Box 184, 325 Highway 410
Baie Verte, NL, Canada, A0K 1B0

October 1st, 2025

Chief Eugene Hart
Sheshatshiu Innu First Nation
P.O. Box 119
Sheshatshiu, Labrador
A0P 1M0
Tel: 709-497-8398
Fax: 709-497-8397

Chief John Nui
Mushuau Innu First Nation
P.O. Box 186
Natuashish, Labrador, NL
A0P 1A0
Tel: 709-478-8755
Fax: 709-478-8733

Reference: Proposed Port Expansion at Point Rousse, Baie Verte Peninsula

Dear Chief Hart and Chief Nui

I hope this letter finds you well.

We are reaching out to inform and engage with the Innu First Nation regarding a proposed infrastructure expansion project by **Point Rousse Marine Terminal Ltd.** The existing marine terminal located at Point Rousse, on the Baie Verte Peninsula, Newfoundland and Labrador, within the NAFO division 3K area.

SAI is proposing to expand and upgrade the existing port infrastructure at Point Rousse to support regional economic development and diversification. The proposed expansion includes:

- Upgrades to quayside infrastructure to improve loading and unloading capabilities
- Additional laydown and staging areas to support operational efficiency
- Shoreline infilling to increase usable space and accommodate future growth

This development is intended to enhance the terminal's capacity for aggregate exports and enable future multi-user operations, including bulk mineral shipments. Current vessel traffic at the existing marine terminal site is primarily associated with ship loading and exporting of bulk materials. The proposed expansion will involve the same types of activities, with a modest increase in vessel traffic. The primary function of this expansion is to increase storage and berthing availability; with increases to ocean going vessel traffic expected to be within 50% (10-20 vessels per year), and well within historical peaks at the facility.

Figure 1 illustrates the Project location for the proposed port expansion:

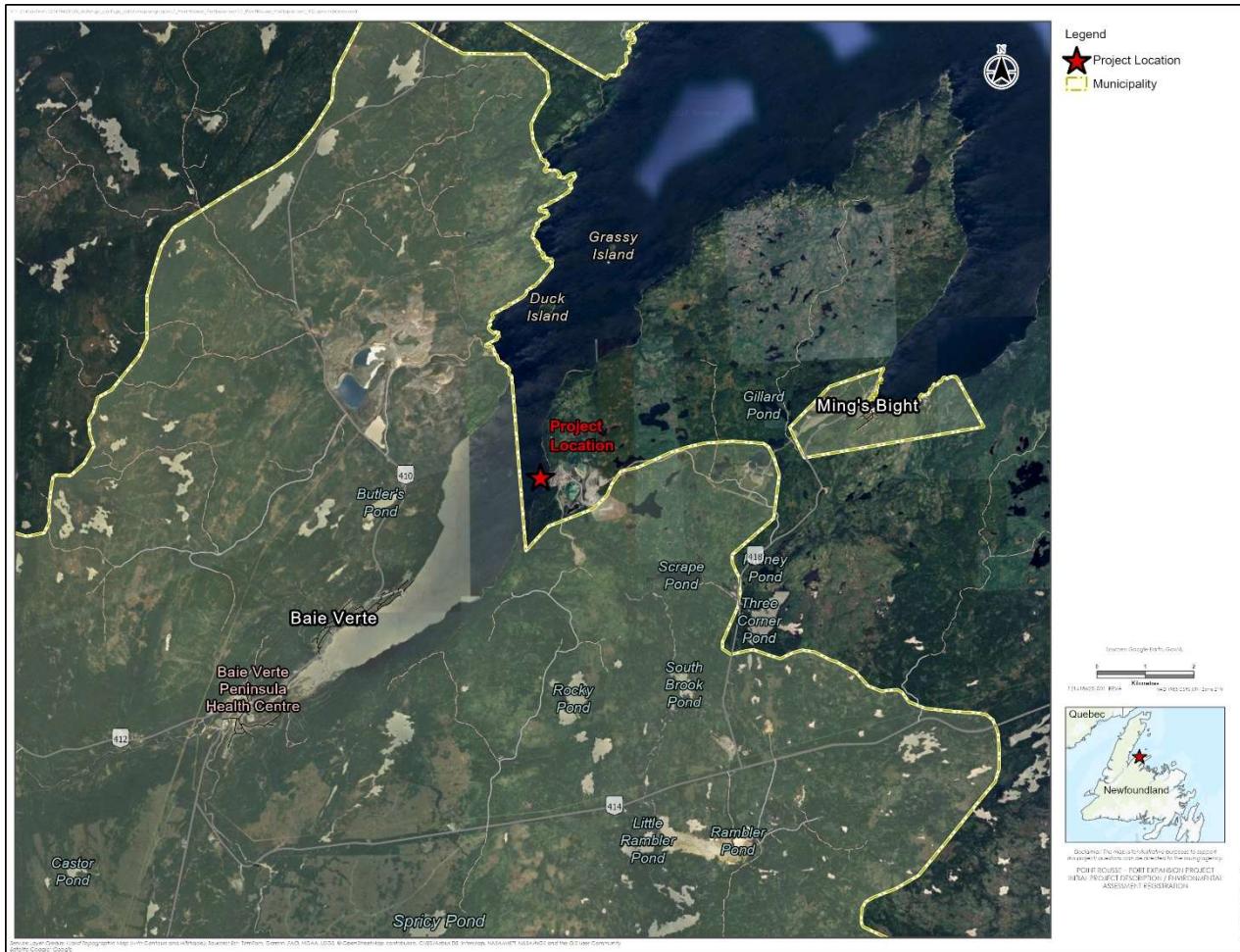


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We recognize and respect the importance of indigenous stakeholders and your stewardship of the lands and waters in this region. SAI welcomes your input and invites you to identify questions and concerns regarding this initiative. Your insights are important so that the Project reflects shared values and priorities. We would ask that you please provide any feedback by Oct 10th, 2025. We would also be pleased to arrange a meeting or provide further information at your convenience.

October 1st, 2025

Page 3 of 3

Reference: **Proposed Port Expansion at Point Rousse, Baie Verte Peninsula**

Please feel free to contact us at slewis@shorelineaggregates.net or 709 532 7925 to discuss next steps or to schedule a time to connect.

Thank you for your time and consideration to this initiative. We look forward to hearing from you again.

Best Regards,

A handwritten signature in blue ink, appearing to read "Shannon Lewis".

Shannon Lewis, Director Business Development

SHORELINE AGGREGATES INC.



Shoreline Aggregates Inc.
PO Box 184, 325 Highway 410
Baie Verte, NL, Canada, A0K 1B0

October 1st, 2025

Chief – Bradley Benoit
saqamaw@mfngov.ca
709-882-2470 ext 1265

Ross Hinks
Director Natural Resources
rhinks@mfngov.ca
709-822-3002

50 Miawpukek Drive, Conne River, NL A0H 1J0

Reference: Proposed Port Expansion at Point Rousse, Baie Verte Peninsula

Dear Chief Benoit,

I hope this letter finds you well.

We are reaching out to inform and engage with the Miawapuk First Nation Band regarding a proposed infrastructure expansion project by **Point Rousse Marine Terminal Ltd.** The existing marine terminal located at Point Rousse, on the Baie Verte Peninsula, Newfoundland and Labrador, within the NAFO division 3K area.

SAI is proposing to expand and upgrade the existing port infrastructure at Point Rousse to support regional economic development and diversification. The proposed expansion includes:

- Upgrades to quayside infrastructure to improve loading and unloading capabilities
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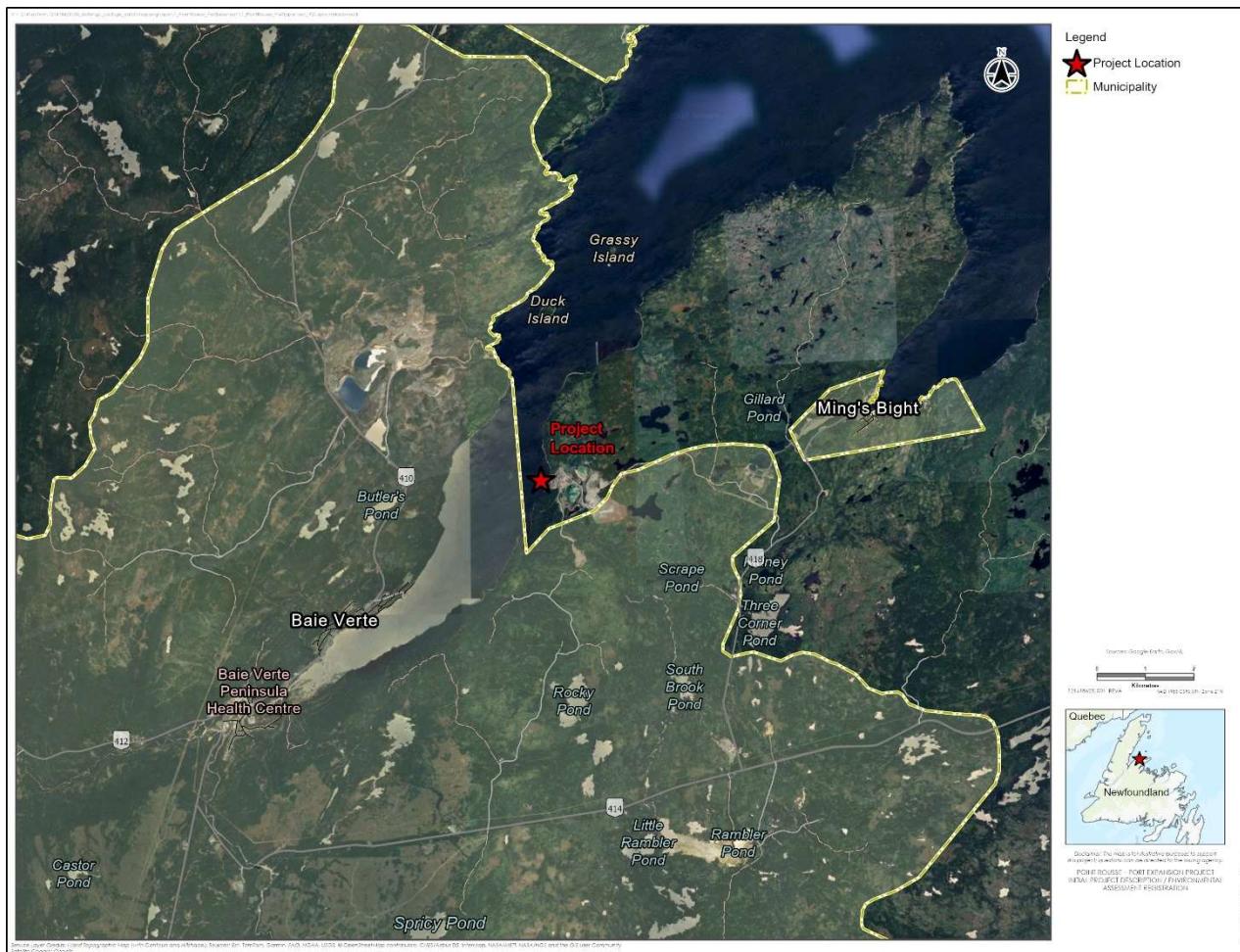


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October 1st, 2025

Page 3 of 3

Reference: **Proposed Port Expansion at Point Rousse, Baie Verte Peninsula**

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Best Regards,

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Shannon Lewis, Director Business Development

SHORELINE AGGREGATES INC.



Shoreline Aggregates Inc.
PO Box 184, 325 Highway 410
Baie Verte, NL, Canada, A0K 1B0

October 1st, 2025

Nunatsiavut Assembly

Johannes Lampe

President

Tel: 709-922-2942 X244-922-2942 X244

Email: Johannes.Lampe@nunatsiavut.com

25 Ikajuktauvik Road

PO Box 70

Nain, NL

A0P 1L0

Reference: Proposed Port Expansion at Point Rousse, Baie Verte Peninsula

Dear President Lampe,

I hope this letter finds you well.

We are reaching out to inform and engage with the Nunatsiavut Assembly regarding a proposed infrastructure expansion project by **Point Rousse Marine Terminal Ltd.** The existing marine terminal located at Point Rousse, on the Baie Verte Peninsula, Newfoundland and Labrador, within the NAFO division 3K area.

SAI is proposing to expand and upgrade the existing port infrastructure at Point Rousse to support regional economic development and diversification. The proposed expansion includes:

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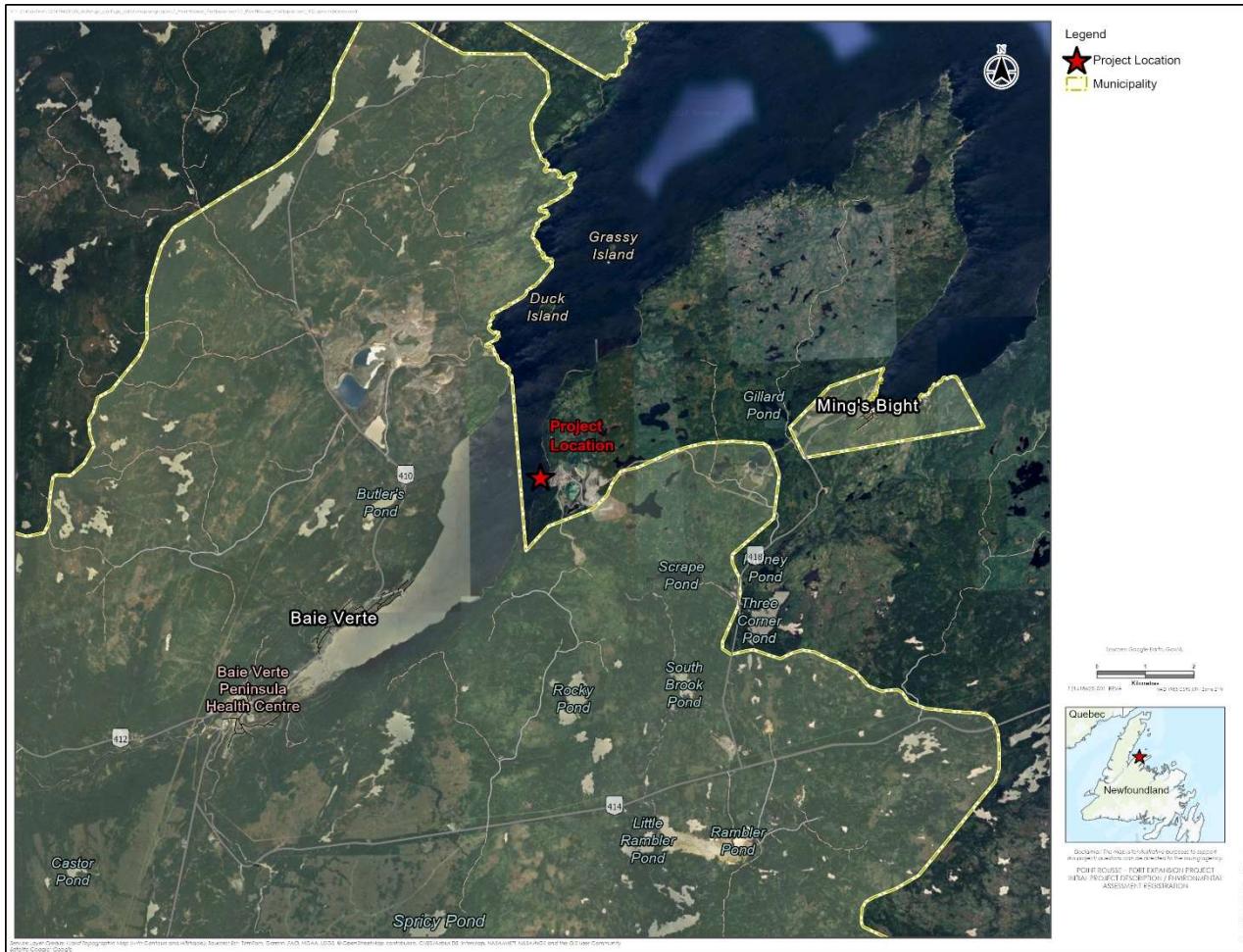


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October 1st, 2025

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Page 3 of 3

Reference: Proposed Port Expansion at Point Rousse, Baie Verte Peninsula

Please feel free to contact us at slewis@shorelineaggregates.net or 709 532 7925 to discuss next steps or to schedule a time to connect.

Thank you for your time and consideration to this initiative. We look forward to hearing from you again.

Best Regards,



Shannon Lewis, Director Business Development

SHORELINE AGGREGATES INC.

Cc

Terry Vincent
Minister of Lands & Natural Resources
Tel: 709-933-3777 X229
Terry.Vincent@nunatsiavut.com



Shoreline Aggregates Inc.
PO Box 184, 325 Highway 410
Baie Verte, NL, Canada, A0K 1B0

October 1st, 2025

Nunatukavut Community Council

Todd Russell
President
Tel: (709) 896-0592
trussell@nunatukavut.ca

Reference: Proposed Port Expansion at Point Rousse, Baie Verte Peninsula

Dear President Russell,

I hope this letter finds you well.

We are reaching out to inform and engage with the Nunatukavut Community Council regarding a proposed infrastructure expansion project by **Point Rousse Marine Terminal Ltd.** The existing marine terminal located at Point Rousse, on the Baie Verte Peninsula, Newfoundland and Labrador, within the NAFO division 3K area.

SAI is proposing to expand and upgrade the existing port infrastructure at Point Rousse to support regional economic development and diversification. The proposed expansion includes:

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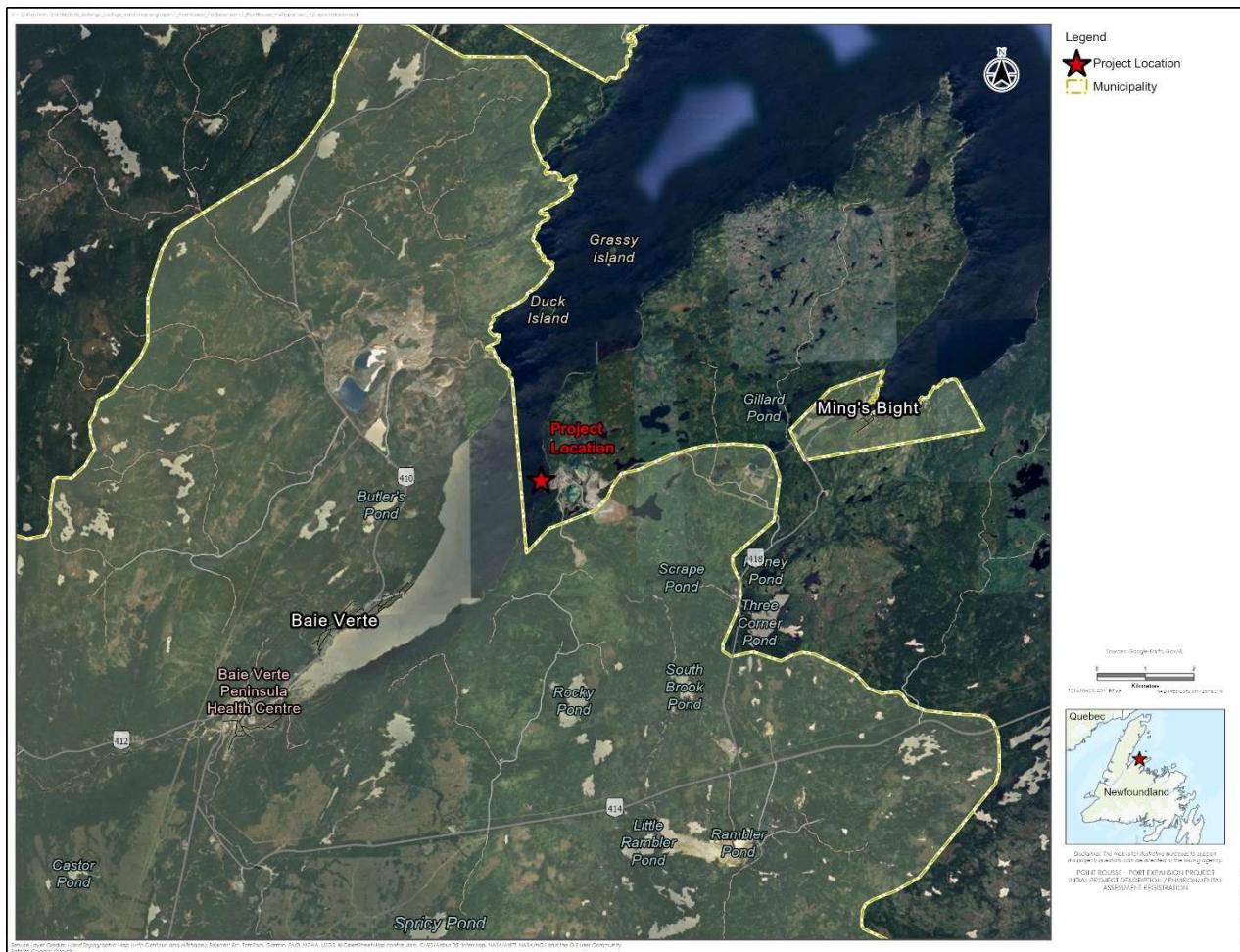


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October 1st, 2025

Page 3 of 3

Reference: **Proposed Port Expansion at Point Rousse, Baie Verte Peninsula**

Thank you for your time and consideration to this initiative. We look forward to hearing from you again.

Best Regards,

Shannon Lewis, Director Business Development

SHORELINE AGGREGATES INC.

c.c

George Russell Jr.

Director, Department of Environment and Natural Resources

Tel: (709) 896-0592, ext. 229

Fax: (709) 896-0594

grussell@nunatukavut.ca



Shoreline Aggregates Inc.
PO Box 184, 325 Highway 410
Baie Verte, NL, Canada, A0K 1B0

October 1st, 2025

Chief Jenny Brake

Qalipu Mi'kmaq

First Nation Band
3 Church Street
Corner Brook, NL
A2H 2Z4

Phone: 709-634-0996 ext: 0

Fax: 709-639-3997

chief@qalipu.ca

Reference: Proposed Port Expansion at Point Rousse, Baie Verte Peninsula

Dear Chief Brake,

I hope this letter finds you well. We are taking this opportunity to follow up to our previous engagement with yourself and Ian Sullivan in March 2025 regarding Shoreline Aggregates. As it has been sometime, we felt it would be appropriate to do so again as our project is further progressing.

We are reaching out to inform and engage with the Qalipu Mi'kmaq First Nation Band regarding a proposed infrastructure expansion project by **Point Rousse Marine Terminal Ltd.** The existing marine terminal located at Point Rousse, on the Baie Verte Peninsula, Newfoundland and Labrador, within the NAFO division 3K area.

SAI is proposing to expand and upgrade the existing port infrastructure at Point Rousse to support regional economic development and diversification. The proposed expansion includes:

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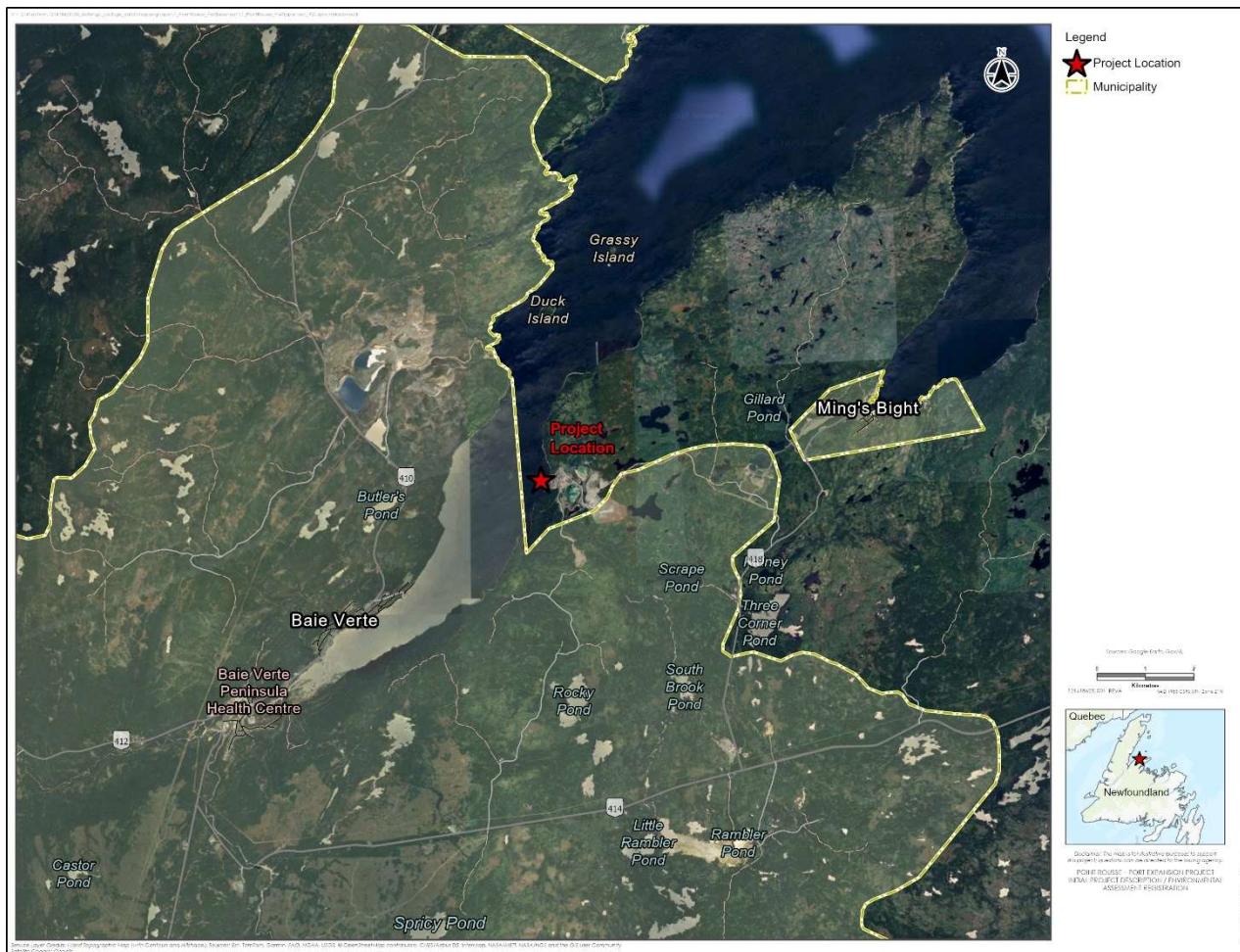


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Please feel free to contact us at slewis@shorelineaggregates.net or 709 532 7925 to discuss next steps or to schedule a time to connect.

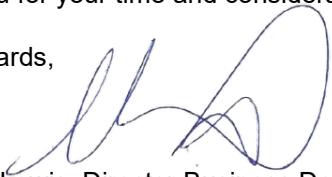
October 1st, 2025

Page 3 of 3

Reference: **Proposed Port Expansion at Point Rousse, Baie Verte Peninsula**

Thank you for your time and consideration to this initiative. We look forward to hearing from you again.

Best Regards,



Shannon Lewis, Director Business Development

SHORELINE AGGREGATES INC.

CC.

Ian Sullivan, Director of Environment & Natural Resources
isullivan@qalipu.ca



325 Highway 410 PO Box 184
Baie Verte, NL A0K-1B0
T: (709) 532-4642 F: (709) 532-4643

January 28, 2025

Chief Jenny Brake

Qalipu Mi'kmaq

First Nation Band

3 Church Street

Corner Brook, NL

A2H 2Z4

Phone: 709-634-0996 ext: 0

Fax: 709-639-3997

chief@qalipu.ca

Subject: Request for Support for the Port Rousse Expansion Project

Dear Chief Brake,

Shoreline Aggregates Inc. is a family-owned company proudly based on the Baie Verte Peninsula, Newfoundland and Labrador. Since our establishment in 2016, we have grown to become a leader in sustainable aggregate production and export, providing employment opportunities for over 100 skilled personnel in our community. As we continue to grow, we are dedicated to fostering inclusivity, supporting local communities, and promoting environmental sustainability in all our operations.

We are seeking your valued support for our Port Rousse Expansion Project, which will significantly enhance our capacity to serve global markets while advancing a green and blue circular economy model. By expanding port facilities, recycling mine waste into high-quality aggregates, and investing in sustainable practices, this project will not only benefit our business but also create meaningful economic and social impacts in the region.

Specifically, the Port Rousse Expansion will:

- Create new job opportunities and training programs, with a focus on engaging inclusive and local talent and businesses.
- Enhance the local economy through increased export capacity and partnerships with community-based suppliers.
- Implement state-of-the-art environmental practices, ensuring responsible resource utilization and a reduced carbon footprint.



325 Highway 410 PO Box 184
Baie Verte, NL A0K-1B0
T: (709) 532-4642 F: (709) 532-4643

We recognize the importance of collaboration and respectfully request your support in this endeavor. Your endorsement would greatly strengthen our ability to move forward with this project and ensure its success. A letter of support from your organization would demonstrate our shared commitment to economic growth, environmental stewardship, and community well-being.

For your reference, I have attached a detailed project summary outlining the scope and benefits of the Port Rousse Expansion. I would be happy to meet with you to discuss this further or answer any questions you may have.

Thank you for considering our request. Your consideration and leadership are greatly valued, and we look forward to the opportunity to collaborate in creating a legacy of sustainability and prosperity for the region.

Sincerely,

Shannon Lewis
Director Business Development
Shoreline Aggregates Inc.
slewis@shorelineaggregates.net
Cell: 709 532 7925



TOWN OF BAIE VERTE
32 HIGHWAY 410
P.O. Box 218
BAIE VERTE, NL A0K 1B0
TEL: 709.532.8222 FAX: 709.532.4134
WWW.TOWNOFBAIEVERTE.CA
TOWNOFBAIEVERTE@HOTMAIL.COM

August 14, 2025

Shoreline Aggregates Inc.
325 Highway 410
P.O Box 184
Baie Verte, NL A0K 1B0

Subject: Letter of Support – Point Rousse Port Expansion

To Whom It May Concern,

On behalf of the Town of Baie Verte, we are pleased to offer our full support for the proposed expansion of the Point Rousse Port and Terminal facilities by Shoreline Aggregates Inc.

The Point Rousse Port is a critical regional asset, providing essential marine infrastructure that supports not only Shoreline Aggregates' operations but also the broader economic development of the Baie Verte Peninsula and surrounding communities. The planned expansion, including the addition of a new berth, increased laydown and stockpile areas, enhanced storage capacity, and expanded capacity for transportation logistics and storage of critical minerals, will substantially improve the region's export capabilities, operational efficiency, and capacity for diversified products.

The Town recognizes the direct and indirect benefits this project will bring, including:

- Significant job creation during both construction and ongoing operations
- Increased opportunities for local businesses and service providers
- Strengthened export competitiveness to established Eastern Seaboard, Gulf States, Caribbean, and South American markets
- Enhanced infrastructure for future community and industrial use
- Strategic logistical advantages for current and future mining operations, including Firefly Metals, Maritime Resources, and other sector developments
- Advancement of the extraction, processing, transportation, and storage of **critical minerals**, in alignment with the *Government of Canada's Critical Minerals Strategy*.

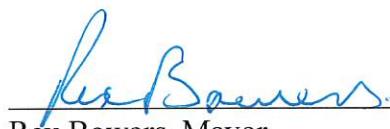
We commend Shoreline Aggregates for its commitment to environmentally responsible development and for working collaboratively with local stakeholders to maximize community benefits while minimizing environmental impacts.



TOWN OF BAIE VERTE
32 HIGHWAY 410
P.O. Box 218
BAIE VERTE, NL A0K 1B0
TEL: 709.532.8222 FAX: 709.532.4134
WWW.TOWNOFBAIEVERTE.CA
TOWNOFBAIEVERTE@HOTMAIL.COM

The Town of Baie Verte fully supports the Point Rousse Port Expansion and urges government agencies, regulatory authorities, and funding partners to work with Shoreline Aggregates to bring this important project to fruition.

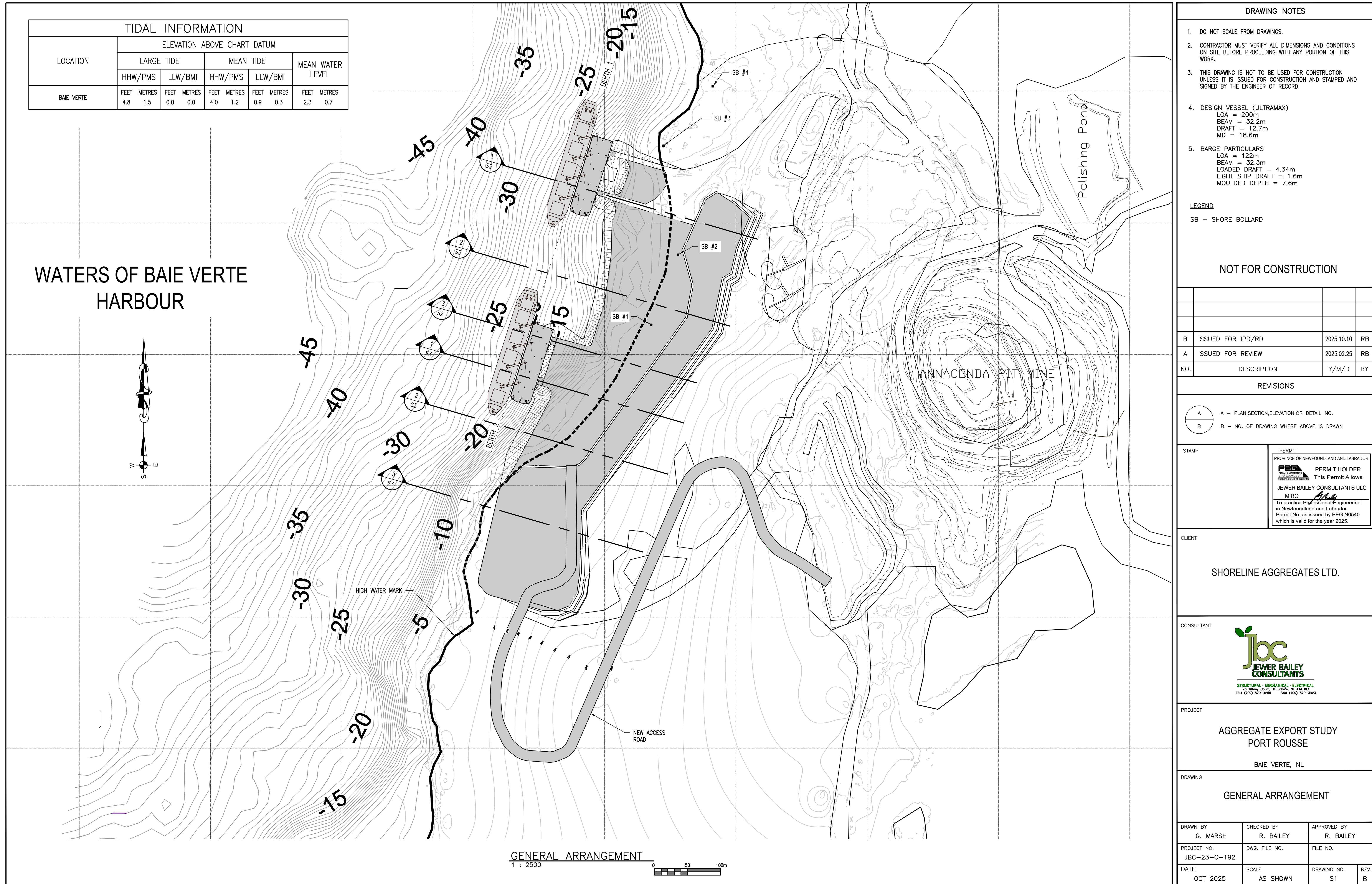
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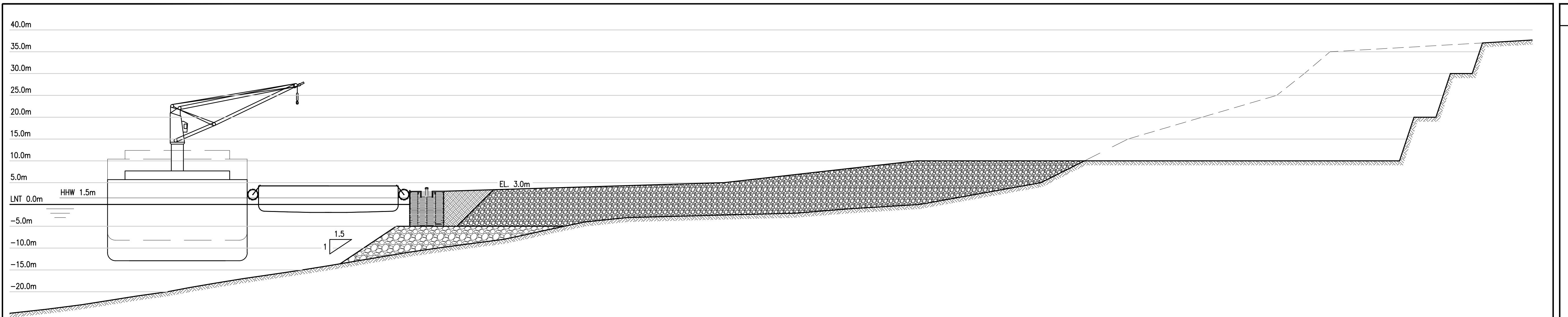


Rex Bowers, Mayor

Town of Baie Verte

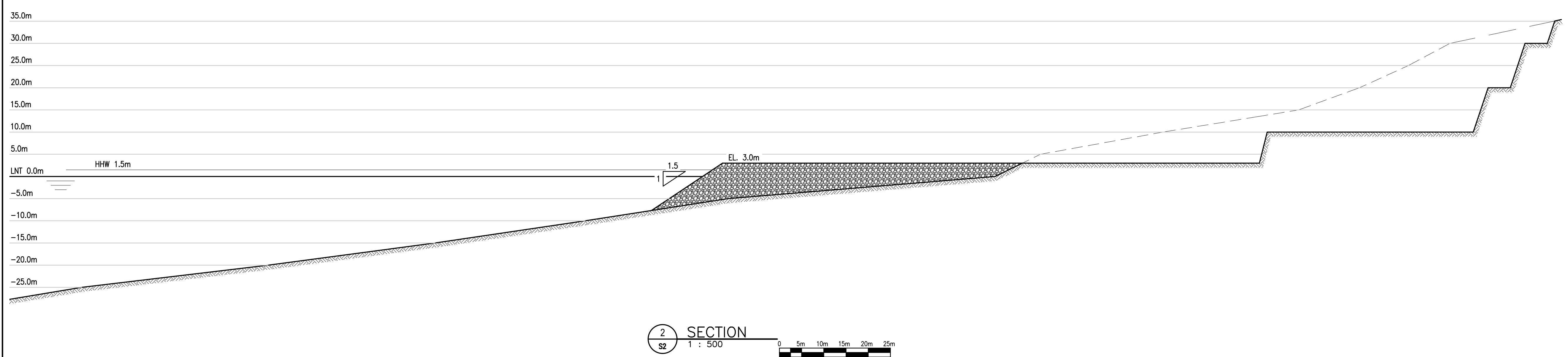
APPENDIX B ENGINEERING DRAWINGS





DRAWING NOTES		
1. DO NOT SCALE FROM DRAWINGS.		
2. CONTRACTOR MUST VERIFY ALL DIMENSIONS AND CONDITIONS ON SITE BEFORE PROCEEDING WITH ANY PORTION OF THIS WORK.		
3. THIS DRAWING IS NOT TO BE USED FOR CONSTRUCTION UNLESS IT IS ISSUED FOR CONSTRUCTION AND STAMPED AND SIGNED BY THE ENGINEER OF RECORD.		
4. DESIGN VESSEL (ULTRAMAX) LOA = 200m BEAM = 32.2m DRAFT = 12.7m MD = 18.6m		
5. BARGE PARTICULARS LOA = 122m BEAM = 32.3m LOADED DRAFT = 4.34m LIGHT SHIP DRAFT = 1.6m MOULDED DEPTH = 7.6m		
<u>LEGEND</u>		
SB - SHORE BOLLARD		

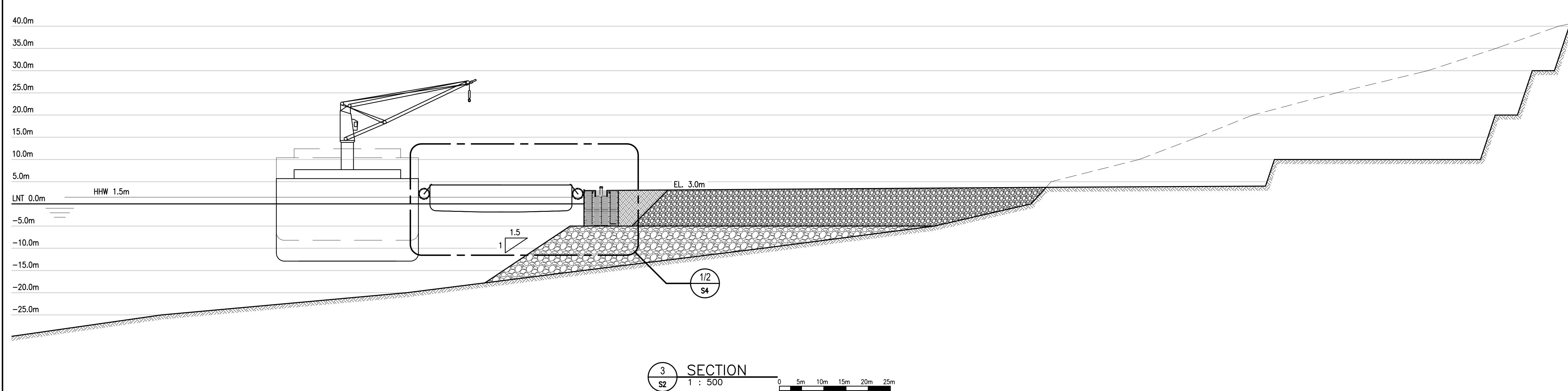
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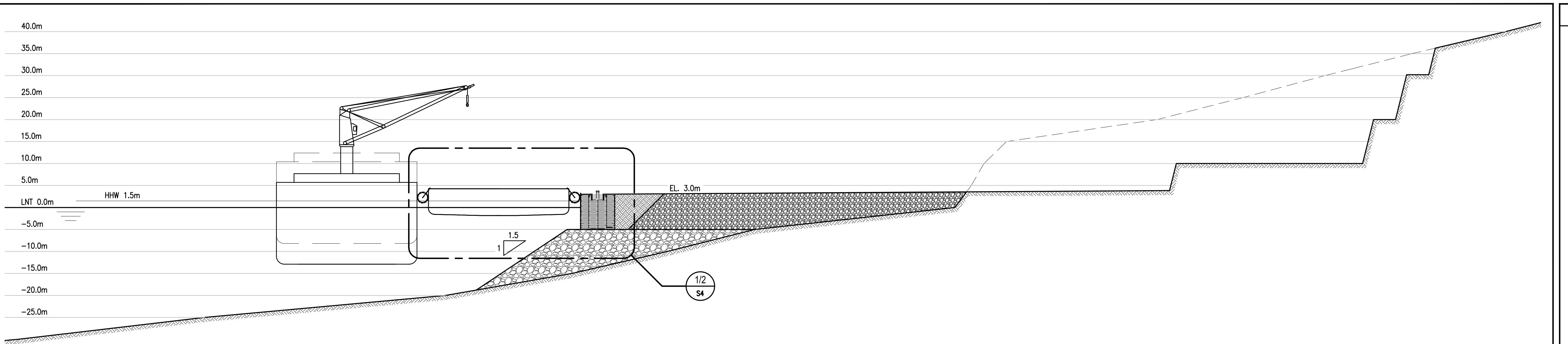
B	ISSUED FOR IPD/RD	2025.10.10 RB
A	ISSUED FOR REVIEW	2025.02.25 RB
NO.	DESCRIPTION	Y/M/D BY

REVISIONS

A	A - PLAN, SECTION, ELEVATION, OR DETAIL NO.
B	B - NO. OF DRAWING WHERE ABOVE IS DRAWN
STAMP	PERMIT PROVINCE OF NEWFOUNDLAND AND LABRADOR PEG PERMIT HOLDER Newfoundland and Labrador PROFESSIONAL ENGINEER REGISTRATION JEWER BAILEY CONSULTANTS ULC MIRC: <i>Ma</i> To practice Professional Engineering in Newfoundland and Labrador, Permit No. as issued by PEG N0540 which is valid for the year 2025.
CLIENT	SHORELINE AGGREGATES LTD.
CONSULTANT	JBC JEWER BAILEY CONSULTANTS STRUCTURAL - MECHANICAL - ELECTRICAL 75 Tiffey Court, St. John's, NL A1A 0L1 TEL: (709) 759-4222 FAX: (709) 759-3423



DRAWN BY	CHECKED BY	APPROVED BY
G. MARSH	R. BAILEY	R. BAILEY
PROJECT NO.	DWG. FILE NO.	FILE NO.
JBC-23-C-192		
DATE	SCALE	DRAWING NO.
OCT 2025	AS SHOWN	S2
	REV.	B

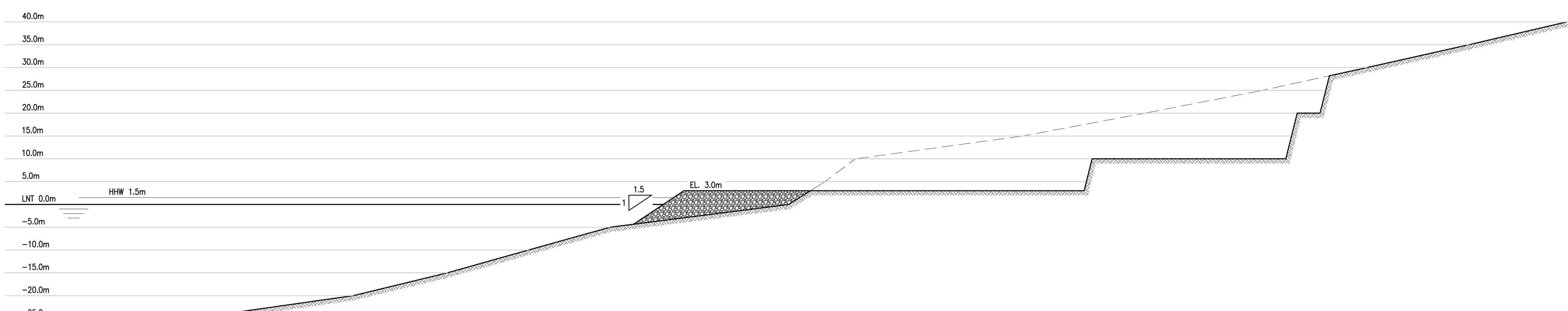


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SB - SHORE BOLLARD

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REVISIONS

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CLIENT

SHORELINE AGGREGATES LTD.

CONSULTANT	 JEWER BAILEY CONSULTANTS STRUCTURAL - MECHANICAL - ELECTRICAL 75 Tiffey Court, St. John's, NL A1A 0L1 TEL: (709) 759-4222 FAX: (709) 759-3423
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PROJECT
AGGREGATE EXPORT STUDY
PORT ROUSSE

BAIE VERTE, NL

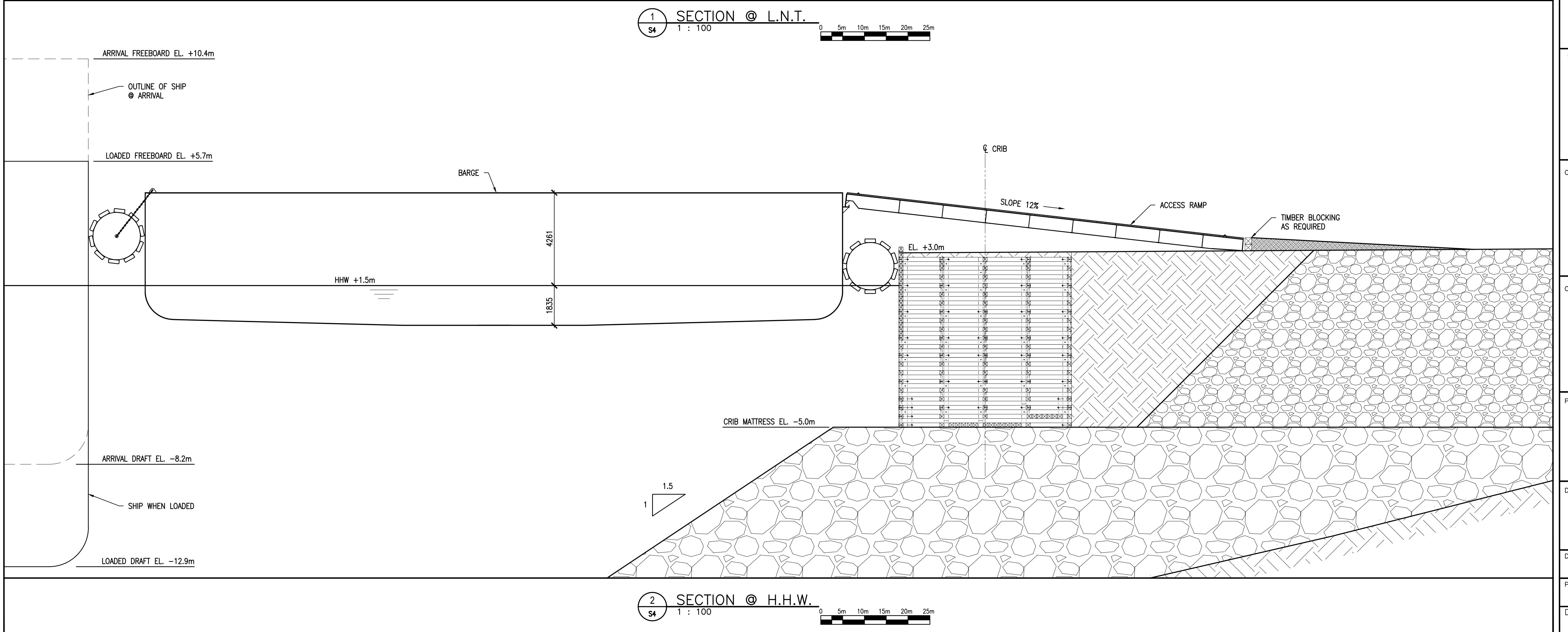
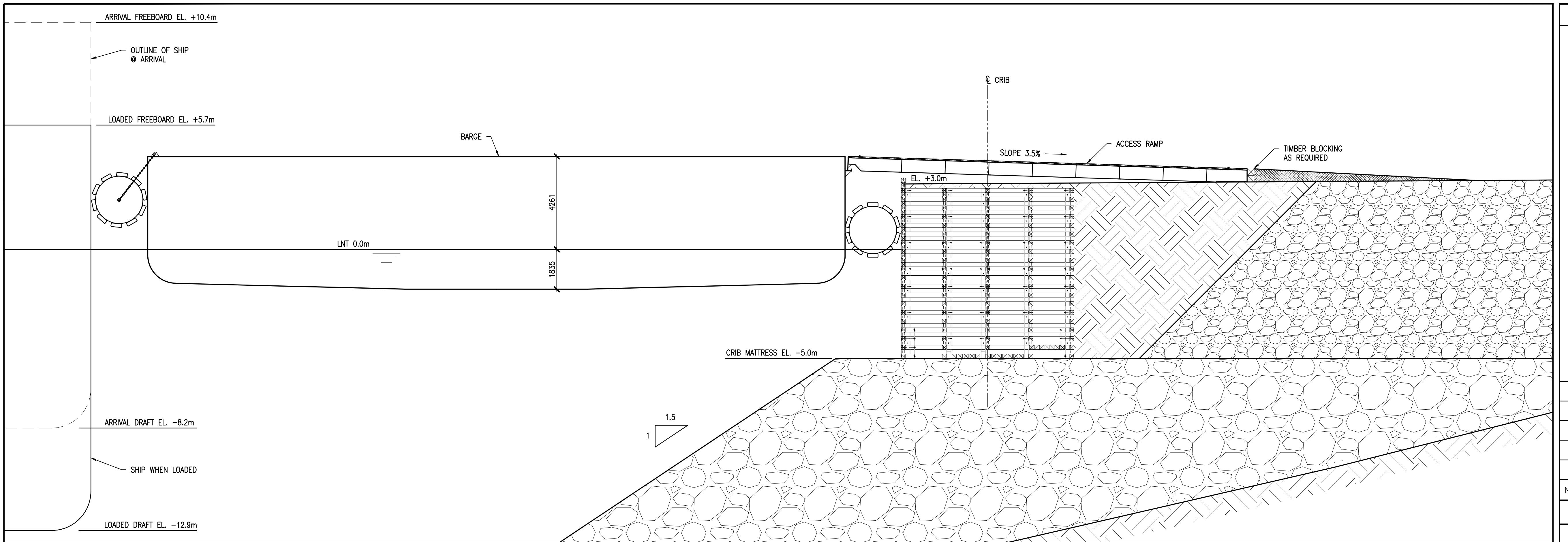
DRAWING

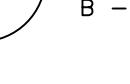
SECTIONS

DRAWN BY G. MARSH CHECKED BY R. BAILEY APPROVED BY R. BAILEY

PROJECT NO. JBC-23-C-192 DWG. FILE NO. FILE NO.

DATE OCT 2025 SCALE AS SHOWN DRAWING NO. S3 REV. B



DRAWING NOTES		
1. DO NOT SCALE FROM DRAWINGS.		
2. CONTRACTOR MUST VERIFY ALL DIMENSIONS AND CONDITIONS ON SITE BEFORE PROCEEDING WITH ANY PORTION OF THIS WORK.		
3. THIS DRAWING IS NOT TO BE USED FOR CONSTRUCTION UNLESS IT IS ISSUED FOR CONSTRUCTION AND STAMPED AND SIGNED BY THE ENGINEER OF RECORD.		
4. DESIGN VESSEL (ULTRAMAX) LOA = 200m BEAM = 32.2m DRAFT = 12.7m MD = 18.6m		
5. BARGE PARTICULARS LOA = 122m BEAM = 32.3m LOADED DRAFT = 4.34m LIGHT SHIP DRAFT = 1.6m MOULDED DEPTH = 7.6m		
LEGEND		
SB - SHORE BOLLARD		
NOT FOR CONSTRUCTION		
B ISSUED FOR IPD/RD	2025.10.10	RB
A ISSUED FOR REVIEW	2025.02.25	RB
NO. DESCRIPTION	Y/M/D	BY
REVISIONS		
 A - PLAN, SECTION, ELEVATION, OR DETAIL NO.  B - NO. OF DRAWING WHERE ABOVE IS DRAWN		
STAMP	PERMIT PROVINCE OF NEWFOUNDLAND AND LABRADOR PEG Newfoundland and Labrador PROFESSIONAL ENGINEERING BOARD PERMIT HOLDER JEWER BAILEY CONSULTANTS ULC MIRC To practice Professional Engineering in Newfoundland and Labrador. Permit No. as issued by PEG N0540 which is valid for the year 2025.	
CLIENT	SHORELINE AGGREGATES LTD.	
CONSULTANT	 JEWER BAILEY CONSULTANTS STRUCTURAL - MECHANICAL - ELECTRICAL 75 Tiffey Court, St. John's, NL A1A 0L1 TEL: (709) 759-4222 FAX: (709) 759-3423	
PROJECT	AGGREGATE EXPORT STUDY PORT ROUSSE BAIE VERTE, NL	
DRAWING	SECTIONS	
DRAWN BY G. MARSH	CHECKED BY R. BAILEY	APPROVED BY R. BAILEY
PROJECT NO. JBC-23-C-192	DWG. FILE NO.	FILE NO.
DATE OCT 2025	SCALE AS SHOWN	DRAWING NO. S4
		REV. B

APPENDIX C DYNO NOBEL LETTER ON BLASTING IMPACTS



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10/25/2025

Shannon Lewis
Director, Business Development
Point Rousse Marine Terminal Ltd.

Dear Mr. Lewis,

With respect to your request for supporting documentation regarding potential impacts from proposed blasting activities at the Point Rousse Marine Terminal Ltd. Port Expansion Project, we are pleased to provide the following information for consideration.

As part of the planned development, blasting will be required to establish the laydown area adjacent to the existing port facilities with the objective of this work being to create a level surface suitable for equipment storage and material handling in support of the ongoing port expansion. To provide context on the expected vibration levels and potential impacts to nearby infrastructure, we have referenced predictive modeling of the size & scope of the proposed blasting at the port, historic data from previous blasting operations conducted at the granite quarry, where similar conditions and blasting techniques were used as well as predictive modeling of full-scale production blasting.

Predictive Modeling (Proposed blasting near the port)

Please see Figure 1 below for predicted peak particle velocity (PPV) levels at 300m, 400m & 600m respectively.

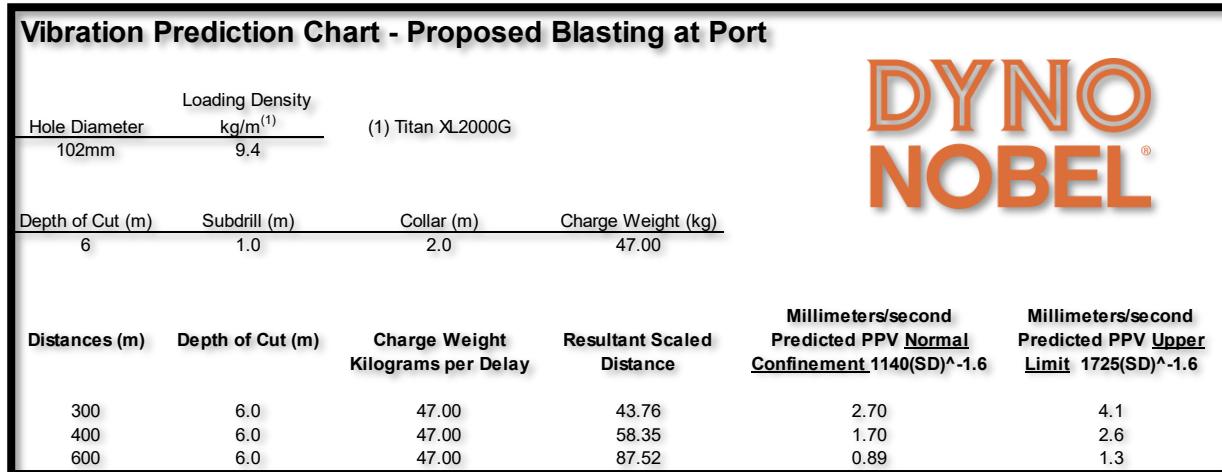


Figure 1

Summary of Historic Blasting (South Brook Quarry)

Blast Date: May 2, 2020

Blast Pattern: 253 holes, 102mm diameter, drilled on a 2.75m x 2.75m pattern

Hole Depths: 3m – 7m

Estimated Volume: ~7,000 m³ of material

Seismograph Monitoring: A seismograph was deployed approximately 435m from the blast site and set to trigger at 25 mm/sec. No vibration reading was recorded for this event, indicating ground vibration levels were below the trigger threshold.

Predictive Modeling (Full scale/full production blasting conditions)

Using scaled distance calculations and typical production blast parameters for full scale operations, PPV levels for full-scale blasting are summarized in Figure 2 below.

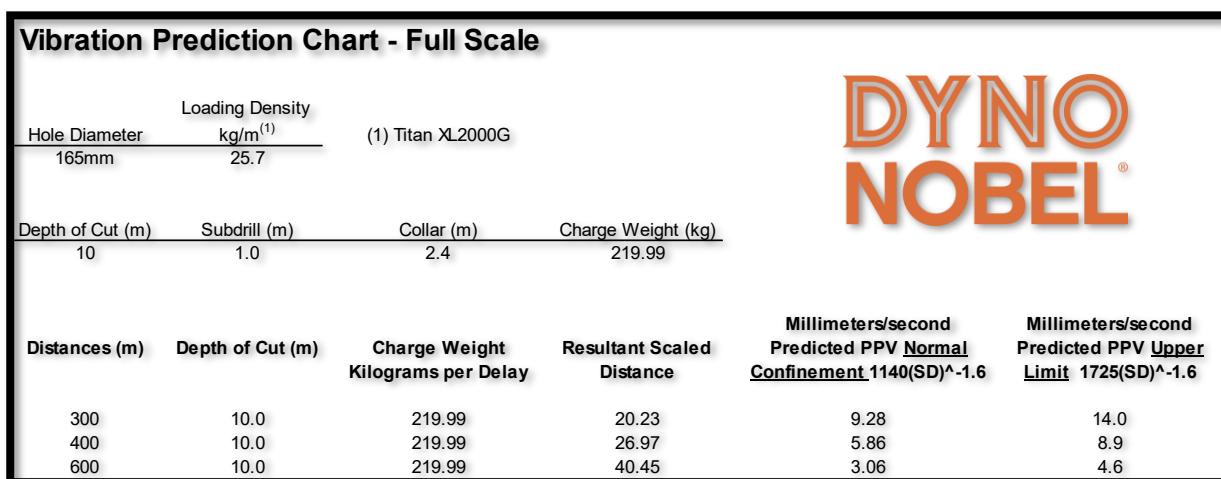


Figure 2

As shown in Figures 1 & 2, vibration levels decrease significantly with distance. Even under full-scale production conditions and at the upper limits of confinement, vibration levels at 600m are predicted to be approximately **4.6 mm/sec**, which would be the equivalent of a loaded dump truck passing by a few meters away.

Based on historical data and predictive modelling, the proposed blasting activities for the laydown area are not expected to have any adverse impact on nearby infrastructure or existing facilities. All blasting will be carried out by qualified personnel in accordance with applicable regulations and best practices, with seismograph monitoring to verify ground vibration levels during blasting operations.

We trust this information will satisfy your request. Should additional details or modeling data be required, we would be pleased to provide further assistance.

Best regards,



Gerald Bursey
Sales Manager – Commercial Operations NL
Dyno Nobel