

Point Rousse Marine Terminal Ltd.

**Point Rousse – Port Expansion
Project**

**INITIAL PROJECT DESCRIPTION
SUMMARY**

Submitted to:

The Impact Assessment Agency of Canada

Submitted by:

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ACRONYMS AND ABBREVIATIONS

AC CDC	Atlantic Canada Conservation Data Centre
CO ₂ e	Carbon Dioxide Equivalent
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
GHG	Greenhouse Gas
ha	hectare
IAA	<i>Impact Assessment Act</i>
IAAC	Impact Assessment Agency of Canada
IPD	Initial Project Description
km	kilometre
km ²	square kilometre
m	metre
NAFO	Northwest Atlantic Fisheries Organization
NL	Newfoundland and Labrador
NLDECCC	Newfoundland and Labrador Department of Environment, Conservation and Climate Change
NL ESA	NL <i>Endangered Species Act</i>
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

1 INTRODUCTION

Point Rousse Marine Terminal Ltd. (PRMT) (the Proponent) is pleased to submit this Initial Project Description (IPD) Summary for the Point Rousse – Port Expansion Project (the Project) in accordance with the *Impact Assessment Act*.

The Project involves the construction, operation, and eventual closure of expanded marine terminal facilities to support primarily the export of construction aggregate and armourstone from Shoreline Aggregates Inc.'s (SAI's) quarry operations. It is subject to both federal and provincial environmental assessment processes, requiring submission of an Initial Project Description to the Impact Assessment Agency of Canada (IAAC) in accordance with the *Impact Assessment Act* (IAA) and submission of a Registration Document to the Newfoundland and Labrador (NL) Department of Environment, Conservation and Climate Change (NLDECCC) under the NL *Environmental Protection Act*. To streamline regulatory review, a combined document has been prepared addressing both federal and provincial requirements. It outlines the Project's potential environmental, social, and economic impacts, along with proposed mitigation measures to support environmentally responsible development.

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 marine terminal infrastructure at Point Rousse, located on the Baie Verte Peninsula, NL (Figure 1.1 and Figure 1.2). PRMT may contract some operational services to SAI and other third parties, while retaining ownership of the Project.

The Point Rousse Project will expand and upgrade marine terminal facilities to support regional economic growth, industrial diversification, and Canada's low-carbon transition. The expansion will increase SAI's aggregate export capacity and provide multi-user infrastructure for bulk minerals and metals from development and regional mining projects. Positioned on the Baie Verte Peninsula near a cluster of critical mineral developments, the Project addresses infrastructure gaps, reduces trucking emissions, lowers costs, and strengthens supply chains in alignment with the Government of Canada's Critical Minerals Strategy.

Since 2016, SAI has exported construction-grade aggregates from the Point Rousse Marine Terminal under strong environmental/regulatory governance and community support. To sustain operations and meet growing resource demands, PRMT proposes adding a second berth to accommodate expanded products like armourstone, extend operations by 30+ years, and create synergies with existing infrastructure. With new permitted quarries supplying high-quality rock, SAI will diversify exports while maintaining environmental stewardship.

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. PRMT is currently engaged in commercial negotiations with FireFly Metals Canada Ltd. (FireFly) regarding the future shipment of FireFly's concentrate product from their Green Bay Ming Mine Project, which was recently released from the provincial environmental assessment (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.

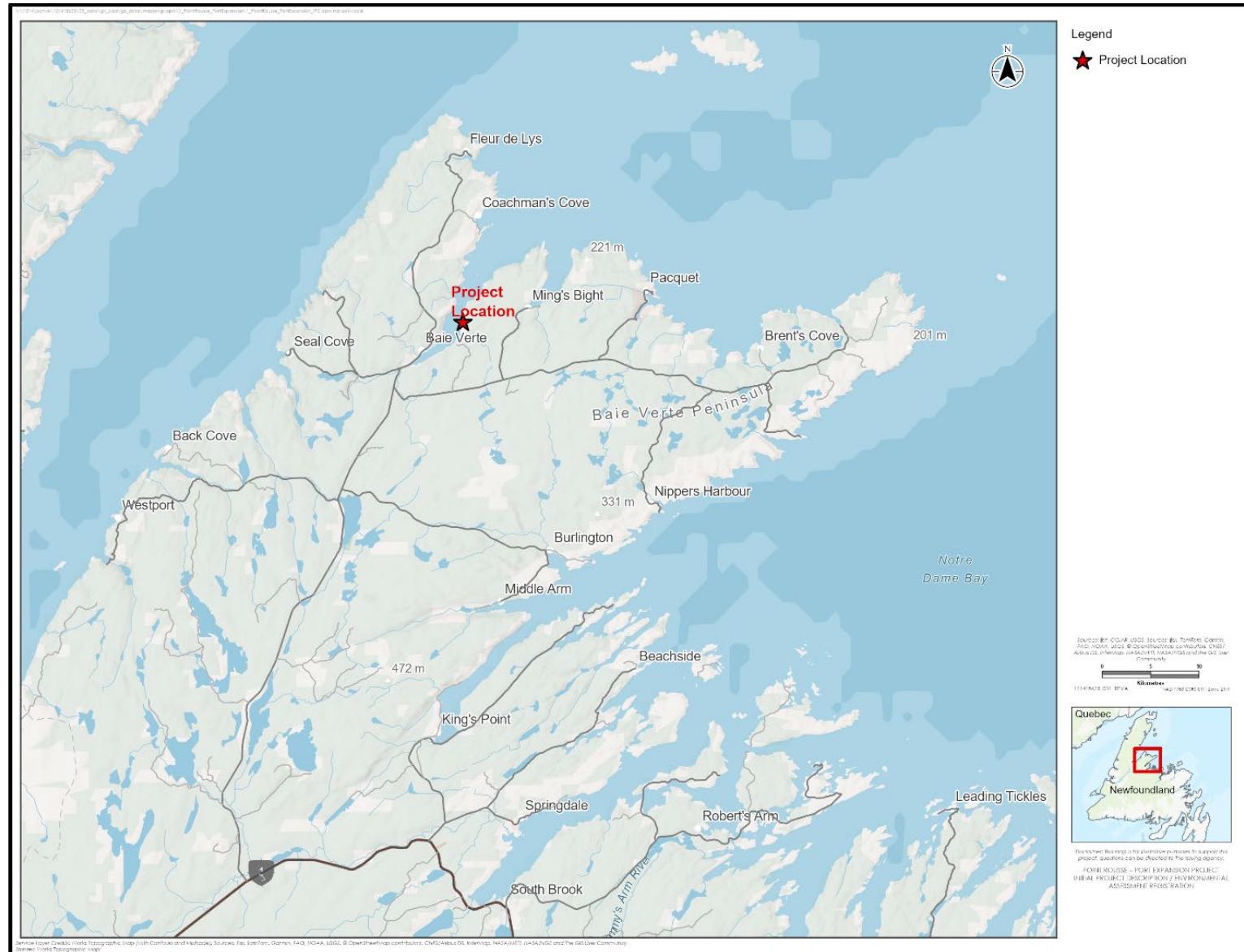


Figure 1.1 Project Location



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

2 PART A: GENERAL INFORMATION

Project Name: Point Rousse – Port Expansion Project (the Project)

Sector: Marine Operations
Location: Pine Cove, Baie Verte, NL
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2.1 SUMMARY OF ENGAGEMENT

PRMT, through SAI, has actively engaged stakeholders since 2016 via regional mining events and public forums, including the Baie Verte Mining Conference, Chamber of Commerce Annual General Meetings, Small Business Week luncheons, and government meetings.

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

Engagement activities have involved presentations, meetings, letters, and public postings. These efforts aim to maintain transparency, share Project updates, and gather feedback. No concerns have been raised to date regarding the marine terminal expansion or existing operations. PRMT will continue outreach through quarterly updates, annual events, and online platforms (SAI's website and social media). A public enquiry form is monitored regularly to address questions.

2.2 INDIGENOUS ENGAGEMENT

PRMT acknowledges the contributions of Indigenous peoples to environmental knowledge and has engaged with communities across NL as part of its Project planning. While there are no designated Indigenous lands within the Project area, PRMT recognizes that members of the Qalipu Mi'kmaq First Nation (Qalipu), who are distributed across 67 communities, may be affected. Engagement with Qalipu has included emails, letters, and a meeting with the Qalipu Chief and Director of Industry, Energy and Technology to share Project details and invite feedback. PRMT has also recently engaged with other Indigenous groups, including the Miawpukek First Nation, Nunatsiavut Assembly, Innu First Nation, and NunatuKavut Community Council. 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.

PRMT remains committed to ongoing engagement and will notify Indigenous groups when the IPD / Registration Document is submitted, including a link for access. Communication will continue throughout the life of the Project, and PRMT will monitor the effectiveness of its outreach methods to support meaningful participation and transparency. Should PRMT receive responses to the letters sent out, 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.

2.3 REGIONAL AND STRATEGIC ASSESSMENTS

2.3.1 Regional Assessments

Regional assessments, as defined, refers to a 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 the IAA, as well as studies/plans undertaken 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.

2.3.2 Strategic Assessments

Under the IAA, strategic assessments help address broad issues like climate change. Environment and Climate Change Canada (ECCC) developed a strategic climate assessment under this section, supported by technical guidance on greenhouse gas (GHG) quantification, mitigation, and climate resilience. PRMT has evaluated GHG emissions for both construction and operations and is committed to reducing impacts throughout the Project's life. Measures already implemented, such as switching the port from diesel to grid power, have reduced emissions intensity. PRMT continues to track and report emissions and aims for further reductions through new technologies and operational improvements.

3 PART B: PROJECT INFORMATION

3.1 NEED FOR THE PROJECT

The Project addresses growing demand for high-quality construction aggregates and armourstone in domestic and international markets. Since 2016, SAI has exported crushed aggregate through PRMT's marine terminal, initially relying on a 10 million tonne stockpile of legacy waste rock from former mining operations. With this supply nearing depletion, two new quarries have been developed to provide high-grade rock for diverse civil engineering applications. Strict quality control requirements and the need to prevent cross-contamination between rock types have created logistical challenges, driving the need for additional infrastructure to segregate materials during stockpiling, handling, and shipping.

The expansion is important as no equivalent export-capable port exists in the region. Without it, transporting aggregates or armourstone to alternate ports would increase costs, emissions, and safety risks, undermining competitiveness and regional economic benefits. Furthermore, FireFly's proposed Green Bay Ming Mine Project can use 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.

3.2 PURPOSE OF THE PROJECT

The Project aims to maintain long-term export competitiveness by expanding the Point Rousse marine terminal to efficiently ship aggregate materials from SAI's two new quarries. These deposits provide distinct high-quality rock types for global civil engineering and coastal infrastructure markets, requiring strict segregation to meet international standards for traceability and quality assurance. This operational need drives the development of dedicated laydown areas and material handling systems to prevent cross-contamination. Without this expansion, the lack of comparable deep-water export facilities would force reliance on distant ports, increasing costs, emissions, and safety risks, while jeopardizing regional economic benefits and employment.

Beyond aggregates, the upgraded terminal will support mineral and metal exports from regional projects. By reducing transportation bottlenecks and enabling efficient access to international markets, the Project aligns with the Government of Canada's Critical Minerals Strategy. The addition of a second berth will allow simultaneous or alternating vessel loading, maintain segregation of product types, and support SAI's growth strategy for large-scale infrastructure projects. Overall, the expansion enhances operational efficiency, sustains regional economic development, and improves the resilience of NL's export infrastructure.

3.3 PROVISIONS IN THE PHYSICAL ACTIVITIES REGULATIONS

Under the IAA, the Project qualifies as a designated physical activity under Section 53 of the *Physical Activities Regulations*, as it involves constructing a new permanent berth designed to handle vessels exceeding 25,000 deadweight tonnes (DWT). The proposed berth will accommodate ships up to 80,000 DWT, meeting the criteria for federal impact assessment. No other project activity considered for the Project is described in the *Physical Activities Regulations*.

At the provincial level, the EA Division of NLDECC has confirmed that the Project is a designated undertaking under Section 26 of Newfoundland and Labrador's *Environmental Assessment Regulations* and must be registered under the NL *Environmental Protection Act*. A coordinated federal-provincial review will be undertaken to support a thorough assessment.

3.4 DESCRIPTION OF PROJECT COMPONENTS AND ACTIVITIES

The Project is planned to occur over a multiyear construction phase, 2026/27, pending regulatory approvals. It involves expanding the existing marine terminal with a new berth, shoreline infilling, a rock-filled causeway, dock structure, and barge. Supporting infrastructure includes land side storage / laydown areas and a port access road. No dredging is required, but blasting is expected for land-side construction. Power will be extended from the existing terminal; water and sewer services may be added later if needed.

The new berth will follow similar construction and operation methods as the current facility, which has been operating since 2016 and has exported over three million tonnes of aggregate. Existing marine services, like pilotage and vessel traffic management, are already in place and will continue to support operations. Alternatives for the dock and barge structures are being considered, with final design decisions based on cost and functionality.

3.5 PROJECT COMPONENTS

The Project has both land-based and marine-based components which are described below. Project components are illustrated in Figure 3.1.

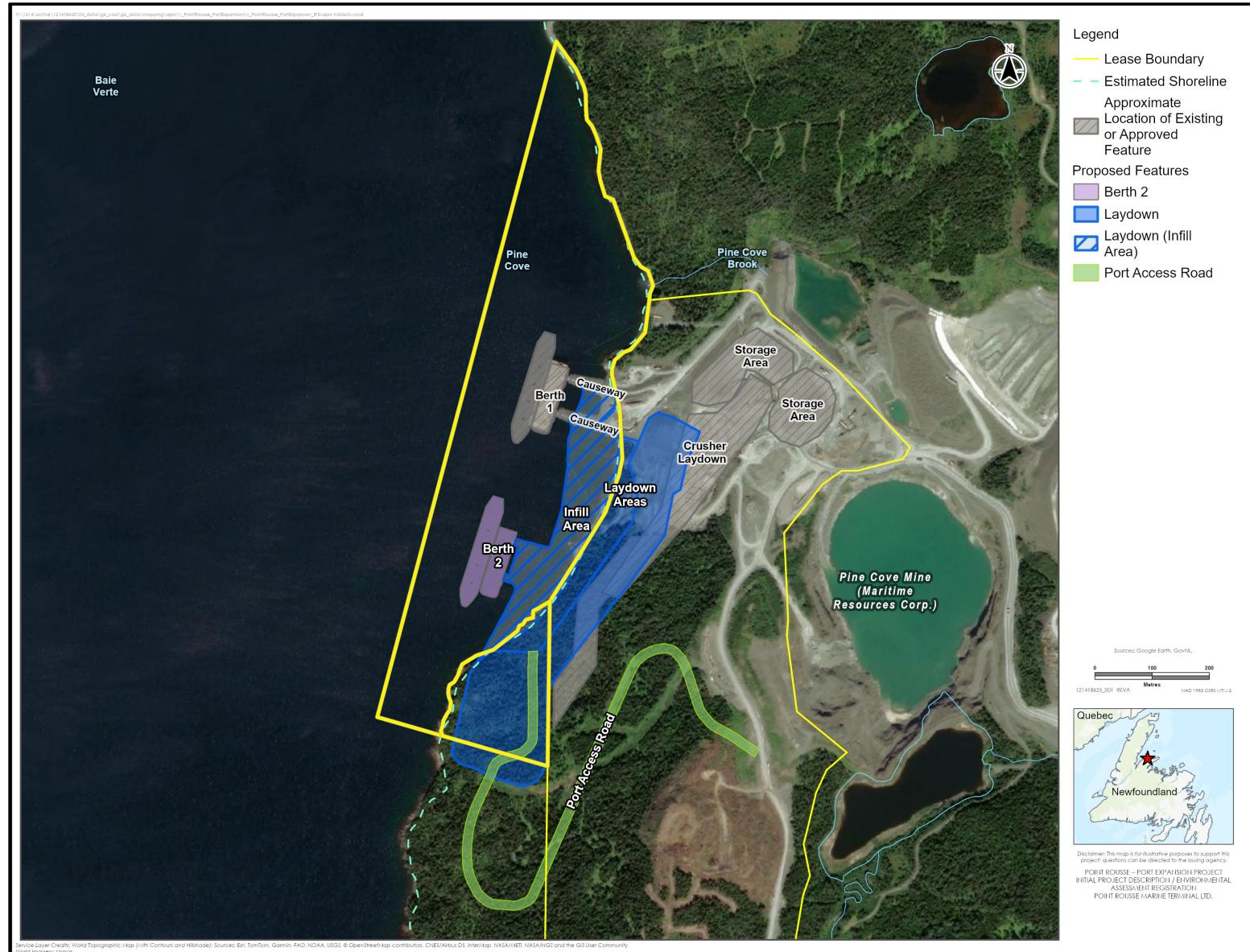


Figure 3.1 Project Components

3.5.1 Port Access Road

A new port access road will be constructed that connects the existing access road to the proposed second berth area (Figure 3.1). 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.

3.5.2 Storage / Laydown Areas and Shoreline Infilling

To support current and future operations, PRMT will construct onshore storage and laydown areas (Figure 3.1) totaling approximately 8.1 hectares (ha). These areas will store aggregate and armourstone, with space reserved for potential third-party use or future development. Stockpiles will be built with earthen bases and sited at least 15 m from the high-water mark. 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. Overland conveyors may be added to move material between stockpiles and vessels.

To further expand usable space, approximately 3.4 ha of shoreline will be infilled using rock excavated during construction of the onland laydown areas. This will connect the existing and proposed berths and fill the area between two existing causeways. Combined, the laydown and infill areas will provide about 11.5 ha of operational space.

The Project includes infrastructure for storing and handling mineral and metal products from regional mining operations, primarily mineral products, in a fully enclosed, weather-tight building with an estimated live storage capacity of 15,000–30,000 tonnes, which will be confirmed during detailed design. 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.

3.5.3 Armourstone Protection

Armourstone material will be placed along the front of the shoreline infilling area (Figure 3.1) to provide shoreline protection and erosion control. The material will be sourced from SAI's quarries.

3.5.4 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 3.1). They will consist of clean rock fill from construction activities (i.e., blasting and excavation) for the on land Project components. The side slopes will be protected with armor to prevent erosion and provide long-term stability.

3.5.5 Dock Structure

The proposed dock structure will be designed to match the existing configuration and accommodate vessels up to 80,000 DWT. It includes two timber cribs (16 m x 16 m) at the ends of rockfill approaches and four concrete mooring bollards (3 m x 3 m) anchored to bedrock. PRMT is also considering alternative designs, such as steel piling with concrete pile caps or a fixed dock with steel piles and a concrete deck to replace the barge. These alternatives would involve pile driving and deep foundation installation, with final design decisions based on Project economics and functionality. The effects of both construction methods were considered in the IPD / Registration.

3.5.6 Barge

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

3.6 CONSTRUCTION ACTIVITIES

Key activities include site preparation (vegetation removal, excavation, blasting, earthworks), building a port access road, causeway, shoreline infill with armourstone, dock infrastructure, and commissioning.

3.6.1 Vegetation Removal

Site preparation will commence with vegetation removal, involving clearing trees and brush, grubbing, and salvaging topsoil from laydown and access road areas. Work will comply with provincial regulations and avoid bird breeding seasons when possible, with environmental monitoring during sensitive periods. Vegetation will be cut close to the ground using approved equipment, and bulldozers used only in low-risk areas. Cleared material will be kept out of watercourses and disposed of above flood levels. Salvaged topsoil and organic material will be stockpiled for future rehabilitation, with erosion control measures in place.

3.6.2 Excavation, Blasting, and Earthworks

Excavation, blasting, and earthworks activities will shape the laydown area and port access road using standard earthmoving methods. Rock will be the primary material excavated, with glacial till removed using conventional equipment and hard rock requiring blasting. Blasting will follow safety regulations and will not occur in the marine environment. It will be coordinated with quarry operations and designed to reduce seismic effects and debris scatter. Overburden will be stockpiled to prevent siltation and used for future rehabilitation. Standard erosion and sediment control measures will be implemented and routinely maintained at stockpile sites. Earthworks will then shape terrain for infrastructure, including leveling, fill placement, and construction of embankments and retaining structures.

3.6.3 Port Access Road

The Project requires construction of a 1.4 km unpaved port access road, approximately 20 m wide, designed to support the largest expected vehicles and match site grading. Cleared organic material will be stockpiled for future rehabilitation. Drainage ditches will be installed beyond road shoulders to manage runoff, with no need for culverts or bridges. Blasting may be necessary during construction.

3.6.4 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. 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. Sediment control measures, such as silt curtains, will be used during in-water work. Vessels supporting marine operations will be inspected for seaworthiness, and activities will pause during unsafe weather conditions.

3.6.5 Dock Infrastructure

The dock will include two rockfill approaches, two timber crib structures, and four mooring bollards. Rockfill will be placed using heavy equipment to reduce water disturbance, and floating silt fences will be used if needed. Timber cribs will be built, launched, and sunk into place with ballast rock on prepared mattresses, then filled and leveled. Mooring bollards will be anchored to exposed bedrock with concrete foundations. No blasting or dredging in the marine environment is required. PRMT is also evaluating alternative designs, including steel piles with concrete caps and fixed structures, which would involve pile driving and deep seabed foundations. These options are discussed further in Section 3.11 of the main document.

3.6.6 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.

3.7 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.

3.7.1 Aggregate, Armourstone, and Mineral Product Storage and Handling

Finished products from nearby quarries, such as aggregate and armourstone, along with mineral and metal products from regional producers, will be transported to storage areas via overland conveyor or haul trucks, with no crushing or other secondary processing planned. Storage areas will be managed flexibly for export needs, with products stockpiled by size for vessel loading. Standard erosion and sediment controls will be applied and monitored to maintain environmental compliance. Storage of mineral products, such as concentrate will be in a storage building located within the proposed laydown area.

3.7.2 Vessel Loading and Vessel Traffic

Ship loading operations at the marine terminal will use conveyors and a mobile radial shiploader for finished products, aiming to complete aggregate loading within three days. Armourstone, due to its size, will be loaded separately using skips and cranes within a one-week period. Shipping is expected to pause during January and February due to ice conditions. While vessel traffic has varied since 2016, future expansion and new clients may lead to a modest increase in shipments beyond the originally approved rate of one vessel per week.

Mineral products will be loaded onto vessels using a covered conveyor system with fixed and mobile sections, connecting the storage building to the berth. Two loaders will feed a hopper inside the building, which links to the conveyor system, with the goal of completing vessel loading within two days. The conveyor leaving the storage building will be covered to mitigate potential dust emissions during operations.

Pilotage is mandatory for approaching vessels, with a pilot station located outside the bay (Figure 3.2). Tugboats assist berthing and departure for vessels without side-thrusters. Marine operations are conducted in accordance with safety, environmental, and emergency protocols outlined in the port manual, which is based on international standards for bulk carrier operations. Support vessels are inspected for seaworthiness, and activities are suspended during adverse weather. Emergency response procedures, including spill containment and reporting, are maintained and will be updated prior to the operation of the new berth.

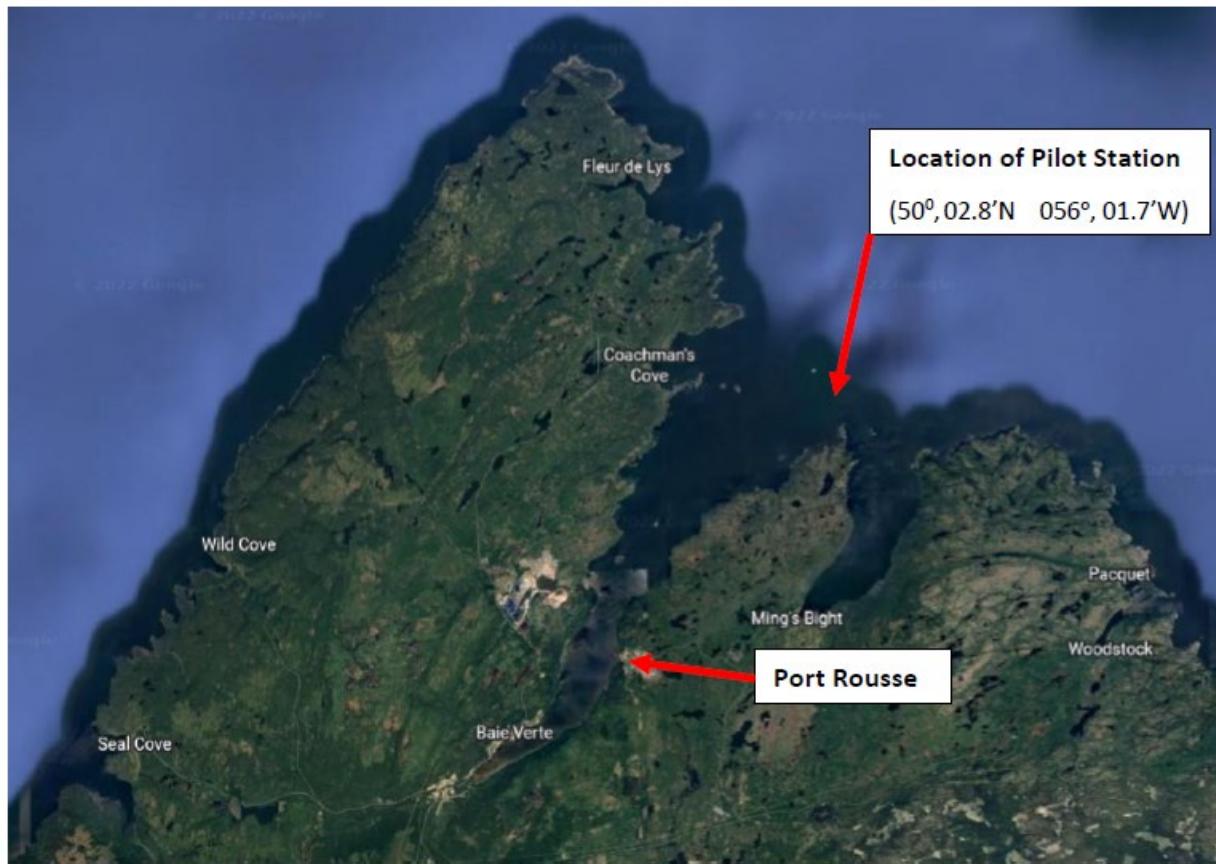


Figure 3.2 Location of Pilot Station and the Project

3.8 REHABILITATION AND CLOSURE

At the end of the Project's operational phase, PRMT will decommission the facilities and implement site rehabilitation to meet environmental and regulatory standards at that time. This may involve removing or managing infrastructure like the causeway and shore infilling, depending on site-specific and regulatory factors. Timber cribs will be demolished, and the barge removed.

3.9 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. The expanded infrastructure will support efficient staging and loading, enabling PRMT to meet growing international demand—especially from the U.S. East Coast and emerging markets—and contribute to economic growth in the Baie Verte region.

3.10 PROJECT SCHEDULE

The Project is scheduled to begin construction in Q2 2026 and finish by Q2 2027, contingent on release from the provincial EA process and assuming no federal impact statement is required. 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. The design phase will run concurrently with EA registration to streamline timelines, and permitting will follow once design stabilizes and EA approval is obtained. After operations conclude, decommissioning and site rehabilitation will occur in compliance with regulatory requirements at that time. The proposed Project schedule and milestones are highlighted in Table 3.1.

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 NLDECCC10 days to prepare a Summary of Issues20 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

3.11 LABOUR FORCE AND OCCUPATIONS

The Project will require typical civil and port infrastructure roles, aligned with the National Occupational Classification system. Construction will last about six months and require approximately 29 full-time equivalent workers. A Gender, Equity, Diversity, and Inclusion Plan will guide inclusive hiring and align with federal and provincial standards. Final job numbers will be confirmed as the Project design is finalized.

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 expansion will generate employment benefits beyond the 29 direct port-related FTEs, supporting regional mining growth and broader economic development. 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. Expanded port capacity will reduce transportation bottlenecks and improve export efficiency, and create indirect and induced jobs in logistics, trades, and services. 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 growth will stabilize the regional workforce, reduce seasonal layoffs, and advance federal objectives under the Critical Minerals Strategy by unlocking shared-use infrastructure and increasing the economic potential of Northern Newfoundland's mineral corridor.

3.12 PROJECT ALTERNATIVES

3.12.1 Alternative Means of Carrying Out the Project

The original berth was built using two rock-filled causeways and timber cribs to support a moored barge that serves as the wharf and loading platform. This simple method allowed construction to be completed in four months. The second berth will use the same approach, but alternative designs, such as steel piles with concrete caps and a fixed deck structure, will be considered during detailed design, based on cost and functionality.

No alternative location was considered for the second berth due to its required proximity to the original berth, and nearby quarries. Building adjacent to the current berth supports operational efficiency, reduces costs, and reduces environmental impacts like increased GHG emissions from trucking. The location also supports logistical needs for vessel separation and bathymetry. While the exact positioning of the berth may be refined during detailed design, the site selection is driven by practicality and regional limitations.

3.12.2 Alternatives to the Project

Expansion alternatives for port facilities are limited due to environmental and economic considerations. Two options were considered: maintaining the status quo, which restricts SAI's growth due to limited capacity, and using an alternate port, which is not feasible due to high trucking costs and increased emissions. The proposed second berth is the only viable option, given its proximity to the aggregate source and existing operations. It will also support long-term operations in Baie Verte and create more jobs.

4 PART C: LOCATION INFORMATION AND CONTACT

4.1 PROPOSED GEOGRAPHIC COORDINATES

The Project is located in Pine Cove, on the east coast of the Baie Verte Peninsula in Notre Dame Bay, within the Baie Verte–White Bay electoral district. It sits adjacent to the existing marine terminal built in 2016, at coordinates 49°57'53"N, 56°08'18"W. The site is about 5 km northeast of the Town of Baie Verte in north-central Newfoundland. Note that the Town of Baie Verte's municipal boundary extends to less than 1 km from the Project. It is accessible via an established road network, including Route 414 (La Scie Highway), Route 418 (Ming's Bight Road), and Route 410 (Dorset Trail) from the Trans-Canada Highway.

4.2 SITE MAPS

The general location of the Project is shown in Figure 1.1. The location of Project components is provided in Figure 3.1.

4.3 LEGAL DESCRIPTION OF PROJECT AREA

The Project is located in Pine Cove, within Baie Verte Harbour on the Baie Verte Peninsula. PRMT has secured most of the required land and water lot tenure from Crown Lands, though a small portion of the port access road and laydown area still requires a provincial application for occupancy rights (Figure 4.1).

4.4 PROJECT PROXIMITY TO RESIDENCES AND NEARBY COMMUNITIES

The Project is located in a remote area of the Baie Verte Peninsula, which has supported industrial activity since the 1960s, including the Pine Cove Mine. The nearest communities are the Town of Baie Verte, about 5 km southwest with a population of 1,311, and Ming's Bight, 7 km east with a population of 298 (Statistics Canada 2023; Figure 4.2). Seasonal cabins are also present nearby, with the closest about 1.5 km south in Apsey Cove and others around Scrape Pond, approximately 2.5 km southeast of the site.

4.5 PROJECT PROXIMITY TO LANDS USED BY INDIGENOUS PEOPLES

The Project area is home to both Indigenous and non-Indigenous residents, including members of the Qalipu and Miawpukek First Nations. A 2020 study by the Qalipu First Nation identified high-use land areas for traditional activities like hunting and gathering, though none were near the Project site (Qalipu 2020). The Miawpukek First Nation are located on Newfoundland's south coast, approximately 350 km away by highway. A Land and Resource Use Survey was conducted in 2025 in support of the FireFly's Green Bay Ming Mine Project (FireFly 2025) which showed low Indigenous representation near the Project, with only 1% identifying as Qalipu and 0.2% as Miawpukek.



Figure 4.1 Lease Boundaries for the Project

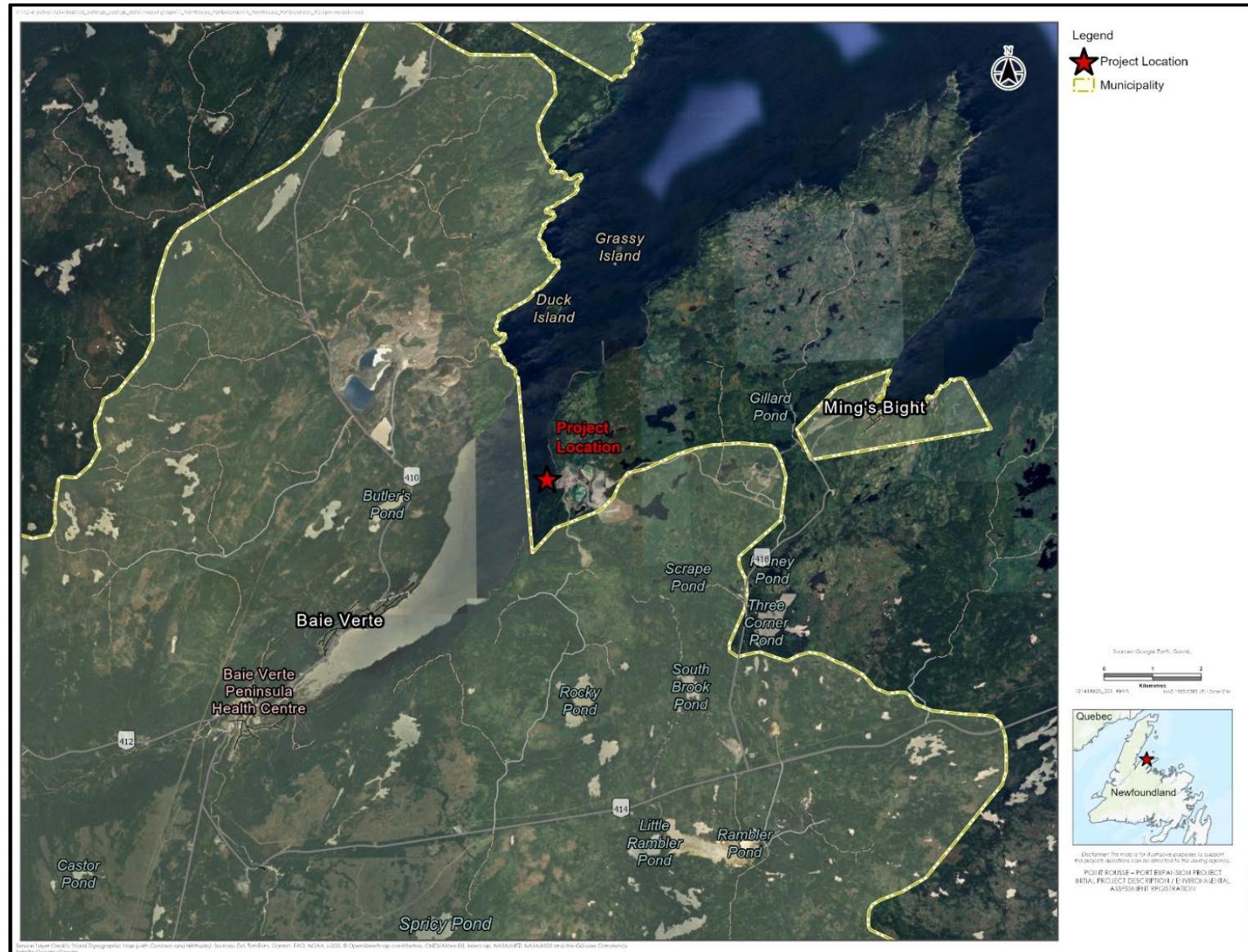


Figure 4.2 Municipal Boundaries of Adjacent Communities

4.6 PROJECT PROXIMITY TO FEDERAL LANDS

There are no federally owned lands or facilities located within the Project footprint. The nearest federal asset is the Small Craft Harbours (SCH) wharf located in Ming's Bight (7 km).

4.7 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. PRMT acknowledges that additional baseline studies may be required for the Project.

4.7.1 Physical Environment

4.7.1.1 Climate

The Project is located at the boundary between the North-central subregion of the Central Newfoundland Forest ecoregion and the North Shore Forest ecoregion (Government of NL 2020). The climate reflects a mixture of both regions and shares a typical seasonal Newfoundland climate. Canadian Climate Normals (1991–2020) data from the nearest weather station (La Scie) is provided in the main document (ECCC 2025a).

4.7.1.2 Air and Noise Quality

Air quality monitoring in Baie Verte (2016 and 2024) shows generally acceptable conditions, with occasional localized exceedances of particulate matter near the Green Bay Ming Mine (FireFly 2025). These fluctuations are temporary and not widespread. Due to nearby mining and quarrying at Pine Cove, similar air quality is expected at the marine terminal. Baseline noise levels are expected to be typical for an industrial area, influenced by vessel loading, quarry operations, and nearby mining activities, with occasional contributions from traffic and recreational vehicles. The region's mixed terrain and wetlands help reduce noise propagation.

4.7.1.3 Geology, Terrain, and Soils

The Project is located in Pine Cove, a rugged, crescent-shaped inlet on the eastern Baie Verte Peninsula. The coastline features steep slopes and cliffs with limited beach area. Elevations near the site range from 60 to 120 meters above sea level, and the terrain is generally rolling with gradients up to 22%. Bedrock outcrops are common, and the surface layer consists of thin, unconsolidated materials like peat, sand, and gravel. Some areas also contain poor sandy till over glacio-fluvial and outwash deposits near major rivers (Anaconda 2016).

4.7.2 Marine Environment

4.7.2.1 Physical Characteristics and Water Quality

Water levels in Baie Verte are influenced by mixed semi-diurnal tides and wind. The tidal range is typically 1.2-1.4 m during the spring tide, and 0.3-0.6 m during the neap tide. Baie Verte receives inputs from nearby watersheds and minor discharges from municipal and marine sources (Anaconda 2016). Historic mining has led to asbestos and metal contamination in downstream waterbodies, while upstream areas remain unaffected (GEMTEC 2019; Stantec 2013, 2016, 2019; FireFly 2025). Discharge from the planned Green Bay Ming Mine, which will enter the South Brook watershed, is predicted to meet background levels before entering Baie Verte to the south of the Project (FireFly 2025).

4.7.2.2 Marine Fish and Fish Habitat

The Baie Verte Peninsula separates Notre Dame Bay from White Bay and supports diverse marine life (CPAWS 2009; PWGSC 2010). Marine plants like eelgrass, kelp, and seaweed are common, along with invertebrates such as jellyfish, lobster, crabs, shrimp, and mussels. Fish species include groundfish (e.g., Atlantic cod, halibut, turbot) and pelagic fish (e.g., capelin, herring, mackerel) (Dillon Consulting 2016). Sharks (e.g., basking, blue, porbeagle), wolffish species, and marine mammals like pilot whales, minke whales, harbour porpoises, and dolphins are also present. Leatherback sea turtles have been documented in the area (Dillon Consulting 2016).

A drop camera survey conducted in May 2016 assessed fish and habitat conditions in the marine portion of the Project area, covering depths from intertidal zones to 20 m (Dillon Consulting 2016). The seabed was mainly composed of sand and gravel, with patches of cobble, boulder, and shell debris. Algal cover was sparse but included filamentous brown algae, kelp species, and encrusting coralline algae. No eelgrass was observed, though it may occur elsewhere in Baie Verte (DFO 2014). Marine fauna observed included sponges, anemones, soft corals, sea stars, brittle stars, green sea urchins, scallops, crabs, cunner, and sculpins—typical of inshore Newfoundland habitats (Dillon Consulting 2016). A review using Fisheries and Oceans Canada's (DFO's) Species at Risk Mapping Tool found no critical habitats or ecologically significant areas near the Project site (DFO 2025).

4.7.2.3 Existing Fisheries and Other Ocean Users

Commercial fisheries near the Project area in Northwest Atlantic Fisheries Organization (NAFO) Division 3K include Atlantic halibut and herring, though data is limited due to privacy screening and mapping constraints—lobster, for example, is underrepresented despite recent local activity (Government of Canada 2025). Recreational fisheries for cod, capelin, mackerel, and squid are managed by DFO, with seasonal restrictions.

No Food, Social, and Ceremonial (FSC) licences are currently issued for Division 3K. However, communal commercial licences have been granted to Qalipu Mi'kmaq First Nation, covering species like mackerel, lobster, scallop, and snow crab (Rowe, pers. comm.).

Marine traffic near the Project site is generally low to moderate, with limited cargo vessel activity and sparse recreational use, though some localized activity may exist but is not well-documented (Government of Canada et al. 2025).

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 (PAANL 2008a, 2008b).

Vegetation near the Project site consists mainly of mature spruce and fir, much of which was harvested in the 1990s. Regrowth includes alder, birch, and willow, and remaining mature timber has been damaged by wind exposure (JWL 1992, 2007).

4.7.3.2 Aquatic Ecosystem

The Project is located within the Pine Cove watershed (approximately 1.6 km²), which has been heavily modified by mining, including pond removals, stream diversions, and habitat compensation. Freshwater studies (1992–2007) identified brook trout as the only fish species, with limited spawning habitat and no sea-run capability due to steep gradients (Gray and Gautreau 2012; JWL 1993, 2007).

4.7.3.3 Wildlife

Wildlife near the Project area includes typical terrestrial mammals, such as moose, black bear, lynx, coyote, red fox, and various small mammals like vole, muskrat, mink, otter, hare, and squirrel (Stantec 2022). Caribou are unlikely to occur based on historical distribution (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, ruby-crowned kinglet American robin, magnolia warbler, and evening grosbeak (FireFly 2025; Stantec 2022). A fulsome description of wildlife and bird species in the region is provided in the main document in Section 4.7.3.

4.7.3.4 Species at Risk

Species at Risk (SAR) referred to in this report are those listed under the federal *Species at Risk Act* (SARA) or the *Newfoundland and Labrador Endangered Species Act* (NL ESA), based on assessments by the Committee on the Status of Endangered Wildlife in Canada. Species of Conservation Concern are not formally listed but may be regionally rare or vulnerable, as ranked by the Atlantic Canada Conservation Data Centre (AC CDC 2025).

An AC CDC search identified one rare fauna record within 5 km of the Project site, a 2023 sighting of a polar bear (*Ursus maritimus*), listed as special concern under SARA and vulnerable under NL ESA. Other species possibly present include banded killifish, ivory gull, red crossbill, and rusty blackbird, while species like Newfoundland marten and boreal felt lichen are considered unlikely (AC CDC 2025). In addition to the AC CDC search, a desktop review was conducted to identify SAR that may be present within or near the Project Area. These results are presented in Table 4.3 of the main document.

There is no designated marine or terrestrial critical habitat identified in the vicinity of the Project area. There are also no Migratory Bird Sanctuaries or Important Bird Areas near the Project.

4.8 REGIONAL HEALTH, SOCIAL AND ECONOMIC CONTEXT

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. Table 4.4 in the main document provides a breakdown of employment by occupation for Economic Zone 11.

4.8.3 Industrial Resources

The Baie Verte region has a long history of mineral development, beginning with the Terra Nova copper-sulfur mine in the 1850s and continuing through major operations like the asbestos mine (1955–1995) and Consolidated Rambler copper-gold mine (1964–1982). Since 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

The Baie Verte Peninsula supports a mix of industrial and community services. In addition to its strong mining legacy, the region hosts small- to medium-sized businesses. Baie Verte serves as a regional hub, offering government services, healthcare, education, and recreational facilities (Town of Baie Verte 2025). The College of the North Atlantic's Baie Verte campus plays a key role in post-secondary education and employment support, with around 70 full-time students and 300 continuing education participants each semester (College of the North Atlantic 2024). Public services include an RCMP detachment, volunteer fire departments, and ambulance coverage by Central Health.

4.8.5 Utilities

The Baie Verte–Green Bay Waste Management Region spans communities from Westport to Brighton, with waste transported from 12 transfer stations to the Norris Arm Waste Management Facility. The facility was expanded in 2016 to serve both the Central and Western regions (NLDMAE 2019; NL Department of Municipal Affairs 2012; Central Regional Service Board 2019).

Baie Verte's drinking water is sourced from Southern Arm Pond and treated through chlorination and filtration, though current water quality ratings are unavailable (NLDECCC 2025). The town lacks a sewage treatment facility and relies on 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 located within Moose Management Area 14, and caribou are not currently hunted on the peninsula. Wildlife hunting and trapping are regulated by the NL Department of Forestry, Agriculture and Lands through annual guidelines and quotas. There are no protected areas within the Project site; the closest are Flatwater Pond Provincial Park (24 km away) and Main River Waterway Provincial Park (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 of the main document.

4.8.8 Historical Resources

A Historic Resources Overview Assessment conducted in 2024 for the Green Bay Ming Mine Project, which overlaps with the PRMT Project footprint, identified 67 registered archaeological sites across the Baie Verte Peninsula, including Pre-Contact and Historic Period sites near Fleur de Lys, Cow Cove, and Green Bay (Stantec 2024). No known historic resource sites have been recorded within the immediate area of the Project. In addition, no historic resources were encountered during site preparation for the existing marine terminal or adjacent quarries.

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

5.1 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 FEDERAL LANDS

There are no federal lands located within the Project footprint.

5.3 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 Section 5.3 of the main document.

5.3.1 Federal Approval

The Project is subject to federal review under the IAA, as it qualifies as a “designated physical activity” under Section 53 of the *Physical Activities Regulations*. IPD must be submitted to IAAC, which will determine whether a full impact assessment is required. If approved, several federal permits may be needed, including authorizations under the *Canadian Navigable Waters Act*, *Fisheries Act*, *Explosives Act*, *Species at Risk Act*, and *Migratory Birds Convention Act, 1994*.

5.3.2 Provincial Approval

Under Section 26 of the NL *Environmental Assessment Regulations*, the Project must be registered as a designated undertaking. In addition to EA release, several provincial permits may be required before construction begins. These include approvals under the *Water Resources Act*, *Environmental Protection Act*, *Forestry Act*, and *Lands Act*.

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.

6 PART E: POTENTIAL EFFECTS OF THE PROJECT

6.1 POTENTIAL CHANGES TO THE ENVIRONMENT

Under the IAA, IAAC requires that IPDs include a list of non-negligible adverse changes the Project may cause to components of the environment under federal jurisdiction. These include

- 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*

Potential effects on these components are detailed in Sections 6.1.1 and 6.1.2 of the main document. Additional environmental components not under federal jurisdiction—such as marine users and other wildlife—are also considered to support the provincial EA process. Preliminary mitigation measures are identified, with further mitigation to be developed as the assessment progresses.

6.1.1 Marine Environment

This section outlines potential ecological and socio-economic effects of the Project on the coastal marine environment, focusing on fish and fish habitat, aquatic species at risk, and marine users. These components are assessed together to provide an integrated understanding of how Project activities may impact ecological functions and resource use. Marine species potentially affected include groundfish, pelagic fish, marine mammals, benthic invertebrates (e.g., mussels, clams, scallops, lobster, crab), and marine flora such as seaweed and kelp.

Socio-economic effects may include disruption to Indigenous, recreational, and commercial fisheries. Recreational fishing targets cod, capelin, mackerel, and squid, while commercial fishing in NAFO Division 3K focuses on halibut and herring, with limited activity near the Project. Indigenous groups hold communal commercial licences, but no active FSC licences are in place. Marine traffic is generally low to moderate.

The Project is expected to interact with these components throughout all phases, with most effects anticipated during construction. Effects and mitigation measures are highlighted below; however, a fulsome discussion is provided in Section 6.1.1 of the main document.

6.1.1.1 Potential Effects and Mitigation during Construction

During construction, the Project may affect both ecological and socio-economic components of the marine environment. Key activities such as shoreline clearing, excavation, infilling, and infrastructure installation could lead to habitat loss, sedimentation, noise impacts, and potential introduction of aquatic invasive species. These effects may disturb fish, invertebrates, and other marine species, and disrupt local fisheries through reduced access, gear damage, and lower catch rates.

To mitigate these impacts, measures will include sediment control (e.g., silt curtains), spill prevention, dust suppression, vessel speed limits, and pre-construction habitat surveys to avoid sensitive areas like eelgrass beds. Quieting techniques for pile driving and biosecurity protocols for equipment and vessels will also be applied. Fishers and marine users will be notified in advance to limit disruptions and support safe navigation.

Construction of the laydown and storage areas near the marine environment will involve land clearing and infilling, which may lead to sedimentation and habitat disturbance. To mitigate these effects, erosion and sediment control measures, such as silt curtains and buffers from natural waterbodies, will be implemented. The placement of armourstone and filter stone may enhance habitat complexity and attract marine life, potentially benefiting benthic species like lobster. However, these benefits are not considered formal offsetting.

PRMT will seek authorization under Section 35(2)(b) of the *Fisheries Act* and develop a Marine Fisheries Offsetting Plan in consultation with DFO. Underwater noise from blasting and pile driving may affect marine species, so mitigation measures like reduced charge sizes and adherence to blasting guidelines will be applied. Construction-related vessel traffic is expected to be temporary and localized, with proactive engagement planned to inform marine users and reduce disruption.

6.1.1.2 Potential Effects and Mitigation during Operation

During operation, the Project may affect ecological and socio-economic components of the marine environment primarily through vessel presence and movement. Potential effects include behavioral changes in marine species due to noise and vibration, increased risk of vessel collisions with marine mammals, and navigation conflicts for other marine users. These impacts are most likely to occur along the shipping lane between the port and the pilotage area.

To mitigate these effects, PRMT will reduce vessel engine noise at berth, limit vessel speeds to 8 knots in coastal waters, and use pilotage services to enhance navigational safety. Vessels will also comply with relevant regulations, including ballast water management, to prevent aquatic invasive species. Shoreline infrastructure will be monitored and maintained to prevent damage from wave or ice action and avoid navigational hazards.

6.1.1.3 Potential Effects and Mitigation during Rehabilitation and Closure

The Project is expected to operate for approximately 30 years, after which rehabilitation and closure activities will include removing the timber cribs and barge from the berth structure, while the causeway and shoreline infilling will remain and be managed long-term. Many of the potential effects and mitigation measures identified for the construction phase—such as underwater noise and sediment resuspension—will also apply during closure. Rehabilitation activities will comply with applicable federal and provincial regulations in effect at the time.

6.1.1.4 Summary of Potential Effects

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 evaluates potential effects of the Project on migratory birds and other wildlife, including SAR, which are grouped together due to shared habitat needs and similar environmental stressors, such as noise, habitat alteration, and human activity. Effects on common species are considered indicative of impacts on more sensitive populations. The *Migratory Birds Convention Act, 1994*, administered by ECCC, protects migratory birds and their nests, while other species are protected under the provincial *Wild Life Act*.

A variety of land, shore, and marine birds may occur near the Project, including SAR such as ivory gull, red crossbill, and rusty blackbird. Terrestrial SAR may also be present. Project activities during all phases are expected to interact with migratory birds and other wildlife, with most effects anticipated during construction. Effects and mitigation measures are highlighted below; however, a fulsome discussion is provided in Section 6.1.2 of the main document.

6.1.2.1 Potential Effects and Mitigation during Construction

During construction, several activities, such as shoreline cleaning and grubbing, excavation and blasting, material placement, and infrastructure development, have the potential to impact migratory birds and other wildlife. These impacts may include direct mortality, destruction of nests or eggs, and loss of critical habitat for SAR. Additionally, noise, vibrations, artificial lighting, and human presence can cause behavioral changes, injury, or sensory disturbances, while collisions with vehicles or vessels may result in further harm.

To mitigate these effects, a range of measures will be implemented. Noise will be reduced through limiting idling, proper equipment use, and regular maintenance. Collision risks will be managed through safety protocols and incident reporting. Vegetation clearing will be scheduled outside of active bat and bird breeding seasons, and work will cease immediately if key habitat features, such as roosts or nests, are discovered, with appropriate authorities notified. Buffers will be established around known sensitive areas, and crews will be trained to respond appropriately to unexpected wildlife encounters.

Waste will be properly disposed of to avoid attracting animals. Lighting will be limited and shielded to reduce disorientation of nocturnal species, especially during migration periods. Timing windows and permitting requirements from ECCC and other regulatory bodies will be followed.

If seabirds or other species become stranded on vessels, operators are expected to follow established handling protocols, including obtaining the necessary permits for release. Terrestrial mammals may be affected by habitat loss, increased noise, and human activity, though the long-standing industrial presence in the area suggests some level of wildlife adaptation. Changes in species composition, such as increased presence of foxes or coyotes, may occur. To reduce these effects, good housekeeping practices will be enforced throughout the Project.

6.1.2.2 Potential Effects and Mitigation during Operation

During the operational phase of the Project, activities such as marine vessel traffic, on-site vehicle movement, equipment operation, and the presence of personnel have the potential to affect migratory birds and other wildlife. These impacts may include direct mortality, destruction of nests or eggs, and disturbance to critical habitat for SAR. Noise, vibrations, artificial lighting, and human activity can also lead to behavioral changes, injury, or altered habitat use, while collisions with vehicles or vessels may result in further harm.

To mitigate these effects, several measures will be implemented. Noise will be reduced through limiting idling, proper equipment use, and regular maintenance. Collision risks will be managed through safety protocols and incident reporting. If a bird nest is encountered, work will stop immediately, and the area will remain undisturbed until the nest is no longer occupied or the work plan is adjusted to avoid it. Buffers will be established around known nests, and crews will be informed about the possibility of undiscovered nests and how to respond appropriately.

Waste will be properly disposed of to prevent attracting predators. Lighting will be limited and shielded to reduce disorientation of nocturnal species, especially during migration periods. Timing windows and permitting requirements from ECCC and other regulatory bodies will be followed.

Although no further habitat loss is expected during operation, sensory disturbances and collision risks will persist at levels similar to those during construction. Wildlife interactions are anticipated to resemble those already occurring at the existing terminal.

As with construction, stranded seabirds on vessels must be handled according to established protocols, and appropriate permits must be obtained for their release. Terrestrial mammals may be affected by noise and human disturbance, and nocturnal species may be attracted to or disoriented by lighting. Changes in local mammal populations, such as increased presence of foxes or coyotes, may occur due to their adaptability to human environments. To reduce these effects, good housekeeping practices will be enforced throughout the operational phase.

6.1.2.3 Potential Effects and Mitigation during Rehabilitation and Closure

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 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.

6.1.2.4 Summary of Potential Effects

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.

6.1.3 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.

6.1.4 Impact on the Environment on Indigenous Peoples

The Project may result in potential non-negligible adverse effects on Indigenous peoples' ability to access traditional lands and practice hunting, fishing, gathering, and cultural activities, due to impacts on the marine environment and wildlife. However, there are no documented traditional use or known cultural sites within the Project area. 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. 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.

No designated Indigenous lands or known FSC fishing activities exist in the area. However, if such activities do exist, the mitigation measures outlined in Section 6.1.1 will help reduce potential effects on Indigenous fishers. PRMT is committed to ongoing engagement with Indigenous groups and will maintain transparency continued dialogue during Project development.

6.1.5 Impact on the Health, Social or Economic Wellbeing of Indigenous Peoples

Potential non-negligible adverse effects on Indigenous health, social, and economic well-being could occur if natural resources used for traditional or commercial purposes are impacted, particularly communal commercial fishing, which is culturally and economically important. However, Indigenous presence near the site is considered low, and mitigation measures will reduce potential effects if such activities exist. The expansion builds on an existing terminal with no reported impacts and is expected to provide positive benefits through employment and infrastructure improvements.

As indicated 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.

6.1.6 Greenhouse Gas Emissions Associated with the Project

The Project will generate GHG emissions throughout its construction and operation primarily from diesel combustion and electricity use. During construction, approximately 411,520 litres of diesel will be used by heavy equipment for activities such as site preparation, earthworks, and road building, with minor emissions from blasting. In operation, diesel will continue to be used for loading and transporting aggregate, armourstone, and mineral products, with marine vessels burning an estimated 91,873 litres of fuel annually while docked. Electricity from the NL grid will also contribute to emissions, based on projected throughput.

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 2025b). 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
CO ₂ e = Carbon Dioxide Equivalent	

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. PRMT and SAI have already implemented a number of operational upgrades and energy transition measures that have reduced its GHG emissions intensity including switching to grid power, modernizing equipment (cutting emissions by 32%), and optimizing conveyor systems. These upgrades reflect a commitment to continuous improvement and Environmental Social Governance principles, with ongoing tracking and future reductions planned.

6.1.7 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 are summarized below.

6.1.7.1 Atmospheric Emissions

The Project will produce GHGs, particulate matter, and criteria air contaminants from Project activities and equipment. Mitigation measures include using low-emission equipment (Tier 4), dust suppression, reducing idling, optimizing haul routes, and using hydroelectric power instead of diesel-generated electricity.

6.1.7.2 Solid Waste

Minor amounts of solid waste will be generated, including non-hazardous materials (wood, metal, packaging), waste rock, and general refuse. Waste will be sorted, recycled where possible, and disposed of per provincial regulations. Hazardous waste (e.g., lubricants, filters) will be handled by licensed contractors.

6.1.7.3 Wastewater and Effluents

Operational wastewater will mainly include stormwater runoff from stockpiles and process water from dust suppression and cleaning. Discharges will be managed through drainage and sediment control systems in compliance with provincial regulations. The mineral product storage building will have equipment washdown facilities, with wash water collected in a holding tank and transported to a licensed facility for disposal.

6.1.7.4 Marine Emissions

Vessels at berth may emit GHGs and air contaminants from auxiliary engines. Emissions will be reduced through efficient scheduling, reducing berth times, and potential future use of land-based power.

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