ALLARD DISTRIBUTING LIMITED
BUTLERS PIT QUARRY

Environmental Assessment
Registration Document

Submitted by:
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1.0 NAME OF UNDERTAKING

Butlers Pit Area Quarry Permit Application

- Quarry Permit Identification
  - File 711:12958 covering 34.7 ha
- Environmental Assessment Registration Identification
  - File Reference No. 200.20.3156

2.0 PROPONENT

2.1 Name of Corporate Body

Allard Distributing Ltd.

2.2 Address

1501 Luce Road
Labrador City, NL
A2V 2K7

2.3 President

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3.0 THE UNDERTAKING

3.1 Nature of the Undertaking

The proposed project referred to as the Butlers Pit / Cowboy Creek Quarry is a 34.7 ha quarry permit application (File 711:12958) submitted in April 2022 and was defined by the Environmental Assessment Regulations, 2003 Section 33(3) as requiring environmental review. The quarry is ~13 km east of Labrador City (**Figure 1**), accessed by a gravel road that extends ~1.2 km south from the Trans-Labrador Highway (Route 500; TLH) and is shared by other quarry operators in the area (**Figure 2**). Allard Distributing Ltd. (Allard) operate two existing quarry permits (711:1395-7.72 ha & 711:8397-1.75 ha) at Butler Pit that were released from Environmental Assessment (EA) review in 2011 (Reg# 1557) and 2017 (Reg# 1923). These quarry permits will eventually be combined into a larger project covering ~44.17 ha and developed under a quarry lease with Development, Rehabilitation and Closure (DRC) plans submitted and approved by the Department of Energy and Mines. Allard operate two other quarry permits (711:10627-0.5 ha & 711:6823 0.5 ha) near Huguette Lake and a quarry lease (711:12216-6.5 ha) was released from EA in 2020 (Reg# 2099).

The project will allow Allard to expand their existing operations by extracting sand and gravel sold mainly to the private and municipal construction industry in western Labrador. The Butler Pit area has been quarried since the 1990's where abundant sand and gravel is contained within the glaciofluvial esker identified in the region (**Figure 2**). The proposed 34.7 ha quarry project will provide Allard with a long-term supply of pit run sand and gravel and various crushed rock aggregate (class A, class B, etc.). The heavy equipment used for processing, i.e. crushing and/or screening, will be subcontracted to other operators as required. Clearing will be completed in stages, and the stripped grubbing and topsoil will be separated and preserved for future rehabilitation of the site. Only areas proposed for near-term development will be stripped to ensure quarry operations are sustainable and have minimal impact on the environment. A water management plan for the combined ~44.17 ha project area will conform to the regulations for environmental protection set by the Water Resources Management Division of the Department of Environment and Climate Change.

3.2 Purpose/Rationale/Requirement for the Undertaking

Allard Distributing Ltd. will utilize the 34.7 ha quarry permit to provide an estimated ~20,000 tonnes annually of processed and unprocessed raw materials to the municipal construction and mining industry in western Labrador. This rate will fluctuate annually to meet demand if Allard bids on larger future contracts. Peak operations are expected during summer months. The site has been previously established, and quarrying

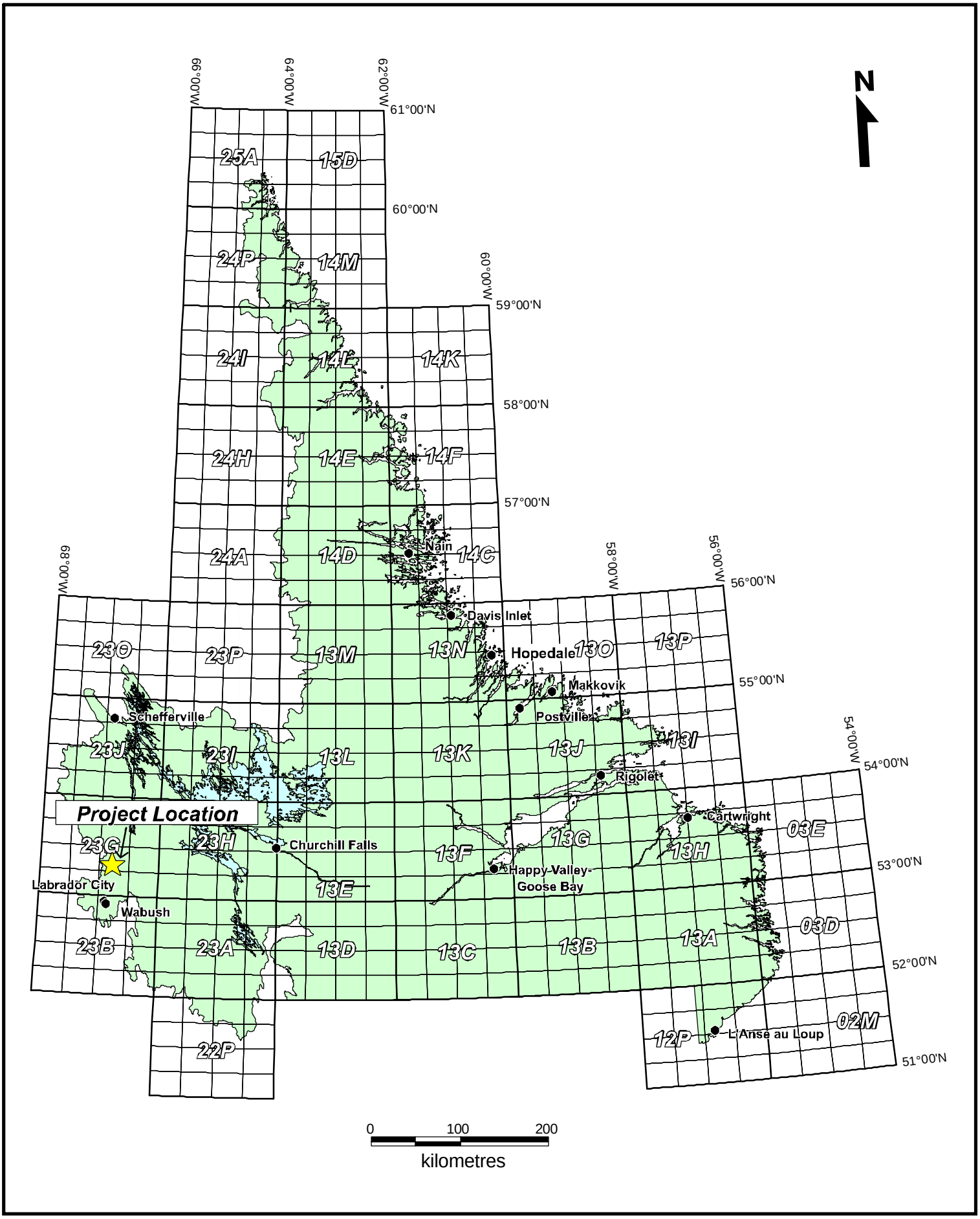

Figure 1: Project Location Map (N.T.S. 23B/15)

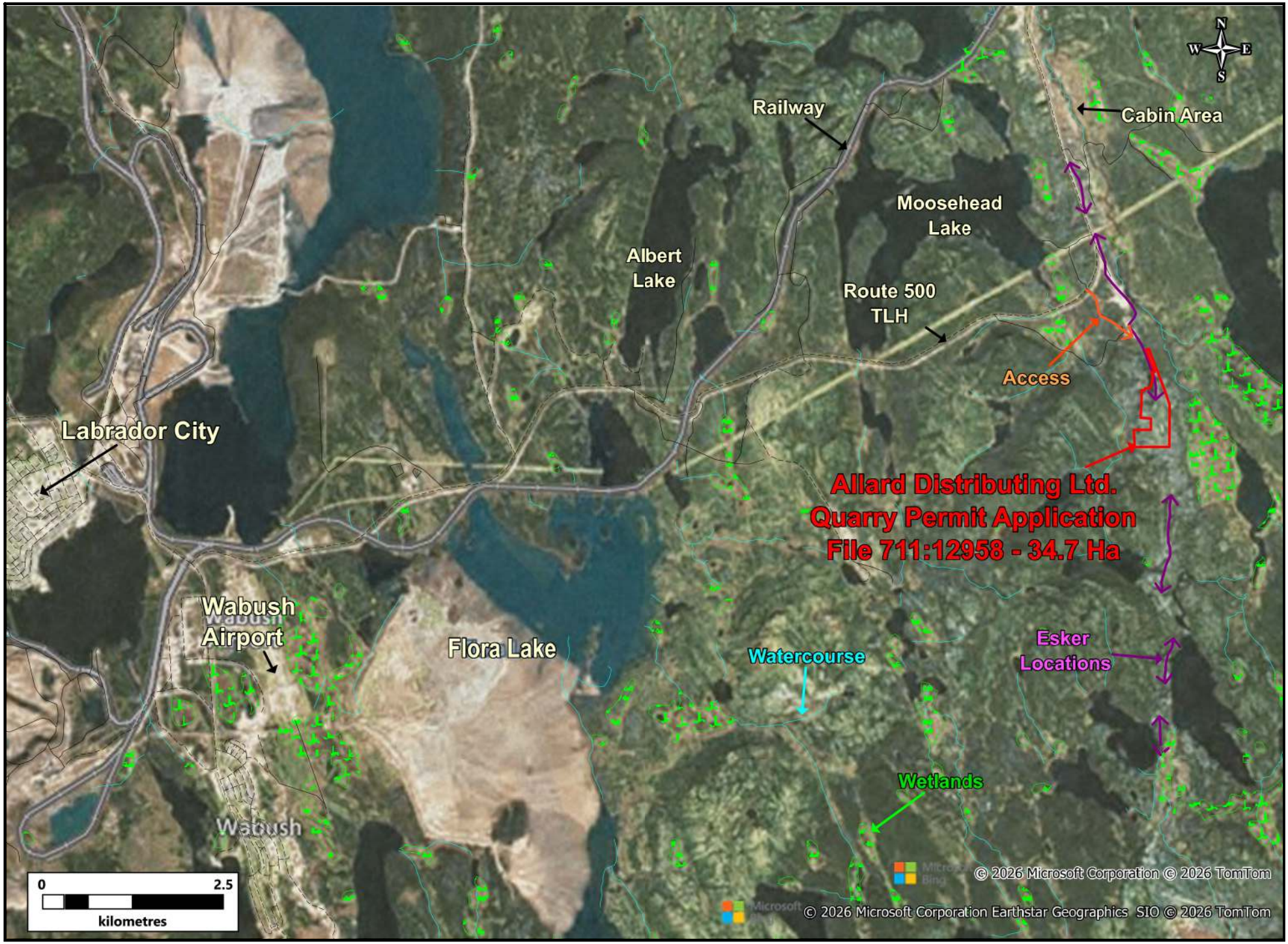

Figure 2: Quarry Permit Location Map

operations will utilize the typical quarry related heavy equipment and contractors to complete operations without the need for drilling and blasting.

The location of quarry operations are the most reasonable from a safety, environmental and regulatory point of view because the area is an established quarry area. Quarry operations will conform with existing sand and gravel quarries in the area while ensuring minimal impact to the surrounding environment. Allard intends to follow the quarry legislation prescribed by the Department of Energy and Mines including full rehabilitation of the site upon closure.

The permit boundaries have been established so that waterbodies and watercourses are buffered from the project boundary (**Figure 3**). Cowboy Creek is located ~100 m outside the western boundary and a second watercourse is ~200 m beyond the eastern boundary. An unnamed small pond adjacent to the northern boundary has established a 50 m buffer zone to the quarry boundary. An internal 5 m buffer zone to the permit boundary will be left undeveloped (**Figure 3**). Drainage channels, rock check dams, silt screen fencing and a settling pond will be designed as required to control and filter any discharged surface water from the site.

Construction of the project in the proposed development area will require minimal tree removal due to a historic forest fire and the stripping of overburden from a ~3 ha area which will progress incrementally over several decades. Salvaged topsoil and grubbing will be stockpiled inside the permit area (***Figure 3***). Development will progress south from the existing quarry floor area along 5 m high development faces with adequate bench design spacing as required by Occupational Health and Safety Regulations. The glaciofluvial esker is mapped over ~4 km to the south and ~3 km to the north of the quarry and is situated along an open river valley that descends gradually northward (**Figure 2**).

Should the Office of Indigenous Relations and Reconciliation and/or the Department of Labrador Affairs determine that consultation is required with Indigenous people and communities after reviewing this registration document, Allard will carry out this process. It was noted in the initial referral response to the quarry permit application that this maybe required. In a previous EA registration (Reg #1923) release, for an adjacent quarry held by Allard, consultation was not required.

4.0 DESCRIPTION OF THE UNDERTAKING

4.1 Geographic Location

The project is located approximately 14.0 km east of Labrador City – Wabush, on NTS Map Sheet 23B/15 and ~1.2 km southeast of the TLH (**Figures 1 & 2**). The provincial

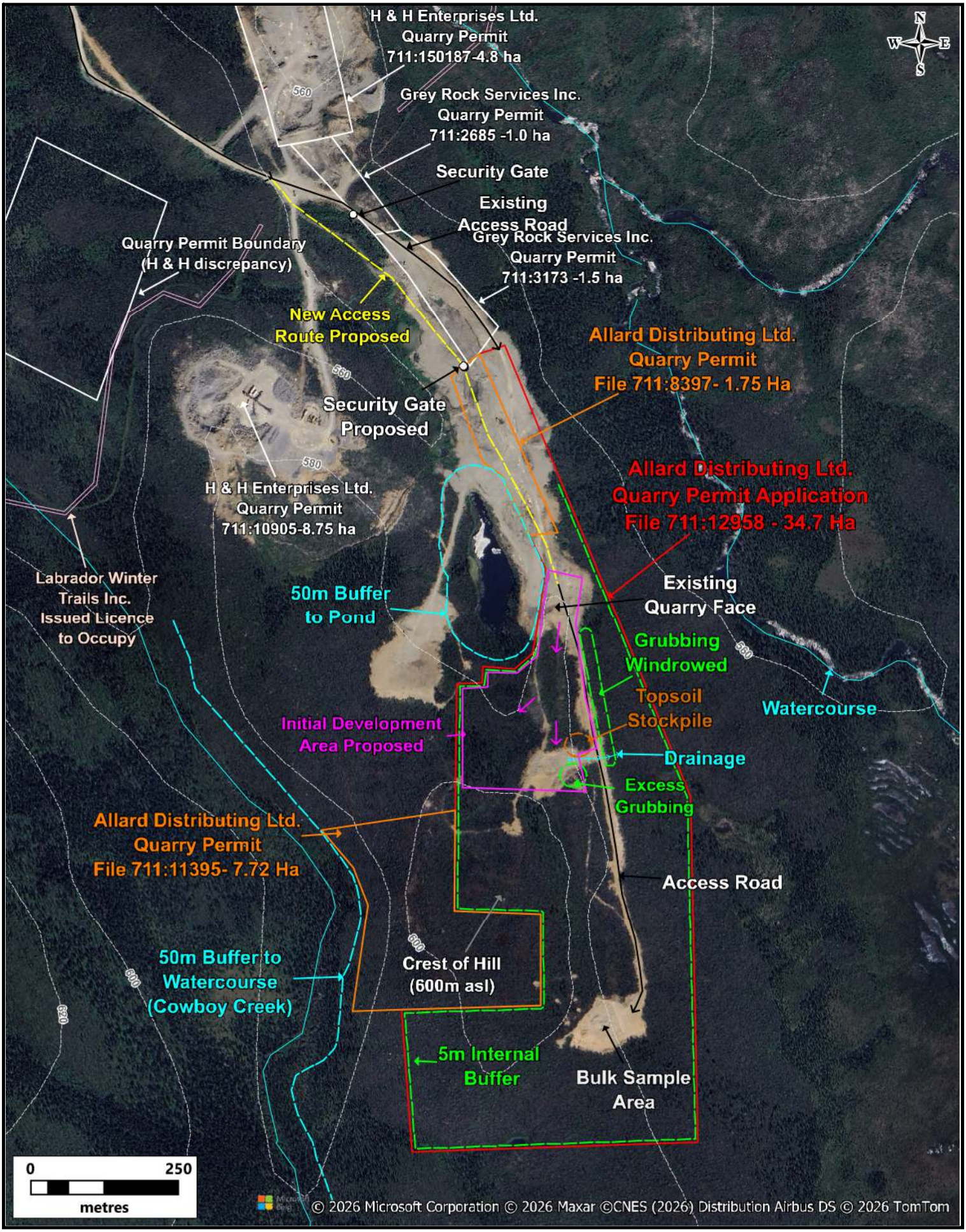

Figure 3: Detailed Quarry Application Area Map

border with Quebec is ~3.3 km southeast of the quarry and this area is undeveloped and forested. The quarry is outside of an adjacent Crown Lands Reserve and within a broader domestic tree harvest area known as Blueberry Hill. Sensitive human receptors to the project are shown in **Figure 4** including Crown Land Grants and Issued Licenses around Moosehead Lake and Albert Lake, located ~2 to 6 km north to northwest. The Labrador Winter Trails Inc. snowmobile trail is ~ 440 m north of the project and crosses through Grey Rocks quarry area near the current access gate (**Figure 3**). An access gate, berms and signs will be placed along the northern boundary of the quarry permit and will restrict access and warn the public of the operations. Surrounding the project are young to mature, sparsely spaced forests and burn over areas with new regrowth (**Figure 3**).

The quarry project application (File 711:12958- 34.7 ha) will be combined with ~9.47 ha of existing approved quarry permits (File #711:8397-1.75 ha & 711:11395-7.72 ha) and developed under a quarry lease approval. The northern permit (File 711:8397-1.75 ha) has mostly been quarried while the southern quarry permit (file 711:11395-7.72 ha) is undeveloped. Additional quarry operations north of the project include H & H Enterprises Ltd. (711:1537-4.8 ha & 711:10905-8.75 ha) and Grey Rock Services (711:3173-1.5 ha, 711:2685-1 ha & 711:5796-1.56 ha; **Figure 3**). Land use in the area includes winter snowmobiling, forestry and other recreational activities, that will not be hindered by the proposed development. Potential resource conflicts within the proposed quarry construction and operations are discussed in **Section 4.5**

4.2 Physical Features

4.2.1 Project Site Description

The 34.7 ha quarry permit application boundary (File #711:12958) is mostly undeveloped while existing disturbed areas from quarry operations cover ~ 3 ha, including an access trail, test pit areas and development face in the north (***Figure 3***). A portion of the access road crosses Grey Rock's quarry permit (711:3173-1.5 ha) and will be relocated ~70 m to the southwest to avoid conflict with the permit. This adjacent Grey Rock quarry permit boundary will be clearly defined as a berm composed of armour stone or other aggregate material to restrict access. The 50 m pond buffer zone will also be clearly marked with a berm. A security gate currently located outside the project will remain and a new gate will be installed at the northern project boundary. A 5 m internal buffer zone will serve as an area to place a berm of windrowed grubbing along the permit boundary, except in areas where it has already been stripped. Initial quarry operations will progress southward into the proposed development area once cleared and stripped (**Figure 3**). Adequate buffer areas are established outside the project boundary with natural forest protecting sensitive habitats.

The elevation inside the project ranges from ~570 m above sea level (asl) in the north and east to ~600 m asl in the west atop a hill crest (**Figure 3**). The quarry access trail/ road stretches south inside the permit area and was used for test pitting (**Figure 3**) to assess the bulk sand and gravel resource. The material contains mainly sand and gravel with a fluctuating content of silt, cobble and boulder within the esker stratigraphy. All extracted materials will be utilized where possible and no washing of aggregate is expected on site at this time. The depth to bedrock is not known inside the permit and considered to be greater than 5 m at a minimum. The adjacent quarry area operated by H & H Enterprises contains exposed bedrock and is located ~800 m northwest (**Figure 3**).

4.2.2 Existing Biophysical Environment

The quarry project is located within the *Mid Subarctic Forest of the* (Michikamau) *Labrador Ecoregion.* This ecoregion can be divided into two sections. The largest section lies east and south of the Smallwood Reservoir and extends across the Labrador-Quebec boundary. The other section stretches across central Labrador, from the Smallwood Reservoir in the west to Postville in the east. The project area can be classified as a mid-subarctic forest.

The climate in this region is characterized as continental and subarctic with cool, short summers, and cold severe winters. The mean winter temperature is approximately -15°C, and the mean summer temperature is around 9°C. The overall mean annual temperature is about -3.5°C and the mean annual precipitation varies from 900 mm to 1000 mm. The growing season is between 100 and 120 days long.

The open coniferous forests are bordered by tundra and alpine tundra vegetation to the north and by typical coniferous boreal forests to the south. Woodland areas contain black/white spruce with an understory of feathermoss and lichen in open stands while extensive ribbed fen & string bog complexes exist between woodland areas. Bogs are usually bordered with dominant black spruce forest stands; aspen and jack pine also occur in this ecoregion. The area within the quarry permit boundaries is typically covered in caribou lichen, broadly spaced black spruce and burn over areas.

The topography in the ecoregion is flat to gently rolling, and lakes are abundant. Drumlins and eskers are common types of landforms. Elevation ranges from 330 m to over 500 m, with isolated rugged hills rising approximately 150 m above the general surface elevation. Permafrost occurs in isolated areas, primarily in wetlands. Caribou, moose, small mammals, waterfowl, and other birds can be found in this ecoregion along with other species. Land use activities include hunting, trapping, fishing, and outdoor recreation.

Rocks of the Churchill Province underlie this ecoregion in the north and those of the Grenville Province in the South. The older rocks in the Churchill Province are gneisses.

The gneisses are overlain in the western part of the ecoregion by a belt of sedimentary and volcanic rocks known as the Labrador Trough. These rocks have been dated at about 1.8 billion years and are host to the iron ore mines of western Labrador.

4.2.3 Site Visibility

The Butlers Pit/ Cowboy Creek quarry area has existed since the early 1990's and quarry sporadic disturbances cover a 50 to 100 m wide by ~1.5 km long area located south of the TLH at an elevation between ~560 to 570 m asl. The gravel access road climbs gradually in elevation by ~20 m from the TLH to the site in the southeast. A mapped sand and gravel esker feature trends north-south across a subtle open-faced valley. Elevations inside the quarry are between ~570 to 600 m asl. Views of the quarry from the west are blocked by a rise in topography to ~640 m asl outside the quarry (**Figure 4**). Views of the proposed development area are mostly open to the north by the slight rise to ~595 m asl inside the development area. The southeast quarry area is hidden from view from the TLH behind the hill crest peaking at ~600 m asl inside the quarry permit that stretches ~530 m south (***Figure 3***). The adjacent H & H Enterprises quarry located ~500 m northwest is along the same elevation, is closer to the TLH and helps conceal the development area from northwesterly views (**Figure 4, 5 & 6**). Progressive development of the quarry will lower the quarry floor. Portions of the quarry that are exhausted of resource and not useable for quarry operations may be rehabilitated, thus further concealing the quarry and/or blending the development with its surroundings. Progressive and closure rehabilitation will be considered in updated Development, Reclamation and Closure (DRC) plans submitted to the Department of Energy and Mines and are part of any approved quarry lease plan.

4.3 Quarry Construction, Operation and Maintenance

Allard will develop and implement appropriate construction and operating methods to preserve the surrounding natural environment and habitats. The resource of sand and gravel inside the 34.7 ha quarry permit will be gradually developed at a rate equal to the annual demand for the sand, gravel and produced aggregate for the municipal/commercial industry in the region. This is estimated by the proponent to be ~20,000 tonnes per year. A quarry operator will be subcontracted as needed to complete some of the processing activities which will be primarily crushing activities. Unprocessed pit-run sand and gravel extracted from the quarry will account for half of the demand, while processed crushed rock aggregate will account for the other half based on current demand. The existing quarry areas will be developed and gradually extend southward once areas are stripped and cleared of grubbing/overburden. The remaining undeveloped areas will be left for future development. A detailed set of DRC plans or Quarry Lease Plan (QLP) for the combined quarry permit areas will be submitted to and approved by

Figure 4: Receptors Location Map

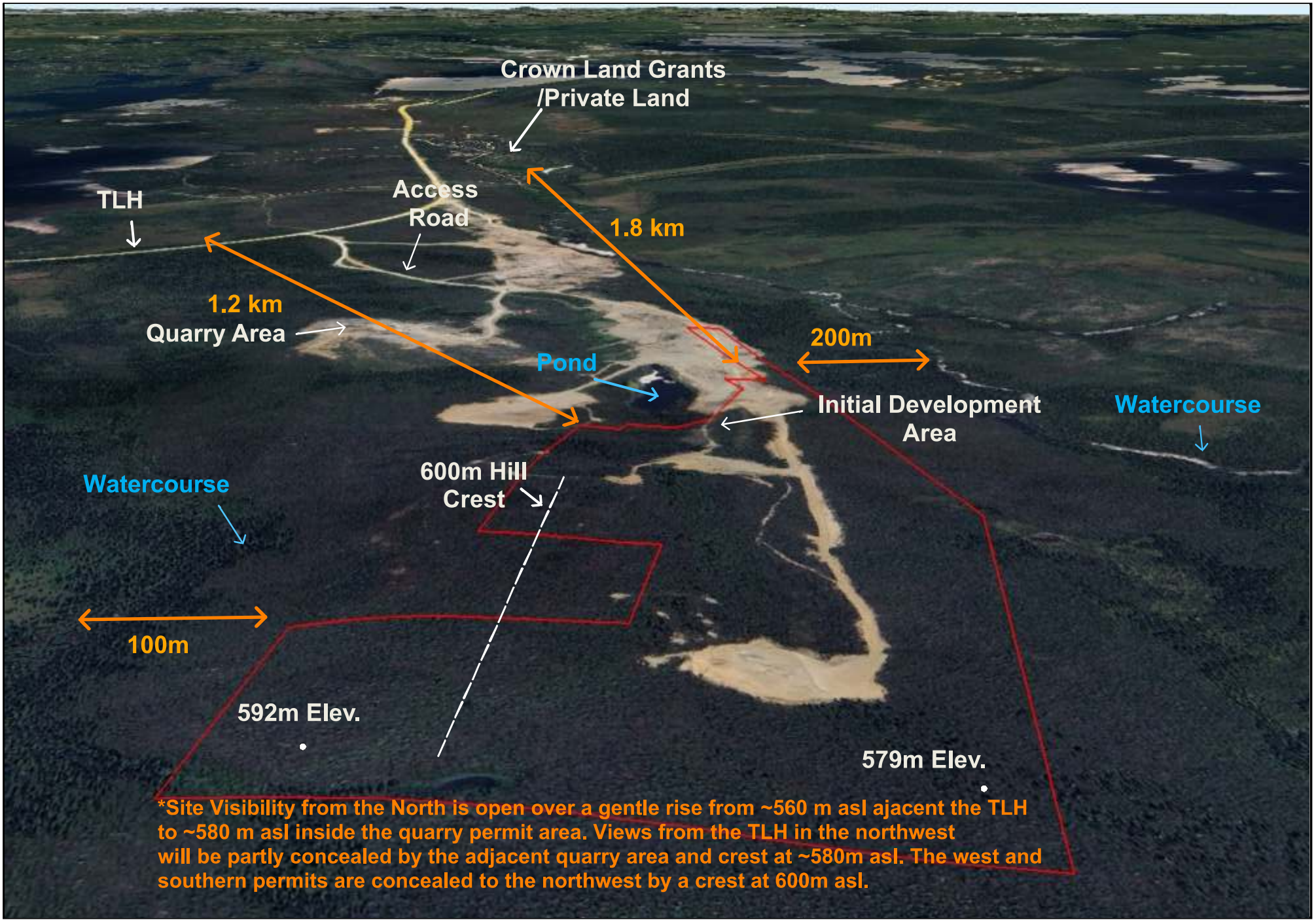

Figure 5: Example of Site Visibility from the South (Looking North) - Aerial View

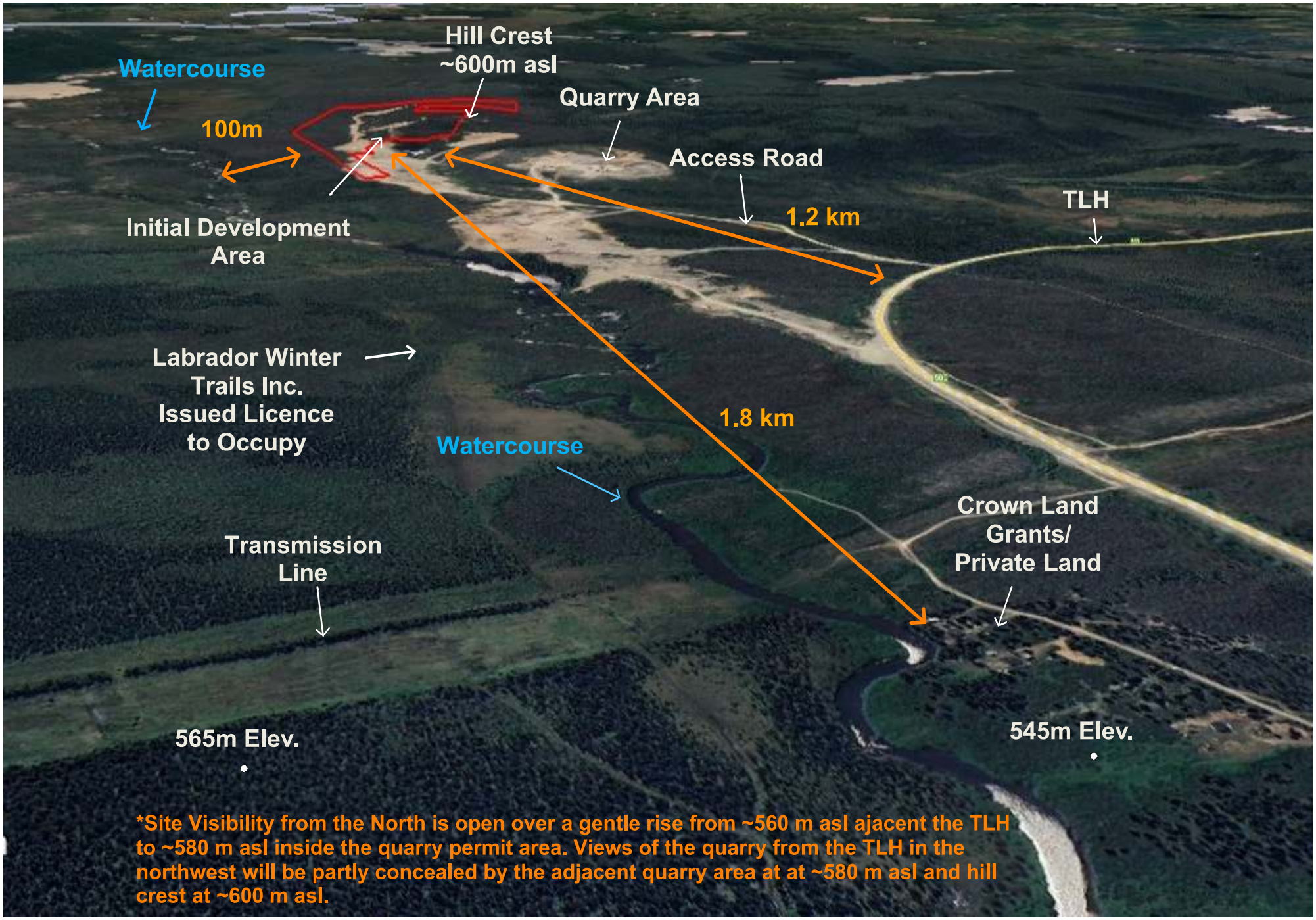

Figure 6: Example of Site Visibility from the North (Looking South) - Aerial View

Provincial Government Department of Energy and Mines, after the anticipated release from Environmental Assessment (EA) review.

4.3.1 Site Access

Access to the site is gained via a ~1.5 km long gravel road leading south from the Trans Labrador Highway (TLH – Highway 500) and is located ~14 km east of Labrador City (**Figure 2**). The access road, security gate, and security berms constructed will define the quarry boundary and control access to the quarry area (**Figure 3**). The current access road passes through Grey Rock quarry permits (711:3173-1.5 ha & 711:2685- 1.0 ha) and will be rerouted ~70 m south through a partly established area (**Figure 3)**. Quarry access will be restricted by a lockable security gate at the northern quarry boundary

(**Figure 3)**. The access road will be separated from the adjacent 50 m pond buffer and Grey Rock permit by a berm or armour stone. Internal haul roads accessing the proposed development area will progress in the direction of the development (**Figure 3**). Maintenance of the access road will be completed by using an excavator and/or grader as required to smooth ruts and maintain drainage ditches.

4.3.2 Site Clearing

Site clearing will be done gradually and in conjunction with the advancement of quarry development in the proposed area (**Figure 3**). During site clearing any merchantable timber will be cleared either by handheld chainsaws or mechanical harvester equipment and will be garnered under a commercial cutting permit issued by the Department of Fisheries, Forestry and Agriculture. Surficial soils, subsoils and grubbing when combined are estimated to be ~0.5 m thick with topsoil being ~0.2 m thick locally. The overburden material containing organics will be stripped, stockpiled and windrowed within or adjacent to the development footprint (**Figure 3**). The organics will be preserved for use as future reclamation material to cover the developed area upon closure of the quarry promoting efficient regrowth in disturbed areas. A 5 m internal buffer zone to the permit boundary will be left undeveloped except in the north where it borders existing quarry developments (**Figure 3**). Existing disturbed areas outside of the permit boundary by quarrying will eventually be rehabilitated after the DRC plans are submitted and approved by government.

4.3.3 Construction, Development and Operation

With the anticipated release of the project from EA review, and once the quarry permit is issued, quarry operation will resume and stripping will begin incrementally inside the proposed development area (**Figure 3**). Quarry faces will be up to 5 m in height with bench design spacing adequate for sloping and catch berm placement. The groundwater

level will be below the excavating depth/quarry floor and surface water drainage in constructed channels will daylight with topography in the east (**Figure 3**). Processed and unprocessed sand and gravel will be stockpiled on site and transported to construction sites near Labrador City. Boulders up to 2 feet/ 0.6 m in diameter may be crushed/screened and oversized rock may be used as armour stone. Currently the washing of aggregates is not expected to occur on site but maybe a future quarry activity depending on possible future contract requirements. Operations will be performed using heavy equipment owned by Allard including excavators, front end loaders and dump trucks while mobile crushing, screening and conveyors may be subcontracted as required. The proposed quarry permit will allow Allard to secure a long-term resource of sand and gravel to meet current and future consumer demands while following the regulations for the development, rehabilitation and closure of the quarry site.

Typical quarrying activities will take place approximately between May and October of each year but will ultimately be dictated by the timing of seasonal spring melt and the onset of winter conditions. All extraction activities will adhere to the Government of Newfoundland and Labrador's Occupational Health and Safety Regulations under the Occupational Health and Safety Act. The future 44.7 ha combined quarry project area contains approved quarry development areas, access roads and a long-term resource that will create a 'closed loop' operation inside the boundary. This reduces the hauling distances on public roads as all operational activities can occur internally, reducing the carbon footprint, and maximizing cost efficiency.

4.4 Potential Sources of Pollution During Construction and Operation

The construction and operation of the proposed quarry will utilize various heavy equipment that presents a source of noise disturbance, exhaust emissions, petroleum/ hydrocarbons, dust, domestic waste, and general refuse to the surrounding environment. It is the responsibility of Allard to maintain equipment in good operating condition and follow Occupational Health and Safety standard protocols for quarry operations. Allard will ensure that the quarry site has an emergency response plan, and that necessary emergency response equipment is available to address hazards related to fire and hazardous spills thus protecting the workers and the environment. Consistent monitoring of the site and operating equipment will ensure that potential sources of pollution are identified, and appropriate steps are taken to mitigate hazards to the surrounding environment.

4.4.1 Air

Air pollution will be generated in the form of exhaust fumes from operating equipment and dust from airborne clay particles in the quarry will be minimized. Exhaust fumes will be

reduced by ensuring that all mechanical equipment using combustion engines contain functioning emission-control devices fitted to the exhaust system. These devices reduce harmful pollutants contained in the exhaust. When heavy equipment is not in operation it will be shutdown, avoiding unnecessary idling, to maximize fuel efficiency and minimize unnecessary exhaust fumes. Dust created from the quarry operations will be controlled by minimizing the development footprint and stripping overburden from only the required production areas in sequence and not all at once. The dust generated by heavy equipment traveling along the quarry floor or access roads will be mitigated during very dry periods by using mobile watering trucks to suppress silt particles preventing them from becoming airborne. All activities within the quarry will be conducted in a manner that respects the province's *Air Pollution Control Regulations (2004).*

4.4.2 Noise and Vibration

The machinery, inside the quarry site, will generate some amount of noise during operations and processing. The use of blasting techniques is not required on site. The expected sound levels will not exceed those generated by previous and ongoing quarry operations in the area that include crushing/screening. All mechanical equipment used in the operations will be maintained to ensure that the decibel levels produced do not exceed the manufacturing standard. The quarry site will be a controlled environment whereby operations typically occur during daytime work hours.

4.4.3 Domestic Waste and Sewage

The permit holder is responsible for waste material generated on site. Domestic garbage and food waste generated by employees will be placed in suitable refuse containers and disposed of at the Labrador West Regional Landfill on a weekly basis or more frequently as required. Access to the site will be restricted to prevent indiscriminate dumping and access. Portable lavatories will be utilized as required by employees during operating hours and maintained by a certified waste management service provider (i.e. Pardy's Waste Management or equivalent) on a weekly basis or as needed. No permanent infrastructure is required on site and any scrap metal or equipment no longer useable will be removed from site and disposed of at a scrap yard or approved metal recycling facility or service provider. Domestic waste will be collected and disposed of in accordance with the *Environmental Protection Act (2002)*.

4.4.4 Fuel

Fuel used by heavy equipment on site will be delivered directly by a petroleum product service company as required. No fuel storage tanks will be located on the site, however storage tanks with a capacity of >2,500 litres, if required in the future, and the refueling of

equipment on site are subject to the Storage and Handling of Gasoline and Associated Products Regulations which will be followed. Emergency spill response kits will always be available on-site during quarry operations for containment and cleanup of any hydrocarbon leaks from malfunctioning equipment. Personnel working on the project will be knowledgeable about response procedures. All mechanical equipment using fuels will be kept in good operating order with regular inspections and servicing by certified mechanics to prevent incidents of hydrocarbon spills. Any leaks or spills of more than 70 liters will be reported to the Environmental Emergency Telephone Line, cleaned up immediately and contained. Storage, handling and disposal of used/ waste oil or contaminated materials will follow the *Used Oil and Used Glycol Control Regulations*.

4.4.5 Effluent

The effluent generated during quarry operations is likely to be in the form of surface water transporting fine-grained particles from the quarry floor during rainfall events. Site runoff will initially follow the natural topography that slopes gently towards the north and east. There are currently no obvious concerns with pooling water inside existing quarry areas, and the permeable subsurface sand and gravel is expected to provide good drainage. Shallow ditching inside the proposed development area will ensure runoff is collected and drained to the eastern permit boundary (**Figure 3**) where there is ample vegetation buffering to sensitive marine habitats. The monitoring of drainage will occur during all stages of quarry construction and development to ensure discharged site water meets the regulatory requirements of the *Environmental Control Water and Sewage Regulations (2003)*.

The installation of rock check dams, hay bales, and silt fencing will collect and remove suspended fine-grained particles from site runoff water before exiting the boundary. These measures, though circumstantial, will be in line with industry's best practices to reduce suspended fine-grained particles from entering nearby wetlands, watercourses and waterbodies. During major rainfall events additional areas may be constructed to temporarily hold water within the quarry and allow for suspended fine-grained particles to settle out.

4.5 Potential Resource Conflicts During Construction and Operation

Quarrying at the Butlers pit quarry area began in the 1990's and started extracting aggregate from a large sand and gravel esker that extends southeast from Moosehead Lake. Cabin areas with Private Land Grants exist between 1.8 km and 6.7 km to the north of the project (**Figure 4**). Labrador Winter Tails Inc. are issued a license for a snowmobile trail that crosses the Butlers quarry area near the existing security gate but beyond the

Allard quarry permits and application area (**Figure 3**). Land use in the project area may include cabin dwellers and others using the land for snowmobiling, fishing, hunting, berry harvesting, and domestic wood cutting. The quarry operations will ensure these activities can continue in a safe manner. Warning signs of potential quarry hazards will be clearly placed at the quarry entrance that will be secured by a lockable metal hinged gate. Domestic wood harvesting is not anticipated to be impacted by the quarry operations considering the overall size of the domestic cutting area compared to the permit application area with many other options to meet local demand. Additionally, the region has been utilized for commercial mining, and this will not be impacted by the quarry operations but will instead help provide aggregates to the mining industry, maintaining and possibly creating additional local employment.

The proposed quarry boundary allows for the regulated buffer distance to any wetland, waterbody or watercourse to be maintained thus protecting the natural environment that is valued by recreational users. Any encounter with wildlife will follow regulations stated in the Wildlife Regulations under the *Wildlife Act (CC. 96-809). As noted above,* domestic waste will be disposed of appropriately off-site to avoid attracting wildlife.

The quarry area is located adjacent to watercourses, waterbodies or wetlands, and the boundaries are within the regulated buffer distance required by the Mineral Lands Division and the Water Resources Management Division of the Department of Environment, Conservation and Climate Change. Precautionary measures to prevent suspended solids from reaching any watercourses are components of the proposed quarry development plan, as discussed in **Section 4.4.5** and summarized as follows:

- A 5 m wide buffer zone along the permit boundaries will be left undeveloped where no materials will be excavated providing a perimeter berm to contain surface water inside the quarry area.
- The quarry excavation depths will remain above the water table and shallow drainage channels will be constructed that direct surface run-off into designated collection and discharge areas that daylight with topography.
- The use of rock check dams, hay bales and silt fencing inside the quarry will remove suspended fine-grained particles prior to entering vegetated buffer areas established outside the quarry boundary separating marine and wetland habitat areas.

4.6 Occupation

The occupations required for the proposed quarry site are listed below and classified as per the National Occupational Classification (2021):

Construction

- 1 Heavy Equipment Operator –Excavator/Dump Truck (73400)
- 1 Heavy Equipment Operator – Tree Harvester/Mulcher (84110)

Operation

- 1 Quarry Supervisor (73400)
- 2 Heavy Equipment Operators – Loader/Excavator (73400)
- 2-3 Heavy Equipment Operators –Crusher/Screener (73400)
- 2-4 Heavy Equipment Operators – Dump Truck/Tandems/Dump-Trailers (73400)

The operation of the quarry will require up to 10 employees to run at peak capacity with anticipated production rate of less than 20,000 tonnes annually, although fluctuations in material demand may lead to a change in the number of required employees and annual production volumes.

4.7 Reclamation and Closure

Rehabilitation of the quarry area will begin once the sand and gravel resources are exhausted or continue progressively as areas are no longer suitable for operations. The future quarry plans will be defined in a set of development, rehabilitation and closure plans submitted to and approved by the Mineral Lands Division of the Department of Energy and Mines. Quarry faces will be a maximum of 5 m in height with designed bench spacing to allow safe 30-degree rehabilitation slopes and 2 m catch bench berms where multiple development faces are created. Historic disturbed areas outside the permit boundary will be rehabilitated as presented in the DRC plans once approved. Organic material that was stripped and preserved from the development area will be re-spread over the sloped and quarry floor area to promote natural revegetation. The revegetated quarry area will then continue to regenerate and blend with the surrounding natural landscape.

5.0 APPROVAL OF THE UNDERTAKING

Table 1 on the following page contains a list of referral agencies, permits/approvals required and responses received in 2022 from the quarry permit application process to the Department of Energy and Mines.

Table 1: Referral Agencies, Responses and Possible Permits Required

Department/Regulatory Agency	Status	Possible Required Approvals/Permits
Provincial Archaeology Office	Comments Pending EA Registration (Previously Approved)	
Environment, Conservation and Climate Change- Water Resources Management Division (WRMD)	Comments Pending EA Registration (Previously Approved)	Water Management Plan
Environment, Conservation and Climate Change- Environment and Wildlife	Comments Pending EA Registration (Previously Approved)	Operate Under Established Legislation, Rehabilitate Depleted/Unused Quarry Areas
Environment, Conservation and Climate Change - Environmental Assessment Division	Project Registration Required	Environmental Assessment Registration
Digital Government & Service NL	Comments Pending EA Registration	Gasoline and Associated Products Registration
Energy and Mines - Mineral Lands Division	Comments Pending EA Registration (Previously Approved)	Quarry Lease (Development, Reclamation & Closure Plans)
Municipal and Provincial Affairs Local Governance and Land Use Planning	Comments Pending EA Registration (Previously Approved)	
Transportation and Infrastructure	Comments Pending EA Registration (Previously Approved)	
Department of Labrador Affairs	Comments Pending EA Registration (Previously Approved)	
Tourism, Culture, Arts and Recreation - Tourism	Comments Pending EA Registration (Previously Approved)	
Tourism, Culture, Arts and Recreation – Parks NL	Comments Pending EA Registration (Previously Approved)	
Fisheries and Aquaculture – Aquaculture	Comments Pending EA Registration (Previously Approved)	
Fisheries and Aquaculture – Fisheries	Comments Pending EA Registration (Previously Approved)	
Forestry, Agriculture and Lands – Lands Management	Comments Pending EA Registration (Previously Approved)	
Forestry, Agriculture and Lands – Agriculture	Comments Pending EA Registration (Previously Approved)	
Forestry, Agriculture and Lands - Forestry	Comments Pending EA Registration	Operating Permit & Commercial Cutting Permit
Forestry, Agriculture and Lands - Crown Lands	Comments Pending EA Registration	

6.0 SCHEDULE

The proposed schedule for this project is as follows:

Submission of Registration Document	February 2026
Release of Submission Document (Minister of Environment, Conservation and Climate Change)	March 2026
Commencement of Construction and Operations	June 2026

7.0 FUNDING

The proponent will provide funding for the construction and operation of the project.

8.0 LIMITATIONS

This environmental registration document was prepared by NCD Consulting Ltd. in consultation with Allard Distributing Ltd. for their use under the terms defined in a written contract between the two parties. The information included in this document relates to the scope of the proposed project exclusively. NCD Consulting Ltd. has collaborated with the client and utilized NCD's combined extensive knowledge in quarry development and environmental regulations, to as accurately as possible and with the information available, at the time of drafting this document, layout the development of the site in a safe and environmentally sustainable manner.

Name: Mr. Gilles Allard
President
Allard Distributing Ltd.

FEB. 03/ 2026
Date