

Exhibit 6
Environmental and Regulatory Compliance Requirements
Agreement Number: CD0502-001

EXHIBIT 6

ENVIRONMENTAL AND REGULATORY COMPLIANCE REQUIREMENTS

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1 INTRODUCTION

This Exhibit 6 - Environmental and Regulatory Compliance Requirements specifies the Contractor's responsibilities with respect to compliance with Applicable Laws during construction activities at the LCP.

1. The Contractor shall demonstrate a strong commitment to environmental management and must operate, and ensure that all members of the Contractor Group operate in accordance with Canadian standards and fulfill all Applicable Laws, including regulatory requirements, pertaining to the Work and Worksites.
2. The Contractor shall place high priority on environmental protection while performing Work and is responsible for maintaining an environmentally compliant Worksite at all times whether the Work is temporary or permanent.
3. The Contractor shall not cause, permit nor tolerate an environmentally non-compliant condition or activity over which it has control. The Contractor shall immediately inform the Company of any environmentally non-compliant condition or work practice of which it becomes aware but over which it has no authority to correct.

2 CONTRACTOR'S RESPONSIBILITIES - REGULATORY AGENCIES

2.1 General

1. The Contractor shall ensure Work areas are available for inspection by the Authorities. All inspections, other than by the Company Representative, will be arranged in advance through the Company.
2. Any violations of environmental permits or authorizations, or any environmental related incidents observed by inspectors representing Authorities, are to be reported to the Company prior to leaving the Site. Except in emergencies, environmental protection measures required by Authorities shall be subject to the Approval of Company prior to implementation.
3. The Contractor shall ensure that Contractor's Personnel, including machinery and equipment operators and truckers, comply with (a) the terms and conditions of the Agreement, (b) all environmental Applicable Laws and applicable permits, (c) requirements of Authorities, and (d) such other rules and regulations as the Company may establish and notify the Contractor.
4. Contractor shall ensure that all members of the Contractor Group shall not harass wildlife or waterfowl or unduly disturb fish. Hunting and fishing are not permitted on the Site. Any contravention of environmental requirements, including employee actions accidental or otherwise, resulting in environmental damage shall be reported to the Company without delay.

5. In accordance with the Agreement, the Contractor shall be responsible for customs clearance, import permits, Work validations, Work permits and operating licenses in the port of mobilization / demobilization of the Work, and other requirements that are essential to the Work during all phases of the Work.

2.2 Permits

1. The Contractor shall review the Work to identify all permits, authorizations and certificates that are required for all the Contractor's facilities and the Work. Within the time specified in Section 3.1 below, Contractor shall provide to the Company a permit list (containing all such identified permits, authorizations, and certificates), to be entered into a permit registry on Aconex. Once entered, the Company shall have the authority to assign to either the Contractor or the Company the responsibility for preparing the permit applications.
2. Appendix A - List of Permits, Acceptances and Authorizations provides a list of permits that may be required to undertake the Work and responsibility for completing permit applications. This is a preliminary list and the Contractor shall complete its own list and submit it to the Company for Approval. In addition, the responsibility outlined on this list may be changed by written instructions from the Company to the Contractor due to changes in the Work or schedule constraints.
3. For those permits identified as the responsibility of the Contractor, the Contractor shall identify and prepare applications for all authorizations, permits, dispensations, consents and licenses required by Applicable Laws to enable it to perform the Work. All permit applications identified as the responsibility of the Contractor shall be submitted to the Company for internal review a minimum of 3 weeks prior to the date that such authorization, permit, dispensation, consent or license is submitted to the Authority. The Company will then submit the permit to the applicable Authority, on behalf of the Contractor. The Company will obtain the permit, and forward a copy to the Contractor immediately upon receipt and before the Contractor's facilities are used or the Work is undertaken. The Contractor shall ensure that it receives a copy of the permit and complies with the permit conditions.

For Service NL building permits, the Contractor shall submit electronically one application package for each building on Site. Such package will include:

- The fire and life safety review application and the Building Accessibility/Exemption application together as one PDF;
 - All electrical and mechanical permits associated with each building;
 - Any other required approval for buildings/utilities; and
 - The related drawings for the building in a separate PDF document. This PDF shall be created from the full size auto cad drawings.
4. For those permits identified as the responsibility of the Company, the Contractor shall provide information as required in a timely manner to complete the relevant applications.

The Contractor shall ensure that permits designated as the responsibility of the Company that are required for the Work are in place prior to starting the Work.

5. It should be noted that some authorizations associated with the LCP are subject to an aboriginal consultation process. This process requires that permit applications are provided to relevant aboriginal organizations by the associated Authority for a period of at least 30 days.
6. The Contractor shall take into consideration all these additional reviews and approvals, and the associated timelines, and ensure applications are prepared with the incorporation of these timelines.
7. For permits already in place for existing facilities and permits that the Contractor holds to carry out its business and daily activities, the Contractor must provide a copy of these permits to the Company prior to the start of the Work.
8. The *Storage and Handling of Gasoline and Associated Products Regulations, 2003* (referred to as the "GAP Regulations") under the *Environmental Protection Act* of Newfoundland and Labrador applies to the construction, operation and registration of "storage tank systems"¹ in the Province of Newfoundland and Labrador. While Section 3 of the GAP Regulations explicitly exempts storage tank systems of capacity of 2,500 litres or less that are connected to a heating appliance (e.g. tanks controlled by the *Heating Oil Storage Tank System Regulations, 2003* of Newfoundland and Labrador), all other "stationary" tanks (i.e. tanks installed in a fixed location) may be interpreted as falling under the control of these regulations. Following this strict interpretation, even very small tanks (e.g. less than 5 litre tanks connected to small generators, water pumps, etc. installed in temporary locations) may fall under control of the GAP Regulations.

Contractor shall provide Notice to Company of any and all storage tanks, storage tank systems and equipment storage tanks proposed by Contractor for use on the Site at least one (1) week prior to such use, along with all information pertaining to such tanks and systems as required by Company. If requested by Company, Contractor shall obtain written dispensation from the application of the GAP Regulations from the applicable Authority prior to such use of tanks or systems that are not already registered under GAP Regulations. Any required tank or system registration must be accompanied by any necessary regulatory variances.

In general, the GAP Regulations apply to all stationary storage tanks and storage tank systems except in the following cases:

¹ The GAP Regulations defines "storage tank system" as an "... atmospheric or low pressure closed tank container and all vents, fill and withdrawal piping associated with it installed in a fixed location and includes temporary arrangement on cradles and skids".

- Tanks with capacities of 2,500 liters or less that are connected to a heating appliance;
- Tanks that are designed, constructed and utilized in the inherent operation of a piece of equipment. In this case, the tanks must be physically secured and dedicated to the equipment requiring the fuel for its operation; and
- "Mobile" tanks (e.g. tank trucks and tank truck trailers) used for temporary, stationary storage. In this case, storage period must not exceed 14 days and no additional fuel can be added to the tank. There must also be a minimum of 14 days of downtime between separate storage periods and there can be no more than two 14-day storage periods within a 12 month time frame.

Note that all provisions of the GAP Regulations, including registration, apply for all tanks associated with mobile generators.

Notwithstanding the above provisions of this Section 2.2.8, Contractor shall be solely responsible to comply with all Applicable Laws relating to the Work, and nothing in this Section 2.2.8 shall be construed so as to restrict, limit, waive or otherwise diminish Contractor's responsibility and liability to comply with all such Applicable Laws.

3 CONTRACT-SPECIFIC ENVIRONMENTAL PROTECTION PLAN (C-SEPP)

1. Within two (2) weeks after the Execution Date, the Contractor shall submit to the Company for Approval, a Contract Specific Environmental Protection Plan (C-SEPP) for the Work using the C-SEPP template provided in the Agreement. No Site Work shall take place until the Company has Approved the C-SEPP.
2. The Contractor's C-SEPP shall be based upon the *General Environmental Requirements* of the Technical Specification of this Agreement (if applicable), the Project Wide Environmental Protection Plan (in Exhibit 11 - Company Supplied Documents), and the Contractor's own corporate environmental management system.
3. The C-SEPP is prepared by the Contractor and is specific to the Work. The C-SEPP provides a practical way for the Contractor to demonstrate its understanding of environmental regulations, practices and procedures required to reduce, or eliminate, potential negative environmental effects.
4. The Contractor's C-SEPP shall include the following, at a minimum (refer to the C-SEPP template for all requirements):
 - a description of the construction sequence (e.g. GANTT Chart);
 - roles and responsibilities;
 - mitigation procedures for all areas of environmental concern;
 - procedures for environmental monitoring;
 - maintenance requirements for environmental control structures;
 - procedures for post-activity clean-up and demolition; and
 - contingency planning for environmental concerns.

5. The Contractor's C-SEPP shall also include any permits, registrations or notifications, required by Federal, Provincial, or aboriginal stakeholders for the proposed activities. The Contractor may be required to prepare additional environmental documentation prior to any fieldwork for non-time critical activities.
6. The Contractor is responsible for implementing, resourcing, and periodically verifying the C-SEPP. Contractor shall provide Company with an implementation schedule for the plan and with an update provided on a quarterly basis.

4 REPORTING

1. The Contractor shall conduct daily inspections of the Work to confirm environmental compliance. The inspections shall be documented by the Contractor in daily reports which shall be kept on file. Any non-compliance and corrective actions shall be documented by the Contractor.
2. The Contractor shall immediately notify the Company of all environmental incidents, including any loss of hazardous or controlled products. **Any spill meeting the following criteria shall be reported immediately to the Canadian Coast Guard at 709-772-2083 or 1-800-563-9089:**
 - a. Any spill on a natural water body (marine or freshwater); or
 - b. Any land-based spill:
 - i. that is over 70 litres; or
 - ii. of any quantity that has the potential (e.g. by migrating through subsurface soils/bedrock/substructures², etc) to enter a natural water body; or
 - iii. of any quantity that has the potential to impact a privately owned property.
3. Once the spill is reported to the Canadian Coast Guard, the Company will liaise with other Authorities to provide additional information, as required.
4. The Contractor shall provide the Company with a monthly environmental performance report for the Work. The monthly cut-off for each report shall be the close of business day up to and including the final day of each calendar month. The Contractor's environmental performance report shall include, without limitation, the following:
 - i. Hazardous and other waste generated during the period;
 - ii. Environmental incidents, including loss of fuel or other hazardous products; and
 - iii. Reported non-compliance and associated corrective actions.
5. The Contractor shall complete and submit to the Company a Monthly Fuel Consumption Report, in the form as set out in Appendix C - Monthly Fuel Consumption Report, no later than 7 days after the end of each calendar month.

² sewer systems, conduits, tunnels, etc

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APPENDIX A

LIST OF PERMITS, ACCEPTANCES AND AUTHORIZATIONS

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	Permit	Regulatory Body	Act	Responsibility for Completing Permit Applications
1	Application for Crown Lands - LCP related Infrastructure	DOEC	<i>Lands Act of Newfoundland and Labrador</i>	Company
2	Application for Crown Lands - Contractor Facilities	DOEC	<i>Lands Act of Newfoundland and Labrador</i>	Contractor
3	Notice of Intent for Reservation of Shoreline	DOEC	<i>Lands Act of Newfoundland and Labrador</i>	Company
4	Application for Water and Sewerage Works Permit	DOEC	<i>Water Resources Act of Newfoundland and Labrador, Sections 36, 37 and 48</i>	Contractor
5	Permit to Alter a Body of Water and Schedule A (Culverts)	DOEC	<i>Water Resources Act of Newfoundland and Labrador, Section 48</i>	Company
6	Permit to Alter a Body of Water and Schedule B (Bridges)	DOEC	<i>Water Resources Act of Newfoundland and Labrador, Section 48</i>	Company
7	Permit to Alter a Body of Water and Schedule C (Dams)	DOEC	<i>Water Resources Act of Newfoundland and Labrador, Section 48</i>	Company
8	Permit to Alter a Body of Water and Schedule D (Fording)	DOEC	<i>Water Resources Act of Newfoundland and Labrador, Section 48</i>	Company
9	Permit to Alter a Body of Water and Schedule E (Pipe Crossing - Water Intake)	DOEC	<i>Water Resources Act of Newfoundland and Labrador, Section 48</i>	Company

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	Permit	Regulatory Body	Act	Responsibility for Completing Permit Applications
10	Permit to Alter a Body of Water and Schedule F (Stream Modifications)	DOEC	<i>Water Resources Act of Newfoundland and Labrador, Section 48</i>	Company
11	Permit to Alter a Body of Water and Schedule G (Small Bridges)	DOEC	<i>Water Resources Act of Newfoundland and Labrador, Section 48</i>	Company
12	Permit to Alter a Body of Water and Schedule H (Other Alterations)	DOEC	<i>Water Resources Act of Newfoundland and Labrador, Section 48</i>	Company
13	Application for Permit for Drilling a Non-Domestic Well - LCP related Infrastructure	DOEC	<i>Water Resources Act of Newfoundland and Labrador, Section 58</i>	Company
14	Application for Permit for Drilling a Non-Domestic Well - Contractor Facilities	DOEC	<i>Water Resources Act of Newfoundland and Labrador, Section 58</i>	Contractor
15	Application for Water use License - LCP related Infrastructure	DOEC	<i>Water Resources Act of Newfoundland and Labrador, Section 48</i>	Company
16	Application for Water use License - Contractor Facilities	DOEC	<i>Water Resources Act of Newfoundland and Labrador, Section 48</i>	Contractor
17	GAP Registration	Service NL and DOEC	<i>Environmental Protection Act of Newfoundland and Labrador</i>	Contractor
18	Diesel Generator Registration Form	Service NL	<i>Environmental Protection Act of Newfoundland and Labrador</i>	Contractor

	Permit	Regulatory Body	Act	Responsibility for Completing Permit Applications
19	Permit for Access of any Highway	Service NL	<i>Urban and Rural Planning Act, 2000</i> of Newfoundland and Labrador <i>Works, Services and Transportation Act</i> of Newfoundland and Labrador	Company
20	Highway Services Signs Application	DTW	<i>Urban and Rural Planning Act, 2000</i> of Newfoundland and Labrador, subsections 36(2) and 39(2)	Contractor
21	Asphalt Plant Construction and Operation Form	Service NL	<i>Environmental Protection Act</i> of Newfoundland and Labrador	Contractor
22	Building Accessibility Design Registration / Exemption Registration - LCP related Infrastructure	Service NL	<i>Buildings Accessibility Act</i> of Newfoundland and Labrador	Company
23	Building Accessibility Design Registration / Exemption Registration - Contractor Facilities	Service NL	<i>Buildings Accessibility Act</i> of Newfoundland and Labrador	Contractor
24	Fire and Life Safety Review Plan (National Building Code) - LCP related Infrastructure	Service NL	<i>Buildings Accessibility Act</i> of Newfoundland and Labrador	Company

	Permit	Regulatory Body	Act	Responsibility for Completing Permit Applications
25	Fire and Life Safety Review Plan (National Building Code) - Contractor Facilities	Service NL	<i>Buildings Accessibility Act of Newfoundland and Labrador</i>	Contractor
26	Used Oil Storage Tank System Application	DOEC	<i>Environmental Protection Act of Newfoundland and Labrador</i>	Contractor
27	Mobile Fuel Storage Tank Relocation	Service NL	<i>Environmental Protection Act of Newfoundland and Labrador</i>	Contractor
28	Design Registration of Pressure Piping System	Service NL	<i>Public Safety Act of Newfoundland and Labrador</i>	Contractor
29	Elevating Devices	Service NL	<i>Public Safety Act of Newfoundland and Labrador</i>	Contractor
30	Food Establishment License Temporary Facility	Service NL	<i>Food and Drug Act of Newfoundland and Labrador</i>	Contractor
31	Septic Systems less than 4,546 L/day flow	Service NL	<i>Water Resources Act of Newfoundland and Labrador</i>	Contractor
32	Commercial Cutting/Operating Permit - LCP related Infrastructure	DNR	<i>Forestry Act of Newfoundland and Labrador</i>	Company
33	Commercial Cutting/Operating Permit - Contractor Facilities	DNR	<i>Forestry Act of Newfoundland and Labrador</i>	Contractor
34	Application for a Quarry Permit - LCP related Infrastructure	DNR	<i>Quarry Materials Act, 1998 of Newfoundland and Labrador</i>	Company

	Permit	Regulatory Body	Act	Responsibility for Completing Permit Applications
35	Application for a Quarry Permit - Contractor Facilities	DNR	<i>Quarry Materials Act, 1998</i> of Newfoundland and Labrador	Contractor
36	Permit to Destroy Problem Animals	DNR	<i>Wildlife Act</i> of Newfoundland and Labrador	Company
37	Archaeological Investigation Permit	DTCR	<i>Historic Resources Act</i> of Newfoundland and Labrador	Company
38	Application for Authorization for Works or Undertakings Affecting Fish Habitat - Assessment of Freshwater HADD	DFO	<i>Fisheries Act</i> of Canada, Section 35(1)	Company
39	DFO Referral for any in-water works	DFO	<i>Fisheries Act</i> of Canada, Section 35(2)	Company
40	Request for Project Review	DFO	<i>Fisheries Act</i> of Canada, Section 35(1)	Company
41	Application for License to Install and Operate a Radio Station in Canada - LCP related Infrastructure	IC	<i>Radiocommunication Act</i> of Canada	Company
42	Application for License to Install and Operate a Radio Station in Canada - Contractor Facilities	IC	<i>Radiocommunication Act</i> of Canada	Contractor

	Permit	Regulatory Body	Act	Responsibility for Completing Permit Applications
43	Acceptance to Dispose Waste in Municipal Landfill	Service NL and Municipality (Town of Happy Valley Goose Bay)	<i>Municipalities Act, 1999 of Newfoundland and Labrador</i>	Contractor
44	Municipal Development Plan	DMA	<i>Municipalities Act, 1999 of Newfoundland and Labrador</i>	Company
45	Explosives User Magazine Licence (Type U)	NRCAN	<i>Explosives Act of Canada</i>	Contractor
46	Type A (Annual) Import Permit (to transport explosives)	NRCAN	<i>Explosives Act of Canada</i>	Contractor
47	Nav Canada Land Use Division Review	Nav Canada	<i>Aeronautics Act of Canada</i>	Contractor
48	Aeronautical Obstruction Clearance Form	TC	<i>Aeronautics Act of Canada</i>	Contractor
49	Navigable Waters Protection Act (NWPA)	TC	<i>Navigable Waters Protection Act of Canada, Section 4</i>	Company
50	Permit to Transport Dangerous Goods	TC	<i>Transportation of Dangerous Goods Act, 1992 of Canada, Section 3</i>	Contractor

APPENDIX B

ABBREVIATIONS AND ACRONYMS

Abbreviations	Description
C-SEPP	Contract-Specific Environmental Protection Plan
DFO	Department of Fisheries and Oceans (Canada)
DOEC	Department of Environment and Conservation (Newfoundland and Labrador)
DNR	Department of Natural Resources (Newfoundland and Labrador)
DMA	Department of Municipal Affairs (Newfoundland and Labrador)
DTCR	Department of Tourism, Culture and Recreation (Newfoundland and Labrador)
DTW	Department of Transportation and Works (Newfoundland and Labrador)
GAP Regulations	<i>Storage and Handling of Gasoline and Associated Products Regulations, 2003</i> of Newfoundland and Labrador.
IC	Industry Canada
NRCAN	Natural Resources Canada
NWPA	<i>Navigable Waters Protection Act</i> of Canada
P-WEPP	Project-Wide Environmental Protection Plan
TC	Transport Canada

APPENDIX C

MONTHLY FUEL CONSUMPTION REPORT



MONTHLY FUEL CONSUMPTION REPORT¹		
Contractor's Name:	_____	
Report completed by (please print):	_____	
Signature:	_____	
Reporting month/year (mm/yyyy):	_____	
Report date (dd/mm/yyyy):	_____	
Agreement Number:	_____	
Agreement Name:	_____	
Consumed Fuel		
Fuel Type	unit	quantity
Diesel	litres	
Gasoline	litres	
Heating oil	litres	
Propane	litres	
aviation turbo fuel	litres	
kerosene	litres	
Other (specify type)		
1	litres	
2	litres	
3	litres	
4	litres	
5	litres	
6	litres	
Total		
<p>Notes:</p> <p>1 To be completed by Contractor and submitted to the Engineer for each calendar month, no later than 7 days after end of each month.</p> <p>2 Consumed fuel to be reported is defined as:</p> <p style="margin-left: 20px;">a) quantity of fuel transferred during the reporting month to tanks of all LCP-dedicated vehicles, equipment, and facilities, or</p> <p style="margin-left: 20px;">b) quantity of fuel used in the reporting month as part of a process (such as ANFO used for explosives); or</p> <p style="margin-left: 20px;">c) quantity of fuel delivered to bulk storage tanks at Company's Laydown Area within the reporting month by the Fuel Delivery Services Contractor.</p> <p>3 Contractor shall provide as part of the Monthly Fuel Consumption Report a general listing of all types of equipment, facilities, and processes that have burned fuel during the reporting month. The types of equipment, facilities, and processes include, but are not limited to, the following: heavy equipment (e.g. excavators, bull dozers, concrete trucks, etc); light equipment and vehicles (e.g. pick-up trucks, chain saws, pumps); facilities (e.g. diesel generators, concrete production, etc); processes (e.g. explosives in ANFO, etc); etc.</p>		
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