

1 Q. Figure 8: Delivery strategy p.41 of 92 of Submission shows EA works done under
2 separate leadership from the EPC work. How will the commitments under the EA be
3 ensured and how will the EA ensure that it does not overcommit beyond optimal
4 choices from an EPC perspective?

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7 A. Commitments under the Environmental Assessment (EA) process, including
8 mitigation measures identified in the Environmental Impact Statement (EIS),
9 through the Joint Review Panel (JRP) Hearings and in responses to Information
10 Requests (IR's), become part of the project scope and as such are communicated to
11 the project team for inclusion in the project scope of work and the Basis of Design.
12 Nalcor is leading the Project Environmental Process with a dedicated group within
13 the overall Nalcor Project Management team.

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15 Nalcor has also assigned resources to ensure the commitments identified above are
16 communicated and reflected in the design, purchasing and contract documents
17 which are produced by its engineering consultant, SNC-Lavalin, who have an
18 Engineering, Procurement and Construction Management (EPCM) contract with
19 Nalcor. Nalcor reviews the deliverables produced by the EPCM contractor and
20 ensures compliance with any commitments that Nalcor has made through the EA
21 process. During construction, the approved Environmental Protection Plan (EPP),
22 which contains the operational and construction related environmental protection
23 methods, shall apply. The EPP shall be in compliance with commitments made by
24 Nalcor and the EPP also flows through to any Contractors and Sub Contractors. It is
25 the responsibility of the Project Site team to ensure compliance in this regard.

1 All contracts and purchase orders will require compliance with the EIS, EPP,
2 specifications, design and contract documents, which in turn reflect the
3 commitments made by Nalcor regarding EA. As a result, compliance with
4 regulatory and legal requirements and Nalcor's commitments is required, with no
5 opportunity to over or under-commit.