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Webequie Supply Road Project

ACCIDENTS AND MALFUNCTIONS PREVENTION AND RESPONSE PLAN

WSR

WEBEQUIE

SUPPLY ROAD

AtkinsRéalis

WEBEQUIE FIRST NATION

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1. Purpose

The purpose of this Accidents and Malfunctions Prevention and Response Plan (AMPRP) is to establish measures to prevent, prepare for, and respond to accidents and malfunctions associated with the Webequie Supply Road Project (the Project) that may result in adverse effects. This Plan has been developed and will be implemented during all applicable phases of the Project to fulfill Conditions 9 (9.1 to 9.4) established in the Decision Statement (approval) issued under the *Impact Assessment Act* (IA Act) for the Project on June 25, 2026. Conditions 9 (9.1 to 9.4) state:

9 Accidents and malfunctions

9.1 The Proponent shall take all reasonable measures to prevent accidents and malfunctions that may result in adverse federal effects and mitigate any adverse federal effects from accidents and malfunctions that do occur. As part of these measures, the Proponent shall:

9.1.1 undertake routine inspections of Designated Project components including bridges, culverts, road embankments, and upstream and downstream riverbanks, and complete repairs where required;

9.1.2 design Designated Project infrastructure to meet applicable codes and standards that address seismic activity, wildfires, and extreme weather events;

9.1.3 design water management structures such as bridges, culverts and ditches to accommodate extreme weather events based on historical climate data and projected future changes in extreme rainfall over the lifespan of the structures; and

9.1.4 inform Designated Project employees and contractors of applicable prevention and response measures.

9.2 The Proponent shall develop, prior to construction, and implement during all phases of the Designated Project, accidents and malfunctions response plans in relation to the Designated Project. For the development of the accidents and malfunctions response plan with respect to the Webequie First Nation reserve, the Proponent shall initiate consultation prior to construction with Webequie First Nation and relevant authorities and share a version of the response plan updated with the results of the consultation with the Agency within 60 days of the start of construction. For the development of the accidents and malfunctions response plan with respect to non-federal lands within the Local Study Area, the Proponent shall develop the plan in consultation with Indigenous groups and relevant authorities. The accidents and malfunctions response plan shall include:

9.2.1 a description of the potential types of accidents and malfunctions that may cause adverse federal effects, including severe structural failure, major spill, fire, explosion and extreme weather events;

9.2.2 the measures to be implemented in response to each type of accident and malfunction referred to in condition 9.2.1 to mitigate any adverse federal effect caused by the accident or malfunction taking into account Environment and Climate Change Canada's National Wildlife Emergency Response Framework; and

9.2.3 for each type of accident and malfunction referred to in condition 9.2.1, the roles and responsibilities of those involved in the implementation of the measures referred to

in condition 9.2.2, including the Proponent, each relevant authority, and any other party that may be called upon to respond to an accident or malfunction.

9.3 The Proponent shall maintain the accidents and malfunctions response plan referred to in condition 9.1 up to date during construction. The Proponent shall submit any updated accidents and malfunctions response plan to the Agency and to parties consulted for the development of the plan within 30 days of the plan being updated.

9.4 In the event of an accident or malfunction with the potential to cause adverse federal effects during construction, including an accident or a malfunction referred to in condition 9.2.1, the Proponent shall immediately implement the measures appropriate to remedy the accident or malfunction, including any measure referred to in condition 9.2.2, and shall:

- *9.4.1 notify, as soon as feasible, relevant authorities with responsibilities related to emergency response, including environmental emergencies, in accordance with applicable legislative and regulatory requirements;*
- *9.4.2 notify, as soon as feasible, Indigenous groups of the accident or malfunction and notify the Agency in writing no later than 48 hours following the accident or malfunction. In doing so, the Proponent shall specify:*
  - *9.4.2.1 the date and time when and location where the accident or malfunction occurred;*
  - *9.4.2.2 a summary description of the accident or malfunction;*
  - *9.4.2.3 a list of any substance and estimated quantities potentially released into the environment as a result of the accident or malfunction; and*
  - *9.4.2.4 a list of the relevant authorities notified pursuant to condition 9.2.3 and of the relevant authorities engaged in response to the accident or malfunction;*
- *9.4.3 submit a written report to the Agency no later than 60 days after the day on which the accident or malfunction occurred. The written report shall include:*
  - *9.4.3.1 a detailed description of the accident or malfunction and of its adverse federal effects;*
  - *9.4.3.2 a description of the measures that were taken by the Proponent to mitigate the adverse federal effects caused by the accident or malfunction;*
  - *9.4.3.3 any view from Indigenous groups and advice from relevant authorities received with respect to the accident or malfunction, its adverse federal effects and the measures taken by the Proponent to mitigate these adverse federal effects;*
  - *9.4.3.4 a description of any residual adverse federal effects and any modified or additional measure required by the Proponent to mitigate residual adverse federal effects;*
  - *9.4.3.5 a description of the changes made to avoid a subsequent occurrence of the accident or malfunction; and*
  - *9.4.3.6 details concerning the implementation of the accidents and malfunctions response plan referred to in condition 9.2.*

1.1 Objectives

The objectives of the AMPRP are to:

- Prevent accidents and malfunctions associated with the Project through proactive planning, design, training, inspection, and operational controls;
- Reduce the likelihood and severity of spills, structural failures, vehicle incidents, fires, and extreme weather–related events that could result in adverse federal effects;
- Establish and implement effective spill prevention and hazardous materials management measures, including secondary containment, controlled maintenance activities, and safe refuelling practices;
- Provide a clear and coordinated response framework to manage accidents and malfunctions and limit adverse effects on human health, the environment, Indigenous use of land and resources, and Project infrastructure;
- Ensure timely containment, cleanup, notification, and reporting following an accident or malfunction, in accordance with regulatory requirements and approval conditions; and
- Support compliance and continuous improvement by incorporating lessons learned, monitoring results, and consultation feedback into updated prevention and response measures throughout applicable Project phases.

1.2 Scope

This AMPRP applies to all Project activities conducted on Webequie First Nation reserve lands and non-federal lands for the Webequie Supply Road (WSR) and temporary and permanent areas needed to support the Project that include access roads, construction camps, laydown and storage yards, aggregate pits/quarries, and a Maintenance and Storage Facility.

The Plan is applicable during:

- Construction;
- Operations and maintenance; and
- Decommissioning of temporary workspace and infrastructure during construction phase, where applicable.

1.3 Regulatory Context

This AMPRP has been developed in accordance with:

- *Impact Assessment Act;*
- Impact Assessment Agency of Canada (IAAC) Decision Statement Conditions 9.1 to 9.4;
- Ontario Environmental Protection Act and applicable spill regulations;
- *Transportation of Dangerous Goods Act*;
- National Fire Code of Canada; and
- Applicable Ontario Ministry of Transportation (MTO) design standards.

1.4 Engagement and Consultation

Engagement and consultation are an important component of accident and malfunction planning and response and supports transparent communication, incorporation of Indigenous Knowledge, and fulfillment of regulatory requirements. Ongoing engagement and consultation activities related to accident and malfunction preparedness, response, and follow-up are intended to ensure that Webequie First Nation and other Indigenous communities and relevant authorities are informed of potential risks, response measures, and notification procedures, and that their views, concerns, and advice are considered in the development and implementation of the AMPRP. Ongoing engagement will support continuous improvement of accident and malfunction prevention and response measures and ensure that communication protocols remain culturally appropriate, timely, and effective throughout applicable phases of the Project.

2. Roles and Responsibilities

The roles and responsibilities for key Proponent staff responsible for implementing the AMPRP are provided in **Table 1**.

Table 1: Roles and Responsibilities for Accidents and Malfunctions Prevention and Response

Title or Position	Key Responsibilities
Environmental Director	▪ Oversee the development, implementation, and maintenance of the AMPRP; ▪ Oversee integration of prevention and response measures into Project execution; ▪ Provide senior oversight during accidents or malfunctions; ▪ Approve regulatory and IAAC notifications and reports; ▪ Support Indigenous consultation requirements; and ▪ Ensure continuous improvement through plan review and updates.
Community Relations Lead	▪ Support development and implementation of the AMPRP by coordinating Indigenous consultation; ▪ Facilitating culturally appropriate communication and notification during accidents or malfunctions; ▪ Supporting incident reporting and follow-up with Indigenous communities, IAAC, and relevant provincial authorities; ▪ Documenting Indigenous input; and ▪ Supporting ongoing engagement, plan updates, and continuous improvement.
Proponent Representative	▪ The Proponent Representative, referred to as the Proponent Contract Administrator, will oversee the AMPRP implementation to ensure that appropriate agency notifications are made, and Contractor adherence to the requirements stated in the Plan.
Construction Manager	▪ Support development and on-site implementation of the AMPRP by providing construction-specific input; ▪ Ensure AMPRP requirements are integrated into construction activities and the Construction Environmental Management Plan (CEMP); ▪ Ensure personnel training, availability of spill response equipment, and compliance by contractors; ▪ Direct immediate on-site response actions during accidents or malfunctions; ▪ Support incident reporting and investigations; and ▪ Implement corrective actions to prevent recurrence during construction.
Environmental Monitors	▪ Lead day-to-day implementation of the AMPRP; ▪ Identify accident and malfunction risks and applicable mitigation measures; ▪ Coordinate spill prevention, response, and environmental monitoring activities; ▪ Provide technical direction during incidents; ▪ Ensure timely regulatory, IAAC, and Indigenous notifications and reporting; ▪ Support incident investigations and corrective actions; and ▪ Contribute to AMPRP updates and continuous improvement during construction.
Health and Safety Manager	▪ Support development, implementation, and maintenance of the AMPRP by integrating health and safety requirements into accident and malfunction prevention and response measures; ▪ Support worker training and awareness; ▪ Provide direction on worker safety during incident response;

Title or Position	Key Responsibilities
	▪ Coordinate with the Construction Manager and Environmental Lead during emergencies; and ▪ Support incident investigations and corrective actions to prevent recurrence.
Contractors	▪ Comply with the AMPRP and all applicable Project requirements; ▪ Implement accident and malfunction prevention measures during contracted works; ▪ Ensure personnel are trained and equipped for spill prevention and response; ▪ Immediately report accidents, malfunctions, and near-misses; ▪ Take initial containment and response actions as directed; and ▪ Cooperate with the Proponent during incident response, investigations, reporting, and corrective actions.
On-Site Emergency Response Coordinator	▪ Ensure emergency preparedness, including availability of response equipment and participation in training and drills; ▪ Direct and coordinate on-site response actions during accidents or malfunctions, including site control, hazard isolation, and containment; ▪ Liaise with external emergency responders and coordinate site access and safety; ▪ Initiate incident reporting and support communication with the Environmental Lead and Community Relations Lead; and ▪ Document incident details and support investigations, corrective actions, and continuous improvement.
Emergency Responders	▪ Fire, medical, spill response as required
Indigenous Guardians	▪ Participate in monitoring during construction and incident response, where applicable; ▪ Support identification of potential environmental effects to Indigenous culturally important areas of value and/or interest; ▪ Communicate observations and concerns to the Project Team; and ▪ Support verification of mitigation effectiveness and continuous improvement of prevention and response measures.

3. Potential Accident and Malfunction Scenarios

The following scenarios have potential to cause adverse effects:

- **Spills of Hazardous Materials:**
  - Accidental release of hazardous materials due to on-site storage, handling, dispensing, and/or disposal activities, resulting in an unintended release to the terrestrial or aquatic environment.
  - Accidental release of hazardous material due to on-site use of motor vehicles and equipment, resulting in an unintended release of hazardous materials contained within the vehicle or equipment.
  - Mechanisms of release include human error, motor vehicle or equipment collision, and/or equipment or storage component failure (e.g., ruptured hose, valve failure, containment failure).
- **Fires and Explosions:**
  - An accidental fire or explosion originating from Project motor vehicle or equipment malfunction (e.g., sparking, overheating) leading to change in the terrestrial, aquatic and/or atmospheric environment.
  - An accidental fire or explosion originating from Project vehicle or equipment collision (e.g., fuel tank explosion) leading to change in the terrestrial, aquatic and atmospheric environment.
  - An accidental fire or explosion originating from human error during blasting (e.g., misfire, accidental detonation) leading to change in the terrestrial, aquatic and atmospheric environment.
  - An accidental fire or explosion causing injury to people leading to change in human health (social) environment.
  - An accidental fire or explosion originating from human error at camp with kitchen activity / cooking leading to change in the terrestrial, aquatic and atmospheric environment.
- **Structural Failures:**
  - Failure of a bridge, culvert or road surface leading to sediment discharge or deposit of deleterious substance (e.g., aggregate, sediment) to a watercourse, leading to a change in the aquatic or terrestrial environment.
  - Failure of a bridge, culvert or road surface creating unsafe driving conditions and potential human injury, leading to a change in the human health (social) environment.
- **Vehicle or Equipment Accidents:**
  - Vehicle accidents while transporting construction staff to and from Project site causing injury to people.
  - Vehicle accidents between Project operational / maintenance vehicles and a public road user or wildlife causing injuries or fatalities to people or wildlife.

4. Accident and Malfunction Prevention Measures

Accident and malfunction prevention measures are foundational to reducing risk throughout Project activities. This section describes the overarching prevention measures established in accordance with IAAC Condition 9.1, including routine inspection and maintenance of Project components, application of applicable design codes and standards to address seismic activity, wildfire, and extreme weather events, and design of drainage features and water crossing structures. Collectively, these measures are intended to minimize the likelihood of accidents and malfunctions and reduce the severity of potential adverse effects should an incident occur. **Table 2** lists prevention measures corresponding to each potential accident and malfunction scenarios outlined in Section 3.

In accordance with IAAC Condition 3.3, spill prevention measures are documented in the Spills Prevention Plan, which has been prepared under separate cover and is referenced by, and complementary to, this AMPRP.

4.1 Inspections

Routine and systematic inspections are a key component of accident and malfunction prevention and are essential to identifying potential issues before they result in incidents. Inspections are intended to support early detection of deficiencies, inform timely maintenance or repairs, and reduce the likelihood of accidents and malfunctions, particularly in relation to bridges, culverts, road embankments, drainage features, and associated upstream and downstream areas.

To verify structural integrity, operational performance, and environmental protection measures, the Proponent will conduct routine inspections of:

- Bridges;
- Culverts;
- Road embankments and aggregate pit side slopes; and
- Areas upstream and downstream of water crossings.

Inspections will be increased during spring freshet and following extreme weather events.

4.2 Design Standards

Project components will be designed to meet applicable codes, guidelines, and standards that address site-specific risks, including seismic activity, wildfire, and extreme weather events. Application of appropriate design standards is a fundamental accident and malfunction prevention measure and supports the long-term safety and resilience of Project infrastructure. Incorporating these standards into Project design reduces the likelihood of structural failure, enhances infrastructure performance under adverse conditions, and supports the prevention of accidents and malfunctions throughout the Project lifecycle.

4.3 Flood Resilience

Flood resilience measures are incorporated into Project planning, design, construction, and operations to reduce the likelihood of flooding-related accidents or malfunctions and to limit potential adverse effects should flooding occur. The Project is located in a region characterized by low-gradient terrain, extensive wetlands, and watercourses that experience seasonal freshets and runoff events driven by snowmelt and rainfall. Climate change projections for the Project area indicate an increased likelihood of high-intensity rainfall events, rain-on-snow events, and spring freshets over the lifespan of the Project, necessitating the incorporation of conservative and adaptive flood resilience measures.

Major water management structures, including bridges and culverts, are designed to accommodate, at a minimum, a 1-in-100-year flood event, with allowances for projected future changes in precipitation intensity and frequency. Hydraulic analyses and preliminary design modelling have been completed to inform the sizing and placement of drainage infrastructure and will be refined during detailed design to confirm capacity under extreme rainfall and freshet conditions.

Flood resilience measures include, but are not limited to:

- Sizing bridges and culverts to convey peak flows associated with 1-in-100-year storm events, with additional capacity to account for climate change projections;
- Installation of equalization cross-culverts at appropriate intervals to prevent water level differentials, ponding, and localized flooding along the roadway;
- Design of road embankments with sufficient elevation, drainage layers, and subgrade stabilization to prevent overtopping, saturation, and loss of structural integrity during high-flow events;
- Incorporation of erosion and scour protection measures, such as riprap and geotextiles, at watercourse crossings and drainage outlets to maintain stability during high-velocity flows; and
- Design of ditches and swales to safely convey runoff away from the roadway and toward receiving environments without causing erosion or sedimentation.

During construction and operations, flood resilience is further supported through routine inspections of drainage infrastructure, culverts, bridges, and adjacent upstream and downstream areas, with increased inspection frequency during spring freshet and following major rainfall events. Identified deficiencies, blockages, or damage will be addressed promptly through maintenance or repair activities to maintain drainage capacity and reduce the risk of flooding-related incidents.

Together, these measures support compliance with IAAC Condition 9.1.3 and are intended to minimize the likelihood of flooding-related accidents and malfunctions, protect Project infrastructure, and reduce the potential for adverse effects to the surrounding environment.

4.4 Worker Awareness

Worker awareness is a critical component of accident and malfunction prevention and supports the effective implementation of this AMPRP. Employees and contractors will be informed of applicable accident and malfunction prevention and response requirements, including roles and responsibilities, reporting procedures, and site-specific risks through training, site orientations, toolbox talks, and ongoing communication. Worker awareness measures are intended to promote safe work practices, early identification of potential issues, and timely response to incidents, thereby reducing the likelihood and severity of accidents and malfunctions.

Table 2: Accidents and Malfunctions – Prevention Measures

Potential Accident or Malfunction	Prevention Measures
Spills of Hazardous Materials	***Spill Prevention Plan*** ▪ A Spill Prevention Plan has been developed to meet IAAC Condition 3.3 in the Decision Statement for the Project. This Plan has been prepared under separate cover and is complementary to this AMPRP. The Spill Prevention Plan will be integrated in the n the Construction Environmental Plan (CEMP) and Operational Environmental Management Plan (OEMP) to provide measures to eliminate and reduce the potential for a spill or release of petroleum or other hazardous materials and procedures to be followed in the event of unanticipated emergency situations that may occur during construction of the Project and will be adapted for continuation throughout the operations phase of the Project. The plan will adhere to regulatory requirements including Ontario Occupational Health and Safety Act. ▪ It will be ensured that due care and caution are taken to prevent spills at all times. ▪ An updated on-site spill response and containment plan for each dangerous good/hazardous waste will be maintained in the work area at all times. ▪ On-site Spill Response Coordinators will be designated at construction sites during the construction phase. All contractors working during the construction and maintenance phases of the Project will be thoroughly familiar with provincial/federal spill response compliance procedures and will prevent fuel, lubricants, or compounds from being released. For further details refer to the Spill Prevention Plan that includes prevention measures and Best Management Practices (storage of hazardous materials, training, etc.) to minimize potential risk of spills, including emergency response procedures should the release of contaminants occur on-site.
Fires and Explosions	**General Mitigation Measures** ▪ *Compliance with Regulations* ▫ Petroleum products will be transported in accordance with the federal Transportation of Dangerous Goods Act and Ontario Dangerous Goods Transportation Act. ▫ All petroleum handling and storage will comply with Ontario Technical Standards and Safety Act. ▫ Blasting will be conducted in accordance with Ontario Provincial Standard Specification (OPSS) 120 General Specification for the Use of Explosive. ▪ *Safety Awareness* ▫ Signage indicating current fire hazard potential, updated regularly, will be posted along all roads at adequate intervals during construction and operations. ▪ *Proper Labelling and* Storage ▫ Petroleum products will be labelled as to their contents and stored and handled within designated areas. ▫ Fuelling from unregistered tanks will not be permitted. ▫ Combustible materials such as fuel and/or other hazardous substances will be stored in a safe manner. ▪ *Explosives* Management ▫ Explosives will be stored in secured containers meeting provincial and federal standards. Storage areas will be close to blasting sites to minimize transportation distance. ▫ A Construction Blasting Management Plan for the Project will be prepared prior to initiation of blasting activities which will outline best practices and regulatory requirements for the safe transportation, handling, storage and use of explosives. ▫ Storage facilities for explosives at quarry sites will meet the federal standards and licensing requirements as specified in the *Explosives Act* as well as provincial standards and licensing requirements as specified in the Ontario Regulation 213/91 – Construction Projects, under the *Occupational Health and Safety Act*.

Potential Accident or Malfunction	Prevention Measures
	Vehicle and Equipment – Specific Measures ▪ *Fuel Transportation and* Storage ▫ Fuel (diesel and gasoline) will be transported by tanker trucks, drums, or approved containers. Fuel storage areas will have barricaded double-walled aboveground storage tanks (ASTs) or other suitable tanks with secondary containment measures. ▫ Bulk waste oil will be stored in aboveground oil tanks, which will have secondary containment and a weatherproof cover. ▪ *Fire Suppression and Safety* Equipment ▫ All petroleum product storage sites and mobile transportation units will, at all times, be equipped with appropriate categories of equipment and volumes of fire suppression products. ▫ Petroleum storage tanks will be grounded, and the dispensing tank will be attached with a bonding cable to an appropriate location on the receiving tank prior to commencing fuelling to prevent buildup of static electricity which can potentially lead to fires. ▫ At this time no PFAS-containing foams for fire suppression are proposed due to health and environmental concerns of these chemicals' persistence in the environment and potential links to various health problems. ▪ *Construction and Installation* ▫ Construction, installation, and removal of petroleum storage tank systems will occur under the supervision of a registered licenced petroleum technician. ▪ *Collision Prevention* ▫ Concrete barriers will be installed around all petroleum storage tanks to prevent collisions. **Operational Measures – Fuelling and Handling** ▪ There will be no smoking and no open flames at the petroleum storage area at any time. ▪ All combustible engines will be shutdown during fuelling. **Burning Management Measures** ▪ Where piling and burning is prescribed for vegetation, it will be conducted on-site in accordance with the Ontario Forest Fires Prevention Act and Regulation 207/96 Outdoor Fires under this Act. ▪ Safety precautions will be taken to keep the fire under control when burning of cleared tress. Burn piles will be monitored, to ensure that subsequent fire hazards are not present. Upon completion of the burn, burn piles will be completely extinguished. ▪ No fires will be started without first taking sufficient precautions to ensure that the fire can be kept under control. ▪ Burning will be avoided during the dry season in Northern Ontario (April 1 to October 31). ▪ Active fires will be monitored by staff for the duration of the burning activities. No fires will be left unattended. ▪ Burning or smouldering matter will not be placed where it may cause a fire to spread. ▪ Flammable materials such as leaves, brush, dead limbs, and fallen trees will be cleared from the area regularly.
Structural Failure	**General Mitigation Measures – Structural Integrity** ▪ *Construction Phase Mitigation Measures* ▫ All culverts and bridges have been designed with hydraulic openings that exceed the minimum MTO Drainage Design Standards to mitigate the risk of potential failures due to extreme weather events, such as flooding. ▫ Engineering controls and monitoring program will be developed to verify that peat consolidation is occurring as predicted, including risk management strategies to reduce potential for fill to cause shear stress. ▫ Qualified environmental inspector(s) will be appointed to guide implementation, monitor, and report on the effectiveness of the construction procedures and mitigation measures.

Potential Accident or Malfunction	Prevention Measures
	▫ An Erosion and Sediment Control Plan will be developed and implemented within the CEMP and OEMP. ▪ *Post-Construction Measures – Operations and Maintenance*. ▫ An Inspection, Maintenance and Repair/Rehabilitation of Road and Supportive Infrastructure Plan will be developed within the OEMP and it will include: - Procedures for periodic inspection and regular maintenance of the Project including the road right-of-way (ROW), road surface, drainage systems, culverts, and bridges. - Procedures for documentation and records for maintenance activities to provide knowledge and information pertaining to maintenance operations, contract controls, expenditures and possible liability action. - Maintenance Quality Standards in general conformance with Ministry of Transportation (MTO) Maintenance Manual (2003). This may include but not limited to: vegetation control, groundcover restoration, road patrol, debris and waste management, inspection/maintenance of rest area and maintenance areas, inspection/maintenance of ditches, culverts, bridges, structure cleaning, removal of obstructions to water flow at bridges/culverts, additional erosion control measures, monitoring/removing ice jamming at bridges, signs, fencing, guide rails, winter maintenance level of service, operations and resources. - Annual inspections in accordance with MTO Maintenance Quality Standards for culverts and bridges will be conducted to identify any defects and action plan, where applicable and where a structural integrity or safety issue is suspected. - Project components will be inspected and repaired as required following a flooding event or vehicle collision. - Operational monitoring and maintenance procedures will be implemented for waterbody crossing structures. - Road patrols and inspection of the road will occur with their frequency being adjusted to address specific situations such as during spring break-up, during and after heavy wind or rain events, and emergencies (e.g., accidents, fires, stranded motorists, wildlife mortality from collision with vehicles). - Erosion and sediment control measures will be inspected by the Proponent's Contractor on a regular basis and after every major rain or spring melt event; and necessary repairs will be made immediately after deficiencies are identified. Inspections will be confirmed by the Proponents, including opportunities for Indigenous Monitors to participate in the monitoring program. - Design the Project in accordance with Ontario highway codes and standards. . ▫ Implement erosion protection and sediment control as required.
Vehicle or Equipment Accidents	**Construction Phase Mitigation Measures** ▪ A construction Traffic Management Plan will be developed as a part of the CEMP to manage traffic and mitigate impacts created by construction traffic. **Post-Construction Measures – Operations and Maintenance** ▪ During the operations phase, safety incidents relating to the Project will be recorded and monitored such as traffic collisions, emergency transport calls, and damages/faults to the road that can result in injury or death. These records will be used to identify hazards and implement mitigation measures (e.g., placing more road signs, reducing speed limits, increasing safety patrols along roads, adding barriers to deter wildlife from crossing or using the road). Traffic data (number of vehicles on the road, number of traffic incidents, number of vehicle-wildlife interactions, locations of traffic incidents, etc.) will be collected to determine the efficacy of mitigation measures after being implemented. ▪ Road patrols and inspection of the road will occur with their frequency being adjusted to address specific situations such as during spring break-up, during and after heavy wind or rain events, and emergencies (e.g., accidents, fires, stranded motorists, wildlife mortality from collision with vehicles).

Potential Accident or Malfunction	Prevention Measures
	▪ Project managers and site supervisors will review hazard and incident reports daily and will as necessary update the Health and Safety Plan and/or Traffic Management Plan to prevent the incident from re-occurring or reduce the likelihood reoccurrence (e.g., updating personal protective equipment requirements). ▪ Signage or reduced speed limits will be considered for implementation over bridges to reduce the risk of vehicle accidents. **Supportive Measures** ▪ Partnerships with Kiikenomaga Kikenjigewen Employment & Training Services (KKETs) will be considered where capacity and resources are available to offer driver's education and licensing to community members interested in improving safety and overcoming related barriers. ▪ The CEMP and OEMP will include a Health and Safety Plan and training program. ▪ Drivers accessing the construction site will be trained in safe driving procedures and will be required to adhere to strict driving safety precautions (e.g., defensive driving training, speed limit adherence) as per the Construction Traffic Management Plan that will be developed and implemented for the Project. ▪ The transport and handling of any hazardous materials will comply with the *Transportation of Dangerous Goods Act*. ▪ All machinery and heavy equipment will be regularly maintained according to manufacturer and mechanic recommendations.

5. Accidents and Malfunctions Response Plan

This section establishes the framework for responding to accidents and malfunctions associated with the Project to ensure a timely, coordinated, and effective response to incidents with the potential to cause adverse effects. It outlines the procedures, roles and responsibilities, and communication protocols to be implemented, including immediate actions, notification requirements, containment and mitigation measures, and follow-up reporting. The response measures are designed to protect human health and safety, minimize environmental impacts, and maintain Project infrastructure integrity, and are supported by integration with other Project management plans, trained personnel, and appropriate response equipment and resources.

Table 3: Accidents and Malfunctions – Response Measures

Accident or Malfunction Event	Response Measures
Spills of Hazardous Materials	**Emergency Response Plan** ▪ The Contractor shall ensure that due care and caution is taken to prevent spills, at all times. ▪ The Contractor shall designate a qualified supervisor(s) as the on-site emergency response coordinator(s). The emergency response coordinator(s) shall have the authority to redirect manpower and equipment in order to respond in the event of a spill. ▪ All personnel responsible for the handling of dangerous goods and hazardous wastes shall be familiar with the on-site response and containment plan. ▪ An updated list of key contacts and telephone numbers for reporting spills, problems, etc., shall be kept on-site at all times. ▪ A Workplace Hazardous Materials Information System (WHMIS) file shall be maintained on-site for all hazardous materials at the work area. Prior to commencement of the work, Material Safety Data Sheets (MSDS) shall be submitted to Proponent's Environmental Manager for all hazardous materials to be used on-site. No material shall be brought to the site without prior submission of a MSDS. ▪ An updated on-site spill response and containment plan for each dangerous good/hazardous waste shall be maintained in the work area at all times. ▪ The designated emergency response coordinator shall periodically review and if necessary revise the on-site response plan. ▪ Appropriate materials for containment and cleanup of any spill of dangerous goods or hazardous wastes shall be available on-site when such materials are present in the work area. Also designated personnel and first responders shall be familiar with the storage location and proper application of such containment and cleanup materials. ▪ *Emergency Kits:* ▫ Spill kits will be deployed to at risk areas within the Project Footprint and on vehicles/equipment, with further detail related to kit types and contents in the Project Spill Contingency Plan. ▫ Rest areas or respite areas along the road will include a maintenance area for spill management materials. ▫ Equipment in construction camps that presents risk of leaks or spill will be protected using appropriate methods (e.g., spill containment systems for oils, fuels and chemical storage and transfer areas, and spill containment systems under stationary equipment, such as generators, pumps and compressors). ▫ Materials required for spill containment and cleanup will be available at all sites where construction related activities occur. ▫ All vehicles hauling fuel will carry materials and equipment for emergency spill containment.

Accident or Malfunction Event	Response Measures
	▫ Emergency spill kits will be available near fuel and hazardous materials handling locations (e.g., spill kits at temporary laydown areas and/or temporary construction camps) and in vehicles. For further details refer to the Spill Prevention Plan for emergency response procedures should the release of contaminants occur on-site.
Fires and Explosions	**Emergency and Risk Response** ▪ In the event that a wildfire occurs an evacuation and emergency preparedness plan will be implemented prior to commencing construction. ▪ The CEMP and OEMP will include plans for Health and Safety, Petrochemical Storage and Handling, and Spill Prevention. ▪ Emergency response management will incorporate an evacuation protocol that includes: ▫ Emergency escape routes, assembly points and shelter areas; ▫ Emergency procedures to manage incidents including the use of fire suppression; ▫ Emergency response training for facility employees; ▫ Contact information for facility emergency responders and other individuals who must be notified of an emergency situation; ▫ Contact information for external emergency responders; ▫ Protocol to handle petrochemical spills and emergency situations; ▫ Facility data and contact information for external emergency responders and support agencies such as ambulance and police; ▫ Information about chemical hazards and safety data sheets; ▫ Site map (or site plan); ▫ Maintain on-site fire suppression equipment when working under high fire hazards; ▫ Establish procedures to close the road due to proximity to wildfires; ▫ Establish a blast zone and safety zone for worker safety; ▫ Obtain all necessary permits and comply with the laws, rules and regulations of Ontario and federal agencies in connection with the use, transportation, storage, and safe handling of all explosives, the federal Explosives Act and the Explosives Regulations; ▫ Post warning signs and have recognizable audible warning signals for blast activities; ▫ Use of blast mats, soil, or other similar material to cover blast area to prevent fly rock; and ▫ Contractor and blaster will inspect blast areas before construction crews enter to continue work.
Structural Failure	**Flooding Event (e.g., overtopping, culvert/bridge failure, embankment washout)** ▪ Immediate Actions ▫ Stop work and close affected roadway or isolate area; ▫ Establish exclusion zones and ensure worker and public safety; and ▫ Identify source of flooding (e.g., blocked culvert, overtopping, drainage failure). ▪ Containment and Control ▫ Implement temporary water diversion measures (e.g., bypass channels, pumping); ▫ Remove debris/blockages from culverts or drainage structures, where safe; and ▫ Install temporary erosion protection (e.g., riprap, sandbags). ▪ Notification ▫ Notify Environmental Monitor, Construction Manager, and Community Relations Lead; ▫ Initiate regulatory and IAAC notifications, if flooding may cause adverse effects; and ▫ Coordinate communication with Indigenous communities, as required.

Accident or Malfunction Event	Response Measures
	▪ Remediation and Repair ▫ Engage hydraulic/geotechnical engineers to assess damage and stability; ▫ Repair or replace damaged structures (e.g., culverts, embankments) to design standards; and ▫ Reinforce drainage capacity and erosion protection, as needed. ▪ Monitoring and Follow-Up ▫ Inspect structures during and after freshet and storm events; and ▫ Document incident and incorporate lessons learned into design and maintenance practices. **Sediment Discharge (e.g., embankment failure causing sediment release to watercourse)** ▪ Immediate Actions ▫ Stop work and stabilize the affected area; and ▫ Delineate the impacted area and prevent further disturbance. ▪ Containment and Control ▫ Install sediment control measures (e.g., silt curtains, sediment fences, straw bales); ▫ Divert runoff away from exposed soils and failed slopes; and ▫ Stabilize exposed surfaces using temporary cover or armouring. ▪ Notification ▫ Notify Environmental Monitor immediately; ▫ Report to regulatory authorities where discharge to watercourses has occurred; and ▫ Support Indigenous notification and communication, as required. ▪ Remediation and Restoration ▫ Remove deposited sediment where required and feasible; ▫ Restore affected banks, beds, and habitats using approved stabilization techniques (e.g., riprap, bioengineering, revegetation); and ▫ Reinstate erosion and sediment control systems. ▪ Monitoring and Follow-Up ▫ Monitor water quality (e.g., turbidity) and site stability; ▫ Inspect repaired areas regularly until vegetation is re-established; and ▫ Update inspection frequency and erosion control measures to prevent recurrence. **Hazardous Material Spill (e.g., fuel or oil release due to structural failure of containment or infrastructure)** ▪ Refer to the section with response measures for spills of hazardous materials in this table.
Vehicle or Equipment Accidents	**Emergency Preparedness and Response** ▪ A Health and Safety Plan will be developed for both construction and operation phases in compliance with the Ontario *Occupational Health and Safety Act* and will include identification of potential hazards and associated risks, training requirements, incident reporting procedures and frequency, and incident and emergency management plans (e.g., for floods, fires, or medical events). ▪ All machinery and heavy equipment will be regularly maintained according to manufacturer and mechanic recommendations. ▪ In the event of a vehicle or equipment accident, the following actions will be taken: ▫ **Immediate Actions** - Stop work and secure the area. - Provide first aid and contact emergency services, as required. - Implement site control (traffic control, exclusion zones). - Shut down involved vehicles/equipment, where safe.

Accident or Malfunction Event	Response Measures
	▫ **Incident Assessment and Control** - Assess injuries, damage, fire risk, and potential environmental effects; - Stabilize vehicles/equipment to prevent movement or escalation; and - Identify and control secondary hazards (e.g., fire, debris, spills). ▫ **Containment and Environmental Protection** - Activate spill response procedures, if required; - Deploy containment measures (e.g., absorbents, booms, berms); and - Prevent contamination of soil, watercourses, and drainage features. ▫ **Communication and Notification** - Notify Construction Manager, Environmental Lead, and Health & Safety Manager; - Initiate regulatory and IAAC notifications, as applicable; and - Support communication with Indigenous communities and authorities. ▫ **Emergency Response Coordination** - Coordinate with police, fire, and medical services, as required; - Provide safe site access and communicate site hazards; and - Support evacuation procedures, where necessary. ▫ **Recovery and Remediation** - Remove damaged vehicles/equipment once safe; - Clean up and remediate contaminated areas; and - Restore site conditions prior to resuming work. ▫ **Investigation and Corrective Actions** - Document incident details and response actions; - Support investigation and identify root causes; and - Implement corrective measures and reinforce training. ▫ **Monitoring and Follow-Up** - Inspect site to confirm safety and environmental risks are addressed; - Verify effectiveness of cleanup and restoration; and - Incorporate lessons learned into procedures and plan updates.

6. Notification and Reporting

6.1 Immediate Actions

Prompt and effective action is essential to minimize risks to human health, the environment, Indigenous use of land and resources, and Project infrastructure following an accident or malfunction.

In the event of an accident or malfunction with potential adverse federal effects, the Proponent will:

- Immediately implement response measures, including but not limited to secure the site, protect personnel, control the source of the incident, and initiate containment and mitigation (refer to **Table 3**). These actions are intended to stabilize the situation, prevent escalation, and enable timely coordination with emergency responders, regulatory authorities, and other relevant parties.
- Notify relevant emergency and environmental authorities as soon as feasible.

A list of contact information for notifications is provided in Attachment 1.

6.2 Notifications

Timely and effective notification is a critical component of accident and malfunction response and supports regulatory compliance, transparency, and coordination with affected parties. Notifications are intended to ensure that appropriate response measures are coordinated promptly, affected parties are informed, and regulatory obligations are met in accordance with applicable approval conditions.

The Proponent will notify:

- Webequie First Nation and other Indigenous communities;
- Relevant provincial authorities; and
- IAAC in writing within **48 hours**.

Notification will include:

- Date, time, and location;
- Description of the incident;
- Substances and estimated quantities released; and
- Authorities notified.

A list of contact information for notifications is provided in Attachment 1.

6.3 Follow-Up and Reporting

Follow-up reporting ensures that adverse effects are appropriately assessed and mitigated, lessons learned are incorporated into Project practices, and commitments under applicable approval conditions are fulfilled.

A written report will be submitted to IAAC within **60 days**, including:

- Detailed incident description;
- Mitigation measures taken;
- Input from Indigenous groups and authorities;
- Residual effects and additional mitigation;
- Measures to prevent recurrence; and
- Implementation details of this Plan.

7. Plan Maintenance

This AMPRP is a living document and will be maintained and updated throughout applicable phases of the Project to ensure it remains current, effective, and aligned with Project activities, regulatory requirements, and consultation outcomes. The Plan will be reviewed periodically and revised, as necessary, to reflect changes in Project design, construction methods, environmental conditions, regulatory requirements, or lessons learned from inspections, drills, incidents, or engagement and consultation with Indigenous communities and relevant authorities. Updates to the AMPRP will be implemented in accordance with applicable approval conditions and communicated to consulted parties within required timelines.

This AMPRP will be:

- Maintained and updated throughout construction;
- Revised as required based on consultation, incidents, or Project changes; and
- Submitted to IAAC and consulted parties within **30 days** of any update.

8. Integration with Other Management Plans

This AMPRP is implemented as part of the Project's integrated environmental and safety management framework. The AMPRP is aligned with and supported by other Project's management plans that collectively establish prevention, preparedness, response, and mitigation measures. Coordination among these plans ensures a consistent, efficient, and effective approach to managing risks associated with accidents and malfunctions, while avoiding duplication and ensuring clear roles, responsibilities, and lines of communication across Project activities.

This Plan is implemented in coordination with:

- Construction Environmental Management Plan (CEMP);
- Operational Environmental Management Plan (OEMP);
- Spill Prevention Plan;
- Traffic Management Plan; and
- Health and Safety Plan.

ATTACHMENT 1

Contact List

Contact List

Contact	Contact Information
Environmental Director	Craig Wallace, AtkinsRéalis Inc. craig.wallace@atkinsrealis.com
Community Relations Lead	Lesley Williams, Indigenous Community Engagement Lesley.williams@indigenousengagement.ca
Construction Manager	Larry George, LH North 4 Cooper Rd., Rosslyn, ON P7K 0E3 P: (807) 623-2798 | F: (807) 623-0421 larry@lhnorth.com
Impact Assessment Agency of Canada	webequie@iaac-aeic.gc.ca
Webequie Supply Road Emergency First Response Coordinator	TBD
Webequie Nursing Station	(807) 353-7241.
Webequie Volunteer Fire Department	Webequie Band Office Band Office Phone: 807-353-6531 Band Office Fax: 807-353-1218 Email: info@webequie.ca
Health and Safety Manager	TBD
Police (Nishnawabe Aski Police Services)	25 Airport Road, BOX 698 Sioux Lookout, Ontario P8T 1B1 Tel: (807) 737-4045 Fax: (807) 737-7331 Toll Free: (888) 396-6277 (NAPS) E-Mail: northwesthq@naps.ca
Ministry of Environment Conservation and Parks – Thunder Bay, Ontario	1-807-475-1205
Ministry of Environment Conservation and Parks – Spills Action Centre	1-800-268-6060
Ontario Poison Centre	1-800-268-9017
Forest Fire Ontario – Ministry of Natural Resources	Wildfires (including grass, brush and forest fires) call 310-FIRE (3473)
Ontario Ministry of Labour	Contact Centre at 1-877-202-0008

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