



Heidelberg Materials North America

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Via Email: laura.friend@nrcb.ca

Natural Resource Conservation Board
4th Floor, Sterling Place
9940 – 106 Street
Edmonton, AB T5K 2N2

Attention: Laura Friend
Manager, Board Reviews

Subject: **Heidelberg Materials Canada Limited
Scott Pit Project
Comments on Proposed Application Requirements**

Heidelberg Materials Canada Limited (Heidelberg) is writing to provide comments to the NRCB on the proposed application requirements for the Scott Pit Project.

Heidelberg recognizes that the NRCB's mandate is to review the potential environmental, economic, and social impacts of the Scott Pit Project to determine whether approving the project is in the public interest of Alberta.

Clear and comprehensive application requirements allow the Board and the public to understand and evaluate the projects impacts and benefits.

With these objectives in mind, Heidelberg provides the following comments on the proposed application requirements for the Board's consideration.

Terminology

Heidelberg notes that the specific wording of the Proposed Application Requirements (PAR) is important as it sets the terms for the application including the scope of the information required for assessment of the project. We reviewed the wording for consistency and offer the following observations. Throughout the document the terms effect(s) and impact(s) are used in an interchangeable manner. Our understanding is that standard assessment methodology examines the effects of a proposed activity and, if those effects create a significant negative impact, the

proponent proposes activities in the form of avoidance, or mitigation. We suggest that the application requirements use the term effects instead of impacts where appropriate.

On Page 1 within the second paragraph of the “Purpose and Scope of the Application Requirements” section, there is reference to the final submission being based upon “issues raised during the public consultations”. We suggest “public consultations” should be expanded to read “public and indigenous consultations” to align with Section 1 of the proposed content requirements.

Project Background

Heidelberg can confirm that the description of the Scott Project, as described in the Project Background section, is correct and an accurate representation of the Scott Project with one exception noted as follows.

The PAR notes that: “The extraction site contains an estimated 50M tonnes of sand and gravel, which is proposed to be mined at 2M tonnes per year over a 25 – 30 year period”. In order to avoid confusion, we can confirm that the 50M tonnes refers to saleable tonnes and the 2M tonnes per year is pit run transported to our Spyhill operations.

Confidential Financial Information

There are references in the PAR requiring Heidelberg to provide financial information relating to capital and operating costs, product pricing, and related financial information. Some of the information requested may be of a confidential nature. Heidelberg is aware of the provisions in the NRCB’s rules of practice with respect to the process for having confidential information protected and will utilize the rules for that process where appropriate.

Please feel free to contact us if you require any additional information or clarification.

Regards,



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