

Omera Shells Inc.
65 Morgan Street,
Richibucto, N.B.

SUBJECT:

Transportation of waste shells from out of province - Nova Scotia, P.E.I., Gasper and Newfoundland Species (Lobster, Snow Crab, Rock Crab and Shrimps)

REGISTRATION OF UNDERTAKING:

(i) Name of Undertaking:

Omer Gaudet, President of Omera Shells Inc.

(ii) Project Overview :

TYPE of Industry – Primary processing of crustacean shells of Atlantic Canada as a raw material to export markets mainly sold in Asia to manufacture chitin products. Omera Shells Inc. will secure largest quantities of this product from committed lobster processors of Atlantic Provinces in order to be environmentally sustainable, measurable and economically viable long terms. Our drying-systems that include: the environmental-friendly designed of the air pollution controls , the dryer system / dust cyclone / odour scrubber- as a combination unit to meet the emissions and requirements standards to-date by the United Nation. These combined units are manufactured as environmentally friendly machines, also designed to meet the Department of Environmental and Local Government Impact Assessment of Canada and New Brunswick; Federal regulatory CFIA and all other Provincial Regulations & Guildlines; Action Plan ... the project also plans to use New Brunswick local processing technologies and machines to process respective dry-shells size-reductions, besides dry shells' moisture contents ranged from 4% to 13% respectively and are requested by customers' specifics and satisfactions. These specifications are preventing any possible biological deteriorations and making compacted-volumes inside containers at sea.... Economically, this product is sought internationally known as a Niche Product (processed from the nature of things) of New Brunswick from Atlantic Canada. This product has been sold to buyers in China during the course of last 35 Years, as the Chitin Development of China.

Overview: I am confident and capable of making a better environment and better economy for New Brunswick.

Purposes

After the overall view ...with all environmental measures are in all considerations, the Undertaker purposely looks at a widest ranges of how he can undertake this project to be more sustainable and economical to move forward...

The following

- (1) Environmental Waste-Shells Treatment from Storage and transportation In & Out of province
- (2) Environmental Waste-Shells Treatment from Enclosed Indoor-Storage; Sanitation and Discharge Acceptation;
- (3) Environmental Waste-Shells Treatment from U.S. made, Mechanical Innovations.

Thereafter

(4) The Undertaker will then to consider to increase shells' volumes, increase market potentials, benefit to communities, promote job creation, develop economy and improving other issues for The Province of New Brunswick by enlarge..

Facts of the Undertaking:

(1) Waste-Shells Transportation of In & Out-of-Province:

This Undertaking is: Environmental-Logistics, present & future Improvement & Commitments

From the supply sources of fish processors,all waste-shells are stored either in the:

- (1) Plastic fish-totes with a bottom drain hole to discharge any secondary excessive fluids and water into their regulated sewage system in their own facilities and then sealed or
- (2) Conveyed out into an outside approved water-tight truck / trailer, when waste shells are being delivered by this conveyor belt, during the length of delivery, time and vibration on conveyor belt, any secondary excessive fluids and water will be discarded on this delivery.

These waste-shells treatment are either in:

- (1) Original processed pieces or
- (2) Crushed cut pieces. No matter in what forms, these waste-shells would not be mixed with any for eign species or materials and no additions of excessive fluids or waste water are indefinitely allowed by the management of all parties, also the usage of waste-shells.

These orders are managerial to meet our - first environmental logistics seriously at all times.

**SPECIAL LONG-HAUL BOXES * SPFOR WASTE-SHELLS WITH 3 INCHES-EDGE
D AT BOTTOM GATE, NO LEAKS
COVERS ARE USED ON TOP OF EVERY TRAILORS, BEFORE TAKE-OFFs -**

as second environmental-logistics

LOAD OF CRUSH WASTE-SHELLS IS AROUND 36,000 LBS AND NO OVERLOAD -

as third environmental-logistics

STRICT ENVIRONMENTAL CONTROLS for IN & OUT-of-PROVINCE

TRANSPORTATION & STORAGE>

The Undertaker has decided for all In & Out-of-Province Transportation and supervised for two(2) staff:

(1) In-House Supervisor for Fleet

(2) Contracted Transport Fleet Manager in a small Surveillance Camera on the spot. The team is and would be supervising with records and communication to ensure " OUR STEPS OF ENVIRONMENTAL-LOGISTICS" in transportation are re-enforced and met in full compliances at all times..

Environmental Waste-Shells Treatment from Enclosed-Indoor-Storage; Sanitation and Discharge Acceptation:

These Undertakings are focused on: Managerial / Physical & Health Environmental Measures / Biochemical / Productive / Methodical / Utilization & Compliances - Points of Management & Consistencies

Plan 1. Enclosed Indoor-Storage with automatic operating-doors shut at all times other than loadings, Waste-Shells stored on concrete-infrastructure and have daily-sanitation-measures.

Plan 2. Separated Piles for Waste Lobster Shells, Waste Snow Crab Shells, Cold Water Shrimp Shells, Rock Crab Shells

(to prevent unnecessary contamination as different species)

Plans 1 & 2 are our, fourth environmental logistics & management.

Plan 3. Controlled Waste-Shells' Rotations for Production- Not more than 8 hours or less.

Plan 4. A Contingency Temperature-Control Storage-Room of Waste-Shells as, Back-up Plan for our, fifth environmental impact & mitigation.

Plan 5. Regular Daily Cleanings & Sanitations and End-of-Day Sanitation would be carried out in accordance with Environmental Health

regulations. Proper Chemical Agent—"Pinosan" would be supervised and used daily.

Plan 6. After detailed consultations of our Water-Usage, our Water Quality & Quantity under the Guildlines for Wastewater-Treatment.

A Final Approval from New Brunswick Department of Environment and Local Government for the allowable 1500 Gallons per Day of

Cleaning-Sanitation Water and Scrubber-Effluent to be discharged into their WWTP.

Environmental Waste-Shells Treatment from U.S.

The U.S. Technologies are based on: Innovative Environmental-friendly: Rotary Dryer, Dust Collector Cyclone, Wet Odour Scrubber- Aim to North America Air-Quality & Wastewater Standards.

Under the serious reviews of environmental assessment, especially in the issues of impacts and mitigations, the project has innovated to spend the highest capitals on U.S. Technologies to acquire "A Combination of Drying-Systems (ie. A Whole Unit) obtained with Highest Capacities and Capabilities, made by Tarmac International Inc. M.O. USA", is designed to process waste-shells in vast volumes in peak months and weeks, with assessed efficiencies to mitigate in contingencies and alternatives from any other relevant issues may happen? Operation & Maintenance will be running in shift works, 24 hours/day and 7 days/week according to the seasons, the waste-shells assembly-line from the enclosed indoor-storage to the drying-systems in whole is environmentally assessed to produce 5 metric tons/hour (2.7 lbs. /second) of dry shells in speeds, the dusts are being intercepted by the dust-collector-cyclone located downstream from the dryer, the dust-collector is uniquely with adjustable lined-throat-opening made for variable particle-collection efficiency, a carbon steel ductwork is connecting dryer to dust-cyclone and then to Venturi vertical wet scrubber, which includes inlet hot gas duct, outlet duct, multiple water injection nozzles to permeate hot vapor into liquid form.

The combination of drying-systems are uniquely under one computer-panel in total control.
As our seventh environmental assessment plan.

For references: The systems are engineered by Tarmac International Inc., Address: P.O.Box
LEES SUMMIT, MO, USA 64063

www.tarmac.com contact person-Richard Klein (816)220-0700, after his many months of data
research from the shells' industry, biology, chemical engineering and Air & Water Standards &
Regulations in New Brunswick and Canada etc. Richard Klein of Tarmac has the assurances
and warranty to this environmental development. He is assured: The outputs of dry-shells will
be overwhelmingly more than the inputs of waste-shells under our total control, capable of
processing between 36,000,000lbs to 50,000,000lbs, maximized by the whole year calculation.

As our eighth environmental impact assessment.

This project will also install many security cameras on sites- check and record operation and
technical scenes.

As our ninth environmental security.

Hard hats will be worn in the processing areas; protective clothing and protective-wears: of eye,
ear, nose/mouth are emphasized and first-aids are readily available at all times; employees'
hygiene is a must to maintain proper physical and mental health. These are all measures of the
Department of Labour, and Health to maintain a Physical Work-Safe and an Environmental
Health-Safe project.

Initially, the number of Inbound employees are: 10 to 22: 4 Management. Operating 3 Shifts
per Day- Every Shift: They are 1 Management+ 1 Supervisor cum Foreman / 3 in Forklifts /
1 Warehouse / 3 Packaging;
Outbound drivers (Contracted Transportation Company) are: 9 to 10 for Five Areas and 1 Feet
Manager: (1) Gaspe Coast, 4 trucks and trailers, one pick-up per day (2) Nova-Scotia
Cheticamp, 2 trucks and trailers, one pick-up everyday (3) Local A, Incorporated Shippagan,
Tracadie, and Neguc, 1 truck and trailer performing two trips a day (4) Local B, Incorporated
Cap-Pele, Shediac, and Grand Digue. One truck and trailer performing two trips per day (5)
Local C, Covered Cap Pele, Bedec, Lumiere, Escumenac, and Pointe Sapin. One two and
trailer performing two trips a day. Newfoundland 3 to 4 pick up daily when needed this product
is frozen and will be transported by refrigerated container's. Noting that with the sizes of this
feet, the business will allow for a small office to be placed on site to coordinate the
environmental logistics and environmental surveillances of transportation are seriously met.

As environmental management.

Facility's routine activities are at least a minimum of 1 Management plus 1 Supervisor cum
Foreman in every shift; proper Company's Culture will be briefed regularly, most importantly,
environmental control equipment, environmental health education, environmental fire-safety,
mechanical / electrical safety, workplace safety and including all anticipated routine
maintenance requirements and activities and their timing are checked, recorded and
communicated as well. Estimated daily usages cleaning water and "Pinosan" for cleaning/
disinfection/ sanitization & deodorization will be stocked and supervised.

As environmental education.

Ultimately, operator assigned to check regularly the required standards of air emission from the wet odour scrubber effluent discharge-quality would be part of job description, they are regulated and recorded at all times, as measures in our log books. (Q M P) On the other hand, operators for the rotary dryer are well trained, informed and communication networks (posted on sites and recorded in cellular phones) are opened 24/7, all questions and answers of team leaders know US Tarmac's emergency and government emergency hotlines? Various motors & pumps, pipes' & machineries' connections for conveying water or shell are always to be sure operating properly. We want to minimize the level of noise pollution, these environmental measures can be achieved by regular repairs & maintenance, these would enhance human resource and machineries' efficiencies.

As environmental mitigation.

The Needs of Undertaking:

The Need of International Export from Richibucto, New Brunswick:

Starting from the marketing points of views, majority of the international market potentials and future product development are presently in China, from which they have been maintaining at about GDP of 7.4%(with variances +- 0.3) and the market of Chinese Yuen (RMB) has been on the scale of +-3% over the last 3 years. In 2015 RMB has come the 4th World Trading Currency (overcome Cdn. and Austr.) right after Japan, Pound, Euro and USD at the best.

Chitin buyers in China are still looking for more supplies of dry shells from all over Southeast Asia countries and becoming very much interested in our crustacean shells from Atlantic Canada, because of the highest in chitin contents from our coldest Atlantic Ocean, as well from the abandonment of discarded shells from the history of processing methods in North America.

In New Brunswick, this project is unknown to most peoples, due to their lacking of knowledge in the chitin market overseas; secondly, the "no-doings" and "no-innovating" in storage, transportation, logistics, innovative equipment and expensive capitals. Thirdly, they are also "do-nothings" on shells' waste-smell and their own negativity on policies.

This project will be distinguished from other innovations also, as remedy to many crustacean processors in New Brunswick and Atlantic processors to their disposal of shells' wastes' costs in questions and answers. The market potential, benefits to society, economic benefits. Job creation benefits, international demands and other relevant positive issue in our mind would make the development of this project sustainable, viable and desirable for the Richibucto Rexton and New Brunswick.

Siting Considerations:

The Morgan straddles the north of Richibucto town. The site is very accessible in the middle of Highway 11, Exit 57 and ending north of Richibucto. Ending north of Main Street into Morgan Street(Route 134), and ending north of Morgan Street. (ie. At the very very end of Town).

To the north and west are large, underdeveloped tracts of thick woodland as buffers.

About 10 years ago, site was commercially ran as a food processing facility, were equipped with excellent civil structures as stand, roadway and car park around the building and Morgan Street is ending to the driveway of the property it provided very good bases for the renovations of other works needed to be done.

The site's landscape is flat, with virtually no slope in any directions. The site lies over 3,000 ft on the estuary of Richibucto River, which empties into Northumberland Strait. However, the site is well above sea level and does not experience flooding. Because it was commercially landscaped prior, surface water run-off is drained by the existing sewage and permeable into surrounding ground on site. No ponding is found on site.

The overburden is deep, consisting of sand/ a lot of gravels/ clay aggregate. The overburden poses no site restrictions and is considered well suitable for dry shells' development.

The site is well treed with the forest canopy largely intact on northerly west. The predominant species are spruce and poplar. The forest is estimated around 70 years of age. Therefore the site has surrounded dense tree cover, idea for screening and buffers on land

The site considerations are with a lot of distinct environmental advantages, because of it's existing environment, engineering and history.

The main SteelBuilding is situated in the midst, surrounded by accessible road and front parking. The siting is 37 acres and was considered desirable to fit into our considerations in development, in view of the requirements of dry shells operation and the Proposal of Morgan commercial property and it's areas(Existing) is in the proceedings

The Steel-Building is structurally sound and firmly erected: A size of 30,000 square-feet with a 20 feet ceiling height, paved driveway is in the front to car parks , left and right of building are with loading docks and doors, also with a lot of accessibility to the back of building. Steel fences and security-gate with camera will be erected and installed; the site is most suitable.

The property is surrounded by thick wooded-trees on the North, West and South sides.

IN CONCLUSION:

Good Management with Excellent Machineries and with all Contingency / Mitigation Plans in place would assure the possibilities of mistakes or mishaps in the ongoing operation can be minimized and controlled in this project by the Undertaker and his Team!

Environmental & Fire Protection Plans and Management Contact Information and Locations of Fire Extinguishers are in place by posting all Environmental Contact Information in the visible operating area; Contingency Plan of Mitigation in Operation & Maintenance (the worst case scenario) will be told, trained and posted;

Buffer Zones and Sensitive Areas of the existing property will be untouched;

Pollution Control Equipment installed and will be installed in the proceeds of this project in consultations and

Complete Understandings of Drying-System Control Panel are in the Training Plan;

Noise and Vibration Reduction Plans installed and are in the Routine Repair & Maintenance Plan;

Site specific Environmental Studies and Tests are in the proceeds of this development by various Department and Specialists;

Monitoring Plans aimed at predicted impacts and consulting the Effectiveness of Mitigation Measures;

Environmental Protection Plans in place and consulting the all the Standards Environmental Compliances;

Uses all the Government Expertise in this development

Uses all Certified Equipment and Certified Professionals;

Training Plans in place for local and provincial employment;

Community Involvement is in the proceeds of development;

Local Government is informed in the proceeds of this development.

6.0 PUBLIC INVOLVEMENT

Town of Richibucto, Mayor, Administrator and Councilors and general public met

7.0 APPROVAL OF THE UNDERTAKING

NEW BRUNSWICK(I-8657),

APPROVAL TO CONSTRUCT AND OPERATE,

Pursant to paragraph5(3)(a) of Air Quality Clean Air Act, Source Classification-Air Quality Regulation Class 2, to OMER A SHELLS INC. for the construction and operation of the SHELL PROCESSING FACILITY,
Issued by: For- The Minister of Environment and Local Government.
3,Omara Shells Inc. Is already Approved by environment for the production of Waste-Shells in New-Brunswick this demand is for bringing in Shells from Nova-Scotia , P.E.I., Gasper and Newfoundland.

Thank you for your time, consideration and attention to the project

Omara Shells Inc. 65 Morgan Street Richibucto N.B.E4W-3B8

Contact : President Omer Gaudet -506-531-0628

Contact : C.E.O. John Cormier -506-212-0093

