Fording River Extension Project

Revised Detailed Project Description

August 2025

A GLENCORE COMPANY

Report History

Version	Date	Edited by	Comments
Rev0	July 2025	EVR Operations Limited	Original Revised Detailed Project Description submission
Rev1	August 2025	EVR Operations Limited	Updated based on comments received on the July 2025 Revised Detailed Project Description

Abbreviations

Abbreviations	Definition
ABMP	Area-Based Management Plan
ANFO	ammonium nitrate/fuel oil
AOA	archaeological overview assessment
ATV	all-terrain vehicle
AWTF	Active Water Treatment Facility
BC	British Columbia
BC CDC	British Columbia Conservation Data Centre
BC EAA	British Columbia *Environmental Assessment Act*
BC EAO	British Columbia Environmental Assessment Office
BC EMLI	British Columbia Ministry of Energy, Mines and Low Carbon Innovation
BC EP	British Columbia Ministry of Environment and Parks
BC IHA	British Columbia Interior Health Authority
BC MCM	British Columbia Ministry of Mining and Critical Minerals
BC MECCS	British Columbia Ministry of Environment and Climate Change Strategy
BC WLRS	British Columbia Ministry of Water, Land and Resource Stewardship
BC MoF	British Columbia Ministry of Forests
BF-BOF	blast furnace-basic oxygen furnace
BF+CCUS	carbon capture, usage and storage for blast furnaces
C-3 Permit	C-3 Permit issued under the *Mines Act*
CCFR	combined coarse and fine rejects
CCUS	carbon capture, usage and storage
CEAO	Chief Environmental Assessment Officer
CEO	Chief Executive Officer
CO	carbon monoxide
CO_2	carbon dioxide
COSEWIC	Committee on the Status of Endangered Wildlife in Canada
COVID-19	Coronavirus Disease 2019
DNA	deoxyribonucleic acid
DPD	Detailed Project Description
EAF	electric arc furnace
ECCC	Environment and Climate Change Canada
EKWA	East Kootenay Wildlife Association
EMC	Environmental Monitoring Committee
EPIC	British Columbia Environmental Assessment Office Project Information Centre
EOM	End of Mining
EV-CEMF	Elk Valley Cumulative Effects Management Framework
EVFFHC	Elk Valley Fish and Fish Habitat Committee
EVO	Elkview Operations
EVR	EVR Operations Limited
EVWQP	Elk Valley Water Quality Plan

Abbreviations	Definition
FLNRORD	Ministry of Forests, Lands, Natural Resource Operations and Rural Development
FRO	Fording River Operations
FRO-N SRF	Fording River Operations North Saturated Rock Fill
FRO-S-AWTF	Fording River Operations South Active Water Treatment Facility
FRX	Fording River Extension
GBA+	Gender-Based Analysis Plus
GHG	greenhouse gas
GHO	Greenhills Operations
HADD	harmful alteration, disruption or destruction
HSEC&HR	Health, Safety, Environment, Communities and Human Rights
HEG	high elevation grasslands
IAA	*Impact Assessment Act*
IAAC	Impact Assessment Agency of Canada
IFRs	instream flow requirements
IMBA	Impact Management and Benefits Agreement
IPA	Implementation Plan Adjustment
IPD	Initial Project Description
IS/A	Impact Statement/Application
KNC	Ktunaxa Nation Council
LCO	Line Creek Operations
MYAB	Multi-Year Area Based
NO_2	nitrogen dioxide
OGMA	old growth management area
PAG	potentially acid generating
PM	particulate matter
PODs	points of diversion
Project	Fording River Extension Project
Q&A	question and answer
RFHMP	Regional Fish Habitat Management Plan
ROHDS	reverse osmosis high-density sludge
RSBC	Revised Statutes of British Columbia
RWQM	Regional Water Quality Model
SARA	*Species at Risk Act*
SBC	Statutes of British Columbia
SC	Statute of Canada
SDFWA	Sparwood and District Fish and Wildlife Association
SO_2	sulphur dioxide
SOR	Statuary Orders and Regulations
SRF	Saturated Rock Fill
STP	South Tailings Pond
TAG	Technical Advisory Group
Teck	Teck Coal Limited

Abbreviations	Definition
TISG/AIR	Joint Tailored Impact Statement Guidelines/Application Information Requirements
TK	Traditional Knowledge
TLU	Traditional Land Use
TMP	Tributary Management Plan
TRL	Technology Readiness Level
TSF	tailings storage facility
UNDRIP	United Nations Declaration on the Rights of Indigenous Peoples
US	United States of America
VC	valued component
VP	Vice President
WCT	Westslope Cutthroat Trout

Units of Measure

Units	Definition
%	percent
>	greater than
℃	degree Celsius
$	Canadian dollars
Bbcm	billion bank cubic metres
ha	hectare
km	kilometre
km^2	square kilometre
kV	kilovolt
m	metre
m^2	square metre
m^3	cubic metre
m^3/d	cubic metres per day
m/m	metres per metre
masl	metres above sea level
Mbcm	million bank cubic metres
Mmtcc	million metric tonnes of clean coal
Mmtcc/yr	million metric tonnes of clean coal per year
mtcc	clean coal tonnages
M t/yr	million tonnes per year
t	tonne
t/d	tonnes per day
t/yr	tonnes per year
t CO_2e/yr	tonnes carbon dioxide equivalent per year

Detailed Project Description Preparation and Credits

Professionals, reviewers, and authors with primary responsibility for preparing this Revised Detailed Project Description are listed below.

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Table of Contents

1.0 Introduction 1
1.1 Purpose of the Revised Detailed Project Description 6
1.2 Project History and Status 7
1.2.1 Early Project Development and Exploration Activities 7
1.2.2 Initial Project Description 8
1.2.3 July 2021 Detailed Project Description 9
1.2.4 Readiness Decision and the Revised Detailed Project Description 9
1.2.5 Engagement on the Revised Detailed Project Description 17
1.3 Company Information 20
1.3.1 Company Overview 20
1.3.2 Company Contact Information 21
1.3.3 Corporate Policies 21

2.0 Project Need and Purpose 23
2.1 The Role of Steelmaking Coal in the Transition to a Low-Carbon Economy 23
2.2 Need for and Purpose of the Project 25

3.0 Alternatives to the Project 26
3.1 Background on No Project and New Mine Scenarios 26
3.2 Engagement on Alternatives to the Project 27
3.2.1 Identification of Alternative and Supplemental Mine Development Areas 28
3.2.2 Collaborative Evaluation of Alternatives 33
3.2.3 Proposed Development Area 38

4.0 Alternative Means of Carrying Out the Project 39
4.1 FRX Pit 40
4.2 Mining Direction and Technique 50
4.3 Mine Rock Storage Areas 51
4.4 Water Quality Source Control and Treatment 58
4.4.1 Water Quality Source Control 59
4.4.2 Water Treatment 61
4.5 Tailings Management 67
4.5.1 Current Practice 67
4.5.2 Development of Project Tailings Strategy 67
4.6 Coal and Mine Rock Handling Alternatives or Decarbonization Technologies 71
4.7 Site Water Management 74
4.8 Support Infrastructure 76
4.9 Reclamation and Closure 78
4.10 Staging of the Project 79
4.11 Resource Project Scope Identified for Assessment 81

5.0 Project Information 83
5.1 Project Overview 83
5.1.1 Project Location 83
5.1.2 Project Footprint 89
5.1.3 Project Summary 93
5.1.4 Project Benefits 94
5.1.5 Project Schedule 96

5.2 Deposit Geology and Resource Characterization 96
5.2.1 Stratigraphy 97
5.2.2 Structure 99
5.2.3 Resource 101
5.2.4 Geological and Geotechnical Constraints on Mine Design 103
5.3 Mine Plan 105
5.3.1 Construction 105
5.3.2 Development of FRX Pit 106
5.3.3 Development of Mine Rock Storage Areas 115
5.3.4 Project Water Management 116
5.3.5 Landform Design 123
5.4 Waste and Emissions 123
5.4.1 Project Waste 123
5.4.2 Greenhouse Gases 124
5.4.3 Other Air Emissions 129
5.5 Public and Environmental Safety 130
5.6 Mine Reclamation and Closure 131
5.7 Water Use 133

6.0 Regulatory Framework 137
6.1 *Environmental Assessment Act* of British Columbia 137
6.2 *Impact Assessment Act* of Canada 138
6.3 Other Federal Approvals 139
6.4 Other Provincial Permits and Approvals Required for the Project 140
6.5 Proposed Assessment Schedule 142
6.6 Relevant Studies, Plans and/or Regional Assessments 143
6.7 Potentially Relevant Agreements 144
6.8 Interactions with Other Existing Approvals 144

7.0 Potentially Affected Indigenous Peoples 145
7.1 Ktunaxa Nation 145
7.1.1 Introduction Provided by Ktunaxa Nation 145
7.1.2 Summary of Engagement with Ktunaxa Nation 147
7.2 Yaq̓it ʔa·knuqƛi ’it 161
7.3 Shuswap Band 170
7.4 Stoney Nakoda Nations 177
7.5 Piikani Nation 182
7.6 Siksika Nation 189
7.7 Kainai (Blood Tribe) 196
7.8 Tsuut’ina Nation 201
7.9 Otipemisiwak Métis Government 205
7.10 Métis Nation British Columbia 209
7.11 Elk Valley Métis Nation 213

8.0 Potentially Affected Public, Government Agencies, Non-Government Organizations and Technical Advisors 219

9.0 Existing Environment 228
9.1 Regional Environmental Context 228
9.1.1 Historical Regional Environmental Context 228
9.1.2 Regional Environmental Studies, Initiatives, Plans and Programs 228

9.1.3 Regional Environmental Challenges 233
9.2 Physical Environment 238
9.3 Biological Environment 239
9.3.1 Ecosystems and Vegetation 240
9.3.2 Wildlife and Wildlife Habitat 241
9.3.3 Fish and Fish Habitat 241
9.3.4 Species at Risk 243
9.3.5 Ecologically Sensitive Areas 246
9.4 Human Environment 253
9.4.1 Social and Economic Conditions 253
9.4.2 Health and Well-Being 266
9.4.3 Archaeological Resources 267
9.5 Land Use Plans 270
9.6 Federal Lands 270

10.0 Potential Project-Related Effects and Mitigations 271
10.1 Identification of Potential Effects and Approach to Developing Mitigations 277
10.1.1 Impacts to Terrestrial Environment 279
10.1.2 Impacts to Aquatic Environment 283
10.1.3 Impacts to Ktunaxa Rights 288
10.1.4 Integration with EVR's Existing Mitigation Programs 293
10.2 Potential Changes to the Environment on Lands Outside BC and Canada and Mitigations 293
10.3 Effects of the Environment on the Project 294

11.0 Closing 296

12.0 References 297
12.1 Acts and Regulations 297
12.2 Literature Cited 299

13.0 Glossary 311

List of Tables

Table 1.2-1: Overview of Yaqaɬ Hankatiɬiɬki na ʔamak Document 18
Table 3.2-1: Alternative and Supplemental Mine Development Areas 28
Table 3.2-2: Evaluation Criteria for Alternative and Supplemental Mine Development Areas 33
Table 3.2-3: Evaluation of Alternative and Supplemental Mine Development Areas through Engagement 34
Table 3.2-4: Evaluation of Alternative and Supplemental Mine Development Areas Against Key Criteria Compared to Castle Mountain 36
Table 4.1-1: Project Pit Shell Evaluation of Alternatives 43
Table 4.2-1: Project Mining Direction and Technique Alternatives 50
Table 4.3-1: Project Mine Rock Storage Location Alternatives 53
Table 4.4-1 Project Water Quality Source Control Alternatives 60
Table 4.4-2 Project Water Quality Treatment Alternatives 65
Table 4.5-1: Project Fine Tailings Alternatives 69
Table 4.6-1: Project Coal and Mine Rock Handling Alternatives 72
Table 4.7-1: Site Water Management Alternatives 74

Table 4.8-1: Project Support Infrastructure Alternatives 76
Table 4.10-1: Project Staging Alternatives 80
Table 4.10-2: Staged Mining Alternatives 81
Table 5.1-1: Project Footprint Refinements Since the Initial Project Description and the July 2021 Detailed Project Description 90
Table 5.1-2: Comparison of Project Footprint Disturbance Areas in the Initial Project Description, July 2021 Detailed Project Description and Revised Detailed Project Description[(a)] 93
Table 5.2-1: Stratigraphy in the Project Mine Area 97
Table 5.3-1: Representative Years of Development 106
Table 5.3-2: Project Mine Rock Storage Distribution 115
Table 5.4-1: Historical Greenhouse Gas Emissions at Fording River Operations 125
Table 5.4-2: Estimated Maximum Annual Project Greenhouse Gas Emissions by Project Phase 126
Table 5.4-3: Estimated Average Greenhouse Gas Emissions during Project Operations with No Additional Mitigation 128
Table 5.7-1: Consumptive Water Uses at Fording River Operations 134
Table 5.7-2: Water Use Specific to the Fording River Extension Project and Fording River Operations Activities Related to the Project 135
Table 6.1-1: Project Footprint Disturbance Areas 138
Table 6.4-1: Summary of Key Provincial Authorizations or Permits Potentially Required for the Project 141
Table 6.5-1: Preliminary Coordinated Assessment, Permitting and Project Milestone Schedule 142
Table 7.1-1: Engagement with Ktunaxa Nation about the Project since Preparation of the Provincial Initial Project Description, April 9, 2020 149
Table 7.1-2: Future Planned Engagement with Ktunaxa Nation Council 161
Table 7.2-1: Engagement with Yaq̓it ʔa·knuqƛi ’it about the Project since Preparation of the Initial Project Description 162
Table 7.2-2: Future Planned Engagement with Yaq̓it ʔa·knuqƛi ’it 170
Table 7.3-1: Engagement with Shuswap Band about the Project since Preparation of the Initial Project Description 172
Table 7.3-2: Planned Engagement with Shuswap Band 176
Table 7.4-1: Engagement with the Stoney Nakoda Nations about the Project since Preparation of the Initial Project Description 178
Table 7.4-2: Planned Engagement with the Stoney Nakoda Nations 181
Table 7.5-1: Engagement with Piikani Nation about the Project 183
Table 7.5-2: Planned Engagement with Piikani Nation 189
Table 7.6-1: Engagement with Siksika Nation about the Project 191
Table 7.6-2: Planned Engagement with Siksika Nation 196
Table 7.7-1: Engagement with Kainai (Blood Tribe) about the Project 197
Table 7.7-2: Planned Engagement with Kainai (Blood Tribe) 201
Table 7.8-1: Engagement with Tsuut’ina Nation about the Project 202
Table 7.8-2: Planned Engagement with Tsuut’ina Nation 204
Table 7.9-1: Engagement with Otipemisiwak Métis Government about the Project 206
Table 7.9-2: Planned Engagement with Otipemisiwak Métis Government 209
Table 7.10-1: Engagement with Métis Nation British Columbia about the Project 211
Table 7.10-2: Planned Engagement with Métis Nation British Columbia 213
Table 7.11-1: Engagement with Elk Valley Métis about the Project 215
Table 7.11-2: Planned Engagement with Elk Valley Métis Nation 218

Table 8-1: Engagement with Potentially Affected Public, Government Agencies, Non-Governmental Organizations and Technical Advisors about the Project since Preparation of the Provincial Initial Project Description 220
Table 9.1-1: Recent Environmental Challenges in the Project Region 234
Table 9.3-1: Conservation Status Definitions 243
Table 9.3-2: Plant Species at Risk Documented within the Project Footprint 244
Table 9.3-3: Wildlife Species at Risk Documented within the Project Vicinity 245
Table 9.4-1: Population, Age and Labour Force Characteristics 254
Table 9.4-2: Archaeological Overview Assessment Polygons and Recorded Archaeological Sites within the Project Footprint and 200 Metre Buffer Zone 268
Table 9.5-1: Land Use Plans and Area-Specific Regulations 270
Table 10-1: Application of the BC Policy for Mitigating Impacts on Environmental Values 275
Table 10.1-1: Potential Extraordinarily Adverse Effects Identified by the Ktunaxa Nation and Plausible Mitigations (Terrestrial Environment) 281
Table 10.1-2: Potential Effects Identified by the Ktunaxa Nation to be Extraordinarily Adverse and Plausible Mitigations (Aquatic Environment) 285
Table 10.1-3: Potential Effects Identified by the Ktunaxa Nation to be Extraordinarily Adverse and Plausible Mitigations (Ktunaxa Rights linked to Terrestrial and Aquatic Impacts) 289
Table 10.1-4: Potential Effects Identified by Ktunaxa Nation to be Extraordinarily Adverse and Plausible Mitigations (Ktunaxa Rights) 291

List of Figures

Figure 1-1: Regional Location of Fording River Operations and the Fording River Extension Project . 4
Figure 1-2: Location of Proposed Fording River Extension Project 5
Figure 3.2-1: Potential Mine Development Areas 32
Figure 4.1-1: FRX Pit Boundary 48
Figure 4.1-2: Comparison Between the Selected Pit Depth and the 2021 Detailed Project Description Pit Depth 49
Figure 4.3-1: Locations of Project Mine Rock Storage Areas 57
Figure 4.4-1: Monitored and Projected Selenium Concentrations at Elk River Downstream of Michel Creek 62
Figure 4.4-2: Water Treatment Facilities to 2027 (Maximum Capacity) 63
Figure 5.1-1: Project Footprint and Existing Fording River Operations 85
Figure 5.1-2: EVR Coal Leases in and Around the Project Footprint 86
Figure 5.1-3: Proximity to Indigenous Reserves, Territories, Treaty Lands and Chartered Communities 87
Figure 5.1-4: Proximity to Federal Lands 88
Figure 5.1-5: Comparison of Initial Project Description and July 2021 Detailed Project Description Footprints 91
Figure 5.1-6: Comparison of Project Footprint with July 2021 Detailed Project Description Footprint ... 92
Figure 5.2-1: Geology Cross-Section at the Project Mine Area Looking North 100
Figure 5.2-2: Stratigraphic Column within the Project Mine Area 102
Figure 5.2-3: Region of Geological and Geotechnical Design Constraints Looking North within the Project Mine Area and Vicinity 104
Figure 5.3-1: Representative Mine Sequence – Starting Surface (Year 0) 108
Figure 5.3-2: Representative Mine Sequence – Years 0 to 4 109
Figure 5.3-3: Representative Mine Sequence – Years 4 to 9 110
Figure 5.3-4: Representative Mine Sequence – Years 9 to 14 111

Figure 5.3-5: Representative Mine Sequence – Years 14 to 24 112
Figure 5.3-6: Representative Mine Sequence – Years 24 to 34 113
Figure 5.3-7: Representative Mine Sequence – Year 34 to End of Mining 114
Figure 5.3-8: Conceptual Water Management Snapshot – Year 4 119
Figure 5.3-9: Conceptual Water Management Snapshot – Year 14 120
Figure 5.3-10: Conceptual Water Management Snapshot – Year 34 121
Figure 5.3-11: Conceptual Water Management Snapshot – End of Mining 122
Figure 9.3-1: Ecologically Sensitive Areas in the Project Vicinity 247
Figure 9.3-2: Ecological Communities at Risk in the Project Vicinity 248
Figure 10-1: EVR's Mitigation Hierarchy 273

List of Appendices

Appendix A: Concordance Table for the Summary of Engagement Received through the Provincial *Environmental Assessment Act* Process
Appendix B: Concordance Table for the Summary of Issues Identified through the Federal *Impact Assessment Act*
Appendix C: Legal Description of Lands to be Used for the Project
Appendix D: Agreements Potentially Relevant to the Assessment Process
Appendix E: Existing Studies and Ongoing Investigations
Appendix F: List of Scientific Names
Appendix G: Plant Species and Ecological Communities at Risk with Potential to Occur in the Project Vicinity
Appendix H: Wildlife Species at Risk with Potential to Occur in the Project Vicinity
Appendix I: Potential Project–Environment Interactions and Mitigations

1.0 Introduction

This document is the Revised Detailed Project Description (DPD) for the EVR Operations Limited (EVR)[1] Fording River Operations (FRO) proposed Fording River Extension Project (FRX Project or the Project) and incorporates refinements to the Project that have been made since submission of the original DPD in July 2021. The FRX Project is being reviewed under the *Impact Assessment Act* SC 2019, c 28, s1 (IAA) of Canada and the *Environmental Assessment Act* SBC 2018, c 51 (BC EAA) of British Columbia (BC). The review is being conducted by the Impact Assessment Agency of Canada (IAAC) and the BC Environmental Assessment Office (BC EAO) in accordance with the Impact Assessment Cooperation Agreement between Canada and British Columbia (the Cooperation Agreement; IAAC 2019).

The proposed FRX Project will extend the life of EVR's existing FRO steelmaking coal mine in the Elk Valley. The Elk Valley, also known as Qukin ʔamakʔis or Raven's Land to the Ktunaxa Nation, is in southeastern BC. The area is the traditional and unceded territory of the Ktunaxa Nation and is known for its coal. The Ktunaxa would carry the coal with them to start their fires as they travelled to different encampments as they followed the seasons in their homeland. Engagement with the Ktunaxa Nation, and other Indigenous Peoples with interests in the land, is a critical part of EVR's work in the Elk Valley and specifically on the Project's design and coordinated assessment. EVR recognizes the importance of responding to feedback provided by potentially affected Indigenous Peoples, interested parties and the public and supports the process to achieve the free, prior and informed consent of potentially affected Indigenous Peoples for its activities.

Two in five of all jobs in Cranbrook, Fernie, Sparwood and Elkford are created or sustained by EVR's activities in the Elk Valley (Deloitte 2022). As an extension to the existing FRO, the Project can extend the benefits from the current operation, including sustaining the livelihood of the approximately 1,500 current FRO employees, as well as contributing to an additional approximately 2,600 direct jobs and 8,000 indirect and induced jobs supported by EVR's operations in the Elk Valley. These benefits also include significant contracting opportunities for local and Indigenous businesses.

The Elk Valley's high-quality steelmaking coal deposits and Ktunaxa Nation's, EVR's and Canada's high standards for stewardship and environmental management give the Project a unique opportunity to meet the continued demand for steelmaking coal as an input into steel used to help construct the transportation, infrastructure and technology of the future, as well as supporting the global low carbon transition.

The Project would be located directly adjacent to and south of the existing FRO (Figure 1-1Figure 1-1 and Figure 1-2Figure 1-2). The Project location allows for a reduced footprint and reduction in new disturbance when compared to alternate resource areas in the region; this, combined with suitable deposits of mineable high-quality steelmaking coal, make it a logical extension of the existing operations. Critical infrastructure from FRO such as the coal processing plant, mining equipment, maintenance facilities, tailings storage and more will be utilized for the Project to minimize new disturbance and create efficiencies.

The Project will build on the knowledge from EVR's existing operations and its Sustainable Development team, incorporating over 50 years of operating knowledge in the Elk Valley. Based on feedback received through engagement and a strong emphasis on sustainability, EVR has introduced innovative strategies aimed at further

[1] Previously Teck Coal Limited (Teck); refer to Section 1.2.1.

reducing new disturbance, protecting valued components (VCs) of the natural and human environment, prioritizing progressive backfilling and reclamation, integrating water quality considerations and more. These efforts contribute to a Project that provides the steelmaking coal the world needs in a socially and environmentally responsible manner and is more compatible with local Indigenous values. Through the design described in this Revised DPD, the FRX Project has the potential to provide similar multi-generational benefits as the current FRO has since opening over 50 years ago in less than a third of the footprint of existing operations.

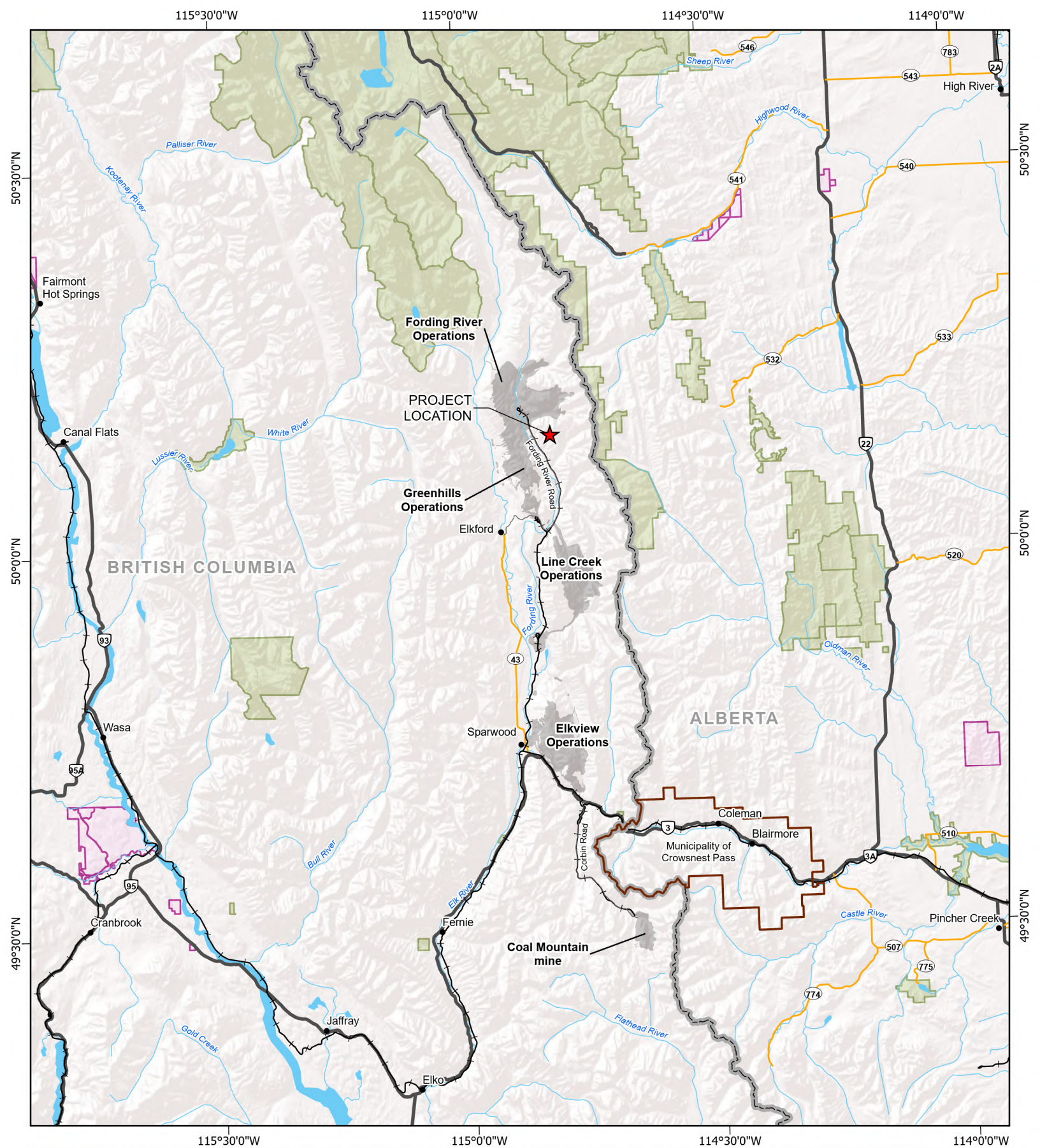
Through engagement with Ktunaxa Nation, and in alignment with the direction provided in the Readiness Decision made by the BC EAO in February 2023, additional work has been undertaken to evaluate alternatives to the Project and alternative means to carry out the Project. Ktunaxa Nation criteria and the FRX Project purpose were used collaboratively to assess alternate resource areas. In reaffirming the selected resource area, this process has also helped to make refinements to the Project such that it meets the need for and purpose of the FRX Project, is technically and economically feasible, and further reduces potential environmental and social impacts, including in response to concerns previously raised by Ktunaxa Nation Council (KNC) and Yaq̓it ʔa·knuqƛi ’it.

As part of this process, and as a mitigation to concerns previously raised by KNC, EVR has adopted a staged mining approach for the Project, dividing the mine plan into two smaller stages based on footprint and schedule, and is proposing that a condition be included in the Environmental Assessment Certificate for the Project requiring that EVR be in compliance with the conditions of the Environmental Assessment Certificate before proceeding onto Stage 2 of the Project. The timing of the staging decision should be made several years prior to the start of mining of the second stage to allow sufficient time for condition compliance, business planning, mine design, and permitting to adapt to either outcome. Other key Project refinements adopted as mitigations to concerns previously raised by KNC and Yaq̓it ʔa·knuqƛi ’it includes:

- **Project location** - While the location remains the same, refinements have been incorporated to continue to avoid and minimize mine rock within the Chauncey Creek catchment area with over 80% of mine rock placement in existing disturbance or in-pit backfill.
- **Project footprint** - The footprint has been reduced where technically feasible, accounting for geotechnical constraints. These refinements avoid additional high elevation grasslands and riparian areas and reduce potential impacts in the Chauncey Creek catchment area.
- **Pit shell** - The pit shell has been reduced and shallowed to keep the bottom of the pit shell above the proximate elevation of the Fording River to reduce the potential impacts with the direction of flow of groundwater. This refinement also reduces total mine rock volumes by approximately 25% while improving Project economics by lowering the strip ratio.
- **Coal volume and mine life** - The pit shell reduction has decreased clean coal volume by approximately 20%, resulting in a shorter Project life of 34 years.
- **Water treatment** - Saturated rock fills (SRFs) are incorporated into both mining stages. The mine design is also amenable to emerging source control technologies, including suboxic zones, which are designed to control the release of constituents at the source, reducing or eliminating release into nearby watersheds.
- **Water management** - A water reservoir has been incorporated to store mine contact water. This reservoir reduces non-mine contact water consumption, enhances water treatment capacity during low-flow periods and provides an opportunity to mitigate and release water during low-flow periods.

- **Landform Design** - Landform designs creating higher land elevations to support ecosystem function and habitat connectivity, and progressive reclamation with ongoing efforts to further enhance landform design.
- **Other plausible mitigations** - Throughout mine design refinements and optimizations, the BC Policy for Mitigating Impacts on Environmental Values has been applied, with attention to the mitigation hierarchy in order of priority. Plausible mitigations to address Ktunaxa Nation's concerns for the continuation of mining in Qukin ʔamakʔis have been further developed.

The outcome of this process is this Revised DPD, which describes a refined and improved Project and addresses all of the deficiencies identified in the BC EAO's 2023 Readiness Decision.



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Figure 1-1: Regional Location of Fording River Operations and the Project (NTS 082G/082J)

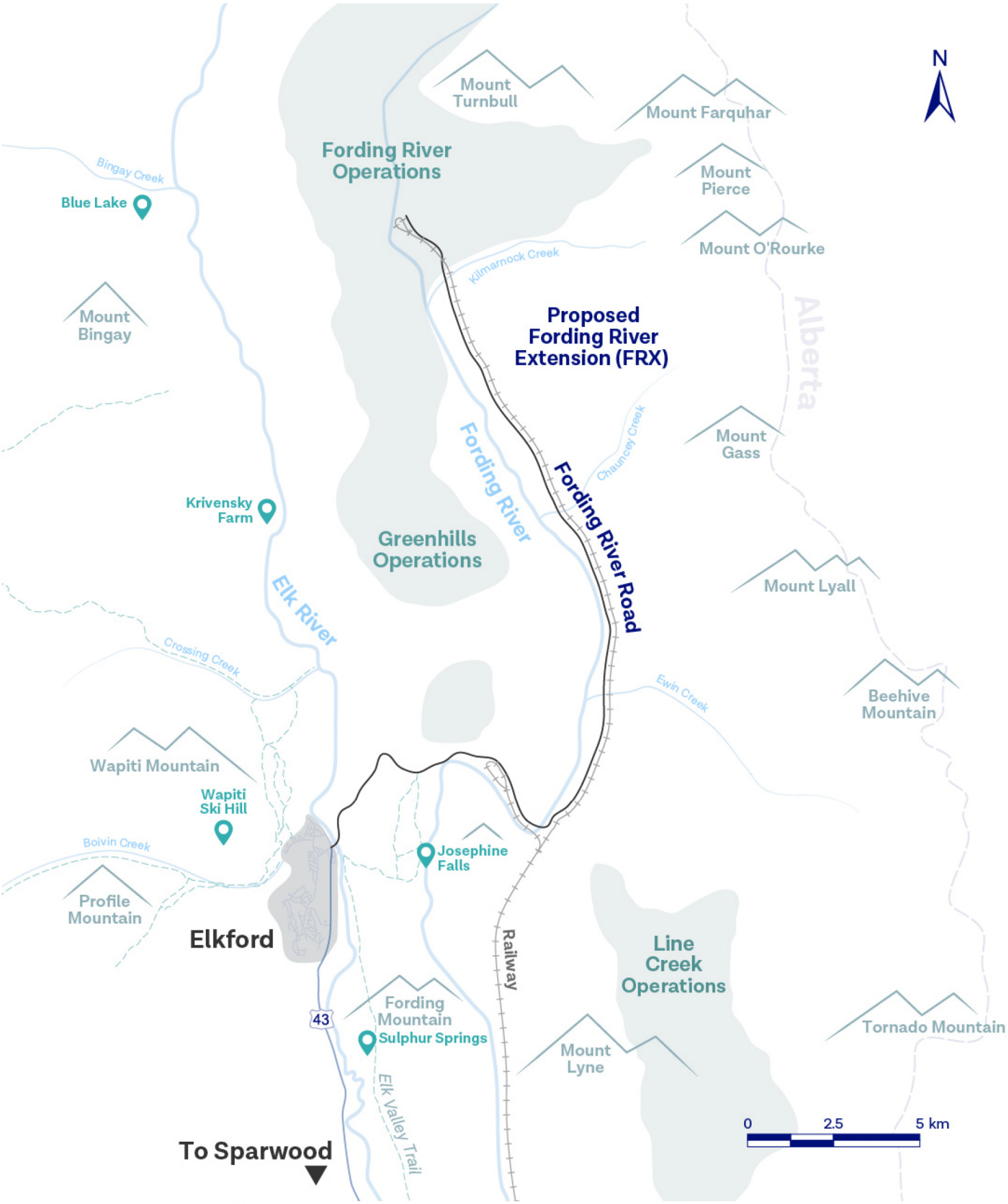
- City / Town / Community
- Project Location
- Primary Highway
- Secondary Highway
- Railway
- Watercourse
- British Columbia - Alberta Boundary
- Coal Mining Operation
- First Nations Reserve
- Municipality of Crowsnest Pass
- Provincial Park / Protected Area
- Waterbody

N

10 km

DATE: 5/1/2025	MINE OPERATION: FORDING RIVER
SCALE: 1:700,000	COORDINATE SYSTEM: NAD 1983 UTM Zone 11N

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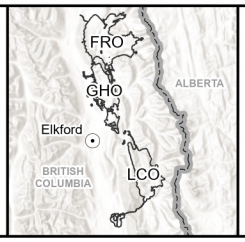


Figure 1-2: Location of Proposed Fording River Extension Project (NTS 082G/082J)

DATE:	MINE OPERATION:
4/30/2025	FORDING RIVER

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1.1 Purpose of the Revised Detailed Project Description

This Revised DPD is being submitted in accordance with Section 15(1) of the federal IAA and as required by the Readiness Decision made by the BC EAO in February 2023. Additional engagement with KNC and Yaq̓it ʔa·knuqɬi ’it occurred following the Readiness Decision. This engagement has informed and refined the Project, as outlined in the Revised DPD.

The Revised DPD has been developed in accordance with guidance set out in the IAAC’s Guide to Preparing an Initial Project Description [IPD] and a Detailed Project Description (IAAC 2020a) and the BC EAO’s Early Engagement Policy Appendix 3, Detailed Project Description Guidelines (BC EAO 2019), as well as from guidance received from the BC EAO from the Readiness Decision issued in February 2023 and through engagement with KNC and Yaq̓it ʔa·knuqɬi ’it. The Revised DPD builds on the following main steps taken regarding the Project to date:

- development of provincial and federal IPD documents (Teck 2020a,b)
- consideration of the information gathered through early engagement on the Project, including consideration of the issues raised in the Summary of Engagement (BC EAO 2020) and the Summary of Issues (IAAC 2020b)
- addressing deficiencies in the DPD submitted in July 2021, as outlined in the BC EAO’s Readiness Decision and following extensive meaningful engagement with KNC and Yaq̓it ʔa·knuqɬi ’it

EVR has worked directly with KNC and Yaq̓it ʔa·knuqɬi ’it to address deficiencies with the July 2021 DPD identified in the BC EAO’s 2023 Readiness Decision. The Revised DPD focuses on summarizing that engagement, including on the topics of alternatives to the Project, alternative means of undertaking the Project and plausible mitigations to Project-related effects, as outlined in Sections 3.0, 4.0 and 10.0, respectively.

Based on the information presented in this document, the IAAC and the BC EAO will determine whether the Project should proceed to an assessment and, if so, will determine:

- the scope of the factors to be assessed and the information or studies necessary to conduct the impact assessment, as required under ss. 18 and 22(2) of the federal IAA
- the scope of the required assessment of the Project, as required under s. 19(2)(a) of the BC EAA

Under the Cooperation Agreement (IAAC 2019), the information requirements for EVR’s Impact Statement/Application (IS/A) will be set out in the Joint Tailored Impact Statement Guidelines/Application Information Requirements (TISG/AIR) for the Project. The TISG/AIR will be issued as a single document that meets the requirements of the federal IAA and the BC EAA.

1.2 Project History and Status

1.2.1 Early Project Development and Exploration Activities

Fording River Operations is a coal mine owned and operated by EVR. The operation was owned and constructed by Canadian Pacific Railway and Cominco starting in 1969 and has been operating since 1972. In 2003, FRO was acquired by the Fording Canadian Coal Trust and the Elk Valley Coal Corporation. In 2008, Teck Resources Limited became the sole owner of FRO. In a transaction that was completed on July 11, 2024, Teck Resources Limited sold its interest in Elk Valley Resources Ltd. to a wholly owned Canadian subsidiary of Glencore plc. Elk Valley Resources Ltd. has a 77% interest in Elk Valley Mines Limited Partnership and Elk Valley Resources General Partner Ltd. Elk Valley Mines Limited Partnership indirectly wholly owns Teck Coal Limited. Following the transaction, Teck Coal Limited (Teck) changed its name to EVR Operations Limited (EVR).

Fording River Operations primarily produces high-quality steelmaking coal; to date, the operation has produced over 323 million metric tonnes of coal. Fording River Operations' current production is from the permitted Eagle and Swift operating areas (Figure 5.1-1). The operation supports a workforce of 1,500 employees.

Exploration activities in the vicinity of the Project started in 1969 and have continued over subsequent years. The potential for mining in the Project area has been identified in the long-range plan for FRO for more than 10 years and was added to the reserves and resources filing in 2010. Starting in 2018, Teck (now EVR) initiated additional exploration activities including preliminary technical studies, engineering designs and environmental data collection. Preliminary engagement on the Project also started in 2018 and has continued since.

To support exploration activities in the Project area, the BC Ministry of Energy, Mines and Low Carbon Innovation (BC EMLI[2]) issued a five-year Multi-Year Area Based (MYAB) Permit CX-5-022 under the *Mines Act* (RSBC 1996, c 293) in 2018. The permit authorized activities related to exploration and geotechnical drilling, test pitting, and pad and road building. Following the BC EAO's Readiness Decision in 2023, Teck (now EVR) shared a letter with KNC stating its commitment to engaging with KNC openly and in good faith to develop shared plans that inspire trust and confidence in its stewardship management. In an effort to demonstrate that commitment, Teck suspended the 2023 planned exploration program for FRX to assist in allowing both parties to focus on engagement. In 2024, a one-year Notice of Work permit was received to complete exploration drilling to support continuation of geological, geotechnical and existing conditions data collection. The program was designed to utilize pre-existing roads and drill pads as well as helicopter-supported drilling to avoid new disturbance in high elevation grasslands while collecting important technical information to support Project engagement and revision. An application for a 2025 exploration program is currently under Ministry review. EVR meets annually with the BC Ministry of Mines and Critical Minerals (BC MCM) and KNC to discuss the annual report for prior year activities and the plan for the year ahead.

Before proposing the Project, the development of the FRX resource area and Turnbull East resource areas in parallel was considered. This option was shared with KNC, BC EMLI and the BC Ministry of Environment and Climate Change Strategy (BC MECCS[3]) in late 2018 as well as the BC Ministry of Forests, Lands, Natural Resource Operations and Rural Development (FLNRORD) in early 2019. Early feedback from these

[2] Now the BC Ministry of Mining and Critical Minerals (BC MCM).

[3] Now the BC Ministry of Environment and Parks (BC EP).

engagement activities raised concerns associated with advancing both areas in parallel. Considering this feedback, it was decided to advance the FRX resource area on its own. Efforts since 2019 have thus been focused on the FRX Project. Through engagement on the Revised DPD, KNC, and Yaq̓it ʔa·knuqƛi ’it have indicated that the Turnbull East resource area remains a potential future mining area for FRO that Ktunaxa Nation may support. EVR will continue to evaluate Turnbull East with Ktunaxa Nation input.

1.2.2 Initial Project Description

The Early Engagement Phase of the provincial assessment process began in April 2020, with the BC EAO acceptance of the provincial IPD. The BC EAO undertook engagement on the provincial IPD, including a public (virtual, due to the COVID-19 pandemic) open house and public comment period. The BC EAO provided Teck (now EVR) with the Summary of Engagement on July 31, 2020. The Project was then designated under Section 9(1) of the IAA by the Minister of Environment and Climate Change Canada (ECCC) in August 2020. The Planning Phase of the federal assessment process was initiated with the submission of a federal IPD and IPD Summary in October 2020, followed by a public comment period, and provision of the Summary of Issues prepared by IAAC in November 2020 (IAAC 2020b).

In accordance with requirements of the BC EAA and the IAA, EVR is required to describe how issues identified during early engagement and documented in the Summary of Engagement and Summary of Issues can or should be addressed in the assessment process. EVR’s responses to the issues are summarized below and presented in more detail in Appendices A and B. Responses to each comment category describe one of the following:

- how the comment, input, interest or concern is accounted for in the Revised DPD and reference to where in the Revised DPD the comment is addressed
- how the issue or comment may be more appropriately addressed in subsequent phases of the coordinated assessment

Refinements made to the Project based on the feedback received during early engagement were identified in the July 2021 DPD and are identified in the Revised DPD to illustrate to readers how and why the Project has evolved since publication of the provincial and federal IPD documents.

To highlight key feedback and how it is being addressed, the Revised DPD uses Early Engagement Feedback Notes in the right-hand page margin. These feedback notes summarize key issues from the Summary of Engagement or Summary of Issues or from feedback that has been received through other avenues of engagement. The feedback notes help highlight where updates to the information about the Project since the provincial and federal IPD documents were published.

The following other information was included in the July 2021 DPD in response to engagement on the IPD documents and has been carried forward to this Revised DPD:

- A description of the role of steelmaking coal and its transition to a low-carbon economy is presented in Section 2.1.
- Highlights of the potential benefits of the Project to the local, regional, provincial and national economies are presented in Section 5.1.4.

- Details on the proposed water quality management plan for the Project are presented in Sections 4.4 and 4.7 and the water quality mitigation approach is presented in Section 5.3.4.
- Section 5.4.2 includes a discussion on potential Project greenhouse gas (GHG) emissions.
- Sections 4.9 and 5.6 provide information on the Project's reclamation and closure plans.
- Concerns about potential water quality effects, potential effects on species at risk (including Westslope Cutthroat Trout [WCT], Rocky Mountain bighorn sheep, high elevation grasslands and whitebark pine) and potential cumulative effects are addressed in Sections 9.1 and 10.0.
- An outline of EVR's regional initiatives, plans and programs, including the Elk Valley Water Quality Plan (EVWQP) and others related to evaluating and managing effects on the VCs listed above, is presented in Sections 9.1.2 and 9.1.3.
- Potential Project-related effects are presented in Section 10.0 and Appendix I, including the potential interactions between the Project and water quality; the potential for the Project to effect WCT, bighorn sheep, high elevation grasslands, whitebark pine and other species or ecosystems at risk; and the potential for the Project to differentially impact the health and well-being of diverse persons or groups. Section 10.0 also outlines the mitigation hierarchy to be applied for the Project (i.e., describing the sequence in which different mitigation strategies will be considered) to avoid, minimize, rehabilitate or, if required, offset impacts. Project-specific mitigations are also outlined in this section. This section has been expanded since the July 2021 DPD.

1.2.3 July 2021 Detailed Project Description

Teck (now EVR) actively incorporated feedback received on the provincial and federal IPD documents to prepare the original DPD, as summarized in the section above. Following additional engagement in fall 2020, the KNC provided feedback on the draft version of the DPD, which was subsequently incorporated and addressed in the document. A summary of the comments and changes are documented in the FRX Comment Tracking Table available on the BC EAO's Project Information Centre (EPIC). Teck then submitted the draft DPD for the Project to the IAAC, BC EAO and KNC on November 27, 2020. Feedback from the draft DPD was subsequently incorporated and a final DPD was prepared; however, Teck delayed submission to allow government-to-government discussions and efforts amongst all parties to respond to outstanding concerns.

In June 2021, Teck provided a letter to the BC EAO's Chief Environmental Assessment Officer (CEAO) indicating Teck's commitment to engaging with the KNC and Province to advance efforts on areas of critical interest to the Ktunaxa Nation. Additionally, Teck communicated that it was ready to submit the DPD. Given the substantial engagement opportunities that exist during the assessment process, the Project's importance to the continuation of the economic and social benefits in the Elk Valley, and the risks that would come with failing to meet the statutory deadline, Teck provided notice of the plan to submit the DPD by July 31, 2021. The DPD was submitted to the BC EAO on July 29, 2021.

1.2.4 Readiness Decision and the Revised Detailed Project Description

1.2.4.1 Summary of Readiness Decision

On August 13, 2021, the KNC leadership sent a letter to the BC Minister of Environment and Climate Change Strategy and the former federal Minister of Environment and Climate Change Canada requesting a suspension of environmental assessments for all proposed new coal mines and coal mine expansions in Qukin ʔamakʔis. The BC Minister of Environment and Climate Change Strategy provided a response on September 8, 2021, that

stated pausing of such assessments, including FRX, was not appropriate and that a key purpose of an environmental assessment process is to identify, evaluate and mitigate the potential impacts of a major project before decisions are made. It was also highlighted that each process should include ample participation and consensus seeking opportunities for the KNC. Rather than suspend environmental assessments in response to KNC's request, BC renewed its commitment to work with the KNC on several priority issues, including water quality and cumulative effects, and to develop a stewardship framework for Qukin ʔamakʔis. The BC EAO maintained that this important government-to-government work could continue in parallel to existing regulatory processes and that it would address some of the issues raised in the KNC environmental assessment suspension request and provide relevant information to inform the FRX assessment should it proceed. Ktunaxa Nation Council participated in this approach but did not agree with the decision to proceed with environmental assessments given their many substantial and outstanding concerns.

On March 23, 2022, the BC EAO issued a draft Readiness Decision Recommendation Report with the preliminary recommendation that the Project proceed to an environmental assessment. Participating Indigenous nations and technical advisors were given the opportunity to review and provide comment on the draft recommendation report. The BC EAO sought consensus with participating Indigenous nations prior to exercising a decision under Section 16(2) of the BC EAA. A dispute resolution process between the BC EAO and the KNC was initiated upon the issuing of the draft recommendation report. The KNC disagreed with the BC EAO's view that the Project, as proposed, would not result in extraordinarily adverse effects on the environment and/or to Ktunaxa and Ktunaxa rights, per the KNC's submission dated August 11, 2022. The purpose of the facilitated dispute resolution process was to inform a Readiness Decision, including whether the July 2021 DPD was sufficient to proceed to an environmental assessment.

At the conclusion of dispute resolution, the BC EAO's CEAO issued a Readiness Decision on February 21, 2023, which directed Teck (now EVR) to submit a Revised DPD for the Project. The BC EAO reached consensus with Kainai, Shuswap Band and Siksika Nation on the recommendation for a Revised DPD. The BC EAO did not reach consensus with Piikani Nation and Ktunaxa, and did not receive a response from the Stoney Nakoda Nations regarding the revised Readiness Decision recommendation. Therefore, the BC EAO could not confirm whether consensus had been reached on the Readiness Decision recommendation.

The BC EAO's CEAO identified the following deficiencies that needed to be addressed in the Revised DPD:

- Clearer identification of alternatives to the Project, with transparent weighting and criteria for assessment of their feasibility including how alternatives are evaluated against the Project purpose. The alternatives considered should at least include those identified in Table 3.2-1 of the July 2021 DPD, and if the available information allows identification of new resource areas or new mines, further definition of these alternatives should also be included.
- Clearer identification of alternative means of carrying out the Project, with transparent weighting and criteria for assessment of their feasibility. Alternative means of carrying out the Project should consider options such as changes to siting, staging, timing and technologies.
- Ensure that the DPD lists all the potential impacts, including cumulative impacts, of the Project on biophysical components and to Ktunaxa rights that have been identified as part of the dispute resolution process and identify plausible mitigations to impacts on Ktunaxa and Ktunaxa rights.

- Ensure the DPD includes all plausible measures that mitigate the effects of the Project and cumulative effects in the Project area that the Project would contribute to.
- Confirm if Ktunaxa and Yaq̓it ʔa·knuqƛi ’it agree that the proposed mitigation measures for effects on Ktunaxa rights are plausible.
- Identify and describe mitigation measures necessary to resolve Ktunaxa and Yaq̓it ʔa·knuqƛi ’it assertions of extraordinarily adverse effects.
- Apply the BC Policy for Mitigating Impacts on Environmental Values when identifying plausible mitigation measures, with attention to the mitigation hierarchy in order of priority.

Alternatives to the Project and alternative means of carrying out the Project are described in detail in Sections 3.0 and 4.0 of this Revised DPD, respectively. A list of potential Project-related effects, including potential cumulative effects, is presented in Appendix I. Section 10.0 provides details on potential Project-related effects with a focus on those asserted by Ktunaxa Nation and Yaq̓it ʔa·knuqƛi ’it to be extraordinarily adverse and plausible mitigations. Section 10.0 also describes how the BC Policy for Mitigation Impacts on Environmental Values has been applied.

1.2.4.2 Summary of Feedback from Participating Indigenous Nations

As outlined by BC EAO in the February 2023 Readiness Decision, pursuant to Section 16(1) of the BC EAA, the BC EAO sought consensus with participating Indigenous nations before the Readiness Decision was made under Section 16(2):

- On March 23, 2022, a previous version of the Readiness Decision Recommendation Report was provided in draft to participating Indigenous nations for their review and comment. Participating Indigenous nations were asked to provide their views on the BC EAO’s preliminary Readiness Decision Recommendation Report to proceed to an environmental assessment. More specifically, participating Indigenous nations were asked to identify whether the DPD contained enough information to identify Project interactions with Indigenous nations’ interests and whether the issues raised by each nation had been adequately addressed in the DPD or could be carried forward into subsequent phases, should the Project proceed to an assessment.
- Following the completion of the dispute resolution process, which resulted in a revision of the BC EAO’s recommendation, a revised Readiness Decision Recommendation Report and the draft referral package was provided to participating Indigenous nations for review and comment with a request for each nation to confirm whether consensus was reached on the revised recommendation (BC EAO 2023).

Like the Readiness Decision Recommendation Report, the following sections summarize the concerns and interests expressed by participating Indigenous nations and includes input received on the sufficiency of the DPD to inform the revised Readiness Decision options.

Engagement is ongoing with each Indigenous group. EVR is committed to engaging with the potentially affected Indigenous Peoples to understand and mitigate the Project’s potential effects on current land use and impacts to the rights of Indigenous Peoples. EVR’s proposed engagement with potentially affected Indigenous Peoples includes developing an understanding of how to incorporate traditional and community knowledge and cultural perspectives in the assessment. While this engagement will continue throughout the assessment process, it will be of most value if traditional and community knowledge is available early in the assessment process.

1.2.4.2.1 Ktunaxa Nation Council and Yaq̓it ʔa·knuqƚi ’it

Feedback provided by KNC, on behalf of the Ktunaxa Nation and Yaq̓it ʔa·knuqƚi ’it, as part of the dispute resolution and Readiness Decision process is summarized below.

Following submission of the DPD in July 2021, KNC requested a suspension of environmental assessments for coal mines in the Elk Valley, citing concerns about cumulative effects and impacts to Ktunaxa title, rights and cultural practices from past development (KNC 2021). On April 8, 2022, a dispute resolution process was initiated by the KNC regarding the draft Readiness Decision Recommendation Report for the Project dated March 23, 2022.

On August 11, 2022, KNC submitted a request to the BC EAO and CEAO for termination of the Project (KNC 2022a). The letter shared Ktunaxa’s perspective that enough was known about the Project to believe that the effects on the environment and to Ktunaxa rights would be extraordinarily adverse. Issues raised in this letter and subsequent submissions (November 3, 2022; KNC 2022b) focused on the following themes:

- the size of the FRX Project and location within a heavily impacted area of the region
- unmitigable effects of the Project that would impact Ktunaxa cultural practices, stewardship authority and rights
- unmitigable effects on VCs of the natural environment
- concern about the ability to accurately predict, control, manage and mitigate the adverse effects of steelmaking coal mining in the region

At that time, KNC recommended that the Project be terminated pursuant to Section 17 of the BC EAA.

Summary of Issues Raised During Dispute Resolution

On August 24 and 25, 2022, meetings on the land took place as a part of the dispute resolution process. During that meeting, decision makers met directly with Ktunaxa citizens to discuss their knowledge and experience with coal mining in the Elk Valley. A summary of those meetings identified the following issues (KNC 2022c):

- concerns about cumulative effects in the Elk Valley
- concerns about high elevation grasslands
- concerns about selenium and other constituents downstream
- concerns about impacts from industrial use on place-specific knowledge transfer and use
- concerns about mitigation practices
- concerns about the speed of reclamation

At the end of the dispute resolution process, the following conclusions were shared by the BC EAO’s CEAO in the Reasons for Decisions Document (2023):

> *Ktunaxa continue to view termination as the appropriate decision at this stage, however, in recognition that the BC EAO is recommending Teck submit a revised Detailed Project Description, Ktunaxa generally agreed with and supported the suggested requirements for engagement and information to be included in a revised Detailed Project Description.*

The parties agreed that Teck should provide further consideration of alternatives to the Project and/or substantial modifications to the Project including alternative means of carrying out the Project to arrive at a concept that does not have the potential to result in extraordinarily adverse effects.

Ktunaxa indicated that it is open to the consideration of Teck submitting a different project that is more compatible with Ktunaxa rights and accounts for existing conditions, but this may be conditional on the negotiation of a consent-based decision-making agreement; and, Ktunaxa conditioned its support for a revised Detailed Project Description on the understanding that a future termination recommendation remains an option, based on the outcomes of the engagement to provide information in a revised Detailed Project Description.

1.2.4.2.2 Kanai (Blood Tribe)

Kainai (Blood Tribe) identified preliminary interests and concerns that include but are not limited to impacts on:

- Kainai's practice of Aboriginal rights and their access to lands that support traditional, cultural and spiritual use
- direct and indirect cumulative impacts on Aboriginal and Treaty rights, sense of place, way of life and the ability to pass down cultural knowledge between generations
- plants and materials for medicinal, ceremonial and subsistence use
- locations of cultural, spiritual or historical importance
- wildlife, fish and fish habitat
- human health, water quality and air quality

Kainai have also expressed an interest to participate in engagement planning to define the information requirements, methods and details required for the impacts on rights assessment. Kainai brought forward these preliminary interests, which will be considered during the Process Planning Phase to inform the TISG/AIR and methods necessary to assess the potential impacts of the Project on the Kanai's interests, should the Project proceed to an assessment. On April 8, 2022 Kainai communicated support for the Readiness Decision recommendation to proceed to a coordinated federal and provincial assessment but highlighted unanswered questions they would like to see addressed as part of evaluating potential Project effects on Kainai interests and VCs.

Specifically, Kainai seek to better understand how the BC EAO will take into account cumulative effects of industrial development on the practice of Aboriginal and Treaty rights throughout the Elk Valley and broadly throughout the Rocky Mountains and how the Yahey versus British Columbia decision (2021 BCSC 1287) will influence project approvals. Additionally, Kainai are concerned about adverse interprovincial environmental impacts of the Project flowing into Blackfoot territory in Alberta and how past mining and the proposed Project mine life impacts (extending into the 2060s) can be remediated.

1.2.4.2.3 Piikani Nation

Piikani Nation has identified interests in economic development and opportunities for community members to participate in development projects while protecting Aboriginal and Treaty rights. Piikani Nation has also identified specific interests and concerns that include but are not limited to impacts on:

- water quality and demonstrating target performance
- high elevation grasslands and wildlife habitats of importance to Piikani
- cumulative effects on culturally significant habitats and input on cumulative effects methods
- fish and fish habitat, particularly WCT
- human health and confidence in wild foods
- wildlife and plants of cultural significance
- archaeological sites
- access to lands that support traditional, cultural and spiritual use
- potential impacts to traditional land and resource use, including effects and risks to current and future generations of harvesters and land users

Piikani Nation has brought forward these preliminary interests, which the BC EAO indicated will be considered during the Process Planning Phase to inform the TISG/AIR and methods necessary to assess the potential impacts of the Project on Piikani Nation's interests, should the Project proceed to an assessment.

After the dispute resolution process concluded between the KNC and BC EAO, Piikani Nation was provided a copy of the revised Readiness Decision Recommendation Report and the additional referral materials. Piikani Nation was asked to confirm whether consensus had been achieved with the BC EAO on the recommendation for the Readiness Decision. Piikani Nation provided a submission on January 20, 2023, with their recommendation that the Project be referred to the Minister with the requirement that the assessment be conducted by an assessment body composed of potentially impacted Indigenous nations, including Piikani Nation. The BC EAO concluded it will not be recommending that the Project be referred to the Minster to require that the assessment be conducted by an assessment body.

Although Piikani Nation confirmed that consensus has not been reached on the BC EAO's revised Readiness Decision recommendation, Piikani Nation indicated general agreement with the BC EAO's recommendation to have EVR revise the DPD to include alternatives to the Project and alternative means to carrying out the Project. Piikani Nation also suggested that the Revised DPD include a detailed understanding of Piikani Nation's historical, current and future land use in areas of the Elk River Valley potentially impacted by the Project. While the BC EAO agreed that this information will be necessary in the event the Project proceeds to an assessment, the BC EAO did not require this information to inform the Readiness Decision.

1.2.4.2.4 Shuswap Band

Shuswap Band has identified preliminary interests and concerns that include but are not limited to impacts on:

- air and water quality
- water treatment efficacy
- fish (specifically WCT)

- riparian habitats and tributary health
- wildlife such as bighorn sheep and grizzly bear
- plants of cultural significance
- access to areas of key cultural and spiritual significance
- direct impacts to subsistence harvesting, fishing and hunting opportunities, and the impact of this on transmission of knowledge and practices across generations
- archaeology sites
- direct, indirect and cumulative impacts to soil, wildlife, plants, emissions and water
- human health related to water quality, air quality and noise

Shuswap Band also expressed interests in assessment process participation (including VC and indicator selection, integration of Indigenous knowledge, mitigation measures and management plans), Project-related economic opportunities and post-construction monitoring opportunities. Shuswap Band have provided preliminary interests, which will be considered during the Process Planning Phase to inform the TISG/AIR and methods necessary to assess the potential impacts of the Project on Shuswap Band's interests, should the Project proceed to an assessment.

Shuswap Band reviewed the March 23, 2022 draft Readiness Decision Recommendation Report and identified outstanding concerns in the DPD in feedback provided to the BC EAO on April 13, 2022. Shuswap Band disagreed with the DPD consultation commitments on employment benefits as they did not explicitly identify equal access to training and employment opportunities for Shuswap Band. The BC EAO and Shuswap Band agreed that this comment could be carried forward to Process Planning. Shuswap Band also requested the date of predevelopment conditions be shifted from 1890 (time of first mining development) to 1846 (time of contact) to adequately capture non-mining-related impacts prior to 1890. The BC EAO and Shuswap Band agreed that the methods for the assessment of cumulative effects are best addressed during Process Planning during the collaborative development of the Process Order, which includes the TISG/AIR, Assessment Plan and Regulatory Coordination Plan, should the Project proceed to an assessment. Shuswap Band also identified an error in the text of the DPD referring to Shuswap Band as Shuswap Nation. Related to this error, Shuswap Band commented that "the DPD does not reflect the considerations of either the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) or reconciliation efforts." The BC EAO agreed to ensure this comment is brought forward to Process Planning and to work with Shuswap Band to determine how considerations of UNDRIP and reconciliation can be included in the TISG/AIR. EVR has discussed this error with Shuswap and will ensure proper reference in all future documentation. A summary of these comments and concerns have been added to the FRX Comment Tracking Table available on EPIC and will be addressed through consensus seeking on the Process Order, which will define the scope, information requirements and methods of the assessment, should the Project proceed to an assessment.

1.2.4.2.5 Siksika Nation

Siksika Nation has identified preliminary interests and concerns that include but are not limited to impacts on:

- practice of Aboriginal rights and access to lands that support traditional, cultural and spiritual use
- direct and indirect cumulative impacts on Aboriginal and Treaty rights, sense of place, way of life and ability to pass down cultural knowledge between generations

- interprovincial impacts on Blackfoot territory in Alberta
- harvest of plants and materials for medicinal, ceremonial and subsistence use
- locations of cultural, spiritual or historical importance
- wildlife, fish and fish habitat
- human health
- headwaters, water quality and air quality

Siksika Nation also expressed an interest in defining the information requirements, methods and details required for the impacts on rights assessment. Siksika Nation has brought forward these preliminary interests, which will be considered during the Process Planning Phase to inform the TISG/AIR and methods necessary to assess the potential impacts of the Project on Siksika Nation's interests, should the Project proceed to an assessment.

Siksika Nation reviewed the March 23, 2022 draft Readiness Decision Recommendation Report and sent correspondence on April 8, 2022, communicating support for a coordinated federal and provincial assessment but highlighting unanswered questions that they would like to see addressed as part of evaluating potential Project effects on Siksika Nation interests and VCs. Specifically, Siksika Nation seeks to better understand how the BC EAO will consider cumulative effects of industrial development on the practice of Aboriginal and Treaty rights throughout the Elk Valley and broadly throughout the Rocky Mountains and how the Yahey versus British Columbia decision (2021 BCSC 1287) will influence Project approvals. Additionally, Siksika Nation is concerned about adverse interprovincial environmental impacts of the Project flowing into Blackfoot territory in Alberta and how past legacy impacts and the proposed Project mine life impacts (extending into the 2060s) can be remediated.

The BC EAO and Siksika Nation agreed that outstanding comments and concerns would be added to the FRX Comment Tracking Table to be addressed through consensus seeking on the Process Order, which will include the TISG/AIR, Assessment Plan and Regulatory Coordination Plan, should the Project proceed to an assessment.

1.2.4.2.6 Stoney Nakoda Nations

The Stoney Nakoda Nations have identified preliminary interests and concerns that include, but are not limited to, impacts on:

- Section 35 rights; hunting, harvesting, ceremonial and sacred sites; and other cultural practices
- access to traditional lands
- documentation and preservation of traditional place names and oral narrative
- traditional use
- stewardship, management and monitoring of traditional lands
- cultural perspectives
- inclusion of traditional knowledge of fish and fish habitat, wildlife and water included in the assessment

The Stoney Nakoda Nations have provided preliminary interests, which will be considered during the Process Planning Phase to inform the TISG/AIR and methods necessary to assess the potential impacts of the Project on the Stoney Nakoda Nations' interests, should the Project proceed to an assessment. The Stoney Nakoda

Nations reviewed the DPD and did not request additional information or changes. The Stoney Nakoda Nations were also invited to review and provide comments on the March 23, 2022, draft Readiness Decision Recommendation Report and to confirm consensus on the recommendation to proceed to an assessment, but did not provide a response to the BC EAO. The BC EAO has proposed that the comments provided by the Stoney Nakoda Nations to date be addressed during collaborative development of the TISG/AIR and consensus seeking on the Process Order, which will define the scope, information requirements and methods of the assessment, should the Project proceed to an assessment.

1.2.4.2.7 Tsuut'ina Nation

Tsuut'ina Nation has not self-identified as a participating Indigenous nation but has opted to engage directly with the BC EAO for the Project. Tsuut'ina Nation has provided initial interests on how the Project may impact mountains, water quality and quantity, ecosystem function, and access to areas of solitude for traditional and cultural rights practice.

1.2.5 Engagement on the Revised Detailed Project Description

In the spirit of collaboration and recognizing the importance of EVR's relationship with Ktunaxa Nation, EVR has endeavoured to engage KNC and Yaq̓it ʔa·knuqƚi 'it in accordance with the BC EAO Readiness Decision Letter (BC EAO 2023). Consistent with the Readiness Decision, EVR has had constructive discussions on key topics such as learning from previous work, considering broader interests, engagement with Ktunaxa Nation, the role of BC and Canada, the importance of leadership-level discussions and respecting Yaq̓it ʔa·knuqƚi 'it's preferred participation. Additionally, EVR, KNC and Yaq̓it ʔa·knuqƚi 'it have had important leadership-level engagement on broader future mine development in Qukin ʔamakʔis.

Both leadership and technical/community member engagement have provided key insights into what is important to Ktunaxa Nation and Yaq̓it ʔa·knuqƚi 'it and has helped improve FRX Project compatibility with Ktunaxa values, accounting for existing conditions.

Closing the Gap

Through re-engagement, KNC and Yaq̓it ʔa·knuqƚi 'it expressed concerns about the regional issues that need to be addressed, outside of the FRX Project, termed "closing the gap." The most important areas for closing the gap were identified and are outlined in Table 1.2-1. Through the series of workshops, the teams collaboratively developed a framework to gain perspective on and measure the progress of addressing pre-existing issues and where progress needs to be demonstrated through a process grounded in Ktunaxa stewardship principles and the concept of Yaqaƚ Hankatiɬiɬki na ʔamak, which means "Our people care for the land and the land cares for our people." This work was intended to help embed Ktunaxa stewardship principles within EVR, and EVR is committed to continue to work with KNC and Yaq̓it ʔa·knuqƚi 'it to collaboratively address these concerns outside of the FRX Project.

A document outlining the framework has been provided to Impact Management and Benefits Agreement (IMBA[4]) representatives and Yaq̓it ʔa·knuqƚi 'it for consideration on the mechanism(s) (e.g., IMBA, interim

[4] Refer to Section 7.1.2 for information on the IMBA between Teck (now EVR) and the Ktunaxa Nation.

agreement) that are most appropriate to address each item. As collaboration on this initiative continues, it was agreed to proceed in evaluating the Project scope in an effort to proceed to the assessment.

Table 1.2-1: Overview of Yaqał Hankatiłiłki na ʔamak Document

Ktunaxa Stewardship Principle	Objective
We All Care for the Land	
Ensure that long-term stewardship and ecological integrity take precedence.	• A culture of Stewardship embedded in EVR. • Integration of Ktunaxa Art, Culture and Language at EVR. • EVR and Ktunaxa have a shared vision of ensuring long-term stewardship and ecological integrity take precedence.
Ensure land, air and water are and will be clean and healthy.	• Is the water safe and healthy for ʔa-kxaʔmis ɋapi qapsin (all living things)? • Is the land safe and healthy for ʔa-kxaʔmis ɋapi qapsin? • Is the air safe and healthy for ʔa-kxaʔmis ɋapi qapsin?
Maintain, protect, manage and restore healthy and diverse ecosystems.	• EVR and Ktunaxa working together to maintain, protect, manage and restore healthy and diverse ecosystems.
The Land Cares for Us	
Contribute to the betterment of future generations.	• Mining provides economic resources to Ktunaxa. • Development of the Cultural Management Plan. • Ktunaxa can access the Land and are accessing the Land with confidence. • Ktunaxa are able to use the land post-closure.

EVR = EVR Operations Limited

Technical- and Community-Level Engagement on the Revised Detailed Project Description

Technical-level engagement with KNC and Yaɋit ʔa·knuqƚi ’it occurred via seven workshops and small group meetings. Workshops focused on alternatives to the Project, alternative means of carrying out the Project and mitigation measures. Planning for the workshops was done collaboratively by a small planning group made up of employees from KNC, Yaɋit ʔa·knuqƚi ’it and EVR. Project engagement was co-designed with Yaɋit ʔa·knuqƚi ’it and KNC in a manner consistent with the Ktunaxa Vision Statement (Ktunaxa Nation 2024): “Strong, healthy Citizens and communities, speaking our languages and celebrating who we are and our history in our ancestral homelands, working together managing our lands and resources within a self-sufficient, self-governing Nation.” Community members and representatives from multiple KNC and Yaɋit ʔa·knuqƚi ’it sectors attended the workshops to provide a multidisciplinary approach and affirm the importance of engaging on cultural, socio-economic and environmental themes.

Feedback provided by KNC and Yaɋit ʔa·knuqƚi ’it at the workshops and planning meetings related to four main themes:

1) The importance of Ktunaxa Leadership and EVR Leadership involvement in the Revised DPD engagement and decision making. Leadership engagement is discussed in the following section.

2) The need for progress on key regional items such as water quality and reclamation. Progress on key regional issues is being managed outside of the DPD process.

3) Specific feedback on alternatives to the Project, alternative means of carrying out the Project and impacts and mitigations. These matters are discussed in Sections 3.0, 4.0 and 10.0 of the Revised DPD, respectively.

4) Workshop #7 focused on plausible mitigations related to terrestrial, aquatics, and Ktunaxa rights. The outcome of the workshops are the tables provided in Section 10.1.

Throughout the course of the workshops, key criteria proposed for use in evaluating alternatives to the Project were shared by KNC, Yaq̓it ʔa·knuqƛi ’it, and EVR. By the end of the workshops, it was agreed by participants that the Castle Mountain mine development area was the only feasible alternative to meet the need for and purpose of the Project of sustaining FRO (see Sections 2.2 and 3.2 for additional details). Concerns were raised by KNC and Yaq̓it ʔa·knuqƛi ’it on the planned Project duration; therefore, the Project has adopted a staged mining approach, dividing the mine plan into two smaller stages based on footprint and schedule to support generational decision making (Section 4.10). Discussions on plausible mitigations, with a focus on Project-related effects identified by Ktunaxa Nation, including those that have the potential to be extraordinarily adverse, occurred throughout the workshops, with a focused plausible mitigations workshop held in March 2025. Feedback from the plausible mitigation workshop was subsequently incorporated into the Revised DPD.

In addition, on March 14, 2025, KNC and Yaq̓it ʔa·knuqƛi ’it were provided the draft Revised DPD for opportunity for feedback and input related to the way their work together with EVR has been characterized, the refinements to the Project, and the plausible mitigations within Section 10.0. Feedback provided by Yaq̓it ʔa·knuqƛi ’it and KNC on that document has been incorporated into the Revised DPD. Further engagement on Project mitigations and future monitoring will occur within the assessment phase of the Project.

Leadership-Level Engagement

Through leadership-to-leadership forums, it has been shared that there is a desire for a more direct relationship between EVR and Ktunaxa Leadership. Following the workshops, the outcomes were presented to individual Ktunaxa Leadership as well as to citizens and knowledge holders through the Land and Water Work Group and Traditional Knowledge and Land Advisory Council and finally to the larger All-20 Ktunaxa Leadership and Council. Work is underway to collaborate on the future of mining in Qukin ʔamakʔis and the FRX assessment. Advancing the Project has required alignment on the Project description and priority actions to respond to pre-existing cumulative effects concerns. EVR is working with Ktunaxa Leadership and Yaq̓it ʔa·knuqƛi ’it to foster this alignment.

Since submission of the July 2021 DPD, EVR has also progressed interim agreements. In February 2024, Yaq̓it ʔa·knuqƛi ’it and Teck (now EVR) announced the signing of a Relationship Charter, which formalizes the commitment of both parties to develop and sustain a strong working relationship, and a Stewardship Agreement, which outlines collaboration on environmental and cultural stewardship projects. The Relationship Charter establishes a path forward to collaboratively advance responsible mining and land stewardship within Qukin ʔamakis. Yaq̓it ʔa·knuqƛi ’it and EVR have committed to continued collaboration and engagement.

In addition to the above engagement, in May 2024, yaqan nuʔkiy and Teck (now EVR) entered into an Interim Relationship and Funding Agreement with the aim of advancing priority socio-economic, environmental and cultural stewardship projects, while strengthening the working relationship between the parties. Due to limited uptake to date, that agreement is likely to be revisited/revised in the near future. Subsequently in May 2024, Akisqnuk and Teck entered into a similar Interim Relationship and Funding Agreement which has been more substantially acted upon.

EVR has deferred to ʔaq'am's preference for engagement to advance through the KNC, as requested.

Following the workshops, EVR met with Yaq̓it ʔa·knuqƛi 'it, Akisqnuk, ʔaq'am, and yaqan nuʔkiy Chief and Councils between February to April 2025 to provide an update on the collaborative work completed with staff following the Readiness Decision including refinements to the Project and the approach to addressing regional concerns.

EVR additionally had met with the Ktunaxa All-20 leadership on March 26, 2025, providing an update on the collaborative work to date on the Project and requested to come back in April to seek decision for submission of the Revised DPD. In preparation for the All-20 meeting held on April 23, 2025, EVR provided a briefing note providing a further update on work completed by EVR, KNC and Yaq̓it ʔa·knuqƛi 'it, and to seek a decision on whether or not the decision to submit the Revised DPD could be supported. The response communicated to EVR from the All-20 meeting indicated plausible mitigations needed further review by KNC and further engagement with ?aq'am and an ?aq'am site visit. Working through requested items with KNC, EVR provided a letter to KNC on May 21, 2025 with the commitment from EVR to defer submission of the Revised DPD to early July to allow for the identified activities to occur prior to submission, which included incorporating feedback from the Ktunaxa All-20 leadership meeting on June 25 and 26th, 2025. Feedback from that meeting included that KNC has confirmed that staging the FRX Project is an important mitigation to carry forward and will determine if mitigations are plausible after the Revised DPD is submitted and during the Readiness phase. EVR acknowledges that a decision to move to assessment is not a determination by the EAO about the technical and economic feasibility of those measures. Further work will be required during the environmental assessment on plausible mitigations for the Project based on the results of the assessment.

1.3 Company Information

EVR Operations Limited (EVR) is the sole proponent of the Project.

1.3.1 Company Overview

EVR is committed to responsible mining, operating four steelmaking coal mines employing over 5,000 people in the Elk Valley. EVR produces high quality, low-carbon steelmaking coal, a key transition-enabling commodity that is essential for transportation, construction and energy transition infrastructure. Headquartered in Vancouver, BC, EVR is part of the Glencore Group, with minority interests owned by affiliates of Nippon Steel Corporation and POSCO.

EVR has four operating open-pit coal mines (Coal Mountain mine is now in care and maintenance) in the Elk Valley of southeastern BC (Figure 1-2):

- Fording River Operations (FRO)

- Greenhills Operations (GHO)
- Line Creek Operations (LCO)
- Elkview Operations (EVO)

Together, these operations account for an annual production capacity of 26 to 27 million metric tonnes of high-grade steelmaking coal, which is sold to consumers around the world (e.g., North America, Europe, South Korea, Japan, China and India).

EVR (previously Teck Resources Limited) has been the sole owner of FRO since 2008.

1.3.2 Company Contact Information

The contact information for the corporate headquarters and regional office is as follows:

EVR Operations Limited
Suite 2700 - 595 Burrard Street
Three Bentall Centre
Vancouver, BC V7X 1L2
T: 236.484.2200

Regional Office
PO Box 1777
421 Pine Avenue
Sparwood, BC V0B 2G0
T: 250.425.8096

For the purposes of the assessment of the Project under the IAA and BC EAA, the primary EVR contact person is:

Carly Merkosky, Manager, Regulatory Approvals, Fording River Extension Project
PO Box 1777
421 Pine Avenue
Sparwood, BC V0B 2G0
Tel: 250.425.4083
Email: Carly.Merkosky@evr.com

1.3.3 Corporate Policies

EVR Operations Limited, and all its operations, is committed to responsible business practices in all aspects of its activities. EVR's approach is overseen by the Glencore Board, through its Health, Safety, Environment, Communities and Human Rights (HSEC&HR) Committee, and is integrated across the business through a range of standards, procedures and processes.

EVR's company-wide policies within the HSEC and HR Management Standard are outlined in the following key policy and standard documents:

- *Energy and Climate Change Standard* sets the company's requirements to implement effective and efficient management of energy use, promote the reduction of GHG emissions and manage associated climate risks and opportunities, including those related to its value chains.
- *Code of Conduct* sets out the company's dedication to upholding high moral and ethical standards, specifying basic business conduct and behaviour.

- *Environmental Policy* articulates the fundamental elements of our environmental management approach to minimizing impacts and promotes actions to achieve consistent environmental performance across our business.
- *Tailings Storage Facility Policy* sets out the company's approach to managing tailings facilities sustainably throughout the mining life cycle, including planning, design, construction, operation and closure.
- *Health and Safety Policy* articulates the fundamental elements of the company's approach to health and safety management wherever we operate.
- *Human Rights Policy* articulates the fundamental elements of the company's approach to respect human rights.
- *Social Performance Policy* articulates the fundamental elements of our approach to our engagement and participation in society.
- *Supplier Code of Conduct* outlines the company's approach to responsible sourcing taking into account the social, ethical and environmental considerations.
- *Contractors and Suppliers HSEC&HR Management Standard* sets out the mandatory requirements for the management of Contractors and Suppliers, with respect to HSEC&HR risks and compliance against Glencore's HSEC&HR Requirements.

2.0 Project Need and Purpose

2.1 The Role of Steelmaking Coal in the Transition to a Low-Carbon Economy

Steel plays a critical role in today's modern society, including the building of infrastructure such as rail, bridges, hospitals and schools, which is needed to maintain and improve the quality of life for people around the world. Steel demand will be driven by increasing population, economic growth and urbanization as a key component of infrastructure development and construction, particularly in high growth regions and in other developing economies, where 2 to 3 billion people are projected to join the global middle class by 2050. From building wind turbines and energy-efficient buildings, to deploying electric vehicles, hybrid buses and rapid transit lines, steel is also essential to build out the infrastructure required to transition to a low-carbon economy. As one of the most widely used materials, steel is also suitable for the circular economy as it is easily recyclable and difficult to substitute in most applications.

Steelmaking coal is a vital ingredient in the production of steel. A sub-type of steelmaking coal called coking coal is a higher-grade coal that is used to produce an intermediary product – coke – which is then used in the chemical, thermal and mechanical processes that transform iron ore into hot metal. This use of steelmaking coal in the hot metal and steelmaking processes results in GHG emissions. Once produced, hot metal can then be produced into steel using the blast furnace-basic oxygen furnace (BF-BOF) or the electric arc furnace (EAF) process. Today, according to the World Steel Association (2025), about 71% of steel is produced using the BF-BOF process, which requires high-quality, hard coking coal, and only 29% through the EAF process.

Globally, the steel sector has a 7% to 9% share of global GHG emissions and therefore has a major role to play in global decarbonization. As the steel sector works to decarbonize, in addition to the efficiency improvements in existing steelmaking processes over time, four primary pathways are foreseen to reduced GHG emissions in steelmaking by 2050:

- increased recycling of scrap steel via the EAF steelmaking process
- the application of carbon capture, usage and storage (CCUS) for natural-gas-based direct reduced iron
- the use of carbon-free steel production processes using hydrogen-based direct reduction processes
- the application of CCUS for blast furnaces (BF+CCUS)

All four of these pathways will be essential in delivering carbon reductions in the steel production process; the degree to which they will each contribute along this journey will differ over time and geography. EVR believes that BF+CCUS is the only abatement technology capable of decarbonizing the steelmaking industry at the rate and scale required by 2050 to limit global temperature increases to 1.5°C (Teck 2022a).

EVR's analysis indicates that demand for seaborne steelmaking coal will remain robust through 2050 across these scenarios, in large part due to steel demand growth in regions that rely on low-cost, high-quality seaborne steelmaking coal, and specifically hard coking coal, imports. EVR's view is based on the following points (Teck 2022a):

- First, as noted above, EVR anticipates significant steel demand growth out to 2050.

- Second, EVR anticipates that scrap consumption will increase out to 2050. Scrap recycling currently accounts for approximately 30% of global crude steel production; as the cornerstone for the circular economy, scrap is the lowest-cost decarbonization lever in the steel industry. Scrap availability varies by region, and while it is expected to grow up to 50% globally by 2050, its use will be limited to regions with abundant scrap availability and/or low natural gas costs. Scrap use is therefore expected to be limited in new growth regions with limited existing steel-based infrastructure, such as India and Southeast Asia, limiting the use of EAF in these regions in favour of blast furnace steelmaking. To ensure that scrap use supports decarbonization of steel production, the significant increase in electricity demand associated with use of EAF steel production must be met with low-carbon sources of power.
- Third, while hydrogen-based steelmaking processes are expected to grow over time, the scale of the supporting renewable infrastructure required, and the technological hurdles associated with producing low-cost hydrogen, make near-term adoption highly unlikely. It is estimated that the cost of hydrogen would need to decline by more than 65% to US$1 to US$2 per kilogram in conjunction with a supportive carbon pricing environment to economically incentivize large-scale adoption of hydrogen direct reduced iron technology; this is not expected to occur before 2040. As the cost of hydrogen decreases and the world increasingly adopts low-carbon solutions, demand for other hydrogen in other low-carbon applications will likely increase, such as for energy storage to support intermittent generation sources like solar, and may be prioritized over the use of hydrogen for steelmaking. While the cost of hydrogen presents a barrier, an equally important limitation is the inadequate availability of high-grade iron ore pellets required to produce steel via hydrogen-based steelmaking processes.
- Fourth, EVR anticipates that CCUS technologies will be applied at many existing blast furnaces. The application of CCUS to existing blast furnaces is the most cost-competitive decarbonization technology, as it leverages the more than US$1 trillion in installed blast furnace assets that would otherwise be stranded. Unlike hydrogen technology, it does not rely on large-scale renewable infrastructure for low-cost hydrogen power. Instead, at an average carbon abatement cost of US$50 to $100 per tonne of carbon dioxide (CO_2), CCUS is well positioned for large-scale adoption. Carbon capture, usage and storage is already a proven technology in other hard-to-abate industries and has the potential to reduce up to 80% of emissions at existing integrated steelmaking facilities. As with many GHG reduction and abatement efforts, CCUS success will also be tied to carbon pricing and technical and logistical considerations, such as further development of large-scale CO_2 transportation to deliver captured CO_2 to sequestration sites.

Across varying climate scenarios, EVR predicts decreases in demand for steelmaking coal over the longer term (Teck 2022a). However, EVR's analysis indicates that demand for seaborne steelmaking coal will remain robust through at least 2050 across these scenarios, in large part due to steel demand growth in regions that rely on high-quality steelmaking coal and specifically hard coking coal imports. EVR's understanding is that the decarbonization of steel production will require all the technologies discussed above. No single abatement technology in the short or long term will be the solution to reducing emissions in the steelmaking sector.

EVR's high-quality steelmaking coal is expected to remain resilient under different climate change scenarios. Use of the steelmaking coal EVR produces will result in less carbon emissions per tonne of steel produced when compared to the use of lesser quality coals. The quality of steelmaking coal is an important factor in the energy consumption and emissions performance of the steelmaking process. The high coke strength of EVR's coal helps to ensure stable and efficient blast furnace operations, resulting in lower CO_2 emissions per tonne of steel for its steelmaking customers. As steel producers look to reduce the GHG emissions intensity of their

production and potentially begin to face rising carbon prices, demand for the kind of steelmaking coal EVR produces will remain strong because of the low-carbon advantage it provides to steel producers.

EVR's steelmaking coal operations are assisted by access to low-carbon sources of electricity in BC.

In summary, the demand for EVR's high-quality steelmaking coal is likely to remain strong. The long-term annual average production capacity of 24 to 26 million metric tonnes of clean coal (Mmtcc) at EVR's steelmaking coal mines, combined with being low-GHG-intensity producers and assisted by low-carbon sources of electricity, supports a competitive position for coal mined from the Project into the future.

2.2 Need for and Purpose of the Project

The need for the Project arises from EVR's business strategy to supply the global demand for steelmaking coal (Section 2.1) and the fact that currently permitted reserves at FRO will be significantly depleted in the early 2030s. The Project is also needed to secure the long-term viability of EVR's assets, operations and business in the Elk Valley, including FRO's one-third portion of the $4.6 billion in economic contributions generated by coal mining activities in the Elk Valley (Deloitte 2022).

Based on the above needs, the purpose of the Project is to extend the lifespan of FRO to maintain global competitiveness of the Elk Valley operations, which is critical to the communities and residents within the Elk Valley and greater region. The four steelmaking coal operations employ approximately 5,000 people. The Project is needed to be in full production by the early 2030s to maintain existing production levels at FRO through to the early 2060s[5] and sustain jobs for the 1,500 employees already employed at FRO along with the thousands of indirect jobs associated with the Project. The FRX Project will secure the continuity of economic benefits shared by the regional,[6] provincial and national economies and different levels of Indigenous and non-Indigenous governments. The Project has been identified as the most environmentally, socially, technically and economically feasible alternative to support continued mining at FRO and establish leading practices in environmental stewardship and incorporation of Indigenous knowledge.

The Fording River Extension is essential to commence as early as possible, reaching full production by the early 2030s, and becoming the primary source of steelmaking coal for FRO by the late 2030s, maintaining the current average production rate of 9 Mmtcc/yr. The Project would produce an estimated 280 Mmtcc[7] over its operational life.

[5] FRO's annual production rate averages 9 Mmtcc; EVR's long-term annual average production capacity (all coal operations) is 24 to 26 Mmtcc.
[6] Including the Elk Valley communities of Elkford, Sparwood, Hosmer and Fernie, BC, and Crowsnest Pass, AB, along with surrounding smaller rural communities in these vicinities.
[7] Reported quantity includes Proven Mineral Reserves, Probable Mineral Reserves, and Inferred Mineral Resources within the constraining volume of the life-of-mine design. Mineral Resources are not Mineral Reserves and do not have demonstrated economic viability. Quantities expressed as clean coal tonnages (mtcc) are for discussion purposes only.

3.0 Alternatives to the Project

Alternatives to the Project are functionally different ways to meet the need and purpose for the Project and to extend the lifespan of FRO to maintain global competitiveness of the Elk Valley operations. The BC EAO Readiness Decision Letter (BC EAO 2023) advised Teck (now EVR) to provide clearer identification of alternatives to the Project, with transparent weighting and criteria for assessment of feasibility including how alternatives are evaluated against the Project purpose, including identification of new resource areas. Section 3.1 presents background on the evaluation of "No Project" and "New Mine" alternatives. Section 3.2 describes engagement conducted to identify and evaluate alternatives to the Project, the criteria the alternatives were evaluated against, the description and evaluation of alternatives to the Project and the mine development area selected for the Project.

3.1 Background on No Project and New Mine Scenarios

As part of early planning for the FRX Project, No Project and New Mine scenarios were evaluated:

- **No Project** - Not adding an additional source of steelmaking coal to extend the life of FRO.
- **New Mine** - Construction of new mine to replace FRO (new source of steelmaking coal, processing plant, and infrastructure in proximity to the new source).

Neither scenario would meet the need and purpose of the Project and therefore neither is a feasible alternative for sustaining mining at FRO. In summary, if no additional source of steelmaking coal at FRO is added to replace the existing production by the early 2030s, existing production would decline in the late 2020s and cease in the mid-2030s, followed by the closure of FRO.

The adverse consequences of the No Project scenario include:

- A progressive reduction in employment from now until closure, with all employment except the direct and indirect employment needed to support reclamation and closure coming to an end in the mid-2030s.
- A production decrease of approximately 35% (9 Mmtcc/yr), which would reduce overall competitiveness of the Elk Valley operations. This would reduce EVR's coal sales and market share and would impact the viability of the Elk Valley operations because coal from FRO/FRX is essential for blending to produce marketable products. The loss of production and associated revenue would impact EVR's ability to fulfill external commitments, including efforts towards sustainable mining and contributing to EVR's commitment to become a nature positive mining company.
- A reduction in economic benefits to local communities; employees and their families; the Ktunaxa Nation and other Indigenous Peoples; the regional, provincial and national economies; and different levels of government. Without the Project, economic contributions to suppliers and communities and tax contributions would be significantly reduced, including railway- and port-related expenditures and impacts to their respective workforces. Other positive effects that would otherwise flow if the Project proceeds (e.g., investment in community programming and infrastructure, positive impacts on quality of life associated with employment incomes) would also progressively decline during this timeframe.

- EVR would experience a reduction in its globally competitive position, market share and economic viability, and consequently EVR's contribution to the national trade balance (Teck's contribution accounted for nearly 85% of Canada's steelmaking coal export in 2023, of which FRO accounted for nearly 35%) would be reduced with FRO closure.
- While there would be no new contributions to environmental impacts in the Elk Valley from mining at FRO, industry contributions to other regional environmental and social programs would be reduced.

The adverse consequences of a New Mine include:

- EVR currently does not have sufficient understanding of other sources of steelmaking coal that would support development of a new mine to replace FRO by the early 2030s. The construction of a new mine to replace FRO would assume that there are sufficient data and information available to understand the quality and quantity of steelmaking coal in a new resource area as well as sufficient progress already made on required technical and engineering studies to support mine design and regulatory effects assessment and permitting processes.
- A new mine development area would require a large new disturbance footprint to accommodate a new processing plant and other supporting infrastructure required to operate a new mine (e.g., roads, railway, power lines). This option would likely not be economically feasible and would have technical challenges that outweigh its benefit relative to an extension to a current operation with existing infrastructure, such as FRO. A larger new disturbance would also likely result in an increase in potential environmental and social impacts.

The need to supply the global demand for steelmaking coal and maintain the viability of FRO over the long-term would not be met under a No Project or New Mine scenario. Consequently, the No Project and New Mine alternatives were rejected and alternative mining scenarios were evaluated through engagement to identify an improved Project that meets the need for the Project described in Section 2.2.

3.2 Engagement on Alternatives to the Project

As discussed in Section 1.2.5, Project-specific re-engagement with KNC and Yaq̓it ʔa·knuqƛi ʼit started in September 2023 with two workshops conducted in 2023 and another four workshops conducted in 2024, along with a series of smaller working meetings. In parallel to engagement on closing the gap (Section 1.2.5) and in preparation for re-engagement on the Project, Teck (now EVR) explored and shared information on the Project need and purpose (Section 2.2), potential alternatives to the Project (focus of this section) and potential alternative means for the Project (Section 4.0). From there, alternative and supplemental mine development areas were identified, and descriptions were presented to KNC and Yaq̓it ʔa·knuqƛi ʼit for further discussion and collaborative evaluation. This engagement is further described in Section 3.2.1.

3.2.1 Identification of Alternative and Supplemental Mine Development Areas

As noted above, alternative and supplemental mine development areas were presented to KNC and Yaq̓it ʔa·knuqɬi ’it for further discussion and collaborative evaluation. Alternative mine development areas and supplemental mine development areas are described as follows:

- Alternative mine development areas are locations where the Mist Mountain steelmaking coal formation is found, and where EVR holds either land ownership or coal tenure that have the potential to sustain FRO production and to fulfill the Project need and purpose.
- Supplemental mine development areas are smaller locations or developments where the Mist Mountain steelmaking coal formation is found, and where EVR holds either land ownership or coal tenure, including within existing operations. These areas could supplement, but not sustain, FRO production and on their own would not fulfill the need and purpose of the Project, but could potentially increase the flexibility with regard to implementing the proposed Project.

For each mine development area, relevant information was shared as required, which varied according to the plan’s maturity and the reserve/resource classification. The various potential mine development areas that were evaluated are described in Table 3.2-1 and shown in Figure 3.2-1.

Table 3.2-1: Alternative and Supplemental Mine Development Areas

Mine Development Area	Approximate Location	Approximate UTM Coordinates (Zone 11U)	Description
Alternative Mine Development Areas			
Elco	20 km north of FRO	649350m E, 5582180m N	• Mining would include pit development and mine rock placement adjacent and east of the Elk River and in the vicinity of Weary Creek. • Mining would be new disturbance, including in unimpacted drainages and high elevation grasslands, and would require new infrastructure including a new plant, main office and haul road network. • It is located north of FRO, in the upper Elk River forestry moratorium area. • EVR holds a 75% ownership of the Elco coal lease. • The mine plan is currently at the scoping level with limited information about geological and environmental conditions and Indigenous interests.
Tuxford	10 km northeast of FRO	651470m E, 5571690m N	• Mining would include pit development on Mount Tuxford and mine rock placement adjacent and east of the Elk River and/or adjacent to and west of the upper Fording River, upstream of existing operations and the Henretta Creek confluence. • Mining would be new disturbance, including in unimpacted drainages and high elevation grasslands, with limited opportunity for mine rock placement to overlap with existing disturbance. • It is located north of FRO in the upper Elk River forestry moratorium area. Other information about environmental conditions and Indigenous interests is limited. • There is currently no drilling information in this area. Completing necessary exploration to obtain adequate data to assess the potential resource quality and quantity would take several years. • There is not a mine plan associated with this area.

Table 3.2-1: Alternative and Supplemental Mine Development Areas

Mine Development Area	Approximate Location	Approximate UTM Coordinates (Zone 11U)	Description
Swift Ridge	West of and adjacent to FRO	648730m E, 5561860m N	• Mining is dependent on other phases of mining (e.g., GHO Cougar 8 and 9) proceeding in advance to create space to backfill. • The pits are within new disturbance, including in high elevation grasslands, with potential opportunities to backfill dependant on development of the Swift and Cougar phases. • There are opportunities to place mine rock on top of the existing Swift North disturbance where existing water treatment is in place (FRO-S and FRO-N). • The mine plan is currently at a conceptual level. Information about geological and environmental conditions and/or Indigenous interests would need to be updated/supplemented to support further planning.
Greenhills Ridge	West of FRO and Swift Ridge	647910m E, 5561040m N	• Mining is dependent on other phases of mining (e.g., GHO Cougar 8 and 9) proceeding in advance to create space to backfill. • The pits are within new disturbance, including in high elevation grasslands, with potential opportunities to backfill into Swift and Cougar phases. There are also opportunities to place mine rock on top of the existing Swift North disturbance where existing water treatment is in place (FRO-S and FRO-N). • There are known environmental challenges (e.g., capture groundwater in floodplain, lower mine rock close to the Elk River) and geotechnical constraints that require further investigation. • The mine plan is currently at a conceptual level.
Castle Mountain	Southeast and adjacent to FRO	656330m E, 5557887m N	• New disturbance, including in high elevation grasslands, is required for the pit shell and some of the mine rock placement. A large portion of the mine rock is planned for backfills into existing disturbed Eagle areas and pits and the planned pit itself. No mine rock would be directly placed in an unimpacted drainage. Mine rock placement is planned within Eagle or Kilmarnock areas where existing water treatment is in place (FRO-S and FRO-N) or in the planned pit. • The pit shell would intersect the Chauncey Creek watershed. • Data collection has substantively progressed to support Project design, understanding of potential Project–environment interactions, impact assessment and mitigation planning. • The design level is approaching the prefeasibility level with the preferred single configuration selected which will be further optimized.
Bare Mountain	12 km southeast of FRO	658080m E, 5552330m N	• Mining would include pit development on Bare Mountain and mine rock placement into the Chauncey Creek drainage and/or Todhunter and Ewin Creek drainages. Mining would be new disturbance, including in unimpacted drainages and high elevation grasslands. Other information about geological and environmental conditions and Indigenous interests is limited. • The mine plan is currently at a conceptual level.

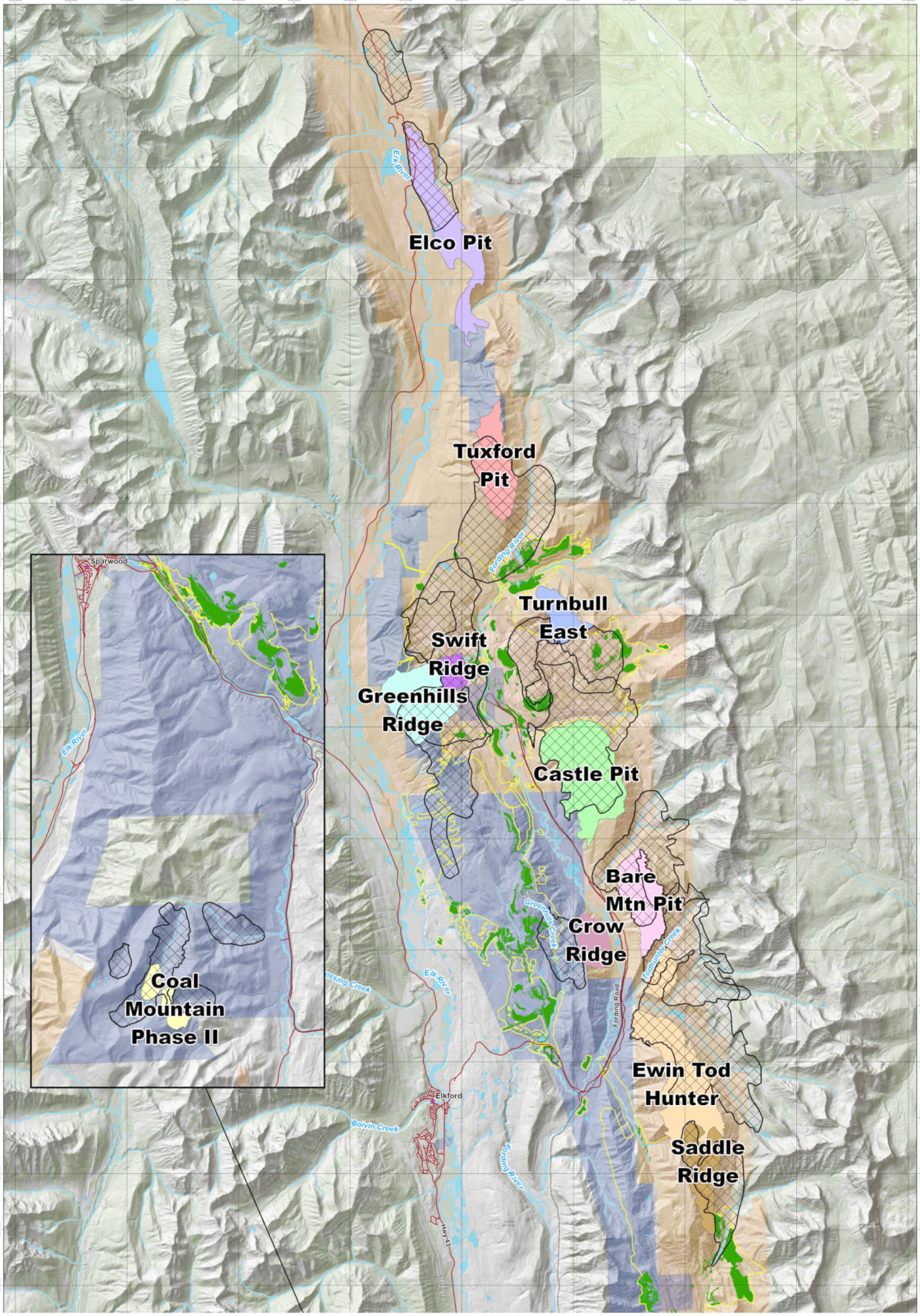
Table 3.2-1: Alternative and Supplemental Mine Development Areas

Mine Development Area	Approximate Location	Approximate UTM Coordinates (Zone 11U)	Description
Ewin Todhunter	20 km southeast of FRO	659830m E, 5544024m N	• Mining would include pit development on Imperial Ridge and mine rock placement into the Todhunter and Ewin Creek drainages. Mining would be new disturbance, including in unimpacted drainages and high elevation grasslands. • There are limited drilling data in this area. Other information about environmental conditions and/or Indigenous interests would need to be updated and/or supplemented. • The mine plan is currently at the conceptual level.
Crow Ridge	13 km south of FRO	655730m E, 5550420m N	• Mining would include pit development on Crow Ridge and mine rock placement into the Greenhills Creek drainage and/or adjacent to the upper Fording River floodplain downstream of the Chauncey Creek confluence. Mining would be new disturbance, including in unimpacted drainages and high elevation grasslands. Other information about geological and environmental conditions and Indigenous interests is limited. • The mine plan is currently at the conceptual level.
Saddle Ridge	20 km south of FRO	660820m E 5540120m N	• The area is adjacent to LCO. Mining would include pit development on Saddle Ridge and mine rock placement into the LCO Dry Creek and upper Line Creek drainages where existing water treatment is in place or planned to be in place (LCO-Dry Creek and West Line Creek). • The potential mining area is within mostly new disturbance, including in high elevation grasslands, with potential opportunities to backfill into planned Mount Michael pits. • Information about geological and environmental conditions and Indigenous interests would need to be updated and/or supplemented to support further planning. • The mine plan is currently at the scoping level with one configuration designed to illustrate pits and rock storage areas.
Coal Mountain 2	65 km south of FRO, near Sparwood, BC, and northwest of Coal Mountain mine	654460m E 5495000m N	• The area is adjacent to Coal Mountain mine, which has entered a care and maintenance phase. • Mining would utilize the Coal Mountain mine plant and include pit development on Martin Ridge and Wheeler Ridge, and mine rock placement into the Wheeler Creek and Snowslide Creek drainages. Mining would be new disturbance, including in unimpacted drainages and high elevation grasslands. While data collection had been substantively started, updated information would be needed to support further planning. • The mine plan is currently at the scoping level. Coal Mountain 2 was previously in the regulatory process, but the project was paused due to lack of economic viability identified in 2015 and formally withdrawn from the regulatory process in 2022.

Table 3.2-1: Alternative and Supplemental Mine Development Areas

Mine Development Area	Approximate Location	Approximate UTM Coordinates (Zone 11U)	Description
Supplemental Mine Development Areas			
Turnbull East	Northeast and adjacent to FRO	654430m E 5564940m N	• Mining would not begin before 2035. • The pits are within new disturbance, including in high elevation grasslands, with potential opportunities to backfill into FRO Eagle Pit where existing water treatment is in place (FRO-N), and the pit shell would intersect the Henretta Creek watershed. • The mine plan is currently at the scoping level with no preferred configuration selected. Additional data collection would be required to support further planning. • During the scoping phase of the Project, it was proposed that Castle Mountain and Turnbull East be developed in parallel. At that time, this was Teck's preferred alternative for the extension to FRO. Mining these areas in parallel was rejected based on early engagement feedback prior to the July 2021 DPD, which raised concerns around the potential for terrestrial cumulative effects (alpine grasslands, bighorn sheep), tributary management (Chauncey and Henretta creeks) and water quality.
Remaining Swift Permitted Coal	A permitted and an active mining area on the west side of FRO	649060m E 5561580m N	• A portion of the permitted Swift pits is currently not planned to be mined due to negative economics under current conditions and geotechnical challenges. • The pits are within permitted disturbance with potential opportunities to backfill into future Swift pits.
Eagle East 2	A permitted and an active mining area on the east side of FRO	655240m E 5563120m N	• A potential pushback of the existing Eagle Pit, currently named Eagle East 2, is being evaluated. The pit would be within existing disturbance with mine rock placement into the Eagle pits and on top of existing Eagle disturbance where existing water treatment is in place (FRO-S and FRO-N).

UTM = Universal Transverse Mercator; GHO = Greenhills Operations; FRO = Fording River Operations; FRO-N = Fording River Operations North; FRO-S = Fording River Operations South; DPD = Detailed Project Description; LCO = Line Creek Operations



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Figure 3.2-1: Mine Development Areas (NTS 082G/082J)

- Mine Rock Storage
- C-Permit Boundary
- EVR Lands (Fee Simple)
- Mineral Coal Tenure
- Reclaimed
- Ktunaxa Land Districts
- Roads
- Railway

N

DATE: 7/3/2025	MINE OPERATION: FORDING RIVER

Document Path: I:\CLIENTS\EVR\2025\CA0050291_7055\Mapping\03_DPD\CA0050291_7055_DPD_023_GIS_MineDevelopmentAreas.aprx

3.2.2 Collaborative Evaluation of Alternatives

Following the identification and characterization of alternative and supplemental mine development areas, key criteria proposed for use in evaluating alternatives to the Project were subsequently shared by KNC and Yaq̓it ʔa·knuqɬi ’it. KNC and Yaq̓it ʔa·knuqɬi ’it advised that the criteria were not viewed as binary and acknowledged that it was expected that no one project would meet all of the preferred conditions associated with each criteria; rather, the list was identified as a tool for comparing alternatives. EVR also shared criteria to support the collaborative evaluation of alternatives to the Project with KNC and Yaq̓it ʔa·knuqɬi ’it. EVR’s criteria are used for assessing feasibility. KNC, Yaq̓it ʔa·knuqɬi ’it, and EVR criteria are summarized in Table 3.2-2.

Table 3.2-2: Evaluation Criteria for Alternative and Supplemental Mine Development Areas

Group	Topic	Criteria
KNC and Yaq̓it ʔa·knuqɬi ’it	Area	• preference for areas that are already mine influenced
	Land, Culture and Access	• no disturbance to high elevation grasslands, wildlife corridors or bighorn sheep habitat • no development in the upper Elk River forestry moratorium area (north of FRO) • maintain the ability for Ktunaxa to be on the land • reclamation ability and timing (i.e., ability to start earlier versus waiting until the end of mine life)
	Water	• keep non-contact water clean • sufficient water availability • no further flow effects • no impacts to Elk and Fording River headwaters, intact watersheds • no further losses to fish habitat • no impact to cold temperature water to sustain WCT in future, with consideration given to climate change • preference for areas with higher assimilative capacity (however, preference is to keep non-contact water clean)
	People and Communities	• Project decisions can be made for 1.5 generations or less • employment opportunities in ways that Ktunaxa Nation want to be employed • proximity to Ktunaxa Nation communities, with consideration given to employment and access
	Design	• incremental and phased design with checkpoints so that mining can be slowed, paused or stopped, including planned compliance monitoring and future decision making • in-pit backfill • no pits extending below river/creek elevation • minimal drilling needed to gain additional data • consideration given to dust
	Infrastructure	• use existing roads and infrastructure
EVR	Impacts[a]	• result in proportionally lower disturbance and mitigable impacts, where there is confidence in mitigation and existing mitigation can be utilized (e.g., existing water treatment facilities)
	Commercial Viability	• established reserve status • strip ratio, haul distance, competitiveness • the ability to generate expected benefits
	Sustain FRO	• sustain and extend the operations at FRO, including meeting production timelines, utilization of existing infrastructure and consideration given to timing and the continuity of employment and economic benefits as indicated by the Project need and purpose

a) Given overlap with Ktunaxa criteria, the impacts criteria, as defined by EVR, were not assessed separately.

KNC = Ktunaxa Nation Council; WCT = Westslope Cutthroat Trout; FRO = Fording River Operations; EVR = EVR Operations Limited

Working with KNC and Yaq̓it ʔa·knuqɬi ’it, the criteria were applied to potential alternative and supplemental mine development areas. Through discussion, quantitative evaluation, including weighting of the individual criteria, was identified as unnecessary for decision making following the generation of the criteria. Instead, a qualitative comparative approach was used to support the evaluation.

Table 3.2-3 summarizes the evaluation of the alternative and supplemental mine development areas using the criteria and qualitative approach to selecting the best mine development area to proceed into assessment, as determined through the workshops.

Table 3.2-3: Evaluation of Alternative and Supplemental Mine Development Areas through Engagement

Mine Development Area	Status After Workshop 4	Status After Workshop 6	Reason for Removal
Elco	Removed from further consideration	–	• north of FRO, in the upper Elk River forestry moratorium area • far from existing FRO infrastructure
Tuxford	Removed from further consideration	–	• north of FRO, in the upper Elk River forestry moratorium area • current lack of drilling information requires several years of data gathering, resulting in a start date that is too late for continuity at FRO
Swift Ridge	Under consideration	Removed from further consideration	• mining is dependent on other phases of mining (e.g., GHO Cougar 8 and 9) proceeding in advance to create space to backfill, as the economic feasibility is dependent on haul distance (start date would be late for continuity at FRO) • incorporated into conceptual design for potential future Greenhills Ridge
Greenhills Ridge	Under consideration	Removed from further consideration	• mining is dependent on other phases of mining (e.g., GHO Cougar 8 and 9) proceeding in advance to create space to backfill, as the economic feasibility is dependent on haul distance (start date would be late for continuity at FRO) • while the mining pit area is preferred as it is a pushback of existing pit walls, there are environmental challenges with mine rock placement (e.g., capture groundwater in floodplain, lower mine rock close to the Elk River) and geotechnical constraints • Greenhills Ridge, inclusive of GHO Cougar Phases 8/9, is not large enough to sustain both FRO and GHO and does not meet the Project need and purpose
Castle Mountain	Under consideration	Under consideration	n/a[(a)]
Bare Mountain	Removed from further consideration	–	• potential impacts to unimpacted tributaries and high elevation grasslands
Ewin Todhunter	Removed from further consideration	–	• potential impacts to unimpacted tributaries • current lack of drilling information requires several years of data gathering, resulting in a start date that is too late for continuity at FRO • far from existing FRO infrastructure
Crow Ridge	Removed from further consideration	–	• far from existing FRO infrastructure • water quality challenges with known oxidation
Saddle Ridge	Removed from further consideration	–	• far from existing FRO infrastructure
Coal Mountain 2	Removed from further consideration	–	• far from existing FRO infrastructure • previously identified as not economically feasible

Table 3.2-3: Evaluation of Alternative and Supplemental Mine Development Areas through Engagement

Mine Development Area	Status After Workshop 4	Status After Workshop 6	Reason for Removal
Turnbull East	Under consideration	Removed from further consideration	• area not large enough to sustain FRO on its own • earliest start date approximately 2035 (late for continuity at FRO) • high amount of high elevation grassland disturbance per overall production compared to Castle Mountain
Remaining Swift Permitted Coal	Removed from further consideration	–	• area not large enough to sustain FRO on its own • under the right conditions in the future, it could be evaluated for potential as a supplemental mine development area
Eagle East 2	Under consideration	Removed from further consideration	• area not large enough to sustain FRO on its own • area continues to be evaluated for future development as a supplemental development area

a) Castle Mountain, as with all of the other alternative and supplemental mine development areas with new disturbance, cannot avoid interaction with the evaluation criteria, including the avoidance of high elevation grasslands.

– = previously removed from consideration, not discussed in subsequent workshops; n/a = not applicable

FRO = Fording River Operations; GHO = Greenhills Operations; GHO = Greenhills Operations

Table 3.2-4 summarizes EVR's application of key criteria to compare alternative and supplemental mine development areas to the Castle Mountain mine development area based on those identified in Table 3.2-2. Mine development areas were compared as either neutral, less optimal or better when screened against the Castle Mountain area. EVR considered the economic feasibility with respect to criteria for commercial viability. For an alternative to be feasible from a commercial viability perspective, it had to meet reserve status and (in the case where reserve status was met) could be designed to be economically viable under reasonably foreseeable economic conditions taking into consideration factors such as strip ratio and haul distance. EVR considered technical feasibility of the alternative based on its ability to extend the lifespan of FRO by maintaining current production starting in the early 2030s and otherwise meet the need and purpose for the Project, taking into consideration factors such as the time required to gather information to support Project planning and other constraints such as dependency other phases of mining occurring in advance. EVR's evaluation of each alternative's feasibility is summarized under the criteria identified as "Commercial Viability" and "Sustain FRO" in Table 3.2-4.

Table 3.2-4: Evaluation of Alternative and Supplemental Mine Development Areas Against Key Criteria Compared to Castle Mountain

Mine Development Area	Minimizing New Disturbance	Minimizing Impact to High Elevation Grasslands	Avoiding Upper Fording River North of FRO and Upper Elk River	Access and Confidence in Land Use (Ktunaxa Being Ktunaxa on the Land)	Water Quality Impacted vs. Un-impacted Drainages	Extent of New Disturbance Required for Additional Drilling	Ability to Use Existing FRO Infrastructure	Commercial Viability	Sustain FRO
Elco	🟡	⚪	🟡	🟡	🟡	⚪	🟡	NF	NF
Tuxford	🟡	⚪	🟡	🟡	🟡	🟡	⚪	NF	NF
Swift Ridge	⚪	⚪	⚪	⚪	⚪	⚪	⚪	NF	NF
Greenhills Ridge	⚪	⚪	⚪	⚪	⚪	⚪	⚪	NF	NF
Bare Mountain	🟡	⚪	⚪	🟡	🟡	⚪	⚪	NF	NF
Ewin Todhunter	🟡	⚪	⚪	🟡	🟡	🟡	🟡	NF	NF
Crow Ridge	🟡	⚪	⚪	🟡	🟡	⚪	🟡	NF	NF
Saddle Ridge	🟡	⚪	⚪	🟡	⚪	⚪	🟡	NF	NF
Coal Mountain 2	🟡	⚪	⚪	🟡	🟡	⚪	🟡	NF	NF
Turnbull East	⚪	⚪	⚪	⚪	⚪	⚪	⚪	NF	NF
Remaining Swift Permitted Coal	🟢	🟢	⚪	🟢	🟢	⚪	⚪	NF	NF
Eagle East 2	🟢	🟢	⚪	🟢	🟢	🟢	⚪	NF	NF

⚪ = neutral; 🟡 = less optimal; 🟢 = better; NF = not feasible on the basis that the alternative would not meet the need and purpose of the Project, including meeting production targets by the early 2030s; FRO = Fording River Operations

Through the evaluation it was determined that:

- All areas could be sized or staged such that the life of the Project area is limited to within 1.5 generational time frames.
- Areas close to existing or planned disturbances can leverage those disturbances to minimize new disturbance. Turnbull East, Swift Ridge, Greenhills Ridge and Castle Mountain offer similar opportunities to utilize existing disturbance. Mining in the smaller remaining Swift permitted coal area and Eagle East 2 areas would have no new disturbance, while mining in the remaining areas would all result in new disturbance.
- All areas have some interaction with high elevation grasslands except for the smaller remaining Swift permitted coal and Eagle East 2 areas, which have no new disturbance.
- Other than the Turnbull East, Swift Ridge, Greenhills Ridge, Castle Mountain, Saddle Ridge, remaining Swift permitted coal and Eagle East 2 areas, the alternative and supplemental mine development areas have the potential to impact water quality in previously unimpacted drainages due to the placement of mine rock. The Elco and Tuxford areas may impact the upper Elk River. Tuxford may also impact the upper Fording River upstream of current operations.

- Based on input from KNC and Yaq̓it ʔa·knuqɬi ’it, areas that limit access to undisturbed areas have a greater overall impact on land use and areas closer to existing or planned disturbance result in a lower confidence from KNC and Yaq̓it ʔa·knuqɬi ’it for use as they are already perceived as impacted or have limitations to access. Except for the smaller remaining Swift permitted coal and Eagle East 2 areas, which have no new disturbance, and Turnbull East where access is currently limited by existing operations, all areas have similar potential to impact land access and confidence.
- Some areas have outstanding uncertainty regarding coal type and quality information due to limited drilling. Crow Ridge has known oxidation and Coal Mountain 2 has more semi-hard and semi-soft coal types, both resulting in lower marketable price due to decreased coal quality. The remaining Swift permitted coal area does not have positive economics under current conditions due to unfavourable strip ratio and haul distance.
- Proximity to the existing FRO infrastructure is important to minimizing additional disturbance. The Tuxford, Turnbull East, Swift Ridge, Greenhills Ridge, Castle Mountain, Bare Mountain, Swift, and Eagle areas are close enough to FRO for the use of existing FRO infrastructure. The farther an area is from existing operations, additional auxiliary infrastructure, such as a new plant, main office, rail access and haul road network, is proportionally required.
- Through engagement, Yaq̓it ʔa·knuqɬi ’it has shown interest in continuing to ensure better environmental standards are implemented, including with Eagle East 2 as a potential future development area. While this area would not fulfill the need and purpose for the Project, it could be used to supplement FRO production; however, additional drilling and design work is required to determine its viability. EVR has plans to continue exploration within this area to improve geotechnical data and will continue collaboration with Yaq̓it ʔa·knuqɬi ’it, which would be done in a separate regulatory permitting process, outside of the FRX Project.
- Each mine development area differs in the level of information available regarding geological and environmental conditions, Indigenous interests, economic value and capability to sustain FRO production, with most requiring years of extensive investigation before EVR would be in a position to develop feasible mine plans. Additionally, some of the alternative mine development areas have constraints, such as contingency on other mining areas proceeding first or distance from existing infrastructure that would make the Project unfeasible in the context of the present need and purpose for the Project. While combining some mine development areas may meet production requirements, no combination other than Castle Mountain is able to meet the schedule requirements to maintain production by the early 2030s based on the level of uncertainty associated with available information and/or identified constraints such as distance from existing infrastructure and/or dependencies on other mining proceeding. Except for the Castle Mountain area, all mine plans considered for the alternative and supplemental development areas are currently at scoping level or lower. Collectively, this means that none of these areas would close the FRO production gap in time (by 2030) and are therefore not technically or economically feasible on the timeline needed for the present Project.

Given that no alternatives besides the Castle Mountain area were identified as feasible, no weighting of the other criteria were applied to the other identified alternatives.

3.2.3 Proposed Development Area

Through the application of the criteria developed to evaluate the alternative and supplemental mine development areas, no areas other than the Castle Mountain mining area can meet the Project need and purpose due to uncertainty associated with available information (e.g., known coal quality) and/or identified constraints such as distance from existing infrastructure and/or dependencies on other mining proceeding. Other factors such as the level of new disturbance that would be required and the potential impacts to water quality within previously unimpacted drainages further reinforce that mining the Castle Mountain area is the most environmentally, technically and economically feasible alternative that fulfills the Project need and purpose.

As a result, the Castle Mountain area has been carried forward into discussions on alternative means, as outlined in Section 4.0. While the Castle Mountain area was carried forward, it was expressed by Yaq̓it ʔa·knuqɬi ’it and KNC that the mine design size from the July 2021 DPD would not be acceptable and would need to be revised. Through engagement, Yaq̓it ʔa·knuqɬi ’it has shared that they want to maintain the option of assessing the other mine development areas in the future, and in the case of this Project, continue to work collaboratively to find the best configuration at the Castle Mountain mining area while still meeting the Project’s need and purpose.

4.0 Alternative Means of Carrying Out the Project

As directed in the Readiness Decision Letter (BC EAO 2023), through engagement with KNC and Yaq̓it ʔa·knuqɬi ’it, EVR is to provide clearer identification of alternative means of carrying out the Project, with transparent weighting and criteria for assessment of their feasibility. Alternative means were to consider options such as changes to siting, staging, timing and technologies.

The primary components of alternative means needed for the Project are those required to determine mine pit and mine rock storage area configurations, along with supporting infrastructure and reclamation plans. Additional components summarized below would also be required in some capacity for the Project.

Teck (now EVR) engaged with KNC and Yaq̓it ʔa·knuqɬi ’it on alternative means through a series of workshops and field visits. The sections below outline the alternative means for the primary components with considerations of factors such as technical, environmental, sociocultural and economic (Sections 4.0 to 4.9). Alternatives for the staging of the Project are described in Section 4.10. The resource area and scope for the Project based on the selected means is then summarized in Section 4.11.

The evaluation of alternative means included two steps. First, the feasibility of each identified alternative was assessed. For the purpose of this evaluation, an alternative must meet all of the following to be considered feasible:

- Support the Project’s need and purpose as described in Section 2.2.
- Be technically viable, meaning that it can achieve the purpose of the alternative (e.g., a water quality management alternative must be able to support the achievement of water quality objectives) while meeting geotechnical, safety, and other technical constraints, considering technology maturity/readiness and other currently available information.
- Be economically viable under reasonably foreseeable economic conditions.

Based on these feasibility criteria, each alternative was determined to have one of following feasibility status categories:

- **Feasible** - An alternative has been evaluated to meet all of the feasibility criteria based on current information.
- **Not feasible** - An alternative does not meet at least one of the feasibility criteria.

When there is more than one feasible alternative, each was then qualitatively evaluated using the following selection criteria:

- Environmental and sociocultural - disturbance area, including amount of disturbance in previously unimpacted watersheds, and impacts to environmental values of importance, Indigenous rights and ability to support social benefits.
- Economic - cost, revenue (including effects on production) and economic uncertainty.
- Technical - current technical understanding (including consideration of technology maturity and experience), technical/safety risks and opportunities, and ease of implementation.

Current technical understanding is weighted higher than the other selection criteria. That is, an alternative is not selected when there is insufficient understanding on its effectiveness and how it can be implemented within the Project setting. However, all other selection criteria are weighted equally. Using these criteria, advantages and disadvantages of each alternative were identified. These advantages and disadvantages were qualitatively assessed, with a narrative rationale provided in the evaluation regarding the reason for selection or rejection of alternatives.

Each alternative can have one of the following selection status categories:

- **Selected** - The alternative is selected to be included as part of the proposed Project.
- **Not selected** - The alternative is not selected to be included as part of the proposed Project.

Alternatives determined to be **not feasible** were not selected for the proposed Project. When there is more than one feasible alternative, the objective was to select alternatives where advantages outweigh the disadvantages considering the selection criteria. Where appropriate or advantageous for the overall Project, more than one feasible alternative may have been selected (e.g., multiple mine rock storage areas).

4.1 FRX Pit

This section describes the Project pit shell (i.e., the maximum extent of the pit) and the rationale for its selection. This section has been updated from the provincial and federal IPD documents, and July 2021 DPD after engagement with KNC and Yaq̓it ʔa·knuqƛi ’it following the Readiness Decision. It summarizes the assessment conducted to select the pit shell for the Project, taking into consideration geotechnical, geological, environmental, social and economic constraints as well as compatibility with Ktunaxa values, accounting for existing conditions.

The pit shell has been designed to achieve the Project’s purpose of extending FRO’s lifespan while accounting for geotechnical constraints and minimizing, to the extent feasible, direct impact to the Chauncey Creek drainage and other environmental values. As described in Section 5.2.4, geology and geotechnical conditions within the Project vicinity constrain the pit shell design. These constraints are due to the Ewin Pass Thrust Fault’s relatively central location within the mountain and the steep westerly dipping strata near the height of land between the Fording River drainage to the west and Chauncey Creek drainage to the east. Specifically, the eastern edge of the pit cannot be in the region of geological and geotechnical risks depicted in Figure 5.2-3,

Early Engagement Feedback Note

Early engagement on the Project included feedback expressing concerns about potential Project-related effects related to the size and duration of the Project. As described throughout Section 4.0, the selected pit shell has been refined since the July 2021 DPD to address a number of concerns identified through engagement. These refinements have included:

- decreasing the size of the pit
- reducing recoverable coal from 357 to 280 Mmtcc
- reducing overall mine rock volume by more than 1 billion bank cubic metres
- shortening the Project life span to 34 years
- reducing pit depth to stay above the Fording River elevation
- pulling the pit wall back where possible (i.e., near Chauncey Creek and Castle Mountain West Unnamed Stream 7)
- incorporating potential locations for saturated rock fills in the north

where the fault or the steeply dipping strata would make the pit unstable and unfeasible. Design constraints due to the geological and geotechnical conditions include:

- **Safety** - Near the height of land, the steeply dipping layers of rock are held in place by the material below and to the west of the height of land. A pit directly west of the height of land would mine through the material holding up the height of land. A pit in this area would not meet adequate factors of safety.
- **Economics** - To avoid the above-mentioned geotechnical constraints, the pit wall would need to be placed well west of the height of land, creating additional hazards from overhead catchments, substantially reducing the size of the pit and resulting in lower production rates, limited backfill opportunities and longer haul distances.

These constraints, in addition to social and environmental factors, were considered in developing and evaluating mining and pit shell alternatives, as described below.

Underground Mining

Underground mining poses significant challenges and was rejected as it cannot meet the need and purpose of the Project. The feasibility of two underground mining methods were studied: longwall and room and pillar. Feasibility is limited by the following factors, among others:

- **Total coal and production rate** - A potential underground mine would have a very low production rate (about 0.7 Mmtcc/yr) and very low total recoverable coal (17 Mmtcc[8]), as only four of the seams meet initial screening of underground mining requirements, such as thickness and steepness.
- **Geotechnical uncertainty** - Underground mining poses additional geotechnical challenges, and the geology and structure play a significant role in the safe and efficient execution of underground mining.
- **Safety** - Underground mining introduces additional safety considerations (e.g., ventilation, coal dust explosion, water inundation, loss of access, roof and ground control, roof failures and rock bursts).
- **Costs** - Underground mining has a higher cost per clean tonne than current operations.

Based on these challenges, underground mining is not feasible to meeting the Project need and purpose.

Open-Pit Mining

EVR evaluated the following pit shell alternatives for the Project:

1) a pit shell that assumes active placement of mine rock into the Chauncey Creek drainage
2) a pit shell that avoids all high elevation grasslands and bighorn sheep winter range
3) a pit shell that avoids all disturbance to the Chauncey Creek drainage
4) a pit shell that minimizes disturbance to the Chauncey Creek drainage
5) a pit shell that balances the purpose of the Project with environmental and geotechnical constraints and extends the life of FRO by approximately 40 years

[8] Reported quantity includes Proven Mineral Reserves, Probable Mineral Reserves, and Inferred Mineral Resources within the constraining volume of the life-of-mine design. Mineral Resources are not Mineral Reserves and do not have demonstrated economic viability. Quantities expressed as clean coal tonnages (mtcc) are for discussion purposes only.

6) a pit shell that balances the purpose of the Project with environmental and geotechnical constraints, incorporating feedback from KNC and Yaq̓it ʔa·knuqƛi ’it regarding size and duration of the Project

7) a pit shell based on recovery of the most coal

The evaluation of these mining alternatives is presented in Table 4.1-1.

Representative pit shell configurations were evaluated for the following environmental, social and economic considerations related to the size and shape of a pit shell:

- possible removal of portions of the Chauncey Creek drainage area
- impacts related to castover and fly rock entering the Chauncey Creek drainage area
- avoiding the placement of mined rock into the Chauncey Creek drainage area
- possible removal of high elevation grasslands and wintering range for bighorn sheep (including contribution to potential cumulative effects associated with impacts to these habitats)
- operational and closure options:
  - maximizing in-pit backfill and utilization of existing disturbance
  - design integration of SRFs and submerged mined rock
  - utilization of existing water treatment infrastructure and avoiding unimpacted drainages
  - see associated Project components in following sections
- mine life sized to support generational decision making and support predevelopment investment, maintaining a competitive and consistent cost structure
- pit sized to support rates that utilize existing infrastructure and assets, supporting a competitive cost structure and existing workforce
- constraints associated with geological and geotechnical conditions; not all pit shapes or sizes would meet the minimum geotechnical requirements for safety and stability (Figure 5.2-3 and additional discussion in Section 5.2.4)

Pit shell considerations and status are summarized in Table 4.1-1.

Table 4.1-1: Project Pit Shell Evaluation of Alternatives

Pit Shell Alternative[a]	Evaluation of Alternative(s)	Status
Alternative 1 **A pit shell that assumes active placement of mine rock into the Chauncey Creek drainage**	A pit shell that assumes active placement of mine rock into the Chauncey Creek drainage area offers a number of economic and technical advantages, primarily: • **Alternate mine plan possibilities** - Placing mine rock in Chauncey Creek would allow the mine plan to commence at the south end of Castle Mountain by providing necessary mine rock placement capacity. This capacity is not otherwise available, and utilizing it would result in shorter haul distances, reduced costs, quicker initial predevelopment activities and earlier access to lower strip ratio coal, which would have a positive economic benefit. • **Mined rock haulage** - Placing mined rock into the Chauncey Creek drainage could shorten haul distances, a major factor in mine economics. This reduced haul distance could be applied to the proposed mine plan, allowing mined rock from higher elevation areas on Castle Mountain to be hauled and/or dozer-pushed directly east. Additionally, the pit in the south could utilize the shorter haulage directly to the Chauncey Creek drainage. However, placement of mine rock into the Chauncey Creek drainage would result in additional disturbance and potential adverse effects on water quality in an area of importance to Ktunaxa Nation. Considering feedback from KNC and Yaq̓it ʔa·knuqƛi ’it and through the application of the BC Policy for Mitigating Impacts on Environmental Values and EVR’s mitigation hierarchy[b] the environmental and sociocultural disadvantages of this alternative outweigh the economic and technical advantages.	***Feasible*** This alternative meets all the feasibility criteria. ***Not Selected*** This alternative was not selected due to feedback from KNC and Yaq̓it ʔa·knuqƛi ’it and through the application of the BC Policy for Mitigating Impacts on Environmental Values and EVR’s mitigation hierarchy.[b] (Considered but not presented in the IPD documents and July 2021 DPD, new for the Revised DPD)
Alternative 2 **A pit shell that avoids all high elevation grasslands and bighorn sheep winter range** **Alternative 3** **A pit shell that avoids all disturbance to the Chauncey Creek drainage** **Alternative 4** **A pit shell that minimizes disturbance to the Chauncey Creek drainage**	Alternatives 2, 3 and 4 would involve a very similar pit design due to geotechnical constraints. Thus, they were evaluated together as a combined alternative of a pit shell that partially avoids high elevation grasslands, bighorn sheep winter range and/or disturbance to the Chauncey Creek drainage. To meet the geotechnical constraints, the pit would need to be located quite far west from the height of land, due to the mass of horizontally bedded rock that must be left in place below the height of land to achieve a stable eastern pit wall. This would result in a long, narrow pit along the western edge of the Project area. This combined alternative would offer the environmental advantage of partially avoiding high elevation grasslands, bighorn sheep winter range and/or disturbance to the Chauncey Creek drainage. However, it would also result in the following economic, technical and environmental disadvantages: • The pit would have less recoverable coal and, due to its narrow geometry, would not support a production rate of 9 Mmtcc/yr. Thus, it would require the development of other new pits to support FRO production in order to meet the need and purpose for steelmaking coal and maintain economically viable operations, leading to additional disturbance and environmental impacts to VCs in other areas. • Leaving a large catchment above the mining area introduces additional overhead safety hazards such as avalanche, rock fall and water flows that would need to be mitigated.	***Not Feasible*** This alternative is not feasible on its own without the development of other pit areas needed to meet the Project’s need and purpose (Section 3.2.2). (Consistent with IPD documents and July 2021 DPD)

Table 4.1-1: Project Pit Shell Evaluation of Alternatives

Pit Shell Alternative[a]	Evaluation of Alternative(s)	Status
Alternative 5 **A pit shell that balances the purpose of the Project with environmental and geotechnical constraints and extends the life of FRO by approximately 40 years**	A pit shell designed to meet the geotechnical constraint by placing the eastern pit wall east of the height of land if feasible. A sufficient mass of steeply bedded and faulted material near the height of land would have to be removed so that the pit wall is stable, thereby extending the pit into the upper portions of the Chauncey Creek drainage. This alternative was previously selected and proposed for the Project in the provincial and federal IPD documents and in the July 2021 DPD (with refinements between IPD documents and the July 2021 DPD to reduce the pit shell and associated footprint, as documented in the July 2021 DPD). This pit shell alternative would have approximately 360 Mmtcc[9] of coal and extend the life of FRO, including sustainability employment and other economic benefits, by approximately 40 years at a production rate of 9 Mmtcc/yr. It would include some direct impacts to a portion of the high elevation grasslands, bighorn sheep winter range and the Chauncey Creek drainage. These impacts and their planned mitigations could be assessed through the environmental assessment process. However, feedback from KNC and Yaq̓it ʔa·knuqƛi ’it is that the total Project life of this alternative is too long to support at this time. Thus, this alternative was not selected.	***Feasible*** This alternative meets all the feasibility criteria. ***Not Selected*** This alternative was not selected as feedback from KNC and Yaq̓it ʔa·knuqƛi ’it is that the total Project life of this alternative is too long to support at this time. (Updated for the Revised DPD)
Alternative 6 **A pit shell that balances the purpose of the Project with environmental and geotechnical constraints incorporating feedback from KNC and Yaq̓it ʔa·knuqƛi ’it regarding the size and duration of the Project**	This alternative has been refined from Alternative 5 since the publication of the July 2021 DPD to reduce the pit shell size, representing an effort to further reduce the overall footprint and amount of new disturbance. Similar to Alternative 5, this alternative meets the geotechnical constraint by placing the eastern pit wall east of the height of land. A sufficient mass of steeply bedded and faulted material near the height of land must be removed so that the pit wall is stable, thereby extending the pit into portions of the Chauncey Creek drainage. This pit shell alternative would have approximately 280 Mmtcc[9] of recoverable coal, with a Project life span of approximately 34 years, thereby extending the life of FRO by approximately 26 years after permitted reserves are depleted. It supports a production rate of 9 Mmtcc/yr, and the smaller Project size is easier for Ktunaxa Nation to support, enabling future generations to participate in decision making on the future of mining and additional development and better aligning with the Ktunaxa principle of not taking more than needed. This alternative would include some direct impacts to a portion of high elevation grasslands, bighorn sheep winter range and the Chauncey Creek drainage; however, the impacts have been reduced with the smaller Project. These impacts and their planned mitigations will be assessed through the environmental assessment process and documented in the IS/A. Based on the above considerations, this alternative was deemed more advantageous and preferrable to Alternative 5 and thus has been selected as part of the proposed Project.	***Feasible*** This alternative meets all the feasibility criteria. ***Selected*** This alternative has been selected as the Project pit shell (Figure 4.1-1). The selected pit shell would extend the mine life of FRO through to the early 2060s while overcoming the geological and geotechnical constraints (Figure 5.2-3 and discussion above and in Sections 4.10 and 4.2). A number of constraints have driven selection of the pit shell. The selected pit shell is reduced compared to the pit shell selected in the July 2021 DPD. (Refined from Alternative 5 for the Revised DPD)

[9] Reported quantity includes Proven Mineral Reserves, Probable Mineral Reserves, and Inferred Mineral Resources within the constraining volume of the life-of-mine design. Mineral Resources are not Mineral Reserves and do not have demonstrated economic viability. Quantities expressed as clean coal tonnages (mtcc) are for discussion purposes only.

Table 4.1-1: Project Pit Shell Evaluation of Alternatives

Pit Shell Alternative[a]	Evaluation of Alternative(s)	Status
Alternative 7 **A pit shell based on recovery of the most coal**	A pit shell that provides the recovery of the most coal was evaluated for comparison. This alternative would place the eastern edge of the pit near Chauncey Creek. It would result in a large pit and would extend the life of FRO by over 70 years at a production rate of 9 Mmtcc/yr. While this alternative would maximize the economic benefit of the Project, it would result in greater direct impacts to high elevation grasslands, bighorn sheep winter range and the Chauncey Creek drainage compared to Alternative 6. These environmental and sociocultural disadvantages outweigh the economic advantages for this alternative.	***Feasible*** This alternative meets all the feasibility criteria. ***Not Selected*** This alternative was not selected because, compared to Alternative 6, it would result in greater direct impacts to high elevation grasslands, bighorn sheep winter range and the Chauncey Creek drainage. (Consistent with IPD documents and July 2021 DPD)

a) Note that alternatives numbering has been updated and does not correspond to the numbering in the July 2021 DPD.
b) Refer to Section 10.0 for further information on EVR's mitigation hierarchy.

DPD = Detailed Project Description; IPD = Initial Project Description; Mmtcc = million metric tonnes of clean coal; VC = valued component; FRO = Fording River Operations; EVR = EVR Operations Limited; IS/A=Impact Statement/Application; KNC = Ktunaxa Nation Council.

Figure 4.1-1 shows the boundary of the pit shell based on the selected alternative and the development of the FRX Pit described in Section 5.3.2. As mentioned above, the selected pit shell has been refined since the publication of the July 2021 DPD based on the outcomes of engagement and applying the Ktunaxa Nation criteria, including:

- removing areas of the pit with less certain economics, thereby reducing recoverable coal from approximately 360 Mmtcc[10] in the July 2021 DPD to 280 Mmtcc[10] for the selected pit shell, leading to a smaller pit shell and a shorter Project life span of 34 years
- reducing pit depth to stay above the Fording River elevation to reduce potential interactions between the pit water and the Fording River
- in the Chauncey Creek drainage, pulling the pit wall back, where possible, based on updated geotechnical information to reduce potential effects on flow and high elevation grasslands
- incorporating potential locations for SRF water treatment in the north and south halves of the FRX Pit (see Section 4.4.2 on water treatment alternatives)
- identifying potential locations for water storage in the north half of the FRX mine design to support the use of mine-influenced water, where possible, to reduce use of non-mine-influenced water, improve water treatment efficiency, and minimize potential impacts to environmental flow needs
- removing the area of the pit which overlapped with the catchment boundary of Castle Mountain West Unnamed Stream 7

A comparison between the selected pit shell depth and the pit shell depth previously proposed for the July 2021 DPD is provided in Figure 4.1-2.

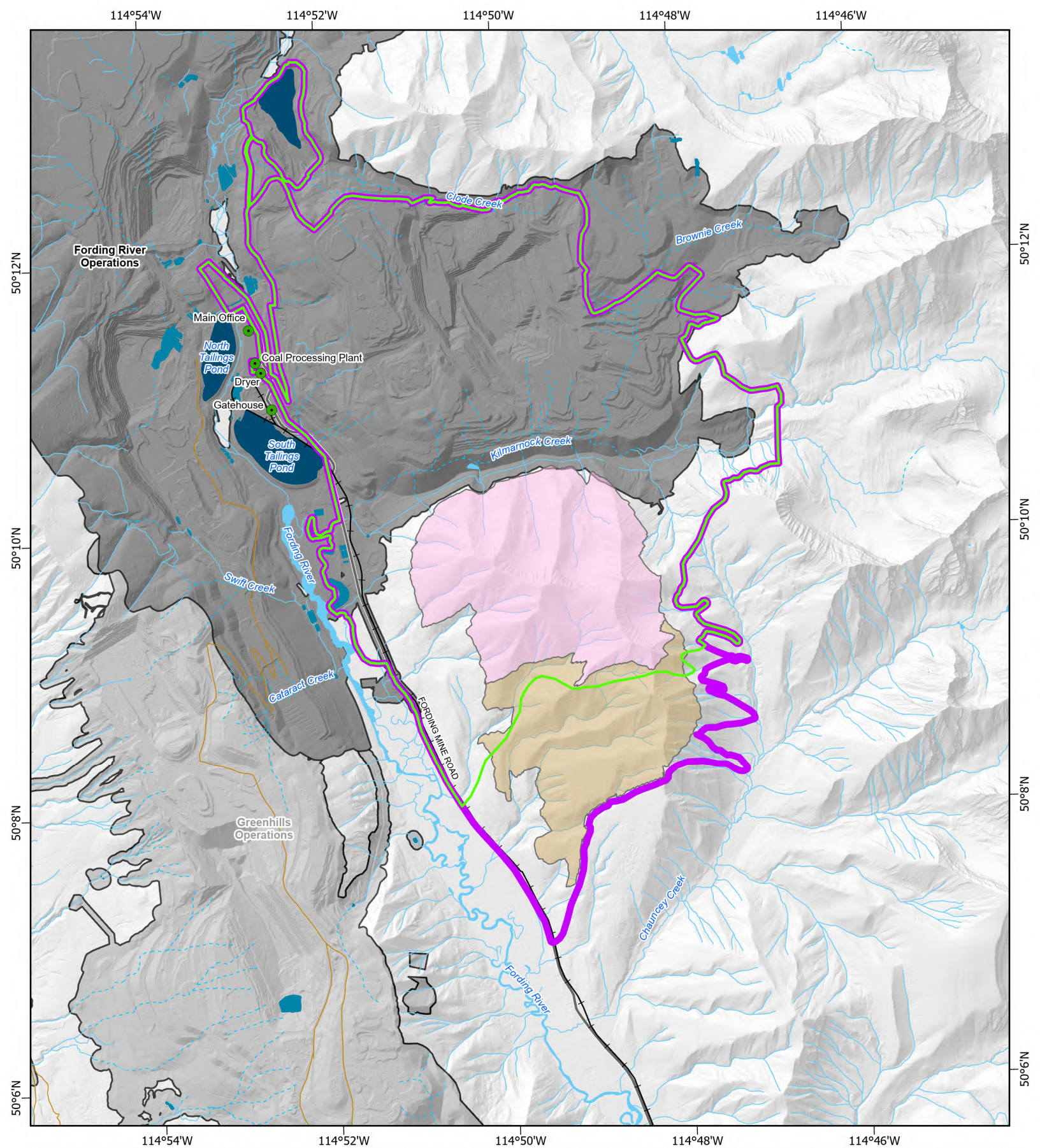
The pit shell and mine design may be further refined through the assessment process to incorporate, for example:

- results of ongoing geological and geotechnical investigation and geotechnical stability analysis of pit and mine rock areas
- implementation of a castover management plan to reduce the potential for fly rock in the Chauncey Creek watershed and refining the Project footprint associated with this activity to support assessment of the Project (enhanced castover management is being advanced at GHO and is demonstrating success in reducing the amount of castover material; such learnings would be applied to future iterations of the Project footprint)
- details regarding predevelopment activities including soil salvage, timber harvest, electrical power supply, access roads and earthworks to establish the mining area and infrastructure required for operations
- details associated with implementing water management (including treatment, decant points, water movement during operations and closure, and preserving optionality to support emerging treatment opportunities)
- planning for closure and reclamation (Section 4.9)

[10] Reported quantity includes Proven Mineral Reserves, Probable Mineral Reserves, and Inferred Mineral Resources within the constraining volume of the life-of-mine design. Mineral Resources are not Mineral Reserves and do not have demonstrated economic viability. Quantities expressed as clean coal tonnages (mtcc) are for discussion purposes only.

- refinement of the coal production schedule and details around coal blending, strip ratio, equipment productivity, mining equipment requirements and mine rock areas that include pit progressive backfilling (Section 4.2)
- details for implementing mitigation measures to address adverse effects, supplement positive effects and to address feedback received through the assessment process
- integration of further input from KNC and Yaq̓it ʔa·knuqƛi ’it

EVR will continue planning the implementation of technically and economically feasible means to avoid and minimize adverse impacts to Chauncey Creek. The identified mitigations will be captured in a management plan to be developed for the Chauncey Creek watershed. EVR has proposed that this plan be developed in collaboration with the KNC and Yaq̓it ʔa·knuqƛi ’it and involve engagement with federal and provincial regulators.



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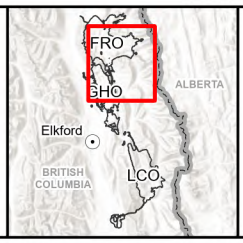


Figure 4.1-1: FRX Pit Boundary (NTS 082J/02)

- Existing Facility
- Railway
- Road - Paved
- Road - Unpaved
- Surface Flow Watercourse
- Subsurface Flow Watercourse
- FRO C-3 Permitted Mine Area
- GHO C-137 Permitted Mine Area
- Pit Boundary - Stage 1
- Pit Boundary - Stage 2
- Project Footprint - Stage 1
- Project Footprint - Stage 1 + Stage 2
- Tailings Pond
- Waste Water/Sediment Pond
- Waterbody

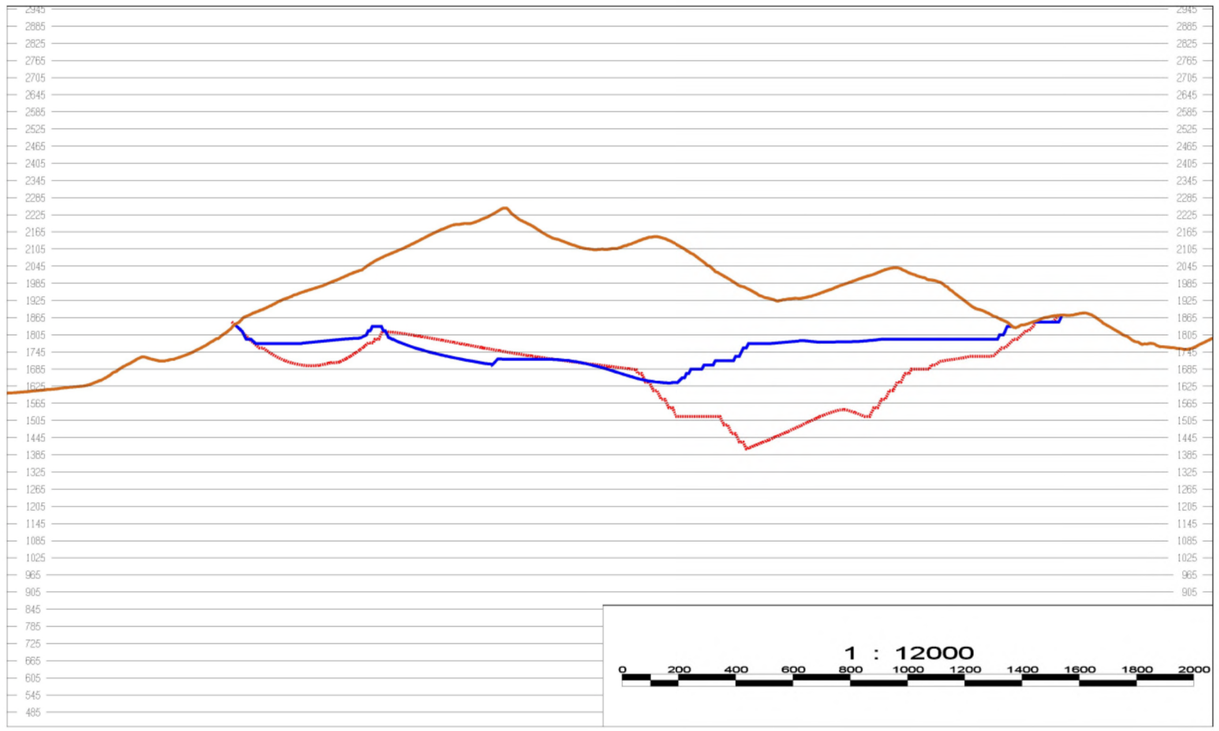
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1 km

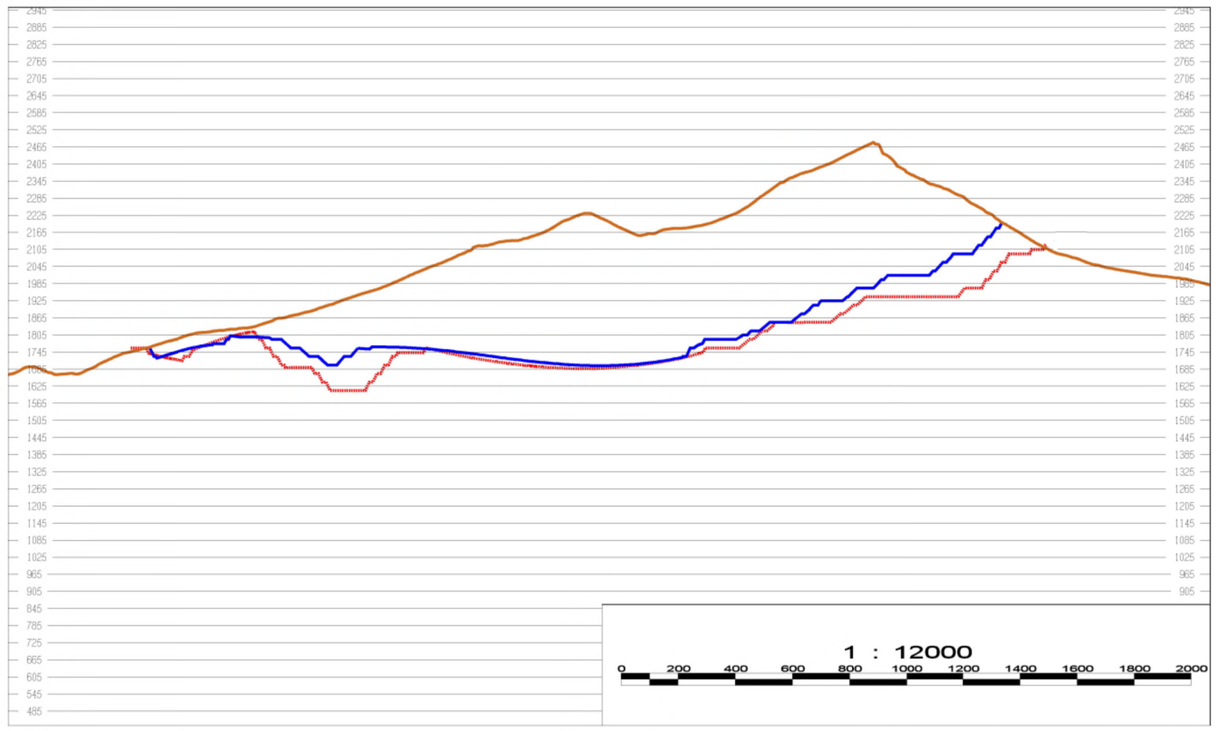
DATE: 4/30/2025	MINE OPERATION: FORDING RIVER
SCALE: 1:65,000	COORDINATE SYSTEM: NAD 1983 UTM Zone 11N

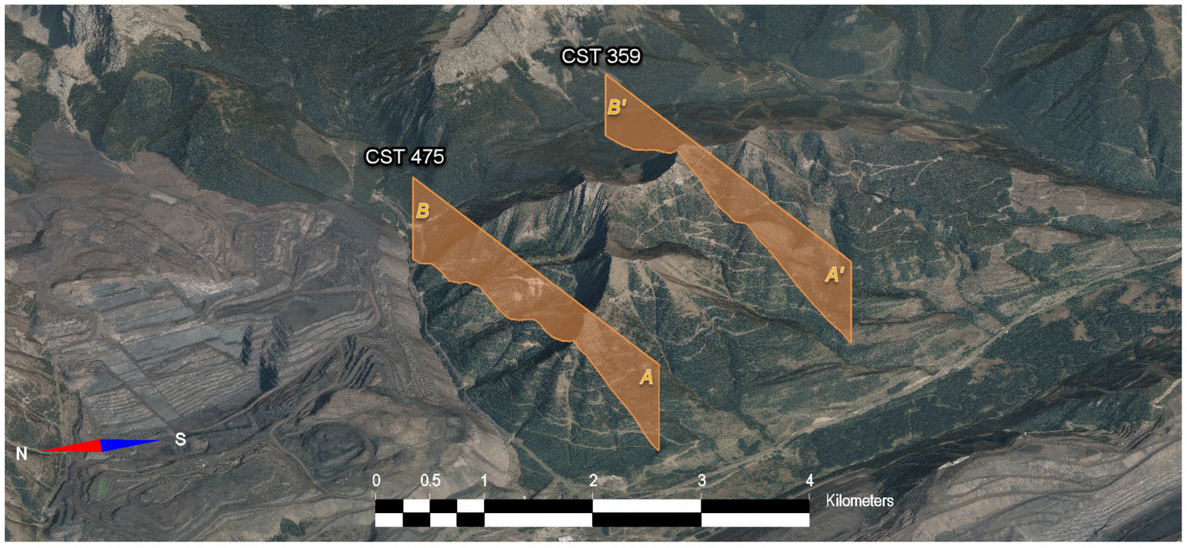
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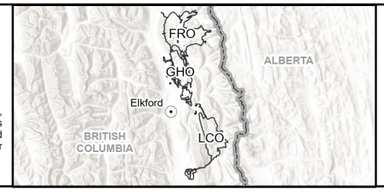


Figure 4.1-2: Comparison Between the Selected Pit Boundary and the 2021 Detailed Project Description Pit Boundary

Existing Surface
Project Pit Depth
2021 Detailed Project Description Pit Depth

DATE: 4/23/2025

MINE OPERATION: FORDING RIVER

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4.2 Mining Direction and Technique

This section of the Revised DPD provides a description and rationale for the Project mining direction and technique (Table 4.2-1).

In an unconstrained mine development scenario, the ideal direction of mining is from south to north, which would increase the economics of the Project. This is due to the lower strip ratio coal in the south with easier access and predevelopment and shorter haul distances; however, this plan would require direct mine rock placement into the Chauncey Creek drainage and/or adjacent to the Fording River.

To avoid placement of mine rock in Chauncey Creek or the Fording River, mining in the FRX Pit (Figure 4.1-1) would start in the north and progress to the south. With mining direction influenced by haul distance, initial mine rock placement in the Kilmarnock Creek drainage and then into the pre-existing Eagle disturbance is required before pit backfill space is available within the Project footprint. The mining technique focuses on progressive backfilling into previously disturbed areas when appropriate, reducing the need for new disturbance associated with mine rock storage.

The FRX Pit would be developed as a conventional open pit with progressive backfilling, which is a hybrid between the two techniques presented in the provincial and federal IPD documents. A mine plan showing both the mining direction and technique is presented in Section 5.3.

Table 4.2-1: Project Mining Direction and Technique Alternatives

Mining Component Alternative	Evaluation of Alternative	Status
Mining direction The mine could be opened in one area and then progress towards other areas.	Mining of the FRX Pit could start from the south and progress to the north, or to start from the north and progress to the south. The available locations for mine rock storage influence the mining direction. The south-to-north direction is economically favourable due to the lower strip ratio in the south and potentially shorter haul distances; however, it would require mine rock placement in the Chauncey Creek drainage and/or adjacent to the Fording River. With the decision not to place mine rock in the Chauncey Creek drainage or the Fording River Valley bottom (Sections 4.10 and 4.3), the south-to-north mining direction was not selected. The north-to-south mining direction, while economically less favourable, would avoid mine rock placement in Chauncey Creek and Fording River and was therefore selected for the Project.	***Feasible*** Both mining direction alternatives meet all feasibility criteria. ***Selected*** The north-to-south mining direction was selected to avoid mine rock placement in the Chauncey Creek drainage area and the Fording River Valley bottom. The mine would start in the north and progress to the south. (Consistent with IPD documents and July 2021 DPD)
Mining technique Several approaches were considered for the development of the FRX mine. All techniques are based around open-pit mining with mine rock stored in other previously mined pits, ex-pit or within pits developed in the FRX mining area. ***Conventional open-pit mining***	Placement of mine rock for the Project is constrained by the Fording River to the west and the Chauncey Creek watershed to the east. To start mining the north end, mine rock needs to be hauled farther north toward the Kilmarnock Creek drainage area and the previously mined Eagle Pit. Haul distance, a predominant factor influencing the economics of the mine, needs to be balanced with other considerations including, but not limited to, geotechnical stability of the placed mine rock and ability to preserve access to continue mining the pit.	***Feasible*** Conventional open-pit mining with progressive backfilling meets all feasibility criteria. ***Selected*** The pit would be developed as a conventional open pit with progressive backfilling. By placing mine rock within the active pit as progressive backfilling on the north side

Table 4.2-1: Project Mining Direction and Technique Alternatives

Mining Component Alternative	Evaluation of Alternative	Status
Typical coal mines in the Elk Valley involve mining a series of interconnected open pits. Mine rock is taken out of the pit and placed in a different location, either ex-pit or in another previously mined pit. Minimizing haul distance needs to be balanced with other mine operation considerations. ***Progressive backfilling*** Open-pit mining can also progress by depositing mine rock within the active pit being mined once a pit of sufficient size is developed. Mine rock is moved within the pit from one side to the other. This approach can be referred to as progressive backfilling.	Conventional open-pit mining is applicable where a pit is being established to safely and efficiently extract coal. Progressive backfilling becomes a potential option when a pit is of a sufficient size such that backfilling mine rock within the currently active pit is a safe and efficient option. It can encounter operational complexities as blasting and coal extraction occurs on one side of the pit while mine rock is being placed on the opposite side. Given the planned size and constraints of the pit, it becomes a candidate for incorporating progressive backfilling technique's part way through the mine life. This can reduce the overall disturbance area by placing mine rock within the active pit as progressive backfilling on the north side while mining proceeds to the south and can also benefit progressive reclamation. This may include some bottom-up mine rock placement, creating potential opportunities for source control as outlined in Table 4.4-1.	while mining proceeds to the south, the selected mining technique would reduce the overall disturbance area compared to conventional open pit alone. (Consistent with IPD documents and July 2021 DPD)

DPD = Detailed Project Description; IPD = Initial Project Description; FRX = Fording River Extension.

4.3 Mine Rock Storage Areas

This section of the Revised DPD provides description and rationale for Project mine rock storage locations (Table 4.3-1).

Mine rock is rock that has been removed to allow coal to be mined. Locations for the Project's mine rock storage areas have been identified based on the following key considerations:

- avoiding, minimizing or reducing disturbance of watersheds that currently have no direct mining impacts
- prioritizing, where appropriate, backfilling of pits and previously disturbed areas
- placement and landform design to improve the closure configuration and ecosystem function of the legacy Eagle area
- minimizing haul distance, which would reduce associated fuel consumption and GHG emissions from mobile equipment and help sustain a competitive operation

Three locations were selected for mine rock storage for the Project: the Kilmarnock Creek drainage (which already contains some mine rock within the current boundary of the C-3 Permit issued under the *Mines Act* [C-3 Permit]), the Eagle Pit (currently being mined as part of the existing FRO) and the FRX Pit once areas become available for progressive backfilling. Avoidance of new disturbance in the Kilmarnock Creek drainage was evaluated and determined to not be feasible due to the limited backfill storage capacity (in both Eagle Pit and FRX Pit), completion timing of Eagle Pit and haul costs. However, the mine plan has been refined since the provincial and federal IPD documents were published to reduce the footprint of the proposed mine rock storage area in the unimpacted areas of the Kilmarnock Creek drainage. Total mined rock has also been reduced by more than 1 billion bank cubic metres (Bbcm), a 24% reduction in overall mine rock volume, since publication of the July 2021 DPD given overall refinements to the FRX Pit configuration.

Locations of the mine rock storage areas are shown in Figure 4.3-1. Details for the mine rock storage areas will continue to be developed and refined as the assessment of the Project proceeds, including:

- refining the volume and timing of mine rock placement within each mine rock storage area
- configuration of top-down and bottom-up placement to manage footprint and support progressive reclamation
- optimization and utilization of existing water treatment infrastructure
- maintaining optionality for more specific water quality management concepts (e.g., source control)
- incorporating geomorphic concepts to build to closure (i.e., land use planning) with collaboration from KNC, Yaq̓it ʔa·knuqƛi ’it, and other potentially affected Indigenous Peoples

Additional information on the mine rock volume and timing, water quality management concepts and geomorphic concepts will be presented in the IS/A.

Table 4.3-1: Project Mine Rock Storage Location Alternatives

Mine Rock Storage Location Alternative	Evaluation of Alternative	Status
Locate mine rock in the Fording River Valley bottom along the west side of the Project The Project could place mine rock in the Fording River Valley bottom along the west side of the Project.	The Fording River Valley runs from north to south along the western side of Castle Mountain. Locating a mine rock storage area into the Fording River Valley bottom would lead to the following advantages: • short haul distances for mine rock • stronger Project economics However, this alternative would also lead to the following disadvantages: • safety challenges placing mine rock above the Fording Mine Road and the railway • water management challenges collecting water from the mine rock storage area • water management challenges if mine rock were located on the flood plain • additional terrestrial and aquatic disturbance These disadvantages were evaluated to have outweighed the advantages, thus this alternative was not selected.	***Feasible*** This alternative meets all the feasibility criteria. ***Not Selected*** The Project will not locate a mine rock storage area in the Fording River Valley bottom along the west side of the Project due to safety and water management challenges and additional terrestrial and aquatic disturbance. Note, however, that smaller volumes of mine rock may be used within the Project footprint (e.g., roads, accessing, predevelopment). (Consistent with IPD documents and July 2021 DPD)
Locate mine rock in the Chauncey Creek drainage The Project could place mine rock in the Chauncey Creek drainage.	The Chauncey Creek drainage runs along the eastern and southern side of Castle Mountain. Chauncey Creek is identified as a high value tributary in the region and limiting impacts to this drainage is important to the Ktunaxa Nation, other potentially affected Indigenous Peoples, regulatory agencies and other interested parties. Locating a mine rock storage area in the Chauncey Creek drainage could lead to the following advantages: • short haul distances for mine rock • stronger Project economics However, this alternative would also lead to the following disadvantages: • water management challenges collecting water from the mine rock storage area • possible water quality impacts to a high value tributary • additional terrestrial and aquatic disturbance These disadvantages were evaluated to outweigh the advantages; thus, this alternative was not selected.	***Feasible*** This alternative meets all the feasibility criteria. ***Not Selected*** The Project will not locate a mine rock storage area in the Chauncey Creek drainage due to water management and water quality challenges and additional terrestrial and aquatic disturbance. Note, however, that some amount of material may enter the drainage area due to castover and fly rock. (Consistent with IPD documents and July 2021 DPD)

Table 4.3-1: Project Mine Rock Storage Location Alternatives

Mine Rock Storage Location Alternative	Evaluation of Alternative	Status
Locate mine rock in and on the Kilmarnock Creek drainage The Project could place mine rock in the Kilmarnock Creek drainage, both within areas previously occupied by mine rock and in previously undisturbed areas.	The Kilmarnock Creek drainage runs from east to west along the north side of Castle Mountain, with upper Kilmarnock being non-fish bearing. The Kilmarnock Creek drainage contains historical and active FRO mine rock storage areas. The upper reaches of the drainage do not have direct impacts from mining such as mine rock storage, surface disturbance, surface water interactions or alteration of groundwater. Feedback received during early engagement indicated that the upper reaches are important for hunting, recreational and traditional use as well as for wildlife movement. Locating a mine rock storage area in the Kilmarnock Creek drainage could lead to the following advantages: • short haul distances for mine rock early in the Project life; distances would increase later in the Project life • creation of a causeway to allow access from the Project to backfill the mined-out Eagle Pit at FRO • water management linking to existing water management systems including planned treatment at the FRO South Active Water Treatment Facility • flexibility for land use planning and geomorphic design by linking the closure landscape at Eagle Pit and Castle Mountain • additional groundcover to re-establish wetter ecosystems like mesic forests, balancing a potential surplus of dry forests to plant and focusing on grassland and brushland ecosystems However, this alternative would also lead to the following disadvantages: • some (low) additional terrestrial and aquatic disturbance • interference with the Kilmarnock Creek Clean Water Diversion • restriction to access by land users and wildlife to the upper reaches until phased access changes or there are progressive reclamation opportunities These impacts and their planned mitigations will be assessed through the environmental assessment process and documented in the IS/A. This alternative is more favourable than placing mine rock in the Fording River Valley bottom or Chauncey Creek drainage, and enables mine rock placement in the mined-out Eagle Pit. Thus, it is selected for the Project.	***Feasible*** This alternative meets all the feasibility criteria. ***Selected*** The Project will locate a mine rock storage area in the Kilmarnock Creek drainage, as it is necessary to create access for mine rock placement in the mined-out Eagle Pit. Note that the footprint of the Kilmarnock mine rock storage area has been refined from that proposed in the provincial IPD and federal IPD documents and the July 2021 DPD. The refinements result in less mine rock disturbance in the undisturbed portion of the Kilmarnock Creek drainage and more mine rock on existing mine rock disturbance, as discussed in Section 5.1.20. (Consistent with July 2021 DPD)

Table 4.3-1: Project Mine Rock Storage Location Alternatives

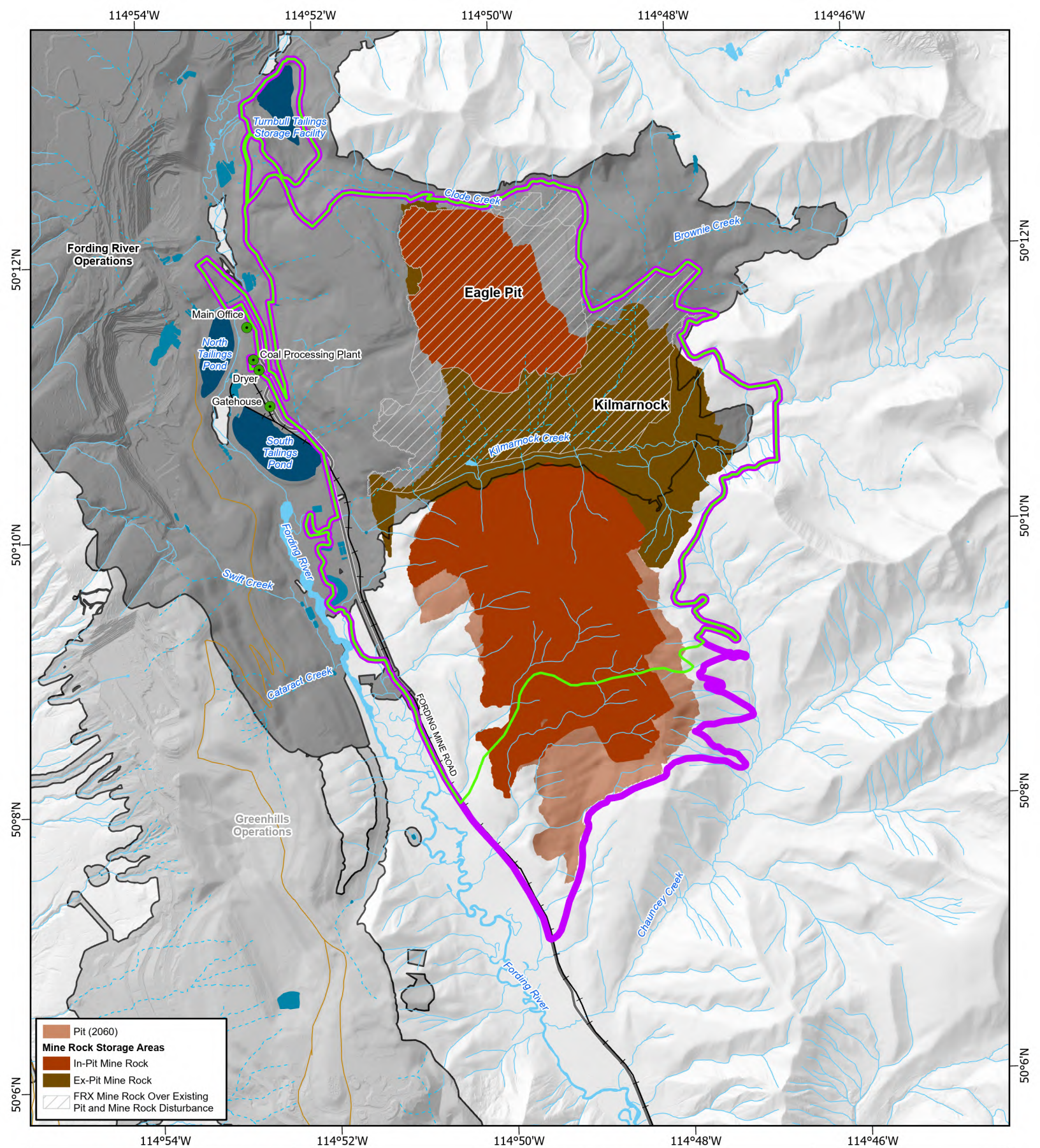
Mine Rock Storage Location Alternative	Evaluation of Alternative	Status
Locate mine rock in and on the existing Eagle Pit The Project could place a mine rock storage area in the Eagle Pit at FRO to backfill the pit and to construct a closure landscape on top of the backfilled pit once mining in that area is complete.	The existing Eagle Pit is directly across the Kilmarnock Creek drainage from the Project and is situated partially within the Kilmarnock Creek and Clode Creek drainages. Due to mining activities, this area is already disturbed with limited amounts of reclamation in place. Eagle Pit could be accessed directly from the Project if a mine rock causeway crossed the Kilmarnock Creek mine rock storage area. Locating a Project mine rock storage area in the Eagle Pit could lead to the following advantages: • moderate haul distances for mine rock early in the Project • backfilling Eagle Pit • placement and landform design to improve the closure configuration and ecosystem function of the legacy Eagle area • water management linking to existing water management systems including planned treatment at the FRO-S-AWTF and SRFs within the Clode Creek drainage • no new terrestrial or aquatic disturbance as mine rock would be placed within an existing pit • improved flexibility for land use planning and geomorphic design of the mine rock storage area toward closure It is noted that EVR is engaged in the planning and/or ongoing execution of reclamation projects that may interact with some parts of the proposed footprint for locating mine rock in and on the existing Eagle Pit. Overall, this alternative provides a favourable location for mine rock placement at the beginning of the Project, especially before the space in the north side of FRX Pit becomes available for progressive backfilling.	***Feasible*** This alternative meets all the feasibility criteria. ***Selected*** The Project will locate a mine rock storage area as backfill in the existing disturbed Eagle Pit, as a favourable location for mine rock placement especially before space becomes available for progressive backfilling at the FRX Pit. The Project will consider constructing landforms on top of the backfilled pit. The Project will plan a cohesive and integrated reclamation plan for the entire Project footprint. (Consistent with July 2021 DPD)

Table 4.3-1: Project Mine Rock Storage Location Alternatives

Mine Rock Storage Location Alternative	Evaluation of Alternative	Status
Locate mine rock in the FRX Pit The Project could place mine rock in the FRX Pit to backfill the pit once space becomes available.	The FRX Pit could be backfilled with mine rock once there is sufficient space.[(a)] Locating a mine rock storage area in the FRX Pit could lead to the following advantages: • short haul distances for mine rock • backfilling of the FRX Pit • water management linking to Project water management systems that would be designed into the mine as it is constructed; a portion of the water in contact with mine rock backfilled into the FRX Pit would report to the Kilmarnock Creek drainage, which is already targeted for water treatment at the FRO South Active Water Treatment Facility (Section 5.3.4); additional water treatment alternatives are described in Section 4.4.2 • no additional physical disturbance associated with mine rock storage relative to the disturbance associated with the pit • improved flexibility for land use planning and geomorphic design of the mine rock storage area towards closure • two locations that would allow development of an SRF Placing mine rock as FRX Pit backfill is considered the most favourable alternative after space becomes available for progressive backfilling.	***Feasible*** This alternative meets all the feasibility criteria. ***Selected*** The Project will locate a mine rock storage area in the FRX Pit to backfill the pit. (Consistent with July 2021 DPD)

a) The Project's early construction activities would involve moving quantities of mine rock and placing it in temporary locations to be mined through later (e.g., fill below a haul road in steep terrain). These sites would be part of the overall water management plan for the Project but are not identified as mine rock storage in the DPD.

IPD = Initial Project Description; DPD = Detailed Project Description; FRO-S-AWTF = Fording River Operations South Active Water Treatment Facility; SRF = saturated rock fill; FRO = Fording River Operations; IS/A = Impact Statement/Application; EVR = EVR Operations Limited; FRX = Fording River Extension.



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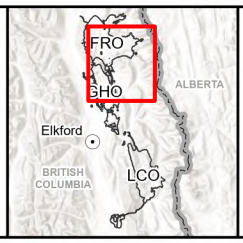


Figure 4.3-1: Locations of Project Mine Rock Storage Areas (NTS 082J/02)

- Existing Facility
- Railway
- Road - Paved
- Road - Unpaved
- Surface Flow Watercourse
- Subsurface Flow Watercourse
- FRO C-3 Permitted Mine Area
- GHO C-137 Permitted Mine Area
- Project Footprint - Stage 1
- Project Footprint - Stage 1 + Stage 2
- Tailings Pond
- Waste Water/Sediment Pond
- Waterbody

1 km

N

DATE: 4/30/2025	MINE OPERATION: FORDING RIVER
SCALE: 1:65,000	COORDINATE SYSTEM: NAD 1983 UTM Zone 11N

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4.4 Water Quality Source Control and Treatment

EVR has made significant progress implementing the EVWQP and has constructed 77,500 m^3/d of treatment capacity from proven technologies of active water treatment facilities (AWTFs) and SRFs, a four-fold increase in treatment capacity since 2020. As of the end of 2024, an additional five major water treatment facilities or expansions were under construction. EVR is working to achieve treatment capacity of 150 million litres per day across its water treatment program by 2027. These proven technologies (Technology Readiness Level [TRL] 7 or higher) will be relied on in the water quality mitigation plan for the Project. Similarly, nitrate source control has been effectively implemented across EVR's operations in the Elk Valley. The Project will incorporate optionality for new source control technologies as studies are advanced and should they become plausible for large-scale application in the Elk Valley (e.g., TRL7 or greater).

Early Engagement Feedback Note

Early engagement on the Project included feedback expressing concerns about potential Project-related water quality impacts, including selenium. Some feedback indicated preference for proven technologies over new or emerging technologies. Some feedback saw use of proven technologies as "business as usual" and indicated a preference for pursuit of new and emerging technologies. This section (including Sections 4.4.1 and 4.4.2) describes the Project plan to assess a conservative case based on proven technology while committing to adopting new technologies as they become technically and economically viable.

A description of water quality source control and treatment plans for the Project is provided in Sections 4.4.1 and 4.4.2, respectively. Overall, the Project's conceptual source control and treatment plans are based on several key concepts:

- Integrate with FRO and regional water management plans and infrastructure.
- Plan for water management early in Project design efforts.
- Avoid or reduce impacts to water.
- Manage water so that discharge(s) from the Project contributes to meeting EVWQP objectives and meets relevant permit conditions.
- Adopt a best achievable technology approach (BC MECCS 2021).

Mining generates large quantities of leftover rock that contains naturally occurring substances such as selenium, an element that is essential for human and animal health in small amounts. Water from both precipitation and runoff flows through these rock piles and carries selenium and other substances, such as nitrate, into the local watershed. The constituents of interest vary among mine sites, depending on the local composition of the rock and water that are in contact. In the Elk Valley, the primary constituents of interest for which source control technologies are being tested include selenium, nitrate, sulphate and nickel.

Additional water management planning information for the Project is described in Section 5.3.4, whereas this section focuses on the water quality source control and treatment components that may be incorporated into the water management plan. The alternatives for water quality source control and treatment in this section are the same as those presented in the original provincial and federal IPD documents. In response to feedback, additional information on the development and evaluation of the water quality source control and treatment alternatives was included in the July 2021 DPD. Additional updates to reflect advancement of water quality treatment planning and implementation in the Elk Valley are also included in this Revised DPD.

4.4.1 Water Quality Source Control

The approach and rationale for incorporating water quality source control into the Project is described in this section. Water quality source control refers to measures designed to inhibit the release of water quality constituents of interest into the receiving environment.

The Project's approach to water quality source control includes implementing technologies that meet guidance for best achievable technology (BC MECCS 2021) and operational measures to prevent or reduce release of constituents of interest to the receiving environment. For example, the Project will adopt nitrate source control as outlined in Table 4.4-1.

EVR continues to evaluate source control technologies from both operational and implementation perspectives. The Project is designed to preserve optionality for new source control technologies as studies are advanced and should they become feasible for application in the Elk Valley and the FRX Project. It is also recognized that the TRL of source control technologies currently under investigation may not be advanced enough (e.g., TRL7 or greater) to include in the assessment timeline. To accommodate new information and technologies that may be available for deployment in the future, the Project will continue to evaluate and, if appropriate, incorporate new source control options into the Project plan with input from the Technology Readiness Assessment Guidance document (BC EMLI and BC MECCS 2022) established under the BC Southeast Coal Emerging Technologies Working Group. This working group comprises provincial agencies, KNC and EVR, and is helping to inform which technologies can be relied upon for planning and assessment and regulatory applications as well as mine development and operations. This plan is consistent with EVR's commitment to continuous improvement and aligns with EVR's EVWQP, which includes adjustments to the implementation plan as uncertainties are resolved and improved ways to manage water quality are identified.

A description of the rationale for the selection of water quality source control alternatives is presented in Table 4.4-1.

Table 4.4-1 Project Water Quality Source Control Alternatives

Water Quality Source Control Alternative	Evaluation of Alternative	Status
Source control for nitrate The Project could incorporate efforts to reduce nitrate entering water. One source of nitrate in water is nitrate-rich explosives coming into contact with water.	EVR has developed a process to line ammonium nitrate/fuel oil (ANFO) and emulsion explosives in blast holes where feasible and is implementing the practice at all operations. The use of liners for nitrate source control is expected to have a positive effect on water quality and could contribute to a reduction in future water treatment requirements for nitrate. Fording River Operations has managed nitrate through ongoing implementation of appropriate explosives disposal and spill management practices (Teck 2014).	***Feasible*** Source control for nitrate is feasible and is being implemented at all EVR operations. ***Selected*** The Project will adopt source control for nitrate. (Consistent with IPD documents and July 2021 DPD)
Source control for selenium and sulphate The Project could incorporate efforts to reduce selenium and/or sulphates entering water. Selenium and sulphate can enter water when mine rock is exposed to air (specifically oxygen) and water. Water can contact the mine rock through precipitation, runoff, surface water flow or groundwater flow. Air can contact the mine rock by passing through spaces between the rocks.	One source control technique for selenium and sulphate is to construct the mine rock storage area from the bottom up in smaller lifts relative to standard end dumping methods or by using other alternative construction methods, which would impede air and water transport through the mine rock. As discussed in Section 4.2 (Table 4.2-1), bottom-up mine rock placement could be implemented in a conventional open pit with progressive backfilling. Although there are technical challenges to implement bottom-up mine rock placement in some areas of the pit, it is technically viable in some other areas of the pit.	***Feasible*** Bottom-up mine rock placement is feasible in some areas of the pit. ***Selected*** The Project would implement bottom-up mine rock placement where feasible as a source control for selenium and sulphate. (Updated for the Revised DPD)
	Other source control alternatives being investigated to reduce or eliminate the passage of air and/or water through mine rock include: • adding fine-textured layers between lifts of run-of-mine rock or application of compacted berms on the outer perimeter of a bottom-up mine rock storage area; fine tailings, CCFR or other materials, including amendments, could be used to further impede air and water moving through the mine rock to limit oxidation and potentially sequester/reduce/immobilize selenium and sulphate • co-mingling of the above materials with mine rock before placement to further enhance these mechanisms • constraining mine rock storage area designs within existing topography and other surrounding factors to limit oxygen ingress • capping the mine rock storage area (either by low-permeability or store-and-release cover systems); this can minimize water infiltration and air/oxygen movement through the mine rock Each of these options also has the potential to act as further source control for nitrate and potentially other constituents.	***Not Feasible*** These source control technologies under investigation are not advanced enough to be considered technically viable within the Project's assessment timeline and are therefore not selected for the Project. The Project plan is to maintain optionality for implementing these source control technologies for selenium and sulphate as they are identified as effective and feasible for application in the Elk Valley. EVR continues to evaluate the best options for source control for selenium and sulphate and how these can be incorporated into the Project, with trial studies underway. The Project is designed to preserve optionality for new source control technologies as studies are advanced and they become feasible for application in the Elk Valley and for the FRX Project. (Updated for July 2021 DPD; consistent with July 2021 DPD)

IPD = Initial Project Description; DPD = Detailed Project Description; ANFO = ammonium nitrate/fuel oil; CCFR = combined coarse and fine rejects; EVR = EVR Operations Limited; FRX = Fording River Extension.

4.4.2 Water Treatment

Water treatment refers to efforts made to reduce the concentration of mining-related constituents in mine-influenced contact water before it enters the receiving environment. Different treatment technologies exist for the reduction of selenium and nitrate in water, and existing treatment facilities operated by EVR in the Elk Valley include the West Line Creek AWTF at LCO and the EVO SRF, which successfully treat up to 7.5 million and 20 million litres of water per day, respectively. At FRO, existing treatment facilities include the Fording River Operations South AWTF (FRO-S-AWTF), which has been operational since September 2022. The FRO-S-AWTF is treating mine-influenced contact water from the Swift, Cataract and Kilmarnock Creek drainage areas at a hydraulic capacity of up to 20 million litres of water per day. Additionally, the FRO North SRF Phase 2 (FRO-N SRF [which includes Post Ponds, Liverpool Ponds/Swift Pit and Clode], previously referred to as the Eagle 4 SRF), has been operational since late December 2023. The FRO-N SRF Phase 2 has a current maximum hydraulic capacity of up to 30 million litres of water per day. Two additional phases of FRO-N SRF (FRO-N I SRF P3 and FRO-N II SRF) are planned as per the 2022 Implementation Plan Adjustment (IPA; Teck 2022b) by the end of 2026, increasing the total maximum hydraulic capacity for FRO-N to 60 million litres of water per day, the latter phase including Kilmarnock as an influent source. Operational throughput will vary due to availability of water and management of loading to maintain facility stability. Mine-influenced contact water from the mine rock storage areas from the Project would drain to the Kilmarnock drainage, the Clode drainage or into the FRX Pit, with the former two drainages currently being collected for treatment at FRO-S-AWTF and FRO-N SRF, respectively. Monitoring data from locations such as the Elk River downstream of Michel Creek, located downstream of all EVR operations and shown in Figure 4.4-1, indicate that selenium concentrations are stabilizing and reducing. In 2024, the lowest selenium and nitrate concentrations in the upper Fording River downstream of treatment were achieved since 2015. Overall, in the Elk River and Koocanusa Reservoir, data indicate that selenium concentrations are stabilizing, and EVR expects further reductions as additional treatment is completed. Figure 4.4-2 provides a summary of water treatment facilities planned to 2027.

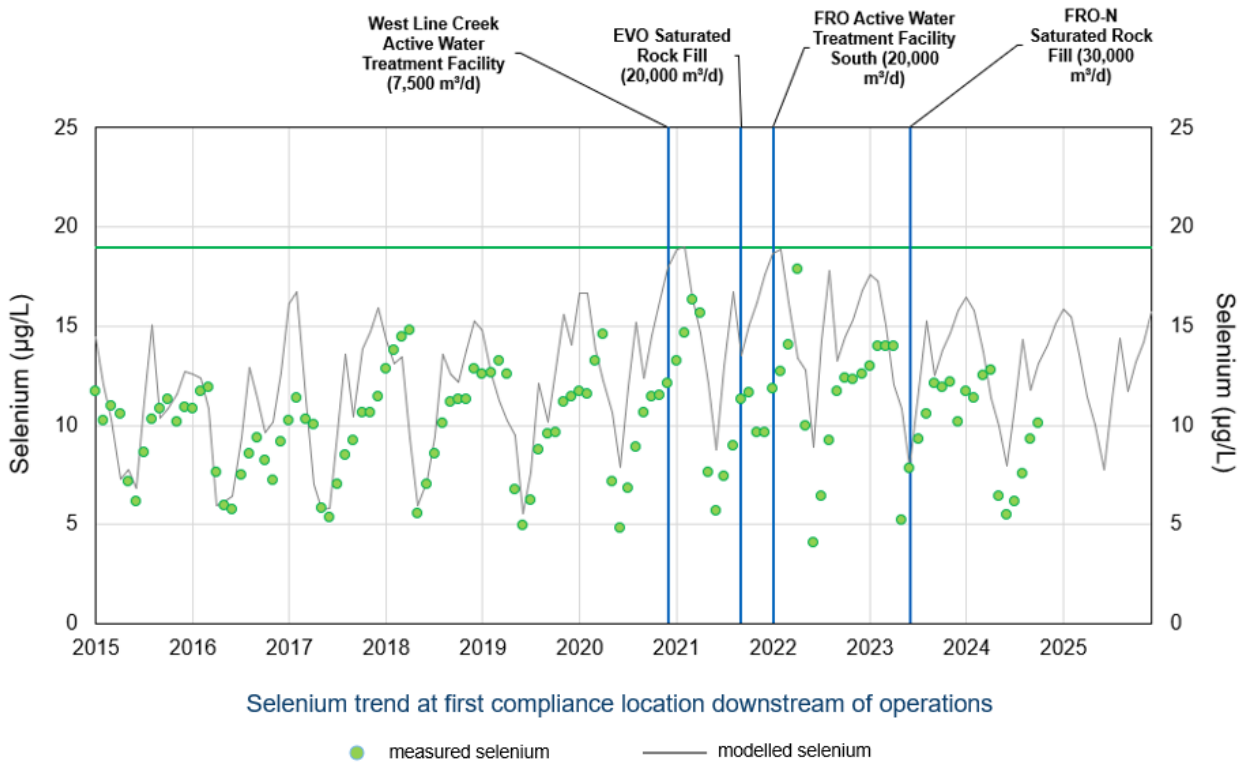
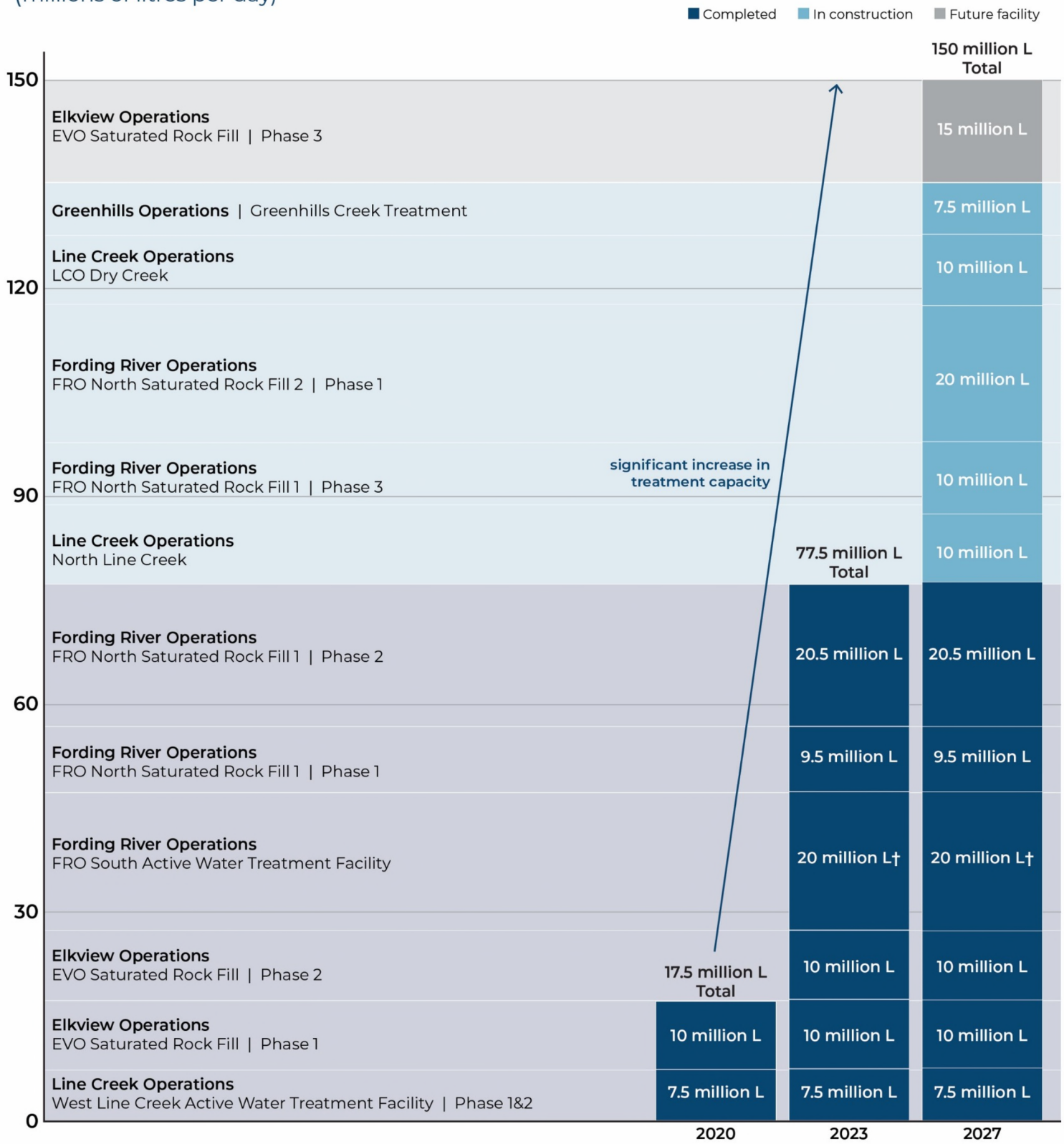


Figure 4.4-1: Monitored and Projected Selenium Concentrations at Elk River Downstream of Michel Creek

Water treatment facilities to 2027

(millions of litres per day)



*Based on 2022 Implementation Plan Adjustment

†Treating water since December 2021, commissioning fully complete as of June 30, 2022

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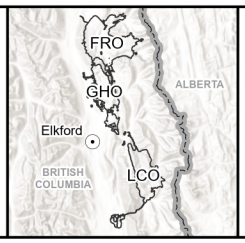


Figure 4.4-2: Water Treatment Facilities to 2027

DATE: 4/23/2025	MINE OPERATION: FORDING RIVER

Document Path: I:\CLIENTS\EVR\2025\CA0050291_7055\Mapping\03_DPD\CA0050291_7055_DPD_024_GIS_WaterTreatmentFacilities2027.aprx

Sources of mine-influenced contact water that could be further influenced by the Project include the Kilmarnock Creek drainage and the Clode Creek drainage. New sources of mine-influenced contact water could include the FRX Pit. These sources will be evaluated to determine the potential required treatment including:

- possible available treatment capacity at the FRO-S-AWTF
- possible addition of treatment capacity at the FRO-S-AWTF
- possible available treatment capacity at FRO-N SRF
- possible addition of treatment capacity at FRO-N SRF
- possible construction of additional treatment facilities (e.g., a new SRF); there are currently two locations where an SRF could be designed and installed into the mine plan

Additional water management structures will be included within the water management design to support treatment efficiency and opportunities to reduce river water withdrawals, including a reservoir and new infrastructure for the Kilmarnock Clean Water Diversion, as the current diversion infrastructure will be buried by mine rock and rendered inoperable.

The Project has been designed to be amenable to the application of EVR's source control construction techniques as they are currently understood. The Project's inclusion of source control for selenium and sulphate will take into consideration the level of certainty associated with implementing these measures in the Elk Valley. If future technologies are identified, the Project would re-evaluate treatment requirements as new information becomes available, and plans would be adjusted as appropriate and following application for relevant approvals and authorizations.

A description of the water quality treatment alternatives is presented in Table 4.4-2. The assessment will include technologies that are considered sufficiently ready for application based on available scientific evidence, following the process outlined in the Technology Readiness Assessment Guidance document, as well as discussion of technologies that may be deployed in future. Uncertainty associated with mitigations will be documented in the IS/A.

Table 4.4-2 Project Water Quality Treatment Alternatives

Water Quality Treatment Alternative	Evaluation of Alternative	Status
AWTF: Active water treatment facilities are a form of water treatment that pumps water through mechanical, chemical and/or biological treatment processes. The Project could incorporate AWTFs to reduce the constituents within mine-influenced contact water.	EVR has experience designing, constructing and operating AWTFs. An AWTF is considered a proven technology at TRL9. An AWTF is complex, requiring a relatively long time to plan, construct, commission and start operating (e.g., five years). The FRO-S-AWTF has been operational since September 2022. This facility is located by the Kilmarnock Settling Ponds and would intercept some of the Project's contact water.	***Feasible*** An AWTF can meet all feasibility criteria, depending on site-specific conditions. ***Selected*** The existing FRO-S-AWTF would intercept some of the Project's contact water. The Project continues to evaluate opportunities for other AWTFs. (Updated for the Revised DPD)
SRFs: Saturated rock fills are a form of water treatment that pumps water through saturated mine rock (e.g., a mined-out pit full of mine rock and water). As the water passes through the SRF, natural processes are actively managed to capture and hold constituents within the SRF, and the water outflow has improved water quality. The Project could incorporate SRFs to reduce the constituents within mine-influenced contact water.	EVR has experience operating SRFs and is in the process of planning and permitting additional phases of SRFs. An SRF is a proven technology at TRL7. Based on research and operational experience to date, SRFs are an effective means of water treatment. Compared to AWTFs and reverse osmosis high-density sludge (ROHDS), SRFs are relatively simple to construct, commission and bring into operation. Consideration of SRFs early in Project planning could allow early implementation and integration into Project water management. The FRO-N SRF Phase 2 has been operational since December 2023. This facility is located in Eagle Pit and could be used to intercept and treat some of the Project's contact water. The incorporation and reliance on SRFs for the Project will continue to be evaluated through the assessment of the Project.	***Feasible*** SRF treatment can meet all feasibility criteria, depending on site-specific conditions. ***Selected*** SRF treatment is selected as it is a proven technology that is relatively simple to construct, commission and operate. The Project mine plan incorporated two areas within the FRX Pit where SRFs could be implemented. The Project is planning on the methods and specific location(s) for integrating SRF water treatment into the Project. (Updated for Revised DPD)

Table 4.4-2 Project Water Quality Treatment Alternatives

Water Quality Treatment Alternative	Evaluation of Alternative	Status
ROHDS: Reverse osmosis high-density sludge is a form of water treatment that incorporates a high-density sludge process treatment that uses reverse osmosis where water is pumped to a clarifier/thickener to separate solids from liquids. The sludge is then dewatered in a filter press and the filtrate is recycled. Clarified water is then treated with an ultrafiltration system to remove particulate then with reverse osmosis to demineralize. The Project could incorporate ROHDS to reduce the constituents within mine-influenced contact water.	Reverse osmosis high-density sludge could be installed and would work to reduce selenium, nitrate and sulphate concentrations in the receiving environment through treatment of mine contact water. EVR is in the process of planning and permitting ROHDS technology at LCO as part of the Line Creek Water Treatment Project after piloting and following a rigorous technology assessment.	***Feasible*** The ROHDS treatment can meet all feasibility criteria, depending on site-specific conditions. ***Not Selected*** ROHDS treatment was considered but has not been selected at this time in the current Project mitigation. An ROHDS treatment facility is more complex than an SRF. The Project continues to evaluate other opportunities for ROHDS. It may be considered through the assessment and development of the IS/A, or should the Project move forward, within the IPA process. (Updated for Revised DPD)
In situ treatment: The Project could incorporate in situ treatment into mine rock storage design to reduce the constituents within mine-influenced contact water.	Mine rock storage areas could be designed to intercept water that passes through the mine rock. Examples could include suboxic zones and strategically constructing SRFs to intercept water, as discussed above. The SRF could be constructed below the mine rock or at the toe of the storage area.	***Not Feasible*** In situ treatment is not technically viable based on current technology maturity/readiness. EVR continues to evaluate in situ treatment technologies, with trial studies underway. (Consistent with IPD documents and July 2021 DPD)

AWTF = active water treatment facility; SRF = saturated rock fill; TRL = Technology Readiness Level; IPD = Initial Project Description; DPD = Detailed Project Description; FRO-N = Fording River Operations North; FRO-S-AWTF = Fording River Operations South Active Water Treatment Facility; ROHDS = reverse osmosis high-density sludge; LCO = Line Creek Operations; EVR = EVR Operations Limited; FRX = Fording River Extension; IS/A = Impact Statement/Application; IPA = Implementation Plan Adjustment.

4.5 Tailings Management

This section of the Revised DPD provides a description of the Project tailings strategy. The tailings strategy has been updated since the provincial and federal IPD documents and the July 2021 DPD were published. These updates reflect the results of technical investigations and analysis that have since been performed, ongoing studies, and consideration of early engagement feedback. EVR will advance all of the tailings management alternatives described in this section through to the environmental assessment process until such time that the tailings management strategy is confirmed.

4.5.1 Current Practice

Tailings is a waste stream from coal processing, consisting of sand- and silt-sized particles of rock, water, fine coal and trace quantities of coal processing chemicals. Tailings represent a small proportion of total waste managed at FRO. Tailings from the FRO Coal Processing Plant are currently managed as two separate streams:

- Most of the fine tailings, approximately 2.0 million tonnes per year (M t/yr), leave the FRO Coal Processing Plant as slurry (i.e., untreated, not thickened or dewatered)[11] and report to the South Tailings Pond (STP) (Figure 5.1-1). After settling, the thickened tailings materials are dredged from the STP and pumped to the Turnbull Tailings Storage Facility (TSF), and water from the STP is recycled as process water to the FRO Coal Processing Plant. Starting in 2025, a portion of the fine tailings stream are to be directly deposited into Turnbull TSF from the plant.
- A portion of the fine tailings, approximately 0.4 M t/yr, is dewatered using a vacuum disk filter and mixed with coarse coal rejects at the FRO Coal Processing Plant, creating the combined coarse and fine rejects (referred to as CCFR mixture) with less than 10% fines by volume. The CCFR mixture is then transported using haul trucks and placed at the Eagle 4 South Pit CCFR storage facility, with existing water management structures to direct surface water to sedimentation ponds prior to discharge.

4.5.2 Development of Project Tailings Strategy

Since the provincial and federal IPD documents and July 2021 DPD, EVR has continued to evaluate specific alternative solutions while considering early engagement feedback, best achievable technology and innovative approaches to manage tailings. This section presents an overview of the development and evaluation of the tailings management alternatives.

The IPD documents presented a range of alternatives for tailings handling, including slurry (untreated), thickened and dewatered. Alternatives for tailings storage were also presented: building a new dam; placing tailings in a mined-out pit; placing tailings in an in-pit or ex-pit mine rock storage area; and placing dewatered tailings in a stand-alone facility or mixing fine tailings with coarse coal rejects.

Early evaluation of the fine tailings alternatives determined that there were no new suitable locations in the Fording River floodplain near the plant site area available to place conventional slurry fine tailings similar to the existing South and North Tailings Ponds. The evaluation then focused on identifying suitable storage locations

[11] Untreated fine tailings contain approximately 97% water and were discussed in the IPD as tailings slurry. Thickened fine tailings contain approximately 30% to 60% water and were discussed in the IPD as thickened tailings. Dewatered fine tailings contain less than 30% water and were discussed in the IPD as dry tailings.

for thickened and dewatered tailings. Potential locations are constrained by the limited available space that is not part of existing or future mining, mine rock storage or other uses. A trade-off study was undertaken to evaluate the potential thickened and dewatered tailings alternatives on operational, technical, environmental and public concerns. As a result of the trade-off study, the dewatered tailings alternative with storage at the Eagle 4 South CCFR storage facility was selected for the July 2021 DPD. However, EVR is currently investigating the following potential tailings management solutions for the Project:

- **Thickened tailings** - This potential solution would thicken the fine tailings using the current tailings management process (i.e., settling and dredging at the STP) or by installing tailings thickening equipment within or close to the FRO Coal Processing Plant. In addition to storage of thickened tailings at the Turnbull TSF, EVR is investigating potential in-pit storage locations such as potential co-disposal of the thickened fine tailings with mine rock.
- **Dewatered tailings** - This potential solution would capture and dewater the fine tailings at the FRO Coal Processing Plant. The dewatered fine tailings would be combined with coarse rejects at the plant and transported for storage at a CCFR storage facility, such as the existing Eagle 4 South Pit CCFR storage facility. It would involve improving the tailings dewatering efficiency and capacity for the existing equipment, which would likely include new equipment at the FRO Coal Processing Plant, or an expansion to the existing plant. An increase in FRO's current CCFR storage capacity would likely be required.
- **Fine coal recovery** - This potential solution would involve installing an ultra-fine coal capture system at the FRO Coal Processing Plant. This would enable FRO to capture 30% to 50% of the fine tailings from the thickener, dewatering the product, and potentially market some of the ultra-fine coal loss that currently reports as fine tailings. The potential improvement may reduce the overall amount of fine tailings that needs to be stored and managed on site.

As shown in Table 4.5-1, all of the above tailings management alternatives have been selected for the proposed Project. EVR is currently investigating different configurations or combinations of the three selected solutions. A multiple accounts analysis was conducted to determine which options should be advanced that considered mine impact, cost, closure, design, environmental impact and water management, geotechnical and permitting complexity. Regardless of the proposed tailings management configuration, the Project would first utilize FRO's current practices and storage capacity (Section 4.5.1) before transitioning to the selected alternative. A dam raise would be required to increase the capacity of the Turnbull TSF, which will reach its existing storage capacity in approximately 2029, regardless of the tailings management configuration. EVR expects to present its proposed tailings management configuration or alternative configurations, including the timing to transition to the selected tailings management alternatives, in the IS/A.

The selected tailings management alternatives will be designed, constructed and operated in accordance with EVR's internal tailings standards, the Global Industry Standard on Tailings Management (Global Tailings Review 2020) and applicable regulations. Through the assessment, the tailings strategy will continue to be refined based on available information and ongoing studies as well as on feedback received through the coordinated assessment process and from potentially affected Indigenous Peoples.

Table 4.5-1: Project Fine Tailings Alternatives

Fine Tailings Alternative[(a)]	Evaluation of Alternative	Status
Thickened Tailings	The thickened tailings alternative offers the following technical advantages: • EVR has experience with thickened tailings, including the experience of managing tailings at FRO with the use of the STP and dredging for close to 40 years. • There are a number of proven thickening technologies to remove water from a slurry. For the Project, this alternative can be implemented using FRO's current tailings management process or by installing tailings thickening equipment at the FRO Coal Processing Plant. • The thickened tailings can be stored at the Turnbull TSF, which is a permitted existing TSF with relevant water management facilities. • Water recovered from the thickening process would be re-used at the FRO Coal Processing Plant, as per the current tailings management process. The Turnbull TSF will reach capacity in approximately 2029 and will require a dam raise to support existing permitted reserves at FRO to avoid disruptions to operations, and transition to a potential in-pit co-disposal storage if the Project is approved.	***Feasible*** This alternative meets all the feasibility criteria. ***Selected*** The Project plans to implement a thickened tailings process, starting with FRO's current tailings management process (with the use of the STP and dredging) while investigations on the installation of thickening equipment at the FRO Coal Processing Plant continues. Thickened tailings would be stored in the Turnbull TSF, with an increase in the storage capacity of Turnbull TSF by raising the dam height, followed by transitioning to potentially an in-pit co-disposal facility. (Status updated for the Revised DPD)
Dewatered Tailings	The dewatered tailings alternative offers the following technical advantages: • EVR has experience with tailings dewatering processes and storage of the dewatered tailings at FRO, LCO, GHO and Coal Mountain mine. A dewatering process is currently used on a portion of the fine tailings at FRO. • The dewatered tailings can be stored at FRO's existing CCFR storage facility; however, the Project will require additional storage capacity to accommodate the additional CCFR quantity with dewatered tailings. • Water recovered from the dewatering process would be re-used at the FRO Coal Processing Plant. The Turnbull TSF will reach capacity in approximately 2029 and will require a dam raise to support existing permitted reserves at FRO while transitioning to dewatered tailings. The Turnbull TSF design modifications are being completed outside of the Project due to earlier timing requirements for FRO. The Turnbull TSF will provide storage for fine tailings during plant upset conditions for the life of mine for the Project. Additional CCFR storage capacity may be required to accommodate dewatering tailings associated with the Project, should it be approved.	***Feasible*** This alternative meets all the feasibility criteria. ***Selected*** The Project plans to implement a dewatered tailings process in combination with the thickened tailings process. A plan for increasing FRO's current dewatering process capacity is currently under investigation. Dewatered tailings would be combined with coarse rejects and stored in a CCFR storage facility. (Status consistent with the July 2021 DPD; however, this alternative is now selected in combination with the other selected alternatives)

Table 4.5-1: Project Fine Tailings Alternatives

Fine Tailings Alternative[a]	Evaluation of Alternative	Status
Fine Coal Recovery	The fine coal recovery alternative, implemented in conjunction with the thickened tailings or dewatered tailings equipment at the FRO Coal Processing Plant, could capture additional coal from the tailings stream. This alternative offers the following economic and technical advantages: • If feasible, it could result in recovering marketable steelmaking coal from the fine tailings, thus resulting in more favourable economics. • Reducing the volume of dewatered and thickened tailings requiring storage.	***Feasible*** While technical uncertainties remain, this alternative is expected to meet all the feasibility criteria. ***Selected*** The Project plans to implement a fine coal recovery process, in combination with the thickened and dewatered tailings processes, to recover marketable coal and reduce the volumes of tailings requiring storage. A plan for fine coal recovery at the FRO Coal Processing Plant is currently under investigation. (New for the Revised DPD)

a) For the purposes of this discussion, dewatered tailings is a mixture of water and particles with less than 30% water by weight. The IPD documents referred to dewatered tailings as dry tailings. Thickened tailings is a mixture of water and particles with approximately 60% water by weight. A thickened tailings mixture would have a similar consistency to toothpaste.

STP = South Tailings Pond; TSF = tailings storage facility; DPD = Detailed Project Description; GHO = Greenhills Operations; LCO = Line Creek Operations; CCFR = combined coarse and fine rejects; FRO = Fording River Operations; EVR = EVR Operations Limited.

4.6 Coal and Mine Rock Handling Alternatives or Decarbonization Technologies

This section provides a description of Project coal and mine rock handling alternatives (Table 4.6-1).

The Project would use the FRO equipment fleet for mining and coal and mine rock handling at the Project mine area, including electric and/or diesel-electric mining shovels; diesel and/or diesel-electric haul trucks; a variety of earth-moving equipment such as dozers, excavators and graders; drilling equipment; and a fleet of medium and light duty trucks (e.g., tractor trailers and pick-up trucks).

Coal and mine rock handling generates a large portion of mine emissions (Section 5.4.2) and influences mine and mine rock storage area design. Over time and because of operational need, equipment is retrofitted and replaced with newer, lower-emission equipment, which gradually reduces GHG and other air emissions. Some of the equipment might be replaced with more advanced options (e.g., electric-powered light duty trucks) that benefit from green electricity infrastructure in BC.

Broader refinements to the equipment and approach to coal and mine rock handling could generate larger emissions reductions (Table 4.6-1). These approaches might not be proven in time for evaluation during the assessment of the Project. Therefore, the Project will be conservatively defined assuming the use of conventional haul trucks (shown as the selected alternative in Table 4.6-1). However, as part of EVR's commitment to continuous improvement, the Project would allow a shift to new approaches in the future. These new approaches will continue to be evaluated for their technical and economic feasibility, emission reduction benefits and other effects as the Project progresses.

Table 4.6-1: Project Coal and Mine Rock Handling Alternatives

Materials Handling Alternative	Evaluation of Alternative	Status
Haul trucks The Project could use typical diesel-electric haul trucks.	FRO has a fleet of diesel-electric haul trucks. Diesel combustion is a large portion of mining GHG emissions. EVR will be evaluating alternatives to diesel combustion to pursue its goal to be net zero by 2050. The assessment of the Project might evaluate diesel-electric equipment as a conservative case while committing to adopting alternatives in the future.	***Feasible*** This alternative meets all the feasibility criteria. ***Selected*** The Project would use the FRO equipment fleet for the Project while evaluations into other coal and mine rock handling options continue. (Consistent with July 2021 DPD)
Autonomous haul trucks The Project could use haul trucks that have some level of self-driving capability.	EVR is piloting the use of autonomous haul trucks. Autonomous haul trucks require additional infrastructure to be incorporated into mine plans. Autonomous haul trucks would require consideration of reskilling opportunities for existing employees. Autonomous haul trucks can be diesel powered or alternatives.	***Not Feasible*** The alternative is not technically and economically viable for the site-specific application based on currently available information. The Project continues to evaluate the use of autonomous haul trucks, including through current pilot trials, and may seek opportunities to incorporate autonomous haul trucks if benefits are proven. (Consistent with IPD documents and July 2021 DPD)
Trolley assist for haul trucks The Project could use infrastructure to connect haul trucks to an external source of electrical power.	Diesel-electric haul trucks use the diesel engine to generate electricity. The electricity is used to move the truck. Trolley assist is a system that connects haul trucks to an overhead electrical cable system. When the truck is connected to the cable, the diesel engine goes to idle. This reduces the amount of diesel consumed and the related emissions. Typically, trolley assist is installed on long uphill grades. Trolley assist requires wider haul roads to create room for the electrical cables and poles. Trolley assist requires capital inputs for the truck modifications and support infrastructure. This cost could be partially offset by reduced diesel costs or carbon taxes.	***Not Feasible*** The alternative is not technically and economically viable for the site-specific application based on currently available information. The Project continues to evaluate the use of trolley assist for haul trucks and may seek opportunities to incorporate trolley assist if benefits are proven. (Consistent with IPD documents and July 2021 DPD)

Table 4.6-1: Project Coal and Mine Rock Handling Alternatives

Materials Handling Alternative	Evaluation of Alternative	Status
Shovels (also known as loading units) The Project could use a combination of electric and diesel shovels.	FRO has a fleet of electric rope shovels and diesel hydraulic shovels, and a majority are electric shovels. Diesel combustion is a large portion of mining GHG emissions.	***Feasible*** This alternative meets all the feasibility criteria. ***Selected*** The Project would use a combination of electric and diesel shovels. The Project continues to evaluate when in the mine development sequence electric shovels can be used for the majority of material movement. (New for Revised DPD*)*
Conveyors The Project could use a conveyor system to move mine rock or coal.	Electrically powered conveyors can move material safely and efficiently. Some material would need to be crushed to reduce its size prior to conveying. Crushing and conveying would require additional stockpiles. Conveyors are used in combination with haul trucks. The trucks do short complex flexible routes to and from the conveyor, and the conveyor does the long stable route. Conveyor systems, used in combination with haul trucks, have lower emissions than haul trucks alone. Mine planning must account for the use of conveyors, allowing their route to be efficient and not require frequent adjustment. EVR is evaluating implications of crushing mine rock on: • geochemical characteristics (i.e., do smaller rocks leach more constituents?) • geotechnical characteristics (i.e., do smaller rocks pack tighter in a mine rock storage area and have less air and water flow?) Conveyor systems require large initial capital inputs for infrastructure. Conveyor systems are inflexible and upsets can impact the entire operation. Conveyor systems are expensive to relocate and are only suitable for routes with little change over time.	***Not Feasible*** The alternative is not technically and economically viable for the site-specific application based on currently available information. The Project continues to evaluate the use of conveyors (including implications of crushing mine rock) and may seek opportunities to incorporate conveyors if benefits are proven. Early evaluation for the Project indicates that conveyors might be more suitable for handling coal than mine rock. (Consistent with July 2021 DPD*)*

IPD = Initial Project Description; DPD = Detailed Project Description; GHG = greenhouse gas; EVR = EVR Operations Limited; FRO = Fording River Operations.

4.7 Site Water Management

This section provides a description and rationale for the Project's site water management (Table 4.7-1). The Project will include a combination of both new and existing water management infrastructure. Water management structures will be constructed below proposed disturbances to direct all sediment-impacted water to sediment ponds. The water management structures will be reasonably constructed prior to work that causes a disturbance. All sediment-impacted water for Q10 24-hour flows will be settled in sediment ponds.

Table 4.7-1: Site Water Management Alternatives

Water Management Infrastructure Alternative	Evaluation of Alternative	Status
Sediment ponds	Mine-influenced water from the Kilmarnock Valley is currently directed to the Phase 2 (primary and secondary) Kilmarnock Settling Ponds. Additional new sediment ponds will be added to the west aspect of Castle Mountain to manage suspended solids in surface runoff. Sediment ponds will be designed to treat Q10 24-hour flows and to withstand flows for Q200 events. Overflow channels will be designed to accommodate flows greater than Q10 24-hour up to a Q200 event. The water management plan will continue to be evaluated to assess sediment pond location and use of seasonal bypasses. Methods to manage selenium speciation will be evaluated.	***Feasible*** This alternative meets all the feasibility criteria. ***Selected*** New sediment ponds will be constructed to be used in addition to existing sediment ponds. (Consistent with July 2021 DPD)
Open conveyance channels	Open conveyance channels will be provided to direct sediment-impacted water to sediment ponds. All sediment-impacted water will be treated. Open conveyance channels will be provided on the west aspect of Castle Mountain to direct sediment-impacted water to sediment ponds. Open conveyance channels will be designed to convey Q10 24-hour flows and to withstand flows for Q200 events. Conveyance channels may be built as gravity-fed or pumped pipelines.	***Feasible*** This alternative meets all the feasibility criteria. ***Selected*** New construction of open conveyance channels for sediment-impacted water. (Consistent with July 2021 DPD)
Diversion structures	Sediment-impacted water will be directed to open conveyance channels then to sediment ponds. The water will be directed to open conveyance channels by diversion structures located in the creek bed. Diversion structures will be designed to treat Q10 24-hour flows and to withstand flows for Q200 events. Overflow channels will be designed to accommodate flows greater than Q10 24-hour up to a Q200 event.	***Feasible*** This alternative meets all the feasibility criteria. ***Selected*** New construction of diversion structures and weirs will be used to direct sediment-impacted water to open conveyance channels and sediment ponds. (Consistent with July 2021 DPD)

Table 4.7-1: Site Water Management Alternatives

Water Management Infrastructure Alternative	Evaluation of Alternative	Status
Rock drains	Water flows in the Kilmarnock Valley could be conveyed through mine rock with rock drains. The rock drains could be constructed through placement of mined rock.	***Feasible*** While design and engineering studies continue, this alternative is expected to meet all the feasibility criteria. ***Not Selected*** Rock drains will be evaluated for use in conveying flows through mine rock in the Kilmarnock Valley. (Updated for Revised DPD)
Kilmarnock Clean Water Diversion	EVR is required to divert 86,000 m^3 per day of non-contact water from the upper Kilmarnock Valley to lower Kilmarnock Valley. The current diversion infrastructure to manage this will be rendered inoperable due to being buried as mine rock is placed on it. New infrastructure to replace the obsolete water diversion infrastructure will be constructed and will include an inlet/berm and conveyance structure. Different options for the conveyance are being considered, including a buried gravity pipeline and options for a pump and pipeline. As with the current diversion, flows greater than 86,000 m^3 will be directed to overflow channels in the inlet berm.	***Feasible*** This alternative meets all the feasibility criteria. ***Selected*** The Project will include construction of new infrastructure to replace the existing Kilmarnock Clean Water Diversion, including new construction of an inlet and berm. The Project will continue investigation of the different conveyance options. (Consistent with July 2021 DPD)
Reservoir	A reservoir is likely needed to operate the proposed FRX SRF efficiently. Mine-influenced water from various sources (e.g., Kilmarnock, in pit) could be directed to the reservoir for storage to be used throughout the year. This water could also be used for consumptive uses, reducing use from other sources.	***Feasible*** This alternative meets all the feasibility criteria. ***Selected*** A new reservoir will be constructed. (Consistent with July 2021 DPD)

DPD = Detailed Project Description; SRF = saturated rock fill; EVR = EVR Operations Limited; FRX = Fording River Extension.

4.8 Support Infrastructure

This section provides a description and rationale for the Project's support infrastructure (Table 4.8-1). The Project will use a combination of existing FRO facilities, including the FRO Coal Processing Plant, offices, maintenance shops, explosives storage and other existing support facilities, as well as new support infrastructure. The new support infrastructure required for the Project includes access road and utility connections to the existing FRO and satellite support facilities in the Project mine area.

Table 4.8-1: Project Support Infrastructure Alternatives

Existing Infrastructure Alternative	Evaluation of Alternative	Status
Access to the Project mine area Regional road access to the Project will be required for movement of: • workers • equipment and supplies Site access will be required within the Project mine area and to connect to FRO for the movement of: • workers • equipment and supplies • mine rock • raw coal	FRO is currently accessed by Highway 3, Highway 43 and Fording Mine Road. The Project is directly south of the existing FRO and adjacent to Fording Mine Road. Construction access will be required within the Project mine area. Access roads will be required to connect the Project to existing facilities and infrastructure. Haul roads will be required within the Project mine area and to connect the Project to the FRO Coal Processing Plant and to existing FRO areas planned for mine rock storage.	***Feasible*** Existing and new construction and mine area access roads meet all the feasibility criteria. ***Selected*** Existing regional road access will meet Project needs. New construction and mine area access roads and haul roads will be required. (Consistent with July 2021 DPD)
Electrical supply for the Project Electrical supply for the Project will be required for: • buildings and facilities • electric shovels • possible haul truck trolley assist • possible conveyors	Initially, the 138 kV electrical power for FRX will be supplied by the Kan-Elk Transmission line via the Britt Creek spur from the northwest. Additional electrical power is planned to be provided to FRO/FRX from a 230 kV transmission line that is planned to be constructed in the early 2030s once the future electrical load is better understood. The combination of the 138 and 230 kV transmission lines will provide adequate power for FRO and FRX. An FRO to FRX extension, substation(s), transformers and distribution lines will be required to connect all Project components to the transmission power.	***Feasible*** Existing and new electrical infrastructure meet all the feasibility criteria. ***Selected*** Existing FRO regional electrical supply supplemented with the future 230 kV transmission power will meet Project needs. New electrical infrastructure will be required to connect the Project to the transmission power. (Consistent with July 2021 DPD)
Project coal processing Steelmaking coal from the Project will need to be processed prior to distribution to market.	The mining rate of the Project is planned to align with the available processing capacity of the FRO processing facilities.	***Feasible*** Existing FRO processing facilities meet all the feasibility criteria for use for the Project. ***Selected*** Existing FRO processing facilities will meet Project needs.[(a)] (Consistent with IPD documents and July 2021 DPD)

Table 4.8-1: Project Support Infrastructure Alternatives

Existing Infrastructure Alternative	Evaluation of Alternative	Status
Project product distribution Steelmaking coal from the Project will need to be distributed to market.	Product distribution for FRO uses an existing rail loop and loading facilities. Project coal will be distributed to market through the existing FRO rail loop and loading facilities.	***Feasible*** Existing FRO product distribution facilities meet all the feasibility criteria for use for the Project. ***Selected*** Existing FRO product distribution facilities will meet Project needs. (Consistent with IPD documents and July 2021 DPD)
Raw and processed coal stockpiles Raw and clean coal stockpiles (including temporary) may be required to smooth out variations in mining rate, processing rate and loading rate. They also allow blending of coal from different parts of the mine.	Stockpiles at FRO allow operational flexibility, meeting both processing plant and customer needs. The Project will continue to use the existing stockpiles. The Project may require additional temporary raw coal stockpiles at the Project mine area for operational flexibility and to support processing plant needs.	***Feasible*** Existing FRO raw and clean coal stockpiles meet all the feasibility criteria for use for the Project. ***Selected*** Existing FRO raw and clean coal stockpiles will meet Project needs at the processing plant. (Consistent with July 2021 DPD)
Maintenance shops, warehousing, dry, office, etc. The Project will require buildings to house mine support activities including: • administration • planning/engineering • supply • maintenance	The buildings and infrastructure at FRO provide for the existing operations. The Project could continue to use the existing buildings. The Project will require additional buildings and infrastructure closer to the proposed mine pit.	***Feasible*** Existing and new FRO buildings and infrastructure meet all the feasibility criteria for use for the Project. ***Selected*** Existing FRO buildings will continue to be used. New satellite offices, maintenance and other support facilities will be needed at the Project mine area. (Consistent with July 2021 DPD)
Explosives storage, manufacturing and delivery The Project will require explosives to blast mine rock as part of the mining process.	The explosives storage, manufacturing and delivery systems at FRO provide for the existing operations. The Project could rely on the existing manufacturing and delivery systems as well as the main storage facilities. The Project may require an additional explosives magazine and product storage closer to the proposed mine area to provide for operational flexibility and storage capacity.	***Feasible*** Existing and new explosives storage, manufacturing and delivery facilities meet all the feasibility criteria. ***Selected*** Existing FRO explosives storage, management procedures, manufacturing and delivery systems will continue to be used. New satellite magazine (explosives storage) and product storage (e.g., ANFO silo) will be needed at the Project mine area. (Consistent with July 2021 DPD)

a) FRO coal processing components and activities include the processing plant, water supply and management for processing, and processing wastes including fine tailings and CCFR.

IPD = Initial Project Description; DPD = Detailed Project Description; ANFO = ammonia nitrate and fuel oil; CCFR = combined coarse and fine rejects; FRO = Fording River Operations; FRX = Fording River Extension.

4.9 Reclamation and Closure

Reclamation and closure designs for the Project are not yet final, but additional details about EVR's overall approach to reclamation and closure for the Project are provided in Section 5.6. EVR has been investigating multiple alternatives to the final landform and watercourse design. The approach to the final reclamation and closure design is to create a landscape and watercourses more reflective of natural conditions and function. Multiple iterations of landform and watercourse designs have been created and reviewed to achieve safe and stable outcomes that support biodiversity and water quality objectives.

The alternate means of undertaking the Project previously described creating the starting context for closure planning and may extend into the Closure Phase. Reduced water treatment requirements realized from water quality and source control options, implemented during mining operations, are anticipated to extend into closure. The water treatment facilities constructed during mining operations are expected to continue operating in closure until water quality compliance without treatment can be demonstrated. Much of the site water management infrastructure in place at the end of mining is expected to continue operating into closure, ensuring compliant water flow and quality until compliance can be demonstrated without some structures. Infrastructure supporting ongoing activities during closure, including water management and treatment, will remain in place until the activities supported by that infrastructure are no longer required. Reclamation of the FRX Pit, mine rock storage areas and tailings storage facilities will be completed progressively through the mining and closure periods, working towards final landscapes that incorporate long-term water treatment, water management and infrastructure requirements with biodiversity and land use objectives.

Biodiversity and land use alternatives evaluated are as follows:

- consideration of wildlife habitat corridors to natural areas around the Project and developing a landform that focuses on VCs, habitat suitability and ecosystem function
- investigation of opportunities to salvage various soil and subsoil layers to improve plant survival and community diversity on reclamation landforms
- assessment of direct soil placement opportunities as an alternative to soil stockpiling
- high-level investigation of alternative ecosystem prescriptions focused on maximizing grasslands and forests on reclaimed landscapes
- configuration of top-down and bottom-up placement to manage footprint and support progressive reclamation, incorporating macro-scale landform features, natural form, function and overall visual quality

Further refinement of EVR's reclamation and closure plan is anticipated through the assessment process. The staged and final reclamation and closure designs will be developed using empirical methods where available and will be guided by site-specific and regional research and experience as well as engagement with potentially affected Indigenous Peoples, the public and government agencies. EVR will undertake engagement within the assessment phase with KNC and Yaq̓it ʔa·knuqƛi ʼit including developing end land use goals considering Ktunaxa values, which include re-establishing surface water and creating functionality.

4.10 Staging of the Project

In response to the request from KNC and Yaq̓it ʔa·knuqɬi ’it and criteria provided in Table 3.2-2, the project size and duration have been reduced to 1.5 generations or less (34 years) and a staged approach has been adopted providing checkpoints against Project conditions, effects, and benefits to support future generational decision making.

This approach aims to allow key Project decisions to remain within a timeframe that is more consistent with Ktunaxa perspectives on generational stewardship and governance. Considering the Project as a single stage provides the opportunity to make regulatory approval decisions based on the projected effects for the full foreseeable mine life. Separating the Project into more than one stage represents an opportunity to satisfy stage-related conditions to be included in the Environmental Assessment Certificate before moving on to a subsequent stage and allows time to prove effectiveness in the mitigations planned to manage potential effects.

Early Engagement Feedback Note

Early engagement on the Project included feedback expressing concerns that the Project mine life is too long and does not represent generational decision making. To address these concerns, EVR has investigated staged mining alternatives that would divide the Project mine plan, on the basis of footprint and schedule, into smaller stages. As described in this section, a two-stage Project was selected. Staging the Project allows a condition to be included in the Environmental Assessment Certificate for the Project requiring that EVR be in compliance with the conditions identified in the Environmental Assessment Certificate before proceeding on to Stage 2 of the Project.

This section provides the comparison of two Project staging alternatives:

- **Single-stage Project** - Mining the full mine life of the selected FRX Pit (Section 4.10) in the north-to-south mining direction and with progressive backfilling (Section 4.2), with mine rock placement in the Kilmarnock Creek drainage and in Eagle and mined-out FRX pits (Section 4.3), and including all the other selected Project components and activities as described in the preceding sections (Sections 4.4 through 4.9).
- **Two-stage Project** - Dividing the FRX Pit footprint in approximately half, with distinct north and south stages. Mining would progress for approximately two decades within Stage 1 in the northern half of the Project footprint. Mine rock placement would start in the Kilmarnock Creek drainage and Eagle Pit, and then in the mined-out portions of the Stage 1 mine pit in the later part of Stage 1. Pending compliance with conditions in the Environmental Assessment Certificate, mining would then proceed into the southern half of the pit with mine rock placement primarily as in-pit backfill in the Stage 1 area and in the mined-out portions of Stage 2.

Three sizes for the two-stage approach were considered:

- **Small Stage 1 – Large Stage 2** - A smaller Stage 1 was considered; however, the risk associated with the timing of Stage 2 decisions and EVR having adequate time to meet currently unknown conditions made it not feasible.
- **Medium Stage 1 – Medium Stage 2** - Balances progression of mining ability to address concerns raised by KNC and Yaq̓it ʔa·knuqɬi ’it with economic certainty and timing of Stage 2 decision making.

- **Large Stage 1 – Small Stage 2** - A larger Stage 1 negated the ability to address concerns raised by KNC and Yaq̓it ʔa·knuqƛi ’it and the potential benefits of staging the Project by incorporating a majority of the impacts within the first stage.

A delay in the disturbance in the Chauncey Creek drainage was considered and found not to be economically and technically feasible.

Both stages of the Project are crucial to the long-term viability of FRO and adequate early engagement with potentially affected Indigenous Peoples. A staged approach helps avoid "project splitting" and promotes transparent engagement with Ktunaxa Nation and other Indigenous groups. This method allows a comprehensive assessment of the full potential Project impacts upfront while also preserving a future decision point. The full mine life of the Project (combined Stage 1 and Stage 2) would remain at approximately 34 years. For the two-staged alternative, Stage 1 on its own would be completed by Year 25 (with Year 0 aligning with the start of construction and Year 3 aligning with the start of Stage 1 mining), with a decline in coal production after Year 16. Stage 2 mining would start in Year 18 and continue for the remainder of the mine life. Thus, for the two-staged alternative, confirmation that the Project would move to Stage 2 would be required sufficiently ahead and no later than two years prior to the start of Stage 2 production, or by Year 16 (early 2040s). Table 4.10-1 summarizes the key parameters for the two alternatives.

Table 4.10-1: Project Staging Alternatives

Parameter	Single-Staged Project (Stage 1 + Stage 2 Combined)	Two-Staged Project	
		Stage 1	Stage 2
Timeframe[a]	Years 3 to EOM (approximately Year 36)	Years 3 to 25	Years 18 to EOM (approximately Year 36)
Clean coal production	280 Mmtcc[b]	151 Mmtcc[b] (54%)	129 Mmtcc[b] (46%)
Mine rock volume	3,006 Mbcm	1,705 Mbcm (57%)	1,301 Mbcm (43%)
Clean strip ratio	10.8	11.3	10.2
FRX Pit disturbance area	1,228 ha	725 ha (59%)	503 ha (41%)
Listed Grassland and Brushland Disturbance	235 ha	122 ha (52%)	113 ha (48%)
Disturbance within Chauncey Creek drainage area	119 ha	55 ha (46%)	64 ha (54%)

a) Year 0 has been defined as the start of construction (2028).

b) Reported quantity includes Proven Mineral Reserves, Probable Mineral Reserves, and Inferred Mineral Resources within the constraining volume of the life-of-mine design. Mineral Resources are not Mineral Reserves and do not have demonstrated economic viability. Quantities expressed as clean coal tonnages (mtcc) are for discussion purposes only.

EOM = End of Mining; Mbcm = million bank cubic metres; Mmtcc = million metric tonnes of clean coal; FRX = Fording River Extension

Staging on its own would not alter the potential Project effects over the full (combined Stage 1 and Stage 2) mine life (Table 4.10-1). While staging the Project would not limit the types of interactions between the Project

and the environment, it would mean that some impacts would be deferred until such time as there was increased confidence in the mitigations intended to manage potential effects.

Table 4.10-2 summarizes the considerations for the two staging options for the Project.

Table 4.10-2: Staged Mining Alternatives

Project Staging Alternative	Evaluation of Alternative	Status
Single-Stage Project The FRX Project proposed as one single stage incorporating its full mine life.	Staged mining, as described in Table 4.10-1 and shown in Figure 4.1-1, would not affect the economic and technical viability of the Project, assuming both stages would be included. Staging on its own would not alter the potential Project effects over the full (combined Stage 1 and Stage 2) mine life. It is EVR's intention that a condition be included in the Environmental Assessment Certificate for the Project requiring that EVR be in compliance with the conditions of the Environmental Assessment Certificate before proceeding on to Stage 2 of the Project. For either option, it was determined that the environmental assessment to be documented in the IS/A would be conducted on the full Project footprint so as to understand the effect of the full Project for the purposes of decision making under the federal IAA and the BC EAA.	***Feasible*** This alternative meets all the feasibility criteria. ***Not Selected*** This alternative was not selected due to feedback from KNC and Yaq̓it ʔa·knuqɬi ʼit that the Project mine life is too long and does not represent generational decision making. (Updated for the Revised DPD)
Two-Stage Project The FRX Project in two stages, as described in Table 4.10-1 and shown in Figure 4.1-1, with each stage completed within a generational timeframe of less than 25 years.		***Feasible*** This alternative meets all the feasibility criteria. ***Selected*** A two-staged Project is selected in response to feedback from KNC and Yaq̓it ʔa·knuqɬi ʼit. (New option for Revised DPD)

DPD = Detailed Project Description; IS/A = Impact Statement/Application; FRX = Fording River Extension; EVR = EVR Operations Limited; KNC = Ktunaxa Nation Council; IAA = *Impact Assessment Act*; BC EAA = British Columbia *Environmental Assessment Act*.

4.11 Resource Project Scope Identified for Assessment

This section summarizes the Project scope identified for the IS/A, considering the alternative means presented in Sections 4.1 0through 4.10.

Through engagement with KNC and Yaq̓it ʔa·knuqɬi ʼit, a Project mine design that supports a pit shell that balances the purpose of the Project with environmental and geotechnical constraints (Option 7 in Section 4.10) at Castle Mountain was selected as the appropriate area and scope for the Project assessment. The primary components of the Project include:

- the FRX Pit, which would be mined from north to south as a conventional open pit with progressive backfilling (Sections 4.10 and 4.2) using the FRO fleet of diesel-electric haul trucks, while maintaining the flexibility to transition into other low-carbon material handling options as the technology evaluations continue (Section 4.61.1)
- mine rock storage areas, including mine rock placement within the Kilmarnock Creek drainage, within the existing Eagle Pit, and in the FRX Pit (Section 4.3)

- water quality source control and treatment, including plans for the incorporation of nitrate source control, use of existing water quality treatment infrastructure and new SRF treatment infrastructure, while maintaining the flexibility to incorporate new treatment and source control technologies if and as they are identified and determined to be effective and feasible for application to the Project (Section 4.4)
- tailings management utilizing FRO's current practices and storage capacity at the beginning of the Project, and then transitioning to a thickened or dewatered tailings process and new storage infrastructure, which will be selected during the IS/A (Section 4.51.1)
- site water management using a combination of both new and existing water management infrastructure (Section 4.7)
- support infrastructure (Section 4.8) including:
    - new and existing access roads
    - new and existing electrical supply infrastructure (e.g., power lines)
    - new satellite facilities to support the Project, including offices, maintenance shops, warehouses, explosives management facilities, and other support facilities
    - other existing FRO support infrastructure, including coal processing, product distribution, access, explosives management and administrative facilities

Reclamation of the FRX Pit and mine rock storage areas will be completed progressively through the mining and closure periods, working towards final landscapes that incorporate long-term water treatment, water management and infrastructure requirements with biodiversity and land use objectives (Section 4.9).

The Project would be in two stages (Section 4.10), dividing the mine plan into two smaller stages based on footprint and schedule. It is proposed that a condition be included in the Environmental Assessment Certificate for the Project requiring that EVR be in compliance with the conditions of the Environmental Assessment Certificate before proceeding onto Stage 2 of the Project. The timing of the staging decision should be made several years prior to the start of mining of the second stage to allow sufficient time for condition compliance, business planning, mine design, and permitting to adapt to either outcome.

5.0 Project Information

This section of the Revised DPD provides a description of the Project incorporating the selected alternatives evaluated in Sections 3.0 and 4.0, beginning with an overview and followed by subsections on deposit geology and resource characterization, the mine plan, waste and emissions, public and environmental safety, mine reclamation and closure, and water use.

5.1 Project Overview

5.1.1 Project Location

The Project would be located in the East Kootenay Region of southeastern BC (Figure 1-2), with a centre point at approximately 50.15445, -114.81111 (World Geodetic System 1984). The Project would be partially located on Castle Mountain (the peak in the Project mine area is referred to locally as Castle Mountain but is not officially named on provincial government mapping services) and partially within the currently permitted FRO operating area in order to use existing infrastructure and reduce new disturbance, where possible (Figure 5.1-1; see Figure 4.1-1 for the boundary of the pit shell). The Project would be located primarily on provincial Crown land subject to coal leases held by EVR, with portions of the Project on fee simple land owned by EVR (Figure 5.1-2). The legal description of the lands to be used for the Project is presented in Appendix C.

Access to the Project is north from Highway 3 via Highway 43 (Elk Valley Highway) from Sparwood to Elkford, then approximately 30 km north on Fording Mine Road. Other than use of the main access road for the transport of employees and deliveries and tie-in to existing power lines, the Project will not require new use of existing rights-of-way. More information on land use and tenure in the Elk Valley is provided in Section 9.4.1.3.

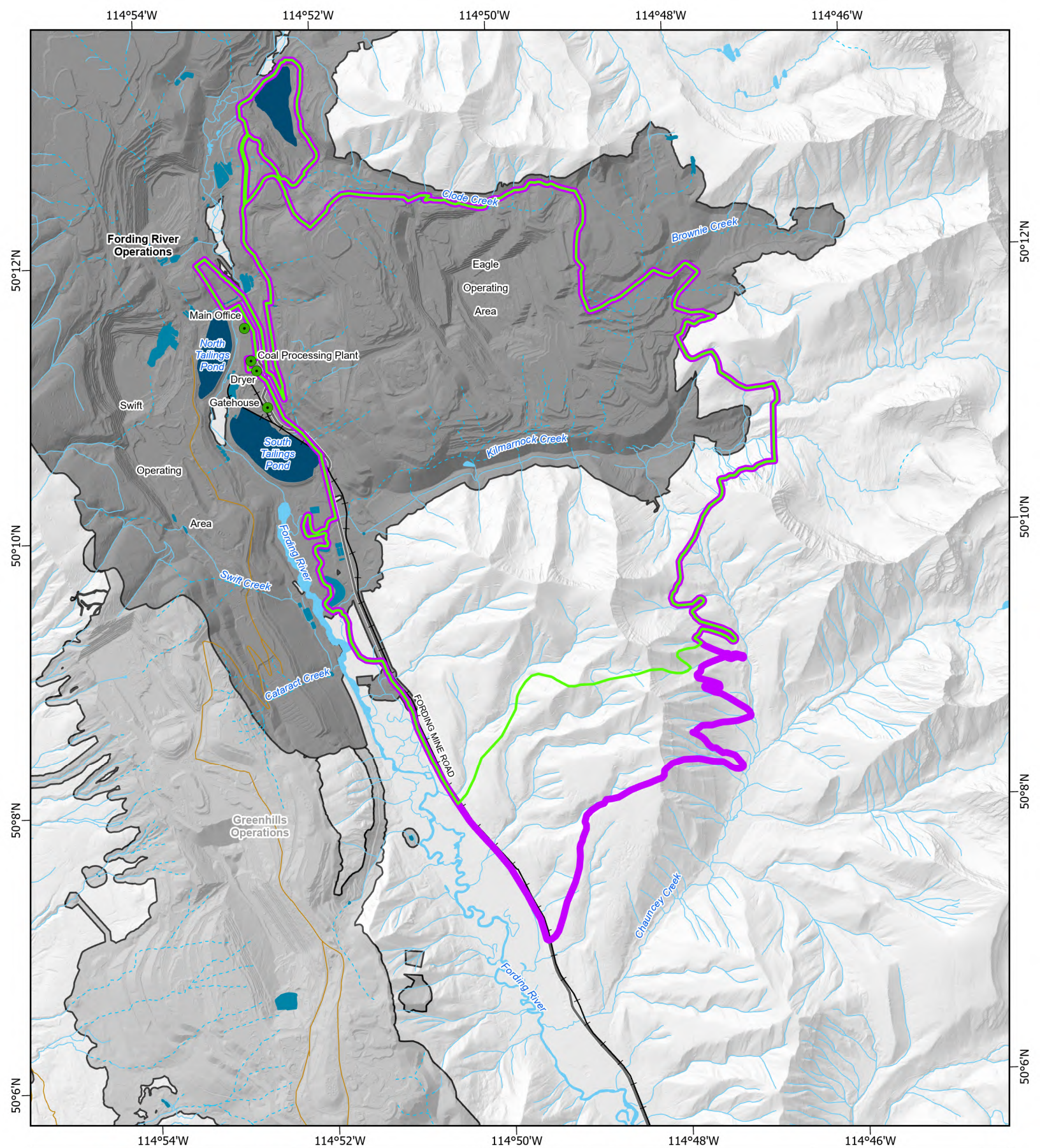
The Project would be located within ʔamakʔis Ktunaxa, the territory of the Ktunaxa Nation and within the Ktunaxa district of Qukin ʔamakʔis or Raven's Land. Qukin ʔamakʔis extends from the headwaters of the Elk River downstream to near the town of Elko, an area of more than 3,500 km^2. The Ktunaxa Nation is composed of Yaq̓it ʔa·knuqǂi'it (Tobacco Plains Band), ʔaq'am (St. Mary's Band), yaqan nuʔkiy (Lower Kootenay Band) and ʔakisq'nuk First Nation (Columbia Lake Band). The KNC Society is accountable to the Nasuʔkin and Council of the four Ktunaxa Member Nations. The goals of the KNC include preservation and promotion of Ktunaxa traditional knowledge, language and culture; community and social development and wellness; land and resource development; economic investment; and self-government. Ktunaxa Nation Council and Yaq̓it ʔa·knuqǂi 'it have been identified as the appropriate groups for consultation and engagement with respect to the Project by Ktunaxa. Locations important to the Ktunaxa Nation have been identified within 1 km of the Project, including locations in the Chauncey Creek watershed. EVR also recognizes that there are two Ktunaxa communities in the US: Ḵupawiɬq̓nuk (Confederated Salish & Kootenai Tribes) in Elmo, Montana, and ʔaq̓anqmi (Kootenai Tribe of Idaho) in Bonners Ferry, Idaho.

It is acknowledged that the traditional lands of other potentially affected Indigenous Peoples, including Shuswap Band, the Stoney Nakoda Nations, Piikani Nation, Siksika Nation, Kainai (Blood Tribe) and Tsuut'ina Nation, also overlap or occur in proximity to the Project. Indigenous reserve lands are located 35 to 130 km from the Project, with the closest Indigenous residential Community of Eden Valley (Stoney Nakoda) located approximately 40 km from the Project. Métis groups, including Métis Nation British Columbia, Elk Valley Métis and Otipemisiwak Métis Government, also have interests in the Elk Valley. Proximity of the Project to Ktunaxa

Nation and other potentially affected Indigenous Peoples' reserve lands is shown in Figure 5.1-3. Additional information about potentially affected Indigenous Peoples is presented in Section 7.0.

The closest Elk Valley residential community is Elkford, located approximately 30 km driving distance southwest of the Project. Sparwood is the next nearest Elk Valley residential community, approximately 60 km driving distance from the Project. Fernie, BC, and Crowsnest Pass, Alberta, are both approximately 100 km away from the Project. Locations of the above-noted communities are shown in Figure 1-2. The nearest seasonal residence is a trapper's cabin, located approximately 1.3 km away from the Project. More information on potentially affected public, government agencies and non-government organizations is presented in Section 8.0.

No federal lands will be used for the Project and there will be no direct Project impacts on federal lands. The nearest federal lands, referred to as the Dominion Coal Block (Parcels 73 and 82), are located approximately 70 and 80 km from the Project, respectively (Figure 5.1-4).



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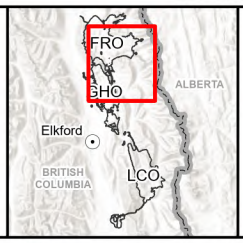


Figure 5.1-1: Project Footprint and Existing Fording River Operations (NTS 082J/02)

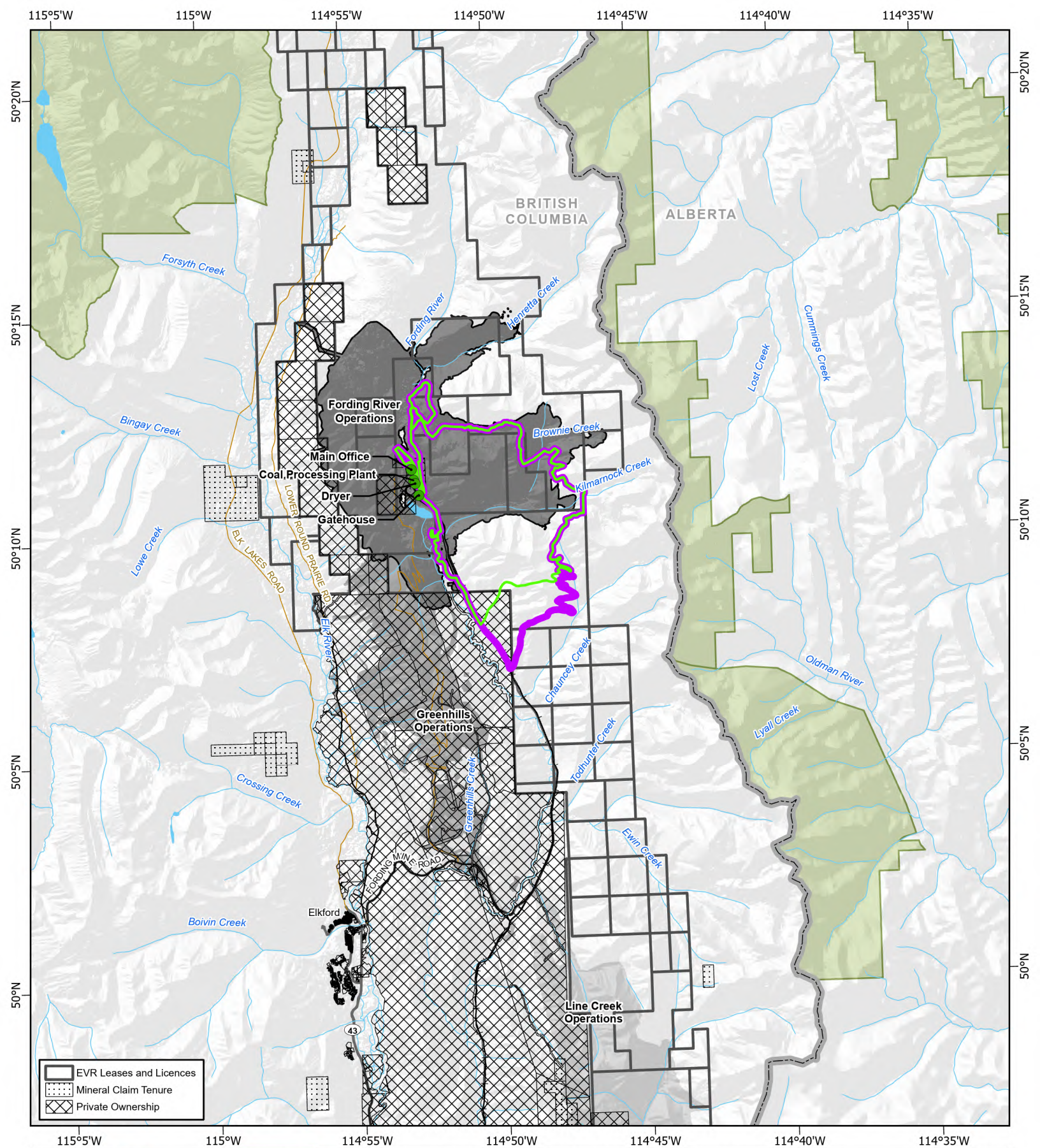
- Existing Facility
- Railway
- Road - Paved
- Road - Unpaved
- Surface Flow Watercourse
- Subsurface Flow Watercourse
- FRO C-3 Permitted Mine Area
- GHO C-137 Permitted Mine Area
- Project Footprint - Stage 1
- Project Footprint - Stage 1 + Stage 2
- Tailings Pond
- Waste Water/Sediment Pond
- Waterbody

N

1 km

DATE: 4/30/2025	MINE OPERATION: FORDING RIVER
SCALE: 1:65,000	COORDINATE SYSTEM: NAD 1983 UTM Zone 11N

Document Path: I:\CLIENTS\EVR\2025\CA0050291_7055\Mapping\03_DPD\CA0050291_7055_DPD_009_GIS_ProjectFootprint_ExistingFRO.aprx



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Figure 5.1-2: EVR Coal Leases in and Around the Project Footprint (NTS 082G/082J)

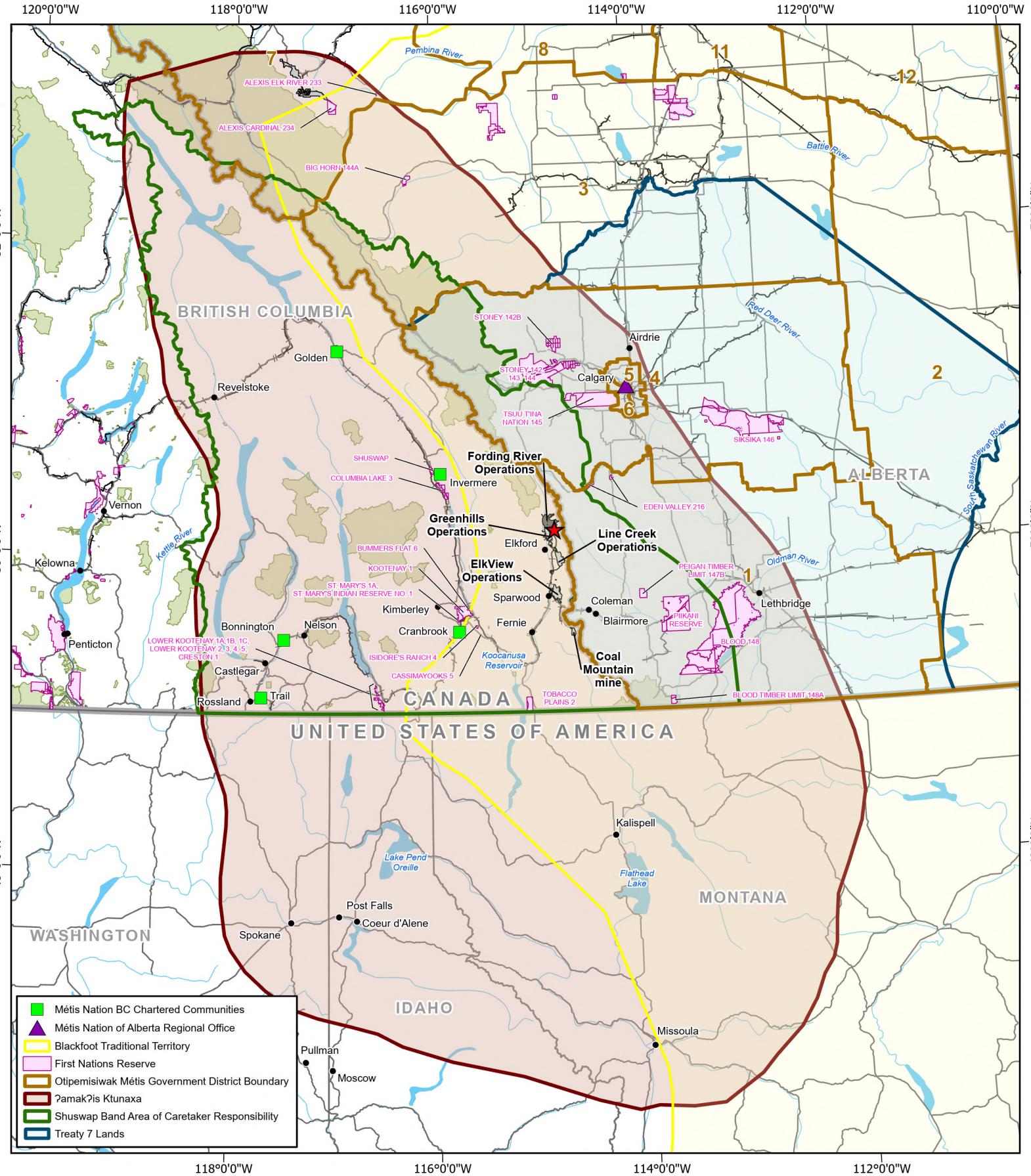
- City / Town / Community
- Existing Facility
- Railway
- Road - Paved
- Road - Unpaved
- Watercourse
- British Columbia - Alberta Boundary
- FRO C-3 Permitted Mine Area
- GHO C-137 Permitted Mine Area
- LCO C-129 Permitted Mine Area
- Project Footprint - Stage 1
- Project Footprint - Stage 1 + Stage 2
- Park/Protected Area
- Waterbody

N

4 km

DATE: 4/30/2025	MINE OPERATION: FORDING RIVER
SCALE: 1:200,000	COORDINATE SYSTEM: NAD 1983 UTM Zone 11N

Document Path: I:\CLIENTS\EVR\2025\CA0050291_7055\Mapping\03_DPD\CA0050291_7055_DPD_011_GIS_CoalLeases.aprx



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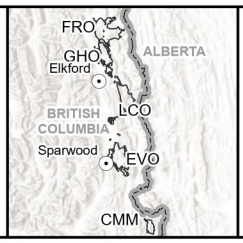


Figure 5.1-3: Proximity to Indigenous Reserves, Territories, Treaty Lands and Chartered Communities (NTS 071 L/M, 072 D/E/L/M, 073 D/E, 081 I-P, 082 A-P, 083 A-H)

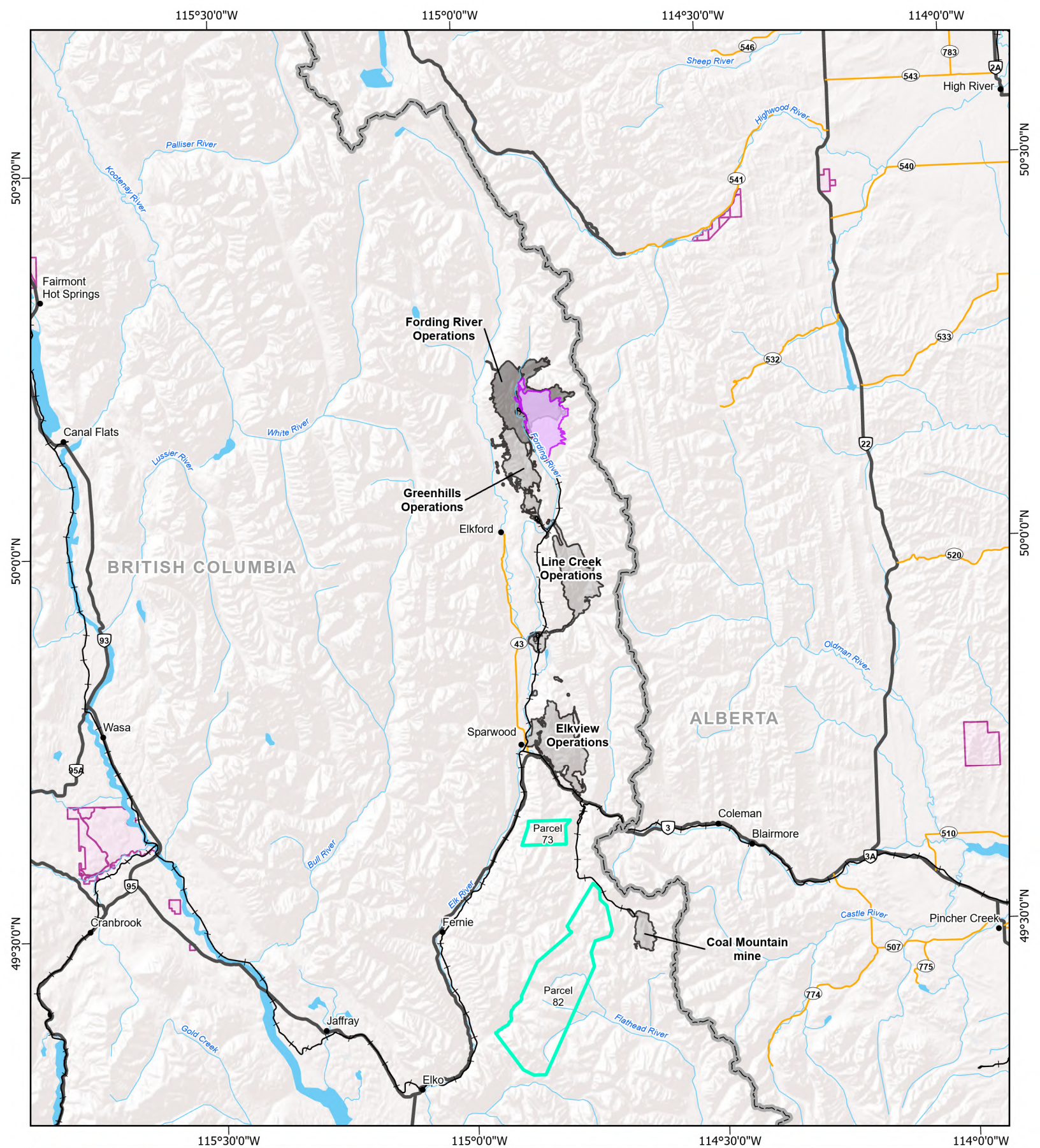
- City / Town / Community
- Project Location
- Railway
- Primary Highway
- Watercourse
- British Columbia - Alberta Boundary
- Coal Mining Operation
- FRO C-3 Permitted Mine Area
- International Border
- Provincial Park / Protected Area
- State Border
- Waterbody

75 km

N

DATE: 8/13/2025	MINE OPERATION: FORDING RIVER
SCALE: 1:3,500,000	COORDINATE SYSTEM: NAD 1983 UTM Zone 11N

Document Path: I:\CLIENTS\EVR\2025\CA0050291_7055\Mapping\03_DPD\CA0050291_7055_DPD_018_GIS_IndigenousLandsProximity.aprx



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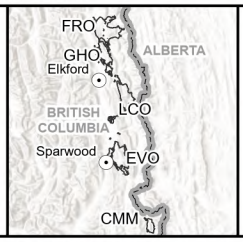


Figure 5.1-4: Proximity to Federal Lands (NTS 082G/082J)

- City / Town / Community
- Primary Highway
- Secondary Highway
- Railway
- Watercourse
- British Columbia - Alberta Boundary
- Coal Mining Operation
- Dominion Coal Block
- FRO C-3 Permitted Mine Area
- First Nations Reserve
- Project Footprint
- Waterbody

N

10 km

DATE: 5/1/2025	MINE OPERATION: FORDING RIVER
SCALE: 1:700,000	COORDINATE SYSTEM: NAD 1983 UTM Zone 11N

Document Path: I:\CLIENTS\EVR\2025\CA0050291_7055\Mapping\03_DPD\CA0050291_7055_DPD_019_GIS_FederalLandsProximity.aprx

5.1.2 Project Footprint

The Project footprint comprises the proposed new Project mine area, including Stage 1 and Stage 2 of the Project, and parts of the area currently permitted for FRO, as established by the FRO Permitted Mine Area[12] defined in FRO's C-3 Permit. The portion of the Project footprint within the current FRO Permitted Mine Area comprises an area of approximately 2,295 ha and includes the existing Eagle and Kilmarnock mine rock storage areas, the FRO Coal Processing Plant, the Turnbull TSF, and other support facilities (Figure 5.1-1). Project activities within the current FRO Permitted Mine Area would begin in Stage 1 and continue in Stage 2. The Project mine area (i.e., the area where steelmaking coal resources are to be mined) is located at Castle Mountain, south of the FRO Permitted Mine Area, east of the Fording River and in portions of the catchment areas of Clode Creek, Kilmarnock Creek, Chauncey Creek and a number of smaller unnamed tributaries to the Fording River. This area is outside the FRO Permitted Mine Area and comprises an area of approximately 1,386 ha for Stage 1 and a total of approximately 2,031 ha for Stage 1 and Stage 2. Clode Creek, Kilmarnock Creek and Chauncey Creek are situated in the Fording River drainage basin, a tributary of the Elk River. All of the receiving watercourses potentially influenced by the Project flow into the Fording River.

Since the provincial and federal IPD and the July 2021 DPD, significant efforts have been made to refine the mine design to incorporate feedback gathered through engagement and to reflect application of the BC Policy for Mitigating Impacts on Environmental Values and EVR's mitigation hierarchy (Section 10.0). This has resulted in refinements to the Project footprint shown in Figure Figure 5.1-5 (from the IPD to the July 2021 DPD) and Figure 5.1-6 (from the July 2021 DPD to the Revised DPD).

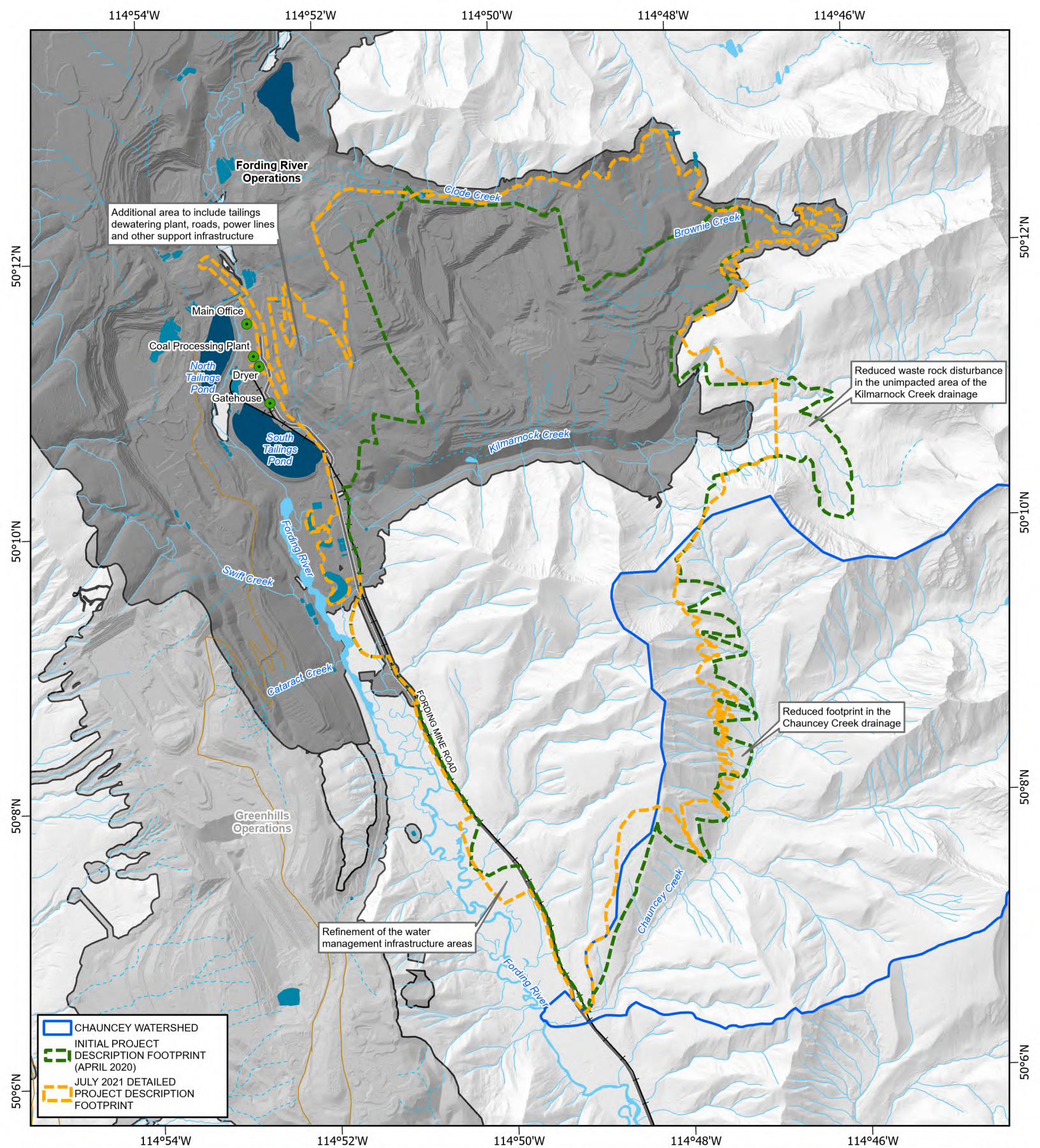
A summary of the refinements in the disturbance areas within Project footprint since the provincial and federal IPD documents and the July 2021 DPD is also presented in Table 5.1-1 and Table 5.1-2. The design refinements have resulted in reductions in the Project footprint outside of the C-3 Permitted Mine Area by approximately 445 ha compared to the provincial and federal IPD, and by approximately 222 ha compared to the July 2021 DPD. These include a reduced footprint in the Chauncey Creek drainage and in the unimpacted area of the Kilmarnock Creek drainage. The area within the existing C-3 Permitted Mine Area has increased by 683 ha compared to the provincial and federal IPD, primarily due to additional areas west of Eagle Pit for access and support facilities that were added for the July 2021 DPD. Compared to the July 2021 DPD, the Project footprint within the existing C-3 Permitted Mine Area has been reduced by 102 ha.

[12] Since publication of the provincial and federal IPD documents and the July 2021 DPD, the FRO Permitted Mine Area (previously the "C-3 Permit Area") has undergone changes imposed by the BC Ministry of Mining and Critical Minerals (BC MCM). As such, direct comparison of the Project footprint values presented inside and outside the FRO Permitted Area (this document) and inside and outside the C-3 Permit Area (as quoted in the IPD documents and July 2021 DPD) cannot be directly compared. Adjustments have been made in this Revised DPD to reflect the updated FRO Permitted Mine Area.

Table 5.1-1: Project Footprint Refinements Since the Initial Project Description and the July 2021 Detailed Project Description

Refinements from IPD to July 2021 DPD	Refinements from July 2021 DPD to Revised DPD
• Further planning for backfilling of the Eagle and FRX pits to reduce new disturbance and increase the amount of mined rock upstream of existing treatment infrastructure. • Refining the area for water management infrastructure, while avoiding sedimentation pond placements within the 500-year flood plain of the Fording River. • Minimizing the footprint in the Chauncey Creek drainage, considering geotechnical safety constraints. • Refining the areas of potential disturbance associated with potential mine rock run out and castover or fly rock from pit development. • Refining mine rock storage area plans to reduce disturbance including: ○ Reducing mine rock disturbance in the unimpacted area of the Kilmarnock Creek drainage outside of the existing C-3 Permitted Mine Area. • Accommodating the potential for dewatered tailings option by expanding the existing CCFR storage facility or new facilities within the Project footprint into areas previously considered for mine rock storage. • Refining the closure and reclamation design to support more natural and functional ecosystems, connectivity and progressive reclamation. • Identifying areas for supporting infrastructure that were not specifically identified in the IPD documents.	• Further refinement of the area for water management infrastructure by relocating south sediment ponds to the east of Fording Mine Road, thereby avoiding 7.8 ha of wetlands. • Further refinement of the pit shell and Project footprint to avoid impacts to Castle Mountain West Unnamed Stream 7 (Section 4.10). • Further refinement of the areas of potential disturbance associated with potential mine rock run out and castover or fly rock from pit development based on incorporating castover management best practices (Section 4.10). • Further refinement of the mine plan and mine pit design, further reducing the footprint in lower Chauncey Creek and the overall size of the footprint outside of the existing C-3 Permitted Mine Area (Section 4.10). • Further refinement to the mine plan and mine rock storage area design, resulting in a smaller area in the northeast corner of the Project footprint (Figure 4.3-1). • Further refinement of the northeast boundary of the Project footprint to include additional area that could be required for the Kilmarnock Clean Water Diversion (Section 5.3.4). • Further refinement to closure and reclamation design to support natural and functional ecosystems, connectivity and progressive reclamation. • Addition of FRO's existing explosives storage area northwest of the Project footprint; this area is included as part of the Project to allow the development of additional silos to reduce transportation distance for blasting operations for FRX (Section 4.8). • Addition of the Turnbull TSF north of the Project footprint; this area is included as part of the Project in the event the Project tailings strategy requires additional raises at the TSF (Section 4.5).

IPD = Initial Project Description; DPD = Detailed Project Description; TSF = tailings storage facility; CCFR = combined coarse and fine rejects; FRX = Fording River Extension; FRO = Fording River Operations.



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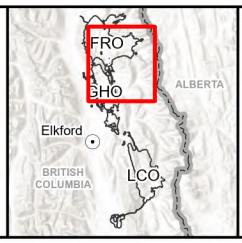


Figure 5.1-5: Comparison of Initial Project Description and July 2021 Detailed Project Description Footprints (NTS 082J/02)

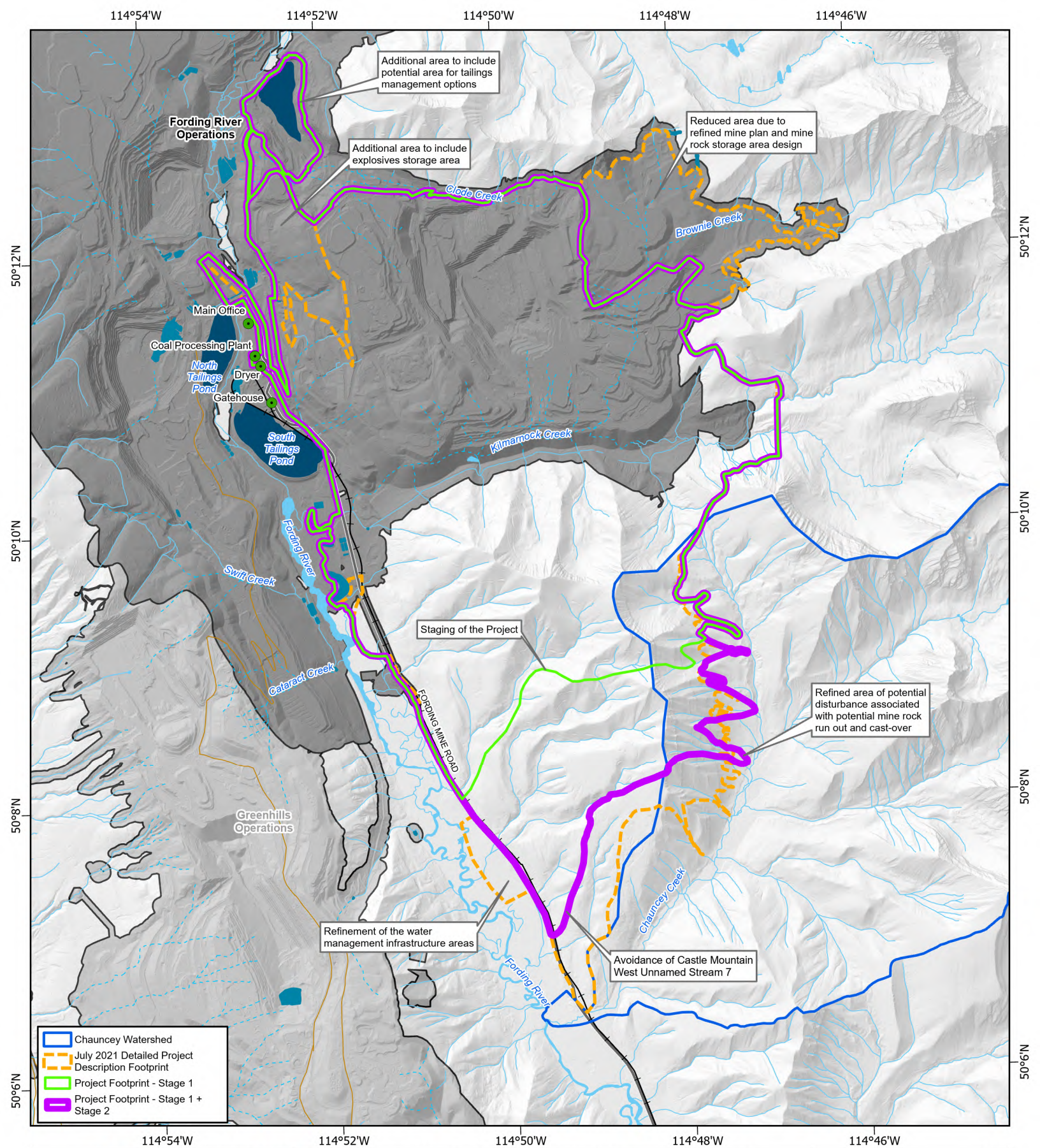
- Existing Facility
- Railway
- Road - Paved
- Road - Unpaved
- Surface Flow Watercourse
- Subsurface Flow Watercourse
- FRO C-3 Permitted Mine Area
- GHO C-137 Permitted Mine Area
- Tailings Pond
- Waste Water/Sediment Pond
- Waterbody

1 km

N

DATE: 4/30/2025	MINE OPERATION: FORDING RIVER
SCALE: 1:65,000	COORDINATE SYSTEM: NAD 1983 UTM Zone 11N

Document Path: I:\CLIENTS\EVR\2025\CA0050291_7055\Mapping\03_DPD\CA0050291_7055_DPD_010_GIS_ComparisonWithInitialProjDescFootprint.aprx



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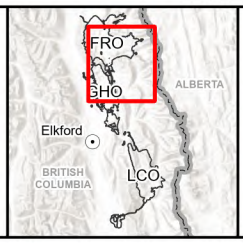


Figure 5.1-6: Comparison of Project Footprint and July 2021 Detailed Project Description Footprint (NTS 082J/02)

- Existing Facility
- Railway
- Road - Paved
- Road - Unpaved
- Surface Flow Watercourse
- Subsurface Flow Watercourse
- FRO C-3 Permitted Mine Area
- GHO C-137 Permitted Mine Area
- Tailings Pond
- Waste Water/Sediment Pond
- Waterbody

N

1 km

DATE: 4/30/2025	MINE OPERATION: FORDING RIVER
SCALE: 1:65,000	COORDINATE SYSTEM: NAD 1983 UTM Zone 11N

Document Path: I:\CLIENTS\EVR\2025\CA0050291_7055\Mapping\03_DPD\CA0050291_7055_DPD_021_GIS_ComparisonProjectFootprint_2021DPD.aprx

Table 5.1-2: Comparison of Project Footprint Disturbance Areas in the Initial Project Description, July 2021 Detailed Project Description and Revised Detailed Project Description[(a)]

Disturbance Location	IPD Document	July 2021 DPD	Revised DPD	
			Stage 1	Stage 1 + Stage 2
Outside the existing C-3 Permitted Mine Area	2,476 ha	2,253 ha	1,386 ha	2,031 ha
Inside the existing C-3 Permitted Mine Area	1,612 ha	2,397 ha	2,295 ha	2,295 ha
Total	4,088 ha	4,650 ha	3,681 ha	4,326 ha

a) Since publication of the provincial and federal IPD documents and the July 2021 DPD the FRO Permitted Mine Area (previously the "C-3 Permit Area") has undergone changes imposed by the BC MCM. Values in this table reflect updated areas relative to the FRO Permitted Mine Area and differ from those published in the IPD documents and July 2021 DPD.

IPD = Initial Project Description; DPD = Detailed Project Description

5.1.3 Project Summary

The Project as described in the Revised DPD consists of:

- mining of high-quality steelmaking coal resource from the Project mine area
- placement of mine rock mined from the Project in the completed pit in the Eagle mining area and in the Kilmarnock area to reduce the overall Project footprint as well as in the proposed FRX Pit when it becomes available for mine rock storage
- use of existing infrastructure at FRO such as the processing plant, access roads, power lines, gas lines and rail line to reduce the construction timelines and impact to previously undisturbed areas
- use or adaptation of existing and planned water management infrastructure and treatment facilities to reduce the Project footprint and mitigate environmental impacts
- extension of existing and planned tailings materials handling and storage infrastructure to leverage existing environmental management systems
- incorporation and alignment of Project plans with existing FRO and EVR regional environmental management and monitoring plans and programs
- development of new Project support infrastructure such as satellite office(s), maintenance facilities and explosives storage

As noted, the Project would rely on existing infrastructure at FRO. Existing FRO components and activities that would support the Project include:

- coal processing plant facilities with associated coal stockpiles, tailings handling and storage, and water treatment and sewage facilities
- office, warehouse and maintenance facilities
- explosives storage, manufacturing and delivery systems
- access roads (Fording Mine Road), rail spur, power and utilities
- mining equipment including drills, shovels and haul trucks

These existing facilities have the necessary permits and approvals required for their operation.[13] However, as noted in Sections 4.5 and 4.8, some activities are needed to supplement infrastructure related to tailings and explosives storage. As the Project represents a supply of new coal reserves to sustain the existing operation at current production levels, the Project will not require additional plant capacity beyond its current design and approved operating conditions and will not result in an increase to the current operational production capacity.

New Project-specific components and activities, for both Stage 1 and Stage 2 of the Project, include:

- lay-down areas and access roads in the Project mine area
- satellite office(s); warehouses; and maintenance, fuelling and other support facilities (non-potable water for new buildings within the Project footprint could be supplied from a new water well with a new licence)
- linkages to FRO power and utilities (a short extension, transformers and distribution lines would be required to connect Project components to the existing FRO power supply)
- explosives magazine(s) and storage
- mine pit
- mine rock storage areas
- coal stockpile and sorting areas
- coal and mine rock materials handling facilities
- tailings management and storage with the potential to transition to a dewatering system
- water management systems and infrastructure

All Project components, both new and existing, will be described as part of the IS/A.

5.1.4 Project Benefits

EVR's steelmaking coal operations in southeast BC contribute to the local economies in the Elk Valley and East Kootenay Region in BC and Crowsnest Pass in Alberta. EVR's Elk Valley operations employ approximately 5,000 people, including 1,500 at FRO (Teck 2023a). Many of those employed are from the local communities, contributing to the local and provincial economies and tax bases. Elk Valley residents filled approximately 52% of the total employment at FRO, including 100% of senior management roles.

Early Engagement Feedback Note

Early engagement on the Project included feedback about possible positive Project impacts to the local and regional economy.
This section provides a discussion regarding anticipated positive Project impacts to the local area, the region, British Columbia and Canada.

During 2022, Teck estimated that the economic activity stimulated by its global operations generated $3.4 billion in taxes and government revenues annually to federal, provincial and municipal governments across Canada at direct, indirect and induced levels of contribution. Teck's direct GDP contributions were estimated to account for 23% of Canada's mining sector GDP (Teck 2023a). In 2022, Teck steelmaking coal operations generated $6.7 billion in direct economic contributions,

[13] Section 6.4 discusses the existing permits and approvals for FRO that would need to be amended for the Project.

including GDP, labour income and government revenue. As a result, the steelmaking coal business unit accounted for 57% of Teck's $15.0 billion revenue and 78% of its $7.0 billion gross profit (Teck 2023a).

In 2023, Teck produced 23.7 million tonnes of steelmaking coal, representing approximately 85% of Canada's total production (Teck 2024b), of which FRO accounts for nearly 35%. In 2023, Teck's Elk Valley operations spent over $90 million with suppliers who self-identified as Indigenous (Teck 2024a). In the same year, the Elk Valley operations contributed $3.5 million in community investment.

The Project would extend the life of FRO, helping to meet market demand for steelmaking coal as well as generating new and sustaining existing employment and economic benefits. As noted in Section 2.1, steel demand will be driven by increasing economic growth and urbanization, particularly in high-growth regions and in other developing economies, where 2 to 3 billion people are projected to join the global middle class by 2050. Wood Mackenzie forecasts a global steelmaking coal supply deficit of 120 million tonnes by 2050 (Wood 2024). This forecasted deficit relies on growth in blast furnace technology using steelmaking coals, developed countries transitioning to greener technologies and depletion of resources at existing operations. The FRX Project would help mitigate these supply deficits for the global market supply.

During construction, the Project would create several hundred direct jobs as well as additional indirect and induced jobs. A large portion of direct construction employment would be sourced from contractors within the Elk Valley region. The Project would also extend existing direct (as well as indirect and induced) operational employment for the FRO workforce as workers shift from other mining areas at FRO to the Project. With the extended life of mining operations, future local employment opportunities will become available for others as existing operational workers retire.

Direct, indirect and induced employment generated during construction and sustained during operations would contribute to regional and local incomes and wage earnings. On-the-job and specialized training and skill development opportunities provided to the Project workforce would continue throughout operations, contributing to the skills and capacity of the local labour force and business community.

During construction, the Project would also generate additional direct, indirect and induced supplier revenues for local and regional businesses, including opportunities for Indigenous businesses, and would continue to generate these revenues throughout operations. A modest portion of supplier revenues and indirect employment would accrue to the broader national economy from Project procurement of goods and services outside of BC.

Incremental provincial tax revenues will accrue during construction and continue throughout operations through taxation of Project-associated employment income, taxes on products, carbon taxes and corporate income tax in conjunction with business revenues earned from the Project. The Project will also generate payroll and income taxes payable to Canada, representing an additional contribution to federal and provincial government revenue streams. During operations, tax revenues from EVR's annual contribution to the Elk Valley Property Tax Sharing Agreement and Mineral Tax revenue would continue at a similar level to FRO's current annual average contributions.

The injection of new economic benefits during Project construction and the continuation of existing operational economic benefits through to the early 2060s would contribute to individual and family well-being by providing a source of ongoing employment and relatively high incomes. Workers would continue to benefit from training and

skill development, supporting the long-term development of human capital in the area. The Project would continue to support the local population base and economy.

In addition to the above economic benefits, the Project would support EVR's continued implementation of policies and practices that support local communities, including those supporting hiring and the procurement of goods and services from local communities and potentially affected Indigenous Peoples. Policies and practices related to housing, service and infrastructure investments, and healthy living offer benefits to local communities beyond employment and contracting.

By sustaining the FRO workforce, local procurement, and EVR's economic, social and environmental initiatives, both Stage 1 and Stage 2 of the Project are expected to continue to support sustainable development of communities in the Elk Valley and the East Kootenay Region. EVR will continue to support local workers and businesses through various programs, including working collaboratively with KNC and Yaq̓it ʔa·knuqƛi ʼit to identify and implement opportunities for employment and participation by Ktunaxa Nation businesses in the provision of goods and services (Section 7.1). As outlined in Section 2.1, EVR expects robust demand for steelmaking coal globally and continued demand for local employment and contracting supporting production.

5.1.5 Project Schedule

The assessment of the Project is expected to occur over the next three years, with decisions by the Minister under Section 60(1) of the IAA and by the Ministers under Section 29(4) of the BC EAA made in Q3 2028. Decisions by statutory authorities for subsequent permits required to commence construction are anticipated in Q4 2028. Additional information about the proposed assessment schedule is presented in Section 6.5.

Construction for Stage 1 would occur from Q4 2028 through to 2031. Stage 1 mining operations would follow from Q4 2030 through to 2053, with a decline in coal production after 2044 from Stage 1. Construction for Stage 2 would occur from 2044 to 2046, followed by Stage 2 mining operations from 2046 to 2065. The estimate of the working life of the mine is based on the current average annual coal production rate at FRO of approximately 9 Mmtcc/yr. At the end of the mine life, Project activities will include reclamation and active closure, which is likely to occur over a period of at least five years. The post-closure duration is expected to continue until other uses of the land commence and would include ongoing operation of water management infrastructure for as long as it is needed to support water quantity/quality objectives.

Representative mining milestones are presented in Section 5.3.2.

5.2 Deposit Geology and Resource Characterization

This section of the Revised DPD provides supporting information about the geological resource for the Project. This information supports the Project need and purpose presented in Section 2.2 and the rationale for the Project mine plan in Section 5.3. For a broader discussion of the regional physical environment, refer to Section 9.2.

EVR understands the geology and resources in the area of the Project. EVR has more than 50 years of geological exploration data confirmed by more than 50 years of mining to the north, west and south of the

Project mine area at Castle Mountain[14] in the Elk Valley coalfields. Within the Project mine area itself, the first exploration hole was drilled in 1969. Further exploration has occurred intermittently over the years with a recent increase in drilling intensity to provide a detailed delineation of the resource for Project planning purposes.

The Project would mine coal from the Elk and Mist Mountain formations. Layers of rock surrounding the coal seams need to be removed as mine rock. This process of mining the mine rock and coal can result in exposure of the material to weather and interaction with the environment.

Understanding the character of the rock layers allows EVR to design an economical and safe mine as well as to predict how the mining could influence key environmental factors. EVR understands the geochemical characteristics of the potential mine rock including selenium and potential acid generation and will seek to minimize and mitigate potential impacts.

In general, the geology in the vicinity of the Project consists of Cretaceous- to Jurassic-aged sedimentary rocks of the Kootenay Group and Fernie Formation. The following sections provide further discussion of the stratigraphy and structure found in the area.

5.2.1 Stratigraphy

A general overview of the stratigraphy in the Project mine area at Castle Mountain is presented in Table 5.2-1.

Table 5.2-1: Stratigraphy in the Project Mine Area

Period	Litho-Stratigraphic Units			Principle Rock Types
Recent				colluvium
Quaternary				clay, silt, sand, gravel, cobbles
Lower Cretaceous	Blairmore Group			massive bedded sandstones and conglomerates
Lower Cretaceous to Upper Jurassic	Kootenay Group	Elk Formation		sandstone, siltstone, shale, mudstones, chert pebble conglomerate, minor coal
		Mist Mountain Formation		sandstone, siltstone, shale, mudstones, thick coal seams
		Morrissey Formation	Moose Mountain Member	medium to coarse-grained quartz-chert sandstone
			Weary Ridge Member	fine to coarse-grained, slight ferruginous quartz-chert sandstone
Jurassic	Fernie Formation			shale, siltstone, fine-grained sandstone
Triassic	Spray River Formation			sandy shale, shale quartzite
	Rocky Mountain Formation			quartzite
Mississippian	Rundle Group			limestone

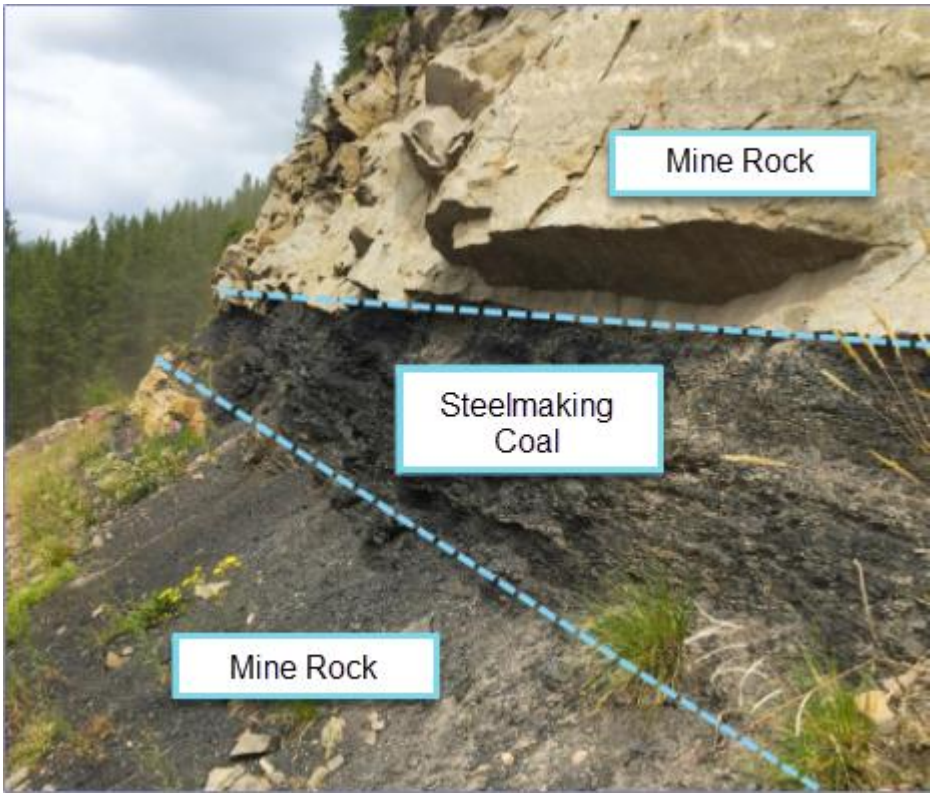
The main geological units the Project would mine are described below:

- The Fernie Formation is the oldest unit that would be mined by the Project. The Fernie Formation is predominantly made up of shales and siltstones. The Passage Beds mark a conformable contact with the overlying Morrissey Formation.

[14] Mining occurs at FRO to the north of the Project, GHO to the west of the Project and LCO to the south of the Project.

- The Morrissey Formation, which is the basal sandstone of the Kootenay Group, is a prominent cliff-forming marker horizon in many locations. The Morrissey Formation includes the Weary Ridge and Moose Mountain Members. In the Project mine area, the top of the Moose Mountain Member is in sharp contact with 1-0 seam, the lowermost bed of the Mist Mountain Formation.
- The Mist Mountain Formation contains the majority of economic coal seams and is the most widely occurring formation on the FRO property. This economically important formation is an interbedded sequence of sandstones, siltstones, silty shales, mudstones and medium to high volatile bituminous coal seams. The volatile content of the coal increases up section, with decreasing rank. Lenticular sandstones comprise about 1/3 of the Mist Mountain sediments at FRO, but very few laterally extensive sandstone beds exist. There are three sandstones that lie immediately above and below two of the coal seams that are the most persistent units and are often cliff-forming marker horizons (Photo 5.2-1).
- The Elk Formation conformably overlays the Mist Mountain Formation. In the Project mine area, the Elk Formation is commonly a succession of sandstones, siltstones, shales, mudstones, chert pebble conglomerates and sporadic, thin, high volatile bituminous coal seams. The Elk Formation is observed near the top of Castle Mountain, generally on the peaks west of the dominant ridge.
- The top of the Elk Formation marks the upper boundary of the Kootenay Group, which is unconformably overlain by the basal member of the Blairmore Group. This thick-bedded, cliff-forming sandstone and conglomerate unit has not been observed in the Project mine area.

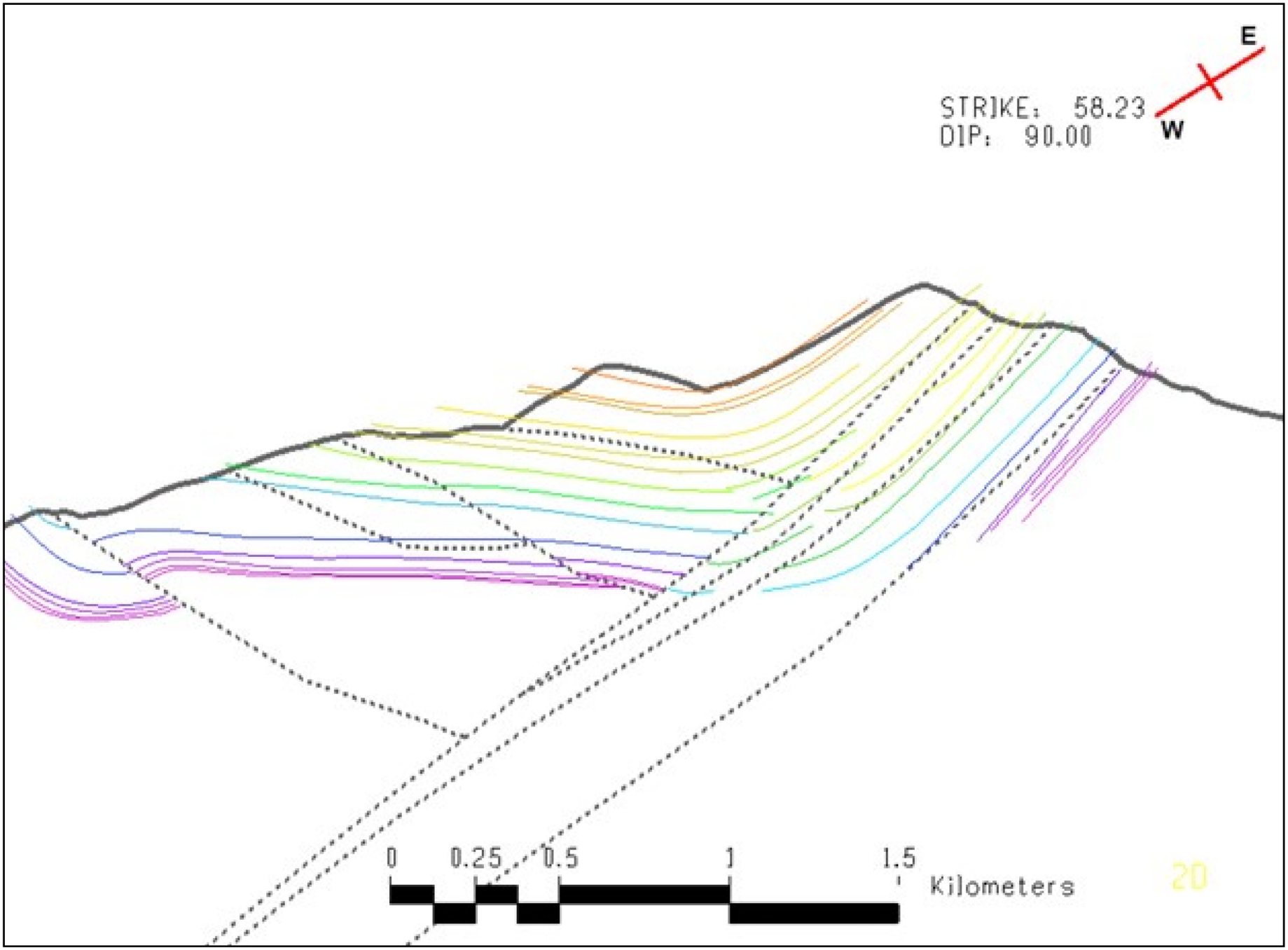
Photo 5.2-1: Cliff-Forming Sandstone Overlying a Coal Seam



5.2.2 Structure

After deposition, the sediments were involved in the mountain building movements of the late Cretaceous to early Tertiary Laramide orogeny. This uplift of sediments helped create a fold and thrust belt that characterizes the structure of the Project mine area, the Lewis Thrust Sheet, which is bounded by the Bourgeau Thrust Fault to the west and Lewis Thrust Fault to the east.

The major structural features at the Project mine area are the north–south trending Alexander Creek Syncline with near-horizontal-to-steep west-dipping thrust faults along the east limb of the syncline and moderate-to-steep east-dipping backthrust faults along the west limb of the syncline (Figure 5.2-1). Some of the thrust faults were likely folded late in the tectonic cycle during the late Cretaceous to early Tertiary period. The Ewin Pass Fault is the most important fault in the Project mine area. Considered the “Main Fault” in the Project, it is a large regional thrust fault that cuts through the east limb of the Alexander Creek Syncline and has resulted in significant localized coal seam repetitions and offsets. The strata near the Ewin Pass Fault is steeply dipping to the west (Photo 5.2-2) and presents a design constraint as discussed in Section 5.2.4.



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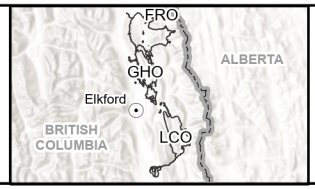


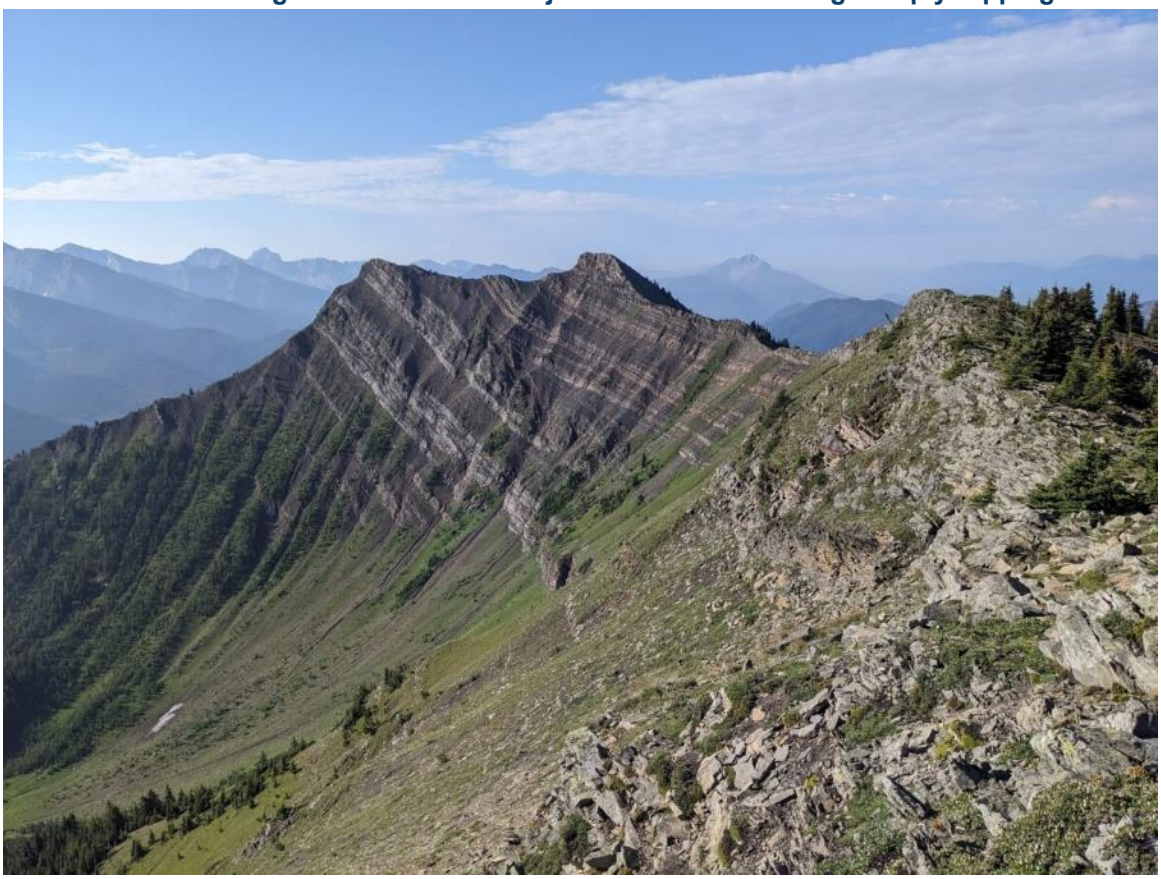
Figure 5.2-1: Geology Cross-Section at the Project Mine Area Looking North

Topography
Faults
Coal Seams

DATE: 4/23/2025	MINE OPERATION: FORDING RIVER

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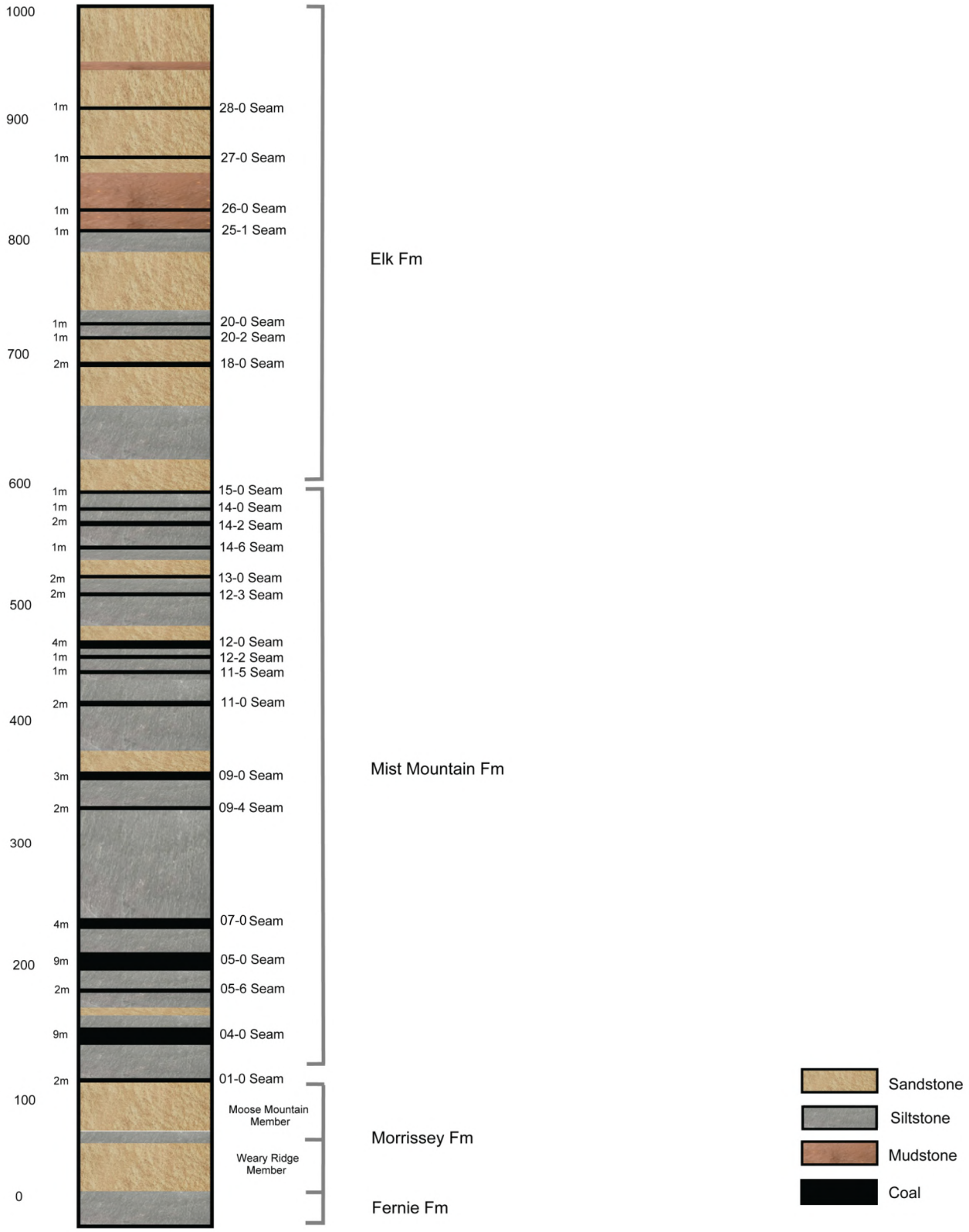
Photo 5.2-2: Height of Land in the Project Mine Area Showing Steeply Dipping Strata



5.2.3 Resource

The coal in the Project mine area at Castle Mountain is named in the same manner and shares many structural features as the Eagle Mountain deposit directly north of the Project mine area. Fording River Operations has been mining this deposit continually over the last 50 years; it is made up of over 30 coal seams separated into major fault blocks. Two of these major fault blocks can be seen in the deposit within the Project mine area. Coal seams are identified by a bottom-up naming convention, with 1-0 Seam being the bottom of the Mist Mountain Formation and 15-5 hanging wall being the top of the formation (Figure 5.2-1 and Figure 5.2-2). The Elk Formation starts stratigraphically above the 15-5 hanging wall and has several seams that are generally thinner and higher in volatile matter compared to the seams within the Mist Formation. The major coal seams in the deposit are 4-0, 5-0, 7-0, 11-0, 12-0 and 13-0. These six seams make up over 45% of the resource in the Project mine area.

There are 405 historical drill holes on Castle Mountain, 133 of which have been drilled since 2018. Drilling in the Project mine area dates back to 1969 when some of the original drilling was done on the Fording River property. Drilling has been on and off in the Project mine area since then, with significant work done in the mid-1990s and early 2000s. Testing of the coal from the Project mine area shows the coal to be of similar quality to Eagle Mountain coal.



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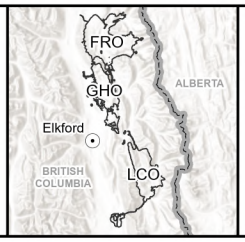


Figure 5.2-2: Stratigraphic Column within the Project Mine Area

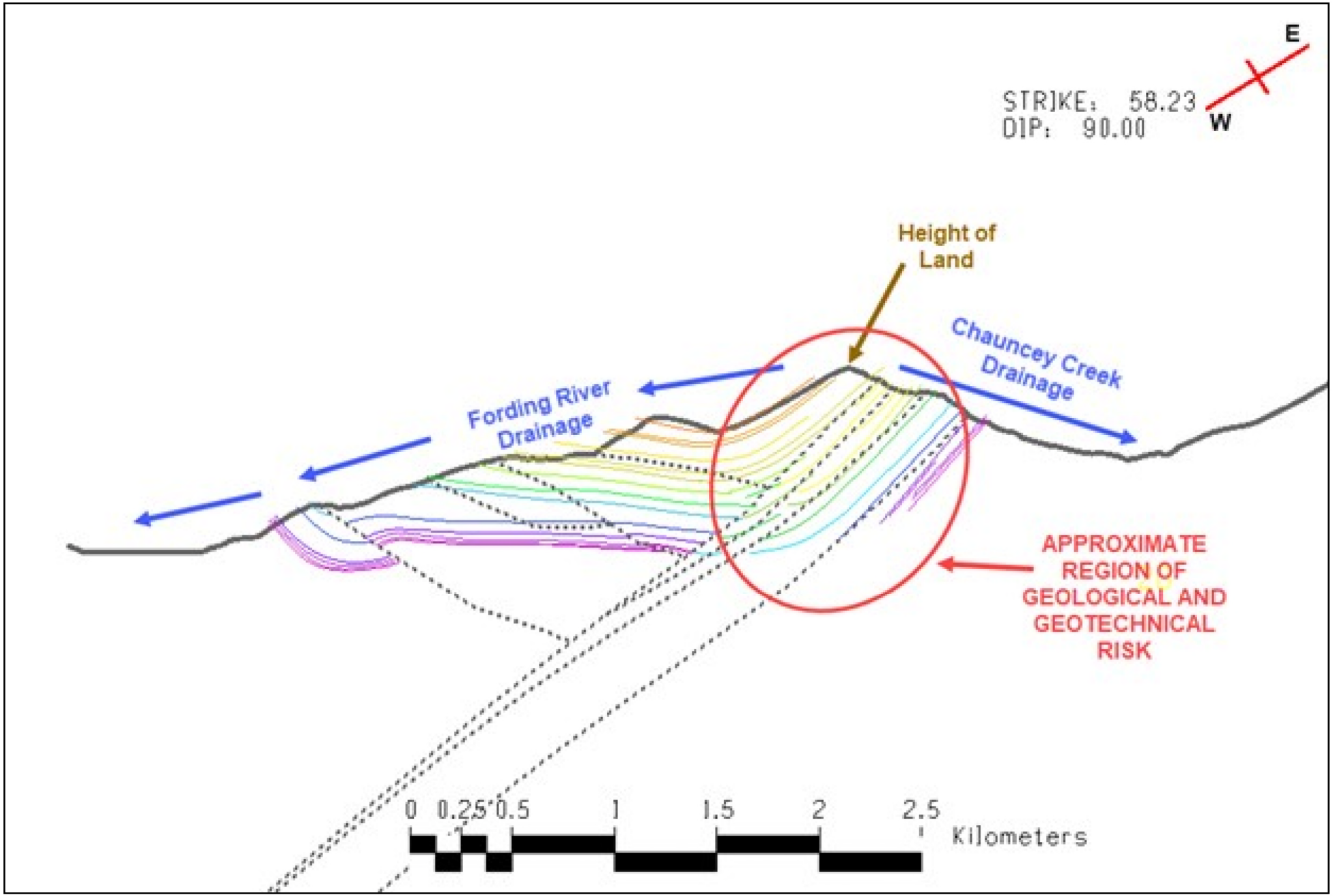
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5.2.4 Geological and Geotechnical Constraints on Mine Design

Project design is constrained by the geological and geotechnical conditions at Castle Mountain within the vicinity of the Project mine area. The main constraint on mine design is the relatively central location of the Main (Ewin Pass Thrust) Fault and the steep west-dipping strata that characterizes the east limb of the Alexander Creek Syncline at height of land (Figure 5.2-3).

The fault and the steeply dipping strata in the height of land between the Fording River drainage and the Chauncey Creek drainage influence the overall size and shape of the proposed mine pit. The eastern edge of the pit cannot be set in the region of the Main Fault, or the steeply dipping strata would make the pit unstable and unsafe. The pit wall needs to be set sufficiently east to avoid being set through the weakened damage zone associated with the Main Fault. Additionally, the steeply dipping strata require designing a mine pit with benching, offsets and removal of enough mine rock to achieve a stable wall. These conditions create safety and economic constraints primarily for the pit shell design, as described in Section 4.10.



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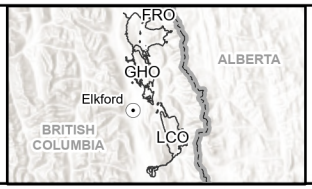


Figure 5.2-3: Region of Geological and Geotechnical Design Constraints Looking North within the Project Mine Area and Vicinity

Topography
Faults
Coal Seams

DATE:	MINE OPERATION:
4/23/2025	FORDING RIVER

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5.3 Mine Plan

This section presents the mine plan for the Project, including mining sequence. The mine plan considers:

- supplying the FRO Coal Processing Plant with a sufficient quantity and quality of coal feed to sustain current capacity and products
- balancing raw strip ratio and haul distance to maintain mine economics and consistent haul truck and shovel requirements
- utilizing progressive pit backfilling where practicable to reduce Project footprint and optimize mine haul distances
- utilizing mine design techniques that lessen the effects of mine rock placement and other mining activities on water quality
- utilizing progressive reclamation and land use objectives for closure
- balancing technical feasibility (e.g., geotechnical, operational factors) with economic, social and environmental sustainability

Early Engagement Feedback Note

Early engagement on the Project has resulted in significant modifications to the mine design and FRX pit. These changes have led to a reduction of 1 Bbcm of mine rock. A description of how these changes effect the mine design and how mine rock and water will be managed is provided in this section.

As with Project components and activities, the mine plan may be adjusted in response to information that becomes available through the assessment of the Project. Such refinements would be documented in the IS/A.

The Project is expected to generate approximately 280 Mmtcc[15] of steelmaking coal and 3.1 Bbcm of mine rock. This is a reduction in clean coal and mine rock from the previous mine plan in the July 2021 DPD of 92 Mmtcc[15] (24% reduction) and 1 Bbcm (24% reduction), respectively. Overall, the clean strip ratio (i.e., the ratio of the volume of overburden or mine rock moved relative to the tonnage of clean coal produced) for the Project is expected to be approximately 11, which is similar to average strip ratio for FRO, and less than the July 2021 DPD of 12.The mine rock material will be hauled to mine rock storage areas and the coal will be hauled to the coal processing facilities.

5.3.1 Construction

Construction comprises the main activities required to prepare for production of coal from the Project. Construction activities are scheduled to begin in 2028, subject to regulatory approvals and obtaining required provincial permits (Year 0). Generally, construction activities will be sequenced according to the timing of pit developments, beginning in the north and moving progressively to the south as required to implement the mine plan and maintain the production schedule. The first 2 to 3 years of the Project (Years 0 to 3) will be dedicated to construction activities. Construction activities will continue as needed to support ongoing production as the pit is developed to the south. Construction activities may be completed by contractors; thus, new hiring is not expected for the construction activities.

[15] Reported quantity includes Proven Mineral Reserves, Probable Mineral Reserves, and Inferred Mineral Resources within the constraining volume of the life-of-mine design. Mineral Resources are not Mineral Reserves and do not have demonstrated economic viability. Quantities expressed as clean coal tonnages (mtcc) are for discussion purposes only.

The general order, with most construction activities occurring in parallel, includes:

- construction of initial surface water management structures, erosion prevention and sediment control measures, including drainage ditches and new sediment pond that will flow into the Kilmarnock Settling Ponds Phase 1 and 2 to provide increased settling capacity
- site preparation, including timber harvest and clearing
- access road construction
- salvaging of areas with suitable soils where safe to do so
- construction of a new Kilmarnock Clean Water Diversion
- construction of power lines including main and distribution lines, a substation and transformers
- construction of satellite facilities to support mining operations
- pre-benching of the northern portion of the Project mine area

5.3.2 Development of FRX Pit

The Project will be developed progressively over the course of the Project life. As described in Section 4.2, mining in FRX Pit would start in the north and progress to the south. The mining direction is influenced by haul distance and the mine rock storage locations (Section 5.3.3), focusing on progressive backfilling into previously disturbed areas when practicable and avoiding direct mine rock placement in the Chauncey Creek drainage. More specifically, the Project is bound to the east (Chauncey Creek), south (Chauncey Creek) and west (Fording River, which is a predominant factor in starting development in the north). Development would be staged and the Project is designed to support progressive reclamation such that reclamation can start early and continue through the life of the Project.

Representative activities/milestones for the Project are summarized in Table 5.3-1 and shown in Figure 5.3-1 through Figure 5.3-7.

Fording River Operations production will shift to the Project from existing operating areas as they are projected to be exhausted in the mid-2030s. Mining activities at the Project would continue until the planned end of Project operations in the early 2060s, assuming the conditions to move to Stage 2 are met (Section 4.10).

Table 5.3-1: Representative Years of Development

Year	Mining Description
Year 0 (expected in 2028)	Commencement of early earthworks: • necessary water management structures are put in place as required • timber and brush within the footprint of the initial mining activities in the northern portion of the Project mine area are cleared and soil is salvaged and stockpiled or directly placed • preliminary access to the top of early FRX stages is established • more substantial access is established • supporting facilities and infrastructure constructed • appropriate personnel and materials are mobilized, some of which will be in standby in anticipation of permits to expedite the development of the Project

Table 5.3-1: Representative Years of Development

Year	Mining Description
Year 0–Year 4	Primary early predevelopment earthworks in the first FRX stages are mainly complete with the primary mine rock storage in Kilmarnock. Fording River Operations begin shifting resources to the Project. Timing depends on execution strategy and contract equipment support. Coal is being delivered to the processing plant from initial areas of mining. Power is supplied to the Project.
Year 4–Year 9	Mine rock from the initial areas of mining are being sent to Kilmarnock and Eagle Pit Backfill.
Year 9–Year 14	Mining areas are sending mine rock to Kilmarnock, Eagle Pit Backfill and FRX Pit Backfill. Progressive reclamation can begin and continue through the life of the Project.
Year 14–Year 24	Sequence is set up for progressive backfilling into FRX Pit.
Year 16	Confirmation that conditions are met to move to Stage 2 of the Project is required no later than Year 16. As the mine stages extend south, further tree clearing and soil salvage are done in conjunction with development of required infrastructure and access.
Year 24–Year 34	Mining areas are sending mine rock to progressive backfilling in FRX Pit with a proportion of mine rock still reporting to Eagle and Kilmarnock.
Year 34–End of Mining (early 2060s)	Mining is concluding, mine rock is being sent to progressively backfill FRX Pit. Reclamation activities continue.

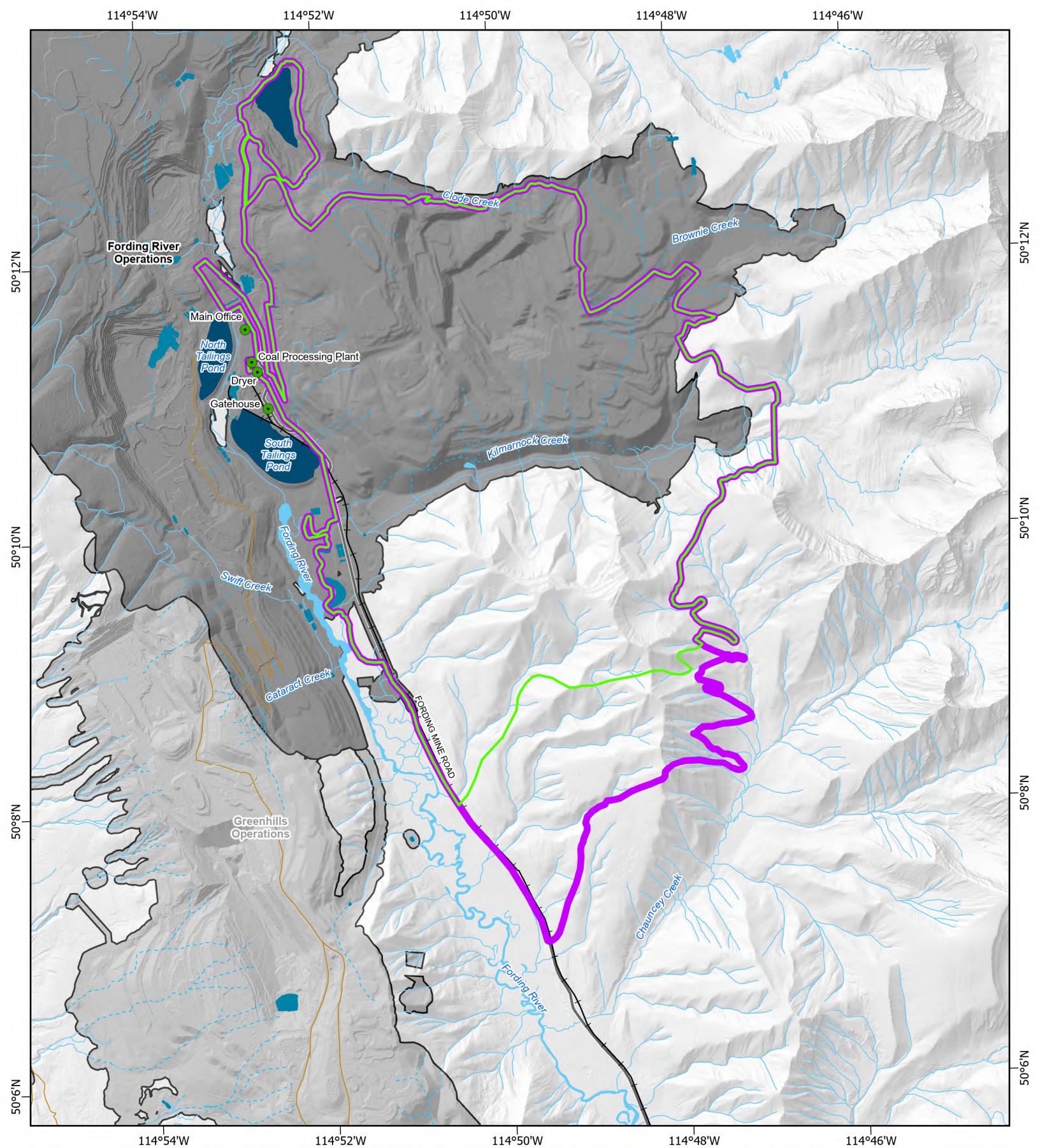
FRX= Fording River Extension

As pit development progresses from north to south, exploration activities such as geotechnical drilling and road building would continue within the Project footprint south of the active pit area in preparation for the subsequent pit development within the Project footprint. Other activities that would occur south of the active pit area within the Project footprint include timber harvesting, soil removal, power line extension, water management facilities construction and other infrastructure development in advance of the subsequent pit development.

Pit walls and mine rock storage areas will be designed to appropriate geotechnical parameters given the stage of the Project. EVR has extensive experience in designing pit and mine rock storage for the Eagle Pit at the existing FRO, which has similar geology and design features as the FRX Pit. Geotechnical evaluations are ongoing as data are collected and interpreted.

Coal from FRX Pit would be transported to the existing FRO Coal Processing Plant, while mine rock material would be transported to the mine rock storage areas (Section 5.3.3). The mine plan assumes that conventional haul trucks, similar to those currently in use at FRO, would be used for material handling for both coal and mine rock. However, as described in Section 4.61.1, other material handling options such as autonomous haul trucks, trolley assist and conveyors will continue to be evaluated.

The average annual mine rock haul distance for the Project is about 6 km. The mine plan is based on using a fleet of smaller trucks and equipment to haul and dozer-push material in the initial stages of production, then eventually shifting towards use of the existing FRO fleets on the Project. Various support equipment such as tracked dozers, rubber-tired dozers and excavators will be drawn from the existing fleet or added as necessary.



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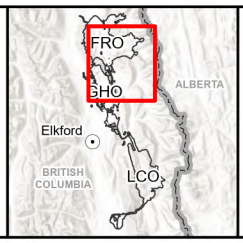


Figure 5.3-1: Representative Mine Sequence - Starting Surface (Year 0) (NTS 082J/02)

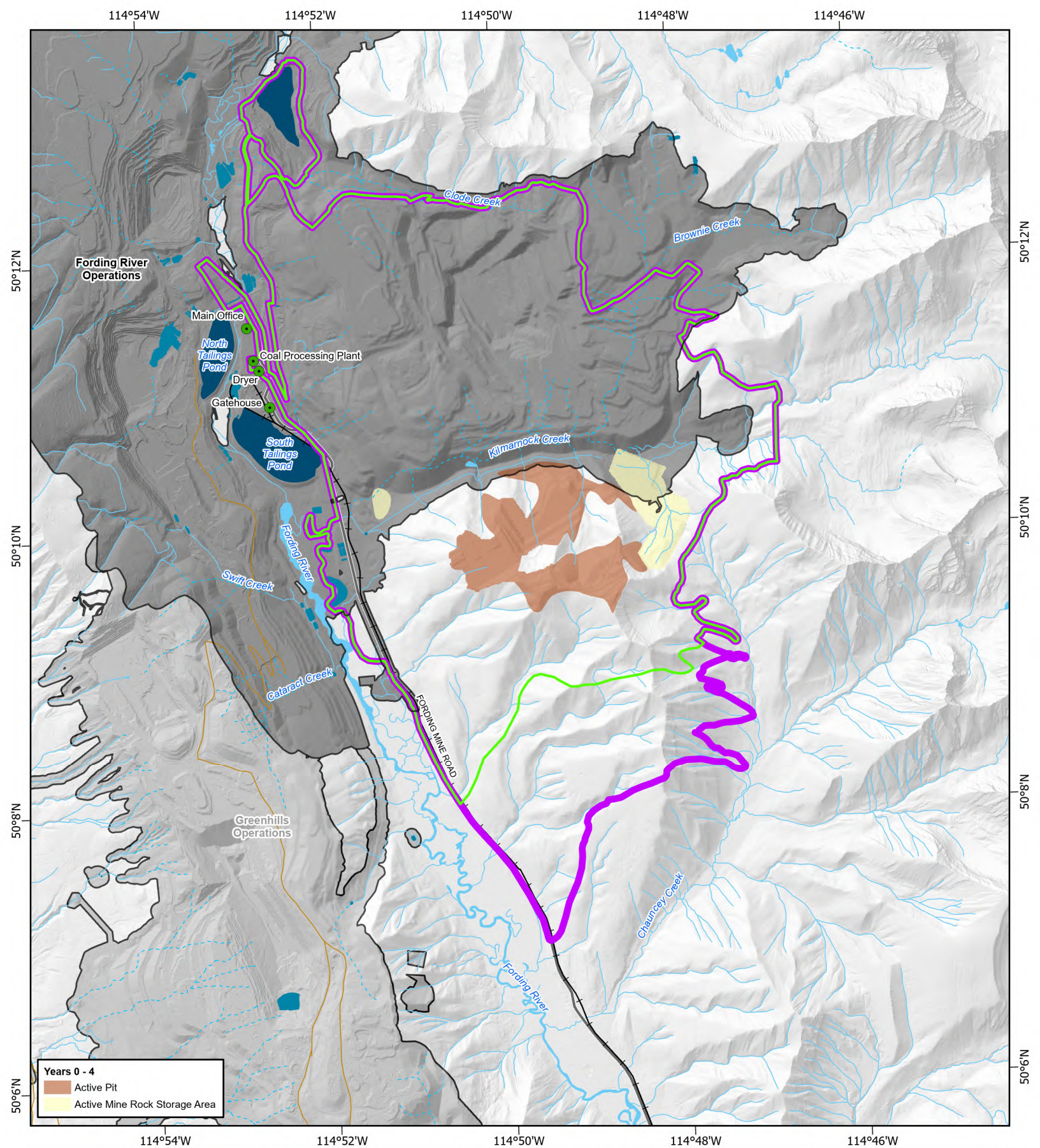
- Existing Facility
- Railway
- Road - Paved
- Road - Unpaved
- Surface Flow Watercourse
- Subsurface Flow Watercourse
- FRO C-3 Permitted Mine Area
- GHO C-137 Permitted Mine Area
- Project Footprint - Stage 1
- Project Footprint - Stage 1 + Stage 2
- Tailings Pond
- Waste Water/Sediment Pond
- Waterbody

N

1 km

DATE: 4/30/2025	MINE OPERATION: FORDING RIVER
SCALE: 1:65,000	COORDINATE SYSTEM: NAD 1983 UTM Zone 11N

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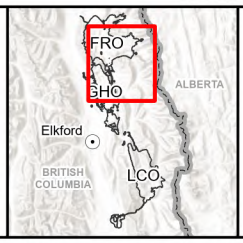


Figure 5.3-2: Representative Mine Sequence - Years 0 to 4 (NTS 082J/02)

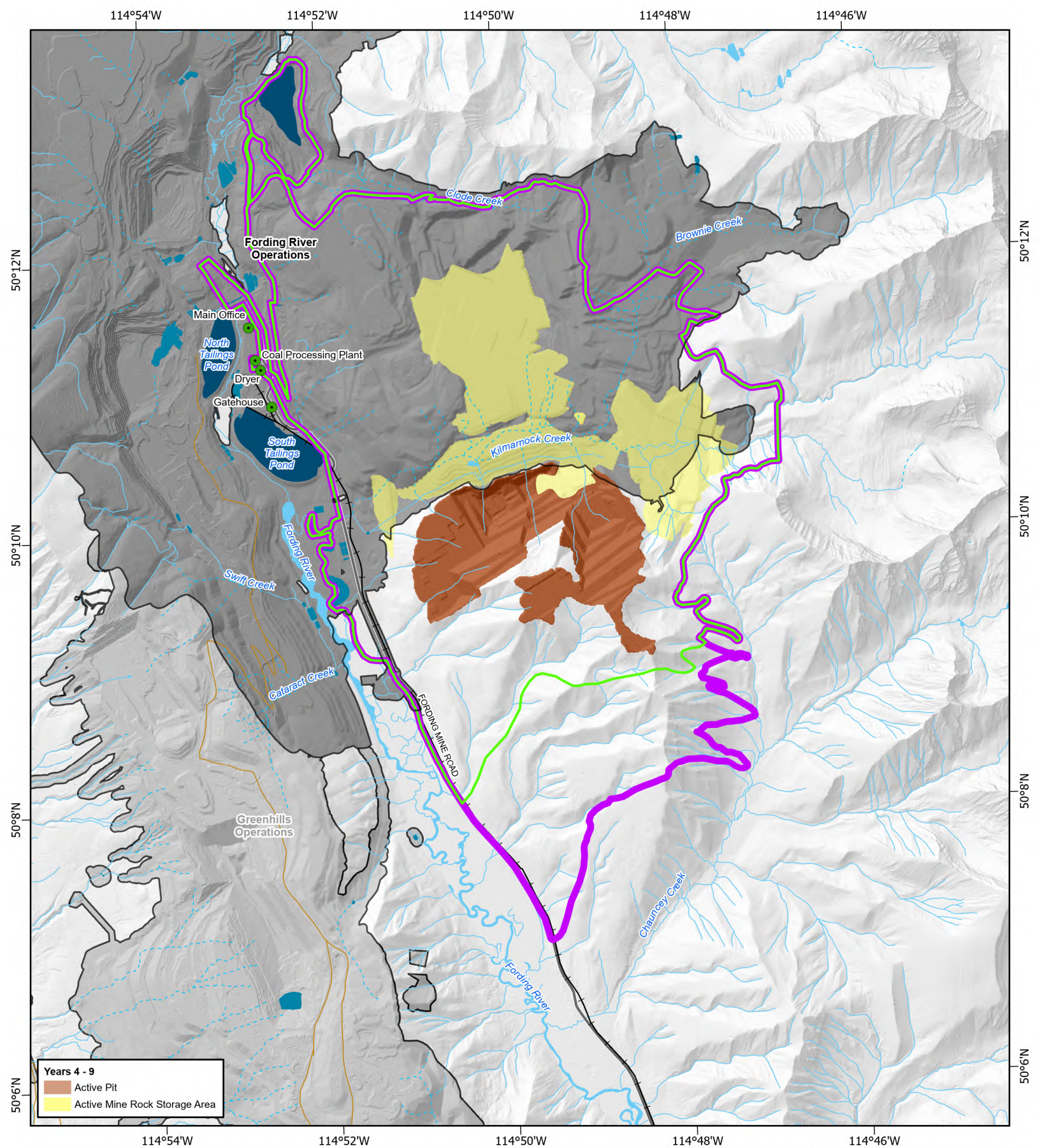
- Existing Facility
- Railway
- Road - Paved
- Road - Unpaved
- Surface Flow Watercourse
- Subsurface Flow Watercourse
- FRO C-3 Permitted Mine Area
- GHO C-137 Permitted Mine Area
- Project Footprint - Stage 1
- Project Footprint - Stage 1 + Stage 2
- Tailings Pond
- Waste Water/Sediment Pond
- Waterbody

N

1 km

DATE: 4/30/2025	MINE OPERATION: FORDING RIVER
SCALE: 1:65,000	COORDINATE SYSTEM: NAD 1983 UTM Zone 11N

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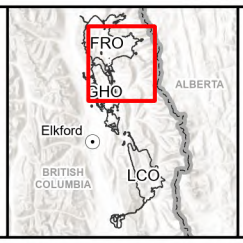


Figure 5.3-3: Representative Mine Sequence - Years 4 to 9 (NTS 082J/02)

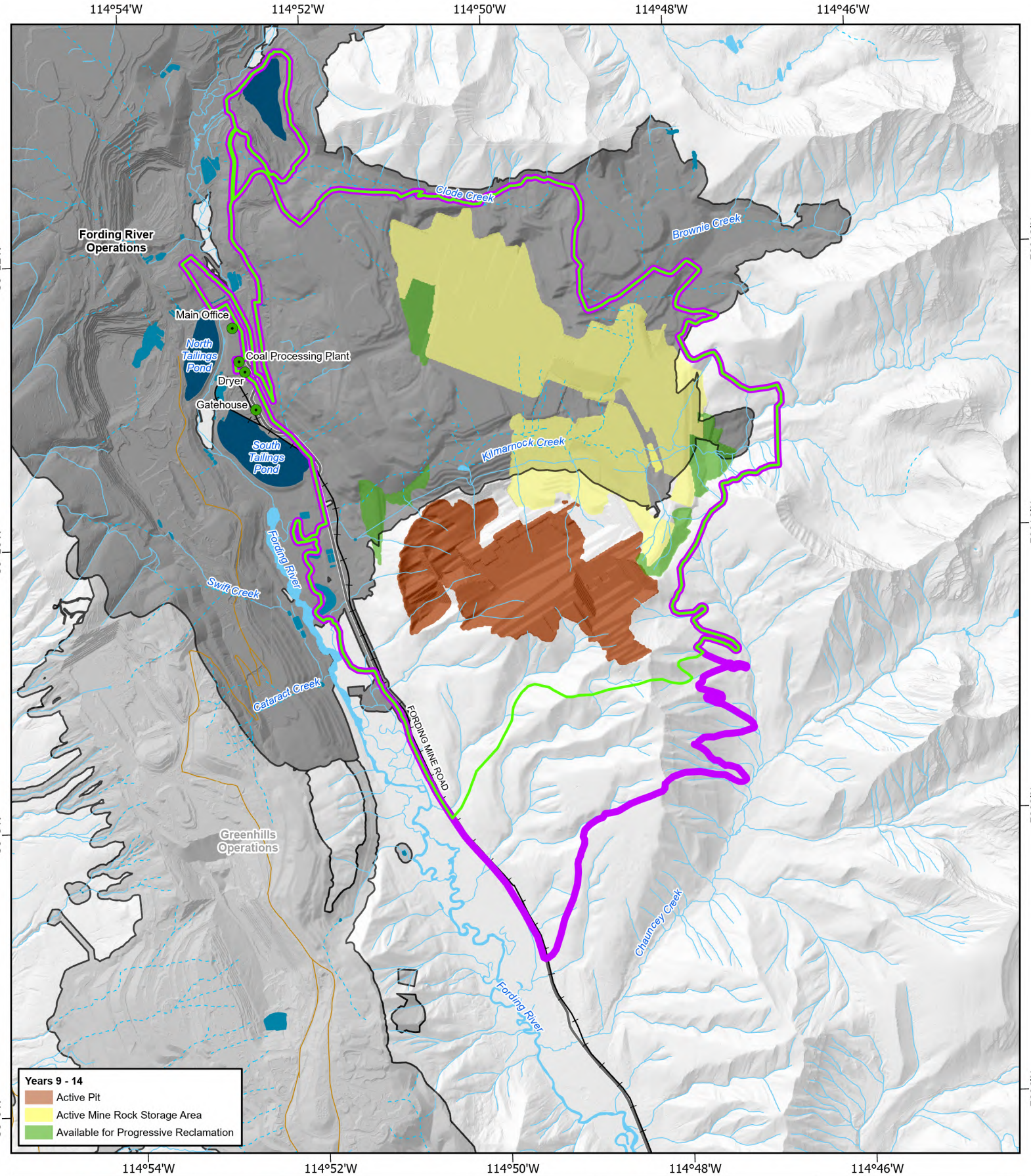
- Existing Facility
- Railway
- Road - Paved
- Road - Unpaved
- Surface Flow Watercourse
- Subsurface Flow Watercourse
- FRO C-3 Permitted Mine Area
- GHO C-137 Permitted Mine Area
- Project Footprint - Stage 1
- Project Footprint - Stage 1 + Stage 2
- Tailings Pond
- Waste Water/Sediment Pond
- Waterbody

N

1 km

DATE: 4/30/2025	MINE OPERATION: FORDING RIVER
SCALE: 1:65,000	COORDINATE SYSTEM: NAD 1983 UTM Zone 11N

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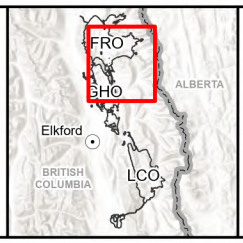


Figure 5.3-4: Representative Mine Sequence - Years 9 to 14 (NTS 082J/02)

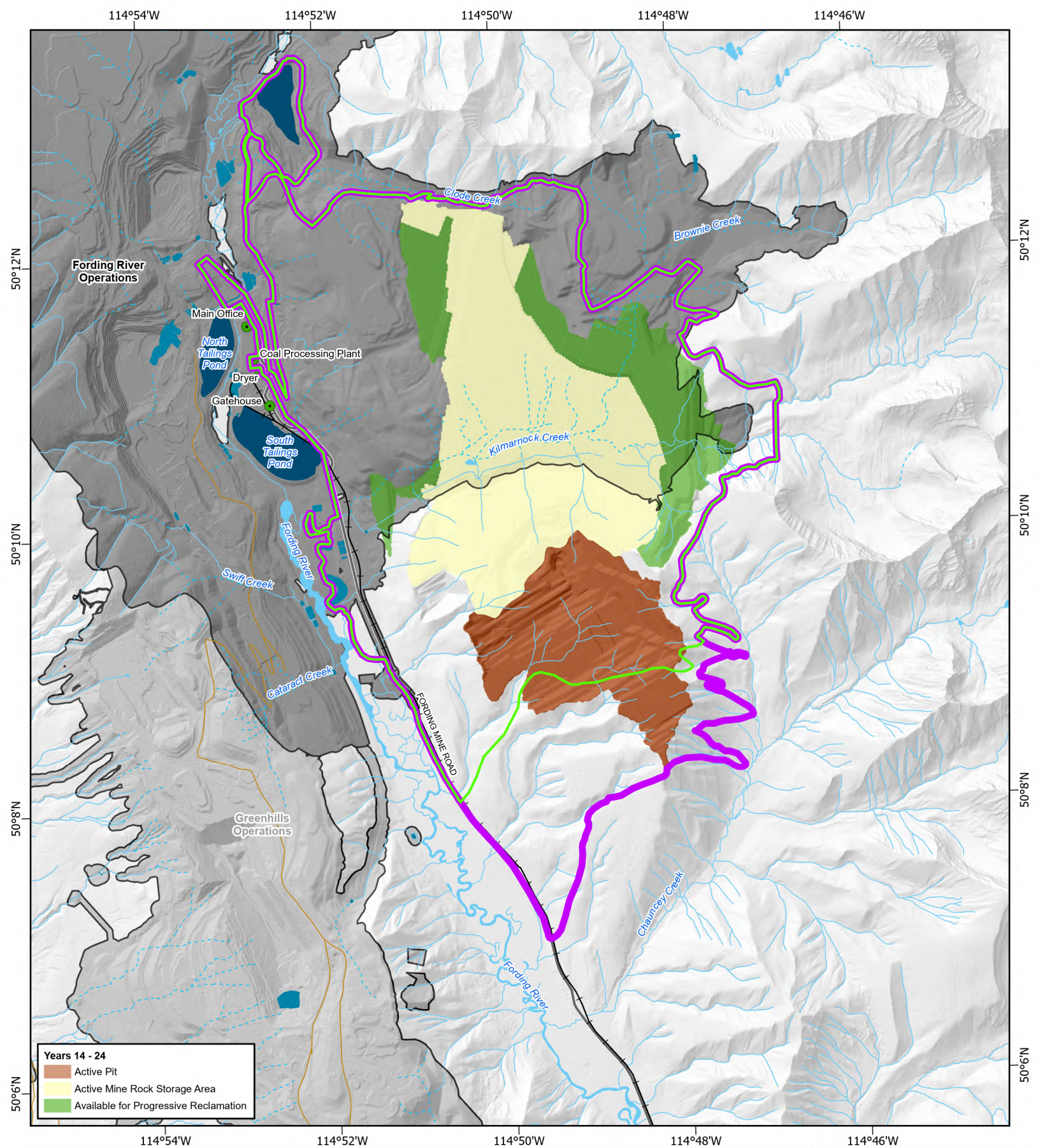
- Existing Facility
- Railway
- Road - Paved
- Road - Unpaved
- Surface Flow Watercourse
- Subsurface Flow Watercourse
- FRO C-3 Permitted Mine Area
- GHO C-137 Permitted Mine Area
- Project Footprint - Stage 1
- Project Footprint - Stage 1 + Stage 2
- Tailings Pond
- Waste Water/Sediment Pond
- Waterbody

N

1 km

DATE: 4/30/2025	MINE OPERATION: FORDING RIVER
SCALE: 1:65,000	COORDINATE SYSTEM: NAD 1983 UTM Zone 11N

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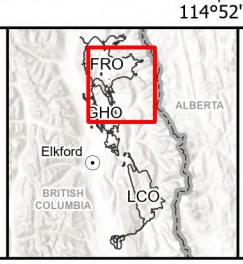


Figure 5.3-5: Representative Mine Sequence - Years 14 - 24 (NTS 082J/02)

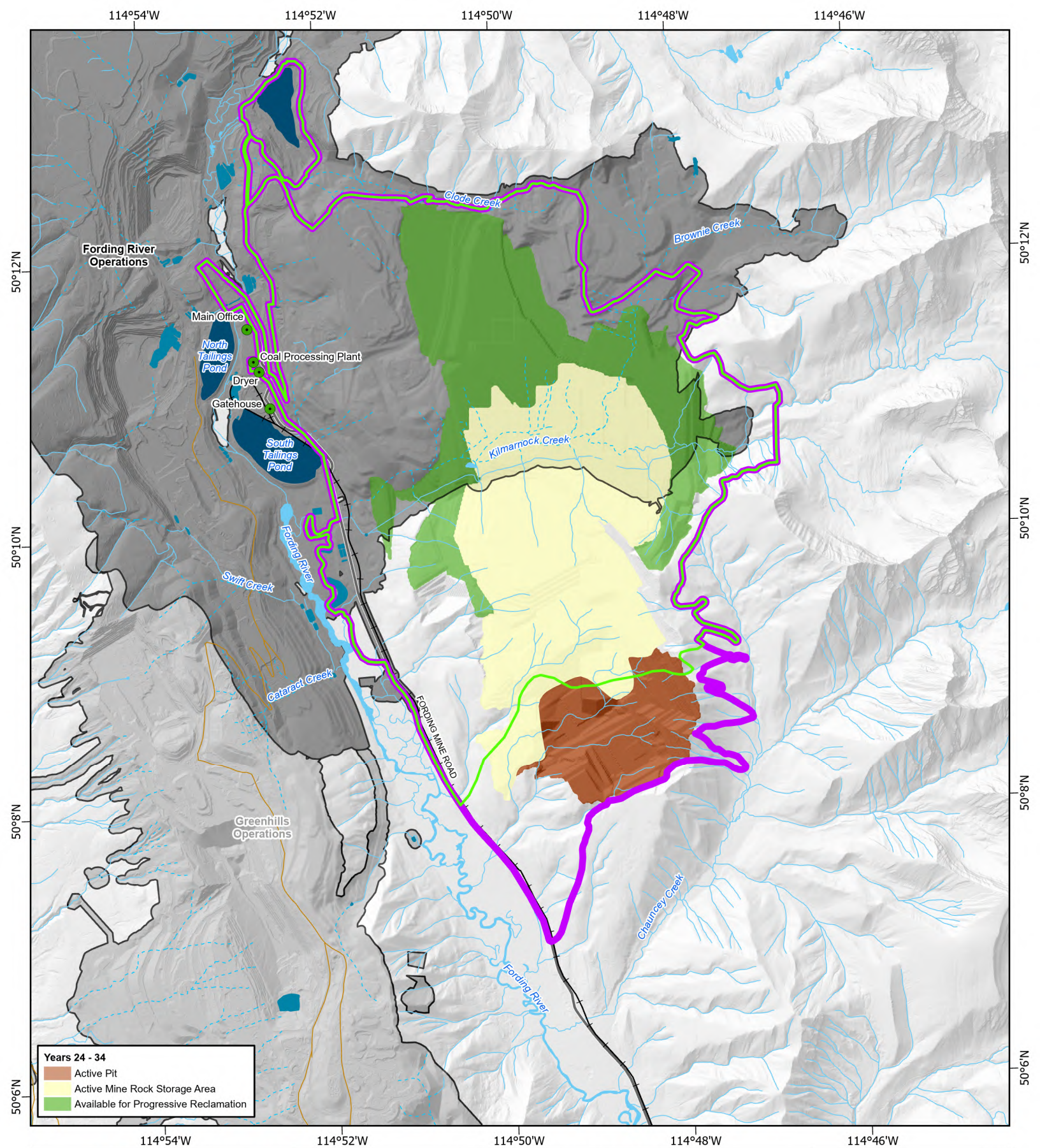
- Existing Facility
- Railway
- Road - Paved
- Road - Unpaved
- Surface Flow Watercourse
- Subsurface Flow Watercourse
- FRO C-3 Permitted Mine Area
- GHO C-137 Permitted Mine Area
- Project Footprint - Stage 1
- Project Footprint - Stage 1 + Stage 2
- Tailings Pond
- Waste Water/Sediment Pond
- Waterbody

N

1 km

DATE: 4/30/2025	MINE OPERATION: FORDING RIVER
SCALE: 1:65,000	COORDINATE SYSTEM: NAD 1983 UTM Zone 11N

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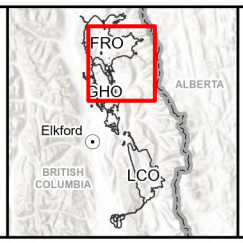


Figure 5.3-6: Representative Mine Sequence - Years 24 - 34 (NTS 082J/02)

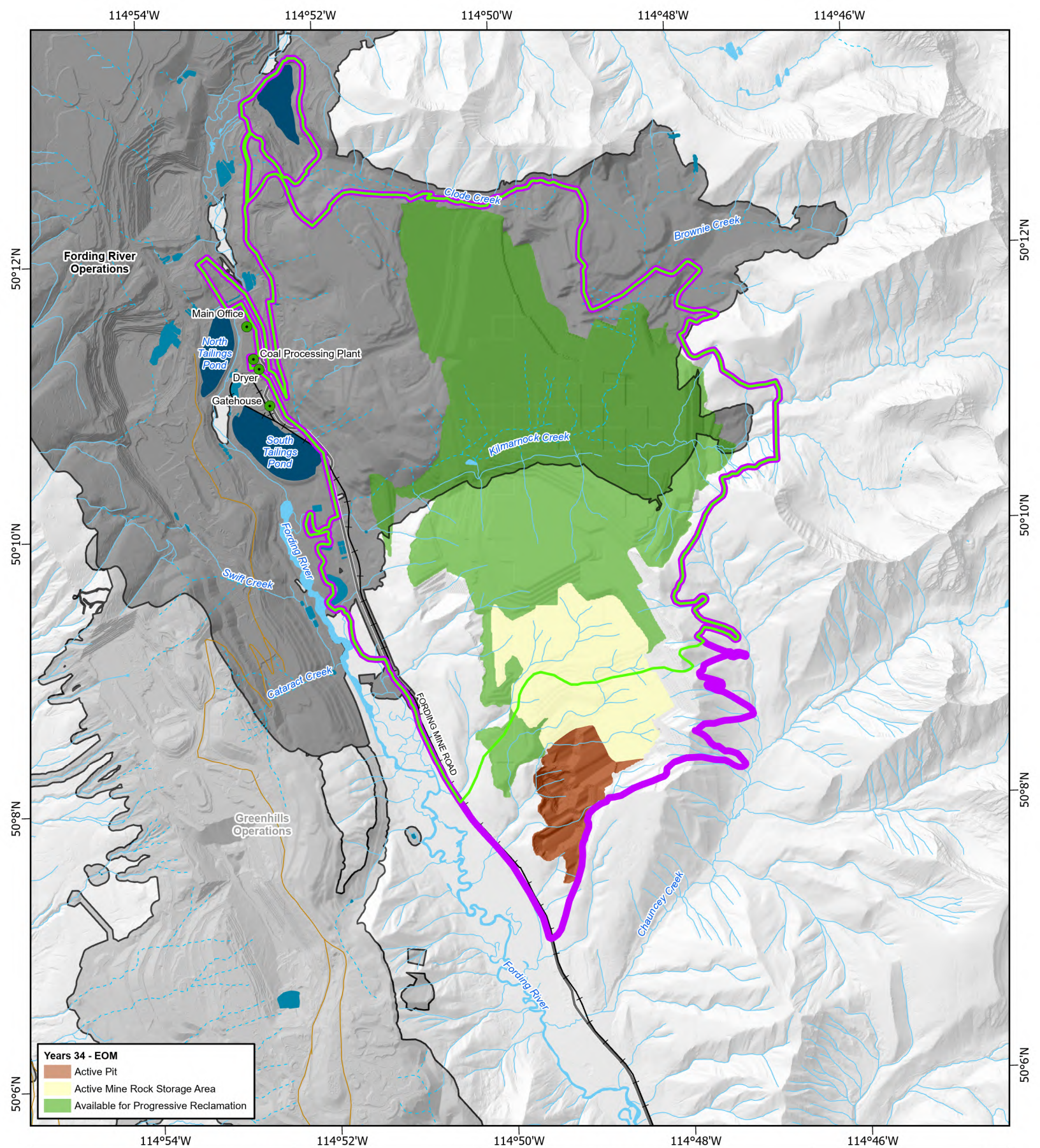
- Existing Facility
- Railway
- Road - Paved
- Road - Unpaved
- Surface Flow Watercourse
- Subsurface Flow Watercourse
- FRO C-3 Permitted Mine Area
- GHO C-137 Permitted Mine Area
- Project Footprint - Stage 1
- Project Footprint - Stage 1 + Stage 2
- Tailings Pond
- Waste Water/Sediment Pond
- Waterbody

1 km

N

DATE: 4/30/2025	MINE OPERATION: FORDING RIVER
SCALE: 1:65,000	COORDINATE SYSTEM: NAD 1983 UTM Zone 11N

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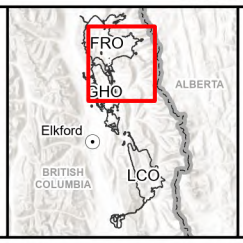


Figure 5.3-7: Representative Mine Sequence - Years 34 to End of Mining (NTS 082J/02)

- Existing Facility
- Railway
- Road - Paved
- Road - Unpaved
- Surface Flow Watercourse
- Subsurface Flow Watercourse
- FRO C-3 Permitted Mine Area
- GHO C-137 Permitted Mine Area
- Project Footprint - Stage 1
- Project Footprint - Stage 1 + Stage 2
- Tailings Pond
- Waste Water/Sediment Pond
- Waterbody

N

1 km

DATE: 4/30/2025	MINE OPERATION: FORDING RIVER
SCALE: 1:65,000	COORDINATE SYSTEM: NAD 1983 UTM Zone 11N

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5.3.3 Development of Mine Rock Storage Areas

The FRX Pit would be developed as a conventional open pit, with progressive backfilling as a key component in the mine plan. A map of the mine rock storage locations is presented in Figure 4.3-1.

In the initial stages of the Project, mine rock storage will be placed in the Kilmarnock Creek drainage, adjacent and south of the current Eagle Pit. After this, mine rock will backfill the Eagle Pit until progressive backfilling opportunities are available within the FRX Pit, as shown in Figure 5.3-1 through Figure 5.3-7. Prioritizing mine rock placement in backfilled pits and previously disturbed areas utilizes existing disturbed areas at FRO and within the Project footprint, reducing disturbance within the upper Kilmarnock drainage and avoiding backfilling in the Chauncey Creek drainage or on the west side adjacent to the Fording River.

Early Engagement Feedback Note

Early engagement on the Project included feedback proposing segregation of mine rock to manage it for constituent release. This is a standard practice at FRO and will be part of the Project. A description of the source of potentially acid generating rock and how it will be managed is provided in this section.

Overall, the Project would place approximately 3.1 Bbcm of mine rock in the mine rock storage areas (Table 5.3-2), with a large portion of the mine rock materials placed in backfilled pits. The remaining mine rock would be placed in the ex-pit Kilmarnock mine rock storage area. Generally, the mine rock is placed to enable macro-scale features to enhance closure planning, progressive reclamation and landscape function.

Table 5.3-2: Project Mine Rock Storage Distribution

Mine Rock Storage Areas	Project Mine Rock Volume (Mbcm)	Percentage of Total Project Mine Rock
Eagle Pit (in-pit)	571	19%
Kilmarnock (ex-pit)		
Existing mine rock disturbance	601	20%
New mine rock disturbance area	480	16%
FRX Pit (in-pit)	1,352	45%

Mbcm = million bank cubic metre; FRX = Fording River Extension.

Mine rock storage areas will be constructed using both bottom-up and top-down techniques. As feasible, and to support progressive reclamation and water quality management objectives, some mine rock storage areas will retain flexibility so that future water quality management techniques could be incorporated, including consideration of research and development findings on water quality source control options (Section 4.4.1).

Mine rock storage areas will be designed to appropriate geotechnical parameters given the stage of the Project. EVR has extensive experience in designing and constructing mine rock storage for the Eagle Pit at the existing FRO, which has similar geology and design features as the FRX Pit. Geotechnical evaluations are ongoing as data are collected and interpreted. Where feasible, final mine rock storage area configurations will be designed to be favourable for reclamation and land use objectives.

Mine rock generated from mining the Project would be geochemically similar to that mined at FRO. While the Morrissey Formation (Section 5.2.1) has been identified as potentially acid generating (PAG), the Morrissey Formation is usually not impacted by mining because it is below the main coal seams.

The current understanding of the likelihood of encountering PAG rock indicates that less than 1% of the Project mine rock might be PAG. There is a reasonable chance that no PAG rock would be encountered. Any rock units that are PAG will be identified in mine plans. Any mining of PAG material will be managed under FRO's approved Metal Leaching and Acid Rock Drainage Management Plan. The geochemistry of the mine rock will continue to be evaluated as part of the ongoing geochemical characterization program being undertaken for the assessment of the Project.

5.3.4 Project Water Management

The water management strategy for the Project includes all aspects of water management to support the phases of mine development from construction through operation, closure and post-closure. Water management planning builds on the regional water quality management plan for EVR's Elk Valley operations laid out in the EVWQP (Teck 2014) and the EVWQP IPA (currently 2022 IPA; Teck 2022b) (Section 9.1.2). Planning also builds on alignment with the objectives of the Mine Water Management Plan at FRO, which includes managing the movement of water to:

Early Engagement Feedback Note

Early engagement on the Project included feedback expressing concerns about potential Project water quality impacts including selenium. This section describes the conceptual water management plan, including what needs to be assessed to fully develop the plan that will be incorporated for the Project.

- support the objectives of the EVWQP and IPA
- mitigate impact to the receiving environment and meet regulator and permit compliance
- support geotechnical, water quality and water quantity considerations
- maximize the availability of water resources at the operations and for downstream water use
- support safe and sustainable mining

Water management strategies for the Project also align with the BC Policy for Mitigating Impacts on Environmental Values and EVR's hierarchy of controls, which, in the order of preference, is to prevent, reduce and treat. This framework will be adapted to the unique circumstances of the Project and will evolve over time based on new information.

Water at mining operations can be generally classified into three types:

- Water that contacts areas of mining (pits, mine rock) is called mine-influenced contact water.
- Water that contacts disturbances (e.g., tree clearing and soil salvage) but not mining areas is called sediment-influenced contact water.
- Water that is kept from contacting mining activities is called non-contact water.

One water management strategy is to prevent the interaction of non-contact water with the active mining areas (pits, mine rock storage areas, TSFs and access roads) through construction of diversions, pipelines or similar facilities, and to safely reduce or minimize interaction of non-contact water with mining activities. The Project will

necessitate refinements to the current Kilmarnock Clean Water Diversion, with these refinements to be evaluated as part of the assessment of the Project and addressed in the Project's water management plan.

Surface water impacted by mining operations will be conveyed to sediment ponds or other treatment facilities through a system of ditches, channels, drains, head ponds or sumps, or pumping/piping systems prior to discharge to the receiving environment. The water management strategies are shown schematically in Figure 5.3-8 through Figure 5.3-11 and described below.

During Project construction, the FRO Coal Processing Plant and existing mine pits would continue to operate as normal with the addition of Project sediment-influenced contact water discharges and a water reservoir/in-pit storage in the north half of the Project to support use of mine-influenced water, reducing draws from other sources. These additional discharges would be from early disturbance activities, such as soil salvage. Water management infrastructure would capture water discharged from cleared areas and treat it for total suspended solids.

The location of water management infrastructure proposed during Project construction is shown in Figure 5.3-8 but may be refined in response to assessment findings. Construction activities will mainly begin at the north part of the Project mine area. At this stage, sediment-influenced contact water discharges would be intercepted and re-directed to the existing and proposed infrastructure, with appropriate modifications as needed. The construction of the interception facilities (i.e., channels, ditches, head ponds and sumps) will be staged to match mine development (Figure 5.3-9 to Figure 5.3-11).

Project sediment-influenced contact water will discharge primarily on the west of the Project mine area to be intercepted and re-directed to sediment pond systems on the north and south sides of the mine area. The south discharge location will be required for water draining from the south portion of the mine area, to be developed as part of Stage 2, and where it may not be feasible to direct the water north (uphill) to the existing discharge location. The construction of the interception channel and/or sediment ponds will also be staged to match mine development. The specific location of the sediment pond system and outlet is being assessed; however, the area for possible locations of the southern sediment pond system is shown in Figure 5.3-10 and Figure 5.3-11.

Discharges of mine-influenced contact water from the FRX Pit and the mine rock storage areas are being assessed. Some pit water management will include managing water from direct precipitation in the pit, runoff from upslope catchments and groundwater inflow. Strategies to be implemented as part of the water management plan to be further refined through assessment and permitting for the Project may include:

1) interception of subsurface flows above the pit floor through interceptor ditches, sumps and/or high wall dewatering systems
2) collection and temporary storage within the pit floor
3) collection and conveyance of water to sediment ponds and/or other treatment facilities

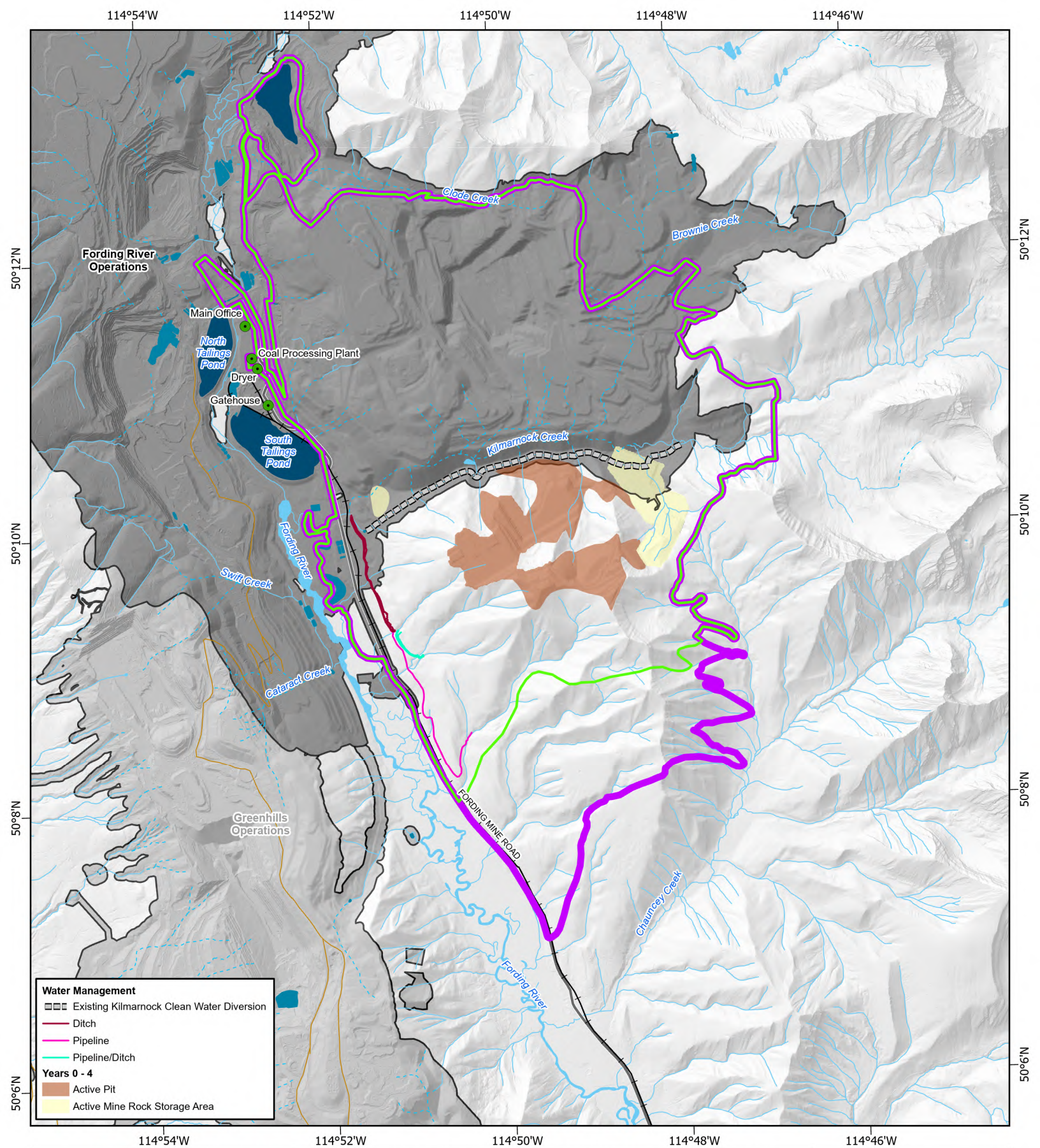
In-pit pumping may include a series of small sumps to reduce coarse sediment loading in the discharge from the pit and pumping out of the pit will be directed to adjacent mine rock storage areas for ultimate conveyance to water management infrastructure prior to discharge to the receiving environment. In-pit source control measures will also be implemented to address management of nitrate (Section 4.4).

Mine-influenced contact water from the mine rock storage areas would drain to the Kilmarnock drainage, the Clode drainage or into the FRX Pit. Water quality management options for the mine-influenced contact water are described in Section 4.4. All water discharges are designed to meet discharge criteria.

Specifically, the water quality mitigation approach for the Project is to integrate mine planning and mine water management early to help avoid or reduce impacts to water quality. The approach focuses on selecting mitigations based on the best achievable technology (BC MECCS 2021) and consideration of measures that are intended to reduce reliance on water treatment over time, including source control (Section 4.4.1). As part of this approach, the water management plan will first consider known water treatment technologies, such as SRFs (Section 4.4.2), to build on the learnings and experience gained in the Elk Valley to date. The Project mine plan has incorporated two areas within the FRX Pit where SRFs could be implemented. As planning continues, more detailed evaluation and iteration of the water management plan will occur through the assessment of the Project. The assessment will evaluate the Project's impact on regional water quality with the help of a numerical hydrology and water quality model. To represent regional water quality in the most realistic way achievable, the most updated version of the Regional Water Quality Model (2023 RWQM) will be used for the Project, and learnings from recent groundwater studies in the proximity of the Project will be considered. Existing seasonal flow variability of the Fording River watershed, potential effects of climate change and instream flow requirements set for the upper Fording River[16] will also be considered. Based on the water quality projections, the potential water management options (Section 4.4) to reduce impacts to water quality will be further explored and assessed for implementation as part of water management.

Water management details for the Project tailings strategy (Section 4.5.2) continue to be developed and will be provided in the IS/A.

[16] Instream flow requirements are in the process of being finalized for the upper Fording River. This process is being led by the Ministry of Water, Land and Resource Stewardship.



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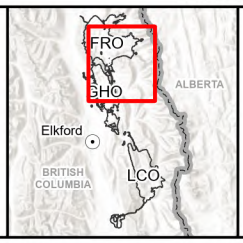


Figure 5.3-8: Representative Water Management Snapshot - Year 4 (NTS 082J/02)

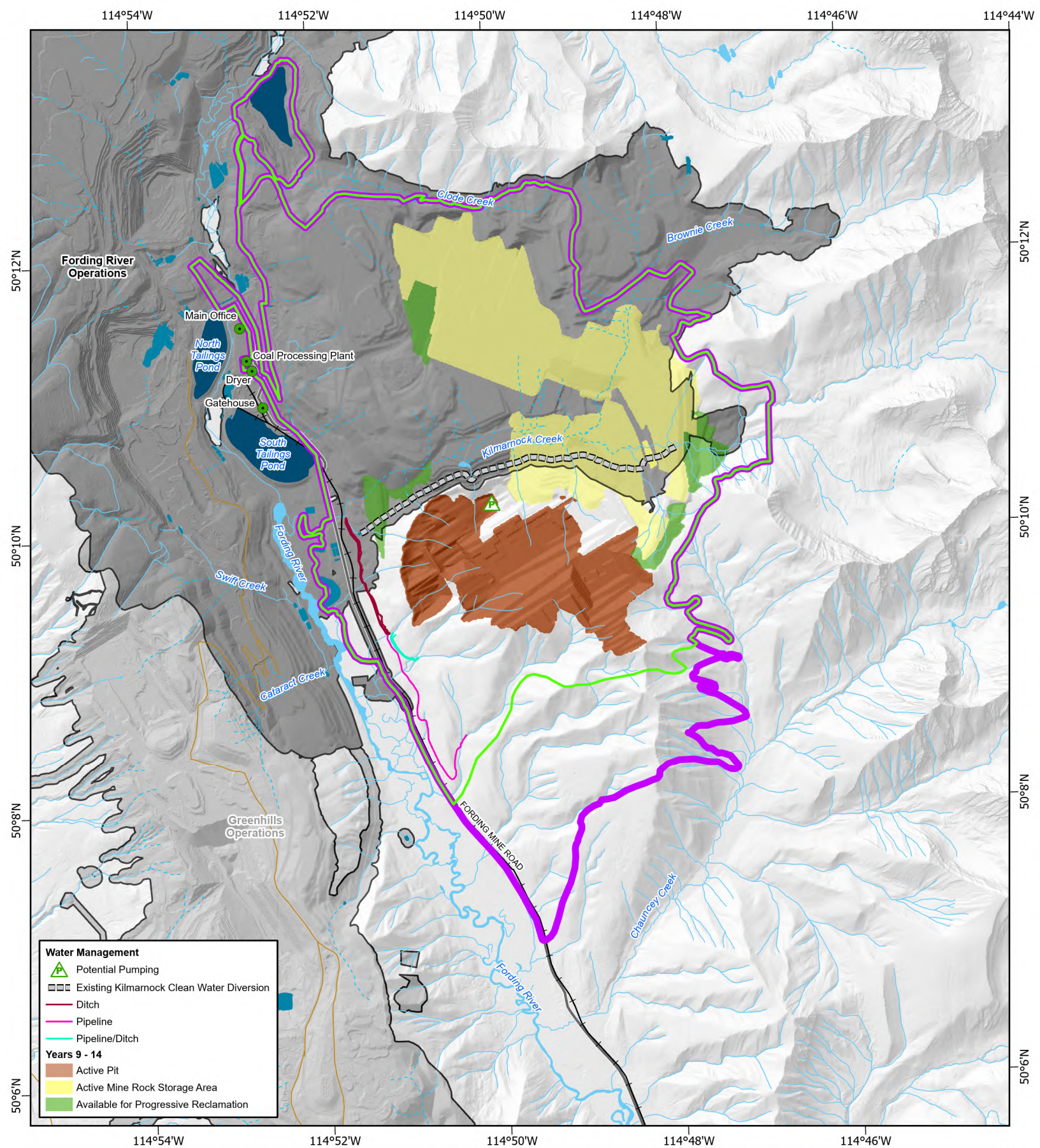
- Existing Facility
- Railway
- Road - Paved
- Road - Unpaved
- Surface Flow Watercourse
- Subsurface Flow Watercourse
- FRO C-3 Permitted Mine Area
- GHO C-137 Permitted Mine Area
- Project Footprint - Stage 1
- Project Footprint - Stage 1 + Stage 2
- Tailings Pond
- Waste Water/Sediment Pond
- Waterbody

N

1 km

DATE: 4/30/2025	MINE OPERATION: FORDING RIVER
SCALE: 1:65,000	COORDINATE SYSTEM: NAD 1983 UTM Zone 11N

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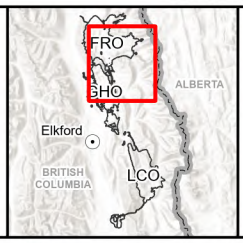


Figure 5.3-9: Representative Water Management Snapshot - Year 14 (NTS 082J/02)

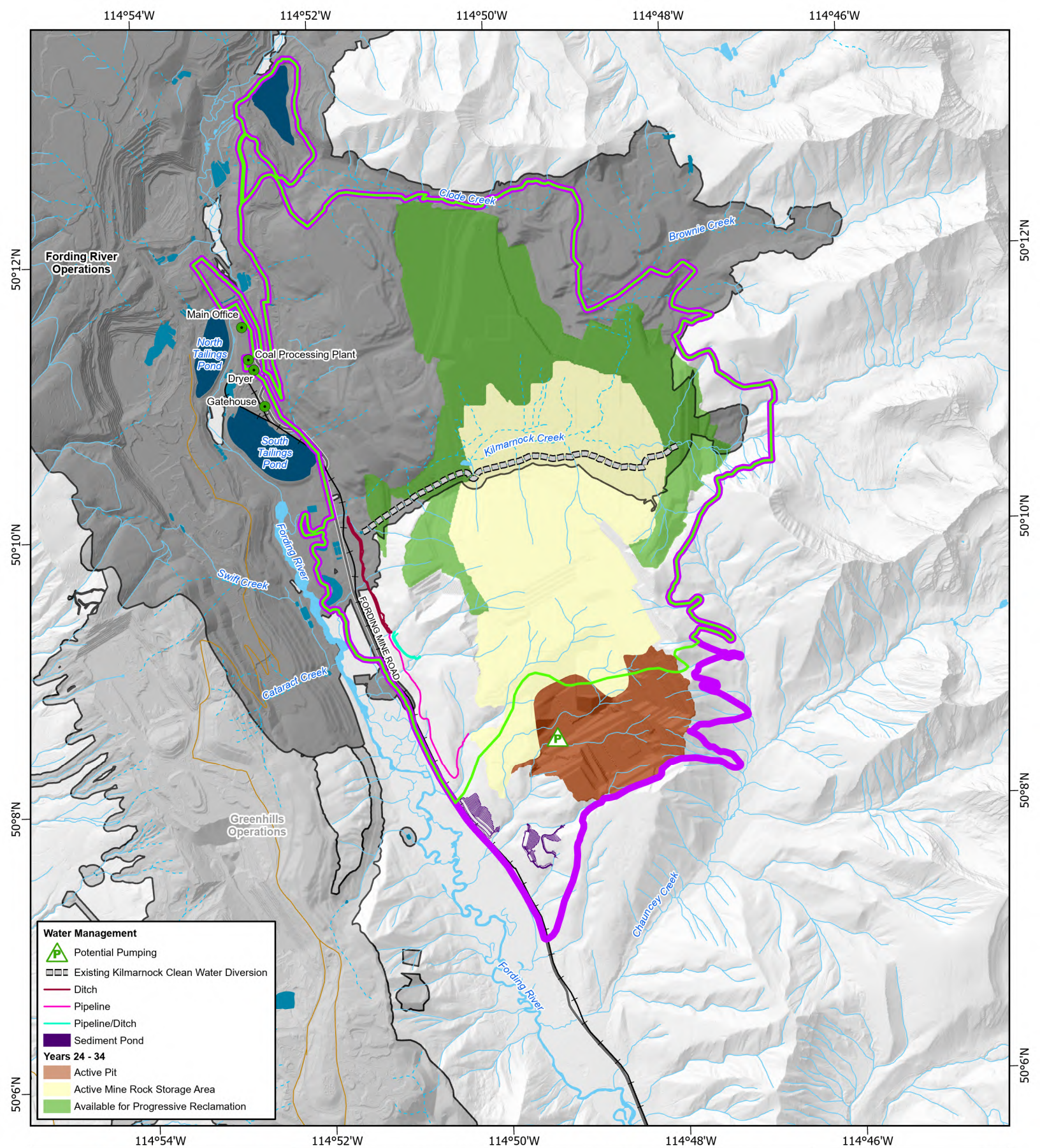
- Existing Facility
- Railway
- Road - Paved
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- Surface Flow Watercourse
- Subsurface Flow Watercourse
- FRO C-3 Permitted Mine Area
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- Project Footprint - Stage 1
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- Waterbody

N

1 km

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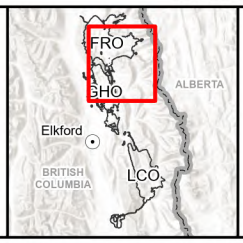


Figure 5.3-10: Representative Water Management Snapshot - Year 34 (NTS 082J/02)

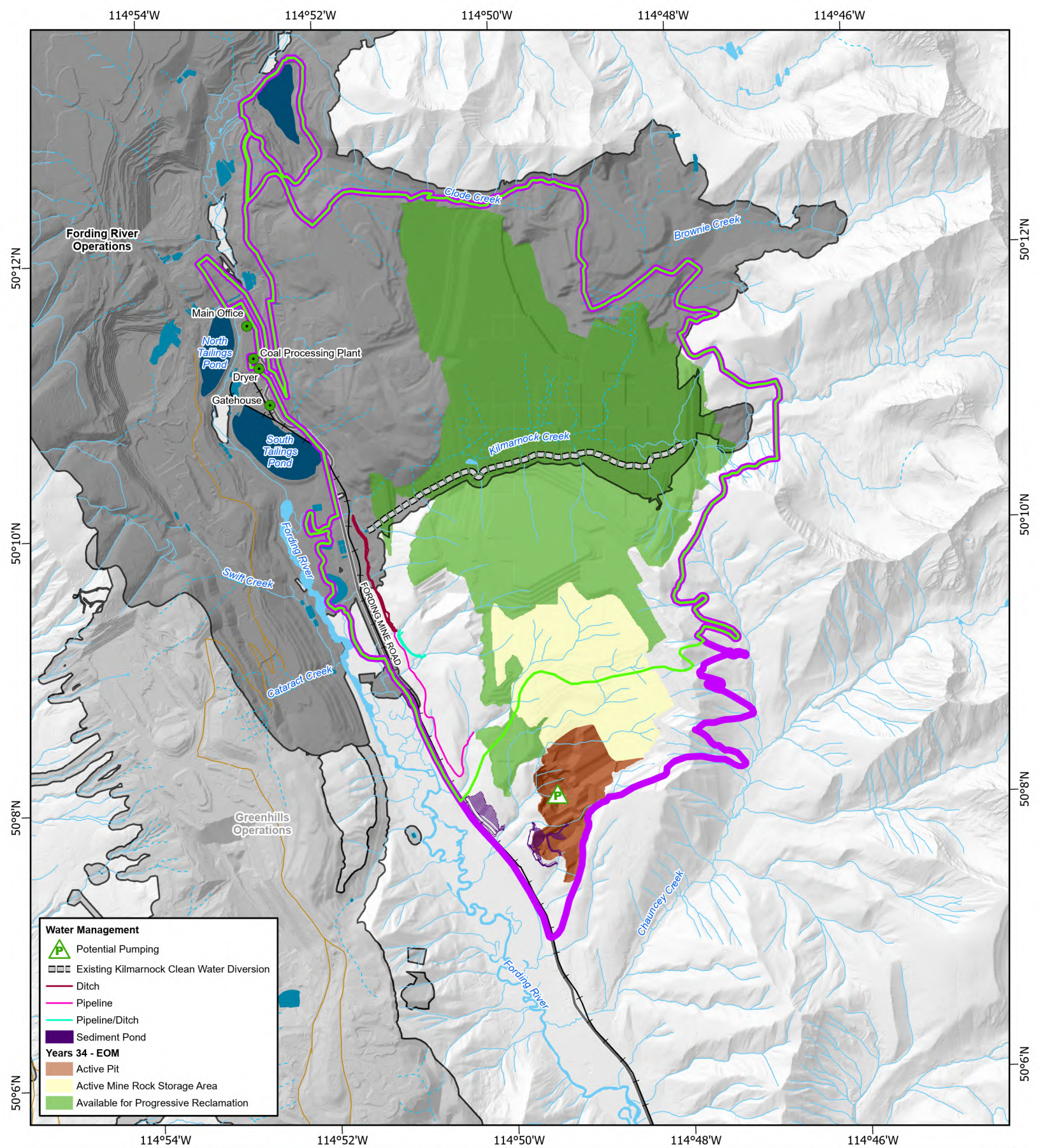
- Existing Facility
- Railway
- Road - Paved
- Road - Unpaved
- Surface Flow Watercourse
- Subsurface Flow Watercourse
- FRO C-3 Permitted Mine Area
- GHO C-137 Permitted Mine Area
- Project Footprint - Stage 1
- Project Footprint - Stage 1 + Stage 2
- Tailings Pond
- Waste Water/Sediment Pond
- Waterbody

N

1 km

DATE: 4/30/2025	MINE OPERATION: FORDING RIVER
SCALE: 1:65,000	COORDINATE SYSTEM: NAD 1983 UTM Zone 11N

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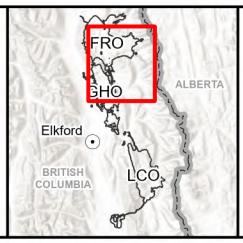


Figure 5.3-11: Representative Water Management Snapshot - End of Mining (NTS 082J/02)

- Existing Facility
- Railway
- Road - Paved
- Road - Unpaved
- Surface Flow Watercourse
- Subsurface Flow Watercourse
- FRO C-3 Permitted Mine Area
- GHO C-137 Permitted Mine Area
- Project Footprint - Stage 1
- Project Footprint - Stage 1 + Stage 2
- Tailings Pond
- Waste Water/Sediment Pond
- Waterbody

1 km

N

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5.3.5 Landform Design

During the FRX closure plan's initial development, opportunities were actively sought to explore innovative approaches for optimizing reclamation efforts. One key focus was on integrating mining landform design to support diverse ecosystem development by providing a suitable variety of elevations, slopes and aspects to facilitate a diversity of landscapes that, combined with sufficient soil and cover material, could sustain a variety of plant and animal life, contributing to improved biodiversity outcomes, land use and visual quality.

To achieve these outcomes, EVR collaborated with subject matter experts who provided valuable insights and expertise based on industry learnings and best practices. This initial work will be reviewed and discussed with the KNC, Yaq̓it ʔa·knuqƛi ʼit, and other participating Indigenous nations to identify additional landform design improvements. EVR compiled six unique reclamation alternatives, each offering a different approach to shaping and restoring the landscape. By designing meaningful landforms and using additional groundcover to re-establish wetter ecosystems like mesic forests, balancing a potential surplus of dry forests and focusing on grassland and brushland ecosystems, EVR can reduce the residual impacts of the Project through reclamation and limit the extent to which the final step of the mitigation hierarchy (i.e., offsetting) is needed. The goal of reclamation and closure is to establish sustainable, diverse and functional watercourses and landscapes establishing an ecological trajectory toward natural conditions. Integral to successful reclamation is the incorporation of Indigenous knowledge and values during reclamation planning, implementation and monitoring. Further information on mine reclamation and closure can be found in Section 5.6.

5.4 Waste and Emissions

5.4.1 Project Waste

Project waste would be the same as FRO's wastes and no new types of waste would be produced. Waste will be managed following existing FRO waste management processes. Where needed, the existing plans and processes would be updated to incorporate the Project.

Key types of waste associated with the Project would include:

- tailings from the processing of raw coal
- hazardous and non-hazardous waste (e.g., office/domestic waste and vehicle maintenance wastes)
- sewage
- contaminated soil (in the event of spills or leaks)

Note that mine rock removed to uncover mine coal resources are not considered waste and are discussed in Section 5.3.3.

Raw coal from the Project would be processed at the FRO Coal Processing Plant. As described in Section 4.51.1, waste generated during coal processing at FRO currently includes combined coarse and fine rejects and fine tailings. Combined coarse and fine rejects consists of sand- to gravel-sized particles with minor amounts of coal and fines and is stored at the Eagle 4 South CCFR storage facility. Fine tailings consist of sand- and silt-sized particles, fine coal, water and trace quantities of coal processing chemicals. From the FRO Coal Processing Plant, the fine tailings are discharged to the STP; after settling, the materials are dredged and pumped to the Turnbull TSF.

As described in Section 4.5.2, the Project may first utilize FRO's current practice and then may transition to a combination of the selected tailings management alternatives (including combination of thickened tailings, dewatered tailings and fine coal recovery). Dewatered tailings may be stored at an expanded CCFR storage facility and/or to a new facility to provide sufficient capacity for the storage of coarse coal rejects and the dewatered fine tailings (combined as CCFR) for the life of the Project. The need for a dam raise at the existing Turnbull TSF to support the Project will be evaluated as part of developing the Project's tailings management strategy. This process will be done acknowledging that FRO may address increasing the capacity of the TSF in a sperate permitting process to support existing operations. The timing for the transition from FRO's current tailings management practice to a new Project-specific tailings management plan is being evaluated and will be identified in the IS/A.

Project-related non-hazardous wastes would be managed through the existing FRO waste management and recycling program. Liquid wastes generated due to the Project would be collected and either re-used within the mining process or disposed of at an appropriate on- or off-site facility. On-site landfill cells could be incorporated into existing or future mine rock storage areas, however EVR continues the recycling program and is evaluating supplemental options to no longer put garbage within mine rock storage areas, including haul truck tires. This would require an amendment of Waste Discharge Permit – Refuse AMS7726 (Section 6.4). EVR continues to evaluate ways to reduce waste and recycle and implement best practices for non-recyclables and will incorporate them into the Project, where feasible. Sewage would be collected and disposed of in the permitted FRO sewage treatment facility. Sewage is expected to be produced by the Project at the same rate as currently produced.

5.4.2 Greenhouse Gases

The Project would meet appropriate emissions and GHG regulations and requirements and align with EVR's goal to achieve net zero across all operations and activities by 2050. This section describes GHG emissions at the existing FRO and provides conservative estimates on potential Project GHG emissions without additional mitigations. The Project GHG emissions, including potential additional mitigations, will be evaluated through the IS/A considering the Strategic Assessment of Climate Change (Government of Canada 2020) and the proposed BC Net-Zero New Industry Policy as described in the Net-Zero New Industry Intentions Paper (Government of British Columbia 2023).

Early Engagement Feedback Note

Early engagement on the Project included feedback expressing concerns about potential Project greenhouse gas emissions. This section describes the Project plan to assess a conservative case based on proven technology while committing to adopting new technologies as they become proven and practicable.

The primary sources of GHG emissions for the Project would be like those at the existing FRO, which include:

- combustion of diesel, natural gas and other fossil fuels to power mobile equipment and vehicles, to provide heating, for the coal drying process and for other uses
- methane, which is a GHG and is often trapped in coal and is released during mining (also referred to as fugitive methane)
- use of electricity acquired from the grid

Additionally, Project construction will involve the conversion of land within the Project footprint from forest and wetland land use types to an operational mine, resulting in GHG emissions.

Recent GHG emissions at FRO are shown in Table 5.4-1. The GHG emissions were calculated according to federal GHG reporting requirements. It is important to note that these GHG emission values are not consistent with the values reported to the annual federal GHG Reporting Program, available through ECCC's Single Window Information Manager, as they have been refined to include updated emission factors and global warming potential values to be consistent with inputs used to estimate the GHG emissions of the Project. The refined values include an updated fugitive methane emission factor based on the latest version of the National Inventory Report (ECCC 2024) and an updated global warming potential of methane and nitrous oxide with the adoption of values from the fifth assessment report of the Intergovernmental Panel on Climate Change by Environment Canada in 2022 (Government of Canada 2022).

Direct GHG emissions account for nearly all the total reported GHG emissions at FRO, where approximately 85% to 90% of the direct emissions originated from diesel combustion for mobile equipment and estimated fugitive methane. The increasing trend in direct emissions in Table 5.4-1 is attributable to operational factors including haul distances and the amounts of mine rock moved and coal produced. Indirect GHG emissions from acquired electricity is a minor contributor to the total reported GHG emissions at FRO.

For context, total GHG emissions in 2023 for BC were 56 million tonnes of carbon dioxide equivalent per year (t CO_2e/yr) (BC MECCS 2024a) and those for Canada were 694 million t CO_2e/yr (ECCC 2024). Total GHG emissions for FRO (direct and indirect) in 2023 from Table 5.4-1 were 828,329 t CO_2e/yr, corresponding to 1.5% of BC's emissions and 0.12% of Canada's emissions.

Table 5.4-1: Historical Greenhouse Gas Emissions at Fording River Operations

Greenhouse Gas Emissions (t CO_2e/yr)							
Emission	**2023**	**2022**	**2021**	**2020**	**2019**	**2018**	**2017**
Direct GHG Emissions Including:	**826,140**	**807,929**	**822,922**	**707,347**	**759,632**	**735,219**	**671,458**
Mobile equipment and vehicles	*394,710*	*387,612*	*380,880*	*317,808*	*315,377*	*277,179*	*236,174*
Fugitive methane	*332,559*	*318,204*	*330,621*	*291,080*	*337,598*	*346,053*	*327,095*
Other fuel combustion sources, including heating, coal drying process and other uses	*98,871*	*102,113*	*111,420*	*98,459*	*106,657*	*111,987*	*108,189*
Indirect Emissions Including acquired electricity	**2,188**	**2,079**	**1,620**	**6,210**	**4,944**	**4,223**	**5,138**
Total Emissions	**828,329**	**810,008**	**824,542**	**713,557**	**764,576**	**739,442**	**676,596**

t CO_2e/yr = tonnes carbon dioxide equivalent per year; GHG = greenhouse gas

Estimated maximum annual GHG emissions by phase of the Project are presented in Table 5.4-2. During the Stage 1 Construction Phase, FRO would continue to operate in parallel with Project construction emissions. These additional Project emissions will be from the combustion of fossil fuels in construction equipment and land use change. Clean coal production from the Project will increase as construction progresses, adding Operational Phase emission sources such as coal drying, fugitive methane, buildings and heating, and ore

hauling by the mobile fleet to sources associated with the construction activities. As a result, emission estimates for the Stage 1 Construction Phase do not solely represent emissions from construction activities. Maximum net annual emissions during this phase of the Project are estimated at 750,494 t CO_2e/yr, 372,771 t CO_2e/yr of which are related to land use change. During the two-year Stage 1 Construction Phase as a whole, land use change emissions represent 55% of total direct emissions.

Table 5.4-2: Estimated Maximum Annual Project Greenhouse Gas Emissions by Project Phase

Phase	Maximum Annual Emissions t CO_2e/yr					
	Direct GHG Emissions	Acquired Energy GHG Emissions	CO_2 Captured and Stored	Avoided Domestic Emissions	Offset Credits	Net GHG Emissions
Stage 1 Construction Phase	750,385	109	0	0	0	750,494
Operations Phase – Stage 1 Only (Years 3 to 17)	847,980	206	0	0	0	848,185
Operations Phase – Stage 1 + Stage 2 Overlap (Years 18 to 25)	928,662	190	0	0	0	928,852
Operations Phase – Stage 2 Only (Years 26 to end of mining)	913,939	199	0	0	0	914,138
Closure Phase	37,493	0	0	0	0	37,493
Post-Closure Phase	3,352	0	0	0	0	3,352

GHG emission reduction opportunities not represented in the table above.t CO_2e = tonnes of carbon dioxide equivalent; CO_2 = carbon dioxide; GHG = greenhouse gas

During the Operations Phases, GHG emissions are expected to trend as follows:

- Direct emissions from diesel combustion to power mobile equipment (primarily haul trucks used to move coal and mine rock) would continue to vary from year to year as different areas of the Project are mined, depending on factors including haul distances, strip ratio (i.e., the ratio of the volume of mine rock moved relative to the tonnage of clean coal produced) and terrain.
- Direct emissions associated with fugitive methane are estimated from the amount of raw coal extracted from the mine and processed. As the Project would maintain current production levels with some interannual variation, fugitive methane emissions are expected to generally fluctuate within 30% of current levels.
- Other direct emissions are relatively small and are also expected to remain at current levels. These include emissions associated with the existing FRO Coal Processing Plant and support facilities, which would continue to operate at current production levels.
- Acquired energy GHG emissions associated with electricity acquired from the grid would remain at approximately current levels with some increase for the dewatered tailings option (Section 4.5.2). However, the increase would be small due to the renewable power infrastructure that feeds the BC grid (97% sourced from renewable energy) (ECCC 2023a). Estimated emissions for acquired energy in Table 5.4-2 are lower than reported historical emissions (Table 5.4-1) because they were calculated using the 2030 electrical grid emission intensity for BC from the Draft Technical Guide to the Strategic Assessment of Climate Change (Government of Canada 2021), whereas historical emissions were calculated using other available emission intensities for the BC electrical grid.

Estimated Project GHG emissions for the Stage 1 only Operations Phase show maximum net annual emissions of 848,185 t CO_2e/yr (in Year 16), of which the greatest contributing sources are fugitive methane emissions (383,373 t CO_2e/yr) and mobile diesel equipment associated with coal and mine rock hauling (348,664 t CO_2e/yr). Maximum net annual emissions for Stage 2 only Operations Phase are estimated at 914,138 t CO_2e/yr (in Year 28), of which the greatest contributing sources are fugitive methane emissions (419,232 t CO_2e/yr) and mobile diesel equipment (371,068 t CO_2e/yr). For the period where Stage 1 and Stage 2 overlap, the maximum net annual emissions are estimated at 928,852 t CO_2e/yr (in Year 23). Similarly, the greatest contributing sources are the fugitive methane emissions (395,922 t CO_2e/yr) and mobile diesel equipment (280,363 t CO_2e/yr); however, in Year 23, there is also additional GHG emissions from land use change (133,703 t CO_2e/yr) as a result of planned land clearing activities for Stage 2.

Greenhouse gas emissions for Project closure activities are also presented in Table 5.4-2. The majority of emissions from closure activities are projected to occur during the Closure and Post-Closure phases. However, a notable proportion of emissions are expected during the Operations Phases from ongoing closure activities as the mine progresses southward and older sections of the pit are decommissioned. These emissions are associated with the operation of mobile equipment used for contouring, fertilizing, seeding, soil remediation and sampling, and they are expected to be less than the emissions estimated for the mobile fleet for mining activities during the Operations Phases.

Estimated annual GHG emissions averaged over the Operations Phases of the Project are presented in Table 5.4-3, along with a description of the information used to calculate them. As was the case for historical emissions (Table 5.4-1), mobile equipment and fugitive methane emissions represent the bulk of projected GHG emissions during operations (86%).

Table 5.4-3: Estimated Average Greenhouse Gas Emissions during Project Operations with No Additional Mitigation

Emission	Greenhouse Gas Emissions (t CO_2e/yr)	Key Inputs	Comments
Direct GHG Emissions Including:	**760,395**	Direct emissions are a sum of the three emission sources below (mobile equipment, fugitive methane and other fuel combustion).	Emissions from land use change are omitted from this calculation.
Mobile equipment	314,521	Estimates of diesel fuel (haul trucks and other equipment) and gasoline (support vehicles) consumption projections for the mine plan were used. Emissions were estimated using standard emission factors for fuel combustion.	Mobile equipment emissions will vary from year to year depending on mine rock volumes, haul distances, terrain and other factors. New coal and mine rock handling options (Section 4.61.1) could reduce these emissions.
Fugitive methane	340,539	Annual projections of raw coal processed from the mine plan were used as a proxy for raw coal production. Emissions were estimated using the emission factor for bituminous coal in BC from the 2022 National Inventory Report.	EVR will evaluate potential methane recovery as the technologies develop, which could reduce fugitive methane emissions.
Other fuel combustion sources, including heating, coal drying process, and other uses	105,335	Annual projections of consumption of natural gas and propane for heating and coal drying as well as consumption of diesel and fuel oil for blasting from the mine plan were used. Emissions were estimated using standard emission factors for fuel combustion.	EVR continues to evaluate opportunities for more efficient process equipment and other fuel saving opportunities.
Acquired Energy GHG Emissions Including acquired electricity	**177**	Electricity consumption projections from the mine plan were used. Emissions were estimated using the 2030 electricity emission factor for BC from the Draft Technical Guide to the Strategic Assessment of Climate Change (Government of Canada 2021).	Electrification (e.g., with new coal and mine rock handling options) could increase indirect emissions; however, such increases would be less than the associated reduction in direct emissions.
Net GHG Emissions[(a)]	**760,573**	Net GHG emissions = Direct GHG emissions + Acquired energy GHG emissions – CO2 captured and stored – Avoided domestic GHG emissions – Offset credits	At this time, opportunities for CO_2 capture and storage and avoided domestic GHG emissions have not been identified for the Project and are therefore zero in the net GHG emissions calculation. Offset credits have not currently been included in the calculation of net emissions.

a) The formula for net GHG emissions presented in this table follows federal GHG reporting requirements. Under the BC Net-Zero New Industry Policy, the net GHG emissions equation differs from the federal equation in that the BC equation does not include avoided domestic GHG emissions.

GHG = greenhouse gas; t CO_2e/yr = tonnes carbon dioxide equivalent per year; CO_2 = carbon dioxide; EVR = EVR Operations Limited

The potential Project GHG emissions will continue to be evaluated through the assessment process considering the Strategic Assessment of Climate Change (Government of Canada 2020), the Draft Technical Guide to the Strategic Assessment of Climate Change (Government of Canada 2021) and BC's Net-Zero Policy, as announced in the Clean BC Roadmap to 2030 and BC's New Energy Action Framework. This includes evaluation of land use changes, reclamation plans and their potential effects on carbon sinks.[17]

The Project would meet appropriate emissions and GHG regulations and requirements and align with EVR's goal to be net zero across all operations and activities by 2050 (Section 9.1.2).

Consistent with the undertakings of the *Investment Canada Act* (RSC 1985, c 28), EVR has initiated the process of developing an updated climate transition strategy. Work is underway to benchmark steelmaking coal industry peers' medium-term targets for direct and indirect emissions, assess alignment with the Glencore Climate Action Transition Plan and evaluate EVR decarbonization scenarios with respect to what is practical and feasible given existing technologies. EVR continues to evaluate decarbonization solutions including renewable fuels, electrical-assist haulage, electrified light vehicles and buses, processing improvements to reduce natural gas consumption and fugitive methane emissions, and increasing the electrical supply to the Elk Valley to support increasing electrification.

Discussions on the carbon competitiveness of EVR's steelmaking operations and the Project are provided in Sections 2.1 and 10.3.

5.4.3 Other Air Emissions

Other air emissions from FRO are primarily made up of particulate matter (PM), carbon monoxide (CO), sulphur dioxide (SO_2) and nitrogen dioxide (NO_2) (RWDI 2019). The PM emissions arise from mining activities such as drilling, blasting and material handling. The SO_2 and NO_2 emissions are produced by the detonation of explosives for blasting and the combustion of fossil fuels in vehicles, equipment and coal dryers. Like GHG emissions, the Project could also lead to increases in PM, SO_2 and NO_2 emissions due to the increase in hauling and blasting. An emissions inventory will be developed as part of the Project assessment. The Project will include implementation of an air quality and dust control plan and will be designed to contribute to EVR's commitments to climate action (Appendix I). Future potential mitigation measures to reduce GHG emissions, such as mobile fleet electrification, alternative coal drying methods and the use of alternative coal and mine rock handling options (e.g., conveyors), would also reduce other air emissions.

[17] As described in Section 5.1.20, the Project would include approximately 2,031 ha of new disturbance outside of the current FRO Permitted Mine Area. This area consists primarily of forested habitat interspersed with non-forested ecosystems such as grasslands and avalanche paths. Description of the existing ecosystem and vegetation in the vicinity of the Project is provided in Section 9.3.1

5.5 Public and Environmental Safety

This section describes the potential malfunctions or accidents that could occur during the Project's Construction, Operations, Closure and Post-Closure phases. Potential effects of the environment on the Project, including potential effects of climate change and natural hazards, are also considered in Project design and planning, as described in Section 10.3.

During construction activities, the Project could result in a small increase in traffic due to the movement of workers, equipment and supplies. Learnings from other EVR highway safety improvements will be incorporated into necessary traffic planning. Public and environmental safety risks associated with traffic would be managed through implementation of existing FRO procedures, such as driver qualifications, transportation contract requirements, wildlife mitigation and spill response procedures. Geotechnical stability and the risk of potential slope failure during site preparation and road construction would continue to be addressed through geotechnical investigation and engineering design.

During operation of the Project, there would be no substantive change to the risks to public and environmental safety at FRO due to malfunctions or accidents. Geotechnical and slope failure hazards at the Project facilities, including the proposed FRX Pit and mine rock storage areas and possible extension of the CCFR storage facility, have been and would continue to be addressed through the detailed design of the Project as well as through FRO operational procedures including slope monitoring and emergency response plans. Other potential malfunctions or accidents that could occur during operation of the Project include potential failure of water management infrastructure. The associated risks to the environment and, if any, to public safety will be reduced through engineering design, including consideration of climate change, monitoring, emergency response planning and other operational procedures. Potential spills of hazardous materials (e.g., fuel or engine oils) would continue to be managed through FRO design and operational standards, such as fuel and lube station design and containment standards, equipment maintenance, spill response procedures and training. As noted in Section 4.5.2, the selected tailings management alternatives will be designed, constructed and operated in accordance with EVR's internal tailings standards, the Global Industry Standard on Tailings Management (Global Tailings Review 2020) and applicable regulations.

Potential malfunctions or accidents during closure and post-closure, such as potential slope failures, will be addressed during detailed design and planning for closure.

Specific malfunction and accident scenarios involving the Project facilities that could affect the environment or public safety would be evaluated through the assessment process.

5.6 Mine Reclamation and Closure

EVR's approach to closure design and implementation is directed by closure objectives that consider:

1) Long-term safety and stability of drainages, landforms and features, including water quality that meets acceptable quality guidelines for safe release to the surrounding environment and use by local flora and fauna.
2) Contribution toward the commitment that EVR will become a nature positive business by conserving or rehabilitating at least three hectares for every one hectare affected by its mining activities going forward. To support the nature positive commitment, EVR is continuing large-scale reclamation programs and conservation management in the Elk Valley region, taking into consideration provincial objectives for cumulative effects management in the region. Existing operations have contributed to more than 7,000 ha of conservation lands, which are jointly managed with the KNC through a Joint Management Agreement (refer to Section 7.1.2).

Early Engagement Feedback Note

Early engagement on the Project included feedback requesting more information about mine reclamation and closure. More detailed reclamation and closure plans will be developed later in the assessment process as effects of the Project on biodiversity and land use targets are better understood. Some of the feedback will be addressed once assessment of the Project is complete and when plans are finalized.
This section of the DPD provides high level information about reclamation and closure and the considerations that will be incorporated into Project plans as they are developed in more detail.

The reclamation and closure plan at FRO is intended to progressively reclaim and close areas over the life of the operation as they become available (i.e., when it is safe and once there is no future mining or other planned re-disturbance in the area). Water management and treatment requirements are first evaluated to determine if more sustainable long-term mitigations are warranted. Decommissioning is planned for infrastructure no longer required to support long-term water management, treatment and monitoring. After plans for long-term water management, treatment, monitoring and infrastructure are determined, recontouring and revegetation planning would be completed to set the landscape on the intended trajectory toward land use objectives. Water and reclamation monitoring would then be conducted to verify the effectiveness of water management/treatment mitigations and success of the reclamation prescriptions. Pending monitoring results, modifications to water management/treatment mitigations and/or reclamation prescriptions may be required.

The goal of reclamation and closure is to establish sustainable, diverse and functional watercourses and landscapes on an ecological trajectory toward natural conditions. Land use objectives focus on ecosystem rehabilitation and recognizing shifts in vegetation communities as the ecosystems mature. Final watercourse objectives focus on re-establishing stable long-term water flows, water quality and fish habitat. This approach requires long-term consideration that may include natural changes to land uses and aquatic habitat over time. As part of ongoing reclamation and closure planning, EVR is actively seeking opportunities to incorporate landforms and watercourses that will contribute to the success of reclamation and closure plans.

Integral to successful reclamation is the incorporation of Indigenous knowledge and values during reclamation planning, implementation and monitoring. Fording River Operations has been working with the Ktunaxa Nation since 2021 on a reclamation collaboration project at the Brownie site, where landform design, soil placement and vegetation prescriptions have been developed by EVR and the Ktunaxa Nation working together. This collaboration has resulted in reclamation that connects adjacent ecosystems for wildlife movement, while providing a diversity of habitat types. Reclamation work is ongoing at this site, but shared learnings are actively

being incorporated at other reclamation sites across EVR sites, demonstrating the value of this collaboration and incorporation of Indigenous knowledge and values.

Adapting an ecosystem approach, including the ecosystem classifications from natural conditions, acts as a surrogate for habitats for a variety of wildlife. The intent is to focus on the rehabilitation of functioning ecosystems and, through this, many different habitats for plants and animals will be created. This approach for the Project's reclamation and closure plan aligns with FRO's Biodiversity Management Plan process that identifies numerous ecosystems and VCs and assigns them to specific ecosystem types. The vision is to rehabilitate the ecosystem in a manner that benefits many ecosystems and VCs, as opposed to targeting a single habitat type. Fording River Operation's Biodiversity Management Plan provides an overview of the various actions, planning processes and plans that together represent FRO's work toward becoming nature positive. The Biodiversity Management Plan for FRO has been developed in collaboration with the KNC through the Biodiversity Management Technical Advisory Group (TAG); it will evolve over time and reflects improved understanding of the impacts and effectiveness of mitigation actions.

Reclamation and closure research is necessary to develop successful operational reclamation and closure plans while advancing general reclamation and closure knowledge. The results of this research are used to develop effective reclamation and closure plans satisfying both short- and long-term objectives. Fording River Operations has a history of commissioning reclamation and closure research (Photo 5.6-1) dating back to 1969 when initial environmental and reclamation evaluations were conducted. Further reclamation research information is available in Section 9.1.2.

Photo 5.6-1: Reclamation Research Site at Fording River Operations



The final reclamation and closure plan for the Project will consider reclamation and closure options that account for mining progressing to Stage 2 or ending following Stage 1, will be guided by site and regional research, provincial objectives for cumulative effects management (e.g., the EV-CEMF and the other regional studies, initiatives, plans and programs listed in Section 9.1.2), ecosystem and species management plans, and

experience and consultation with potentially affected Indigenous Peoples, the public and government agencies. Future landscape and watercourse modification and rehabilitation will include proven practices in use at EVR mines in the Elk Valley as well as emerging technologies and practices identified through ongoing research and development. This approach is consistent with the requirements of the current legislation, FRO's existing C-3 Permit and its various amendments. Innovation in reclamation and watercourse rehabilitation will be encouraged throughout the Project and used in conjunction with proven techniques.

The Project's reclamation and closure plan will consider:

- integration with and, where necessary, adjustment to reclamation and closure plans for existing and permitted FRO activities
- progressive reclamation and closure of Project components as they become available
- long-term safety, stability and environmental performance
- alignment with EVR's sustainability goals so that reclamation and closure of non-Project components, interim reclamation, and progressive reclamation and closure all tie into temporal and long-term requirements
- engagement with potentially affected Indigenous Peoples, the public and government agencies about land use, closure objectives and geomorphic design of the closure landscape to support target ecosystems and habitat[18]
- engagement with potentially affected Indigenous Peoples, the public and government agencies regarding impacts, mitigations and objectives related to social and economic impacts of closure

Through application of the above considerations, reclamation and closure activities will occur throughout the life of the Project. Following the conclusion of mining operations at FRX (following either Stage 1 or Stage 2), the entire FRO site will transition into the Closure Phase focused on final decommissioning of infrastructure not required to support long-term water management/treatment or other functions maintaining site regulatory compliance and reclamation of the surrounding areas. A post-closure period of monitoring and maintenance will follow the Closure Phase, with activity reducing as the long-term effectiveness of reclamation and water management mitigations is demonstrated. Most of the water management and treatment infrastructure active at the end of mining is expected to remain operational on both the FRX and FRO footprint post-closure until monitoring demonstrates that regulatory compliance can be met without treatment. Once it is no longer required, final decommissioning of water management and treatment infrastructure will be completed and the surrounding areas reclaimed.

5.7 Water Use

Fording River Operations has three consumptive use water licences issued by BC Ministry of Water, Land and Resource Stewardship (BC WLRS). Each of these water licences contains conditions limiting water withdrawal to maximum daily and annual use volumes from 22 specific points of diversion (PODs):

- C133241 for vehicle and equipment (truck washing), with a yearly licensed limit of 1,892,160 m^3

[18] The Project envisions employing sessions like the EVO Making Wild Places workshop conducted between Teck and KNC for planning at EVO.

- C133242 for well drilling/transportation corridor management (dust control), with yearly licensed limit of 10,950,000 m^3
- C133243 for mining purpose (washing coal), with yearly licensed limit of 18,259,490 m^3

In addition, instream flow requirements (IFRs) in each of the licences require EVR to stop diverting and using water from almost all of the shorter travel time PODs as well as some of the longer travel time PODs when flows in the upper Fording River and/or Henretta Creek fall below the applicable IFR. Each licence also requires EVR to implement a long-term monitoring program.

On December 8, 2023, FRO received an order increasing the IFRs in the referenced licences as a measure to support the continued recovery of the WCT population while the Province reviews the final Operational Environmental Monitoring Program (2018 to 2022).

Actual annual consumptive water uses vary year to year and are maintained within these licensed limits. A summary of recent water consumption at FRO is provided in Table 5.7-1.

Table 5.7-1: Consumptive Water Uses at Fording River Operations

Use	Water Consumption (m^3)	
	2022	2023
Vehicle and equipment (truck washing)	373,775	362,907
Well drilling/transportation corridor management (dust control)	376,656	240,738
Mining purpose (washing coal)	2,936,708	2,044,999

Domestic water needs at FRO are met by existing licensed groundwater wells. In addition, FRO uses bottled water for potable water consumption and is assessing alternative sources, such as using the existing potable water wells, for site domestic water use.

Water consumption for the Project would remain similar to the existing water consumption at FRO. As the Project would be an extension to FRO, some of the Project water use would be specific to the Project mine area and some would be associated with FRO (Table 5.7-2). Water use in the Project mine area would support mining only, and FRO water use would include coal processing. The Project tailings handling and storage plan could result in some changes to FRO process water management, as tailings dewatering (Section 4.51.1) could recover water directly from the dewatering process instead of the South Tailings Pond and the Turnbull TSF. A water reservoir/in-pit storage in the north half of the Project is planned to support use of mine-influenced water, reducing draws from other sources.

This section of the Revised DPD was updated from the provincial and federal IPD documents with minor clarifications and the addition of current consumptive water use information and tailings storage considerations.

Table 5.7-2: Water Use Specific to the Fording River Extension Project and Fording River Operations Activities Related to the Project

Water Use	FRX Mine Area	FRO Water Related to the Project
Process Water Non-potable water used in the FRO Coal Processing Plant.	No process water (coal washing) would be used at the Project mine area. All processing for the Project would occur at FRO.	The volume of process water requirement at the FRO Coal Processing Plant would remain at current levels as the processing rates would remain unchanged by the Project. If tailings management transitions toward dewatering (Section 4.5.21.1), the majority of water from the tailings slurry, which currently discharges to the South Tailings Pond, will be recovered directly from the dewatering process for re-use at the FRO Coal Processing Plant.
Potable Water Bottled water for human consumption.	Potable water needs for the Project mine area would be met by a third-party supplier of bottled water.	There would be no change to potable water use at FRO due to the Project.
Domestic Water Non-potable water for domestic use in offices and mechanical shops, for example.	Domestic water needs at the Project mine area would be limited to the satellite offices and maintenance shops, for example. EVR will evaluate trucking water from FRO, local groundwater wells, or use of and possibly storage of surface water. Domestic water for the Project might require amendment to FRO's existing water licences (Section 6.4) or obtaining new licences for groundwater wells or surface water use and possibly storage.	There would be no change to domestic water use at FRO due to the Project, except for a reduction of use due to workers using domestic water at the Project mine area rather than existing FRO facilities if a suitable alternative is found. Domestic water needs at FRO would continue to be met by existing licensed groundwater wells.
Dust Control Water Non-potable water for spraying on roads, stockpiles or other areas to reduce dust entering the air.	Dust control water needs at the Project mine area could be met by trucking water from FRO, local groundwater wells, mine-influenced water, or use of and possibly storage of surface water. Dust control water for the Project might require amendment to FRO's existing water licences (Section 6.4) or obtaining new licences for groundwater wells, mine-influenced water, or surface water use and possibly storage.	As dust conditions vary from year to year due to other environmental factors, dust control water use is expected to remain similar to current use. Dust control water needs at FRO and the Project site would continue to be met by existing licensed surface water sources or from the reservoir.
Drilling Water For the purposes of this discussion, drilling water is non-potable water used to operate drills during construction and mining.	Drilling water needs at the Project mine area could be met by trucking water from FRO, local groundwater wells, or use of and/or storage of surface water. Drilling water for the Project might require amendment to FRO's existing water licences (Section 6.4) or use of and/or storage of surface or mine-influenced water.	It is likely that there will be some drilling water use at FRO due to the Project if local groundwater wells or use of stored surface water is not feasible.

FRO = Fording River Operation; EVR = EVR Operations Limited.

Fording River Operations, along with other EVR operations in the Elk Valley, continue to update and implement measures to reduce water reduction, especially during drought conditions. This entails the application of a hierarchy of controls to water management and water conservation measures to support competing human and ecosystem needs. This hierarchy of controls, where feasible, targets a reduction in freshwater use, recycling and reusing treated water, and the prioritization of water use from sources with the least impacts on the ecosystem receptors (e.g., rivers, fish habitat, aquifers). Some water licences, such as at FRO, also include IFRs as a built-in regulatory mechanism to manage water use.

Consistent with this approach, the FRX Project would continue to identify and implement water reduction measures and leverage those already in place at FRO.

6.0 Regulatory Framework

This section of the Revised DPD includes a discussion of:

- thresholds for assessment under the BC EAA and how the Project relates to those thresholds
- thresholds for assessment under the federal IAA and how the Project relates to those thresholds, along with information about the designation of the Project under this act
- other federal approvals that might be required for the Project
- other provincial permits and approvals that might be required for the Project
- proposed assessment schedule
- relevant studies, plans and/or regional assessments that may be relevant to the assessment of the Project
- potentially relevant agreements
- interactions with other existing approvals

6.1 *Environmental Assessment Act* of British Columbia

The Project is reviewable under the BC EAA. According to Section 3(2), Section 10(1) and Table 6 of the *Reviewable Projects Regulation*, BC Reg 243/2019, proposed modification of an existing coal mine is reviewable under the BC EAA if:

- the existing project that is subject to the modification, or the modification, has a production capacity in excess of 250,000 t/yr of clean coal or raw coal or both
- the modification will result in the disturbance of an area of land that was not previously permitted for disturbance and that is at least 50% of the area of land that was previously permitted for disturbance at the existing project

According to Section 4(1) and Table 6, even if the thresholds under Section 3 are not met, a project is reviewable if:

- it emits 380,000 t or more per year of one or more GHGs directly from project facilities, measured in carbon dioxide equivalents, determined in accordance with Part 3 of the *Greenhouse Gas Emission Reporting Regulation*, BC Reg. 249/2015, or
- it includes the clearance of 600 ha or more of land, unless the clearance has been authorized by the Minister, or delegate, under the *Resort Timber Administration Act*, SBC 2006, c 30

The Project does not include a change to FRO's current production capacity.[19] Given that FRO's current production rate is higher than the threshold in the *Reviewable Projects Regulation,* the Project would be reviewable if either the percent change in area or total area exceeds the thresholds (per Section 3(2) or Section 4(1), respectively) noted above. Similarly, the Project would be reviewable if it emits 380,000 t or more per year of one or more GHGs directly from Project facilities.

19 FRO's design capacity is 10 Mmtcc per year and typical annual production is between 8.5 and 9.5 Mmtcc.

The Project footprint (Section 5.1.20, Figure 5.1-1) includes 2,031 ha of land outside of the existing FRO Permitted Mine Area (Table 6.1-1) and an increase of the area of mine operations of 28.0%. While the Project does not meet the percentage change threshold under Section 3(2) of the regulation, it does meet the total area threshold under Section 4(1) of the regulation. Based on the information in Section 5.4.2, Project facility emissions will also likely exceed the GHG emissions threshold in Section 4(1). This means that the Project will require review under the BC EAA.

Table 6.1-1: Project Footprint Disturbance Areas

Disturbance Type	Disturbance Location	Disturbance Area (ha)
Disturbance of land related to the Project outside existing authorized boundary (new disturbance)	Outside the FRO C-3 Permitted Mine Area	2,031
Disturbance of land related to the Project inside existing authorized boundary[(a)]	Inside the FRO C-3 Permitted Mine Area	2,295
	Total:	**4,326**
Existing FRO authorized boundary	FRO C-3 Permitted Mine Area	7,248
Percent new disturbance compared to current permitted mine area: New disturbance/existing permitted mine area = 2,031 ha/7,248 ha		**28.0%**

a) Area previously permitted for FRO based on *Mines Act* C-3 Permit. This area includes all areas currently under active disturbance and all areas permitted for future disturbance. FRO = Fording River Operations.

The IAAC and the BC EAO have been developing the draft TISG/AIR, and EVR has provided input to this process. The TISG/AIR will set out issues that will be addressed during subsequent phases of the coordinated assessment and will consider the Project-environment interactions identified in Appendix I. The draft TISG/AIR document may be further updated by the IAAC and BC EAO during the Process Planning Phase of the assessment process.

6.2 *Impact Assessment Act* of Canada

According to Section 19(a) of the *Physical Activities Regulations* (SOR/2019-285) under the IAA, expansion of an existing coal mine is considered a designated project under the IAA if the expansion would result in an increase in the area of mining operations of 50% or more and the total coal production capacity would be 5,000 t/d or more after the expansion.

Prior to submitting the provincial IPD, Teck (now EVR) contacted the IAAC to determine whether the Project was described in the *Physical Activities Regulations* under the IAA. Information provided to IAAC outlined that the Project would increase the area of existing mining operations at FRO by an additional approximately 33% and that the extension would have a total production capacity of 27,400 t/d. The IAAC responded that the Project, as described, would be below the threshold described in the regulation, and as a result it was the IAAC's view that the Project would not be a designated project under the regulations.

The IAA also states in Section 9(1) of the IAA that the Minister of Environment and Climate Change Canada may designate a physical activity that is not prescribed by regulations if carrying out that physical activity may cause adverse effects within federal jurisdiction or adverse direct or incidental effects, or if public concerns related to those effects warrant the designation.

Following the posting of the provincial IPD to the BC Environmental Assessment Project Information Centre in April 2020, the IAAC received eight written requests that the Project be designated for assessment under the IAA. On August 19, 2020, and following consideration of the designation requests and other factors set out in the IAA, the federal Minister of Environment and Climate Change Canada issued an Order designating the Project, pursuant to Section 9(1) of the IAA[20]. The reasons for the decision are posted in the Minister's response and included:

- While the area of mining operations of the Project would be below the 50% threshold for a mine expansion, it would be above the total coal production capacity threshold of 5,000 t/d described in Item 19(a) of the *Physical Activities Regulations*.
- The Project may cause adverse direct and cumulative effects on areas of federal jurisdiction, including transboundary environments.
- Concerns were expressed by potentially affected Indigenous Peoples, federal authorities, other jurisdictions and members of the public that relate to adverse effects within federal jurisdiction or adverse effects that may not be fully addressed by the provincial assessment process or through provincial or federal permitting for the Project (specifically, effects to transboundary environments, fish and fish habitat, and Indigenous Peoples).
- The Project may cause adverse impacts to Aboriginal and Treaty rights and matters related to potentially affected Indigenous Peoples within federal jurisdiction that cannot be addressed through existing legislative and regulatory mechanisms.
- The impact assessment of a designated project must take into account the factors identified in Section 22 of the IAA, the scope of which will be identified in the TISG/AIR. As noted previously, the TISG/AIR is under development and a list of potential Project-related effects, including potential effects within federal jurisdiction, is presented in Appendix I.

6.3 Other Federal Approvals

Depending on the final configuration of the Project, the following federal approvals or permits may be required for the Project:

- *Fisheries Act* (RSC 1985, c F-14) authorization will be required if the Project cannot avoid the harmful alteration, disruption or destruction (HADD) of fish habitat (as per Section 35 of the *Fisheries Act*) or the death of fish (as per Section 34.4 of the act).
- *Species at Risk Act* (SC 2002, c 29; SARA) permits may be required if the Project impacts critical habitat of aquatic species or migratory birds as defined under the *Migratory Birds Convention Act, 1994* (SC 1994, c 22).
- *Explosives Act* (RSC 1985, c E-17) permits would be required for storage explosives magazines needed to support the Project.
- *Coal Mining Effluent Regulations* (pending) authorization may be required once the regulations come into force.

[20] Note that on July 31, 2024, review of the FRX Project was officially transitioned to the amended IAA following Royal Assent of the *Budget Implementation Act, 2024, No. 1*.

EVR will have other federal regulatory reporting and planning requirements (e.g., those under the *Environmental Emergency Regulations, 2019* [SOR/2019-51], of the *Canadian Environmental Protection Act*, *1999* [SC 1999, c 33], for handling and management of explosives and other hazardous substances).

EVR is the sole proponent of the Project. The federal government has not been requested to provide, nor is it providing, any current or future financial support for the Project.

> **Early Engagement Feedback Note**
>
> Early engagement on the Project included feedback about possible Project permits and approvals. EVR proposes this feedback be considered in the development of the draft Project permitting plan to be developed during the Process Planning phase of the assessment, assuming the IAAC and the BC EAO and the IAAC determine that the Project should proceed through the next phases of the assessment process.

6.4 Other Provincial Permits and Approvals Required for the Project

A summary of the key authorizations or permits potentially required for the Project is presented in Table 6.4-1. There are several existing FRO permits that will require amendment for the Project. There are also new permits that may be required. The assessment process will include a Regulatory Coordination and/or Permitting Plan to be developed by the IAAC and the BC EAO. This plan will help to clarify permitting requirements so that issues are addressed at the right time under the pertinent regulatory process. Decisions on provincial and/or federal permits would only be made once the Project is authorized to proceed under the BC EAA and/or the IAA.

EVR will engage with the BC MCM Major Mines Permitting Office to align on the provincial permits, licences, approvals and authorizations required for the Project and to establish the coordinated review process through a Mine Review Committee. The Mine Review Committee is anticipated to include representatives from the BC MCM, the BC Ministry of Environment and Parks (BC EP), the BC Ministry of Forests (BC MoF), the BC WLRS, KNC and Yaq̓it ʔa·knuqƛi ’it. The coordinated review process has four main stages: preapplication engagement, application screening, application review and final decisions. While applications are reviewed and recommendations provided through the Mine Review Committee, the Statutory Decision Maker retains responsibility for final decisions. EVR anticipates a timeline of approximately six months for this process.

EVR intends to proceed with provincial permitting for portions of the Project mine in sections. This is due to the amount of information required to meet permitting requirements, such as the Joint Application Information Requirements for the *Mines Act* and *Environmental Management Act* permits. These sections will allow for continued advancement of understanding of these sections of the mine plan, adaptation to learnings from mining of previous pits, and continued engagement with KNC and Yaq̓it ʔa·knuqƛi ‘it. Anticipated provincial authorizations and permits potentially required for the Project are listed in Table 6.4-1.

Table 6.4-1: Summary of Key Provincial Authorizations or Permits Potentially Required for the Project

Statute	Agency	Authorization or Permit	Project Component or Activity	Project Requirements
Mines Act, RSBC 1996, c 293	BC MCM	*Mines Act* C-3 Permit[(a)]	Facilities and infrastructure for the Project	Amend FRO permit to authorize Project activities (e.g., Project pit, mine rock storage areas, water management structures, infrastructure and footprint) through construction, operations and reclamation
Mines Act	BC MCM	Explosives Magazine Storage and Use Permit[(a)]	Storage and use of explosives	Amend FRO permit for Project explosives
Coal Act, SBC 2004, c 15	BC MCM	Coal Lease, Multiple	Long-term production of coal	Conversion of coal licences to coal leases within the Project footprint
Environmental Management Act, SBC 2003, c 53	BC EP	Waste Discharge Permit – Effluent AMS424[(a)]	Land disturbance for construction activities; tailings storage may be addressed through separate permitting process	Amend FRO permit for Project discharges during construction (sediment control) and operations
Environmental Management Act	BC EP	Waste Discharge Permit – Effluent AMS107517[(b)]	Effluent discharge to the land and water from five coal mine sites located in the Elk Valley	Amend EVR area-based permit for Project discharges of contact water
Environmental Management Act	BC EP	Waste Discharge Permit – Refuse AMS7726[(a)]	Disposal of office and shop waste (e.g., domestic garbage)	Amend FRO permit for Project-related waste disposal sites and waste volumes
Environmental Management Act	BC EP	Waste Discharge Permit –Air Emissions AMS1501[(a)]	Emissions discharge to the air	Amend FRO permit if Project requires updates related to dust control or monitoring or discharges from new facilities
Environmental Management Act	BC EP	Hazardous Waste	Produce, store, treat, recycle or discharge hazardous wastes	Obtain permit as required
Water Sustainability Act, SBC 2014, c 15	BC WLRS	Water Licence C133241[(a)] C133242[(a)] C133243[(a)]	Beneficial use of water from multiple sources	Amend FRO permits if Project requires updates related to water requirements for dust control; potential need for new water licences associated with water management or non-potable water supply wells
Heritage Conservation Act, RSBC 1996, c 187	BC WLRS	Heritage Investigation Permit	Alteration, recovery or destruction of archaeological sites	Obtain new permits as required for Project disturbance
Heritage Conservation Act	BC WLRS	Site Alteration Permits Multiple	Alteration, recovery or destruction of archaeological sites	Obtain new permits as required for Project disturbance
Heritage Conservation Act	BC WLRS	Concurrence Letters	Alteration, recovery or destruction of archaeological sites	The Archaeology Branch issues letters to the BC EAO, stating that appropriate assessment under the *Heritage Conservation Act* is complete
Land Act, RSBC 1996, c 245	BC MoF	Temporary Occupation of Crown Land, Crown Licence of Occupation	Permission to enter, occupy and use provincial Crown land on a temporary basis pending completion of survey requirements and issuance of statutory rights-of-way	Obtain licence as required
Public Health Act, SBC 2008, c 28	BC Ministry of Health	BC *Sewerage System Regulation* (BC Reg 76/2022) Permit	Permits sewage disposal systems, if included as part of the satellite office	Obtain new permit as required
Forest Act, RSBC, c 157	BC MoF	Occupant Licence to Cut	Tree removal	Obtain licence as required
Forest and Range Practices Act, SBC 2002, c 69	BC MoF	Road Use Permit	Road building	Obtain permit as required

Table 6.4-1: Summary of Key Provincial Authorizations or Permits Potentially Required for the Project

Statute	Agency	Authorization or Permit	Project Component or Activity	Project Requirements
Wildlife Act, RSBC 1996, c 488	BC EP	Authorization or Exemption Permits	Vehicle operation in areas closed under the *Wildlife Act* and various activities related to wildlife management that may arise	Obtain permit as required

a) Current FRO authorization or permit.
b) Current area-based permit that includes FRO.

BC MCM = British Columbia Ministry of Mining and Critical Minerals; BC EP = British Columbia Ministry of Environment and Parks; BC MoF = British Columbia Ministry of Forests; BC WLRS = Ministry of Water, Land and Resource Stewardship; RSBC = Revised Statutes of British Columbia; FRO = Fording River Operations; SBC = Statutes of British Columbia; EVR = EVR Operations Limited; BC EAO = British Columbia Environmental Assessment Office.

Section 5.7 provides more information about Project water use and permitting considerations. Section 9.5 provides more information about land use plans relevant to the Project.

6.5 Proposed Assessment Schedule

A preliminary schedule for major assessment and permitting process milestones is presented in Table 6.5-1. This schedule is subject to change as the details of the coordinated provincial and federal assessment process become available.

Table 6.5-1: Preliminary Coordinated Assessment, Permitting and Project Milestone Schedule

Milestone/Activity	Timing (single dates represent end dates)
Early engagement with KNC and Yaq̓it ʔa·knuqƛi ’it; local, provincial and federal governments; and local community (non-governmental) organizations	2018 through 2019
BC EAO accepts provincial IPD and Engagement Plan, initiating the assessment process under the BC EAA	April 2020
Early engagement with KNC and Yaq̓it ʔa·knuqƛi ’it; local, provincial and federal governments; local community (non-governmental) organizations; and interested members of the public	April through June 2020
BC EAO releases a Summary of Engagement and direction for a DPD	July 2020
Federal Minister of Environment and Climate Change Canada designates the Project under the IAA	August 2020
IAAC accepts and posts the federal IPD and IPD Summary	October 2020
IAAC Comment Period on the federal IPD (20 days)	November 2020
IAAC issues Summary of Issues	November 2020
Teck (now EVR) submits DPD to jointly fulfill requirements of IAA and BC EAA	July 2021
Draft Readiness Decision	March 2022
KNC Triggers Dispute Resolution	April 2022
Dispute Resolution Process Concludes	December 2022
Readiness Decision with direction for Revised DPD	February 2023
EVR submits Revised DPD to jointly fulfill requirements of IAA and BC EAA	Q3 2025
IAAC and BC EAO decisions on whether the Project should move to next stage of the assessment process (IAAC Notice of Determination and BC EAO Readiness Decision)	Q3 2025

Table 6.5-1: Preliminary Coordinated Assessment, Permitting and Project Milestone Schedule

Milestone/Activity	Timing (single dates represent end dates)
Joint Process Planning Phase In this phase, the IAAC and the BC EAO will issue the TISG/AIR and other notices, orders and/or plans that will support the assessment process: • **Under the IAA** - Public Participation Plan, Indigenous Engagement and Partnership Plan, Impact Assessment Cooperation Plan, Permitting Plan and Notice of Commencement • **Under the BC EAA** - Process Order, Regulatory Coordination Plan and Assessment Plan and Terms of Reference for the Technical Advisory Committee and the Community Advisory Committee (if determined necessary) EVR anticipates that some of these documents may be coordinated or issued jointly by the IAAC and the BC EAO, should the Project proceed to this stage of the assessment process.	Q4 2025
EVR submits IS/A to meet the assessment requirements under the IAA and the BC EAA	Q4 2026
Agency conformity review followed by public, Indigenous and Technical Advisory Committee review of IS/A	Q4 2026 through Q3 2027
EVR submits joint Revised IS/A for the assessment under the IAA and BC EAA	Q4 2027
Agencies Issue Draft Assessment Reports	Q1 2028
BC EAO releases Certificate Decision	Q3 2028
IAAC releases Impact Assessment Decision	Q3 2028
Submit provincial permit applications	Q2 2028
Provincial agencies release permit application decisions	Q4 2028
Start of Stage 1 construction activities	Q4 2028
Start of Stage 1 mining operations	Q4 2030
Decision to proceed to Stage 2 mining operations	Early 2040s
Start of Stage 2 construction activities	2044
Start of Stage 2 mining operations	2046
Cessation mining operations, start of closure	approx. 2065

IPD = Initial Project Description; IS/A = Impact Statement/Application; KNC = Ktunaxa Nation Council; DPD = Detailed Project Description; Q = quarter; TISG/AIR = Joint Tailored Impact Statement Guidelines/Application Information Requirements; BC EAO = British Columbia Environmental Assessment Office; BC EAA = British Columbia *Environmental Assessment Act;* IAA= I*mpact Assessment Act ;* IAAC = Impact Assessment Agency of Canada; EVR = EVR Operations Limited.

6.6 Relevant Studies, Plans and/or Regional Assessments

EVR plans on assessing GHG emissions in accordance with the Strategic Assessment of Climate Change (Government of Canada 2020) and considering the British Columbia Net-Zero New Industry Policy. Additional information on GHG emissions for the Project is included in this document in Section 5.4.2. While, no other federal studies, plans or regional assessments are relevant to the Project, several provincial plans are relevant and can be used to guide the assessment of the Project. These include, for example, land use plans, the Elk Valley Cumulative Effects Management Framework (EV-CEMF) and the EVWQP. Relevant regional environmental studies, initiatives, plans and programs are discussed in Section 9.1.2. Land use plans are discussed in Section 9.5.

6.7 Potentially Relevant Agreements

Potentially relevant agreements made by the Government of Canada, the Government of British Columbia and EVR that may help guide engagement and/or the scope assessment process for the Project are identified in Appendix D.

6.8 Interactions with Other Existing Approvals

Since the FRX Project has been delayed, GHO is no longer considering mining a portion of the Swift Project and this permitted area will remain within FRO operations. The Project footprint will not have direct overlap with existing approvals associated with mining at GHO.

The Project may necessitate refinements to the clean water diversion project planned for Kilmarnock Creek. The potential need for refinements and the potential need for subsequent changes to permits for the clean water diversion project will be evaluated as part of the assessment of the Project. The Project will also have some minor overlap with the Swift Project associated with connection to the existing power substation. Permitting changes that may be necessitated as a result of approval of the FRX Project will be addressed under permitting processes separate from that being undertaken for the FRX Project.

7.0 Potentially Affected Indigenous Peoples

7.1 Ktunaxa Nation

7.1.1 Introduction Provided by Ktunaxa Nation

The Project lies within ʔamakʔis Ktunaxa, the unceded and unsurrendered territory of the Ktunaxa Nation, and is located within the Ktunaxa district of Qukin ʔamakʔis or Raven's Land. Qukin ʔamakʔis extends from the headwaters of the Elk River downstream to near the town of Elko, an area of more than 3,500 km^2. We, the Ktunaxa Nation maintain underlying Indigenous title and stewardship responsibilities for all lands and waters within ʔamakʔis Ktunaxa, including the Elk Valley and the Project area.

The Ktunaxa Nation is composed of four communities and their members in Canada, including: yaq̓it ʔa·knuqƛi'it (Tobacco Plains Band), ʔaq'am (St. Mary's Band), yaqan nuʔkiy (Lower Kootenay Band) and ʔakisq̓nuk First Nation (Columbia Lake Band). These communities, and the interests of all Ktunaxa citizens in Canada, are represented by the Ktunaxa Nation Council (KNC). There are also two Ktunaxa communities in the United States of America; k̓upawiɬq̓nuk (Confederated Salish & Kootenai Tribes) in Elmo, Montana and ʔaq̓anqmi (Kootenai Tribe of Idaho) in Bonners Ferry, Idaho.

Within the borders claimed by Canada and British Columbia, ʔamakʔis Ktunaxa covers approximately 70,000 km^2 (27,000 square miles) of mountains, valleys, rivers and lakes in the Kootenay region. The region's landscape is alive with Ktunaxa culture and history. The Ktunaxa creation story relates the origins of our people and describes the events and relationships that helped shape – and continue to shape – ʔamakʔis Ktunaxa. As told by elder Wilfred Jacobs, the creation story tells of a chase involving powerful animal beings that travelled the Columbia and Kootenay valleys in a loop, before the rivers were separated, creating and naming the landscape. The creation story culminates in the creation of humans, including our own people, the Ktunaxa, and our covenant with the creator to take care of the land and water. The geography and geology of the Elk Valley is formed in the final events of the story, when the animal chief and creation hero, Naƛmuqɬin, collapses, forming the Rocky Mountains with his body. His feet stretch to ya·ƛiki near the Yellowhead Pass, and his head lies in the area of Yellowstone Park in Montana.

The Elk Valley was traditionally used and occupied by the Ktunaxa people prior to and after 1846, the date of the Oregon Boundary Treaty between the USA and the British Crown. Important settlements were maintained by our people in the Elk Valley well into the 20th century, and our citizens continue to reside throughout the valley, including in Sparwood, Fernie, and elsewhere. As well, we have maintained use and occupancy throughout the Elk Valley, including in the area of the Fording River and the Fording River Extension Project, despite widespread impacts from coal mining, forestry, and other activities in the area. While there are no reserve lands in the Elk Valley, our oral history indicates that reserve areas were promised in the area of Michel Flats and present day Sparwood but were never formally allotted.

Today, our Knowledge Holders recognize the Elk Valley for the richness of its fish and game, its connection to our oral history, and also for the presence of coal, the legacy of impacts from extensive coal mining, and associated restrictions on access to lands, many of which were privatized in the early 20th century. The diverse land forms, waters, animals, and plants that help sustain our rights, and to which we owe a responsibility of stewardship, are under pressure from industrial development and change. Valley bottoms, traditionally maintained through fire cycles as open forests and grasslands, are now threatened in many places by mining, fire suppression, uptake of private land, energy transmission, hydro-electric reservoirs, agriculture, and transportation systems. Higher altitude valleys and slopes, including high elevation grasslands on south and east facing slopes, provide critical habitat for culturally important species such as elk, deer, sheep, and grizzly bear and are impacted in many areas by forestry, mining, recreational development, and associated road networks. Ktunaxa citizens and leadership, as communicated through KNC, have serious concerns regarding water quality and cumulative effects in the Project area, specifically related to increases in selenium and other contaminants (e.g., cadmium, nitrate, sulphate) in critical fish-bearing waterways including the upper Fording. Coal mines in the Elk Valley, including FRO operations, have seriously affected and continue to affect water quality and at risk fish populations in the area, with Chauncey Creek being one of the last major tributaries of the Fording River that remains relatively unimpacted by industrial coal mining.

Despite past impacts, our citizens continue to maintain deep cultural connections with the lands and waters of Qukin ʔamakʔis, including the area of Castle Mountain. Our practice of rights, including learning, reinforcing, and passing on place-based knowledge and language, depends on the ability of our citizens to continue to access and teach our children and youth through experience in culturally preferred places, with confidence in preferred animals and resources, and the ability to freely practice rights within culturally and ecologically functional landscapes. While areas north and west of the Project have been intensively mined and industrial impacts make many areas no longer useable by our citizens, the area of Castle Mountain and the Chauncey drainage remain important and vital with a network of documented trails and camps used by Ktunaxa to hunt elk, sheep and other animals, fish, harvest plants and medicines, and access nearby passes and other cultural areas.

If the Project proceeds the existing area excluding Ktunaxa use around the FRO mine would be expanded to include the Project area. Representatives of the KNC are engaged on implementation of EVR's EVWQP, Aquatic Monitoring Program, Research and Development updates and Biodiversity Program. The KNC also holds a seat on the Environmental Monitoring Committee (EMC), which is an independent body established under the Elk Valley Environmental Management Act Permit 107517 (Section 9.1.2).

While KNC's relationship with Teck (now EVR) has improved in recent decades, and there has been some success in improving benefits for most Ktunaxa citizens, the history of coal mining within Qukin ʔamakʔis has been an almost entirely negative influence. Efforts by Teck (now EVR) and KNC to work collaboratively in preparing this Project Description give cause for hope that this Project may improve the situation in the Elk Valley and ʔamakʔis Ktunaxa, rather than further erode it. Whether this potential is realized will depend on continued efforts by EVR to work with KNC and

other regulators towards a full assessment of, and accommodation for, impacts of the Project to Ktunaxa title, rights and interests.

7.1.2 Summary of Engagement with Ktunaxa Nation

As noted above, the Project would be located within ʔamakʔis Ktunaxa. Reserve lands of the Ktunaxa Nation are illustrated in Figure 5.1-3, with the largest reserve areas consisting of the Tobacco Plains (Yaq̓it ʔa·knuqƛi ’it), Kootenay 1/ St. Mary’s (ʔaq’am), Lower Kootenay (yaqan nuʔkiy) and Columbia Lake (ʔakisq̓nuk) reserve areas.[21] Note that throughout this Revised DPD, when references are made to Ktunaxa or Ktunaxa Nation, these are intended to refer to representatives of each of the four Ktunaxa First Nations in BC and to all Ktunaxa citizens in Canada.

The Project is subject to the IMBA established between Teck (now EVR) and the Ktunaxa Nation, which formalizes the long-standing relationship between the two parties and creates a framework for greater cooperation and clarity on topics including consultation and engagement, environment and land stewardship, cultural resource management, and employment and business opportunities for Ktunaxa citizens and Ktunaxa businesses. The IMBA does not limit or derogate from the Ktunaxa Nation’s rights, including the inherent right of self-government. It provides a process on how mining projects become a part of the IMBA on a case-by-case basis. Additional information related to the interim agreements is provided in Section 1.2.5.

Consistent with the established working relationship and in view of the rights and interests of the Ktunaxa Nation in the Elk Valley, Teck began early engagement with KNC about the Project in 2018, even before the Project was fully scoped. Initial engagement also included Teck’s exploration program. This was followed by an introduction to the Project in fall 2018 and a workshop in April 2019, which included an overview of the Project and engagement on baseline work plans. Ktunaxa Nation Council also provided comments on draft materials prepared by Teck, such as the draft provincial IPD. Concerns about the potential impacts of the Project were raised through ongoing engagement and document reviews. This feedback from KNC on the Project was received and amendments to the Project design and mitigations were applied to both the final IPD and the DPD that was submitted in July 2021.

Following the BC EAO (2023) Readiness Decision Letter in February 2023, Teck engaged KNC and Yaq̓it ʔa·knuqƛi ’it on in a collaborative process for addressing Ktunaxa Nation concerns regarding extraordinarily adverse affects, identifying alternative and preferred options for a Revised DPD, and developing a Revised DPD which KNC and Yaq̓it ʔa·knuqƛi ’it could support advancing through a Readiness Decision.

In January 2023, Teck provided Ktunaxa Nation with letters addressed to Nasuʔkin Pierre, Sam, Louie, Gravelle and Nation Chair Teneese expressing gratitude for having the opportunity to work with each Ktunaxa Nation community and providing a response to the readiness referral package from the BC EAO, notification that 2023 drilling would be suspended, and a commitment to ongoing engagement. In the spring of 2023, Teck and KNC discussed re-engagement on the Project including meetings of the Environmental Working Group meeting on May 29, 2024, and Senior Management Representatives on May 10, 2024. Following these meetings, Teck submitted a request for engagement via letter to KNC on May 10, 2024, including a proposed approach to re-engagement. Following further discussion at the Senior Management Representatives meeting, Teck provided KNC with a Concepts for Engagement Process letter proposing a framework for engagement. In June 2023,

[21] The reserve areas listed sometimes comprise several reserves (e.g., Lower Kootenay 1a, 1B, 1C, 2,3,4 and 5 in Figure 5.1-3). A number of other reserve areas also occur in ʔamakʔis Ktunaxa (e.g., Bummers Flat 6, Isidore’s Ranch 4, Cassimayooks 5, Creston 1).

Teck proposed an agenda for an initial meeting on mine development areas. Teck and KNC subsequently met to refine the details for the meeting that took place on September 22, 2023, in Cranbrook. This was the first of six in-person meetings in a series of workshops.

Consistent with the Readiness Decision, EVR (formerly Teck) has had constructive discussions on key topics such as learning from previous work, considering broader interests, engaging with KNC and Yaq̓it ʔa·knuqƛi ’it, the role of BC and Canada, importance of leadership-level discussions and respecting Yaq̓it ʔa·knuqƛi ’it’s preferred participation. Engagement with leadership, technical staff and community members has provided key insights into what is important to KNC and Yaq̓it ʔa·knuqƛi ’it. Technical-level engagement occurred via a number of small group meetings in support of workshop organization and advancing actions identified through the workshops. Through leadership-to-leadership forums, it has been shared that there is a desire for a more direct working relationship between EVR and the elected Leadership of the Ktunaxa First Nations. Through these leadership-to-leadership relationships, work is underway to collaborate on the future of mining in the Elk Valley and on the FRX assessment. In an effort to formalize these more direct working relationships, interim agreements are being discussed and finalized under the guidance of elected Ktunaxa Leadership and in alignment with the priorities of the respective Ktunaxa Nations. Section 1.2.5 provides a more detailed summary of engagement with KNC and Yaq̓it ʔa·knuqƛi ’it on the Revised DPD.

EVR is committed to continuing to work with the Ktunaxa Nation towards achieving its free, prior and informed consent for the Project.

Table 7.1-1 summarizes engagement activities with the KNC since preparation of the provincial IPD and the Engagement Plan. For earlier engagement activities with the KNC, refer to Table 2 of the Engagement Plan. EVR and KNC acknowledge that the table may not reflect the KNC’s perspective in its entirety and is not a complete account of the issues and concerns raised.

Table 7.1-1: Engagement with Ktunaxa Nation about the Project since Preparation of the Provincial Initial Project Description, April 9, 2020

Date	Activity	Comments	Approach to Addressing
April 9, 2020	Ktunaxa Nation/Teck Existing Conditions Meeting	Teck met with KNC to discuss their comments provided in 2019 on Teck's existing conditions work plans as well as Teck's work plans for 2020. KNC and Yaq̓it ʔa·knuqƛi 'it provided written comments to Teck on the 2020 work plans on May 19, 2020.	Teck continued to work with KNC and Yaq̓it ʔa·knuqƛi 'it to establish Project-specific engagement to address issues and incorporate feedback as needed.
April 22, 2020	Ktunaxa Nation/Teck Valued Component (VC) Meeting	Teck met with KNC and Yaq̓it ʔa·knuqƛi 'it to discuss candidate VCs. Ktunaxa Nation Council and Yaq̓it ʔa·knuqƛi 'it provided feedback on additional species to consider incorporating into the assessment of the Project.	Teck worked to incorporate suggestions from KNC and Yaq̓it ʔa·knuqƛi 'it into their baseline program by meeting with KNC and Yaq̓it ʔa·knuqƛi 'iton October 14, October 19 and November 19 to further discuss candidate VCs. Teck has continued to work on advancing the candidate VCs and selecting those to be included in the baseline assessment.
May 11, 2020	Project Option, Pit Shell Meeting	Teck met with KNC and Yaq̓it ʔa·knuqƛi 'it to share the pit shell options that were considered for the Project, including Option 5.	Ktunaxa Nation Council and Yaq̓it ʔa·knuqƛi 'it highlighted the importance of including Ktunaxa Nation in the decision-making process where possible and engaging early.
May 19, 2020	Ktunaxa Nation Feedback on Baseline Information	Ktunaxa Nation Council and Yaq̓it ʔa·knuqƛi 'it reviewed the 2020 baseline work plans and provided written comments, including recommendations on receptor locations for both Human Health Risk Assessment and sensory assessments.	Teck provided written responses to KNC and Yaq̓it ʔa·knuqƛi 'it on August 4, 2020, and incorporated the recommended sensory receptors into baseline data collection and assessment planning.
May 27, 2020	IMBA Working Group Meeting	Teck met with the IMBA working groups to provide an update on the Project, including economic/employment opportunities associated with the Project.	Teck has continued to work with KNC and Yaq̓it ʔa·knuqƛi 'it to establish Project-specific engagement to address issues and meet Teck-Ktunaxa Nation IMBA commitments.
June 4, 2020	Technical Advisor Meeting	Teck met with KNC and Yaq̓it ʔa·knuqƛi 'it and BC EAO in the Introductory Technical Advisor Meeting to introduce the Technical Advisory Committee process under the BC EAA.	No Project-specific concerns were brought forward in the meeting. Teck continued collaborating with the KNC and Yaq̓it ʔa·knuqƛi 'it on the early engagement tracking table to coordinate on which comments to address in the DPD report.
June 5, 2020	Ktunaxa Nation Letter to BC EAO	Ktunaxa Nation Council and Yaq̓it ʔa·knuqƛi 'it provided Ktunaxa Nation's notice of intent to participate in the BC EAA assessment.	Teck has continued to work with KNC and Yaq̓it ʔa·knuqƛi 'it to establish Project-specific engagement to address issues and meet Teck-Ktunaxa Nation IMBA commitments.
June 19, 2020	Project Option, Tailings Meeting	Teck met with KNC and Yaq̓it ʔa·knuqƛi 'it to discuss preliminary tailings options to consider for the Project. Ktunaxa Nation indicated they would like to know more about the Swift Mine Plan and would like to see Teck's internal criteria rankings.	Teck, KNC, and Yaq̓it ʔa·knuqƛi 'it met on October 29 (listed below) to discuss the Swift Mine Plan.
June 23, 2020	Letter from Ktunaxa Nation to IAAC	Letter requesting the Project be federally designated under IAAC.	Teck acknowledged the federal designation decision that occurred on August 19, 2020, as well as the Ktunaxa Nation's interests in the Project.
July 6, 2020	Project Option, Mine Rock Placement Meeting	Teck met with KNC and Yaq̓it ʔa·knuqƛi 'it to discuss proposed plans for mine rock placement. Ktunaxa indicated they would be interested in seeing the second case (accounting for environmental factors) when it is ready.	Teck presented options at the July 7, 2020, meeting (see below). Mine rock placement was adjusted to optimize in-pit placement as much as possible.
July 7, 2020	Waste Rock Placement Meeting	Teck held a meeting with KNC and Yaq̓it ʔa·knuqƛi 'it and BC EAO to discuss waste rock placement options for the Project.	Teck presented (by video) the options being considered for waste rock placement and described the selected options. Teck also presented on water management and castover (fly rock) considerations as they pertain to waste rock management.
July 22, 2020	Ktunaxa Nation Letter to BC EAO on the Provincial IPD	Ktunaxa Nation Council and Yaq̓it ʔa·knuqƛi 'it provided written comments following their review of the provincial IPD outlining concerns relating to the Project and providing recommendations for conducting the assessment pertaining to Ktunaxa Nation's interests.	Teck considered the comments on the provincial IPD and provided written responses to the comments, indicating how the information provided either informed the development of the later DPD or how the comments were proposed to be addressed in later stages of Project assessment.
August 12, 2020	Ktunaxa Nation Open House #1	Teck and the BC EAO presented to KNC, Yaq̓it ʔa·knuqƛi 'it, and Ktunaxa Nation citizens in an open house. Questions and comments arose relating to food security, closure timelines and the Readiness Decision under the BC EAA process. Ktunaxa citizens expressed concern regarding the participation of other Indigenous nations in the Project assessment process.	Teck has included food security in the FRX Comment Tracking Table. The BC EAO provided some feedback around the Readiness Decision.
August 13, 2020	Ktunaxa Nation Open House #2	Teck and the BC EAO presented to KNC, Yaq̓it ʔa·knuqƛi 'it, and Ktunaxa Nation citizens in an open house. Questions arose regarding reclamation timelines, closure timelines and the Readiness Decision under the BC EAA process. Ktunaxa Nation citizens expressed concern regarding the participation of other Indigenous nations in the Project assessment process.	Teck has included reclamation progress in the FRX Comment Tracking Table. The BC EAO provided some feedback around the Readiness Decision. Teck continued discussions with the Ktunaxa Nation on the participation of other Indigenous nations in the assessment process including the January 20, 2021 (see below) email regarding other Indigenous nations.

Table 7.1-1: Engagement with Ktunaxa Nation about the Project since Preparation of the Provincial Initial Project Description, April 9, 2020

Date	Activity	Comments	Approach to Addressing
August 14, 2020	Letter from Ktunaxa Nation to IAAC	Ktunaxa Nation Council and Yaq̓it ʔa·knuqƛi ’it provided written comments re-affirming their request that the Project be federally designated under IAAC.	Teck acknowledged the federal designation decision on August 19 as well as the Ktunaxa Nation’s interests in the Project.
August 24–25, 2020	Ktunaxa Nation Site Visit	Ktunaxa Nation knowledge holders, KNC and Yaq̓it ʔa·knuqƛi ’it participated in a two-day site visit to the Project location to support the Indigenous Interests Assessment for the Project.	Teck has continued to work with the Ktunaxa Nation to share information to support the Ktunaxa Nation Indigenous Interests Assessment for the Project.
September 18, 2020	Ktunaxa Nation’s Environmental Assessment Process Workshop	Ktunaxa Nation Council and Yaq̓it ʔa·knuqƛi ’it hosted a workshop with Teck on Ktunaxa Nation’s environmental assessment process.	Teck has continued to work with KNC and Yaq̓it ʔa·knuqƛi ’it to share information to support the Ktunaxa Nation Indigenous Interests Assessment for the Project.
October 14, 2020	VC Workshop, Aquatic and Physical	Teck met with KNC and Yaq̓it ʔa·knuqƛi ’it to discuss candidate aquatic and physical VCs.	Teck continued to work with the KNC and Yaq̓it ʔa·knuqƛi ’it on topics of interest identified through the aquatic and physical candidate VCs discussion.
October 19, 2020	VC Workshop, Terrestrial and Physical	Teck met with KNC and Yaq̓it ʔa·knuqƛi ’it to discuss terrestrial and physical VCs.	Teck continued to work with the KNC and Yaq̓it ʔa·knuqƛi ’it on topics of interest identified in the workshop, including terrestrial and physical candidate VCs. Teck, KNC and Yaq̓it ʔa·knuqƛi ’it aligned on a path forward for tracking comments, including the importance of an approach through which KNC and Yaq̓it ʔa·knuqƛi ’it could comment on the rationale for the VCs.
October 28, 2020	Ktunaxa Nation and Teck Collaborative Engagement Planning Session	Teck met with KNC and Yaq̓it ʔa·knuqƛi ’it to discuss engagement needs associated with the Project.	Collaborative engagement planning between Teck, KNC, and Yaq̓it ʔa·knuqƛi ’it is ongoing, including aligning scheduling and information needs for both parties within the BC and federal regulatory processes.
October 29, 2020	Swift Mine Plan Discussion	Teck met with KNC and Yaq̓it ʔa·knuqƛi ’it to discuss the Swift Mine Plan and its interaction with the Project. Ktunaxa Nation indicated appreciation for the meeting.	Teck has continued to engage with KNC and Yaq̓it ʔa·knuqƛi ’it on the business need for the Project as part of FRO mine life.
November 4, 2020	Letter from Ktunaxa Nation to IAAC	Letter providing feedback on the federal IPD.	Teck acknowledged the feedback provided and has continued to work to engage with KNC and Yaq̓it ʔa·knuqƛi ’it on their interests and concerns regarding the Project.
November 9, 2020	VC Workshop, Cultural and Social	Teck met with KNC and Yaq̓it ʔa·knuqƛi ’it to discuss cultural, social and human health candidate VCs.	Teck continued to work with KNC and Yaq̓it ʔa·knuqƛi ’it on topics of interest identified through the cultural, social and human health candidate VCs discussion and implement the feedback provided by KNC and Yaq̓it ʔa·knuqƛi ’it.
November 17, 2020	Ktunaxa Nation Input into the Detailed Project Description	Ktunaxa Nation Council and Yaq̓it ʔa·knuqƛi ’it provided Teck with material reflecting elements of Ktunaxa Nation’s perspectives and voice for inclusion in the DPD. The first document provided specific feedback on sections of the DPD including early engagement, Project location, Project benefits, pit shell, tailings, Indigenous Peoples engagement, interests, and location, social and economic conditions, land use plan and Project–environmental interactions. The second document incorporated the Ktunaxa voice in the Ktunaxa Interests and Locations piece.	Teck appreciates the effort the KNC and Yaq̓it ʔa·knuqƛi ’it has put into developing their contribution to the DPD and has included it within this DPD. Teck has continued to work with KNC and Yaq̓it ʔa·knuqƛi ’it so that the Ktunaxa Nation’s perspectives are reflected in the assessment being undertaken for the Project.
December 16, 2020	Letter from Ktunaxa Nation to Teck regarding the Provincial Readiness Decision	Ktunaxa Nation Council and Yaq̓it ʔa·knuqƛi ’it provided Teck with a letter outlining interests and concerns regarding the provincial Readiness Decision.	Teck acknowledged the feedback provided and is actively working on a number of the topics raised by KNC and Yaq̓it ʔa·knuqƛi ’it. Teck provided a response to this letter on February 16, 2021, to the Ktunaxa Nation outlining a proposed approach, and has continued to work with the KNC and Yaq̓it ʔa·knuqƛi ’it on their interests and concerns regarding the Project.
December 17, 2020	Ktunaxa Nation/Teck Meeting on Project Alternatives	Teck held Environmental Working Group meeting with KNC to discuss Project alternatives, the DPD, and the Readiness memo.	Teck acknowledged the feedback KNC and Yaq̓it ʔa·knuqƛi ’it has provided on this topic and have worked to provide the level of detail requested in the DPD through topic specific engagements. For example, on January 28, 2021 (see below), Teck held meeting to address impacts to Chauncey as a critical WCT habitat.
January 6, 2021	Name Change Notification	Teck notified KNC and Yaq̓it ʔa·knuqƛi ’it of the Project name change via email and phone calls (where possible).	No further engagement on the Project name change was required.
January 14, 2021	Meeting with Ktunaxa Nation to Discuss Readiness Decision Information	Teck met with KNC and Yaq̓it ʔa·knuqƛi ’it to clarify the interests and concerns in the December 16 letter.	Teck acknowledged the feedback provided and is actively working on a number of the topics raised with the KNC and Yaq̓it ʔa·knuqƛi ’it.

Table 7.1-1: Engagement with Ktunaxa Nation about the Project since Preparation of the Provincial Initial Project Description, April 9, 2020

Date	Activity	Comments	Approach to Addressing
January 20, 2021	Email Regarding Other Indigenous Nations	Teck provided KNC and Yaq̓it ʔa·knuqƛi ’it a package of publicly available information submitted by other potentially affected Indigenous Peoples related to the Project.	Teck is committed to ongoing engagement on this topic.
January 28, 2021	Chauncey Discussion	Teck met with KNC and Yaq̓it ʔa·knuqƛi ’it and to discuss Project interactions with Chauncey (Chauncey Creek - subject to potential disturbance because of castover and fly rock into Chauncey Creek drainage).	Teck is committed to working on a Chauncey Management Plan with KNC and Yaq̓it ʔa·knuqƛi ’it in the DPD and will work with KNC and Yaq̓it ʔa·knuqƛi ’it on drafting this document through the assessment phase.
February 16, 2021	Letter Response to Ktunaxa Nation from Teck regarding the Readiness Decision	Teck provided KNC and Yaq̓it ʔa·knuqƛi ’it with a letter response to the KNC and Yaq̓it ʔa·knuqƛi ’it December 16, 2021, environmental assessment Readiness Decision Letter outlining topics of interest and concern regarding the Readiness Decision.	Teck is actively working on a number of the topics raised by KNC and Yaq̓it ʔa·knuqƛi ’it in their letter through technical and leadership engagement that is described in detail in Sections 3.2 and 7.1.2.
March 2, 2021	Draft DPD Comments	Ktunaxa Nation Council and Yaq̓it ʔa·knuqƛi ’it provided draft comments on the draft DPD to Teck.	Teck appreciates the effort KNC and Yaq̓it ʔa·knuqƛi ’it has put into developing the DPD comments. Teck worked to address the comments in the final version of the DPD and/or to indicate where comments may be addressed later in the regulatory process, or outside of the regulatory process, as documented in comment tracking database.
March 3, 2021	Letter from Ktunaxa Nation	Ktunaxa Nation Council and Yaq̓it ʔa·knuqƛi ’it provided a letter expressing concerns with environmental impacts and requested the DPD submission be suspended pending further understanding of existing impacts and progress on key mitigations. Ktunaxa Nation Council and Yaq̓it ʔa·knuqƛi ’it also requested engagement with Teck leadership.	Teck provided a letter on March 14, 2021 (see below row) in response to the March 3, 2021, letter from KNC and Yaq̓it ʔa·knuqƛi ’it. Teck is committed to engagement with the KNC and Yaq̓it ʔa·knuqƛi ’it on concerns about significant environmental impacts and land stewardship.
March 15, 2021	Teck Response to Ktunaxa Nation’s March 3 Letter	Teck provided a letter to KNC and Yaq̓it ʔa·knuqƛi ’it committing to ongoing engagement on the Project, including DPD comments.	Teck is committed to ongoing engagement with the Ktunaxa Nation, including at the leadership level.
March 18, 2021	Ktunaxa Nation Standards for Determining Significance in EA	Ktunaxa Nation Council and Yaq̓it ʔa·knuqƛi ’it provided Teck with a Draft Technical memorandum that outlined minimum KNC standards and guidance for proponents who are asked to determine the significance of effects in environmental assessment. The memo was in response to Teck's March 17, 2020, request for the Water Framework.	Teck is committed to ongoing engagement with the KNC and Yaq̓it ʔa·knuqƛi ’it in the assessment phase to incorporate KNCs standards and guidance on the determination of significance of effects.
March 18, 2021	Cultural Awareness Session	Ktunaxa Nation Council and Yaq̓it ʔa·knuqƛi ’it led a Cultural Awareness Session for FRX team members.	Teck and the FRX team appreciate the KNC and Yaq̓it ʔa·knuqƛi ’it taking the time to lead a Cultural Awareness Session. The session was impactful for team members.
April 26, 2021	Ktunaxa Nation Engagement Pause Notification	Ktunaxa Nation Council and Yaq̓it ʔa·knuqƛi ’it informed Teck that external engagement would be paused.	Teck acknowledged the pause in external engagement.
June 3, 2021	Engagement Letter	Teck provided a letter updating KNC and Yaq̓it ʔa·knuqƛi ’it to on the Project and confirming next steps for engagement.	Teck is committed to ongoing engagement with the KNC and Yaq̓it ʔa·knuqƛi ’it on the Project.
June 9, 2021	Engagement Letter	Teck updated the June 3, 2021, re-engagement letter and provided KNC and Yaq̓it ʔa·knuqƛi ’it with an updated draft highlighting the principles of a consent-based approach for engagement.	Teck is committed to ongoing engagement with the KNC and Yaq̓it ʔa·knuqƛi ’it on the Project.
June 28, 2021	Letter to Ktunaxa Nation Regarding Submission of the DPD	Teck provided a letter identifying Teck’s intent to submit the DPD on July 31 and expressed Teck’s commitment to continued engagement on the Project. The letter emphasized that submitting the DPD presented an opportunity for further collaboration on Project assessment, execution and mitigation measures for identified impacts.	Teck proposed ongoing engagement on the Project continue at the KNC and Yaq̓it ʔa·knuqƛi ’it’s earliest opportunity. It stated that many of the Ktunaxa's concerns were addressed in the DPD. Teck reiterated its commitment to incorporating KNC and Yaq̓it ʔa·knuqƛi ’it 's feedback throughout the assessment process and expressed openness to discussing Project changes to address concerns.
July 29, 2021	Teck Informed Ktunaxa Nation of DPD Submission	Teck provided KNC and Yaq̓it ʔa·knuqƛi ’it with a letter informing Ktunaxa Nation of the DPD submission, including the attempt to address many Ktunaxa concerns.	Teck expressed its commitment to continue to collaborate and incorporate feedback on the Project assessment and mitigation measures for identified impacts.
August 11, 2021	Technical Advisors Meeting for the Readiness Decision Phase	Tek met with technical advisors, including KNC and Yaq̓it ʔa·knuqƛi ’it, to discuss the Readiness Decision Phase. The agenda included an FRX Project overview, Project Q&A, coordinated assessment process, assessment process Q&A, closing and next steps.	Teck expressed its commitment to continued engagement with communities and potentially affected Indigenous Peoples as the assessment moves forward in accordance with the requirements for engagement set by IAAC and BC EAO.
August 13, 2021	Letter from Ktunaxa Nation to BC EAO	Teck received a copy of the KNC and Yaq̓it ʔa·knuqƛi ’it letter to BC EAO requesting a suspension of steelmaking coal mine environmental assessments in the Elk Valley.	Teck remains committed to working with KNC and Yaq̓it ʔa·knuqƛi ’it on this Project and other regional stewardship initiatives, for example, the joint management of conservation lands in the Elk Valley.

Table 7.1-1: Engagement with Ktunaxa Nation about the Project since Preparation of the Provincial Initial Project Description, April 9, 2020

Date	Activity	Comments	Approach to Addressing
September 15, 2021	Authorization for Exploration Activities	Teck met with KNC, FLNRORD and BC EMLI to discuss the recent authorization for exploration activities.	Teck is committed to further engagement with KNC and Yaq̓it ʔa·knuqƛi ’it on the Project and is working to advance identified action items, including sharing projected dates for reclamation activities at FRX and plans for further research and collaboration with KNC and Yaq̓it ʔa·knuqƛi ’it. Subsequent meetings related to exploration activities at FRX took place through the Annual Summary of Exploration Activities meetings with BC EMLI and KNC, in addition to updates provided through routine engagement.
March 1, 2022	Annual Multi-Year Area Based (MYAB) Update Meeting	Teck met with BC EMLI, KNC, and Yaq̓it ʔa·knuqƛi ’it for the MYAB annual update meeting to discuss completed exploration work in 2020 and 2021 and the proposed scope for 2022.	Teck is committed to further engagement with KNC and Yaq̓it ʔa·knuqƛi ’it on the Project and will work to advance identified action items.
April 7, 2022	Ktunaxa Nation Letter on the MYAB Update	The BC EMLI provided Teck with the April 1, 2022, letter from KNC on the MYAB update, which included revisions on revised plans submitted by Teck in 2021 and 2022, including the FRX 2022 Work Plan Update Revision, Grasslands Reclamation Plan 2022, FRX Project Road Deactivation & Reclamation Plan 2021, Invasive Plant Efficacy Monitoring Program Report: Road Rehabilitation 2021, Road Rehabilitation Invasive Plant Survey and Treatment Final Report 2021.	Teck reviewed the letter and communicated to BC EMLI, KNC, and Yaq̓it ʔa·knuqƛi ’it that they would respond with further questions and comments as needed.
April 7, 2022	Teck Letter to Ktunaxa Nation	Teck provided a letter to KNC and Yaq̓it ʔa·knuqƛi ’it to provide an update on issues raised in their December 16, 2020, letter response to the DPD submission.	Teck acknowledged the concerns expressed by the KNC and Yaq̓it ʔa·knuqƛi ’it on the FRX Project and reaffirmed their commitment to working collaboratively and in good faith to address those issues and concerns. Teck addressed several information needs from the letter in the DPD including the purpose of the Project, need for the Project, Project scope, compliance at Fording River and Indigenous Peoples Engagement. The letter also provided a commitment to design criteria that uses all technically and economically feasible means to avoid impacts to Chauncey Creek. Other information needs were addressed outside of the DPD and included the following topics: high elevation grasslands, compliance and improvement plants, water quality mitigation effectiveness, upper Fording River WCT, the Tributary Management Plan (TMP), cumulative effects, human and ecological health, pace of reclamation and bonding.
April 8, 2022	Letter from Ktunaxa Nation to BC EAO	Teck received a copy of the KNC and Yaq̓it ʔa·knuqƛi ’it letter to BC EAO initiating the dispute resolution process.	Teck worked with the BC EAO and KNC and Yaq̓it ʔa·knuqƛi ’it as requested throughout the dispute resolution process for example supporting logistics for a field visit on August 25, 2022.
April 21, 2022	BC EMLI Comments on the Ktunaxa Nation MYAB Feedback Document	The BC EMLI provided Teck with comments following the KNC and Yaq̓it ʔa·knuqƛi ’it MYAB feedback document that was sent to Teck on April 7, 2022. Teck was informed that resolution of the issues was not critical in informing BC EMLI's review of the Notification of Departure but indicated that the comments would be helpful in the development and consideration of work for reclamation plans on Castle Mountain and in high elevation grasslands in general.	Teck remains committed to addressing BC EMLI (now BC MCM) feedback and continuing discussion through annual meetings.
July 21, 2022	Ktunaxa Nation Teck Dispute Resolution Land Meetings Logistics	Ktunaxa Nation Council and Yaq̓it ʔa·knuqƛi ’it requested a meeting on the land with BC EAO (with support from Teck) at the proposed FRX site with the CEAO and the BC EAO project team on August 25, 2022.	Teck responded to the KNC and Yaq̓it ʔa·knuqƛi ’it’s July 21, 2022, request for a KNC and Yaq̓it ʔa·knuqƛi ’it and BC EAO meeting on the land and offered logistical support to facilitate the site visit (see below). Teck remains committed to supporting logistics for engagement with the KNC and Yaq̓it ʔa·knuqƛi ’it.
July 22, 2022	Teck/Ktunaxa Nation Dispute Resolution Land Meetings Logistics	Teck responded to the KNC and Yaq̓it ʔa·knuqƛi ’it’s request for an August 25, 2022, Ktunaxa Nation, BC EAO meeting on the land. Teck offered logistical support.	Teck expressed its commitment to continued engagement with the KNC and Yaq̓it ʔa·knuqƛi ’it and provided support for facilitating the site visit.
July 26, 2022	Teck/Ktunaxa Nation Dispute Resolution Land Meetings Logistics	Ktunaxa Nation Council and Yaq̓it ʔa·knuqƛi ’it informed Teck and BC EAO that details for the August 25, 2022, dispute resolution meeting on the land were under development.	Teck expressed its commitment to continued engagement with the KNC and Yaq̓it ʔa·knuqƛi ’it and provided support for facilitating the site visit, including travel options.
August 17, 2022	Ktunaxa Nation/Teck Dispute Resolution Land Meeting Logistics	Ktunaxa Nation Council and Yaq̓it ʔa·knuqƛi ’it followed up with Teck on the details of the meeting on the land on August 25, 2022, with the BC EAO, KNC, and Yaq̓it ʔa·knuqƛi ’it.	Teck finalized the logistics of the on the land visit on August 18. The on the land visit with the KNC and Yaq̓it ʔa·knuqƛi ’it was completed on August 24–25, 2022.

Table 7.1-1: Engagement with Ktunaxa Nation about the Project since Preparation of the Provincial Initial Project Description, April 9, 2020

Date	Activity	Comments	Approach to Addressing
August 18, 2022	Ktunaxa Nation/Teck/BC EAO Letter on Concerns Related to the Readiness Referral Decision Process	Teck provided BC EAO, KNC, and Yaq̓it ʔa·knuqƛi ’it with a letter outlining Teck’s concerns relating to the Readiness Referral and Decision process for the Project. The letter was in response to the August 10, 2022, discussion that was had with BC EAO regarding the process that would lead to a Readiness Decision on the FRX Project by the CEAO. The letter included Teck's comments and concerns on the process of reaching the decision.	In the letter, Teck informed BC EAO, KNC, and Yaq̓it ʔa·knuqƛi ’it that they would need additional time to respond to the materials they had received and listed those materials that Teck had not received. Teck has worked to provide responses to the concerns raised by the Ktunaxa Nation and integrate them into this DPD.
August 18, 2022	Dispute Resolution Meeting on the Land Logistics	Teck provided KNC with additional information for the August 25, 2022 on the land meeting. Teck provided details for the helicopter tour and for plan B ground support.	Teck continues to work with the KNC and Yaq̓it ʔa·knuqƛi ’it on this Project, including facilitating logistics for site visits and offered the opportunity to participate in the sessions.
October 20, 2022	Summary of Meeting on the Land	The BC EAO provided Teck with a report produced by the KNC and Yaq̓it ʔa·knuqƛi ’it and reviewed by the BC EAO that summarized the August 24–25, 2022, meetings on the land that included the BC EAO, KNC, and Yaq̓it ʔa·knuqƛi ’it.	Teck will continue to work with KNC and Yaq̓it ʔa·knuqƛi ’it to address Ktunaxa concerns. The content of this report was used in part to facilitate the April 8 and 9, 2024, Mine Development Workshop discussion on “closing the gap” (see below).
January 20, 2023	Ktunaxa Nation/Teck Leadership Letter	Teck provided KNC and Yaq̓it ʔa·knuqƛi ’it with letters addressed to Nasuʔkin Pierre, Sam, Louie, Gravelle and Nation Chair Teneese expressing gratitude for having the opportunity to work with each Ktunaxa Nation community and providing a response to the readiness referral package from the BC EAO, notification that 2023 drilling would be suspended, and a commitment to ongoing engagement.	Teck will continue to engage with KNC and Yaq̓it ʔa·knuqƛi ’it on the FRX assessment.
February 21, 2023	BC EAO Readiness Decision Letter	The BC EAO provided Teck with a Readiness Decision Letter informing Teck that a Revised DPD would be required before Teck would proceed through the environmental assessment process for FRX.	Teck acknowledged the revisions it needed to undertake to fulfill the requirements of the DPD. Details of Teck’s response to the Readiness Decision are outlined in Sections 1.2.5, 3.0 and 4.0.
March 29, 2023	Ktunaxa Nation/Teck Meeting	Teck met with KNC and Yaq̓it ʔa·knuqƛi ’it and shared ideas on the re-engagement process at an Environmental Working Group meeting.	Teck followed up with KNC and Yaq̓it ʔa·knuqƛi ’it on April 17, 2023, with high-level thoughts on an approach for engagement (see below) with a focus on a collaborative and inclusive dialogue.
April 17, 2023	Ktunaxa Nation/Teck Meeting	Teck provided KNC and Yaq̓it ʔa·knuqƛi ’it, by email, with a draft approach for re-engagement with a focus on collaborative and inclusive dialogue through the Environmental Working Group.	Teck will be submitting a letter to the CEAO in response to the environmental assessment Readiness Decision to re-affirm concerns about the reasons given by the CEAO for the decision.
May 3, 2023	Ktunaxa Nation/BC EMLI/Teck Meeting	Teck presented the 2022 Annual Summary of Exploration Activities and discussed the 2023 drilling suspension and planned activities in the Annual Update Meeting with BC EMLI, KNC, and Yaq̓it ʔa·knuqƛi ’it.	Teck prepared and shared meeting notes on May 8, 2024. Teck, in response to KNC comments, committed to providing KNC and Yaq̓it ʔa·knuqƛi ’it with updates to the Regional Road Rehabilitation Program and wildlife monitoring camera data used to manage heli-drilling impacts as well as sharing the FRX Exploration and Care Maintenance Plan.
May 3, 2023	KNC Chair Letter	Teck provided KNC and Yaq̓it ʔa·knuqƛi ’it with the January 20, 2023, letter sent to the KNC Chair.	Teck stated in the January 20, 2023, letter its commitment to engaging with KNC and Yaq̓it ʔa·knuqƛi ’itopenly and in good faith to develop shared plans that inspire trust and confidence in their stewardship management. Teck shared it welcomes full and open government-to-government dialogue and direction to continue engaging with KNC and Yaq̓it ʔa·knuqƛi ’it to revise the Project in a manner that addresses Ktunaxa interests and concerns.
May 10, 2023	Request for Engagement Letter	Teck provided KNC and Yaq̓it ʔa·knuqƛi ’it with a draft Request for Engagement letter with a proposed approach to re-engagement. The letter included key principles for engagement and a draft FRX Project Engagement Framework.	Teck proposed a full day workshop to collaboratively develop a FRX Re-engagement Plan.
June 7, 2023	Ktunaxa Nation/Teck Meeting	Teck met with KNC and Yaq̓it ʔa·knuqƛi ’it at the Senior Management Representatives meeting to share ideas on the re-engagement process and discuss feedback on the May 10, 2023, letter.	Teck has continued to engage with the KNC and Yaq̓it ʔa·knuqƛi ’it on the recommendations from the Readiness Decision.
June 9, 2023	Concepts for Engagement Process Letter	Teck provided KNC and Yaq̓it ʔa·knuqƛi ’it with an update on the Re-Engagement letter.	Teck shared an updated and final version of the draft Re-Engagement Letter based on feedback received from the KNC and Yaq̓it ʔa·knuqƛi ’it on May 10, 2023.
July 26, 2023	Mine Development Areas Agenda	Teck provided KNC and Yaq̓it ʔa·knuqƛi ’it a draft agenda for an initial meeting on mine development areas.	Teck continued to work collaboratively with KNC and Yaq̓it ʔa·knuqƛi ’it on the planning of the mine development area meetings including discussing the agenda at the July 27, 2023, Environmental Working Group Meeting.

Table 7.1-1: Engagement with Ktunaxa Nation about the Project since Preparation of the Provincial Initial Project Description, April 9, 2020

Date	Activity	Comments	Approach to Addressing
July 27, 2023	Mine Development Options Discussion	Teck met KNC and Yaq̓it ʔa·knuqƛi ’it to discuss the meeting agenda for an initial meeting on mine development areas at the Environmental Working Group meeting.	Teck has continued to work collaboratively with KNC and Yaq̓it ʔa·knuqƛi ’it to plan ongoing engagement.
August 3, 2023	Regulatory Engagement Coordinator Contact	Ktunaxa Nation Council and Yaq̓it ʔa·knuqƛi ’it provided an email to Teck including contact information for their Regulatory Engagement Coordinator and indicated that feedback on the proposed mine development meeting would be provided.	Teck will continue to work directly with the Regulatory Engagement Coordinator to advance engagement on the FRX Project.
August 16, 2023	Mine Development Areas Agenda	Ktunaxa Nation Council and Yaq̓it ʔa·knuqƛi ’it provided an email with comments on the proposed mine development meeting agenda and process.	Teck continued to work collaboratively with KNC and Yaq̓it ʔa·knuqƛi ’it to plan the mine development meeting. Some of the changes applied by Teck included a longer session, discussion of successes and challenges and including Land Managers from each member nation (Teck sent invitations on August 31, 2023, and September 1, 2023).
August 17, 2023	Mine Development Areas Agenda	Teck, KNC, and Yaq̓it ʔa·knuqƛi ’it shared ideas on a suggested first meeting agenda for the Environmental Working Group.	Teck worked with KNC and Yaq̓it ʔa·knuqƛi ’it to refine details of the agenda at the August 23, 2023, meeting (see below).
August 23, 2023	Mine Development Areas Engagement Discussion	Teck met with KNC and Yaq̓it ʔa·knuqƛi ’it to refine the details for the upcoming mine development engagement.	Teck has continued to work collaboratively with KNC and Yaq̓it ʔa·knuqƛi ’it to plan ongoing engagement.
August 31, 2023	Mine Development Areas Meeting	Teck sent invitations to Member Nations (Yaq̓it ʔa·knuqƛi ’it) for the September 22, 2023, mine development meeting with KNC.	Teck has continued to work collaboratively with KNC and Yaq̓it ʔa·knuqƛi ’it to plan ongoing engagement.
September 1, 2023	Mine Development Areas Meeting	Teck sent invitations to Member Nations (yaqan nuʔkiy, Akisqnuk, Aq’am) for the September 22, 2023, mine development meeting with KNC.	Teck has continued to work collaboratively with KNC and Yaq̓it ʔa·knuqƛi ’it to plan ongoing engagement.
September 6, 2023	Alternatives Project Workshop Planning Discussion	Teck met with KNC and Yaq̓it ʔa·knuqƛi ’it and discussed the process and approach for the upcoming September 22 workshop at the Environmental Working Group meeting.	Teck developed meeting materials for the September workshop including a map of potential mine development areas.
September 14, 2023	Mine Development Engagement Meeting	Teck met with KNC and Yaq̓it ʔa·knuqƛi ’it to discuss mine development engagement and the BC EAO Readiness report recommendations.	Teck, KNC, and Yaq̓it ʔa·knuqƛi ’it confirmed the approach to the September workshop.
September 21, 2023	Site Tour	Teck provided site tour for KNC, Yaq̓it ʔa·knuqƛi ’it, IAAC and BC EAO, which included discussion on future mine development and FRX.	Teck is committed to working with the KNC and Yaq̓it ʔa·knuqƛi ’it to support various engagement activities including site visits.
September 22, 2023	Alternatives Project Workshop	Teck met with KNC and Yaq̓it ʔa·knuqƛi ’it for an all-day workshop to collaborate on the approach to ongoing Project engagement and alternatives to the Project. Invitees included Land Managers from each Ktunaxa First Nation.	Teck acknowledged the Ktunaxa Nation perspectives on Project alternatives and ongoing Project engagement. Teck created and shared a meeting summary, including discussion points on the potential impact on cultural mitigations focused on social outcomes and consent-based agreement on the Project.
October 6, 2023	Ktunaxa Nation/Teck Meeting	Teck, KNC, and Yaq̓it ʔa·knuqƛi ’it met to debrief the large group meeting on September 22, 2023.	Teck, KNC, and Yaq̓it ʔa·knuqƛi ’it determined that a subsequent workshop would be planned. The second workshop, focused on alternatives to the Project took place on November 15, 2023.
October 17, 2023	Ktunaxa Nation/Teck Meeting	Teck met with KNC and Yaq̓it ʔa·knuqƛi ’it and discussed mine development and upcoming schedules and agendas at the Environmental Working Group.	Teck continued to work collaboratively with KNC and Yaq̓it ʔa·knuqƛi ’it to plan ongoing engagement.
October 23, 2023	Ktunaxa Nation/Teck Meeting Request	Ktunaxa Nation Council and Yaq̓it ʔa·knuqƛi ’it requested a meeting with Teck to discuss access to the Castle Mountain area as the Ktunaxa Nation planned to investigate traditional trails in the area in early November 2023.	Teck has continued to support the Ktunaxa Nation with access requests for Castle Mountain. Teck provided KNC and Yaq̓it ʔa·knuqƛi ’it with options to have a meeting and discuss the Ktunaxa Nation’s Castle Mountain access during early November 2023.
October 31, 2023	Castle Mountain Area Map	Teck provided KNC and Yaq̓it ʔa·knuqƛi ’it with a map and information on accessing the Castle Mountain area.	Teck remains committed to supporting logistics for engagement with KNC and Yaq̓it ʔa·knuqƛi ’it.
October 31, 2023	Castle Mountain Area Map	Ktunaxa Nation Council and Yaq̓it ʔa·knuqƛi ’it informed Teck the proposed work would be planned for 2024 due to winter conditions.	Teck will support access to this area when KNC and Yaq̓it ʔa·knuqƛi ’it would like to complete their work.
October 31, 2023	Notice of Work Application Letter	Teck provided KNC and Yaq̓it ʔa·knuqƛi ’it a letter with information regarding an upcoming Notice of Work application for exploration activities planned in 2024. Teck indicated that it is planning to submit a Notice of Work application for an annual authorization to conduct exploration drilling and groundwater monitoring in 2024.	Teck acknowledged that work is underway to engage on the recommendations of the Readiness Decision and that exploration work on the Project is being completed in parallel to support data needs.
November 2, 2023	Ktunaxa Nation/Teck Meeting	Teck, KNC, and Yaq̓it ʔa·knuqƛi ’it met to discuss the agenda and topics for the November 15, 2023, workshop.	Teck provided KNC and Yaq̓it ʔa·knuqƛi ’it with the November 15, 2023, mine development areas meeting draft agenda and invited feedback. Teck also provided KNC and Yaq̓it ʔa·knuqƛi ’it with the September 22, 2023, mine development areas meeting group notes.

Table 7.1-1: Engagement with Ktunaxa Nation about the Project since Preparation of the Provincial Initial Project Description, April 9, 2020

Date	Activity	Comments	Approach to Addressing
November 15, 2023	Ktunaxa Nation/Yaq̓it ʔa·knuqƛi ’it / Teck Workshop	Teck met with KNC and Yaq̓it ʔa·knuqƛi ’it for an all-day workshop to discuss alternatives to the Project and ongoing Project engagement. Invitees included Land Managers from each Ktunaxa First Nation. Ktunaxa Nation Council and Yaq̓it ʔa·knuqƛi ’it requested internal conversations in preparation for Glencore leadership meetings.	Teck acknowledged KNC and Yaq̓it ʔa·knuqƛi ’it’s request to have internal conversations with KNC and Yaq̓it ʔa·knuqƛi ’it in preparation for Glencore leadership meetings recognizing the importance for future engagement and relationship-building. Teck also acknowledged KNC and Yaq̓it ʔa·knuqƛi ’it’s comments including adding “Ktunaxa sovereignty and rights” to the engagement principles and providing more detail on GHO and FRO production assumptions and rationale on determination of “economic vs. uneconomic” areas of permitted remaining reserves.
November 15, 2023	Presentation Slides	Teck provided KNC, Yaq̓it ʔa·knuqƛi ’it, ʔakisq̓nuk, ʔaq̓am, and yaqan nuʔkiy with the November 15, 2023, presentation slides.	Teck provided the presentation slides with key updates for engagement going forward (for both Teck, KNC, and Yaq̓it ʔa·knuqƛi ’it), permitting needs to sustain operation, the mine development area table and criteria, Ktunaxa Nation criteria, existing conditions and commitments.
November 16, 2023	Ktunaxa Nation/Teck Meeting	Teck met with KNC and Yaq̓it ʔa·knuqƛi ’it following the November 15, 2023, meeting to discuss next steps. Teck offered to write a first draft of a memorandum/briefing note to jointly request a mandate from Ktunaxa Nation leadership to assess mine development.	Teck will continue to work collaboratively with KNC and Yaq̓it ʔa·knuqƛi ’it to support development of a deliverable that can inform leadership decision making.
November 21, 2023	Draft Memo	Teck advised KNC and Yaq̓it ʔa·knuqƛi ’it that the draft memo/briefing note was being discussed internally.	
December 7, 2023	Update on Draft Memo	Ktunaxa Nation Council and Yaq̓it ʔa·knuqƛi ’it requested an update from Teck on the status of the draft memo (action item from November 16 meeting).	Teck responded to the December 7 email, advising that useful internal meetings had happened and more information would be shared during a call on December 13, 2023.
December 13, 2023	Ktunaxa Nation/Teck Meeting	Teck met with KNC and Yaq̓it ʔa·knuqƛi ’it to discuss next steps in engagement. Teck advised KNC and Yaq̓it ʔa·knuqƛi ’it that the memo discussed on November 16, 2023, would not be written as Teck leadership wanted to meet with Ktunaxa leadership prior to giving staff direction. The discussion also included potential topics for the next workshop.	Teck will continue to support leadership dialogue and will use the feedback provided to support development of an agenda for the next workshop.
December 13, 2023	Workshop Notes	Teck provided KNC and Yaq̓it ʔa·knuqƛi ’it with draft notes from the November 15, 2023, workshop.	Teck is committed to sharing timely and accurate information with the KNC and Yaq̓it ʔa·knuqƛi ’it.
December 19, 2023	Ktunaxa Leadership Discussions	Ktunaxa Nation Council and Yaq̓it ʔa·knuqƛi ’it provided an update to Teck confirming the need for direction from Ktunaxa Nation leadership and requested to resume discussions in the New Year.	Teck provided an email response with next steps (see below).
January 15, 2024	Ktunaxa Nation/Teck Meeting	Teck met with KNC and Yaq̓it ʔa·knuqƛi ’it and discussed mine development at the Environmental Working Group meeting including January 18 meeting topics.	Teck acknowledged the KNC and Yaq̓it ʔa·knuqƛi ’it’s responses requesting clarification and offered to set up a smaller information sharing meeting if of interest for KNC on January 10, 2024.
January 18, 2024	Ktunaxa Nation/Teck Meeting	Teck met with the KNC and Yaq̓it ʔa·knuqƛi ’it to discuss next steps on mine development engagement. Potential leadership-level engagement that would help technical discussions advance was discussed.	Suggestions for discussion at the next workshop included follow-up on FRO Swift reserves, eliminating no-goes from the alternative mining area list and Ktunaxa stewardship pre-conditions. These suggestions were used to develop the workshop agenda for April 7/8.
February 1, 2024	Ktunaxa Nation/Teck Meeting	Teck, KNC, and Yaq̓it ʔa·knuqƛi ’it discussed the leadership relationship at a Senior Management Meeting.	Teck has continued to engage with KNC and Yaq̓it ʔa·knuqƛi ’it throughout the development of the Project and will continue to support leadership level dialogue.
February 2, 2024	Ktunaxa Nation/Teck Meeting	Teck met with KNC and Yaq̓it ʔa·knuqƛi ’it to discuss next steps on mine development engagement. Teck developed an update on leadership engagement, an assessment mandate, and set the agenda for the next larger group meeting.	Teck provided meeting notes to KNC and Yaq̓it ʔa·knuqƛi ’it on February 5, 2024.
February 20, 2024	Ktunaxa Nation/Teck Meeting	Teck met with KNC and Yaq̓it ʔa·knuqƛi ’it to discuss next steps on mine development engagement and scheduled a workshop for April 8 and 9, 2024.	Teck has continued to engage with KNC and Yaq̓it ʔa·knuqƛi ’it on the recommendations from the Readiness Decision. In preparation for the workshop, Teck circulated a draft agenda on March 15, 2024, for the March 18 planning meeting (see below).
March 18, 2024	Ktunaxa Nation/Teck Meeting	Teck met with KNC and Yaq̓it ʔa·knuqƛi ’it to discuss the engagement update letter to the CEAO and plan for the April 8–9, 2024, workshop.	Teck acknowledged the Ktunaxa Nation perspectives and captured meeting notes regarding the engagement update letter to the CEAO and plan for the workshop on April 8 and 9, 2024.
March 27, 2024	Ktunaxa Nation/Teck Meeting	Teck met with KNC and Yaq̓it ʔa·knuqƛi ’it to continue planning for the April 8–9 workshop.	Teck, in a continuation of efforts from the previous meeting, committed to updating the workshop posters and agenda and circulating them with KNC and Yaq̓it ʔa·knuqƛi ’it.

Table 7.1-1: Engagement with Ktunaxa Nation about the Project since Preparation of the Provincial Initial Project Description, April 9, 2020

Date	Activity	Comments	Approach to Addressing
March 28, 2024	Ktunaxa Nation/Teck Workshop Posters	Teck provided KNC and Yaq̓it ʔa·knuqƛi ’it posters for day 1 of the April 8, 2024, workshop.	Teck has continued to work collaboratively with the Ktunaxa Nation to plan mine development area discussions.
April 2, 2024	Ktunaxa Nation/Teck Mine Development Planning	Teck met with KNC and Yaq̓it ʔa·knuqƛi ’it to continue planning for the two-day Mine Development Workshop on April 8 and 9, 2024.	Teck acknowledged the feedback provided by the planning group and implemented that into the agenda and facilitation plan for the April 8–9 workshop.
April 4, 2024	Engagement Letter	Teck provided KNC, Yaq̓it ʔa·knuqƛi ’it, IAAC, BC EAO and BC EMLI a letter with an update on engagement that had occurred to date. Teck provided an update on engagement, highlighting efforts to involve KNC and Yaq̓it ʔa·knuqƛi ’it as per the Readiness Decision Letter, prioritizing collaboration, and a strong relationship with the Ktunaxa Nation.	Teck expressed its commitment to continue to collaborate on engagement activities throughout the Project.
April 8 and 9, 2024	Ktunaxa Nation/Teck Mine Development Meeting	Teck held a two-day mine development meeting with KNC and Yaq̓it ʔa·knuqƛi ’it. Topics included extraordinarily adverse effects and engagement planning in response to the Readiness Decision, the importance of discussing past and regional issues, post-readiness engagement to date, Glencore's level of involvement and questions around change in ownership, pre-conditions for new mining to occur in the Elk Valley and a proposal for addressing employment challenges.	Teck will meet with the Ktunaxa small planning group to determine next steps and will circulate meeting notes to all participants (see below).
April 25, 2024	Ktunaxa Nation/Teck Mine Development Meeting	Teck met with KNC and Yaq̓it ʔa·knuqƛi ’it to debrief and discuss next steps following the April 2024 Mine Development Meeting.	Next steps include development of a What We’ve Heard document identifying key themes identified by participants during the workshop. Teck provided a first draft of this document at the May 10 meeting (see below).
May 8, 2024	Annual Summaries for FRX and Horseshoe Ridge Exploration Programs	Teck met with KNC and Yaq̓it ʔa·knuqƛi ’it for the FRX and Horseshoe Ridge 2023 Annual Summary of Exploration Activities, where planned 2024 exploration activities were also discussed.	Teck provided KNC, Yaq̓it ʔa·knuqƛi ’it, and BC EMLI a follow-up to the annual summaries for both FRX and Horseshoe Ridge exploration programs on June 10, 2024, with further details below.
May 10, 2024	Ktunaxa Nation/Teck Mine Development Planning Meeting	Teck met with KNC and Yaq̓it ʔa·knuqƛi ’it to discuss next steps in FRX engagement.	Teck will work directly with KNC and Yaq̓it ʔa·knuqƛi ’it to advance drafting of the What We’ve Heard document collaboratively with the next meeting taking place on May 24 (see below).
May 24, 2024	Ktunaxa Nation/Teck Mine Development Meeting	Teck met with KNC and Yaq̓it ʔa·knuqƛi ’it to work collaboratively on a document providing next steps from the outcomes of the previous mine development areas workshop.	Teck acknowledged the feedback provided by KNC and Yaq̓it ʔa·knuqƛi ’it including the importance of fostering a culture of stewardship within Teck and the concept “Yaqaƛ Hankatiłiłki na ʔamak: our people care for the land, the land cares for our people” and used that to revise the What We’ve Heard document.
May 29, 2024	Ktunaxa Nation/Teck Mine Development Planning Meeting	Teck met with KNC and Yaq̓it ʔa·knuqƛi ’it to discuss next steps in FRX engagement, including an update on the “What We’ve Heard” document and next steps for on the land work.	Teck continues to work through the action items to be prepared for the following meeting scheduled for June 24, 2024. Teck provided the draft What We’ve Heard document on May 30, 2024, for KNC and Yaq̓it ʔa·knuqƛi ’it feedback.
June 6, 2024	Request for Feedback	Teck followed up with KNC and Yaq̓it ʔa·knuqƛi ’it on potential feedback they may have had on the draft What We’ve Heard document and future leadership discussions.	Teck will continue to work collaboratively with KNC and Yaq̓it ʔa·knuqƛi ’it on development of this deliverable.
June 6, 2024	Ktunaxa Nation Feedback	Ktunaxa Nation Council and Yaq̓it ʔa·knuqƛi ’it provided Teck with requested feedback from June 6, 2024.	Teck acknowledged KNC and Yaq̓it ʔa·knuqƛi ’it’s feedback on placing the leadership meeting on hold until further notice and provided options for a meeting to discuss the matter further.
June 10, 2024	Annual Summaries for FRX and Horseshoe Ridge Exploration Programs	Teck provided KNC and Yaq̓it ʔa·knuqƛi ’it and BC EMLI a follow-up to the May 8, 2024, annual summary meeting for both FRX and Horseshoe Ridge exploration programs.	Teck provided additional information on invasive plant management and information on water use. Teck confirmed they would provide information regarding ongoing exploration program updates at the meetings held every two weeks and inquired whether KNC and Yaq̓it ʔa·knuqƛi ’it would be interested in a tour.
June 18, 2024	Ktunaxa Nation Request for Briefing Note	Ktunaxa Nation Council and Yaq̓it ʔa·knuqƛi ’it requested Teck send a briefing note on the progress of projected FRX engagement and the 5-year review for the KNC leadership meeting.	Teck thanked KNC and Yaq̓it ʔa·knuqƛi ’it for the June 18, 2024, email and confirmed Teck would send the briefing note by Friday June 21, 2024.
June 18, 2024	Ktunaxa Nation/Teck Meeting	Teck met with KNC and Yaq̓it ʔa·knuqƛi ’it to discuss next steps in FRX engagement, including an update on Mine Development planning meetings, a workshop on options for alternatives, and meeting logistics.	Teck thanked KNC and Yaq̓it ʔa·knuqƛi ’it for the June 18, 2024, meeting and provided potential dates for the next small group planning meeting, a technical meeting, and a meeting on the land.
June 28, 2024	Ktunaxa Nation Feedback	Ktunaxa Nation Council and Yaq̓it ʔa·knuqƛi ’it indicated to Teck that Ktunaxa Nation will not take additional community engagements until fall 2024 and noted the planning group could take their time during summer 2024 to advance items, including the What We’ve Heard report and list for possible mining areas to tour.	Teck will continue to engage with the KNC and Yaq̓it ʔa·knuqƛi ’it in fall 2024 and support advancing items during summer 2024.

Table 7.1-1: Engagement with Ktunaxa Nation about the Project since Preparation of the Provincial Initial Project Description, April 9, 2020

Date	Activity	Comments	Approach to Addressing
July 2, 2024	KNC/Teck Meeting	Teck met with KNC and Yaq̓it ʔa·knuqƛi ’it to discuss next steps for ongoing engagement, including the agenda for the upcoming workshop.	Teck will continue to work collaboratively with KNC and Yaq̓it ʔa·knuqƛi ’it on development of this deliverable.
July 8, 2024	KNC/Teck Meeting	Teck expressed that it would be helpful to share with KNC and Yaq̓it ʔa·knuqƛi ’it the recent What We’ve Heard document and confirmed a longer technical session with KNC and Yaq̓it ʔa·knuqƛi ’it.	Teck will continue to work collaboratively with the KNC and Yaq̓it ʔa·knuqƛi ’it on development of the technical session.
July 22, 2024	KNC/EVR (formerly Teck) Meeting	EVR met with KNC and Yaq̓it ʔa·knuqƛi ’it to discuss next steps in FRX engagement, including selecting a date for the next workshop.	EVR will continue to work collaboratively with the KNC and Yaq̓it ʔa·knuqƛi ’it on development of the next workshop.
July 23, 2024	What We’ve Heard Document	EVR shared the latest version of the What We’ve Heard document with KNC and Yaq̓it ʔa·knuqƛi ’it for their review, covering topics such as "yaqaƛ hankatiƛiƛki na ʔamak: our people care for the land, and the land cares for our people," stewardship principles, and the land's role in caring for the people.	EVR will continue to work collaboratively with the KNC and Yaq̓it ʔa·knuqƛi ’it on development of this deliverable.
July 23, 2024	What We’ve Heard Document	EVR shared the Miro board and What We’ve Heard document with KNC and Yaq̓it ʔa·knuqƛi ’it as a follow-up to their July 22, 2024, meeting.	EVR will continue to work collaboratively with KNC and Yaq̓it ʔa·knuqƛi ’it on development of this deliverable.
August 12, 2024	Mine Development Workshop Agenda and Materials	EVR emailed KNC and Yaq̓it ʔa·knuqƛi ’it to plan for Mine Development Workshop #4 and provided a draft agenda and materials from the last workshop in April 2024.	EVR will continue to work collaboratively with KNC and Yaq̓it ʔa·knuqƛi ’it to plan mine development area discussions.
August 19, 2024	Mine Development Documents	Ktunaxa Nation Council and Yaq̓it ʔa·knuqƛi ’it shared documents with EVR from the April 2024 Mine Development meeting #3 as well as a proposed agenda and posters for the September 5, 2024, Mine Development meeting #4.	EVR thanked KNC and Yaq̓it ʔa·knuqƛi ’it for the documents and will continue to work collaboratively with KNC and Yaq̓it ʔa·knuqƛi ’it to plan mine development area discussions.
August 19, 2024	Mine Development Working Group Charter	EVR shared the Mine Development Working Group charter with KNC and Yaq̓it ʔa·knuqƛi ’it.	EVR remains committed to working collaboratively with KNC and Yaq̓it ʔa·knuqƛi ’it on the development of the Project.
September 4, 2024	What We’ve Heard Document	EVR shared with KNC and Yaq̓it ʔa·knuqƛi ’it the agenda, engagement tool, mine development areas descriptions and the latest version of the What We’ve Heard document.	EVR will continue to work collaboratively with KNC and Yaq̓it ʔa·knuqƛi ’it on development of these deliverables.
September 5, 2024	KNC/EVR Mine Development Workshop	EVR held Mine Development Workshop #4 with KNC and Yaq̓it ʔa·knuqƛi ’it.	EVR will continue to work collaboratively with KNC and Yaq̓it ʔa·knuqƛi ’it on next steps from the workshop.
September 19, 2024	KNC/EVR Meeting	EVR met with KNC and Yaq̓it ʔa·knuqƛi ’it to discuss the September 5 Mine Development Workshop and next steps.	EVR will continue to work collaboratively with KNC and Yaq̓it ʔa·knuqƛi ’it on next steps of the workshop.
September 26, 2024	Mine Development Workshop Notes and Photos	EVR emailed KNC and Yaq̓it ʔa·knuqƛi ’it the meeting notes and photos from Mine Development Workshop #4 held on September 5, 2024.	EVR will continue to work collaboratively with KNC and Yaq̓it ʔa·knuqƛi ’it on next steps of the workshop.
September 27, 2024	Draft Ktunaxa Nation criteria	EVR emailed KNC and Yaq̓it ʔa·knuqƛi ’it to follow up on edits to the draft Ktunaxa Nation criteria.	EVR will continue to work collaboratively with KNC and Yaq̓it ʔa·knuqƛi ’it on next steps from the workshop.
October 1, 2024	Ktunaxa Nation/EVR Meeting	EVR met with KNC and Yaq̓it ʔa·knuqƛi ’it to discuss the Mine Development Workshop #5 agenda and a potential upcoming Ktunaxa citizens tour at EVR’s shortlisted mine development areas.	EVR remains committed to working collaboratively with KNC and Yaq̓it ʔa·knuqƛi ’it on the upcoming workshop and mine development area discussions.
October 2, 2024	Email to yaqan nuʔkiy staff on renewal of signatories on the interim agreement	EVR emailed yaqan nuʔkiy attempting to reschedule the renewal of signatories on the interim agreement to reflect EVR ownership. The agreement specifically refers to dialogue in relation to the future of mining and the session was anticipated to include discussion on the FRX Project.	EVR remains committed to engaging with yaqan nuʔkiy on the development of the Project.
October 9, 2024	KNC/EVR Meeting	EVR met with KNC, Yaq̓it ʔa·knuqƛi ’it, and BC EMLI to provide an overview of the 2025 exploration program and highlight some reclamation work.	EVR remains committed to working collaboratively with KNC and Yaq̓it ʔa·knuqƛi ’it on the development of the Project.
October 9, 2024	Site Visit	Ktunaxa Nation Council and Yaq̓it ʔa·knuqƛi ’it visited the FRX site to provide an overview on exploration drilling and reclamation.	EVR is committed to working with KNC and Yaq̓it ʔa·knuqƛi ’it to support various engagement activities including site visits.
October 23, 2024	Mine Development Workshop Agenda and Materials	EVR emailed KNC and Yaq̓it ʔa·knuqƛi ’it the agenda and logistics for the Mine Development Workshop #5 and indicated that they would send an updated version of the yaqaƛ hankatiƛiƛki na ʔamak prior to the workshop.	EVR will continue to work collaboratively with KNC and Yaq̓it ʔa·knuqƛi ’it to plan the upcoming workshop.
October 24, 2024	Archaeological Work Information Request	Ktunaxa Nation Council and Yaq̓it ʔa·knuqƛi ’it requested information on behalf of KNC about the archaeological work conducted for each of the mine development areas.	EVR provided KNC and Yaq̓it ʔa·knuqƛi ’it with the requested information on October 25, 2024, and maps of the archaeological Project areas on October 29, 2024.
October 25, 2024	Email to yaqan nuʔkiy staff on renewal of signatories on the interim agreement	EVR emailed yaqan nuʔkiy staff attempting to reschedule the renewal of signatories on the interim agreement to reflect EVR ownership. The agreement specifically refers to dialogue in relation to the future of mining and the session was anticipated to include discussion on the FRX Project.	EVR remains committed to engaging with yaqan nuʔkiy on the development of the Project.
October 28, 2024	Ktunaxa Nation/EVR Mine Development Meeting	EVR met with KNC and Yaq̓it ʔa·knuqƛi ’it for the Mine Development Workshop #5. An invite was extended to yaqan nuʔkiy.	EVR will continue to work collaboratively with KNC and Yaq̓it ʔa·knuqƛi ’it to plan mine development area discussions.
October 29, 2024	Ktunaxa Nation/EVR Meeting	EVR met with KNC and Yaq̓it ʔa·knuqƛi ’it leadership to provide updates on the FRX Project and site.	EVR remains committed to working collaboratively with KNC and Yaq̓it ʔa·knuqƛi ’it on the development of the Project.
November 4, 2024	Email on Mine Development Meeting	EVR emailed KNC and Yaq̓it ʔa·knuqƛi ’it to request a debrief and next steps meeting following Mine Development Workshop #5.	EVR will continue to work collaboratively with KNC and Yaq̓it ʔa·knuqƛi ’it on next steps from the workshop.
November 7, 2024	Mine Development Workshop debrief and next steps.	EVR met with KNC and Yaq̓it ʔa·knuqƛi ’it to discuss next steps following Mine Development Workshop #5.	EVR will continue to work collaboratively with KNC and Yaq̓it ʔa·knuqƛi ’it on next steps from the workshop.

Table 7.1-1: Engagement with Ktunaxa Nation about the Project since Preparation of the Provincial Initial Project Description, April 9, 2020

Date	Activity	Comments	Approach to Addressing
November 7, 2024	Helicopter Tour	EVR hosted a helicopter tour for KNC and Aknusti focused on Mine Development areas.	EVR remains committed to engaging with KNC and Yaq̓it ʔa·knuqƚi ’it on the development of the Project.
November 13, 2024	What We’ve Heard Document Discussion Planning	Ktunaxa Nation Council and Yaq̓it ʔa·knuqƚi ’it emailed EVR and requested a meeting to discuss the yaqaƚ Hankatiƚiƚki na ʔamak (What We’ve Heard) document, suggesting possible dates and times in November 2024.	EVR will continue to work collaboratively with KNC and Yaq̓it ʔa·knuqƚi ’it on development of this deliverable.
November 18, 2024	KNC/EVR Meeting	EVR met with KNC and Yaq̓it ʔa·knuqƚi ’it to discuss ongoing engagement as well as planning for the Mine Development Workshop #6.	EVR remains committed to working collaboratively with KNC and Yaq̓it ʔa·knuqƚi ’it on the development of the Project.
November 19, 2024	Mine Development Workshop Agenda and What We’ve Heard Document Discussion Planning	EVR thanked KNC and Yaq̓it ʔa·knuqƚi ’it for meeting, shared the Mine Development Workshop #6 draft agenda and indicated they would schedule another meeting for further discussion.	EVR suggested an approach for reviewing the yaqaƚ Hankatiƚiƚki na ʔamak (What We’ve Heard) document and will continue to work collaboratively with KNC and Yaq̓it ʔa·knuqƚi ’it on the development of this deliverable.
November 19, 2024	Email to Chief and Council and yaqan nuʔkiy staff with an invite to EVR’s annual Water Quality Open House	EVR emailed Chief and Council and yaqan nuʔkiy staff with an invitation to EVR’s annual Water Quality Open House which would have also provided an opportunity for the renewal of the agreement signatories.	EVR remains committed to engaging with yaqan nuʔkiy on the development of the Project.
November 21, 2024	Ktunaxa Nation/EVR Meeting	EVR met with a KNC member (who was unable to attend the November 18, 2024, meeting) to discuss the upcoming workshop and next steps for the yaqaƚ hankatiƚiƚki na ʔamak (What We’ve Heard) document.	EVR will continue to work collaboratively with KNC and Yaq̓it ʔa·knuqƚi ’it to plan the upcoming workshop.
November 29, 2024	All-20 November Meeting	EVR’s CEO participated in the Ktunaxa Nation “All-20" Monthly Governance Meeting to follow-up on previous communications with the leadership of each Ktunaxa First Nation.	EVR will continue to work collaboratively with KNC and Yaq̓it ʔa·knuqƚi ’it at all levels on the Project
December 4, 2024	Archaeology Existing Conditions Report	EVR shared the FRX Archaeology Existing Conditions Report with KNC and Yaq̓it ʔa·knuqƚi ’it.	EVR remains committed to working collaboratively with KNC and Yaq̓it ʔa·knuqƚi ’it throughout the development of the Project.
December 4, 2024	Mine Development Workshop Draft Materials	EVR shared the draft Mine Development meeting #6 slides with KNC and Yaq̓it ʔa·knuqƚi ’it.	EVR will continue to work collaboratively with KNC and Yaq̓it ʔa·knuqƚi ’it on conducting the workshop.
December 5, 2024	KNC/EVR Mine Development Workshop	EVR held Mine Development Workshop #6 with KNC and Yaq̓it ʔa·knuqƚi ’it. An invite was extended to yaqan nuʔkiy.	EVR will continue to work collaboratively with KNC and Yaq̓it ʔa·knuqƚi ’it on workshop outcomes.
December 5, 2024	Email to Nasuʔkin Jason Louie and yaqan nuʔkiy staff	EVR emailed a letter from EVR CEO Mike Carrucan thanking the nasuʔkin for the opportunity to attend the KNC Board Meeting on November 29, 2024, and refreshed the request for a renewal of agreement signatories and the opportunity to present an update on the work being done relative to the FRX Project.	EVR remains committed to engaging with yaqan nuʔkiy on the development of the Project.
December 12, 2024	Mine Development Workshop Materials	EVR shared the final slide from the December 5, 2024, Mine Development Workshop #6 with KNC and Yaq̓it ʔa·knuqƚi ’it.	EVR will continue to work collaboratively with KNC and Yaq̓it ʔa·knuqƚi ’it on workshop outcomes.
December 12, 2024	Planning Meeting Request	EVR emailed KNC and Yaq̓it ʔa·knuqƚi ’it to request a planning meeting be held by the end of 2024.	EVR remains committed to working collaboratively with KNC and Yaq̓it ʔa·knuqƚi ’it throughout the development of the Project.
December 19, 2024	Ktunaxa Nation/EVR Meeting	EVR met with KNC and Yaq̓it ʔa·knuqƚi ’it to discuss next steps following Workshop #6, including a path forward to present engagement completed so far to leadership.	EVR will continue to work collaboratively with KNC and Yaq̓it ʔa·knuqƚi ’it on next steps following Workshop #6.
January 6, 2025	Email to nasuʔkin Jason Louie and yaqan nuʔkiy staff	EVR emailed Nasuʔkin Jason Louie and yaqan nuʔkiy staff inquiring about availability to meet during the Jan 21-22 BC Cabinet and First Nations Leaders Gathering.	EVR remains committed to engaging with yaqan nuʔkiy on the development of the Project.
January 13, 2025	Ktunaxa Nation/EVR Planning Meeting	Meeting to discuss workshop materials.	EVR will continue to work collaboratively with KNC and Yaq̓it ʔa·knuqƚi ’it on the upcoming workshop.
January 21, 2025	ʔakisq̓nuk Council/EVR Meeting	EVR met with ʔakisq̓nuk Council regarding next steps and future FRX Project engagement.	EVR will continue to work collaboratively with KNC and Yaq̓it ʔa·knuqƚi ’it on the Project.
January 23, 2025	Ktunaxa Nation/EVR Planning Meeting	Meeting to discuss workshop materials.	EVR will continue to work collaboratively with KNC and Yaq̓it ʔa·knuqƚi ’it on the upcoming workshop.
January 27, 2025	HEG and Bighorn Sheep Engagement Materials	EVR proposed a meeting with KNC and Yaq̓it ʔa·knuqƚi ’it to review HEG and Bighorn Sheep habitat presentation materials. EVR also requested a meeting on January 30 or 31, 2025, to plan future engagement.	EVR responded to the January 22, 2025 inquiry from KNC and Yaq̓it ʔa·knuqƚi ’it on the same day and followed up on January 27, 2025.
January 30, 2025	Ktunaxa Nation/EVR Planning Meeting	Meeting to discuss presentation materials and HEG and Bighorn Sheep.	EVR will continue to work collaboratively with KNC and Yaq̓it ʔa·knuqƚi ’it to plan upcoming meetings and workshops.
February 3, 2025	Ktunaxa Nation/EVR Planning Meeting	Meeting to discuss presentation materials.	EVR will continue to work collaboratively with KNC and Yaq̓it ʔa·knuqƚi ’it to plan upcoming meetings and workshops.
February 4, 2025	ʔAqʼam Chief and Council Meeting	EVR Introduction of CEO and Interim VP Sustainability	EVR will continue to engage KNC and Yaq̓it ʔa·knuqƚi ’it at all levels of the organization.
February 10, 2025	Ktunaxa Nation/EVR Planning Meeting	Meeting to discuss leadership presentation materials.	EVR will continue to work collaboratively with KNC and Yaq̓it ʔa·knuqƚi ’it on the upcoming leadership presentations.
February 11, 2025	Email to yaqan nuʔkiy staff	EVR emailed yaqan nuʔkiy staff requesting an opportunity to meet and discuss progress on the FRX Project with Chief and Council, as similar arrangements were being made with the other Ktunaxa First Nations.	EVR remains committed to engaging with yaqan nuʔkiy on the development of the Project.
February 14, 2025	Ktunaxa Nation/EVR Planning Meeting	Meeting to discuss leadership presentation materials.	EVR will continue to work collaboratively with KNC and Yaq̓it ʔa·knuqƚi ’it on the upcoming leadership presentations.

Table 7.1-1: Engagement with Ktunaxa Nation about the Project since Preparation of the Provincial Initial Project Description, April 9, 2020

Date	Activity	Comments	Approach to Addressing
February 19, 2025	ʔakisq̓nuk Chief and Council Meeting	EVR, KNC, and Yaq̓it ʔa·knuqƛi ’it staff presented collaboratively to Chief and Council on work completed on FRX since dispute resolution.	EVR will meet with the remining Ktunaxa First Nation Chief and Councils before presenting to the All-20 Leadership group and will host a community dinner and open house at ʔakisq̓nuk.
February 20, 2025	Ktunaxa Nation/EVR Planning Meeting	Meeting to discuss workshop materials	EVR will continue to work collaboratively with KNC and Yaq̓it ʔa·knuqƛi ’it to plan the upcoming workshop.
February 27, 2025	Ktunaxa Nation/EVR Planning Meeting	Meeting to finalize workshop materials.	EVR will continue to work collaboratively with KNC and Yaq̓it ʔa·knuqƛi ’it to plan the upcoming workshop.
March 4, 2025	KNC/EVR Mine Development Workshop	EVR held Mine Development Workshop #7 with KNC and Yaq̓it ʔa·knuqƛi ’it focused on plausible mitigations. An invite was extended to yaqan nuʔkiy.	EVR will take the feedback provided in the workshop and revise plausible mitigations to then be reviewed by KNC and Yaq̓it ʔa·knuqƛi ’it
March 10, 2025	EVR/KNC Meeting	EVR met with KNC and Yaq̓it ʔa·knuqƛi ‘it to discuss next steps following the March 4, 2025 workshop on plausible mitigations.	EVR is committed to working with KNC and Yaq̓it ʔa·knuqƛi ‘it on the Project and will work to advance identified action items.
March 12, 2025	ʔakisq̓nuk Community Dinner & Open House	EVR and KNC hosted a community dinner and open house to share information about the FRX project, as well as other regional items.	EVR will continue to work collaboratively with KNC and Yaq̓it ʔa·knuqƛi ’it on other community engagements.
March 14, 2025	EVR Shared Revised DPD with KNC	EVR provided KNC and Yaq̓it ʔa·knuqƛi ’it a copy of the draft Revised DPD to review sections outlining collaborative work since July 2021 DPD.	EVR requested review by April 4, 2025 in order to revise the Revised DPD.
March 18, 2025	ʔaq̓am Chief and Council Meeting	EVR and KNC presented collaboratively to Chief and Council on work completed on FRX since dispute resolution.	EVR will meet with the remaining Ktunaxa First Nation Chief and Council before presenting to the All-20 Leadership group.
March 18, 2025	KNC/EVR Planning Meeting	EVR met with KNC following the ʔaq’am Chief and Council meeting to discuss next steps.	EVR will continue to work with KNC and Yaq̓it ʔa·knuqƛi ’it to prepare for submission of the Revised DPD.
March 19, 2025	yaqan nuʔkiy Chief and Council Meeting	EVR and KNC staff presented collaboratively to Chief and Council on work completed on FRX since dispute resolution.	EVR will continue to work with KNC to plan engagements and work toward submission of the Revised DPD.
March 19, 2025	KNC/EVR Planning Meeting	EVR met with KNC following the yaqan nuʔkiy Chief and Council meeting to discuss next steps.	EVR will continue to work with KNC and Yaq̓it ʔa·knuqƛi ’it to prepare for submission of the Revised DPD.
March 26, 2025	March All-20 Leadership Meeting	EVR presented to Ktunaxa leadership at their monthly meeting to provide an update on work completed with KNC and Yaq̓it ʔa·knuqƛi ’it, next steps for engagement, and to share that EVR plans to return in April to seek a decision on submission of the Revised DPD.	EVR will continue to work with KNC and Yaq̓it ʔa·knuqƛi ’it on the Revised DPD, specifically plausible mitigations.
April 1, 2025	Ktunaxa Nation/EVR Planning Meeting	EVR met with KNC and Yaq̓it ʔa·knuqƛi ’it to discuss options for staging and steps to Revised DPD submission	EVR will continue to work collaboratively with KNC and Yaq̓it ʔa·knuqƛi ’it to prepare for submission of the Revised DPD.
April 3, 2025	Action Items from April 1 Meeting	EVR emailed KNC and Yaq̓it ʔa·knuqƛi ’it to coordinate scheduling of items discussed at the April 1 planning meeting.	EVR will continue to work collaboratively with KNC and Yaq̓it ʔa·knuqƛi ’it to plan engagements and work toward submission of the Revised DPD.
April 8, 2025	All-20 and EAO/IAAC Meetings	EVR informed Ktunaxa Nation and Yaq̓it ʔa·knuqƛi ‘it about the All-20 meeting and requested an EAO/IAAC meeting on April 22, 2025, ahead of the Ktunaxa Nation Council leadership meeting.	EVR remains committed to working collaboratively with Ktunaxa Nation throughout the development of the Project.
April 8, 2025	ʔaq̓am Chief and Council site visit planning	EVR confirmed the ʔaq̓am Chief and Council site visit for June 16, 2025 and summer field visits with Ktunaxa Nation and Yaq̓it ʔa·knuqƛi ‘it.	EVR remains committed to working collaboratively with Ktunaxa Nation throughout the development of the Project.
April 11, 2025	yaqaƚ hankatiɬiɬki na ʔamak concordance with DPD	EVR provided a concordance table to KNC and Yaq̓it ʔa·knuqƛi ’it of what from the yaqaƚ hankatiɬiɬki na ʔamak is contained in the DPD or elsewhere.	EVR will continue to work with KNC and Yaq̓it ʔa·knuqƛi ’it on the Yaq̓it ʔa·knuqƛi ’it document.
April 14, 2025	EVR Briefing Note for All-20 Leadership Meeting	EVR submitted a briefing note for the April All-20 Ktunaxa Leadership Meeting to seek a decision on submission of the Revised DPD.	EVR’s briefing note was accepted but there was not space on the agenda for an EVR presentation or participation. Following the meeting, KNC and Yaq̓it ʔa·knuqƛi ’it provided an update indicating that plausible mitigations needed further review and engagement with ʔaq'am
April 22, 2025	EVR/KNC/Yaq̓it ʔa·knuqƛi ’it/BC EAO/IAAC Meeting	EVR met with KNC, Yaq̓it ʔa·knuqƛi ’it, BC EAO and IAAC to discuss staging the FRX project	EVR will continue to work with KNC and Yaq̓it ʔa·knuqƛi ’it and Regulators on staging the Project.
April 25, 2025	KNC/EVR Meeting	EVR met with KNC CAO to discuss the All-20 meeting feedback.	EVR is committed to working with KNC and Yaq̓it ʔa·knuqƛi ‘it on the Project and will work to advance identified action items.
April 29, 2025	KNC/EVR Meeting	EVR met with KNC and Yaq̓it ʔa·knuqƛi ’it senior members. Discussion included EVR seeking an update on the progress of review of the Revised DPD and no definitive response timeline was provided.	EVR will continue to seek feedback throughout the development of the project.
May 5, 2025	Call with nasuʔkin Heidi Gravelle	EVR called nasuʔkin Heidi Gravelle from Yaq̓it ʔa·knuqƛi ’it to provide an update that the Revised DPD would be submitted on May 9, 2025.	EVR will continue to work with KNC and Yaq̓it ʔa·knuqƛi ’it throughout the development of the Project.
May 5, 2025	Call with nasuʔkin Cheryl Casimer	EVR called nasuʔkin Cheryl Casimer from ʔaq’am to provide an update that the Revised DPD would be submitted on May 9, 2025.	EVR will continue to work with KNC and Yaq̓it ʔa·knuqƛi ’it throughout the development of the Project.
May 5, 2025	Call with nasuʔkin Donald Sam	EVR called nasuʔkin Donald Sam from ʔakisq̓nuk to provide an update that the Revised DPD would be submitted on May 9, 2025.	EVR will continue to work with KNC and Yaq̓it ʔa·knuqƛi ’it throughout the development of the Project.
May 5, 2025	Call with nasuʔkin Jason Louie	EVR called nasuʔkin Jason Louie from yaqan nuʔkiy to provide an update that the Revised DPD would be submitted on May 9, 2025.	EVR will continue to work with KNC and Yaq̓it ʔa·knuqƛi ’it throughout the development of the Project.
May 8, 2025	EVR/KNC/Yaq̓it ʔa·knuqƛi ‘it Meeting	EVR met with KNC and Yaq̓it ʔa·knuqƛi ‘it to debrief the All-20 meeting and discuss next steps for Revised DPD submission.	EVR remains committed to working collaboratively with KNC and Yaq̓it ʔa·knuqƛi ‘it throughout the development of the Project.

Table 7.1-1: Engagement with Ktunaxa Nation about the Project since Preparation of the Provincial Initial Project Description, April 9, 2020

Date	Activity	Comments	Approach to Addressing
May 13, 2025	Revised Detailed Project Description and Appendices	EVR shared the draft Revised DPD appendices with the KNC and Yaq̓it ʔa·knuqƛi ‘it.	EVR is committed to working with KNC and Yaq̓it ʔa·knuqƛi ‘it on the Project and will work to advance identified action items.
May 21, 2025	Revised Detailed Project Description Submission Date	EVR agreed to delay the DPD submission to early July 2025 to allow for feedback and confirmation on plausible mitigations.	EVR remains committed to working collaboratively with KNC and Yaq̓it ʔa·knuqƛi ‘it throughout the development of the Project.
May 23, 2025	Revised Detailed Project Description Section 10 Plausible Mitigations	EVR shared the draft Revised DPD Section 10 Plausible Mitigations Table with Ktunaxa Nation for review.	EVR remains committed to working collaboratively with KNC and Yaq̓it ʔa·knuqƛi ‘it throughout the development of the Project.
May 29, 2025	EVR/KNC/Yaq̓it ʔa·knuqƛi ‘it/MCM Meeting	EVR met with the KNC, Yaq̓it ʔa·knuqƛi ‘it and MCM to discuss the 2024 Annual Summary of Exploration Activities, and the 2025 Exploration Program.	EVR remains committed to working collaboratively with KNC and Yaq̓it ʔa·knuqƛi ‘it throughout the development of the Project.
June 5, 2025	Project Staging Letter	EVR shared a draft letter with KNC and Yaq̓it ʔa·knuqƛi ‘it on FRX Project staging and requested feedback for the Revised DPD.	EVR remains committed to working collaboratively with KNC and Yaq̓it ʔa·knuqƛi ‘it throughout the development of the Project.
June 11, 2025	EVR/KNC and Yaq̓it ʔa·knuqƛi ‘it Meeting	EVR met with KNC and Yaq̓it ʔa·knuqƛi ‘it to discuss the Revised DPD submission.	EVR remains committed to working collaboratively with KNC and Yaq̓it ʔa·knuqƛi ‘it throughout the development of the Project.
June 11, 2025	Feedback on Mitigations	KNC and Yaq̓it ʔa·knuqƛi ‘it provided feedback on the Revised DPD mitigations for the FRX Project and noted further feedback may follow the Revised DPD submission.	EVR remains committed to working collaboratively with KNC and Yaq̓it ʔa·knuqƛi ‘it throughout the development of the Project.
June 16, 2025	ʔaq̓am Chief and Council Site Tour	ʔaq̓am Chief and Council met with EVR for a site visit at the FRX Project.	EVR remains committed to working collaboratively with ʔaq̓am Chief and Council throughout the development of the Project.
June 27, 2025	Feedback on June All-20 Meeting	KNC provided an update to EVR via email that the Project was discussed at the June All-20 Leadership meeting, and staging was confirmed as an important mitigation to carry forward in the Project.	EVR remains committed to working collaboratively with KNC and Yaq̓it ʔa·knuqƛi ‘it throughout the development of the Project.
June 30, 2025	EVR/KNC Meeting	EVR met with KNC to get further feedback and guidance from the June All-20 meeting. KNC confirmed wording related to importance of staging as a mitigation, and next steps for determining plausibility of mitigations in the readiness phase.	EVR remains committed to working collaboratively with KNC and Yaq̓it ʔa·knuqƛi ‘it throughout the development of the Project.

Note: In July 2024, Teck Coal Limited (Teck) changed its name to EVR Operations Limited (EVR); refer to Section 1.2.1 for details.
BC EAO= British Columbia Environmental Assessment Office; BC MCM= British Columbia Ministry of Mining and Critical Minerals; CEAO= Chief Environmental Assessment Officer; DPD = Detailed Project Description; FLNRORD = Ministry of Forests, Lands, Natural Resource Operations and Rural Development; BC EMLI = British Columbia Ministry of Energy, Mines and Low Carbon Innovation; HEG = High Elevation Grasslands; IMBA = Impact Management and Benefits Agreement; GHO = Greenhills Operations; IPD = Initial Project Description; KNC = Ktunaxa Nation Council; MYAB = Multi-Year Area Based; Q&A = questions and answers; n/a = no applicable comment; VC = valued component; WCT = Westslope Cutthroat Trout; BC EAA = British Columbia *Environmental Assessment Act*; IAAC = Impact Assessment Agency of Canada; FRX = Fording River Extension; FRO = Fording River Operations; EVR = EVR Operations Limited; CEO = Chief executive officer; VP = Vice President; TMP = Tributary Management Plan.

Given the early stage of the assessment process, proposed details of Project-specific mitigations in this Revised DPD are conceptual, with details still in development and in discussion with KNC and Yaq̓it ʔa·knuqƛi ’it. Potential Project-related effects and mitigations, including impacts to Ktunaxa rights, are described in Section 10.1. A summary of issues and concerns shared to date have been documented in the FRX Comment Tracking Table available on EPIC. EVR will work with technical advisors identified for the processes under the IAA and/or the BC EAA and with KNC and Yaq̓it ʔa·knuqƛi ’it to further identify and assess potential approaches to address issues.

Engagement activities planned to advance understanding of Ktunaxa Nation interests and develop Project-specific mitigations are identified in Table 7.1-2. Additional engagement activities will be completed as requested and as required to support information needs for KNC and Yaq̓it ʔa·knuqƛi ’it.

Table 7.1-2: Future Planned Engagement with Ktunaxa Nation Council

#	Activity
1	Participate in meetings held every two weeks with KNC staff to further discuss engagement and information requirements for the Ktunaxa Nation for the assessment process, including regulatory submissions and regional “closing the gap” commitments.
2	Meet with KNC and Yaq̓it ʔa·knuqƛi ’it to continue a collaborative approach for the assessment of potential effects of the Project on Ktunaxa’s rights and interests and to support a collaborative approach to the development of an IS/A that is informed by both Ktunaxa knowledge and western science.
3	Participate in KNC, IAAC, BC EAO and EVR calls held every two weeks to support clarity and information sharing through the assessment process.
4	Schedule meetings to discuss assessment methods, thresholds for effects, mitigations and other assessment topics as needed.
5	Maintain open information flow and communication with the KNC and, as necessary, its member communities, to identify and/or address information needs or requests.

BC EAO= British Columbia Environmental Assessment Office; KNC = Ktunaxa Nation Council; IS/A = Impact Statement/Application; IAAC = Impact Assessment Agency of Canada; EVR = EVR Operations Limited.

In January 2021, Teck (now EVR) and the Ktunaxa Nation entered into a Joint Management Agreement for private lands in the Elk Valley and Flathead River Valley purchased for conservation purposes. In 2024, EVR signed three interim agreements with Ktunaxa member communities. These agreements were signed with Yaq̓it ʔa·knuqƛi ’it, yaqan nuʔkiy and ʔakisq̓nuk, and have a focus on shared economic prosperity between EVR and these communities.

7.2 Yaq̓it ʔa·knuqƛi ’it

Yaq̓it ʔa·knuqƛi ’it is one of four Ktunaxa First Nations located in Canada. The Yaq̓it ʔa·knuqƛi’it reserve is made up of 10,600 acres near Grasmere, BC. The members of Yaq̓it ʔa·knuqƛi’it First Nation are descendants of a distinct group of people known as ʔakanuxunik’. The ʔakanuxunik’ have occupied, controlled and been stewards of the unceded ancestral lands that surround the Yaq̓it ʔa·knuqƛi’it reserve, ʔakanuxunik’ ʔamakʔis (Yaq̓it ʔa·knuqƛi ’it 2024), since time immemorial. In English, the word ʔakanuxunik’ translates to “the people that are from where the water comes out of the mountain.” ʔakanuxunik’ are members of the Ktunaxa (Kootenai) speaking peoples of British Columbia, Idaho and Montana. ʔaknumuɛtiɬɬ (Natural Law) is the word for the law given to the Ktunaxa Peoples by the Creator, speaking to why ʔakanuxunik’ people were put on the land, to take care of it and its resources. The law of the land, ʔaknumuɛtiɬɬ (Natural Law), is the law for survival. The law protects the values inherent in the land, it provides resources to survive, and in return, we uphold our covenant

with the Creator to protect and not overuse the land. It is grounded in the fact that all things are connected and must be kept in balance (Ktunaxa Nation 2010).

The Yaq̓it ʔa·knuqƚi ’it First Nation Government’s purpose is to protect and further the rights and title of ʔakanuxunik’ peoples, providing opportunities in economic development, health and wellness, employment and training, and cultural heritage.

From Nasu?kin Heidi Gravelle (Yaq̓it ʔa·knuqƚi ’it 2024):

> *Kiʔsuʔk kyukyit. Yaq̓it ʔa·knuqƚi’it is engaging in unprecedented discussions as a First Nation, and advocating for the ʔakanuxunik’ people, our future, and the protection of our land. To achieve our goals, we must forge a new path. This land is our home. It is our storyteller and our caretaker. No one understands this like we do. We began here, and long after the visitors disappear, our people will remain. I have a vision of the place I want to leave for our grandchildren, where the land is healthy, the water is clean, and the plants and animals thrive. I truly believe if we take steps to heal our land, we will also heal. To begin, we must take our rightful seat at the table.*
>
> *Council and I are actively working to insert ourselves into decision making from inception. We will no longer wait to be asked. We will speak up, for our people and for all living things. We will be heard. Together, we are stronger. Taxas.*

Yaq̓it ʔa·knuqƚi‘it is reclaiming our self-determination and sustainability, while preserving and nurturing ʔakanuxunik’ land, culture, language, and ceremony. Our vision is guided by our Ancestors, Creator and ʔaknumuɣtiƚiƚ (Natural Law) with strength and unity, ensuring that all ʔakanuxunik’ are acknowledged and respected.

Table 7.2-1 summarizes engagement activities with Yaq̓it ʔa·knuqƚi ’it since preparation of the provincial IPD and Engagement Plan.

Table 7.2-1: Engagement with Yaq̓it ʔa·knuqƚi ’it about the Project since Preparation of the Initial Project Description

Date	Activity	Comments	Approach to Addressing
July 29, 2021	DPD Submission Notification	Teck provided Yaq̓it ʔa·knuqƚi ’it with a letter advising of the submission of the DPD.	Teck expressed its commitment to continue to collaborate and incorporate feedback on the Project, assessment and mitigation measures for identified impacts.
January 20, 2023	Readiness Referral Letters	Teck provided a letter addressed to Nasu?kin Gravelle expressing gratitude for having the opportunity to work together and providing a response to the readiness referral package from the BC EAO, notification that 2023 drilling would be suspended, and a commitment to ongoing engagement.	Teck outlined in the letters that it acknowledges KNC stewardship responsibilities, interests and concerns, and work done in support of reconciliation, stewardship and the future of sustainable mining in Qukin ʔamak?is. Teck expressed the hope that Teck and KNC can build from the leadership engagement in 2022 into constructive discussions on Ktunaxa interests and concerns.

Table 7.2-1: Engagement with Yaq̓it ʔa·knuqƛi ’it about the Project since Preparation of the Initial Project Description

Date	Activity	Comments	Approach to Addressing
February 21, 2023	Readiness Decision Letter	The BC EAO provided Teck with a Readiness Decision Letter informing Teck that a Revised DPD would be required before Teck would proceed through the environmental assessment process for FRX.	Details of Teck’s response to the Readiness Decision are outlined in Sections 1.2.5, 3.0 and 4.0.
May 26, 2023	Yaq̓it ʔa·knuqƛi ’it/ Teck Meeting	Teck met with Councillors Garret Gravelle and Avery Gravelle on Teck’s research and development on source control and how it was evolving and discussed Teck’s work on keeping selenium, nitrate and other constituents out of the watershed, including the recent construction of subtoxic zones at Cedar North at the Elkview Operations and upcoming construction in the Swift area of FRO by layering legacy tailings material into mine rock storage design. The Councillors expressed an interest in seeing those projects and proposed a Teck-hosted site tour.	Teck informed Yaq̓it ʔa·knuqƛi ’it of a May 26, 2023, meeting with Councillors Garret Gravelle and Avery Gravelle where they expressed an interest in seeing those projects and proposed a Teck-hosted site tour (see below).
June 8, 2023	Site Tour	Teck proposed a site tour with Yaq̓it ʔa·knuqƛi ’it leadership and staff focused on water treatment and source control and the application to future mine development.	Teck proposed a site tour in response to interest by Councillors Garret Gravelle and Avery Gravelle in seeing Teck’s projects from their conversation on May 26, 2023.
June 15, 2023	Water Quality Management Tour Itinerary	Teck provided Yaq̓it ʔa·knuqƛi ’it with an itinerary for the water quality management tour.	The tour was subsequently postponed to October 5, 2023 (see below). Teck remains committed to supporting logistics for engagement with Yaq̓it ʔa·knuqƛi ’it.
August 31, 2023	Yaq̓it ʔa·knuqƛi ’it/ Teck Site Tour	Teck provided Yaq̓it ʔa·knuqƛi ’it with an itinerary for the October 5, 2023, site tour.	Teck provided guidance on recommended clothing and personal protective equipment and asked for a list of participants.
October 5, 2023	Yaq̓it ʔa·knuqƛi ’it/ Teck Site Tour	Teck included visits to the West Line Creek AWTF, Horseshoe reclamation area, Cedar North and SRF. Teck received overall feedback during the tour from participants who spoke highly of Teck’s water quality management and reclamation efforts.	Teck has continued to engage with Yaq̓it ʔa·knuqƛi ’it on the development of the Project.
October 31, 2023	Notice of Work Application	Teck provided Yaq̓it ʔa·knuqƛi ’it with information regarding an upcoming exploration application. Teck informed Yaq̓it ʔa·knuqƛi ’it that to understand regional groundwater, future design work and different ways of mining the area, Teck would be required to conduct exploration drilling and groundwater monitoring in 2024. Teck has continued to work collaboratively with Yaq̓it ʔa·knuqƛi ’it to plan ongoing engagement.	Teck will continue to engage with Yaq̓it ʔa·knuqƛi ’it on exploration activities including the annual update meeting on May 8, 2024 (see below).
November 15, 2023	Yaq̓it ʔa·knuqƛi ’it/ Ktunaxa Nation/Teck Workshop	Teck met with KNC and Yaq̓it ʔa·knuqƛi ’it for an all-day workshop (Mine Development Workshop #2) to discuss alternatives to the Project and ongoing Project engagement.	Teck acknowledged Yaq̓it ʔa·knuqƛi ’it‘s feedback, recognizing the importance for future engagement and relationship-building. Teck also acknowledged comments including adding “Ktunaxa sovereignty and rights” to engagement principles and providing more detail on GHO and FRO production assumptions at the next workshop.

Table 7.2-1: Engagement with Yaq̓it ʔa·knuqƛi ’it about the Project since Preparation of the Initial Project Description

Date	Activity	Comments	Approach to Addressing
November 15, 2023	Presentation Slides	Teck provided Yaq̓it ʔa·knuqƛi ’it with the November 15, 2023, presentation slides.	Teck provided the presentation slides with key updates on engagement going forward (for both Teck and Yaq̓it ʔa·knuqƛi ’it), permitting needs to sustain operation, the mine development area table and criteria, Ktunaxa criteria, existing conditions and commitments, and round table and next steps.
December 19, 2023	Leadership Engagement Update	Teck provided an update by phone and email to Yaq̓it ʔa·knuqƛi ’it on engagement with KNC and the shared interest in leadership-level engagement and direction.	Teck thanked Yaq̓it ʔa·knuqƛi ’it for the December 19, 2023, phone call and informed Yaq̓it ʔa·knuqƛi ’it that the senior management team would connect with Yaq̓it ʔa·knuqƛi ’it leadership to discuss a shared mandate for the mine development engagement. Plans for continued engagement included discussions on potential resource development areas, the criteria to compare areas and regional stewardship conditions.
January 18, 2024	Yaq̓it ʔa·knuqƛi ’it/ Teck Meeting	Teck met with Yaq̓it ʔa·knuqƛi ’it to discuss next steps on mine development engagement. Yaq̓it ʔa·knuqƛi ’it expressed an interest in understanding Swift reserves, and Teck walked through the map of phases and also looked at GHO future phases.	Teck has continued to engage with Yaq̓it ʔa·knuqƛi ’it on the development of the Project. The topic of Swift reserves was discussed at the mine development area meetings in April 2024.
February 22, 2024	Yaq̓it ʔa·knuqƛi ’it/ Teck Meeting	Teck met with Yaq̓it ʔa·knuqƛi ’it to discuss next steps on mine development engagement and scheduled a joint workshop with KNC for April 8 and 9, 2024.	Teck has continued to engage with Yaq̓it ʔa·knuqƛi ’it on the development of the Project.
March 27, 2024	Yaq̓it ʔa·knuqƛi ’it/ Teck Meeting	Teck met with Yaq̓it ʔa·knuqƛi ’it to discuss plans for engagement on FRX and the April 2024 Mine Development Workshop. Yaq̓it ʔa·knuqƛi ’it requested Teck engage with them independently/separately.	Teck acknowledged Yaq̓it ʔa·knuqƛi ’it’s request to have their own FRX engagement and confirmed attendance for the workshop on April 8 and 9, 2024.
March 28, 2024	Yaq̓it ʔa·knuqƛi ’it/ Teck Workshop Posters	Teck provided Yaq̓it ʔa·knuqƛi ’it with posters for day 1 of the April 2024 workshop.	Teck shared its plan with Yaq̓it ʔa·knuqƛi ’it for preparing for the April 2024 workshop and offered to answer or receive any questions, comments or concerns.
April 2, 2024	Ktunaxa Nation/Teck Mine Development Planning Meeting	Teck met with KNC and Yaq̓it ʔa·knuqƛi ’it to continue planning for the two-day Mine Development Workshop in April 2024.	Teck will continue to engage with Yaq̓it ʔa·knuqƛi ’it to collaboratively plan engagement meetings.
April 4, 2024	Engagement Letter	Teck provided KNC, Yaq̓it ʔa·knuqƛi ’it, IAAC, BC EAO and BC EMLI with a letter with an update on engagement that had occurred to date.	Teck provided an update on the engagement progress, highlighting efforts to involve KNC and Yaq̓it ʔa·knuqƛi ’it as per the decision letter, prioritizing collaboration and a strong relationship with the Ktunaxa Nation.
April 8 and 9, 2024	Ktunaxa Nation/ Yaq̓it ʔa·knuqƛi ’it/ Teck Mine Development Meeting	Teck held Mine Development Workshop #3 over two days with KNC and Yaq̓it ʔa·knuqƛi ’it. Topics included extraordinarily adverse effects and engagement planning in response to the DPD Readiness Decision, the importance of discussing past and regional issues, post-readiness engagement to date, Glencore’s level of involvement and questions around change in ownership, pre-conditions for new mining to occur in the Elk Valley and a proposal for addressing employment challenges.	Teck will meet with the Ktunaxa small planning group to determine next steps and will circulate meeting notes to all participants (see below).

Table 7.2-1: Engagement with Yaq̓it ʔa·knuqƛi ’it about the Project since Preparation of the Initial Project Description

Date	Activity	Comments	Approach to Addressing
April 25, 2024	Ktunaxa Nation/Teck Mine Development Debrief Meeting	Teck met with KNC and Yaq̓it ʔa·knuqƛi ’it to debrief and discuss next steps following the April 2024 mine development meeting.	Teck summarized the workshop and highlighted participant feedback. Teck acknowledged Yaq̓it ʔa·knuqƛi ’it perspectives on citizen involvement, alternative means and a potential community session.
May 8, 2024	Annual Summaries for FRX and Horseshoe Ridge Exploration Programs	Teck met with KNC and Yaq̓it ʔa·knuqƛi ’it for the FRX and Horseshoe Ridge 2023 Annual Summary of Exploration Activities, where planned 2024 exploration activities were discussed.	Teck provided Yaq̓it ʔa·knuqƛi ’it with additional details on June 10, 2024 (see below).
May 10, 2024	Ktunaxa Nation/Teck Mine Development Planning Meeting	Teck met with KNC and Yaq̓it ʔa·knuqƛi ’it to discuss next steps in FRX engagement.	Teck is committed to further engagement with Yaq̓it ʔa·knuqƛi ’it on the Project and is working to advance identified action items including assigning EVR authors for the mine development meetings summary of What We’ve Heard document, scheduling group meetings and planning for a helicopter tour.
May 16, 2024	Framework for Assessing Future Mining	Teck provided Yaq̓it ʔa·knuqƛi ’it with a follow-up email with high-level thoughts to develop a framework for assessing future mining focused on alignment with Yaq̓it ʔa·knuqƛi ’it, including a centralized vision with reconciliation as a key concept.	Teck will continue to work with Yaq̓it ʔa·knuqƛi ’it to advance a process for assessing future mining.
May 29, 2024	Ktunaxa Nation/Teck Mine Development Planning Meeting	Teck met with KNC and Yaq̓it ʔa·knuqƛi ’it to discuss next steps in FRX engagement.	Teck provided the draft What We’ve Heard document on May 30, 2024, for Yaq̓it ʔa·knuqƛi ’it feedback.
June 10, 2024	Annual Summaries for FRX and Horseshoe Ridge Exploration Programs	Teck provided Yaq̓it ʔa·knuqƛi ’it and BC EAO a follow-up to the annual summaries for both FRX and Horseshoe Ridge exploration programs.	Teck provided additional information on invasive plant management and information on water use. Teck confirmed it would provide information regarding ongoing exploration program updates at the meetings held every two weeks and inquired whether Yaq̓it ʔa·knuqƛi ’it would be interested in a tour.
June 18, 2024	Yaq̓it ʔa·knuqƛi ’it/ Teck Meeting	Teck met with KNC and Yaq̓it ʔa·knuqƛi ’it to discuss next steps in FRX engagement.	Teck thanked Yaq̓it ʔa·knuqƛi ’it for the June 18, 2024, email and confirmed Teck would send the briefing note by Friday, June 21, 2024.
June 26, 2024	Yaq̓it ʔa·knuqƛi ’it/ Teck Meeting	Teck met with Yaq̓it ʔa·knuqƛi ’it to discuss their vision for the future of mining, including identification of key deliverables and plan to collaborate on them.	Teck will continue to work collaboratively with Yaq̓it ʔa·knuqƛi ’it on development of these deliverables.
July 2, 2024	Yaq̓it ʔa·knuqƛi ’it/ KNC/Teck Meeting	Teck met with KNC and Yaq̓it ʔa·knuqƛi ’it staff to discuss next steps for ongoing engagement, including the agenda for the upcoming workshop.	Teck will continue to work collaboratively with Yaq̓it ʔa·knuqƛi ’it on development of these deliverables.
July 8, 2024	Yaq̓it ʔa·knuqƛi ’it/ Teck Meeting	Teck expressed that it would be helpful to share with KNC and Yaq̓it ʔa·knuqƛi ’it the recent What We’ve Heard document and confirmed a longer technical session with KNC and Yaq̓it ʔa·knuqƛi ’it.	Teck will continue to work collaboratively with Yaq̓it ʔa·knuqƛi ’it on development of the technical session.
July 22, 2024	Yaq̓it ʔa·knuqƛi ’it/ EVR Meeting	EVR met with KNC and Yaq̓it ʔa·knuqƛi ’it to discuss next steps in FRX engagement, including selecting a date for the next workshop.	EVR will continue to engage with Yaq̓it ʔa·knuqƛi ’it on the Project and will work to advance identified action items.

Table 7.2-1: Engagement with Yaq̓it ʔa·knuqƛi ’it about the Project since Preparation of the Initial Project Description

Date	Activity	Comments	Approach to Addressing
August 29, 2024	Email	EVR informed Yaq̓it ʔa·knuqƛi ’it about sampling in their territory from August 28 to September 10, 2024, to support future mining at the FRX site and invited community participation.	EVR is committed to sharing timely and accurate information and will continue to engage with the KNC and Yaq̓it ʔa·knuqƛi ’it to support future mining at the FRX site.
September 4, 2024	What We’ve Heard Document	EVR emailed KNC and Yaq̓it ʔa·knuqƛi ’it the agenda, engagement tool, mine development areas descriptions and the Yaqaƛ Hankatiƛiƛki na ʔamak What We've Heard report.	EVR will continue to work collaboratively with Yaq̓it ʔa·knuqƛi ’it on the development of these deliverables.
September 4, 2024	Yaq̓it ʔa·knuqƛi ’it/ EVR Meeting	EVR met with Yaq̓it ʔa·knuqƛi ’it to discuss regional and Project updates.	EVR will continue to engage with Yaq̓it ʔa·knuqƛi ‘’it on the Project and will work to advance identified action items.
September 5, 2024	Yaq̓it ʔa·knuqƛi ’it/ EVR Mine Development Workshop	EVR held Mine Development Workshop #4 with KNC and Yaq̓it ʔa·knuqƛi ’it.	EVR will continue to engage with Yaq̓it ʔa·knuqƛi ’it on the Project and next steps from the workshop.
September 11, 2024	Mine Development Workshop Notes	EVR shared with Yaq̓it ʔa·knuqƛi ’it the meeting notes from Mine Development Workshops 1-4 for Chief and Council.	EVR will continue to engage with Yaq̓it ʔa·knuqƛi ’it on the Project and will work to advance identified action items.
September 18, 2024	Yaq̓it ʔa·knuqƛi ’it/ EVR Future Mining Working Group Document Discussion	EVR met with Yaq̓it ʔa·knuqƛi ’it to discuss the Future Mining Working Group discussion document. Yaq̓it ʔa·knuqƛi ’it requested to EVR to share an updated draft once complete.	EVR will continue to work collaboratively with Yaq̓it ʔa·knuqƛi ’it on development of the Future Mining Working Group Document.
September 19, 2024	Email on Notetaking Process	EVR emailed Yaq̓it ʔa·knuqƛi ’it about their notetaking process for meetings. EVR requested a meeting with Yaq̓it ʔa·knuqƛi ’it to discuss organizing a summary of past discussions.	EVR is committed to further engagement with Yaq̓it ʔa·knuqƛi ’it on the Project and is working to advance identified action items.
September 19, 2024	Yaq̓it ʔa·knuqƛi ’it/ EVR Meeting	EVR met with KNC and Yaq̓it ʔa·knuqƛi ’it to discuss the Mine Development Workshop #4 and next steps.	EVR will continue to work collaboratively with Yaq̓it ʔa·knuqƛi ’it on next steps from the workshop.
September 26, 2024	Mine Development Workshop Notes and Photos	EVR emailed KNC and Yaq̓it ʔa·knuqƛi ’it meeting notes and photos from Mine Development Workshop #4 held on September 5, 2024.	EVR is committed to further engagement with Yaq̓it ʔa·knuqƛi ’it on the Project and is working to advance identified action items.
October 9, 2024	Site Visit	EVR met with KNC, Yaq̓it ʔa·knuqƛi ’it, and BC EMLI to provide an overview of the 2025 exploration program and highlight some reclamation work.	EVR is committed to working with Yaq̓it ʔa·knuqƛi ’it to support various engagement activities including site visits.
October 16, 2024	Yaq̓it ʔa·knuqƛi ’it/ EVR Meeting	EVR met with Yaq̓it ʔa·knuqƛi ’it Chief & Council to discuss an updated Project scope and proposed mitigations to address Yaq̓it ʔa·knuqƛi ’it concerns regarding the Project.	EVR will continue to work collaboratively with Yaq̓it ʔa·knuqƛi ’it Chief & Council.
October 23, 2024	Mine Development Workshop Agenda and Materials	EVR emailed KNC and Yaq̓it ʔa·knuqƛi ’it the agenda and logistics for the Mine Development Workshop #5 and indicated that they would send an updated version of the Yaqaƛ Hankatiƛiƛki na ʔamak prior to the workshop.	EVR will continue to work collaboratively with Yaq̓it ʔa·knuqƛi ’it to plan the upcoming workshop.
October 28, 2024	Yaq̓it ʔa·knuqƛi ’it/ EVR Mine Development Meeting	EVR met with KNC and Yaq̓it ʔa·knuqƛi ’it for the Mine Development Workshop #5.	EVR will continue to work collaboratively with Yaq̓it ʔa·knuqƛi ’it to plan mine development area discussions.

Table 7.2-1: Engagement with Yaq̓it ʔa·knuqƛi ’it about the Project since Preparation of the Initial Project Description

Date	Activity	Comments	Approach to Addressing
October 29, 2024	Yaq̓it ʔa·knuqƛi ’it/ EVR Meeting	EVR met with the KNC and Yaq̓it ʔa·knuqƛi ’it leadership to provide updates on the FRX Project and site.	EVR remains committed to working collaboratively with Yaq̓it ʔa·knuqƛi ’it on the development of the Project.
November 4, 2024	Email on Mine Development Meeting	EVR emailed KNC and Yaq̓it ʔa·knuqƛi ’it to request a debrief and next steps meeting following Mine Development Workshop #5.	EVR will continue to engage with Yaq̓it ʔa·knuqƛi ’it on the Project and next steps from the workshop.
November 7, 2024	Mine Development Workshop debrief and next steps.	EVR met with KNC and Yaq̓it ʔa·knuqƛi ’it staff to discuss next steps following Mine Development Workshop #5.	EVR will continue to work collaboratively with Yaq̓it ʔa·knuqƛi ’it to plan the upcoming workshop.
November 7, 2024	Helicopter Tour	EVR hosted a helicopter tour for KNC and Yaq̓it ʔa·knuqƛi ’it, and ʔa·knusti focused on Mine Development areas.	EVR remains committed to engaging with Yaq̓it ʔa·knuqƛi ’it on the development of the Project.
November 18, 2024	Yaq̓it ʔa·knuqƛi ’it/ EVR Meeting	EVR met with KNC and Yaq̓it ʔa·knuqƛi ’it staff to discuss ongoing engagement as well as planning for the Mine Development Workshop #6.	EVR will continue to work collaboratively with Yaq̓it ʔa·knuqƛi ’it to plan the upcoming workshop.
November 19, 2024	Mine Development Workshop Agenda	EVR thanked KNC and Yaq̓it ʔa·knuqƛi ’it for meeting and shared the Mine Development Workshop #6 draft agenda, indicating they would schedule another meeting for further discussion.	EVR will continue to work collaboratively with Yaq̓it ʔa·knuqƛi ’it to plan the upcoming workshop.
November 29, 2024	All-20 November Meeting	EVR CEO participated in the Yaq̓it ʔa·knuqƛi ’it “All-20" Monthly Governance Meeting to follow-up on previous communications with the leadership of each Ktunaxa First Nation.	EVR will continue to work collaboratively with Yaq̓it ʔa·knuqƛi ’it at all levels on the Project
December 4, 2024	Mine Development Workshop Draft Materials	EVR shared the draft Mine Development Workshop #6 slides with KNC and Yaq̓it ʔa·knuqƛi ’it.	EVR will continue to work collaboratively with Yaq̓it ʔa·knuqƛi ’it on conducting the workshop.
December 5, 2024	Yaq̓it ʔa·knuqƛi ’it/ EVR Mine Development Workshop	EVR held Mine Development Workshop #6 with KNC and Yaq̓it ʔa·knuqƛi ’it	EVR will continue to work collaboratively with Yaq̓it ʔa·knuqƛi ’it on workshop outcomes.
December 11, 2024	Yaq̓it ʔa·knuqƛi ’it/ EVR Meeting	EVR met with Yaq̓it ʔa·knuqƛi ’it to discuss biweekly engagements, FRX Project updates and the GHO Cougar Phase 5 Mine Review Committee process.	EVR has continued to engage with Yaq̓it ʔa·knuqƛi ’it throughout the development of the Project.
December 12, 2024	Mine Development Workshop Materials	EVR shared the final slide from the December 5, 2024, Mine Development Workshop #6 with KNC and Yaq̓it ʔa·knuqƛi ’it.	EVR will continue to work collaboratively with Yaq̓it ʔa·knuqƛi ’it on workshop outcomes.
December 12, 2024	Planning Meeting Request	EVR emailed KNC and Yaq̓it ʔa·knuqƛi ’it to request a planning meeting be held by the end of 2024.	EVR remains committed to working collaboratively with Yaq̓it ʔa·knuqƛi ’it throughout the development of the Project.
December 19, 2024	Yaq̓it ʔa·knuqƛi ’it/ EVR Meeting	EVR met with KNC and Yaq̓it ʔa·knuqƛi ’it to discuss next steps following Workshop #6, including a path forward to present engagement completed so far to leadership.	EVR will continue to work collaboratively with Yaq̓it ʔa·knuqƛi ’it on next steps following Workshop #6.
January 13, 2025	Yaq̓it ʔa·knuqƛi ’it/ EVR Planning Meeting	Meeting to discuss workshop materials.	EVR will continue to work collaboratively with Yaq̓it ʔa·knuqƛi ’it on the upcoming workshop.
January 21, 2025	Yaq̓it ʔa·knuqƛi ’it/ EVR Meeting	EVR met with Yaq̓it ʔa·knuqƛi ’it council to discuss regional topics and upcoming steps on FRX.	EVR remains committed to working collaboratively with Yaq̓it ʔa·knuqƛi ’it throughout the development of the Project.
January 23, 2025	Yaq̓it ʔa·knuqƛi ’it/ EVR Planning Meeting	Meeting to discuss workshop materials.	EVR will continue to work collaboratively with Yaq̓it ʔa·knuqƛi ’it on the upcoming workshop.

Table 7.2-1: Engagement with Yaq̓it ʔa·knuqƛi ’it about the Project since Preparation of the Initial Project Description

Date	Activity	Comments	Approach to Addressing
January 27, 2025	HEG and Bighorn Sheep Engagement Materials	EVR proposed a meeting with KNC and Yaq̓it ʔa·knuqƛi ’it to review HEG and Bighorn Sheep habitat presentation materials. EVR also requested a meeting on January 30 or 31, 2025, to plan future engagement.	EVR responded to the January 22, 2025, inquiry from KNC and Yaq̓it ʔa·knuqƛi ’it on the same day and followed up on January 27, 2025.
January 30, 2025	Yaq̓it ʔa·knuqƛi ’it/ EVR Planning Meeting	Meeting to discuss presentation materials and HEG and Bighorn Sheep.	EVR will continue to work collaboratively with KNC and Yaq̓it ʔa·knuqƛi ’it to plan upcoming meetings and workshops.
February 3, 2025	Yaq̓it ʔa·knuqƛi ’it/ EVR Planning Meeting	Meeting to discuss presentation materials.	EVR will continue to work collaboratively with Yaq̓it ʔa·knuqƛi ’it to plan upcoming meetings and workshops.
February 10, 2025	Yaq̓it ʔa·knuqƛi ’it/ EVR Planning Meeting	Meeting to discuss leadership presentation materials.	EVR will continue to work collaboratively with Yaq̓it ʔa·knuqƛi ’it on the upcoming leadership presentations.
February 11, 2025	Yaq̓it ʔa·knuqƛi ’it Chief and Council Meeting	EVR and Yaq̓it ʔa·knuqƛi ’it staff presented collaboratively to Chief and Council on work completed on FRX since dispute resolution.	EVR will meet with the remaining Ktunaxa First Nation Chief and Councils before presenting to the All-20 Leadership group.
February 20, 2025	Yaq̓it ʔa·knuqƛi ’it/ EVR Meeting	Meeting to discuss workshop materials	EVR will continue to work collaboratively with Yaq̓it ʔa·knuqƛi ’it to plan the upcoming workshop.
February 27, 2025	Yaq̓it ʔa·knuqƛi ’it/ EVR Meeting	Meeting to finalize workshop materials.	EVR will continue to work collaboratively with Yaq̓it ʔa·knuqƛi ’it to plan the upcoming workshop.
March 4, 2025	Yaq̓it ʔa·knuqƛi ’it/ EVR Mine Development Workshop	EVR held Mine Development workshop #7 with KNC and Yaq̓it ʔa·knuqƛi ’it focused on plausible mitigations.	EVR will take the feedback provided in the workshop and revise plausible mitigations to then be reviewed by KNC and Yaq̓it ʔa·knuqƛi ’it.
March 10, 2025	EVR/KNC/ Yaq̓it ʔa·knuqƛi ‘it Meeting	EVR met with KNC and Yaq̓it ʔa·knuqƛi ‘it to discuss next steps following the March 4, 2025 workshop on plausible mitigations.	EVR remains committed to working collaboratively with Yaq̓it ʔa·knuqƛi ‘it throughout the development of the Project.
March 12, 2025	EVR/KNC/ Yaq̓it ʔa·knuqƛi ‘it Meeting	EVR met with Yaq̓it ʔa·knuqƛi ‘it to discuss regulatory updates on the FRX Project and future reclamation work.	EVR remains committed to working collaboratively with Yaq̓it ʔa·knuqƛi ‘it throughout the development of the Project.
March 14, 2025	EVR Shared Revised DPD with Yaq̓it ʔa·knuqƛi ’it	EVR provided Yaq̓it ʔa·knuqƛi ’it a copy of the draft Revised DPD to review sections outlining collaborative work since July 2021 DPD.	EVR requested review by April 4, 2025, and will await Yaq̓it ʔa·knuqƛi ’it’s feedback in order to revise the Revised DPD.
March 26, 2025	March All-20 Leadership Meeting	EVR presented to Ktunaxa leadership at their monthly meeting to provide an update on work completed with KNC and Yaq̓it ʔa·knuqƛi ’it, next steps for engagement, and to share that EVR plans to return in April to seek a decision on submission of the Revised DPD.	EVR will continue to work with KNC and Yaq̓it ʔa·knuqƛi ’it on the Revised DPD, specifically plausible mitigations.
April 1, 2025	Ktunaxa Nation/EVR Planning Meeting	EVR met with KNC and Yaq̓it ʔa·knuqƛi ’it staff to discuss options for staging and steps to Revised DPD submission	EVR will continue to work collaboratively with KNC and Yaq̓it ʔa·knuqƛi ’it to prepare for submission of the Revised DPD.
April 1, 2025	Yaq̓it ʔa·knuqƛi ’it Feedback on Section 7.2 of the Revised DPD	Yaq̓it ʔa·knuqƛi ’it suggested that EVR use Yaq̓it ʔa·knuqƛi ’it’s website for development of this section and send to Yaq̓it ʔa·knuqƛi ’it for review.	EVR updated the section using the suggested source and provided to Yaq̓it ʔa·knuqƛi ’it for review on April 15, 2025.
April 1, 2025	EVR/KNC/ Yaq̓it ʔa·knuqƛi ‘it Meeting	EVR met with KNC and Yaq̓it ʔa·knuqƛi ‘it for a half-day planning session to review the DPD and discuss the yaqał hankatiɬiɬki na ʔamak.	EVR is committed to working with Yaq̓it ʔa·knuqƛi ‘it on the Project and will work to advance identified action items.
April 4, 2025	Yaq̓it ʔa·knuqƛi ’it Feedback on Revised DPD	Yaq̓it ʔa·knuqƛi ’it provided EVR with comments on the Revised DPD.	EVR addressed the comments in the Revised DPD and met with Yaq̓it ʔa·knuqƛi ’it on April 24, 2025
April 8, 2025	All-20 and EAO/IAAC Meetings	EVR informed KNC and Yaq̓it ʔa·knuqƛi ‘it about the All-20 meeting and requested an BC EAO/IAAC meeting on April 22, 2025, ahead of the KNC leadership meeting.	EVR remains committed to working collaboratively with Yaq̓it ʔa·knuqƛi ‘it throughout the development of the Project.

Table 7.2-1: Engagement with Yaq̓it ʔa·knuqƚi ’it about the Project since Preparation of the Initial Project Description

Date	Activity	Comments	Approach to Addressing
April 8, 2025	ʔaq̓am Chief and Council site visit	EVR confirmed the ʔaq̓am Chief and Council site visit for June 16, 2025 and summer field visits with KNC and Yaq̓it ʔa·knuqƚi ‘it.	EVR remains committed to working collaboratively with Yaq̓it ʔa·knuqƚi ‘it throughout the development of the Project.
April 11, 2025	yaqaƚ hankatiɬiɬki na ʔamak concordance with DPD	EVR provided a concordance table to KNC and Yaq̓it ʔa·knuqƚi ’it of what from the Yaqaƚ hankatiɬiɬki na ʔamak is contained in the DPD or elsewhere.	EVR will continue to work with NC and Yaq̓it ʔa·knuqƚi ’iton the Yaq̓it ʔa·knuqƚi ’it document.
April 14, 2025	EVR Briefing Note for All-20 Leadership Meeting	EVR submitted a briefing note for the April All-20 Ktunaxa Leadership Meeting to seek a decision on submission of the Revised DPD.	It was later shared that EVR’s briefing note was accepted but there would not be space on the agenda for an EVR presentation or participation. Following the meeting, KNC and Yaq̓it ʔa·knuqƚi ’it provided an update indicating that plausible mitigations needed further review by the KNC and Yaq̓it ʔa·knuqƚi ’it and further engagement with ʔaq'am was needed.
April 22, 2025	EVR/KNC/ Yaq̓it ʔa·knuqƚi ’it/ EAO/IAAC Meeting	EVR met with KNC, Yaq̓it ʔa·knuqƚi ’it, BC EAO and IAAC to discuss staging the FRX project.	EVR will continue to work with KNC and Yaq̓it ʔa·knuqƚi ’it and Regulators on staging the Project.
April 24, 2025	Revised DPD Comments Meeting	EVR met with Yaq̓it ʔa·knuqƚi ’it to address comments provided on the Revised DPD.	EVR will continue to work collaboratively with Yaq̓it ʔa·knuqƚi ’it on the Project.
May 5, 2025	Call with nasuʔkin Heidi Gravelle	EVR called nasuʔkin Heidi Gravelle from Yaq̓it ʔa·knuqƚi ’it to provide an update that the Revised DPD would be submitted on May 9, 2025.	EVR will continue to work with KNC and Yaq̓it ʔa·knuqƚi ’it throughout the development of the Project.
May 13, 2025	Revised Detailed Project Description and Appendices	EVR shared the revised DPD appendices with the KNC and Yaq̓it ʔa·knuqƚi ‘it.	EVR is committed to working with Yaq̓it ʔa·knuqƚi ‘it on the Project and will work to advance identified action items.
May 15, 2025	Revised Detailed Project Description Submission Date	EVR, KNC, and Yaq̓it ʔa·knuqƚi ‘it agreed to delay the DPD submission to early July 2025 to allow for feedback and confirmation on plausible mitigations.	EVR remains committed to working collaboratively with Yaq̓it ʔa·knuqƚi ‘it throughout the development of the Project.
June 5, 2025	Project Staging	EVR shared a draft letter with KNC and Yaq̓it ʔa·knuqƚiˀit on FRX Project staging and requested feedback for the revised DPD.	EVR remains committed to working collaboratively with Yaq̓it ʔa·knuqƚiˀit throughout the development of the Project.
June 5, 2025	Project Staging	EVR shared a draft letter with Yaq̓it ʔa·knuqƚiˀit on EVR's commitment to staging the FRX Project to allow for future decision making and align with Yaq̓it ʔa·knuqƚiˀit priorities.	EVR remains committed to working collaboratively with Yaq̓it ʔa·knuqƚiˀit throughout the development of the Project.

Note: In July 2024, Teck Coal Limited (Teck) changed its name to EVR Operations Limited (EVR); refer to Section 1.2.1 for details.
BC EAO= British Columbia Environmental Assessment Office; DPD = Detailed Project Description; KNC = Ktunaxa Nation Council; AWFT = active water treatment facility; SRF = saturated rock fill; GHO = Greenhills Operations; BC EMLI = Ministry of Energy, Mines and Low Carbon Innovation; HEG = High Elevation Grasslands; FRX = Fording River Extension; FRO = Fording River Operations; IAAC = Impact Assessment Agency of Canada.

Given the early stage of the assessment process, details of Project-specific mitigations are still in development and in discussion with Yaq̓it ʔa·knuqƚi ’it. Potential Project-related effects and mitigations, including impacts to Yaq̓it ʔa·knuqƚi ’it rights are described in Section 10.1.

Engagement activities planned to advance understanding of Yaq̓it ʔa·knuqƚi ’it interests and develop Project-specific mitigations are identified in Table 7.2-2.

Table 7.2-2: Future Planned Engagement with Yaq̓it ʔa·knuqƛi ’it

Item #	Activity
1	Participate in quarterly leadership meetings.
2	Participate in ongoing meetings with Yaq̓it ʔa·knuqƛi ’it to further discuss engagement and information requirements for the assessment process, including regulatory submissions and regional “closing the gap” commitments.
3	Meet with Yaq̓it ʔa·knuqƛi ’it to continue a collaborative approach for the assessment of potential effects of the Project on Yaq̓it ʔa·knuqƛi ’it’s rights and interests and to support a collaborative approach to the development of an IS/A that is informed by both Ktunaxa knowledge and western science.
4	Participate in KNC, IAAC, BC EAO and EVR calls held every two weeks to support clarity and information sharing through the assessment process.
5	Schedule meetings to discuss assessment methods, thresholds for effects, mitigations and other assessment topics as needed.
6	Maintain open information flow and communication with Yaq̓it ʔa·knuqƛi ’it to identify and/or address information needs or requests.

KNC = Ktunaxa Nation Council; IS/A = Impact Statement/Application; IAAC = Impact Assessment Agency of Canada; BC EAO = British Columbia Environmental Assessment Office; EVR = EVR Operations Limited.

In April 2024, the Yaq̓it ʔa·knuqƛi ’it First Nation and EVR (formerly Teck) announced the signing of a Relationship Charter, which formalizes the commitment of both parties to develop and sustain a strong working relationship, and a Stewardship Agreement, which outlines collaboration on environmental and cultural stewardship projects. The Relationship Charter establishes a path forward to collaboratively advance responsible mining and land stewardship within qukin ʔamakis. The Stewardship Agreement sets out commitments for both parties in areas including:

- building Yaq̓it ʔa·knuqƛi ’it capacity to collaborate on stewardship projects benefitting the ʔakanuxunik ʔamakis (Yaq̓it ʔa·knuqƛi ’it territory)
- advancing Yaq̓it ʔa·knuqƛi ’it governance and reconciliation initiatives to benefit the well-being of all ʔakanuxunik
- ongoing engagement and relationship-building that supports the region’s economic well-being and ensures ʔa·kxam̓is q̓api qapsin (all living things) are safeguarded

Yaq̓it ʔa·knuqƛi ’it and EVR have committed to continued collaboration and engagement based on the principles of trust, respect, transparency and meaningfulness.

7.3 Shuswap Band

Shuswap Band (also known by its traditional name of *Kenpesq’t*) is the farthest southeastern community of the Secwepémc Nation. Shuswap Band’s present-day community is located on Shuswap Band’s reserve situated on the north end of Lake Windermere and near the Town of Invermere between the Rocky and Purcell mountain ranges within the Columbia Valley. Secwepémc Nation’s Traditional Territory is called *Secwépemcúl’ecw* (Shuswap Traditional Territory) and stretches from the Valemount area to the north, south to the current BC–US border, east to the BC–Alberta border and west to the Kamloops area, including the Elk Valley. The southeastern part of *Secwépemcúl’ecw* includes Shuswap Band’s Traditional Territory, referred to as Shuswap Band’s Caretaker Area, which encompasses the Elk Valley (Figure 5.1-3).

The Elk Valley was traditionally used by Shuswap Band for habitation, subsistence and travel; in more recent years it continues to be used for subsistence, travel, habitation and peaceful enjoyment. Shuswap Band's historical records, including oral and historical Treaty records, document Shuswap Band's rights and interests in the Caretaker Area.

While Shuswap Band historically governed their Caretaker Area with laws that reflected the land, Shuswap Band has since adopted western laws (Shuswap Band 2022). Shuswap Band's current leadership structure consists of a Chief and two Councillors who support the implementation of Shuswap Band's governance (Shuswap Band 2023). Shuswap Band is not part of a formal Treaty or Treaty negotiations but is currently assessing options to self-govern and self-determine (Shuswap Band 2023). Shuswap Band has a Land Use Plan for their reserve lands and an operational land code under the First Nations Land Management Framework Agreement.

Teck (now EVR) began engaging with Shuswap Band about the Project in early 2019 and hosted a Project introduction meeting in fall 2019. Since then, Shuswap Band and EVR have developed a collaborative approach for the assessment of potential effects of the Project on Shuswap Band's rights and interests, including a plan for the development of an IS/A that is informed by both Indigenous knowledge and western science. EVR acknowledges that Shuswap Band has existing Indigenous knowledge and traditional land use information that may be relevant to the Project. EVR is committed to engaging on the applicability of any existing studies or information to the Project and requesting permissions from Shuswap Band for the application of their Indigenous knowledge sources. Table 7.3-1 presents the engagement activities with Shuswap Band since preparation of the provincial IPD and Engagement Plan. For earlier engagement with Shuswap Band, refer to Table 5 of the provincial Engagement Plan.

Table 7.3-1: Engagement with Shuswap Band about the Project since Preparation of the Initial Project Description

Date	Activity	Comments	Approach to Addressing
March 3, 2020	Teck received the Ethnographic Overview Study Regarding the Southeast Portion of Shuswap Band's Caretaker Area report from Shuswap Band	The report presents an overview of the occupation and land use, past and present, by Shuswap Band members and ancestors in the Elk Valley region.	Teck will continue to engage Shuswap Band on the Project and potential impacts.
March 4, 2020	Meeting on the provincial IPD and the Engagement Plan	Teck reviewed the provincial IPD and Engagement Plan. Shuswap Band shared interest in participating in cumulative effects initiatives, monitoring, emergency communication protocols and water quality (in particular selenium).	Teck met with Shuswap Band on April 14, 2020, (listed below) to further identify Shuswap Band interests in the Project.
April 14, 2020	Meeting with Teck providing an update on the Project	Shuswap Band shared their interest in VC selection, conducting a cultural site assessment and review of the terms of reference for the assessment of the Project.	Teck will continue to engage Shuswap Band through the assessment of the Project. Shuswap Band will prepare a work plan for Project engagement.
May 15, 2020	Follow-up email	Teck followed up with Shuswap Band on a Project engagement work plan.	
June 17, 2020	Follow-up email	Teck followed up with Shuswap Band on a Project engagement work plan.	
June 23, 2020	Email from Shuswap Band to BC EAO	Shuswap Band provided their notice of intent to participate in the assessment process under the BC EAA to the BC EAO.	Teck will work with Shuswap Band and the BC EAO (and now the IAAC) to identify and evaluate impacts of the Project on Shuswap Band's interests.
July 3, 2020	Letter from Shuswap Band to BC EAO	Shuswap Band affirmed their intent to participate in the assessment process under the BC EAA to the BC EAO. The letter included feedback on the Band's interests on the Project.	
September 30, 2020	Meeting and Project Update Presentation	Teck and Shuswap Band discussed further engagement needs around the Project and the process for working together.	Teck will continue to work with Shuswap Band on appropriate methods of engagement.
November 5, 2020	Letter from Shuswap Band to the IAAC	This letter provided feedback on the federal IPD.	Teck acknowledges the feedback provided and will continue to work to engage with Shuswap Band regarding the Project.
December 17, 2020	Meeting and Project and DPD Update Presentation	Teck and Shuswap Band discussed further engagement needs around the Project and the process for working together (via a work plan).	Teck will continue to work with Shuswap Band on appropriate methods of engagement.
January 8, 2021	Letter from Shuswap Band and table including comments on draft DPD	Shuswap Band provided comments on the draft DPD.	Teck acknowledges the feedback and will continue to work to engage with and address Shuswap Band's feedback on the Project. Teck has worked to address the draft DPD comments in the final version of the DPD and/or identify where comments may be addressed later in the regulatory process, as documented in the comment tracking database.
July 15, 2021	Shuswap Band/Teck Meeting, Kick-off Cultural Heritage Assessment work and provide Project update	Teck met with Shuswap Band to discuss next steps for advancing work related to the Cultural Heritage Assessment.	Teck will work with Shuswap Band in support of their Cultural Heritage Assessment.
July 29, 2021	Teck Informed Shuswap Band of DPD submission	Teck informed Shuswap Band of the DPD submission and the next steps in the assessment process on July 29, 2021.	Teck remains committed to continued engagement with communities and local Indigenous groups as the assessment moves forward in accordance with the requirements for engagement set by the IAAC and BC EAO.
August 3, 2021	Gender-Based Analysis Plus (GBA+) Memorandum	Teck provided Shuswap Band with the GBA+ memorandum that outlined GBA+ requirements and approach for the FRX regulatory process. Teck requested Shuswap Band review the memorandum and provide questions and comments.	Teck will work with Shuswap Band to advance this scope of work per Shuswap Band's preference.
August 5, 2021	Thank-you email from Shuswap Band	Shuswap Band thanked Teck for updating Shuswap Band on the submission of the DPD.	No further follow-up needed on this item.
October 5, 2021	Shuswap Band Site Visit	Teck provided Shuswap Band with a site tour of the Project area and addressed questions and comments.	Teck will continue to engage with Shuswap Band throughout the development of the Project.
October 14, 2021	Shuswap Band/Teck Meeting	Teck met with Shuswap Band to discuss Project updates, work plan progress, COVID-19 and a site tour debrief.	Teck will continue to engage with Shuswap Band throughout the development of the Project.
October 26, 2021	Plant and Wildlife List	Teck provided Shuswap Band with the draft plant and wildlife lists for the Project via email.	Teck will continue to share information with Shuswap Band throughout the development of the Project.
November 1, 2021	Plant and Wildlife List	Shuswap Band confirmed receipt of the draft plant and wildlife data via email.	
November 1, 2021	Information Requirements for Effects Assessment letter	Teck provided Shuswap Band with a letter seeking review and input into several aspects of Teck's assessment of potential effects on Indigenous interests. Teck requested a response by November 22, 2021.	Teck will continue to engage with Shuswap Band on the Indigenous Interests Assessment.
November 18, 2021	Shuswap Band/Teck Meeting	Teck met with Shuswap Band to discuss additional comments on the DPD, including Shuswap Band's preferred terminology for their name.	Teck will use Shuswap Band's preferred terminology for their name.
November 22, 2021	Shuswap Band response to Information Requirements for Effects Assessment letter	Shuswap Band provided Teck with a response to the Information Requirements for Effects Assessment letter.	Teck thanks Shuswap Band for their contribution and has reviewed the package.
November 25, 2021	Shuswap Band/Teck Meeting	Teck met with Shuswap Band to discuss work plan progress.	Teck will continue to engage with Shuswap Band throughout the development of the Project.
January 25, 2022	Shuswap Band/Teck Meeting	Teck met with Shuswap Band to discuss COVID-19, Project updates and work plan progress.	Teck will continue to engage with Shuswap Band throughout the development of the Project.
February 4, 2022	Impact Statement/Application information	Teck responded to Shuswap Band's email from November 22, 2021, and acknowledged Shuswap Band's response to the Information Requirements for Effects Assessment letter.	Teck will continue to engage with Shuswap Band throughout the development of the Project.
February 22, 2022	Shuswap Band/Teck Meeting	Teck met with Shuswap Band to discuss an approach to the Indigenous interests assessment, work plan progress and report timing.	Teck will continue to engage with Shuswap Band on the Indigenous Interests Assessment.
March 22, 2022	Shuswap Band/Teck Meeting	Teck met with Shuswap Band to discuss use of Indigenous knowledge, work plan progress and report timing.	Teck will continue to engage with Shuswap Band on the Indigenous Interests Assessment.
April 26, 2022	Shuswap Band/Teck Meeting	Teck met with Shuswap Band to discuss the Indigenous Interests section of the IS/A, use of Indigenous knowledge, the Readiness Decision and work plan progress. Shuswap Band also indicated they would be interested in a site visit.	Teck will continue to engage with Shuswap Band on the Indigenous Interests Assessment and will support a site visit.

Table 7.3-1: Engagement with Shuswap Band about the Project since Preparation of the Initial Project Description

Date	Activity	Comments	Approach to Addressing
April 27, 2022	Information Requirements for Effects Assessment letter	Teck provided Shuswap Band with the Information Requirements for Effects Assessment documents that were initially sent out to Shuswap Band in November 2021.	Teck will continue to work with Shuswap Band to share information to support Shuswap Band's interests in the assessment for the Project.
April 28, 2022	Draft approach to the Indigenous Interests section of the IS/A and for the use of Indigenous knowledge	Teck shared materials with Shuswap Band for review regarding the approach to the Indigenous Interests section of the IS/A and the use of Indigenous knowledge.	Teck will continue to work with Shuswap Band on the approach to the Indigenous Interests section of the IS/A and the use of Indigenous knowledge.
May 11, 2022	Online training portal for contractors	Shuswap Band asked Teck about the online training portal for contractors.	No further engagement required on this item.
May 12, 2022	Online training portal for contractors	Teck responded to Shuswap Band regarding the contractor training information.	
May 30, 2022	Human health receptor locations for the Human Health Risk Assessment of the Project	Teck provided Shuswap Band with the human health receptor locations for the Human Health Risk Assessment of the Project and requested Shuswap Band to review the information and provide feedback to Teck by June 30, 2022.	Teck will continue to work with Shuswap Band to share information to support the Shuswap Band interests in the assessment for the Project.
June 1, 2022	Shuswap Band Final Interests Report	Shuswap Band provided Teck with a final cultural heritage assessment report.	Teck appreciates the effort Shuswap Band put into developing this report.
June 30, 2022	Shuswap Band/Teck in-person meeting	Teck met with Shuswap Band in person to discuss a collaborative approach to the Indigenous Interests section of the IS/A and the use of Indigenous knowledge.	Teck will continue to work with Shuswap Band on the approach to the Indigenous Interests section of the IS/A and the use of Indigenous knowledge.
July 20, 2022	Teck Response to Shuswap Band Final Interests Report	Teck provided a response to Shuswap Band's Final Interests Report.	Teck will work with Shuswap Band to advance next steps on recommendations made in the Final Interests Report.
July 22, 2022	Shuswap Band/Teck Leadership Meeting	Teck leadership met with Shuswap Band leadership at the Vancouver Head Office.	Teck will continue to engage with Shuswap Band throughout the development of the Project.
August 3, 2022	EVWQP	Teck provided Shuswap Band with an update on the EVWQP.	Teck provided Shuswap Band with the report.
August 18, 2022	Shuswap Band/Teck Meeting	Teck met with Shuswap Band to discuss the Project and work plan progress.	Teck will continue to engage with Shuswap Band throughout the development of the Project.
August 25, 2022	Human Health Receptor Locations	Shuswap Band provided Teck with the human health receptor location suggestions requested by Teck from May 2022.	Teck will continue to engage with Shuswap Band throughout the development of the Project.
August 25, 2022	Teck Response to the Human Health Receptor Locations	Teck responded to Shuswap Band's August 8, 2022, email regarding the human health receptor locations.	Teck will continue to engage with Shuswap Band throughout the development of the Project.
September 27, 2022	Shuswap Band Site Tour	Teck hosted a tour with Shuswap Band via helicopter to see the Project area as well as a walkthrough of the Fording River Operations South Active Water Treatment Facility.	Teck will continue to engage with Shuswap Band throughout the development of the Project.
October 26, 2022	Draft Plant and Wildlife Lists	Teck provided Shuswap Band with the draft plant list and draft wildlife list.	Teck will continue to engage with Shuswap Band throughout the development of the Project.
November 30, 2022	Shuswap Band/Teck Meeting	Teck met with Shuswap Band to provide an overview of Teck's corporate polices, including nature positive, and to discuss Teck's efforts towards cumulative effects assessment.	Teck will continue to engage with Shuswap Band throughout the development of the Project.
February 2, 2023	Shuswap Band/Teck Meeting	Teck met with Shuswap Band to discuss Project updates across multiple sites.	Teck will continue to engage with Shuswap Band throughout the development of the Project.
March 30, 2023	Shuswap Band/Teck Meeting	Teck met with Shuswap Band to discuss Project updates and regional projects.	Teck will continue to engage with Shuswap Band on the Project and will work to advance identified action items.
May 15, 2023	Elk Valley Traditional Ecological Assessment Report	Shuswap Band provided Teck with the Elk Valley Traditional Ecological Assessment Report.	Teck will continue to engage with Shuswap Band on the Indigenous Interests Assessment.
May 15, 2023	Shuswap Band/Teck Workshop	Teck held a workshop with Shuswap Band focused on environmental assessment methods for Indigenous interests.	Teck will continue to engage with Shuswap Band on the Indigenous Interests Assessment.
July 31, 2023	Workshop Summary	Teck provided Shuswap Band with the final version of the workshop summary from the workshop in May 2023.	Teck will continue to engage with Shuswap Band on the Indigenous Interests Assessment.
August 15, 2023	Draft Workshop Plan	Teck provided Shuswap Band with a draft plan on a page for the October 2023 workshop.	Teck will continue to engage with Shuswap Band on the agenda for and approach to the workshop.
August 17, 2023	Shuswap Band/Teck Meeting	Teck met with Shuswap Band to discuss the October workshop and Indigenous Interests section of the IS/A.	Teck will continue to engage with Shuswap Band on the agenda for and approach to the workshop.
August 22, 2023	Workshop Plan Approval	Shuswap Band sent Teck contact information for a new Shuswap Band team member and reviewed and approved the plan on a page for the October 11, 2023, workshop.	Teck will continue to engage with Shuswap Band throughout the development of the Project.
August 22, 2023	Workshop logistics	Teck provided Shuswap Band with location logistics regarding the October 11, 2023, workshop.	Teck remains committed to supporting logistics for engagement with Shuswap Band.
August 22, 2023	Workshop logistics	Shuswap Band provided Teck with participation logistics regarding the October 11, 2023, workshop.	Teck remains committed to supporting logistics for engagement with Shuswap Band.
August 28, 2023	Workshop logistics	Shuswap Band inquired about the location for the October workshop.	Teck remains committed to supporting logistics for engagement with Shuswap Band.
August 28, 2023	Workshop logistics	Shuswap Band agreed to Teck's proposed alternative location for the October 11, 2023, workshop.	Teck remains committed to supporting logistics for engagement with Shuswap Band.
September 14, 2023	Shuswap Band/Teck Meeting	Teck met with Shuswap Band to discuss Project updates.	Teck will continue to engage with Shuswap Band throughout the development of the Project.
October 4, 2023	Workshop Materials	Teck provided Shuswap Band with the materials for the workshop and access to a SharePoint site.	Teck is committed to sharing timely and accurate information with Shuswap Band.
October 4, 2023	Workshop Agenda	Teck provided Shuswap Band with a shortened version of the agenda for the October 11, 2023, workshop.	Teck remains committed to supporting logistics for engagement with Shuswap Band.
October 11, 2023	Workshop	Teck held a workshop with Shuswap Band focused on Indigenous Interests Assessment methods.	Teck will continue to engage with Shuswap Band on the Indigenous Interests Assessment.
October 16, 2023	Table of Contents	Shuswap Band thanked Teck for the October 11, 2023, workshop and requested an update on their draft Indigenous Interests Chapter.	Teck will continue to engage with Shuswap Band on the Indigenous Interests Assessment.
October 23, 2023	Table of Contents	Teck confirmed that it would provide an update along with the workshop summary.	Teck will continue to engage with Shuswap Band on the action items listed.
October 26, 2023	Workshop summary	Teck provided Shuswap Band with a summary of the October 11, 2023, workshop, an update on their chapter and information about the EMC public meeting on November 7, 2023.	Teck will continue to engage with Shuswap Band throughout the development of the Project.

Table 7.3-1: Engagement with Shuswap Band about the Project since Preparation of the Initial Project Description

Date	Activity	Comments	Approach to Addressing
October 31, 2023	Annual Water Quality Open House	Teck invited Shuswap Band to their Annual Water Quality Open House on November 15.	Teck will continue to engage with Shuswap Band throughout the development of the Project.
November 7, 2023	Draft Existing Conditions Reports	Teck provided Shuswap Band with the draft Wildlife, Noise, Light and Visual Aesthetics existing conditions reports via SharePoint and provided a meeting agenda.	Teck will continue to share existing conditions reports with Shuswap Band.
November 7, 2023	Meeting Agenda	Shuswap Band thanked Teck for sharing the November 9, 2023, meeting agenda.	Teck will continue to engage with Shuswap Band throughout the development of the Project.
November 8, 2023	Workshop Summary Comments	Shuswap Band provided comments on the October workshop summary.	Teck updated the October workshop summary with Shuswap Band's edits and shared the updated version.
November 9, 2023	Workshop Summary Comments	Teck confirmed that it will make edits to the October workshop summary and share an updated version.	
November 9, 2023	Shuswap Band/Teck Meeting	Teck met with Shuswap Band to discuss Project updates.	Teck will continue to engage with Shuswap Band throughout the development of the Project.
November 20, 2023	Sale News	Teck provided Shuswap Band with information about the sale of the steelmaking coal business.	Teck will continue to engage with Shuswap Band throughout the development of the Project.
November 24, 2023	Water Quality Management	Shuswap Band requested information about water quality management for the Project.	Teck provided an update and will continue to engage with Shuswap Band on this topic.
December 7, 2023	Shuswap Band/Teck Meeting	Teck met with Shuswap Band to discuss Project updates.	Teck will continue to engage with Shuswap Band throughout the development of the Project.
December 7, 2023	Presentation Slides	Teck provided Shuswap Band with the December 7, 2023, meeting presentation slides.	Teck is committed to sharing timely and accurate information with Shuswap Band.
December 7, 2023	Workshop Dates	Teck inquired with Shuswap Band about available dates for a February 2024 workshop.	Teck remains committed to supporting logistics for engagement with Shuswap Band.
December 19, 2023	Year End Appreciation	Teck expressed appreciation to Shuswap Band for the engagement completed in 2023.	Teck will continue to engage with Shuswap Band throughout the development of the Project.
January 2, 2024	Existing Conditions Reports	Teck informed Shuswap Band that a few more existing conditions reports were added to the shared SharePoint site.	Teck will continue to engage with Shuswap Band on the FRX assessment.
January 9, 2024	Shuswap Band/Teck Meeting	Teck met with Shuswap Band to discuss FRX Project updates including water quality management.	Teck will continue to engage with Shuswap Band through the development of the Project.
January 12, 2024	Chapters for Review	Shuswap Band asked Teck about the corresponding chapters for review in the SharePoint folder.	Teck will continue to engage with Shuswap Band on the Indigenous Interests Assessment.
January 12, 2024	Chapter Revisions	Shuswap Band indicated they were using the SharePoint document to make revisions.	Teck will continue to engage with Shuswap Band on the Indigenous Interests Assessment.
January 17, 2024	FRX 2024 Exploration Drilling	Shuswap Band asked Teck to share the proposal for heli-drilling at the FRX site in order for Shuswap Band to get their comments in by January 25, 2024.	Teck is committed to sharing timely and accurate information with Shuswap Band.
January 18, 2024	FRX 2024 Exploration Drilling	Teck informed Shuswap Band that documents had been added into the shared SharePoint folder called 2024 Notice of Work application, in response to Shuswap Band's request for the heli-drilling exploration proposal.	Teck will continue to engage with Shuswap Band on the FRX assessment.
January 22, 2024	Meeting Logistics	Shuswap Band inquired with Teck regarding the February 1, 2024, meeting invitation.	Teck remains committed to supporting logistics for engagement with Shuswap Band.
January 22, 2024	Plan on a Page Feedback	Teck let Shuswap Band know the timeline for when the plan on a page feedback would be needed.	Teck will continue to engage with Shuswap Band on the FRX assessment.
January 29, 2024	Workshop Agenda	Shuswap Band confirmed with Teck that they were pleased with the agenda and requested confirmation of the venue in Cranbrook.	Teck remains committed to supporting logistics for engagement with Shuswap Band.
January 29, 2024	Workshop Venue	Teck confirmed the venue location for the February 21, 2024, workshop in Cranbrook.	Teck remains committed to supporting logistics for engagement with Shuswap Band.
January 29, 2024	FRX Heli-Drilling Exploration	Shuswap Band sent Teck a request to add the topic of FRX heli-drilling exploration to the February 1, 2024, check-in meeting agenda.	Teck confirmed with Shuswap Band that it would add the topic of FRX heli-drilling exploration to the Teck Shuswap Band February 1, 2024, check-in meeting agenda.
February 1, 2024	Shuswap Band/Teck Meeting	Teck met with Shuswap Band to discuss Project updates including the 2024 Notice of Work.	Teck will continue to engage with Shuswap Band through the development of the Project.
February 14, 2024	Shuswap Band Indigenous Interests Chapter	Shuswap Band provided Teck with an updated draft Indigenous Interests Chapter.	Teck reviewed the document and discussed it with Shuswap Band at the February 21, 2024, workshop.
February 21, 2024	Shuswap Band/Teck Workshop	Teck and Shuswap Band held an FRX workshop in Cranbrook.	Teck will continue to engage with Shuswap Band through the development of the Project.
March 4, 2024	New Existing Conditions Reports	Teck informed Shuswap Band that new existing conditions reports had been added into the SharePoint.	Teck is committed to sharing timely and accurate information with Shuswap Band.
March 12, 2024	Shuswap Band/Teck Meeting	Shuswap Band informed Teck of the members that would participate on the March 28, 2024, meeting and provided a list of topics that they would like to cover.	Teck will continue to engage with Shuswap Band throughout the development of the Project.
March 26, 2024	Shuswap Band/Teck Site Tour	Teck proposed site tour dates in June for Shuswap Band.	Teck will continue to support logistics for a site visit in 2024.
April 8, 2024	Workshop Summary	Teck provided Shuswap Band with the February 21 workshop summary.	Teck will continue to engage with Shuswap Band on the FRX assessment.
April 26, 2024	Shuswap Band/Teck Meeting	Teck met with Shuswap Band for an FRX Project update and to discuss regional projects.	Teck will continue to engage with Shuswap Band on the FRX assessment.
May 24, 2024	Shuswap Band/Teck Meeting	Teck met with Shuswap Band for check-in meeting to discuss company separation updates, the regulatory timeline, and the role of the Shuswap Guardians.	Teck will continue to engage with Shuswap Band throughout the development of the Project and is committed to connecting with Shuswap Guardians to understand the types of opportunities they are interested in (email introduction was sent on May 27, 2024).
May 27, 2024	Shuswap Guardians/Teck Introduction	Teck contacted Shuswap Band to set up a meeting to discuss the type of work the Shuswap Guardian's are interested in.	Teck subsequently met with the Guardian Manager and Territorial Stewardship Director on June 17, 2024.
June 4, 2024	Map Files	Shuswap Band requested map files from Teck.	Teck provided Shuswap Band with the files they had requested on June 4, 2024.
June 17, 2024	Shuswap Band/Teck Meeting	Teck met with Shuswap Band's Territorial Stewardship Director and Guardians Manager to learn about the Guardians program.	Teck will continue to engage with Shuswap Band on the Project and will work to advance identified action items.
July 8, 2024	Glencore Acquisition	Teck announced to Shuswap Band that the acquisition of EVR by Glencore was approved by the federal government.	Teck will continue to engage with Shuswap Band on the Project and will work to advance identified action items.

Table 7.3-1: Engagement with Shuswap Band about the Project since Preparation of the Initial Project Description

Date	Activity	Comments	Approach to Addressing
July 18, 2024	Shuswap Band/EVR Meeting	EVR met with Shuswap Band for a regular monthly meeting to the 2025 Notice of Work for exploration drilling at the FRX Project area.	EVR will continue to engage with Shuswap Band on the Project and will work to advance identified action items.
August 7–8, 2024	Shuswap Band Site Visit	Shuswap Band visited the Elk Valley for a two-day site visit focused on future exploration and reclamation.	EVR will continue to engage with Shuswap Band through the development of the Project.
August 29, 2024	Shuswap Band/EVR Meeting	EVR met with Shuswap Band for a monthly meeting to discuss the 2025 Notice of Work for exploration drilling at FRX.	EVR will continue to engage with Shuswap Band on the Project and will work to advance identified action items.
September 10, 2024	Meeting Agenda	EVR emailed Shuswap Band a proposed agenda for the meeting on September 12, 2024.	EVR will continue to engage with Shuswap Band on the Project and will work to advance identified action items.
September 12, 2024	Shuswap Band/EVR Meeting	EVR met with Shuswap Band for a monthly meeting to discuss community and Project updates, Cougar 5 and Harmer Dam.	EVR will continue to engage with Shuswap Band on the Project and will work to advance identified action items.
October 2, 2024	Compliance-related Reports	EVR shared with Shuswap Band archaeology, water quality, and additional compliance-related reports.	EVR will continue to engage with Shuswap Band on the FRX assessment.
October 10, 2024	Shuswap Band/EVR Meeting	EVR met with Shuswap Band to the FRX Project regulatory schedule	EVR will continue to engage with Shuswap Band on the FRX assessment.
October 22, 2024	Existing Conditions report and October 2024 Application Summary	EVR provided the Existing Conditions report and shared the October 2024 Application Summary Table with Shuswap Band for review.	EVR is committed to sharing timely and accurate information with Shuswap Band.
November 5, 2024	Agenda for Shuswap Band/EVR Meeting	EVR emailed Shuswap Band to request agenda items for the upcoming December 5, 2024, meeting.	EVR will continue to engage with Shuswap Band throughout the development of the Project.
November 7, 2024	Shuswap Band/EVR Monthly Meeting	EVR held a regular monthly check-in Shuswap Band to discuss community and Project updates.	EVR will continue to engage with Shuswap Band throughout the development of the Project.
November 20, 2024	Application Summary and Agenda	EVR emailed Shuswap Band the November 2024 Application Summary Table and shared details about the December 5, 2024, meeting, asking if Shuswap had any agenda items to add.	EVR is committed to sharing timely and accurate information with Shuswap Band.
December 5, 2024	Shuswap Band/EVR Meeting	EVR held its monthly meeting with Shuswap Band to share Project updates.	EVR will continue to engage with Shuswap Band throughout the development of the Project.
January 30, 2025	Shuswap Band/EVR Meeting	EVR met with Shuswap Band for a monthly meeting to discuss project updates, community updates, and regional items of interest.	EVR will continue to engage with Shuswap Band throughout the Project.
February 27, 2025	Archaeology Question	EVR responded to Shuswap Band's archaeology questions on shovel test areas, future excavations, and carbon dating artifacts.	EVR will continue to engage with Shuswap Band throughout the Project.
February 27, 2025	Shuswap Band/EVR Meeting	EVR met with Shuswap Band for a monthly meeting to discuss project updates, community updates, and regional items of interest.	EVR will continue to engage with Shuswap Band throughout the Project.
March 6, 2025	Shuswap Band/EVR Meeting	EVR met with Shuswap Band to discuss current state of agreement negotiations and next steps.	EVR will continue to engage with Shuswap Band throughout the Project.
March 11, 2025	Guardians Opportunity	EVR contacted the Shuswap Band Guardians Manager to provide information about an opportunity for their Guardians Program related to FRX.	EVR continues to look for opportunities to include Shuswap Guardians in aspects of the Project.
March 27, 2025	Shuswap Band/EVR Meeting	EVR met with Shuswap Band for a monthly meeting to discuss project updates, community updates, and regional items of interest.	EVR will continue to engage with Shuswap Band throughout the Project.
April 11, 2025	Wildlife Report	Shuswap asked EVR to provide the Wildlife Existing Conditions Characterization Report.	EVR shared the report via SharePoint with Shuswap Band on April 24, 2025.
April 24, 2025	Shuswap Band/EVR Revised DPD Update Meeting	EVR met with Shuswap Band for a monthly meeting to provide an update on the changes in the Revised DPD and confirm details for a September 2025 workshop.	EVR remains committed to providing timely information to Shuswap Band throughout the development of the Project.
April 29, 2025	Coordination of Workplan Meeting	EVR contacted Shuswap Band to set up a meeting to discuss work plans and capacity funding.	EVR will work with Shuswap Band to schedule this meeting in May 2025.
May 14, 2025	Revised Detailed Project Description Presentation	EVR shared the revised DPD presentation with Shuswap Band.	EVR will continue to engage with Shuswap Band throughout the development of the Project.
June 19, 2025	EVR/Shuswap Band Meeting	EVR met with Shuswap to provide an update on the pending revised DPD submission.	EVR will continue to engage with Shuswap Band throughout the development of the Project.

Note: In July 2024, Teck Coal Limited (Teck) changed its name to EVR Operations Limited (EVR); refer to Section 1.2.1 for details.

BC EAO= British Columbia Environmental Assessment Office; IPD = Initial Project Description; DPD = Detailed Project Description; GBA+ = Gender-Based Analysis Plus; IS/A = Impact Statement/Application; EVWQP = Elk Valley Water Quality Plan; EMC = Environmental Monitoring Committee; VC = valued component; BC EAA = British Columbia *Environmental Assessment Act*; IAAC = Impact Assessment Agency of Canada; FRX = Fording River Extension; FRO = Fording River Operations; EVR = EVR Operations Limited; COVID-19 = Coronavirus Disease 2019.

Based on engagement to date, preliminary interests and concerns identified by Shuswap Band are related to:

- Shuswap Band's role of Yecwmenul'ecem, or "taking care of the land," and keeping ecological balance intact
- access to areas of key cultural and spiritual significance (e.g., trails, travel corridors, waterways, mountains and burial sites)
- plants and wildlife species of cultural importance (e.g., Labrador tea, soapberry, glacier lilies, Devil's club, willow, Canby lovage, deer, elk, moose, bighorn sheep, grizzly and black bear, and fur-bearers)
- resource development impacts on the transmission of Indigenous knowledge and practices across generations
- recorded and unrecorded archaeological sites and artifacts, including interest in participating in archaeological work and reviewing archaeology reports
- cultural and traditional use of lands and resources for traditional purposes, subsistence harvesting and health (e.g., from changes to surface and groundwater quality, traffic and habitat effects)
- water quality to support consumption and use by other resources, including fish and fish habitat, especially WCT, in the Elk Valley in general and in the Elk and White[22] river watersheds
- air quality and noise impacts
- soils and terrain, including soil quality
- socio-economic effects, including employment and economic opportunities
- data collection and study participation (e.g., archaeological work, water quality and fish monitoring)
- cumulative effects and incorporation of a broader perspective on regional effects
- incorporating a holistic worldview in the assessment method, including VCs and the determination of potential effects
- efficacy and demonstrability of mitigation measures

For more detail on preliminary interests identified by Shuswap Band during early engagement, and Teck's (now EVR's) responses, refer to Appendix A.

Table 7.3-2 presents engagement activities EVR plans to undertake with Shuswap Band to support the assessment process.

Table 7.3-2: Planned Engagement with Shuswap Band

Item #	Activity
1	Meet with Shuswap Band to continue a collaborative approach for the assessment of potential effects of the Project on Shuswap Band's rights and interests and to support a collaborative approach to the development of an IS/A that is informed by both Shuswap knowledge and western science.

IS/A = Impact Statement/Application

22 EVR notes that the White River converges with the Kootenay River northeast of Canal Flats (approximately 178 km upstream of the confluence of the Elk River with the Kootenay River).

The Memorandum of Understanding dated 2015 between Shuswap Band and EVR (formerly Teck) established a basis for cooperative work between EVR and Shuswap Band.

EVR (formerly Teck) entered into an agreement with Shuswap Band in June 2021 to facilitate engagement and the collection of data to support the identification of Shuswap Band interests related to the Project.

7.4 Stoney Nakoda Nations

The Stoney Nakoda Nations, also known as the *Iyarhe Nakoda* or “people of the mountains” in the Nakoda language, are made up of three Stoney Nakoda Nations (Stoney Nakoda Nations 2021b) - Bearspaw First Nation, Chiniki First Nation and Goodstoney First Nation (Stoney Nakoda Nations 2022) - all of whom have unique cultural and linguistic traits (Stoney Nakoda Nations 2021b). The Stoney Nakoda Nations are a signatory of the Blackfoot Treaty of 1877 (No. 7), which covers an area from the BC border to the west, the US border to the south, Cypress Hills to the east and the Red Deer River to the north. The community resides on four reserves: Big Horn 144 A, Eden Valley 216, Stoney 142-143-144 and Stoney 142 B. The proximity of Stoney Nakoda reserves to the Project is presented in Figure 5.1-3.

The Stoney Nakoda Nations’ Traditional Territory is in southern Alberta, encompassing the BC Interior to the west, Jasper National Park in the north, Cypress Hills to the east and Glacier National Park to the south (Stoney Nakoda Nations 2021a). The Stoney Nakoda Nations asserted Rights and Title in southeastern BC through a Supreme Court of British Columbia Writ of Summons filed in 2004. The Stoney Nakoda Nations have stated that the Project is located in an important cultural landscape used for the exercise of their rights and is within an area associated with hunting, harvesting, ceremonial and sacred sites, and other cultural practices (Stoney Nakoda Nations 2021b). Stoney Tribal Council represents the three member Indigenous nations, each of which have elected their separate respective Chief and four Councillors (Stoney Nakoda Nations 2022).

Teck (now EVR) began engaging with the Stoney Nakoda Nations about the Project in fall 2019. Teck notified the Stoney Nakoda Nations about the Project and hosted a Project introduction meeting in spring 2020. EVR acknowledges that the Stoney Nakoda Nations have existing Indigenous knowledge and traditional land use information that may be relevant for the Project. EVR is committed to engaging on the applicability of any existing studies or information to the Project and requesting permissions from the Stoney Nakoda Nations for the application of their Indigenous knowledge sources.

Table 7.4-1 presents the engagement activities with the Stoney Nakoda Nations since preparation of the provincial IPD and Engagement Plan. For earlier engagement with the Stoney Nakoda Nations, refer to Table 8 of the Engagement Plan.

Table 7.4-1: Engagement with the Stoney Nakoda Nations about the Project since Preparation of the Initial Project Description

Date	Activity	Comments	Approach to Addressing
March 2, 2020	1895 Memorandum of Agreement	The Stoney Nakoda Nations provided Teck with an 1895 Memorandum of Agreement with Shuswap Band via email.	Teck acknowledges the Memorandum of Agreement provided.
March 2, 2020	Stoney Nakoda Nations/Teck Introductory Meeting	Teck introduced the Project (IPD) to the Stoney Nakoda Nations.	Teck will work with the Stoney Nakoda Nations to identify and evaluate potential impacts of the Project on the Stoney Nakoda Nations' interests.
April 8, 2020	Teck provided an update on the Project.	The Stoney Nakoda Nations confirmed their interest in completing a cultural assessment, socio-economic participation, conducting a site tour and providing cultural awareness training.	Follow-up meeting scheduled for future engagement discussion and potential site visit.
June 8, 2020	Stoney Nakoda Nations Letter to the BC EAO	The Stoney Nakoda Nations provided their notice of intent to participate in the assessment process under the BC EAA to the BC EAO.	Teck will work with the Stoney Nakoda Nations and the BC EAO (and now the IAAC) to identify and evaluate impacts of the Project on Stoney Nakoda Nation's interests.
December 16, 2020	Stoney Nakoda Nations Letter to the BC EAO	Feedback provided by the Stoney Nakoda Nations on the provincial IPD via a letter and comment response table.	Teck acknowledges feedback provided and will continue to work with the Stoney Nakoda Nations to evaluate potential impacts of the Project on Stoney Nakoda Nation's interests.
January 28, 2021	Stoney Nakoda Nations Letter to the IAAC.	Feedback provided on the federal IPD.	Teck acknowledges the Statement of Claim provided by the Stoney Nakoda Nations and will continue to work to engage the Stoney Nakoda Nations in an appropriate manner.
March 25, 2021	Stoney Nakoda Nations/Teck email exchange	Teck and the Stoney Nakoda Nations corresponded via email to discuss further engagement needs around the Project and the process for working together (via a work plan).	Teck will continue to work with the Stoney Nakoda Nations on the appropriate methods of engagement.
April 19, 2021	Stoney Nakoda Nations/Teck email exchange	Teck and the Stoney Nakoda Nations corresponded via email on the timing of the proposed work plan.	Teck will continue to work with the Stoney Nakoda Nations on the appropriate methods of engagement.
May 14, 2021	Stoney Nakoda Nations/Teck email exchange	Teck and the Stoney Nakoda Nations corresponded via email on the timing of the proposed work plan and a site tour.	Teck reached out to the Stoney Nakoda Nations via email to set up a meeting to discuss next steps to advance the work plan and site visit.
July 7, 2021	Stoney Nakoda Nations/Teck email exchange	Teck reached out to the Stoney Nakoda Nations via email to set up a meeting to discuss next steps to advance the work plan and site visit.	Teck will continue to work with the Stoney Nakoda Nations on the appropriate methods of engagement.
July 20, 2021	Site Visit Logistics	Teck and the Stoney Nakoda Nations connected via email on the logistics required to support a site visit.	Teck remains committed to working with the Stoney Nakoda Nations on this Project and facilitating logistics for site visits.
July 29, 2021	Teck informed Stoney Nakoda Nations of DPD submission	Teck informed the Stoney Nakoda Nations that the DPD had been submitted and explained the following steps of the assessment process for the Project.	Teck expressed its commitment to continued engagement with communities and potentially affected Indigenous Peoples as the assessment moves forward in accordance with the requirements for engagement set by the IAAC and BC EAO.
August 11, 2021	Technical Advisors Meeting Technical advisors meeting for the Readiness Decision Phase	IAAC and BC EAO technical advisors met to discuss the Readiness Decision Phase. The agenda included FRX Project overview, Project Q&A, coordinated assessment process, assessment process Q&A, closing and next steps.	Teck expressed its commitment to continued engagement with communities and potentially affected Indigenous Peoples as the assessment moves forward in accordance with the requirements for engagement set by the IAAC and BC EAO.
August 12, 2021	Stoney Nakoda Nations Site Tour	Teck provided the Stoney Nakoda Nations Morley community members with a site tour of the Project area and addressed questions and comments.	Teck will follow up with the Stoney Nakoda Nations to see if they have further feedback following the site tour.
August 19, 2021	Stoney Nakoda Nations Site Tour	Teck provided the Stoney Nakoda Nations Bearspaw and Chiniki community members with a site tour of the Project area and addressed questions and comments.	Teck will follow up with the Stoney Nakoda Nations to see if they have further feedback following the site tour.
September 1, 2021	Stoney Nakoda Nations Site Tour	Teck provided the Stoney Nakoda Nations Bighorn community members with a site tour of the Project area and addressed questions and comments.	Teck followed up with the Stoney Nakoda Nations to see if they had further feedback following the site tour.
September 2, 2021	Meeting Request	Teck followed up with the Stoney Nakoda Nations via email to request a meeting to debrief on the site visits.	Teck will continue to reach out to the Stoney Nakoda Nations to make opportunities for engagement on the Project available.
September 8, 2021	Meeting Request	Teck followed up with the Stoney Nakoda Nations for a check-in meeting and indicated September 15, 2021.	Teck will continue to reach out to the Stoney Nakoda Nations to make opportunities for engagement on the Project available.
September 16, 2021	Meeting Request	Teck followed up with the Stoney Nakoda Nations on the September 8, 2021, email requesting a meeting to debrief on the tours and discuss next steps.	Teck will continue to reach out to the Stoney Nakoda Nations to make opportunities for engagement on the Project available.
October 29, 2021	Information Requirements for Effects Assessment letter	Teck provided the Stoney Nakoda Nations with a letter seeking review and input into several aspects of Teck's assessment of potential effects on Indigenous interests.	Teck will continue to work with the Stoney Nakoda Nations to seek input on the assessment of potential effects on the Stoney Nakoda Nations' interests. Teck received feedback on the Information Requirements for Effects Assessment letter throughout 2022 during meetings and emails.
November 22, 2021	Stoney Nakoda Nations/Teck Meeting	Teck met with the Stoney Nakoda Nations to discuss feedback on the site tours and future site visits for cultural practices.	The Stoney Nakoda Nations indicated they would provide feedback on the site tours via a preliminary report. Teck will await feedback from the Stoney Nakoda Nations and then reach out to discuss next steps.
November 30, 2021	Meeting Request	Teck sent an email to the Stoney Nakoda Nations to request a follow-up meeting to discuss schedule and work plan development.	Teck will continue to reach out to the Stoney Nakoda Nations to make opportunities for engagement on the Project available.
December 2, 2021	Shapefiles of the Project footprint	The Stoney Nakoda Nations requested the shapefiles of the Project footprint.	Teck followed up by email on December 6, 2021 (see below).
December 6, 2021	Shapefiles of the Project footprint	Teck provided the Stoney Nakoda Nations with the Project footprint files via email as requested.	No further engagement required on this item.
January 10, 2022	Email follow-up	Teck followed up with the Stoney Nakoda Nations regarding the Indigenous interests information request letter and potential meeting. Teck proposed January 13, 2022, as a meeting time.	Teck will continue to reach out to the Stoney Nakoda Nations to make opportunities for engagement on the Project available.

Table 7.4-1: Engagement with the Stoney Nakoda Nations about the Project since Preparation of the Initial Project Description

Date	Activity	Comments	Approach to Addressing
January 24, 2022	Phone call with Stoney Nakoda Nations Consultant	Teck had a call with the Stoney Nakoda Nations' consultant to discuss next steps. The consultant requested the Information Requirements for Effects Assessment letter be re-sent.	Teck re-sent the Information Requirements for the Effects Assessment letter (see below).
January 24, 2022	Follow-up on Information Requirements for Effects Assessment	Teck sent the Stoney Nakoda Nations a follow-up email to the January 24, 2022, call and provided the Information Requirements for Effects Assessment letter.	Teck continued to seek feedback from the Stoney Nakoda Nations on the Information Requirements for Effects Assessment letter.
March 1, 2022	Follow-up on Information Requirements for Effects Assessment letter and preliminary report	Teck reached out to the Stoney Nakoda Nations via email to request an update on the preliminary report and on the Information Requirements for Effects Assessment letter sent on October 29, 2022.	Teck continued to seek feedback from the Stoney Nakoda Nations on the Information Requirements for Effects Assessment letter.
March 28, 2022	Meeting Request	Teck followed up with the Stoney Nakoda Nations after the March 1, 2022, email requesting a meeting.	Teck will continue to reach out to the Stoney Nakoda Nations to make opportunities for engagement on the Project available.
April 26, 2022	Meeting Request	Teck followed up with the Stoney Nakoda Nations after the March 28, 2022, email requesting a meeting.	Teck will continue to reach out to the Stoney Nakoda Nations to make opportunities for engagement on the Project available.
May 4, 2022	Meeting Request	Teck followed up with the Stoney Nakoda Nations requesting an in person meeting on the week of May 26, 2022.	Teck will continue to reach out to the Stoney Nakoda Nations to make opportunities for engagement on the Project available.
May 26, 2022	Informal In-Person Meeting	Teck met with the Stoney Nakoda Nations in person to informally discuss the Project and outstanding items Teck would like to move forward on, including a work plan.	Teck sent meeting date options for the Stoney Nakoda Nations' consideration on May 30, 2022 (see below).
May 30, 2022	Meeting request	Teck followed up with the Stoney Nakoda Nations after the informal meeting on May 26 to discuss next steps. Teck provided some meeting date options for the Stoney Nakoda Nations' consideration.	Teck will continue to reach out to the Stoney Nakoda Nations to make opportunities for engagement on the Project available.
May 30, 2022	Human Health Receptor Locations for the Human Health Risk Assessment of the Project	Teck provided the Stoney Nakoda Nations with the human health receptor locations for the Human Health Risk Assessment of the Project and requested the Stoney Nakoda Nations to review the information and provide feedback to Teck by June 30, 2022.	Teck will continue to work with the Stoney Nakoda Nations to share information to support the Stoney Nakoda Nation interests in the assessment for the Project.
June 1, 2022	Stoney Nakoda Nations follow-up email	The Stoney Nakoda Nations responded to Teck via email that they would get back to Teck on preferred dates for a meeting	Teck set up a meeting once a date was confirmed by the Stoney Nakoda Nations (June 10, 2022).
June 10, 2022	Teck follow-up email	Teck responded to the Stoney Nakoda Nations on the proposed follow-up meeting and referred to a draft placeholder meeting for the morning of June 20, 2022, including some suggested topic areas. Teck asked if that time worked for the Stoney Nakoda Nations.	Teck will continue to work with the Stoney Nakoda Nations and will set up meetings on specific topics of interest for Stoney Nakoda Nation if requested.
July 11, 2022	Stoney Nakoda Nations/Teck In-Person Meeting	Teck met with the Stoney Nakoda Nations to discuss environmental topics and the regulatory process.	Teck followed up with the Stoney Nakoda Nations on next steps as requested in the meeting (July 19, 2022).
July 19, 2022	Teck follow-up email	Teck followed up with the Stoney Nakoda Nations via email to resend the Indigenous interests information request letter and outline next steps.	Teck continued to seek feedback from the Stoney Nakoda Nations on the Indigenous interests information request letter.
August 3, 2022	EVWQP Update	Teck provided the Stoney Nakoda Nations with an update on the EVWQP.	Teck will continue to engage with the Stoney Nakoda Nations throughout the development of the Project.
August 18, 2022	Stoney Culture Camp	Teck participated in a Stoney Culture Camp to gain a better understanding of community interests.	Teck will continue to engage with the Stoney Nakoda Nations throughout the development of the Project.
October 14, 2022	FRX Assessment Sources	Teck provided the Stoney Nakoda Nations with a list of secondary sources for the FRX assessment for Stoney Nakoda Nation's review and approval.	Teck will continue to engage with the Stoney Nakoda Nations on the Indigenous Interests Assessment.
January 31, 2023	Preliminary Project Tour Summary	Teck provided the Stoney Nakoda Nations with a formal response in acknowledgement of the Stoney Nakoda Nation Preliminary Project Tour Summary for FRX.	Teck will continue to engage with the Stoney Nakoda Nations throughout the development of the Project.
March 3, 2023	Participation Support	Teck provided information about participation and a sample work plan to the Stoney Nakoda Nations.	Teck will continue to work with the Stoney Nakoda Nations to support their participation in the Project.
March 6, 2023	Participation Support	Teck provided additional information to the Stoney Nakoda Nations about participation support.	
March 8, 2023	Participation Support	The Stoney Nakoda Nations indicated their preferences for participation support.	
March 13, 2023	Participation Support	Teck responded to the Stoney Nakoda Nations' preference.	
March 14, 2023	Project Meeting	Teck provided the Stoney Nakoda Nations meeting time options to continue Project discussions.	Teck will continue to reach out to the Stoney Nakoda Nations to make opportunities for engagement on the Project available.
March 14, 2023	Project Meeting	The Stoney Nakoda Nations confirmed a meeting time with Teck.	
March 15, 2023	Project Meeting	Teck emailed the Stoney Nakoda Nations to provide a summary of meeting topics.	
April 13, 2023	Project Information	Teck provided the Stoney Nakoda Nations additional Project information.	Teck is committed to sharing timely and accurate information with the Stoney Nakoda Nations.
April 19, 2023	Cultural Assessment Work	Teck expressed optimism that the proposed cultural assessment work could be advanced and proposed a meeting.	Teck will continue to engage with the Stoney Nakoda Nations on the cultural assessment work.
May 23, 2023	Stoney Nakoda Nations Teck In-Person Meeting	Teck provided the Stoney Nakoda Nations with Project introductions and discussed proposed cultural assessment work.	Teck will continue to engage with the Stoney Nakoda Nations on the cultural assessment work.
May 24, 2023	Participation Support	Teck provided the Stoney Nakoda Nations with a Project overview and proposal for participation support.	Teck will continue to work with the Stoney Nakoda Nations to support their participation in the Project.

Table 7.4-1: Engagement with the Stoney Nakoda Nations about the Project since Preparation of the Initial Project Description

Date	Activity	Comments	Approach to Addressing
September 11, 2023	Meeting Request	Teck provided the Stoney Nakoda Nations with an email update offering to support a fieldwork visit or meeting in late fall.	Teck will continue to work with the Stoney Nakoda Nations to support their participation in the Project.
October 4, 2023	Request for Participation Support	The Stoney Nakoda Nations provided Teck with a request for support to participate in the FRX Project.	Teck will continue to work with the Stoney Nakoda Nations to support their participation in the Project.
October 18, 2023	Stoney Nakoda Nations/Teck Meeting	Teck met with the Stoney Nakoda Nations to discuss participation and engagement on the Project.	Teck will continue to engage with the Stoney Nakoda Nations throughout the development of the Project.
October 19, 2023	Teck Documents	Teck provided the Stoney Nakoda Nations with additional information following the October 18 meeting.	Teck will continue to engage with the Stoney Nakoda Nations throughout the development of the Project.
October 19, 2023	Land Ownership	The Stoney Nakoda Nations inquired about land ownership near the Project.	Teck is committed to sharing timely and accurate information with the Stoney Nakoda Nations.
October 23, 2023	Land ownership	Teck responded to the Stoney Nakoda Nations' request about land ownership.	
October 26, 2023	Updated map	Teck provided an updated map of FRO.	
October 26, 2023	Participation Support	Teck provided the Stoney Nakoda Nations with information outlining participation support.	Teck will continue to work with the Stoney Nakoda Nations to support their participation in the Project.
October 27, 2023	Participation Support	The Stoney Nakoda Nations acknowledged the information shared and informed Teck they would review it.	
October 31, 2023	Annual Water Quality Open House	Teck invited the Stoney Nakoda Nations to attend the Annual Water Quality Open House.	Teck will continue to engage with the Stoney Nakoda Nations throughout the development of the Project.
November 20, 2023	Sale News	Teck provided the Stoney Nakoda Nations with information about the sale of the steelmaking coal business.	Teck will continue to engage with the Stoney Nakoda Nations throughout the development of the Project.
December 19, 2023	Year End Appreciation	Teck expressed appreciation to the Stoney Nakoda Nations for the engagement completed during 2023.	Teck will continue to engage with the Stoney Nakoda Nations throughout the development of the Project.
February 1, 2024	Sale News	Teck provided the Stoney Nakoda Nations with information about the sale of the steelmaking coal business.	Teck will continue to engage with the Stoney Nakoda Nations throughout the development of the Project.
February 9, 2024	Budget for the proposed Stoney Consultation TLU Study	The Stoney Nakoda Nations provided Teck with a letter and budget for the proposed Stoney Consultation TLU study for the FRX Project.	Teck will continue to work with the Stoney Nakoda Nations to support their participation in the Project.
February 12, 2024	Stoney Nakoda Nations/Teck In-person Meeting	Teck informed the Stoney Nakoda Nations that it would be in Calgary at the end of February and proposed to meet in person.	Teck will continue to work with the Stoney Nakoda Nations to support their participation in the Project.
March 11, 2024	Stoney Nakoda Nations/Teck Meeting	Teck connected with the Stoney Nakoda Nations to align on availability for their next meeting.	Teck remains committed to supporting logistics for engagement with the Stoney Nakoda Nations.
May 2, 2024	Stoney Nakoda Nations/Teck Phone Call	Teck spoke with the Stoney Nakoda Nations over the phone to discuss edits to the participation support.	Teck modified the agreement to meet the Stoney Nakoda Nations' request and provided a revised copy on May 22, 2024.
May 22, 2024	Stoney Nakoda Nations Participation Support	Teck provided the Stoney Nakoda Nations with a participation support agreement for their review and approval.	Teck will await a response from the Stoney Nakoda Nations regarding the support.
July 11, 2024	Glencore Acquisition	Teck announced to the Stoney Nakoda Nations that the acquisition of EVR by Glencore had been approved by the federal government.	EVR will continue to engage with the Stoney Nakoda Nations on the Project and will work to advance identified action items.
September 20, 2024	Pipe Ceremony	EVR attended a pipe ceremony hosted by the Stoney Nakoda Nations on September 20, 2024.	EVR will continue to work collaboratively with the Stoney Nakoda Nations and will work to advance identified action items.
October 9, 2024	Stoney Nakoda Nations Site Visit	The Stoney Nakoda Nations visited the FRX site.	EVR is committed to working with the Stoney Nakoda Nations to support various engagement activities including site visits.
November 20, 2024	Invitation on Water Quality Open House	EVR emailed the Stoney Nakoda Nations an update on the annual Water Quality Open House scheduled for November 26, 2024, and extended an invitation to the event.	EVR is committed to sharing timely and accurate information with the Stoney Nakoda Nations.
January 8, 2025	Stoney Nakoda Nations/EVR Meeting	EVR met with the Stoney Nakoda Nations to discuss the 2025 project schedule and upcoming work.	EVR remains committed to working collaboratively with the Stoney Nakoda Nations throughout the development of the Project.
February 5, 2025	Stoney Nakoda Nations/EVR Meeting	EVR met with the Stoney Nakoda Nations to discuss the FRX Project schedule and upcoming work for 2025.	EVR remains committed to working collaboratively with the Stoney Nakoda Nations throughout the development of the Project and will work to advance identified action items.
March 6, 2025	Follow up from February 5 Meeting	EVR provided a follow up email to the Stoney Nakoda Nations on a number of action items including fieldwork schedules, existing conditions reports, and information sources.	EVR remains committed to working collaboratively with the Stoney Nakoda Nations throughout the development of the Project.
March 25, 2025	Email to Stoney Nakoda Nations	EVR contacted the Stoney Nakoda Nations to schedule summer fieldwork and an FRX Detailed Project Description Update meeting.	EVR and the Stoney Nakoda Nations plan to meet on May 12, 2025.
May 12, 2025	EVR/Stoney Nakoda Nations Meeting	EVR met with the Stoney Nakoda Nations to discuss updates to the FRX Project.	EVR is committed to working with the Stoney Nakoda Nations throughout the development of the Project.
May 23, 2025	Field Visit and Pipe Ceremony Details	EVR shared the June 2025 field visit logistics with the Stoney Nakoda Nations, with Pipe Ceremony logistics information to follow.	EVR is committed to working with the Stoney Nakoda Nations on the Project and will work to advance identified action items.
June 3 - 5, 2025	EVR/Stoney Nakoda Nations Site Visit	The Stoney Nakoda Nations met with EVR for a site visit at the FRX Project.	EVR remains committed to working collaboratively with the Stoney Nakoda Nations throughout the development of the Project.

Note: In July 2024, Teck Coal Limited (Teck) changed its name to EVR Operations Limited (EVR); refer to Section 1.2.1 for details.

BC EAO= British Columbia Environmental Assessment Office; IPD = Initial Project Description; DPD = Detailed Project Description; Q&A = question and answer; EVWQP = Elk Valley Water Quality Plan; TLU = Traditional Land Use; BC EAA = British Columbia *Environmental Assessment Act* ; IAAC = Impact Assessment Agency of Canada; FRX = Fording River Extension; FRO = Fording River Operations; EVR = EVR Operations Limited.

Based on engagement to date, the Stoney Nakoda Nations identified interests and concerns related to:

- land disturbance through existing operations at Fording River and exploratory activities within the Project area
- access to sacred sites and locations for hunting, fishing, harvesting, and ceremonial and cultural practices
- environmental stewardship and natural resource management and monitoring of traditional lands, including:
  - air pollution and air quality
  - water quantity and quality, including selenium and other substances that result from mining and blasting
  - wildlife, including species at risk, animal and plant habitat, trails and corridors
- consideration of traditional knowledge and cultural perspectives and experiential components of the land and resources in the assessment to be conducted for the Project, including:
  - cumulative loss of access to the land and resources
  - culturally important foods and food sovereignty
  - culturally significant trees and plants
  - impacts and damage to unmarked grave sites
  - documentation and preservation of traditional place names and oral narrative within southeastern BC
  - data collection and study participation (e.g., participating in the EMC[23])
  - social and economic impacts and benefits

For more detail on the interests identified by the Stoney Nakoda Nations and EVR's responses, refer to Appendices A and B.

Table 7.4-2 provides a list of engagement activities EVR plans to undertake with the Stoney Nakoda Nations to support the assessment process. EVR did not enter into any agreements with the Stoney Nakoda Nations during early engagement on the Project.

Table 7.4-2: Planned Engagement with the Stoney Nakoda Nations

Item #	Activity
1	Meet with the Stoney Nakoda Nations to discuss in more detail the interests in the Project and a path forward for continued engagement and mitigating potential effects of the Project.

23 Refer to Section 7.1.2 for information on EMC mandate and membership.

7.5 Piikani Nation

Piikani Nation is a member of the *Siksikaistitapi* (Confederacy of the Blackfeet First Nations) (Piikani Nation 2022b) and a signatory to the Blackfoot Treaty of 1877 (No. 7), which covers an area from the BC border to the west, the US border to the south, the Cypress Hills to the east and the Red Deer River to the north. The Project is located within Piikani Ancestral Territory, which is identified by significant Blackfoot landmarks: the *Ponokasisahta* (Elk River, referred to currently as the North Saskatchewan River) in the north; the *Otahkoitahtayi* (the Yellowstone River) in the south; beyond *Omahskispatsikoyii* (the Great Sand Hills, in the area referred to currently as Saskatchewan) to the east; and the Continental Divide (the Rocky Mountains) to the west (Piikani Nation 2022b). Piikani Nation has two reserves: Peigan Timber Limit "B" and Piikani. The proximity of the reserves to the Project is presented in Figure 5.1-3.

Piikani Nation traditionally used travel routes throughout the Elk Valley and harvested plants, wildlife and ceremonial paints throughout the area. Features of cultural and ecological significance to Piikani Nation identified at the Project site include animal sightings (elk, bear and bighorn sheep); plant sightings (sweet pine, lodge pole pine, kinnikinic, sage, huckleberry, raspberry, yarrow, licorice root, juniper and lay down root); and cultural sights (ceremonial materials and vision quest sites) (Piikani Nation 2022a).

Piikani Nation is governed by a Chief and eight Councillors who are elected under a custom electoral system every four years (Piikani Nation 2022b). The Piikani Nation Chief and Council serve as representatives of all Piikani Nation members. The Piikani Nation Council acts in governmental affairs on behalf of Piikani Nation members, provides programs and services, advocates for Indigenous rights and supports stewardship (Piikani Nation 2017).

Teck (now EVR) began engaging with Piikani Nation about the Project and hosted a Project introduction meeting in summer 2020 after Piikani Nation identified their interest in participating in the Project. Piikani Nation and EVR have developed a collaborative approach for the assessment of potential effects of the Project on Piikani Nation’s rights and interests, including a plan for a cyclical process of engagement, writing and reviews to support a collaborative approach to the development of an IS/A that is informed by both Piikani knowledge and western science. EVR acknowledges that Piikani Nation has existing Piikani knowledge and traditional land use information that may be relevant for the Project. EVR is committed to engaging on the applicability of any existing studies or information to the Project and requesting permissions from Piikani Nation for the application of their Indigenous knowledge sources. Table 7.5-1 presents the engagement activities with Piikani Nation to date.

Table 7.5-1: Engagement with Piikani Nation about the Project

Date	Activity	Comments	Approach to Addressing
April 24, 2020	Letter from Piikani Nation to the BC EAO	Piikani Nation identified their interest in participating in the Project assessment process under the BC EAA.	Teck will work with Piikani Nation and the BC EAO (and now the IAAC) to identify and evaluate impacts of the Project on Piikani Nation's interests.
June 23, 2020	Letter from Piikani Nation to the BC EAO	Piikani Nation affirmed their intent to participate in the assessment process under the BC EAA to the BC EAO. The letter included feedback on the Nation's interests on the Project.	
July 29, 2020	Teck Provided Project Update Presentation to Piikani Nation	Teck completed a presentation with Piikani Nation on the Project and discussed further steps for engagement.	Piikani Nation will prepare a work plan for engagement on the Project. Teck plans on incorporating the feedback regarding further steps for engagement into the Engagement Plan for the Project.
September 24, 2020	Piikani Engagement Workplan	Piikani Nation provided a work plan and budget for engagement on the Project for Teck's consideration.	Teck acknowledges receipt of the work plan.
November 3, 2020	Teck Provided Written Approval of Workplan	Teck provided an email to Piikani Nation indicating the proposed work plan is acceptable and work can advance on an engagement agreement.	Teck advanced drafting of an engagement agreement.
November 10, 2020	Email from Shared Value Solutions to Teck	Expression of interest to arrange meeting on Project and encouragement for Teck to draft an engagement agreement.	Follow-up meeting scheduled.
November 17, 2020	Teck Provided Response to Piikani Nation	Teck proposed meeting dates and offered to provide an advance on some of the work plan items.	Follow-up meeting scheduled.
November 24, 2020	Teck Provided Response to Piikani Nation	Vendor form to receive payment.	Teck will continue to work with Piikani Nation on appropriate methods of engagement.
December 2, 2020	Teck Notification on Meeting Schedule Delay	Teck notified Piikani Nation that the scheduled meeting would be delayed until January 2021.	Meeting rescheduled.
December 18, 2020	Piikani Nation Draft DPD Comments	Teck received the comments provided by the Piikani Nation to the IAAC and BC EAO on the draft DPD.	Teck has worked to address the comments in the final version of the DPD and/or identify where comments may be addressed later in the regulatory process, as documented in the comment tracking database.
February 25, 2021	Teck Provided Project update presentation to Piikani Nation.	Teck completed a presentation with Piikani Nation on the FRX Project and discussed the scope of work and budget to support Piikani Nation participation in the interests assessment.	Teck will continue to work with Piikani Nation on appropriate methods of engagement.
March 15, 2021	Piikani Nation Revised Budget	Piikani Nation provided Teck with a revised budget on March 15, 2021, via email.	Teck set up a follow-up meeting to discuss work plan and budget.
June 16, 2021	Piikani Nation/Teck Kick-Off Meeting for Traditional Ecological Knowledge and Land Use Study work	Piikani Nation and Teck met to discuss next steps for the Traditional Ecological Knowledge and Land Use Study for the Project.	Teck will work with Piikani Nation to coordinate a site tour as well as next steps for the Traditional Ecological Knowledge and Land Use Study work.
July 13, 2021	Piikani Nation Teck Site Tour	Teck met with Piikani Nation in person for a site tour of FRO and the Project location.	Teck will support further fieldwork by Piikani Nation to help meet data collection needs for the Traditional Ecological Knowledge and Land Use Study.
July 27, 2021	Piikani Nation/Teck Meeting	Teck met with Piikani Nation to discuss the BC EAO DPD review and GBA+ work.	Teck will continue to engage with Piikani Nation on the FRX assessment.
July 29, 2021	DPD Submission	Teck informed Piikani Nation that the DPD had been submitted and outlined the following steps of the assessment process for the Project.	Teck expressed its commitment to continued engagement with Piikani Nation throughout the development of the Project.
July 30, 2021	DPD Update and Environmental Assessment Process Email	Piikani Nation thanked Teck for the DPD update and next steps in the assessment process.	Teck will work with Piikani Nation if more information is requested.
August 3, 2021	GBA+ Memo	Teck provided Shared Value Solutions with the GBA+ memo that outlined GBA+ requirements and approach for the FRX regulatory process. Teck shared the memo again with Shared Value Solutions and Piikani Nation on September 9, 2021.	Teck will work with Piikani Nation to advance this scope of work per Piikani Nation's preference.
August 10, 2021	Project footprint shapefiles	Teck provided Piikani Nation with the Project footprint shapefiles.	Teck will work with Piikani Nation if more information is requested.
August 10, 2021	Piikani Nation Response Email	Piikani Nation thanked Teck for providing footprint shapefiles and requested shapefiles for VCs.	Teck responded to this information request via email.
August 10, 2021	Shapefiles and VC Response Email	Teck responded to Piikani Nation's request regarding shapefiles for VCs.	Teck will work with Piikani Nation if more information is requested.
August 11, 2021	Technical Advisors Meeting for the Readiness Decision Phase	IAAC and BC EAO technical advisors met to discuss the Readiness Decision Phase. The agenda included FRX Project overview, Project Q&A, coordinated assessment process, assessment process Q&A, closing and next steps.	Teck expressed its commitment to continued engagement with communities and potentially affected Indigenous Peoples as the assessment moves forward in accordance with the requirements for engagement set by the IAAC and BC EAO.
August 30–31, 2021	Piikani Nation Site Visit	Piikani Nation came to site to conduct fieldwork.	Teck will support future site visits as requested.
September 21, 2021	Piikani Nation/Teck Meeting	Teck met with Piikani Nation to discuss COVID-19, Project updates, work plan progress and the regulatory timeline and process.	Teck will continue to engage with Piikani Nation on the Project and will work to advance identified action items.
October 6, 2021	Piikani Nation/Teck Meeting	Teck met with Piikani Nation to discuss COVID-19, Project updates and work plan progress.	Teck will continue to engage with Piikani Nation on the Project and will work to advance identified action items.
October 19, 2021	Piikani Nation/Teck Meeting	Teck met with Piikani Nation to discuss COVID-19, GBA+ scope, Project updates and work plan progress.	Teck will continue to engage with Piikani Nation on the Project and will work to advance identified action items.
October 25, 2021	Piikani Nation Interim Report	Piikani Nation provided Teck with an Interim Report for Piikani Nation's engagement with Teck on the Project.	Teck thanks the efforts Piikani Nation made to develop this report. Teck will review and follow up with Piikani Nation if there are questions.

Table 7.5-1: Engagement with Piikani Nation about the Project

Date	Activity	Comments	Approach to Addressing
November 16, 2021	Piikani Nation/Teck Meeting	Teck met with Piikani Nation to discuss Project updates, introduce new team members from Piikani Nation and discuss work plan progress.	Teck will continue to engage with Piikani Nation on the Project and will work to advance identified action items.
November 17, 2021	Information Requirements for Effects Assessment Letter	Teck provided Piikani Nation with a letter seeking review and input into several aspects of Teck's assessment of potential effects on Indigenous interests. Teck requested a response by December 8, 2021.	Teck will await feedback from Piikani Nation on the Information Requirements for Effects Assessment letter.
November 30, 2021	Piikani Nation/Teck Meeting	Teck met with Piikani Nation to discuss COVID-19, work plan progress, and an update from Piikani Nation on the timing of a response to Teck's Information Requirements for Effects Assessment letter sent November 17, 2021.	Teck will continue to engage Piikani Nation on the Project and will work to advance identified action items.
December 16, 2021	Piikani Nation response to Information Requirements for Effects Assessment letter	Piikani Nation responded to Teck's Information Requirements for Effects Assessment letter, sent on November 17, 2021.	Teck thanks Piikani Nation for their contribution and will review the package and put together a response.
January 11, 2022	Piikani Nation/Teck Meeting	Teck met with Piikani Nation to discuss COVID-19, introduce new team members from Teck, work plan progress and GBA+ scope.	Teck will continue to engage with Piikani Nation on the Project and will work to advance identified action items.
February 4, 2022	Teck Response to Piikani Nation Information Requirements for Effects Assessment Letter Response	Teck provided Piikani Nation with a letter response to questions raised in their Information Requirements for Effects Assessment letter response to Teck, sent on December 16, 2021.	Teck will continue to work with Piikani Nation to share information to support Piikani Nation's interests' assessment for the Project.
February 8, 2022	Piikani Nation/Teck Meeting	Teck met with Piikani Nation to discuss COVID-19, Project update, work plan progress and GBA+ scope.	Teck will continue to engage with Piikani Nation on the Project and will work to advance identified action items.
March 8, 2022	GBA+ Progress Update	Piikani Nation provided Teck with an email update regarding the GBA+ work plan.	Teck appreciated receiving an update on Piikani Nation's work and will discuss this topic at the next meeting with Piikani Nation.
March 8, 2022	Piikani Nation/Teck Meeting	Teck met with Piikani Nation to discuss community updates, in-person engagement opportunities, GBA+ scope and work plan progress.	Teck will continue to engage with Piikani Nation on the Project and will work to advance identified action items.
March 15, 2022	GBA+ Scope update	Piikani Nation provided Teck with an update via email on the GBA+ scope.	Teck appreciates receiving an update on Piikani Nation's work.
March 16, 2022	GBA+ Scope update response	Teck responded to Piikani Nation via email thanking them for the update on the GBA+ scope.	No further engagement required on this item.
May 4, 2022	Draft Plan for Approach to Indigenous Interests section	Teck provided Piikani Nation with the information outlining the approach to the Indigenous Interests assessment for Piikani Nation review.	Teck will continue to work with Piikani Nation on the approach to the Indigenous Interests section of the IS/A.
May 17, 2022	Piikani Nation/Teck Meeting	Teck met with Piikani Nation to discuss Readiness Decision timeline, work plan progress, use of Indigenous knowledge and the letter submission from Piikani Nation to the BC EAO regarding the Project moving into the assessment phase.	Teck will continue to engage with Piikani Nation on the Project and will work to advance identified action items.
May 30, 2022	Human Health Receptor Locations for the Human Health Risk Assessment of the Project	Teck provided Piikani Nation with the human health receptor locations for the Human Health Risk Assessment of the Project and requested Piikani Nation to review the information and provide feedback to Teck by June 30, 2022.	Teck will continue to work with Piikani Nation to share information to support the Piikani Nation interests in the assessment for the Project.
June 6, 2022	Use of Indigenous Knowledge Draft Approach	Teck provided Piikani Nation for review a draft plan for the use of Indigenous knowledge in the coordinated assessment of the FRX Project.	Teck will continue to work with Piikani Nation on the use of Indigenous knowledge.
June 7, 2022	Workshop	Teck held first workshop with Piikani Nation to discuss a collaborative approach to the Indigenous Interests section of the IS/A.	Teck will continue to work with Piikani Nation on the approach to the Indigenous Interests section of the IS/A and the use of Indigenous knowledge.
June 9, 2022	Workshop Action Items	Teck provided Piikani Nation with an update following the June 7, 2022, workshop with a list of actions items.	Teck will work with Piikani Nation to advance action items as identified.
June 10, 2022	Piikani Indigenous Knowledge Report Table of Contents	Piikani Nation provided Teck a table of contents for Piikani Nation's Indigenous Knowledge Report.	Teck appreciates receiving an update on Piikani Nation's work.
June 28, 2022	Workshop	Teck held second workshop with Piikani Nation to further discuss the approach to the Indigenous Interests section of the IS/A and the use of Indigenous knowledge.	Teck will continue to work with Piikani Nation on the approach to the Indigenous Interests section of the IS/A and the use of Indigenous knowledge.
July 26, 2022	Piikani Nation/Teck Meeting	Teck met with Piikani Nation to discuss work plan progress, timing for a future meeting on the use of Indigenous knowledge and future discussions around closure.	Teck will continue to engage with Piikani Nation on the Project and will work to advance identified action items.
August 3, 2022	EVWQP Update	Teck provided Piikani Nation with an update on the EVWQP.	Teck will continue to engage with Piikani Nation throughout the development of the Project.
August 19, 2022	Indigenous Knowledge Workshop Logistics	Teck postponed the June 28, 2022, Indigenous knowledge workshop to September 6, 2022, with Piikani Nation to accommodate schedules.	Teck will continue to engage with Piikani Nation throughout the development of the Project.
August 29, 2022	Final TLU Study	Teck received the final TLU Study from Piikani Nation.	Teck will continue to engage with Piikani Nation on the TLU Study report.
September 6, 2022	Workshop	Teck and Piikani Nation held a workshop that included discussion of Piikani Nation knowledge and an introduction to assessment methods.	Teck will continue to engage with Piikani Nation on the Indigenous Interests Assessment.
September 6, 2022	Workshop Materials	Teck provided Piikani Nation with materials related to the Indigenous knowledge workshops.	Teck will continue to engage with Piikani Nation on the Indigenous Interests Assessment.

Table 7.5-1: Engagement with Piikani Nation about the Project

Date	Activity	Comments	Approach to Addressing
September 21, 2022	Piikani Nation/Teck Meeting	Teck met with Piikani Nation to discuss the Indigenous Interests section of the IS/A, GBA+, Piikani Nation's TLU Study and upcoming work.	Teck will continue to engage with Piikani Nation on the Project and will work to advance identified action items.
October 11, 2022	Piikani Nation/Teck Meeting	Teck met with Piikani Nation to discuss Project updates and Piikani Nation's work plan.	Teck will continue to engage with Piikani Nation throughout the development of the Project.
October 11, 2022	Email and Letter	Teck provided Piikani Nation with a response and recommendations for Piikani Nation's Indigenous knowledge and land use impact study received on August 29, 2022.	Teck will work with Piikani Nation on the Indigenous knowledge and land use impact study.
November 1, 2022	Piikani Nation/Teck Meeting	Teck met with Piikani Nation to discuss changes to consultant support and the Indigenous Interests section of the IS/A.	Teck will continue to engage with Piikani Nation throughout the development of the Project.
November 7, 2022	Email – Next Steps for Piikani Nation/Teck Work	Piikani Nation indicated it would be helpful to have a list of priority work items to advance work between Teck and Piikani Nation. Teck responded via email and provided Piikani Nation with a list of work priorities. Piikani Nation confirmed receipt.	Teck will continue to engage with Piikani Nation throughout the development of the Project.
December 1, 2022	Piikani Nation/Teck Meeting	Teck met with Piikani Nation to discuss updates to the Readiness Decision timeline, community updates, GBA+ updates and Indigenous Interests Section Workshops.	Teck will continue to engage with Piikani Nation throughout the development of the Project.
January 25, 2023	Workshop	Teck and Piikani Nation held a workshop to discuss assessment boundaries and existing conditions.	Teck will continue to engage with Piikani Nation on the Indigenous Interests Assessment.
January 31, 2023	Leadership Information	Teck provided Piikani Nation with information to support discussions with leadership.	Teck will continue to engage with Piikani Nation throughout the development of the Project.
February 21, 2023	Piikani Nation/Teck Meeting	Teck met with Piikani Nation to discuss the company separation news and next engagement steps.	Teck will continue to engage with Piikani Nation throughout the development of the Project.
February 22, 2023	Workshop Information	Teck provided Piikani Nation with the existing conditions workshop information for Piikani Nation's review and feedback.	Teck will continue to engage with Piikani Nation throughout the development of the Project.
March 9, 2023	Piikani Nation/Teck Meeting	Teck and Piikani Nation met to discuss the budget and work plan for 2023.	Teck will continue to engage with Piikani Nation throughout the development of the Project.
March 21, 2023	Piikani Nation/Teck Meeting	Teck and Piikani Nation met to discuss Piikani Nation's review of previous workshop materials, the 2023 work scope and budget.	Teck will continue to engage with Piikani Nation throughout the development of the Project.
April 5, 2023	Piikani Nation/Teck Meeting	Teck and Piikani Nation met to discuss the development of a work plan and budget.	Teck will review work plan and budget and provide feedback to Piikani Nation once received.
May 23, 2023	Piikani Nation/Teck Meeting	Teck met with Piikani Nation to discus their work plan.	Teck will continue to engage with Piikani Nation throughout the development of the Project.
June 13, 2023	Piikani Nation/Teck Meeting	Teck met with Piikani Nation and discussed the Indigenous Interests section of the IS/A.	Teck will continue to engage with Piikani Nation on the Indigenous Interests Assessment.
July 4, 2023	Piikani Nation/Teck Meeting	Teck met with Piikani Nation to discus their work plan.	Teck will continue to engage with Piikani Nation throughout the development of the Project.
July 11, 2023	Participation Support	Piikani Nation requested an update on the status of participation support.	Teck will continue to work with Piikani Nation to support their participation in the Project.
July 11, 2023	Participation Support	Teck responded to Piikani Nation with an update on participation support.	
July 11, 2023	Meeting Agenda Topics	Teck emailed Piikani Nation about agenda topics for the following meeting.	Teck will continue to engage with Piikani Nation throughout the development of the Project.
July 28, 2023	Participation Support	Piikani Nation indicated a change to the participation support provided by Teck.	Teck will work with Piikani Nation to advance this action item.
July 31, 2023	Participation Support	Teck agreed to Piikani Nation's indicated changes to participation support.	Teck will continue to work with Piikani Nation to support their participation in the Project.
July 31, 2023	Piikani Nation SharePoint link	Teck provided Piikani Nation with a link to a shared SharePoint site.	Teck is committed to sharing timely and accurate information with communities and local Indigenous groups.
August 15, 2023	Piikani Nation/Teck Meeting	Teck met with Piikani Nation to discuss progress on their work plan.	Teck will continue to engage with Piikani Nation throughout the development of the Project.
August 22, 2023	Piikani Nation/Teck Meeting	Teck met with Piikani Nation to discuss work planned for 2023, including upcoming fieldwork.	Teck will support Piikani Nation with planning their fieldwork.
August 23, 2023	Fieldwork Logistics	Teck provided Piikani Nation with wildfire resources and updates ahead of their fieldwork in the Elk Valley.	
September 12, 2023	Fieldwork Logistics	Piikani Nation and Teck coordinated on fieldwork logistics via email.	
September 12, 2023	Piikani Nation/Teck Meeting	Teck met with Piikani Nation to discuss upcoming fieldwork Project updates.	Teck will continue to engage with communities and local Indigenous groups throughout the development of the Project.
September 20, 2023	Piikani Nation/Teck Fieldwork Visit	Teck met with Piikani Nation elders, staff and consultants at a fieldwork location in the Elk Valley.	Teck will continue to engage with Piikani Nation throughout the development of the Project.
September 27, 2023	Fieldwork Follow-up	Teck followed up with Piikani Nation on the potential for a site visit in early October 2023.	Teck will continue to support Piikani Nation with planning their fieldwork.
October 3, 2023	Piikani Nation/Teck Meeting	Teck met with Piikani Nation to discuss Project updates and recent fieldwork that was conducted in September 2023.	Teck will continue to engage with Piikani Nation throughout the development of the Project.
October 23, 2023	Existing Conditions Reports	Teck provided information about existing conditions reports.	Teck will share existing conditions reports with Piikani Nation as they are available.
October 17, 2023	Piikani Nation/Teck Meeting	Teck met with Piikani Nation to discuss Project updates and progress on their work plan.	Teck will continue to engage with Piikani Nation throughout the development of the Project.
October 24, 2023	EMC Open House	Teck invited Piikani Nation to attend the November 7 EMC Open House.	Teck will continue to engage with Piikani Nation throughout the development of the Project.

Table 7.5-1: Engagement with Piikani Nation about the Project

Date	Activity	Comments	Approach to Addressing
November 7, 2023	Existing Conditions Report	Teck shared the draft Wildlife, Noise, Light, and Visual Aesthetics existing conditions reports with Piikani Nation.	Teck will continue to share existing conditions reports with Piikani Nation.
November 14, 2023	Piikani Nation/Teck Meeting	Teck met with Piikani Nation to discuss a future workshop and the sale of the steelmaking coal business.	Teck will continue to engage with communities and local Indigenous groups throughout the development of the Project.
November 16, 2023	FRX Study Area Map Files	Piikani Nation inquired about the map files of the FRX study area.	Teck will provide Piikani Nation with the shapefiles.
November 20, 2023	FRX Study Area Map Files	Teck provided Piikani Nation with a SharePoint link to the FRX-specific shapefiles.	Teck is committed to sharing timely and accurate information with communities and local Indigenous groups.
November 27, 2023	Workshop Materials	Teck provided Piikani Nation with the November 28, 2023, workshop presentation slides and provided an update on the starting time.	Teck will continue to engage with Piikani Nation throughout the development of the Project.
November 28, 2023	Workshop	Teck and Piikani Nation held a workshop in Calgary focused on potential effects.	Teck will continue to engage with Piikani Nation on potential effects and mitigations.
November 29, 2023	Workshop Follow-up	Teck thanked Piikani Nation for attending the November 28, 2023, co-authorship workshop.	Teck will continue to engage with Piikani Nation throughout the development of the Project.
December 12, 2023	Piikani Nation/Teck Meeting	Teck met with Piikani Nation to discuss Project updates including existing conditions reports.	Teck will continue to engage with Piikani Nation throughout the development of the Project.
December 19, 2023	Year End Appreciation	Teck expressed appreciation to Piikani Nation for the engagement completed in 2023.	Teck will continue to engage with Piikani Nation throughout the development of the Project.
January 2, 2024	Existing Conditions Reports	Teck informed Piikani Nation that existing conditions reports were added to the shared SharePoint site.	Teck is committed to sharing timely and accurate information with communities and local Indigenous groups.
January 8, 2024	Existing Conditions Reports	Piikani Nation confirmed they had received the conditions reports last week and informed Teck they would be reviewing them in the coming days and indicated scheduling a meeting at the end of January 2024.	Teck provided Piikani Nation with options for scheduling the next meeting.
January 15, 2024	November 2023 Workshop	Teck provided Piikani Nation with the summary for the November 2023 workshop and requested revisions.	Teck will continue to engage with Piikani Nation on the FRX assessment.
January 30, 2024	Piikani Nation/Teck Meeting	Teck met with Piikani Nation to discuss Project updates and the upcoming workshop.	Teck will continue to engage with Piikani Nation on the FRX assessment.
February 13, 2024	Piikani Nation/Teck Meeting	Teck met with Piikani Nation to discuss Project updates and the upcoming workshop.	Teck will continue to engage with Piikani Nation throughout the development of the Project.
February 27, 2024	Piikani Nation/Teck Meeting	Teck met with Piikani Nation in person for a full day workshop focused on their Rights Impact Assessment Report and potential effects and mitigations.	Teck will continue to engage with Piikani Nation on the Rights Impact Assessment Report and potential effects and mitigations.
March 4, 2024	New Existing Conditions Reports	Teck provided new existing conditions reports to Piikani Nation.	Teck is committed to sharing timely and accurate information with communities and local Indigenous groups.
March 12, 2024	Piikani Nation/Teck Meeting	Piikani Nation and Teck met to discuss ongoing reports and co-authorship next steps.	Teck will continue to engage with Piikani Nation on the FRX assessment.
March 20, 2024	Workshop Summary and Plans List	Teck provided Piikani Nation with the summary from the February 27 workshop and the FRX existing conditions plant list.	Teck is committed to sharing timely and accurate information with Piikani Nation.
April 22, 2024	Plan on a Page	Teck provided Piikani Nation with the plan on a page for the May 7 co-authorship workshop.	Teck will continue to engage with Piikani Nation on the FRX assessment.
April 23, 2024	Piikani Nation/Teck Meeting	Teck met with Piikani Nation to discuss Project updates and harvesting.	Teck will continue to engage with Piikani Nation throughout the development of the Project.
May 7, 2024	Harvesting follow-up	Teck provided additional information to Piikani Nation regarding harvesting.	Teck will continue to engage with Piikani Nation on themes of interest to them.
May 21, 2024	Piikani Nation/Teck Meeting	Teck met with Piikani Nation to discuss Project updates and Piikani Nation's work plan including their Rights Impact Assessment Report.	Teck will continue to engage with Piikani Nation throughout the development of the Project and discussed a potential site visit for Piikani Nation (see June 11, 2024).
May 30, 2024	Piikani Nation Rights Impact Assessment Report	Piikani Nation provided Teck with a Rights Impact Assessment Report. The package of information included: 1. Rights Impact Assessment 2. Archaeology Literature Review 3. Archival Literature Review 4. Traditional Knowledge, Land Use and Occupancy Study 5. Cumulative Effects Assessment	Teck thanked Piikani Nation for sending the documents for the Elk Valley Rights Impact Assessment on May 30, 2024. Teck is currently reviewing the reports.
June 11, 2024	Site Visit	Piikani Nation participated in a site visit at the FRX Project site.	Teck will continue to support site visits with Piikani Nation.
June 18, 2024	Piikani Nation/Teck Meeting	Teck met with Piikani Nation and discussed the recent site visit, upcoming community events and Piikani Nation's Rights Impact Assessment Report.	Teck will continue to work collaboratively with Piikani Nation on development of the Rights Impact Assessment Report.
July 8, 2024	Glencore Acquisition	Teck announced to Piikani Nation that the acquisition of EVR by Glencore was approved by the federal government.	EVR will continue to engage with Piikani Nation on the Project and will work to advance identified action items.
July 16, 2024	Piikani Nation/EVR Meeting	EVR met with Piikani Nation and discussed the transition to EVR and other Project updates.	EVR will continue to engage with Piikani Nation on the Project and will work to advance identified action items.
July 18, 2024	Rights and Impact Assessment Report Indigenous Interest Section Workshop	EVR shared with Piikani Nation a summary and slide deck presentation from a June 4, 2024, workshop on the Indigenous Interest Section and Piikani Nation's Rights Impact Assessment Report for feedback.	EVR will continue to work collaboratively with Piikani Nation with these deliverables.
July 19, 2024	Community Pancake Breakfast	EVR attended a community pancake breakfast hosted by Piikani Nation on July 30, 2024.	EVR will continue to work collaboratively with Piikani Nation through community event participation.
August 6, 2024	Piikani Nation/EVR Meeting	EVR met with Piikani Nation to discuss a potential site visit, workplan, and community events	EVR will continue to engage Piikani Nation on the Project and on the development of the workplan and budget.

Table 7.5-1: Engagement with Piikani Nation about the Project

Date	Activity	Comments	Approach to Addressing
August 14, 2024	Agreement Discussions	EVR shared information on Piikani Nation's proposed 2024–2025 workplan and budget.	EVR will continue to engage with Piikani Nation on the development of the workplan and budget throughout the development of the Project.
August 19, 2024	Agreement Discussions	Piikani Nation submitted a budget and work plan proposal to EVR for their participation in the Project environmental assessment process for 2024–2025.	
September 3, 2024	Letter for Workshop and Draft Plan on a Page	EVR emailed Piikani Nation a draft plan on a page for the October 2, 2024, workshop.	EVR will continue to work collaboratively with Piikani Nation on the development of the workshop.
September 9, 2024	Request for Information	Piikani Nation requested a detailed road access map, the FRX Archaeological Overview Assessment report and vehicle transportation for Piikani Nation members.	EVR remains committed to providing relevant documents and supporting logistics for engagement with Piikani Nation.
September 12, 2024	Archaeological Overview Assessment and EVR responses to the Piikani Nation Elk Valley Rights Impact Assessment Reports	EVR emailed Piikani Nation the Archaeological Overview Assessment report and EVR responses to the Piikani Nation Elk Valley Rights Impact Assessment reports.	EVR remains committed to providing relevant documents and supporting logistics for engagement with Piikani Nation.
September 16, 2024	Field Visit	Piikani Nation visited the FRX site for a Field Visit from September 16–18, 2024, focused on the Chauncey area, North Castle and South Castle.	EVR will continue to work collaboratively with Piikani Nation on the outcomes of the field visit.
October 2, 2024	Archaeology and Water Quality Reports	EVR shared archaeology and water quality reports with Piikani Nation, offering access to additional reports and an invitation to discuss.	EVR will continue to engage with the Piikani Nation on these reports.
October 22, 2024	Existing Conditions Fish and Fish Habitat Report	EVR shared the Existing Conditions Fish and Fish Habitat report to the Piikani Nation for review.	EVR is committed to sharing timely and accurate information with Piikani Nation.
November 4, 2024	Rights Impact Assessment Report Workshop	EVR held a Rights Impact Assessment Report workshop with Piikani Nation.	EVR will continue to engage with Piikani Nation throughout the development of the Project.
November 19, 2024	Piikani Nation/EVR Meeting	EVR met with Piikani Nation to schedule meetings for 2025.	EVR is committed to working with Piikani Nation to support various engagement activities.
November 20, 2024	Invitation on Water Quality Open House	EVR emailed Piikani Nation an update on the annual Water Quality Open House scheduled for November 26, 2024, and extended an invitation to the event.	EVR is committed to sharing timely and accurate information with Piikani Nation.
December 10, 2024	Workshop Summary	EVR shared a workshop summary and draft chapter from November 4, 2024, co-authorship workshop with Piikani for review.	EVR is committed to sharing timely and accurate information with Piikani Nation.
January 28, 2025	Piikani Nation/EVR Meeting	EVR met with Piikani Nation to discuss FRX Project updates and the 2025 fieldwork and workshop schedules.	EVR remains committed to working collaboratively with Piikani Nation throughout the development of the Project.
February 12, 2025	Piikani Nation/EVR Meeting	EVR met with Piikani Nation to discuss regulatory updates and the FRX Project.	EVR remains committed to working collaboratively with Piikani Nation throughout the development of the Project.
February 25, 2025	Piikani Nation/EVR Meeting	EVR met with Piikani Nation to discuss regulatory updates and the FRX Project.	EVR remains committed to working collaboratively with Piikani Nation throughout the development of the Project.
March 24, 2025	EVR/Piikani Nation Email	EVR emailed Piikani Nation the draft Plan on a Page for the April 2025 Indigenous Interest Section workshop and requested their review.	EVR remains committed to working collaboratively with Piikani Nation throughout the development of the Project and will work to advance identified action items.
March 25, 2025	Piikani Nation/EVR Meeting	EVR met with Piikani Nation to discuss regulatory updates and the FRX Project.	EVR remains committed to working collaboratively with Piikani Nation throughout the development of the Project.
April 3, 2025	Workshop	EVR and Piikani Nation held a workshop in Calgary focused on Indigenous Interest Section.	EVR remains committed to working collaboratively with Piikani Nation on their interests.
April 22, 2025	Piikani Nation/EVR Meeting	EVR met with Piikani Nation to discuss regulatory updates and the FRX Project.	EVR remains committed to working collaboratively with Piikani Nation throughout the development of the Project.
May 6, 2025	Piikani Nation/EVR Revised DPD Update Meeting	EVR met with Piikani Nation to provide an update on the changes in the Revised DPD.	EVR remains committed to providing timely information to Piikani Nation throughout the development of the Project.
May 26, 2025	EVR visit to Head-Smashed-in-Buffalo Jump	EVR visited Head-Smashed-in-Buffalo Jump in person to learn more about Piikani history and culture.	EVR is committed to learning and understanding more about Piikani perspectives, history and culture.
June 3, 2025	EVR/Piikani Nation Meeting	EVR met with Piikani Nation to discuss regulatory updates, and the upcoming site visit.	EVR is committed to working with Piikani Nation on the Project and will work to advance identified action items.
June 10, 2025	EVR/Piikani Nation Site Visit	Piikani Nation met with EVR for a site visit at the FRX Project.	EVR remains committed to working collaboratively with Piikani Nation throughout the development of the Project.
June 11, 2025	EVR/Piikani Nation Site Visit	Piikani Nation met with EVR for a site visit at the FRX Project.	EVR remains committed to working collaboratively with Piikani Nation throughout the development of the Project.

Note: In July 2024, Teck Coal Limited (Teck) changed its name to EVR Operations Limited (EVR); refer to Section 1.2.1 for details.

BC EAO= British Columbia Environmental Assessment Office; DPD = Detailed Project Description; EMC = Environmental Monitoring Committee; GBA+ = Gender-Based Analysis Plus; VC = valued component; Q&A = question and answer; IS/A = Impact Statement/Application; EVWQP = Elk Valley Water Quality Plan; TLU =Traditional Land Use; BC EAA = British Columbia *Environmental Assessment Act* ; IAAC = Impact Assessment Agency of Canada; FRX = Fording River Extension; FRO = Fording River Operations; EVR = EVR Operations Limited; COVID-19 = Coronavirus Disease 2019.

Based on engagement to date, Piikani Nation identified 13 preliminary themes that captured their concerns and interests: access, air, cultural Heritage and archaeology, cumulative effects, community health, economic partnerships and communication, education and employment, harvesting, monitoring, Rights and Title, and water. Key interests and concerns related to these themes include:

- Piikani Nation's asserted Treaty Rights, including the right to hunt, trap and harvest natural resources within their Ancestral Territory; the right to their way of life; to the use, enjoyment and control of lands reserved for them; and the right to a livelihood and cultural and spiritual practices from their traditional lands
- cumulative effects on Piikani Nation's ability to exercise their constitutionally protected rights from reduced access to their Ancestral Territory on either side of the BC–Alberta border
- Piikani Nation's sacred duty as stewards to their Ancestral Territory to protect the ecological integrity, human health, traditional land use activities and cultural values it supports
- decreased access to Ancestral Territory for cultural and spiritual use
- important cultural areas and sacred sites where Piikani Nation citizens practise cultural and spiritual activities
- archaeological sites within the Project area
- changes to current use of culturally significant areas due to disturbance and increased access by mine employees, contractors and/or the general public
- traditional land and resource use, including effects and risks to current and future generations of harvesters and land users and the harvesting and use of plants and vegetation for medicinal, ceremonial and other cultural purposes, including saskatoon, soopolallie (buffaloberry), ochre, whitebark pine, common juniper, birch, yarrow, lodgepole pine, willows, mint, sweet pine, bear root, goat sage, licorice plant and cedar
- potential effects on Piikani Nation cultural practices due to climate change, including changes to ecosystems, vegetation, wildlife, snowpack and water quantity
- ecosystems that support biodiversity and ecosystem function including high elevation grasslands, mature and old growth forests, forests and tributaries as well as the subsistence and culturally important species within these ecosystems
- wildlife, wildlife habitat, wildlife health and alteration of movement patterns due to loss of habitat, connectivity and winter range areas; changes in air, water and soil quality; sensory disturbance; and movement caused by the Project
- traditional foods, including loss of or changes to wildlife, plants and fish as well as wildlife, plant and fish habitat
- grizzly bear, which has important significance within Piikani Nation's spiritual and ceremonial teachings, songs, ceremonies, medicines and stories
- increased access by mine employees, contractors, and/or the general public to the area near the Project creates increased hunting, harvesting, gathering and fishing pressure
- impacts to air quality by coal dust
- changes to water quality and quantity in relation to fish population in the Elk River watershed (including effects of selenium)

For more detail on interests identified by Piikani Nation during early engagement, and Teck's (now EVR's) responses, refer to Appendix A.

Table 7.5-2 provides a list of engagement activities EVR plans to undertake with Piikani Nation to support the assessment process.

Table 7.5-2: Planned Engagement with Piikani Nation

Item #	Activity
1	Meet with Piikani Nation to continue a collaborative approach for the assessment of potential effects of the Project on Piikani Nation's rights and interests and associated mitigation measures, and to support a collaborative approach to the development of an IS/A that is informed by both Piikani knowledge and western science.

IS/A = Impact Statement/Application.

Teck (now EVR) entered into an agreement with Piikani Nation in June 2021 to facilitate engagement and the collection of data to support the identification of Piikani Nation interests related to the Project. The agreement was updated in 2023.

7.6 Siksika Nation

Siksika Nation is the most northern tribe of the Blackfoot Confederacy, known as the *Siksikaitsittapi* in *Siksikai'powahsini* (Blackfoot language), and is a signatory to the Blackfoot Treaty of 1877 (No. 7), which covers an area from BC border to the west, the US border to the south, the Cypress Hills to the east and the Red Deer River to the north. Siksika Nation has one reserve, Siksika 146. The proximity of this reserve in proximity to the Project is presented in Figure 5.1-3.

The Project is located within the Traditional Territory of Siksika Nation, also called the *Kitaowahsinnoon* (Blackfoot Traditional Territory) (Olson, Firelight Research, and Siksika Nation 2022). The Traditional Territory extends from the North Saskatchewan River in the north to the Yellowstone River to the south. The confluence of the North and South Saskatchewan rivers is the easternmost part of the Territory, and the Rocky Mountains are the westernmost part of the Territory (Olson, Firelight Research, and Siksika Nation 2022). Siksika Nation has indicated that the Project area continues to be an area of importance used for travel, trade, harvesting, ceremony and Society Member practices. In present day, Siksika Nation continues to steward lands, waters and resources to maintain Blackfoot culture and language in accordance with the Creator's teachings (Olson, Firelight Research, and Siksika Nation 2022). Siksika Nation uses all resources in their Traditional Territory and has identified the resources as essential to maintaining cultural practices. In present day, traditional activities, such as hunting, fishing, plant gathering and ceremonial activities, continue to be taught and passed down to succeeding generations (Siksika Nation 2021).

Siksika Nation is governed by a Chief and 12 Councillors that are elected by voting members of Siksika Nation every three years under a custom electoral system (Siksika Nation 2022). Siksika Nation is a signatory to the First Nations Management Framework Agreement but has voted to become inactive and has not proceeded to governance and management control over Siksika Nation lands.

Teck (now EVR) began engaging with Siksika Nation about the Project and hosted a Project introduction meeting in spring 2020 after Siksika Nation identified their interest in participating in the Project. Siksika Nation and EVR have developed a collaborative approach for the assessment of potential effects of the Project on Siksika Nation's rights and interests, including a plan for a cyclical process of engagement, writing and reviews to support a collaborative approach to the development of an IS/A that is informed by both Siksika knowledge and western science. EVR acknowledges that Siksika Nation has existing Siksika knowledge and traditional land use information that may be relevant for the Project. EVR is committed to engaging on the applicability of any existing studies or information to the Project and requesting permissions from Siksika Nation for the application of their Indigenous knowledge sources. Table 7.6-1 presents engagement with Siksika Nation to date.

Table 7.6-1: Engagement with Siksika Nation about the Project

Date	Activity	Comments	Approach to Addressing
May 5, 2020	Letter from Siksika Nation to the BC EAO	Siksika Nation identified their interest in participating in the Project assessment process under the BC EAA.	Teck will work with Siksika Nation and the BC EAO (and now the IAAC) to identify and evaluate impacts of the Project on Siksika Nation's interests.
May 8, 2020	Letter from Kainai (Blood Tribe) and Siksika Nation to Teck	Letter with attached reports providing supplementary information on Blackfoot Traditional Use and Occupancy in the East Kootenays.	Teck reviewed documents to advance understanding of Kainai (Blood Tribe) and Siksika Nation interest in the Project and historical use of the region.
May 13, 2020	Call with Siksika Nation	Teck met with Siksika Nation to introduce Teck's operations in the Elk Valley and the Project and invited engagement moving forward.	Teck will work with Siksika Nation to develop an appropriate path forward for engagement on the Project.
June 24, 2020	Letter from Siksika Nation to the BC EAO	Letter affirming Siksika Nation's intent to participate in the Project assessment process under the BC EAA. Letter included feedback on Siksika Nation's interests in the Project.	Teck will work with Siksika Nation and the BC EAO (and now the IAAC) to identify and evaluate impacts of the Project on Siksika Nation's interests.
June 19, 2020	Letter from Kainai (Blood Tribe) and Siksika Nation to the IAAC	Letter requesting the Project be federally designated under the IAAC.	Teck acknowledges the federal designation decision on August 19 and the potentially affected Indigenous Peoples that may have an interest in the Project.
July 31, 2020	Letter from Kainai (Blood Tribe) and Siksika Nation to the IAAC	Letter re-affirming Siksika Nation's request to have the Project federally designated under the IAA.	
September 3, 2020	Proposal on engagement participation provided to Teck by Siksika Nation	Siksika Nation provided Teck with a Scope of Work to support engagement participation in the Project regulatory process.	Teck will work with Siksika Nation to evaluate the potential Project impacts on their interests.
November 3, 2020	Letter from Siksika Nation to IAAC	Letter providing feedback on the federal IPD.	Teck acknowledges feedback provided by Siksika Nation and will continue to work with Siksika Nation to evaluate impacts of the Project on Siksika Nation's interests.
December 18, 2020	Siksika Nation draft DPD Comments	Teck received the comments provided by Siksika Nation to the IAAC and BC EAO on the draft DPD.	Teck has worked to address the comments in the final version of the DPD and/or to identify where comments may be addressed later in the regulatory process, as documented in the comment tracking database.
May 27, 2021	Letter from Siksika Nation to KNC, the IAAC and the BC EAO	Siksika Nation provided a letter outlining their position on Aboriginal rights and traditional use in southeastern BC.	Teck appreciates and acknowledges the information provided in the letter and will continue to work with Siksika Nation to understand their interests in the Project.
July 15, 2021	Siksika Nation/Teck Kick-Off Meeting for Traditional Land Use Study work	Siksika Nation and Teck met to discuss next steps for the Traditional Land Use Study for the Project.	Teck will work with Siksika Nation to coordinate a site tour as well as next steps for the Traditional Land Use Study work.
July 29, 2021	DPD submission	Teck informed Siksika Nation that the DPD had been submitted and outlined the following steps of the assessment process for the Project.	Teck expressed its commitment to continued engagement with communities and potentially affected Indigenous Peoples as the assessment moves forward in accordance with the requirements for engagement set by the IAAC and BC EAO.
August 3, 2021	GBA+ Memo	Teck provided Siksika Nation with the GBA+ memo that outlined the GBA+ requirements and approach for the FRX regulatory process. Teck requested Siksika to review the memo and provide questions and comments.	Teck will work with Siksika Nation to advance this scope of work per Siksika Nation's preference.
August 6, 2021	Siksika Nation Site Visit	Teck provided Siksika Nation with a site tour of the Project area and addressed questions and comments.	Teck will follow up with Siksika Nation to see if they have feedback following the site tour.
August 11, 2021	Technical Advisors Meeting for the Readiness Decision Phase	IAAC and BC EAO technical advisors met to discuss the Readiness Decision Phase. The agenda included the FRX Project overview, Project Q&A, coordinated assessment process, assessment process Q&A, closing and next steps.	Teck expressed its commitment to continued engagement with communities and potentially affected Indigenous Peoples throughout the development of the Project.
August 16, 2021	Siksika Nation/Teck Meeting	Teck met with Siksika Nation to discuss Project updates, a potential site visit and work plan progress.	Teck will continue to engage with Siksika Nation on the Project and will work to advance identified action items.
September 28, 2021	Email summary of phone call	Teck provided Siksika Nation with an email summarizing what was discussed via phone call earlier in the day.	Teck will continue to engage with Siksika Nation on the Project and will work to advance identified action items.
September 29, 2021	Siksika Nation/Teck Meeting	Teck met with Siksika Nation to discuss COVID-19, fieldwork, Readiness Decision timing and work plan progress.	Teck will continue to engage with Siksika Nation on the Project and will work to advance identified action items.
November 8, 2021	Siksika Nation/Teck Meeting	Teck met with Siksika Nation to discuss COVID-19, community updates, Project updates, work plan progress and the incoming Information Requirements for Effects Assessment letter from Teck.	Teck will continue to engage with Siksika Nation on the Project and will work to advance identified action items.
November 17, 2021	Information Requirements for Effects Assessment letter	Teck provided Siksika Nation with a letter seeking review and input into several aspects of Teck's assessment of potential effects on Indigenous interests. Teck requested a response by December 8, 2021.	Teck will await feedback from Siksika Nation on the Information Requirements for Effects Assessment letter.
December 6, 2021	Siksika Nation/Teck Meeting	Teck met with Siksika Nation to discuss work plan progress and Siksika Nation's planned response to Teck's information request.	Teck will continue to engage with Siksika Nation on the Project and will work to advance identified action items.
December 9, 2021	Information Requirements for Effects Assessment letter Siksika Nation response email	Siksika Nation responded to Teck's Information Requirements for Effects Assessment letter, sent on November 17, 2021.	Teck thanks Siksika Nation for their contribution and will review and follow up with Siksika Nation if there are further questions.
January 31, 2022	Siksika Nation/Teck Meeting	Teck met with Siksika Nation to discuss COVID-19, Project updates, work plan progress and report timing.	Teck will continue to engage with Siksika Nation on the Project and will work to advance identified action items.
February 4, 2022	Teck's response on the comments from Siksika Nation on the Information Requirements for Effects Assessment letter	Teck responded to comments from Siksika Nation on the Information Requirements for Effects Assessment letter from December 9, 2021.	Teck will continue to engage with Siksika Nation throughout the development of the Project.
February 28, 2022	Siksika Nation/Teck Meeting	Teck met with Siksika Nation to discuss Project updates, Teck updates and some specific interests of Siksika Nation's, such as water quality.	Teck will work with Siksika Nation to set up topic-specific meetings as requested.

Table 7.6-1: Engagement with Siksika Nation about the Project

Date	Activity	Comments	Approach to Addressing
March 28, 2022	Siksika Nation/Teck Meeting	Teck met with Siksika Nation to discuss timing of the Readiness Decision, work plan progress and the use of Indigenous knowledge and the Indigenous interest section of the IS/A.	Teck will continue to engage with Siksika Nation on the Indigenous Interests Assessment.
April 8, 2022	Siksika Nation Comments on the Draft Readiness Report	Siksika Nation provided Teck with their comments to the BC EAO on the draft Readiness Report.	Teck acknowledges the feedback provided and will continue to work to engage Siksika Nation on their interests and concerns regarding the Project.
April 13, 2022	Siksika/Kainai (Blood Tribe)/Teck Meeting on Water Quality	Teck met with Kainai and Siksika Nation to discuss water quality in the Elk Valley.	Teck will continue to engage on these topics and will continue to have topic-specific engagement.
April 21, 2022	Indigenous Knowledge Plan	Teck provided Siksika Nation with a draft plan for the use of Indigenous knowledge in the coordinated assessment of the FRX Project.	Teck will continue to engage with Siksika Nation on the Indigenous Interests Assessment.
May 5, 2022	Siksika Nation/Teck Meeting	Teck met with Siksika Nation to discuss the approach to the Indigenous interest section of the IS/A and the use of Indigenous knowledge, the upcoming meeting scheduled for May 27 and work plan progress.	Teck will continue to work with Siksika Nation on the approach to the Indigenous interest section of the IS/A and the use of Indigenous knowledge.
May 27, 2022	Siksika/Kainai/Teck Meeting on Key Environmental Topics	Teck met with Kainai and Siksika Nation on water quality in the Elk Valley, terrestrial wildlife and biodiversity, and the coordinated assessment process.	Teck will work to set a future meeting focused on fish, as requested by Siksika Nation and Kainai.
May 30, 2022	Human Health Receptor Locations for the Human Health Risk Assessment of the Project	Teck provided Siksika Nation with the human health receptor locations for the Human Health Risk Assessment of the Project. Teck requested Siksika Nation review the information and provide feedback by June 30, 2022.	Teck will continue to work with Siksika Nation to share information to support the Siksika Nation's interests in the assessment for the Project.
June 14, 2022	Siksika/Kainai/Teck Meeting on Fish	Teck met with Siksika Nation and Kainai to discuss fish and fish health in the Elk Valley.	Teck will continue to engage Siksika Nation on the Project and will work to advance identified action items.
June 20, 2022	Email Follow-up to Outstanding Questions	Teck followed up with Kainai and Siksika Nation on questions that were posed at the Key Environmental Topics meeting.	Teck will continue to engage with Siksika Nation on the Project and will respond to further questions received following the meeting.
August 8, 2022	Indigenous knowledge Meeting Proposal	Teck followed up with Siksika Nation regarding the plan for the Indigenous Interests section of the IS/A and use of Indigenous knowledge.	Teck will continue to engage with Siksika Nation on the Indigenous Interests Assessment and use of Indigenous knowledge.
September 14, 2022	Community Meeting	Teck visited Siksika Nation community to learn about the history and community interests of Siksika Nation.	Teck will continue to engage with Siksika Nation throughout the development of the Project.
September 29, 2022	Check-in Slides	Teck provided Siksika Nation with the September 29, 2022, presentation slides.	Teck will continue to engage with Siksika Nation throughout the development of the Project.
September 29, 2022	Siksika Nation/Teck Meeting	Teck met with Siksika Nation to discuss the Indigenous Interests section of the IS/A and use of Indigenous knowledge.	Teck will continue to engage with Siksika Nation on the Indigenous Interests Assessment and use of Indigenous knowledge.
October 14, 2022	Secondary Sources	Teck provided Siksika Nation with an updated list of secondary sources to be used in the FRX assessment for review and approval.	Teck will continue to engage with Siksika Nation on the Indigenous Interests Assessment.
October 31, 2022	Siksika Nation/Teck Meeting	Teck met with Siksika Nation to discuss community updates, report timing and next steps.	Teck will continue to engage with Siksika Nation throughout the development of the Project.
November 28, 2022	Draft Table of Contents	Teck provided Siksika Nation with the draft Table of Contents for the Siksika Indigenous Interests chapter for review.	Teck will continue to engage with Siksika Nation on the Indigenous Interests Assessment.
December 12, 2022	Siksika Nation/Teck Meeting	Teck met with Siksika Nation to discuss an update to the Readiness Decision timeline and plan for January 2023 engagement.	Teck will continue to engage with Siksika Nation throughout the development of the Project.
January 31, 2023	Formal Response	Teck provided Siksika Nation with a formal response in acknowledgement of the Siksika Nation Traditional Knowledge and Use Baseline Study previously provided for the FRX Project.	Teck will continue to engage with Siksika Nation throughout the development of the Project.
February 8, 2023	Siksika/Teck In-Person Meeting	Teck and Siksika Nation met in Calgary to discuss the Indigenous Interests section of the IS/A and next steps for working together.	Teck will continue to engage with Siksika Nation on the Indigenous Interests Assessment.
February 27, 2023	Workshop Invitation	Teck provided Kainai and Siksika Nation with an invitation for an in-person Workshop on the FRX Project.	Teck will continue to engage with Siksika Nation on the FRX assessment.
March 7, 2023	Siksika Nation/Teck Meeting	Teck and Siksika met to discuss Project updates, Siksika Nation's work plan and workshops.	Teck will continue to engage with Siksika Nation throughout the development of the Project.
April 11, 2023 April 12, 2023	Workshop	Teck held a two-day in-person workshop with Kainai and Siksika Nation focused on the inclusion of Indigenous knowledge in the a as well as existing conditions.	Teck will continue to engage with Siksika Nation on the FRX assessment.
May 17, 2023	Proposed Engagement	Teck provided Siksika Nation an overview of proposed engagement.	Teck will continue to engage with Siksika Nation throughout the development of the Project.
July 31, 2023	Siksika Nation/Teck Meeting	Teck met with Siksika Nation to discuss the work plan and an ongoing cumulative effects study.	Teck will continue to engage with Siksika Nation throughout the development of the Project.
August 16, 2023	Draft Indigenous Interests chapter	Teck provided Siksika Nation with a draft Indigenous Interests chapter for review.	Teck will continue to engage with Siksika Nation on the Indigenous Interests Assessment.
August 16, 2023	Draft Indigenous Interests Chapter	Siksika Nation confirmed that they would review the draft Indigenous Interests chapter sent on August 16, 2023.	Teck will continue to engage with Siksika Nation on the FRX assessment.
August 17, 2023	Draft Engagement Plan	Teck provided Siksika Nation with draft plan for engagement for review.	Teck will continue to engage with Siksika Nation throughout the development of the Project.
August 17, 2023	SharePoint link	Teck provided Siksika Nation with a link to a shared SharePoint site.	Teck will continue utilize the SharePoint site with Siksika Nation.
August 17, 2023	Siksika Nation/Teck Meeting	Teck met with Siksika Nation to discuss ongoing work, a site visit and the workshop summary.	Teck will continue to engage with Siksika Nation throughout the development of the Project.
September 4, 2023	Project Area Shapefiles	Siksika Nation requested shapefiles from Teck of the Project area.	Teck provided Siksika Nation with the shapefiles.
September 4, 2023	Project Area Shapefiles	Teck provided Siksika Nation with the shapefiles requested.	Teck will continue to engage with Siksika Nation throughout the development of the Project.
September 5, 2023	Site Visit	Teck provided Siksika Nation with information for their site visit on September 5, 2023.	Teck remains committed to supporting logistics for engagement with communities and local Indigenous groups.

Table 7.6-1: Engagement with Siksika Nation about the Project

Date	Activity	Comments	Approach to Addressing
September 20, 2023	Siksika Nation/Teck Meeting	Teck met with Siksika Nation to discuss the recent site visit and future workshops.	Teck will continue to engage with Siksika Nation throughout the development of the Project.
October 18, 2023	Workshop Plan on a Page	Teck provided Siksika Nation with a proposed plan on a page for the upcoming workshop on November 22, 2023.	Teck will continue to engage with Siksika Nation on the FRX assessment.
October 18, 2023	Siksika Nation/Teck Meeting	Teck met with Siksika Nation to discuss Project updates and the upcoming workshop.	Teck will continue to engage with Siksika Nation throughout the development of the Project.
October 24, 2023	Environmental Monitoring Committee Open House	Teck invited Siksika Nation to attend the November 7, 2023, Environmental Monitoring Committee Open House.	Teck will continue to engage with Siksika Nation throughout the development of the Project.
October 31, 2023	Annual Water Quality Open House Invitation	Teck invited Siksika Nation to the Annual Water Quality Open House.	Teck will continue to engage with Siksika Nation throughout the development of the Project.
November 10, 2023	Draft Indigenous Interests Report comments	Teck inquired whether Siksika Nation had any comments on the draft Indigenous Interests Existing Conditions report ahead of the November 22, 2023, workshop in Calgary.	Teck will continue to engage with Siksika Nation on the FRX assessment.
November 16, 2023	Siksika Nation/Teck Meeting	Teck met with Siksika Nation to discuss the sale of the steelmaking coal business and upcoming workshop.	Teck will continue to engage with Siksika Nation throughout the development of the Project.
November 20, 2023	Presentation Slides and Sale News	Teck provided Siksika Nation with the workshop presentation slides and information about the sale of the steelmaking coal business.	Teck will continue to engage with Siksika Nation throughout the development of the Project.
November 22, 2023	Workshop	Teck and Siksika Nation held a workshop in Calgary focused on existing conditions and Indigenous Interests Assessment methods.	Teck will continue to engage with Siksika Nation on the Indigenous Interests Assessment.
December 19, 2023	Year End Appreciation	Teck expressed appreciation to Siksika Nation for the engagement completed in 2023.	Teck will continue to engage with Siksika Nation throughout the development of the Project.
January 16, 2024	November 2023 Workshop Summary	Teck provided Siksika Nation with a summary of the workshop from November 22, 2023, for review.	Teck will continue to engage with Siksika Nation on the FRX assessment.
January 17, 2024	Siksika Nation/Teck Meeting	Teck met with Siksika Nation to discuss Project updates and upcoming workshops.	Teck will continue to engage Siksika Nation on the Project and will work to advance identified action items.
March 4, 2024	New Existing Conditions Reports	Teck provided Siksika Nation that new existing conditions reports had been uploaded to the SharePoint site.	Teck is committed to sharing timely and accurate information with Siksika Nation.
March 20, 2024	Siksika Nation/Teck Meeting	Siksika Nation and Teck met for a meeting to discuss Project updates and upcoming workshops.	Teck will continue to engage Siksika Nation on the Project and will work to advance identified action items.
March 28, 2024	Siksika Nation/Teck Workshop	Teck provided Siksika Nation with the agenda as well as the slide deck in preparation for the April 3, 2024, workshop.	Teck is committed to sharing timely and accurate information with Siksika Nation.
April 3, 2024	Siksika Nation/Teck Workshop	Teck and Siksika Nation met for an in-person workshop to discuss potential effects and mitigations.	Teck will continue to engage with Siksika Nation on the FRX assessment.
April 30, 2024	Workshop Summary	Teck provided Siksika Nation with a summary of the April 3, 2024, workshop.	Teck will continue to engage with Siksika Nation on the FRX assessment.
June 5, 2024	Cross-Cultural Session Confirmation	Teck confirmed the June 25, 2024, date with Siksika Nation for the cross-cultural session.	Teck will continue to engage with Siksika Nation to plan for the June 25 cross-cultural session.
June 19, 2024	Siksika Nation/Teck Meeting	Teck shared with Siksika Nation the meeting schedule details for the June 25, 2024, cross-cultural session.	Teck will continue to work collaboratively with Siksika Nation for the cross-cultural session.
June 19, 2024	Siksika Nation/Teck Meeting	Teck met with Siksika Nation to discuss Project updates and the upcoming cross-cultural session.	Teck will continue to work collaboratively with Siksika Nation for the cross-cultural session.
June 25, 2024	Cross-cultural Session	Teck held the cross-cultural session with Siksika Nation.	Teck will continue to engage with Siksika Nation on the Project and will work to advance identified action items.
July 8, 2024	Glencore Acquisition	Teck announced to Siksika Nation that the acquisition of EVR by Glencore had been approved by the federal government.	EVR will continue to engage with Siksika Nation on the Project and will work to advance identified action items.
July 17, 2024	Siksika Nation/EVR Meeting	EVR met with Siksika Nation to community updates, the regulatory process, environmental considerations, the Revised DPD submission timing and a future site visit.	EVR will continue to engage with Siksika Nation on the Project and will work to advance identified action items.
August 1, 2024	Field Work Planning/Annual Air Quality Monitoring Reports	EVR followed up with Siksika Nation to propose dates for a fieldwork day and shared the 2022 and 2023 Annual Air Quality Monitoring Reports.	EVR remains committed to supporting logistics for engagement with the Siksika Nation.
August 27, 2024	Cultural Day/Request for Review of Indigenous Knowledge	EVR emailed Siksika Nation a summary of the June 2024 cultural day and requested Siksika Nation's review of Indigenous knowledge and key individual's roles at Siksika Nation within the summary.	EVR is committed to sharing timely and accurate information and will continue to engage with Siksika Nation on the development of the Project.
September 23, 2024	Fieldwork Planning	EVR informed and confirmed with Siksika Nation a field visit schedule for October 2–4, 2024.	EVR remains committed to supporting logistics for engagement with Siksika Nation.
October 1, 2024	Archaeology Report	EVR shared the draft Archaeology Existing Conditions report with Siksika Nation.	EVR will continue to engage with Siksika Nation on the report.
October 2, 2024	Siksika Nation Site Visit	Siksika Nation visited the FRX site on October 2–4, 2024, to support their Traditional Land Use study.	EVR is committed to working with Siksika Nation to support various engagement activities including site visits.
October 2, 2024	Archaeology and Water Quality Reports	EVR shared archaeology and water quality reports with Siksika Nation, offering access to additional reports and an invitation to discuss.	EVR will continue to engage with the Siksika Nation on these reports.
December 10, 2024	Siksika Nation Capacity Funding Agreement Update	EVR provided Siksika Nation with an update on the current capacity funding agreement.	EVR will continue to engage with Siksika Nation throughout the development of the Project.
January 29, 2025	Email Update	In lieu of a meeting, EVR provided a short update to Kainai Nation including proposed field visit dates.	EVR remains committed to working collaboratively with Siksika Nation throughout the development of the Project.
February 26, 2025	Siksika Nation/EVR Meeting	EVR met with Siksika Nation to discuss community updates and FRX project updates.	EVR remains committed to working collaboratively with Siksika Nation throughout the development of the Project.
March 26, 2025	Siksika Nation/EVR Meeting	EVR met with Siksika Nation to discuss community updates and FRX project updates.	EVR remains committed to working collaboratively with Siksika Nation throughout the development of the Project.

Table 7.6-1: Engagement with Siksika Nation about the Project

Date	Activity	Comments	Approach to Addressing
May 7, 2025	Siksika Nation/EVR Revised DPD Update Meeting	EVR met with Siksika Nation to provide an update on the changes in the Revised DPD.	EVR remains committed to providing timely information to Siksika Nation throughout the development of the Project.
May 21, 2025	EVR/Siksika Nation Workshop	EVR met with Siksika Nation to collaboratively work on the Indigenous Interest Section of the FRX Project.	EVR remains committed to working collaboratively with Siksika Nation on the FRX Project.
May 22, 2025	EVR visit to Blackfoot Historical Crossing Park	EVR visited Blackfoot Historical Crossing Park to learn more about Siksika perspective, history and culture.	EVR remains committed to learning and understanding Siksika perspectives, history and culture.
June 11, 2025	EVR/Siksika Nation Site Visit	Siksika Nation met with EVR for a site visit at the FRX Project.	EVR remains committed to working collaboratively with Siksika Nation throughout the development of the Project.
June 12, 2025	EVR/Siksika Nation Site Visit	Siksika Nation met with EVR for a site visit at the FRX Project.	EVR remains committed to working collaboratively with Siksika Nation throughout the development of the Project.

Note: In July 2024, Teck Coal Limited (Teck) changed its name to EVR Operations Limited (EVR); refer to Section 1.2.1 for details.

BC EAO= British Columbia Environmental Assessment Office; IPD = Initial Project Description; DPD = Detailed Project Description; KNC = Ktunaxa Nation Council; GBA+ = Gender-Based Analysis Plus; Q&A = question and answer; BC EAA = British Columbia *Environmental Assessment Act*; IAAC = Impact Assessment Agency of Canada; FRX = Fording River Extension; EVR = EVR Operations Limited.

Based on the engagement to date, Siksika Nation identified 13 themes that captured their concerns and interests: ceremonies and cultural resources, cultural continuity, cumulative effects, disturbance of land, governance, and harvesting and traditional use. Key interests and concerns related to these themes include:

- impacts to ability to practise Indigenous and Treaty Rights and cultural and traditional use of lands and resources in and around the Project area and within Alberta, including harvesting plants for food, medicinal and ceremonial (e.g., ochre and 7th paint) purposes
- potential effects on medicinal, ceremonial and edible cultural resources, including Lodgepole pine for Tipi poles, okar/ochre (red, blue, green, yellow, blue/purple), sneezing root, water, fish and fungus, willow, bear root, cedar, sweet pine and licorice root
- disturbance of land in Siksika Nation Traditional Territory and impacts to place-based knowledge and stewardship due to further industrial infrastructure in alpine areas
- impacts to Siksika Nation control and decision making over Blackfoot territories due to inadequate negotiation and consultation processes
- impacts to Siksika Nation's land base due to insufficient monitoring, safety measures and consideration of community knowledge
- impacts to hunting rights, including practices of hunting elk, mule deer, bighorn sheep (a species of cultural importance), moose and occasionally bear
- impacts to the Oldman River[24] system with cultural and environmental importance
- impacts to and protection of wildlife and wildlife habitat, including migratory birds (e.g., eagles), fish (e.g., WCT), bighorn sheep, elk and species important to preparing a Beaver Bundle for ceremony, including consideration of provincial and international transboundary impacts
- widespread contamination of mountain environments (e.g., air quality and coal dust, water quality and selenium) and habitats that support culturally significant resources on which Siksika Nation relies for subsistence, ceremony and the teaching of valuable land-based traditions
- impacts to waterways and the plant and animal habitats they support, whose health and abundance are integral to Siksika Nation's ability to exercise harvesting rights
- impacts to the ability to access key species within critical and unique ecosystems in Blackfoot territory due to mining infrastructure, operation and contamination
- Project interference with legal, spiritual and cultural practices, including sense of place, way of life, transmission of culture from generation to generation and governance
- impacts to knowledge transfer due to deterioration of waters, landscapes and wildlife to states that no longer support the teaching of skills and knowledge
- impacts to camping and gathering sites of cultural, spiritual and historical importance that are important for transmission of traditional culture, knowledge and law
- disruption of the sacred nature of the mountains through impacts to sacred sites, ceremonial locations, spirit beings and all living things
- physical desecration of sacred sites and ancestral heritage resources
- uncertainty and concern for the successful remediation of industrial activity

24 The Oldman River has its headwaters in the eastern slopes of the Rocky Mountains and flows generally eastward to the Bow River and then onto the South Saskatchewan River, eventually draining into Hudson Bay.

- opportunities for future generations to continue Siksika Nation cultural practices in impacted areas
- cumulative effects associated with potential development of other future mining projects

For more detail on interests identified by Siksika Nation during early engagement, and Teck's (now EVR's) responses, refer to Appendix A.

Table 7.6-2 provides a list of engagement activities EVR plans to undertake with Siksika Nation to support the assessment process.

Table 7.6-2: Planned Engagement with Siksika Nation

Item #	Activity
1	Meet with Siksika Nation to continue a collaborative approach for the assessment of potential effects of the Project on Siksika Nation's rights and interests and associated mitigation measures, and to support a collaborative approach to the development of an IS/A that is informed by both Siksika knowledge and western science.

IS/A = Impact Statement/Application.

EVR entered into an agreement with Siksika Nation in June 2021 to facilitate engagement and the collection of data to support the identification of Siksika Nation interests related to the Project. The agreement was updated in 2023.

7.7 Kainai (Blood Tribe)

Kainai (Blood Tribe) is a member of the Blackfoot Confederacy, known as the *Siksikaitsittapi*, and is a signatory of the Blackfoot Treaty of 1877 (No. 7). Treaty 7 covers an area from the BC border to the west, the US border to the south, the Cypress Hills to the east and the Red Deer River to the north. The Project is within Kainai's (Blood Tribe) Traditional Territory, or the *Kitaowahsinnoon* (Blackfoot Traditional Territory), which extends beyond the North Saskatchewan River in the north, the Yellowstone River to the south, the confluence of the North and South Saskatchewan rivers in the east and the Rocky Mountains in the west. The proximity of Reserves 148 and 148A to the Project is presented in Figure 5.1-3.

Kainai (Blood Tribe) is governed by a Chief and 12 Councillors who are elected under a custom electoral system every four years. Blood Tribe Land Management, a department of the Blood Tribe Administration, operates under the authority of Blood Tribe Chief and Council and the Government of Canada to administer and manage land use and occupancy of the Blood Reserves 148 and 148A.

Teck (now EVR) began engaging with Kainai (Blood Tribe) about the Project and hosted a Project introduction meeting in spring 2020 after Kainai (Blood Tribe) identified their interest in participating in the Project. Kainai (Blood Tribe) and EVR are working to develop a collaborative approach for the Assessment of potential effects of the Project on Kainai's (Blood Tribe) rights and interests, which would include a cyclical process of engagement, writing and reviews. EVR acknowledges that Kainai (Blood Tribe) has existing Kainai knowledge and traditional land use information that may be relevant for the Project. EVR is committed to engaging on the applicability of any existing studies or information to the Project and requesting permissions from Kainai (Blood Tribe) for the application of their Kainai knowledge sources. Table 7.7-1 presents engagement with Kainai (Blood Tribe) to date.

Table 7.7-1: Engagement with Kainai (Blood Tribe) about the Project

Date	Activity	Comments	Approach to Addressing
May 5, 2020	Letter from Kainai (Blood Tribe) to the BC EAO	Kainai identified their interest in participating in the Project assessment process under the BC EAA.	Teck will work with Kainai and the BC EAO (and now the IAAC) to identify and evaluate impacts of the Project on Kainai interests.
May 8, 2020	Letter from Kainai and Siksika Nation to Teck	Letter with attached reports providing supplementary information on Blackfoot Traditional Use and Occupancy in the East Kootenays.	Teck reviewed documents to advance understanding of Kainai and Siksika Nation interests in the Project and historical use of the region.
May 13, 2020	Call with Kainai	Teck met with Kainai to introduce Teck's operations in the Elk Valley and the Project, and invited engagement moving forward.	Teck will work with Kainai to develop an appropriate path forward for engagement on the Project.
June 24, 2020	Letter from Kainai to the BC EAO	Letter affirming Kainai intent to participate in the Project assessment process under the BC EAA. Letter included feedback on interests on the Project.	Teck will work with Kainai and the BC EAO (and now the IAAC) to identify and evaluate impacts of the Project on Kainai interests.
June 19, 2020	Letter from Kainai and Siksika Nation to the IAAC	Letter requesting the Project be federally designated under the IAA.	Teck acknowledges the federal designation decision on August 19, 2020, and the potentially affected Indigenous Peoples that may have an interest in the Project.
July 31, 2020	Letter from Kainai and Siksika Nation to the IAAC	Letter re-affirming their request to have the Project federally designated under the IAA.	
September 3, 2020	Proposal on engagement participation provided to Teck by Kainai	Kainai provided Teck with a scope of work to support engagement participation in the Project regulatory process.	Teck will work with Kainai to evaluate the potential Project impacts on their interests.
November 3, 2020	Letter from Kainai to the IAAC	Letter providing feedback on the federal IPD.	Teck acknowledges feedback provided by Kainai and will continue to work with Kainai to evaluate impacts of the Project on Kainai's interests.
December 18, 2020	Kainai DPD Comments	Teck received the comments provided by Kainai to the IAAC and BC EAO on the draft DPD.	Teck has worked to address the comments in the final version of the DPD and/or identify where comments may be addressed later in the regulatory process, as documented in the comment tracking database.
May 27, 2021	Letter from Kainai to KNC, the IAAC and the BC EAO	Kainai provided a letter outlining their position on Aboriginal Rights and Title in southeastern British Columbia.	Teck appreciates and acknowledges the information provided in the letter and will continue to work with Kainai to understand their interests in the Project.
July 29, 2021	DPD Submission	Teck informed Kainai that the DPD had been submitted and outlined the next steps of the assessment process for the Project.	Teck expressed its commitment to continued engagement with communities and potentially affected Indigenous Peoples as the assessment moves forward in accordance with the requirements for engagement set by the IAAC and BC EAO.
August 11, 2021	Technical Advisors Meeting for the Readiness Decision Phase	IAAC and BC EAO technical advisors met to discuss the Readiness Decision Phase. The agenda included FRX Project overview, Project Q&A, coordinated assessment process, assessment process Q&A, closing and next steps.	Teck expressed its commitment to continued engagement with communities and potentially affected Indigenous Peoples as the assessment moves forward in accordance with the requirements for engagement set by the IAAC and BC EAO.
September 2, 2021	Kainai/Teck Meeting	Teck met with Kainai to discuss the Project, work plan deliverables, schedule, GBA+ and a site visit.	Teck will work with Kainai to advance a work plan and a site visit.
September 3, 2021	GBA+ memo	Teck provided Kainai with the GBA+ memo discussed in the September 2, 2021, check-in meeting and followed up on the possibility of a site tour visit.	Teck will work with Kainai to advance GBA+ scope of work per Kainai's preference. Teck expressed its commitment to continued engagement with Kainai as the assessment moves forward in accordance with the requirements for engagement set by the IAAC and BC EAO.
November 29, 2021	Meeting request	Teck followed up with Kainai on the October 28, 2021, email requesting a check-in meeting.	Teck will await to hear Kainai's availability for a meeting.
December 2, 2021	Email Requesting a Meeting and Information Requirements for Effects Assessment letter provided	Teck followed up with Kainai to have a meeting before the holidays and provided Kainai with a letter seeking review and input into several aspects of Teck's assessment of potential effects on Indigenous interests. Teck requested that Kainai provide a response by January 7, 2022.	Teck will continue to engage with Kainai on the Indigenous Interests Assessment.
January 7, 2022	Kainai Preliminary Comments on the Information Requirements for Effects Assessment	Kainai provided Teck with preliminary comments on the Information Requirements for Effects Assessment letter.	Teck thanks Kainai for their contribution and will review the package and reach out if there are further questions.
February 4, 2022	Teck response to the Information Requirements for Effects Assessment comments	Teck responded to comments from Kainai on the Information Requirements for Effects Assessment letter from January 7, 2022.	Teck is committed to further understanding Kanai's interests by continuing to engage with Kainai throughout the Project.
April 8, 2022	Kainai Comments on the Draft Readiness Report	Kainai provided Teck with their comments to the BC EAO on the Draft Readiness Report. The letter outlined Kainai's support for a coordinated federal and provincial review and recommendation to proceed with the assessment and Process Planning stage.	Teck acknowledges the feedback provided and will continue to work to engage Kainai on their interests assessment regarding the Project.
April 13, 2022	Kainai/Siksika/Teck Meeting on Water Quality	Teck held a meeting with Kainai and Siksika on Water Quality in the Elk Valley.	Teck is committed to ongoing engagement on these topics and will continue to have topic-specific engagement.
May 27, 2022	Kainai/Siksika/Teck Meeting on Key Environmental Topics	Teck met with Kainai and Siksika on water quality in the Elk Valley, terrestrial wildlife and biodiversity, and the coordinated assessment process.	Teck is committed to ongoing engagement on these topics and will continue to have topic-specific engagement.
May 30, 2022	Human health receptor locations for the Human Health Risk Assessment of the Project	Teck provided Kainai with the human health receptor locations for the Human Health Risk Assessment of the Project and requested Kainai to review the information and provide feedback to Teck by June 30, 2022.	Teck will continue to engage with Kainai throughout the development of the Project.
June 20, 2022	Follow-up on questions from the Key Environmental Topics meeting	Teck provided responses via email to Kainai and Siksika on some of the outstanding questions asked during the May 27, 2022, Key Environmental Topics meeting.	Teck will continue to provide responses to questions as they are raised.
August 3, 2022	EVWQP Update	Teck provided Kainai with an update on the EVWQP.	Teck will continue to engage with Kainai throughout the development of the Project.

Table 7.7-1: Engagement with Kainai (Blood Tribe) about the Project

Date	Activity	Comments	Approach to Addressing
October 14, 2022	Assessment Secondary Sources	Teck provided Kainai with an updated list of secondary sources to be used in the FRX assessment for Kanai's review and approval.	Teck will continue to engage with Kainai on the FRX assessment.
February 9, 2023	Teck/Kainai In-Person Meeting	Teck and Kainai met in person to discuss the Indigenous Interests section of the IS/A and next steps for increased regular engagement.	Teck will continue to engage with Kainai on the Indigenous Interests Assessment.
February 17, 2023	TK Documents	Kainai provided Teck with the TK and Use Baseline Report.	Teck will continue to engage with Kainai throughout the development of the Project.
February 27, 2023	Workshop Invitation	Teck provided Kainai and Siksika with an invitation for an in-person Workshop on the FRX Project.	Teck will continue to engage with Kainai on the FRX assessment.
March 14, 2023	Kainai/Teck Meeting	Teck met with Kainai to discuss the potential company separation update, Project updates, and the April workshop.	Teck will continue to engage with Kainai throughout the development of the Project.
March 14, 2023	Workshop Materials	Teck provided Kainai with the April 11 and 12, 2023, workshop presentation slides.	Teck will continue to engage with Kainai on the FRX assessment.
April 4, 2023	TK Baseline Response	Teck provided Kainai with a formal response to the recommendations in the Kainai TK and Land Use Baseline Study report.	Teck will continue to engage with Kainai on their interests and concerns.
April 11, 2023 April 12, 2023	Workshop	Teck held a two-day in-person workshop with Kainai and Siksika focused on the inclusion of Indigenous knowledge in the assessment as well as existing conditions.	Teck will continue to engage with Kainai on the FRX assessment.
August 16, 2023	Updated Draft Table of Contents Outlining the Indigenous Interest Chapter	Teck provided Kainai with an updated draft table of contents outlining the Indigenous Interests chapter of the Project assessment.	Teck will continue to engage with Kainai on the Indigenous Interests Assessment.
August 16, 2023	Draft Table of Contents	Kainai informed Teck they received the draft Table of Contents documents.	Teck will continue to engage with Kainai on the Indigenous Interests Assessment.
October 25, 2023	EMC Open House Invitation	Teck invited Kainai to attend the November 7 EMC Open House.	Teck will continue to engage with Kainai throughout the development of the Project.
October 25, 2023	Kainai/Teck Check-in Meeting	Teck met with Kainai to discuss Project updates including concerns about the impacts of the Project on water.	Teck will continue to engage with Kainai on their interests and concerns.
October 31, 2023	Teck Annual Water Quality Open House	Teck invited Kainai to their November 15 Annual Water Quality Open House.	Teck will continue to engage with Kainai on their interests and concerns.
November 20, 2023	Sale News	Teck provided Kainai with information about the sale of the steelmaking coal business.	Teck will continue to engage with Kainai throughout the development of the Project.
December 19, 2023	Year End Appreciation	Teck expressed appreciation to Kainai for the engagement completed in 2023.	Teck will continue to engage with Kainai throughout the development of the Project.
January 8, 2024	Meeting Logistics	Teck provided Kainai with potential dates for a new ongoing regular check-in schedule to connect on progress and share updates on the Project.	Teck remains committed to supporting logistics for engagement with Kainai (Blood Tribe).
January 9, 2024	Meeting Logistics	Kainai informed Teck of Kainai's availability for the February meeting.	Teck remains committed to supporting logistics for engagement with Kainai (Blood Tribe).
January 17, 2024	Draft Chapter	Teck provided Kainai with a partial draft Indigenous Interests Chapter and requested their review.	Teck will continue to engage with Kainai (Blood Tribe) on the Indigenous Interests Assessment.
February 6, 2024	Kainai/Teck Meeting	Teck met with Kainai to discuss Project updates and planning for engagement in 2024.	Teck will continue to engage with Kainai (Blood Tribe) throughout the development of the Project.
July 10, 2024	Fall 2024 Workshop Scheduling for Indigenous Interests Chapter	Teck proposed a full-day in-person workshop with Kainai (Blood Tribe) to discuss how Teck can support the Indigenous Interests chapter of the IS/A. Teck requested Kainai Blood Tribe's availability for field visits prior to winter 2024 (before snowfall).	EVR will continue to engage with Kainai Blood Tribe on the Indigenous Interests Assessment.
July 11, 2024	Glencore Acquisition	Teck announced to Kainai (Blood Tribe) that the acquisition of EVR by Glencore had been approved by the federal government.	EVR will continue to engage with Kainai Blood Tribe on the Project and will work to advance identified action items.
September 19, 2024	Site Visit Preparation	EVR informed Kainai (Blood Tribe) that a site visit could only be accommodated from September 25–28, 2024, due to capacity constraints and upcoming closures.	EVR remains committed to supporting logistics for engagement with Kainai (Blood Tribe).
October 15, 2024	Kainai (Blood Tribe)/EVR Meeting	EVR met with Kainai (Blood Tribe) to plan and discuss the upcoming October 30, 2024, workshop.	EVR will continue to engage with the Kainai (Blood Tribe) throughout the development of the Project.
October 21, 2024	Co-Authorship Methods Workshop	EVR shared details with Kainai (Blood Tribe) of the Co-Authorship Methods workshop to initiate co-authorship of the Indigenous Interests section for the Project.	EVR will continue to engage with the Kainai (Blood Tribe) throughout the development of the Project.
November 20, 2024	Invitation on Water Quality Open House	EVR emailed Kainai (Blood Tribe) an update on the annual Water Quality Open House scheduled for November 26, 2024, and extended an invitation to the event.	EVR is committed to sharing timely and accurate information with Kainai (Blood Tribe).
November 20, 2024	Response to Invitation on Water Quality Open House	Kainai (Blood Tribe) responded to EVR's invitation to the November 2024 Water Quality Open House, emphasizing their status as rightsholders rather than stakeholders.	EVR responded to Kainai (Blood Tribe) acknowledging their rightsholder status. EVR will continue to engage with Kainai (Blood Tribe) throughout the development of the Project.
December 10, 2024	Co-Authorship Workshop Summary	EVR shared a summary of the October 30, 2024, methods workshop with Kainai (Blood Tribe) for review.	EVR is committed to sharing timely and accurate information with Kainai (Blood Tribe).
December 19, 2024	Kainai (Blood Tribe)/EVR Meeting	EVR met with Kainai (Blood Tribe) to discuss the December 10, 2024, memorandum and October 30, 2024, workshop.	EVR will continue to engage with the Kainai (Blood Tribe) throughout the development of the Project.
March 20, 2025	Kainai (Blood Tribe)/EVR Meeting	EVR met with Kainai (Blood Tribe) to discuss project updates and community updates.	EVR remains committed to working collaboratively with Kainai (Blood Tribe) throughout the development of the Project.
March 25, 2025	Request for Review and Information Sources Request	EVR requested review and feedback from Kainai (Blood Tribe) on the May and April 2023 workshop summaries to integrate Kainai Knowledge into the FRX Project Joint Federal and Provincial Impact Statement Application (IS/A).	EVR remains committed to working collaboratively with Kainai (Blood Tribe) throughout the development of the Project.

Table 7.7-1: Engagement with Kainai (Blood Tribe) about the Project

Date	Activity	Comments	Approach to Addressing
May 8, 2025	Kainai (Blood Tribe)/EVR Revised DPD Update Meeting	EVR met with Kainai (Blood Tribe) to provide an update on the changes in the Revised DPD.	EVR remains committed to providing timely information to Kainai (Blood Tribe) throughout the development of the Project.
June 11, 2025	EVR/Kainai (Blood Tribe) Site Visit	Kainai (Blood Tribe) met with EVR for a site visit at the FRX Project.	EVR remains committed to working collaboratively with Kainai (Blood Tribe) throughout the development of the Project.
June 12, 2025	EVR/Kainai (Blood Tribe) Site Visit	Kainai (Blood Tribe) met with EVR for a site visit at the FRX Project.	EVR remains committed to working collaboratively with Kainai (Blood Tribe) throughout the development of the Project.
June 26, 2025	EVR/Kainai (Blood Tribe) Workshop	EVR met with Kainai (Blood Tribe) to work collaboratively on the Indigenous Interest Section of the FRX Project.	EVR remains committed to working collaboratively with Kainai (Blood Tribe) on the Project and on the Indigenous Interest Section.

Note: In July 2024, Teck Coal Limited (Teck) changed its name to EVR Operations Limited (EVR); refer to Section 1.2.1 for details.

BC EAO= British Columbia Environmental Assessment Office; BC EAA= British Columbia *Environmental Assessment Act*; IAAC= Impact Assessment Agency of Canada; IPD = Initial Project Description; DPD = Detailed Project Description; FRX= Fording River Extension; GBA+ = Gender-Based Analysis Plus; Q&A = question and answer; KNC = Ktunaxa Nation Council; EVWQP = Elk Valley Water Quality Plan; TK = Traditional knowledge; EMC= Environmental Monitoring Committee IS/A = Impact Statement/Application; EVR= EVR Operations Limited

Kainai (Blood Tribe) have indicated that the area around the Project was used for travel, trade, harvesting and ceremonial purposes and continues to be an area of importance.

Based on the engagement, and report sharing to date, interests and concerns identified by the Kainai (Blood Tribe) include:

- impacts to the ability to practise Indigenous and Treaty Rights and cultural and traditional use of lands and resources in and around the Project area and within Alberta, including harvest of plants (e.g., stems, roots and berries) for food, medicinal and ceremonial purposes
- disturbance to land in Kainai (Blood Tribe) Traditional Territory, including:
  - impacts to a parcel of land near Coleman, Alberta, about 60 km from the Project and used as a base to support Kainai (Blood Tribe) members' exercise of Treaty Rights and traditional land uses in the Crowsnest Pass region
  - impacts to the Oldman River system with cultural and environmental importance
  - ongoing historical and contemporary exclusion and restricted access to the Traditional Territory as a result of industry fences and gates, privatization, parkland designation, graze-leasing and recreational land use
  - Project interference with legal, spiritual and cultural practices, including sense of place, way of life, transmission of culture from generation to generation and governance
  - impacts to camping; physical heritage; and gathering sites of cultural, spiritual and historical importance that are important for transmission of traditional culture, knowledge and law
  - impacts to hunting rights, including practices of hunting elk, mule deer, bighorn sheep (a species of cultural importance), moose and occasionally bear
- provincial and international transboundary impacts to wildlife, habitat and water quality, including:
  - impacts to game, fish, plants and freshwater from industrial, agricultural and urban-source contamination
  - protection of wildlife and wildlife habitat and migratory patterns, including migratory birds, fish (e.g., WCT) and bighorn sheep
  - air and water quality and effective mitigation measures
- cumulative effects associated with potential development of other future mining projects on Kainai (Blood Tribe) rights, including:
  - loss of access to non-contact water
  - loss of access to land for harvesting and traditional use
  - a reduction in quality of resources such as soil, air, plants and medicines
  - loss of cultural continuity
  - loss of governance and jurisdiction
  - climate change and natural disasters
- data collection and availability of information regarding industrial activity and remediation efforts
- ongoing settler land use policy prioritizing short-term financial benefits over local and immediate environmental and social impacts

For more detail on interests identified by Kainai (Blood Tribe) during early engagement, and Teck's (now EVR's) responses, refer to Appendix A.

Table 7.7-2 provides a list of engagement activities EVR plans to undertake with Kainai (Blood Tribe) to support the assessment process.

Table 7.7-2: Planned Engagement with Kainai (Blood Tribe)

Item #	Activity
1	Meet with Kainai (Blood Tribe) to continue a collaborative approach for the assessment of potential effects of the Project on Kainai (Blood Tribe)'s rights and interests and associated mitigation measures, and to support a collaborative approach to the development of an IS/A that is informed by both Kainai knowledge and western science.

IS/A = Impact Statement/Application

Teck (now EVR) entered into an agreement with Kainai (Blood Tribe) in June 2021 to facilitate engagement and the collection of data to support the identification of Kainai (Blood Tribe) interests related to the Project. The agreement was updated in 2024.

7.8 Tsuut'ina Nation

Tsuut'ina Nation, also known as *Dzánágù-hí Nīhīgúnījà* (the Dene people of Tsuut'ina Nation), are an Athapaskan-speaking people located in present-day Alberta. Tsuut'ina Nation is a signatory to the Blackfoot Treaty of 1877 (No. 7), which covers an area from the BC border to the west, the US border to the south, Cypress Hills to the east and the Red Deer River to the north. Their Traditional Territory extends west along the BC border from Kakwa Provincial Park to Woodland County in Alberta in the north, Paintearth County in the east and past the US border to the south. The community has one reserve, Tsuut'ina Nation 145, which is located west of Calgary. The proximity of the Project to Tsuut'ina Nation 145 is presented in Figure 5.1-3.

Tsuut'ina Nation is committed to protecting, conserving and controlling their lands and resources and maintaining their unique culture, identity, traditions and language (Tsuut'ina Nation 2017). Their Traditional Territory has provided and continues to provide an abundance of wildlife, medicinal and cultural resources, and is where Tsuut'ina Nation continues traditional and cultural land use practices (Tsuut'ina Nation 2020).

Tsuut'ina Nation is led by a Chief and 12 Councillors (Government of Alberta 2020a). Tsuut'ina Nation is a signatory to the First Nations Land Management Agreement but has elected to be inactive and has not yet ratified a land code to operationalize governance and management control of Tsuut'ina Nation land and natural resources.

Teck (now EVR) began engaging with Tsuut'ina Nation about the Project in early 2021 and hosted a Project introduction meeting in spring 2021. EVR acknowledges that Tsuut'ina Nation has existing Indigenous knowledge and traditional land use information that may be relevant for the Project. EVR is committed to engaging on the applicability of any existing studies or information to the Project and requesting permissions from Tsuut'ina Nation for the application of their Indigenous knowledge sources. Table 7.8-1 provides a list of engagement activities EVR has undertaken to date with Tsuut'ina Nation.

Table 7.8-1: Engagement with Tsuut'ina Nation about the Project

Date	Activity	Comments	Approach to addressing
November 6, 2020	Letter from the Tsuut'ina Nation to the IAAC	Letter providing feedback on the federal IPD.	Teck acknowledges feedback provided by the Tsuut'ina Nation and proposes to continue to work with Tsuut'ina Nation to evaluate impacts of the Project on Tsuut'ina Nation interests.
February 16, 2021	Letter to Tsuut'ina Nation from Teck	Letter to introduce Teck and the Project, and to provide opportunity for future engagement.	Teck will address any follow-up correspondence with further engagement as appropriate.
March 24, 2021	Teck email invitation to engage	Teck sent an email to follow up on the previous letter sent to Tsuut'ina Nation to ask if they would like to engage on the Project.	Teck remains open to engagement with Tsuut'ina Nation and their interests in the Project.
May 21, 2021	Tsuut'ina Nation/Teck Meeting	Teck met with Tsuut'ina Nation to do introductions and discuss future engagement.	Teck will continue to work with Tsuut'ina Nation to understand their interests in the Project.
June 9, 2021	Tsuut'ina Nation/Teck Meeting	Teck met with Tsuut'ina Nation for a Project Introduction and for Tsuut'ina Nation to share some information about their history and culture.	Teck will continue to work with Tsuut'ina Nation to understand their interests in the Project.
July 31, 2021	DPD submission	Teck informed Tsuut'ina Nation that the DPD had been submitted and explained the following steps of the assessment process for the Project.	Teck expressed its commitment to continued engagement with communities and potentially affected Indigenous Peoples as the assessment moves forward in accordance with the requirements for engagement set by the IAAC and BC EAO.
August 23, 2021	Tsuut'ina Nation/Teck Meeting	Teck met with Tsuut'ina Nation to discuss the DPD submission and regulatory process.	Teck will continue to engage with Tsuut'ina Nation on the Project and will work to advance identified action items.
December 2, 2021	Information Requirements for Effects Assessment Letter	Teck provided Tsuut'ina Nation with a letter seeking review and input into several aspects of Teck's assessment of potential effects on Indigenous interests.	Teck will await feedback on the Information Requirements for Effects Assessment letter.
April 25, 2022	Teck Email Response	Teck provided Tsuut'ina Nation with Teck documents related to the FRX Project and their approach on different topics, as requested by Tsuut'ina Nation to support community meetings.	Teck will continue to be responsive to information requests as they are made.
May 18, 2022	Tsuut'ina Nation /Teck In-Person Meeting	Teck met with Tsuut'ina Nation in person to discuss Project updates and work plan progress.	Teck will continue to engage with Tsuut'ina Nation on the Project and will work to advance identified action items.
May 20, 2022	Tsuut'ina Nation Interests Report	Teck received the Tsuut'ina Nation Preliminary Interests Report.	Teck appreciates the effort Tsuut'ina Nation put into developing this report. Teck will review and let Tsuut'ina Nation know if there are any questions.
May 30, 2022	Human Health Receptor Locations for the Human Health Risk Assessment of the Project	Teck provided Tsuut'ina Nation with the human health receptor locations for the Human Health Risk Assessment of the Project and requested Tsuut'ina Nation to review the information and provide feedback to Teck by June 30, 2022.	Teck will continue to engage with Tsuut'ina Nation throughout the development of the Project.
July 5–6, 2022	Tsuut'ina Nation Site Visit	Tsuut'ina Nation came to site and met with Teck in person to conduct cultural practices and fieldwork.	Teck participated in and supported Tsuut'ina Nation's site visit. Teck will support future site visits as requested.
July 20, 2022	Teck Response to Tsuut'ina Nation Preliminary Interests Report	Teck provided a letter response to Tsuut'ina Nation Preliminary Interests Report recommendations.	Teck will work with Tsuut'ina Nation to advance next steps on recommendations made in the Interests Report.
August 3, 2022	EVWQP Update	Teck provided Tsuut'ina Nation with an update on the EVWQP.	Teck will continue to engage with Tsuut'ina Nation throughout the development of the Project.
August 9, 2022	Agreement to support Tsuut'ina Nation's Participation	Teck followed up with Tsuut'ina Nation regarding the draft agreement for Tsuut'ina Nation participation in the Project and list of secondary sources.	Teck will continue to engage with Tsuut'ina Nation throughout the development of the Project.
August 11, 2022	Teck Site Visit	Teck held a site visit for Tsuut'ina Nation to support data collection.	Teck will continue to engage with Tsuut'ina Nation throughout the development of the Project.
October 14, 2022	Secondary Sources	Teck provided Tsuut'ina Nation with an updated list of secondary sources to be used in the FRX assessment for review and approval.	Teck will continue to work with Tsuut'ina Nation on the FRX assessment.
January 31, 2023	Formal Response	Teck provided Tsuut'ina Nation with a formal response in acknowledgement of the Tsuut'ina Nation Final Traditional Land Use Study Report.	Teck will continue to work with Tsuut'ina Nation on the Tsuut'ina Nation Final Traditional Land Use Study Report.
February 9, 2023	Tsuut'ina Nation/Teck Meeting	Teck met with Tsuut'ina Nation to discuss participation support for 2023 and areas of interest including reclamation and water treatment.	Teck will continue to engage with Tsuut'ina Nation throughout the development of the Project.
May 16, 2023	Teck Site Visit	Teck hosted a site tour for Tsuut'ina Nation focused on water quality.	Teck will continue to engage with Tsuut'ina Nation throughout the development of the Project.
August 30, 2023	Contact Information	Teck updated Tsuut'ina Nation with contact information for a new team member and proposed a meeting.	Teck will continue to engage with Tsuut'ina Nation throughout the development of the Project.
September 6, 2023	Tsuut'ina Nation/Teck Meeting	Teck met with Tsuut'ina Nation to discuss Project updates.	Teck will continue to engage with Tsuut'ina Nation throughout the development of the Project.
September 7, 2023	Fieldwork Logistics	Tsuut'ina Nation shared with Teck that their Project manager would provide details for upcoming fieldwork.	Teck will continue to support Tsuut'ina Nation in planning their fieldwork.
September 7, 2023	Project Footprint Shapefiles	Teck provided Tsuut'ina Nation with the Project footprint shapefiles and contact information.	
September 8, 2023	Fieldwork Dates	Tsuut'ina Nation requested map files in PDF format and informed Teck they had fieldwork scheduled for the week of September 18, 2023.	Teck will provide Tsuut'ina Nation with a PDF map of the site.
September 11, 2023	FRX Map	Teck provided Tsuut'ina Nation with a PDF map of the FRX site.	Teck will continue to support Tsuut'ina Nation in planning their fieldwork.
September 11, 2023	Site Visit Schedule	Tsuut'ina Nation provided Teck with a schedule and inquired if Teck was available to support them on site.	
September 13, 2023	Additional Site Visit Details	Teck provided Tsuut'ina Nation with additional details on Tsuut'ina Nation's site visit for September 19, 2023.	
September 14, 2023	Site Visit location and coordinates	Teck provided the meeting location for the site visit with Tsuut'ina Nation.	

Table 7.8-1: Engagement with Tsuut'ina Nation about the Project

Date	Activity	Comments	Approach to addressing
September 19, 2023	Ceremony and Site Visit	Teck and Tsuut'ina Nation participated in a Ceremony near the Project with Tsuut'ina Nation Elders and staff. Tsuut'ina Nation also conducted fieldwork on the FRX site on September 20 and 21, 2023.	Teck will continue to engage with Tsuut'ina Nation throughout the development of the Project.
October 24, 2023	EMC Open House	Teck invited Tsuut'ina Nation to attend the November 7, 2023, EMC Open House.	Teck will continue to engage with Tsuut'ina Nation throughout the development of the Project.
October 31, 2023	Annual Water Quality Open House Invitation	Teck invited Tsuut'ina Nation to their November 15, 2023, Annual Water Quality Open House.	Teck will continue to engage with Tsuut'ina Nation throughout the development of the Project.
November 20, 2023	Sale News	Teck provided Tsuut'ina Nation with information about the sale of the steelmaking coal business.	Teck will continue to engage with Tsuut'ina Nation throughout the development of the Project.
December 8, 2023	Report Extension Request	Tsuut'ina Nation called Teck to provide an update on their site visit report.	Teck confirmed with Tsuut'ina Nation that the report could be provided at a later date.
December 15, 2023	TLU Report	Tsuut'ina Nation provided Teck with the 2023 Tsuut'ina Nation TLU Study Report.	Teck appreciates the effort Tsuut'ina Nation put into developing this report. Teck will review and let Tsuut'ina Nation know if there are any questions.
December 18, 2023	TLU Report Acknowledgement	Teck thanked Tsuut'ina Nation for providing the 2023 Tsuut'ina Nation TLU Study Report.	Teck will continue to engage with Tsuut'ina Nation throughout the development of the Project.
December 19, 2023	Year End Appreciation	Teck expressed appreciation to Tsuut'ina Nation for the engagement completed in 2023.	Teck will continue to engage with Tsuut'ina Nation throughout the development of the Project.
February 27, 2024	Tsuut'ina Nation/Teck Meeting	Teck followed up with Tsuut'ina Nation to confirm their February 28 in-person meeting.	Tsuut'ina Nation informed Teck they would re-schedule the in-person meeting. Teck remains committed to engagement with Tsuut'ina Nation.
April 17, 2024	Traditional Land Use Study	Teck provided Tsuut'ina Nation with a response to the Traditional Land Use Study that Tsuut'ina provided at the end of 2023, after the September 2023 site visit.	Teck will continue to engage with Tsuut'ina Nation on the FRX assessment.
May 6, 2024	Tsuut'ina Nation/Teck Meeting	Teck met with Tsuut'ina Nation to discuss Project updates, work planned for 2024, and upcoming community engagement events.	Teck provided Tsuut'ina Nation with a road network map on May 7, 2024, as an action item from the May 6, 2024, check-in meeting and will continue to engage with Tsuut'ina Nation.
May 7, 2024	Agreement Discussions	Tsuut'ina Nation asked Teck about the budget amount within their current work plan.	Teck responded to Tsuut'ina Nation's question on the amount requested for the work plan and remaining work to be delivered according to the initial agreement.
May 7, 2024	Road Network Map	Teck provided Tsuut'ina Nation with a road network map as discussed at the May 6, 2024, meeting.	Teck will continue to engage with Tsuut'ina Nation on the Project and will work to advance identified action items.
July 2, 2024	Site Visit Schedule	Teck confirmed with Tsuut'ina Nation the dates and meeting schedule for the July 22–24 site visit.	Teck will continue to work collaboratively with Tsuut'ina Nation to prepare for the site visit.
July 8, 2024	Sale News	Teck communicated to Tsuut'ina Nation the sale of its coal assets to Glencore, indicating the sale will be finalized on July 11, 2024.	Teck will continue to engage with Tsuut'ina Nation on the Project and will work to advance identified action items.
July 11, 2024	Glencore Acquisition	Teck announced to Tsuut'ina Nation that the acquisition of EVR by Glencore had been approved by the federal government.	EVR will continue to engage with Tsuut'ina Nation on the Project and will work to advance identified action items.
July 22, 2024	Site Visit	EVR organized a two-day site visit with Tsuut'ina Nation, which included a pipe ceremony.	EVR will continue to engage with Tsuut'ina Nation on the Project and will work to advance identified action items.
November 20, 2024	Invitation on Water Quality Open House	EVR emailed Tsuut'ina Nation an update on the annual Water Quality Open House scheduled for November 26, 2024, and extended an invitation to the event.	EVR is committed to sharing timely and accurate information with Tsuut'ina Nation.
February 18, 2025	Tsuut'ina Nation/EVR Meeting	EVR met with Tsuut'ina at their office for a check in meeting to discuss community updates and project updates.	EVR will continue to engage with Tsuut'ina Nation on the Project and will work to advance identified action items.
March 18, 2025	Tsuut'ina Nation Elders Meeting Presentation	EVR presented at an Elders Meeting about the FRX Project.	EVR appreciates the feedback provided and looks forward to future opportunities to engage directly with Tsuut'ina Elders and Citizens.
May 8, 2025	Tsuut'ina Nation/EVR Revised DPD Update Meeting	EVR met Tsuut'ina Nation in person in Elkford to provide an update on the changes in the Revised DPD.	EVR remains committed to providing timely information to Tsuut'ina Nation throughout the development of the Project.
June 17, 2025	EVR/Tsuut'ina Nation Site Visit	EVR met with Tsuut'ina Nation for a Ceremony and site visit at the FRX Project focused on reclamation.	EVR remains committed to working collaboratively with Tsuut'ina Nation throughout the development of the Project.

Note: In July 2024, Teck Coal Limited (Teck) changed its name to EVR Operations Limited (EVR); refer to Section 1.2.1 for details.

IAAC= Impact Assessment Agency of Canada; BC EAO= British Columbia Environmental Assessment Office; IPD = Initial Project Description; DPD = Detailed Project Description; FRX= Fording River Extension; EMC = Environmental Monitoring Committee; EVWQP = Elk Valley Water Quality Plan; TLU = Traditional Land Use; EVR= EVR Operations Limited

Based on the letter submitted to IAAC on November 6, 2020, and report sharing to date, interests and concerns identified by Tsuut'ina Nation include:

- understanding the proposed expansion area of the Project, specifically at seasonal junctures
- ability to harvest medicinal plants and teepee poles from undisturbed areas in the Project area prior to the Construction Phase
- cultural findings in the Project area, including minerals used for ceremonies
- disturbance to pipe ceremony markers
- ability to practise traditional land management, including controlled burning to mitigate wildfires
- protection of animal migration routes
- protection of mountain and boreal forest ecosystems and species such as grizzly bear, lumber pine, whitebark pine and mountain little root
- cumulative effects related to access and reduction of "areas of solitude," thereby impacting ability to conduct undisturbed traditional activities
- changes to sensory and visual experience on the landscape
- impacts of climate change on lands and resources, such as the observed later blooming season for berries and plants
- effects of dust on human health
- water quality and the ability for water to support natural ecosystems and drinking water for animals and people
- water well monitoring for contamination, hydrogen sulphide gas and sour gas as well as appropriate mitigation (e.g., fencing around creeks)
- employment and business opportunities for community members (Tsuut'ina Nation 2022)

Table 7.8-2 provides a list of engagement activities EVR plans to undertake engagement with Tsuut'ina Nation to support the assessment process.

Table 7.8-2: Planned Engagement with Tsuut'ina Nation

Item #	Activity
1	Meet with Tsuut'ina Nation to discuss in more detail the interests in the Project and a path forward for continued engagement and mitigating potential effects of the Project.

Teck (now EVR) entered into an agreement with Tsuut'ina Nation in 2023 to facilitate engagement and the collection of data to support the identification of Tsuut'ina interests related to the Project.

7.9 Otipemisiwak Métis Government

Métis in Canada are a distinct cultural group with their own traditions, language and cultural practices that arose from a shared history and heritage of mixed European and Indigenous ancestry. Otipemisiwak Métis Government (previously the Métis Nation of Alberta) reside throughout the province in various communities and Métis Settlements. Métis Settlements are unique to Alberta and were established through the *Métis Population Betterment Act* (SA 1938(2), c 6); of the original 12, 8 Métis Settlements remain, and all are located northeast of the Project. Figure 5.1-3 displays the proximity of the closest Métis Settlements to the Project along with the Otipemisiwak Métis Government district boundaries.

Otipemisiwak Métis Government is divided into 22 administrative districts that fall under five territories. The Battle River Territory, consisting of Districts 1 to 6, is located in southern Alberta within the Métis Homeland (Manitoba, Saskatchewan, Alberta, Northwest Territories and parts of BC, Ontario and the northern US). District 1, Foothills Métis District, and District 4, Rocky View Métis District, are the closest Battle River Districts to the Project.

The Battle River Territory consists of urban areas, parks, wildland areas and nature reserves. This environment, including the Kootenay Region of BC, provides an abundance of resources to Métis land users. Land use has and continues to consist of social, cultural and spiritual gathering areas and harvesting activities, including fishing, hunting, trapping and gathering of edible and medicinal plants (Otipemisiwak Métis Government et al. 2022).

The Otipemisiwak Métis Government is governed by a president, women's representative, youth representative and 22 distinct representatives (Otipemisiwak Métis Government 2024a). To facilitate consultation activities, each of its five administrative regions and the local councils have entered into Regional Consultation Protocols, creating a one-window approach to consultation with Otipemisiwak Métis Government. Five regional consultation offices are tasked with facilitating consultation between proponents, the Crown and affected Métis Citizens at the local, regional and provincial levels.

Teck (now EVR) began engaging with Otipemisiwak Métis Government about the Project and hosted a Project introduction meeting in early 2020. EVR acknowledges that Otipemisiwak Métis Government has existing Indigenous knowledge and traditional land use information that may be relevant for the Project. EVR is committed to engaging on the applicability of any existing studies or information to the Project and requesting permissions from Otipemisiwak Métis Government for the application of their Indigenous knowledge sources. Table 7.9-1 presents engagement with Otipemisiwak Métis Government to date.

Table 7.9-1: Engagement with Otipemisiwak Métis Government about the Project

Date	Activity	Comments	Approach to addressing
November 2, 2020	Letter from the Otipemisiwak Métis Government to the IAAC	Letter providing feedback on the federal IPD.	Teck acknowledges feedback provided by the Otipemisiwak Métis Government and proposes to continue to work with Otipemisiwak Métis Government to evaluate impacts of the Project on Otipemisiwak Métis Government's interests.
January 20, 2020	Otipemisiwak Métis Government/Teck Meeting	Teck met with the Otipemisiwak Métis Government to introduce the Project and the Otipemisiwak Métis Government indicated some high level interests and concerns.	The Otipemisiwak Métis Government indicated they would provide additional detail to Teck regarding their interests and concerns in the Project. Teck will continue to work with the Otipemisiwak Métis Government to evaluate impacts of the Project on Otipemisiwak Métis Government's interests.
April 27, 2021	Otipemisiwak Métis Government/Teck Meeting	The Otipemisiwak Métis Government and Teck met to discuss next steps for engagement on the Project.	Teck will work with the Otipemisiwak Métis Government to establish future engagement on the Project as appropriate.
May 27, 2021	Letter from Letter from the Otipemisiwak Métis Government	The Otipemisiwak Métis Government indicated there are possible outstanding concerns with respect to the Project.	Teck will receive a proposal from Otipemisiwak Métis Government for a Traditional Study for the Project.
July 12, 2021	Email to Otipemisiwak Métis Government	Teck advised Otipemisiwak Métis Government their proposal is acceptable.	Teck and Otipemisiwak Métis Government will schedule a meeting to initiate the proposed study.
July 31, 2021	DPD Submission	Teck informed the Otipemisiwak Métis Government that the DPD had been submitted and explained the next steps of the assessment process for the Project.	Teck expressed its commitment to continued engagement with communities and potentially affected Indigenous Peoples as the assessment moves forward in accordance with the requirements for engagement set by the IAAC and BC EAO.
August 31, 2021	Otipemisiwak Métis Government/Teck Meeting	Teck met with the Otipemisiwak Métis Government to discuss the Project, GBA+ and a potential site tour in the fall.	Teck will continue to engage with the Otipemisiwak Métis Government on the Project and will work to advance identified action items.
August 31, 2021	Post-meeting email	Teck emailed the Otipemisiwak Métis Government to follow up on the meeting's action items.	Teck will continue to engage with the Otipemisiwak Métis Government on the Project and will work to advance identified action items.
August 31, 2021	GBA+ Memo	Teck provided the Otipemisiwak Métis Government with the GBA+ memo that outlined GBA+ requirements and approach for the FRX regulatory process.	Teck will work with the Otipemisiwak Métis Government to advance this scope of work per the Otipemisiwak Métis Government's preference.
September 9, 2021	Site Visit Logistics	The Otipemisiwak Métis Government informed Teck that due to COVID-19 cases and added restrictions community members were not able to complete a site visit in the fall.	Teck will defer to the Otipemisiwak Métis Government's preference and current safety restrictions on a site visit due to the COVID-19 pandemic.
September 10, 2021	Site Visit Logistics	Teck responded to the Otipemisiwak Métis Government regarding the scheduling of the site visit for Spring and indicated they could discuss schedules at the next meeting.	Teck will defer to Otipemisiwak Métis Government's preference and current safety restrictions on a site visit due to the COVID-19 pandemic. Teck will discuss this more with the Otipemisiwak Métis Government at a future meeting.
September 20, 2021	Otipemisiwak Métis Government/Teck Meeting	Teck met with the Otipemisiwak Métis Government to discuss COVID-19, the Project, work plan progress and the preliminary report.	Teck will continue to engage with the Otipemisiwak Métis Government throughout the development of the Project.
October 4, 2021	Otipemisiwak Métis Government/Teck Meeting	Teck met with the Otipemisiwak Métis Government to discuss the Project, community updates, work plan updates and timing of the preliminary report.	Teck will continue to engage with the Otipemisiwak Métis Government throughout the development of the Project.
November 15, 2021	Otipemisiwak Métis Government/Teck Meeting	Teck met with the Otipemisiwak Métis Government to discuss COVID-19, the Project, work plan progress and the preliminary report.	Teck will continue to engage with the Otipemisiwak Métis Government throughout the development of the Project.
December 2, 2021	Information Requirements for Effects Assessment letter	Teck provided the Otipemisiwak Métis Government with a letter seeking review and input into several aspects of Teck's assessment of potential effects on Indigenous interests. Teck requested a response by January 7, 2022.	Teck will await feedback from the Otipemisiwak Métis Government on the Information Requirements for Effects Assessment letter.
January 10, 2022	Otipemisiwak Métis Government/Teck Meeting	Teck met with the Otipemisiwak Métis Government to discuss COVID-19, the Otipemisiwak Métis Government election, the Project, work plan progress and the preliminary report.	Teck will continue to engage with the Otipemisiwak Métis Government throughout the development of the Project.
January 14, 2022	Otipemisiwak Métis Government Preliminary Interests Report	The Otipemisiwak Métis Government provided Teck with a Preliminary Interests Report.	Teck appreciates the effort made by Otipemisiwak Métis Government to develop the report. Teck will review and let the Otipemisiwak Métis Government know if there are further questions.
January 24, 2022	Otipemisiwak Métis Government/Teck Meeting	Teck met with the Otipemisiwak Métis Government to discuss timing for a potential site visit and GBA+ scope and timing.	Teck will continue to engage with the Otipemisiwak Métis Government throughout the development of the Project.
March 21, 2022	Otipemisiwak Métis Government/Teck Meeting	Teck met with the Otipemisiwak Métis Government to discuss the Project, work plan progress, GBA+ work and a shift in Otipemisiwak Métis Government's point of contact for engagement.	Teck will continue to engage with the Otipemisiwak Métis Government throughout the development of the Project.
April 5, 2022	Otipemisiwak Métis Government/Teck Meeting	Teck met with the Otipemisiwak Métis Government to discuss timing of the final report.	Teck will work with the Otipemisiwak Métis Government to support information needs for the final report.
April 26, 2022	Otipemisiwak Métis Government/Teck Meeting	Teck met with Otipemisiwak Métis Government to discuss the Project and work plan progress and to do introductions for the new Otipemisiwak Métis Government engagement contact.	Teck will continue to engage with the Otipemisiwak Métis Government throughout the development of the Project.
May 16, 2022	Otipemisiwak Métis Government/Teck Meeting	Teck met with Otipemisiwak Métis Government to discuss the Readiness Decision timing update and work plan progress and to provide an overview of the coordinated assessment for the new Otipemisiwak Métis Government engagement contact.	Teck will continue to engage with the Otipemisiwak Métis Government throughout the development of the Project.

Table 7.9-1: Engagement with Otipemisiwak Métis Government about the Project

Date	Activity	Comments	Approach to addressing
May 30, 2022	Human health Receptor Locations for the Human Health Risk Assessment of the Project	Teck provided the Otipemisiwak Métis Government with the human health receptor locations for the Human Health Risk Assessment of the Project and requested Otipemisiwak Métis Government to review the information and provide feedback to Teck by June 30, 2022.	Teck will continue to engage with the Otipemisiwak Métis Government throughout the development of the Project.
July 11, 2022	Otipemisiwak Métis Government/Teck Meeting	Teck met with the Otipemisiwak Métis Government to discuss the Project and work plan progress and to do introductions for the new Otipemisiwak Métis Government consultant.	Teck will continue to engage with the Otipemisiwak Métis Government throughout the development of the Project.
August 3, 2022	EVWQP Update	Teck provided the Otipemisiwak Métis Government with an update on the EVWQP.	Teck will continue to engage with the Otipemisiwak Métis Government throughout the development of the Project.
August 8, 2022	Otipemisiwak Métis Government/Teck Meeting	Teck met with Otipemisiwak Métis Government to discuss updates on the Readiness Decision and the list of Secondary Sources to be used for the application.	Teck will send the Otipemisiwak Métis Government the existing list of Secondary Sources for review and approval.
August 8, 2022	Secondary Sources	Teck provided a list of secondary sources for review for the FRX assessment.	Teck will continue to engage with the Otipemisiwak Métis Government on the FRX assessment.
October 14, 2022	Secondary Sources	Teck provided the Otipemisiwak Métis Government with an updated list of secondary sources for the Otipemisiwak Métis Government's review and approval of the FRX assessment.	Teck will continue to engage with the Otipemisiwak Métis Government on the FRX assessment.
October 31, 2022	Otipemisiwak Métis Government/Teck Meeting	Teck met with the Otipemisiwak Métis Government to discuss community updates, work plan timing and secondary sources for the Indigenous Interests section of the IS/A.	Teck will continue to engage with the Otipemisiwak Métis Government throughout the development of the Project.
March 20, 2023	Report Response	Teck provided the Otipemisiwak Métis Government with a response to the Final Report for the FRX Project.	Teck will continue to engage with the Otipemisiwak Métis Government throughout the development of the Project.
August 21, 2023	Otipemisiwak Métis Government/Teck Meeting	Teck met with Otipemisiwak Métis Government to discuss Project updates.	Teck will continue to engage with the Otipemisiwak Métis Government throughout the development of the Project.
October 23, 2023	Otipemisiwak Métis Government/Teck Meeting	Teck met with Otipemisiwak Métis Government to discuss Project updates.	Teck will continue to engage with the Otipemisiwak Métis Government throughout the development of the Project.
October 24, 2023	EMC Open House Invitation	Teck invited the Otipemisiwak Métis Government to attend the November 7 EMC Open House.	Teck will continue to engage with the Otipemisiwak Métis Government throughout the development of the Project.
November 20, 2023	Presentation Materials	Teck provided the Otipemisiwak Métis Government with the November 20, 2023, check-in meeting presentation slides and background information regarding the sale of the steelmaking coal business.	Teck will continue to engage with the Otipemisiwak Métis Government throughout the development of the Project.
November 20, 2023	Otipemisiwak Métis Government/Teck Meeting	Teck met with Otipemisiwak Métis Government to discuss Project updates.	Teck will continue to engage with the Otipemisiwak Métis Government throughout the development of the Project.
December 4, 2023	Otipemisiwak Métis Government/Teck Meeting	Teck met with Otipemisiwak Métis Government to discuss updates including the meeting schedule for 2024.	Teck will continue to engage with the Otipemisiwak Métis Government throughout the development of the Project.
December 19, 2023	Year End Appreciation	Teck expressed appreciation to the Otipemisiwak Métis Government for the engagement completed in 2023.	Teck will continue to engage with the Otipemisiwak Métis Government throughout the development of the Project.
January 11, 2024	Otipemisiwak Métis Government/Teck Meeting	Teck held met with Otipemisiwak Métis Government to discuss changes following the 2023 Otipemisiwak Métis Government election.	Teck will continue to engage with Otipemisiwak Métis Government throughout the development of the Project.
January 18, 2024	Existing Conditions Reports	Teck provided Otipemisiwak Métis Government with an update on the existing conditions reports for the assessment of potential effects associated with the Project.	Teck will continue to engage with Otipemisiwak Métis Government on the FRX assessment.
February 8, 2024	Otipemisiwak Métis Government/Teck Meeting	Teck met with Otipemisiwak Métis Government to discuss updates, including community events in 2024 and Teck's plans for 2024 exploration drilling.	Teck will continue to engage with Otipemisiwak Métis Government throughout the development of the Project.
February 28, 2024	Otipemisiwak Métis Government/Teck Meeting	Teck met with Otipemisiwak Métis Government in person to discuss Project updates and community updates.	Teck will continue to engage with Otipemisiwak Métis Government throughout the development of the Project.
April 11, 2024	Otipemisiwak Métis Government/ Teck Meeting	Teck met with Otipemisiwak Métis Government in person to discuss Project updates and community updates.	Teck will continue to engage with Otipemisiwak Métis Government throughout the development of the Project.
May 13, 2024	Otipemisiwak Métis Government/Teck Meeting	Teck met with Otipemisiwak Métis Government to discuss Project and community updates including an inquiry about work Otipemisiwak Métis Government had already completed related to the Project.	Teck provided an email response on May 13, 2024, about the environmental review report provided by Otipemisiwak Métis Government in 2022.
June 13, 2024	Otipemisiwak Métis Government/Teck Meeting	Otipemisiwak Métis Government met with Teck virtually to discuss Project updates and community updates, including the Forward Summit and Otipemisiwak Métis Government's progress on the Traditional Land Use study in Crowsnest Pass Municipality.	Teck will continue to engage with Otipemisiwak Métis Government on the FRX assessment.
June 26, 2024	Site Visit	Teck hosted a site visit with Otipemisiwak Métis Government.	Teck will continue to engage with the Otipemisiwak Métis Government throughout the development of the Project.
July 8, 2024	Report Comments	Teck shared comments with Otipemisiwak Métis Government on the following four reports: FRX Métis Nation of Alberta Gender-Based Analysis (GBA) report, Métis Nation of Alberta Preliminary Report/Environmental Review FRX, Métis Nation of Alberta Final Letter Response and Métis Nation of Alberta Environmental Review.	Teck will continue to engage with Otipemisiwak Métis Government on the FRX assessment.

Table 7.9-1: Engagement with Otipemisiwak Métis Government about the Project

Date	Activity	Comments	Approach to addressing
July 10, 2024	Information Sources	Teck sent an updated list of approved information sources initially provided to Otipemisiwak Métis Government in 2021 and 2022 through email and letter. Teck requested Otipemisiwak Métis Government review the letter and appendix attached in preparation for the FRX DPD submission.	Teck will continue to engage with Otipemisiwak Métis Government on the FRX assessment.
July 11, 2024	Glencore Acquisition	Teck announced to Otipemisiwak Métis Government that the acquisition of EVR by Glencore was approved by the federal government.	Teck will continue to engage with Otipemisiwak Métis Government on the FRX assessment and provide updates on the business.
November 5, 2024	Otipemisiwak Métis Government/EVR Meeting	EVR met with Otipemisiwak Métis Government to discuss Project and community updates.	EVR will continue to engage with the Otipemisiwak Métis Government throughout the development of the Project.
January 23, 2025	Otipemisiwak Métis Government/EVR Meeting	EVR met with Otipemisiwak Métis Government to discuss FRX Project regulatory updates and community and business updates.	EVR will continue to engage with Otipemisiwak Métis Government throughout the development of the Project.
March 20, 2025	Otipemisiwak Métis Government/EVR Meeting	EVR met with Otipemisiwak Métis Government to discuss FRX Project regulatory updates and community updates.	EVR will continue to engage with Otipemisiwak Métis Government throughout the development of the Project.
March 20, 2025	Information Sources Request	EVR emailed Otipemisiwak Métis Government with the proposed Otipemisiwak Métis Government information sources for the FRX Project's Joint Federal and Provincial Impact Statement Application (IS/A) and requested feedback by April 11, 2025.	EVR remains committed to working collaboratively with Otipemisiwak Métis Government throughout the development of the Project.
June 25, 2025	Revised DPD Update	EVR shared the revised DPD submission presentation with Otipemisiwak Métis Government.	EVR remains committed to working collaboratively with Otipemisiwak Métis Government throughout the development of the Project.

Note: In July 2024, Teck Coal Limited (Teck) changed its name to EVR Operations Limited (EVR); refer to Section 1.2.1 for details.

IAAC= Impact Assessment Agency of Canada; BC EAO= British Columbia Environmental Assessment Office; IPD = Initial Project Description; DPD = Detailed Project Description; FRX= Fording River Extension; IS/A= Impact Statement/Application; EMC = Environmental Monitoring Committee; GBA+ = Gender-Based Analysis Plus; EVWQP = Elk Valley Water Quality Plan; EVR= EVR Operations Limited

Based on the Summary of Issues and engagement and report sharing, interests and concerns identified by Otipemisiwak Métis Government include:

- impact to Métis rights, health, culture, tradition and history
- access to lands and resources
- impact to terrestrial and aquatic wildlife habitat, including sensitive ecosystems (e.g., grassland ecosystems)
- emission levels and climate change
- air and water quality
- Métis-led monitoring of water quality for safe drinking water and source water for wildlife and aquatic species
- notification process when artifacts are found during Project-related ground disturbance and protection of archaeological sites
- cumulative effects of development, including agriculture, logging and mining, on the loss of habitat and wildlife, and associated impacts to the availability and suitability of land

Table 7.9-2 provides a list of engagement activities EVR plans to undertake with Otipemisiwak Métis Government.

Table 7.9-2: Planned Engagement with Otipemisiwak Métis Government

Item #	Activity
1	Meet with Otipemisiwak Métis Government to discuss in more detail the interests in the Project and a path forward for continued engagement and mitigating potential effects of the Project.

Teck (now EVR) did not enter into any agreements with Otipemisiwak Métis Government during the Early Engagement Phase of the Project.

7.10 Métis Nation British Columbia

Métis Nation British Columbia forged their political and cultural identity as a distinct group in BC with kinship networks from the Kootenays to the Pacific (Métis Nation British Columbia and Big River Analytics Ltd. 2022). They represent 38 Métis Chartered Communities in BC, including five communities in the Kootenays near the Project area: Columbia Valley located in Invermere, Kootenay South Métis Society located in Trail, West Kootenay Métis Society located in Bonnington, Métis Nation Columbia River Society located in Golden and the Rocky Mountain Métis Society located in Cranbrook. Métis Nation British Columbia does not have specifically defined reserve or settlement areas. The location of the indicated communities in proximity to the Project is presented in Figure 5.1-3.

Métis Citizens of British Columbia have and continue to steward their natural resources and participate in land use activities to meet social, cultural and economic needs (Métis Nation British Columbia 2017). Métis harvesters have reported numerous harvesting sites around the proposed Project area and in the surrounding regions, and frequently harvest elk, moose, deer, black bear, muskrat, beaver, grouse and other small game (Métis Nation British Columbia 2017).

Métis Nation British Columbia is governed by an 11-person cabinet consisting of a President, Vice-President, seven elected Regional Directors and provincially elected representatives for both Métis Women and Métis Youth of British Columbia (Métis Nation British Columbia 2020a).

Teck (now EVR) began engagement with Métis Nation British Columbia in early 2021 and held two introductory meetings in spring 2021 as outlined in Table 7.10-1. EVR acknowledges that Métis Nation British Columbia has existing Indigenous knowledge and traditional land use information that may be relevant for the Project. EVR is committed to engaging on the applicability of any existing studies or information to the Project and requesting permissions from Métis Nation British Columbia for the application of their Indigenous knowledge sources. EVR will continue to engage Métis Nation British Columbia to understand their respective governance, membership, interests and engagement preferences. Table 7.10-1 presents engagement with Métis Nation British Columbia to date.

Table 7.10-1: Engagement with Métis Nation British Columbia about the Project

Date	Activity	Comments	Date
February 16, 2021	Letter to the Métis Nation British Columbia from Teck	Teck provided a letter to introduce the Project and provide an opportunity for future engagement.	Teck will address any follow-up correspondence with further engagement as appropriate.
February 16, 2021	Response to Teck Letter	The Métis Nation British Columbia indicated they would get back to Teck with additional detail regarding the potential impact of the Project on their interests.	Teck will work with the Métis Nation British Columbia to understand and evaluate impacts of the Project on Métis Nation British Columbia's interests.
March 1, 2021	Métis Nation British Columbia Email	The Métis Nation British Columbia emailed Teck to indicate they had an interest in introducing themselves and engaging further.	Teck met with the Métis Nation British Columbia to do introductions and discuss next steps.
March 15, 2021	Métis Nation British Columbia/Teck Meeting	Teck met with the Métis Nation British Columbia to do introductions and discuss future engagement.	Teck will continue to work with the Métis Nation British Columbia to understand their interests in the Project.
May 4, 2021	Métis Nation of British Columbia/Teck Meeting	Teck met with the Métis Nation British Columbia to introduce the Project.	Teck will continue to work with the Métis Nation British Columbia to understand their interests in the Project.
July 31, 2021	DPD Submission	Teck informed the Métis Nation of British Columbia that the DPD had been submitted and outlined the following steps of the assessment process for the Project.	Teck expressed its commitment to continued engagement with communities and potentially affected Indigenous Peoples as the assessment moves forward in accordance with the requirements for engagement set by the IAAC and BC EAO.
September 15, 2021	Métis Nation of British Columbia/Teck Meeting	Teck met with the Métis Nation of British Columbia to discuss coal projects occurring in the Elk Valley, a possible site visit and an overview of the DPD submission.	Teck will continue to engage with the Métis Nation of British Columbia throughout the development of the Project.
November 22, 2021	Métis Nation of British Columbia/Teck Meeting	Teck met with the Métis Nation of British Columbia and discussed the interests report the Métis Nation of British Columbia is working on and next steps in the regulatory process.	Teck will continue to engage with Métis Nation of British Columbia on the FRX assessment.
December 2, 2021	Information Requirements for Effects Assessment letter	Teck provided the Métis Nation of British Columbia with a letter seeking review and input into several aspects of Teck's assessment of potential effects on Indigenous interests. Teck requested a response by January 7, 2022.	Teck will await feedback from the Métis Nation of British Columbia on the Information Requirements for Effects Assessment letter.
February 28, 2022	Métis Nation of British Columbia/Teck Meeting	Teck met with the Métis Nation of British Columbia and discussed the Project, the BC EAO Readiness Decision timeline and other regional topics.	Teck will continue to engage with the Métis Nation of British Columbia throughout the development of the Project.
March 30, 2022	Métis Nation of British Columbia Preliminary Interests Report	The Métis Nation of British Columbia provided Teck with a preliminary interests report regarding their Aboriginal right to harvest in the Project's area.	Teck appreciates the effort the Métis Nation of British Columbia put into developing this report. Teck will review and let the Métis Nation of British Columbia know if there are any questions.
March 30, 2022	Teck Email	Teck responded to the Métis Nation of British Columbia's March 30, 2022, email thanking them for the interests report and requested a name change.	Teck will await the Métis Nation of British Columbia's feedback on the requested name change.
March 30, 2022	Métis Nation of British Columbia Response Email	The Métis Nation of British Columbia responded to Teck's request.	Teck will review the materials and follow up with the Métis Nation of British Columbia if there are any questions.
May 30, 2022	Human Health Proposed Receptor Locations	Teck provided the Métis Nation of British Columbia with the human health proposed receptor locations to be evaluated for the Human Health Risk Assessment of the Project and requested the Métis Nation of British Columbia to review the information and provide feedback to Teck by June 30, 2022.	Teck will continue to engage with the Métis Nation of British Columbia throughout the development of the Project.
June 15, 2022	Métis Nation of British Columbia/Teck Meeting	Teck met with the Métis Nation of British Columbia to discuss the interests report and future in-person engagement.	Teck will continue to engage with the Métis Nation of British Columbia throughout the development of the Project.
August 3, 2022	EVWQP Update	Teck provided the Métis Nation of British Columbia with an update on the EVWQP.	Teck will continue to engage with the Métis Nation of British Columbia throughout the development of the Project.
August 8, 2022	Contact Update	The Métis Nation of British Columbia updated Teck regarding a change in engagement contacts.	Teck will continue to engage with the Métis Nation of British Columbia throughout the development of the Project.
August 9, 2022	Contact Update	Teck acknowledged the Métis Nation of British Columbia's change in engagement contact.	Teck will continue to engage with the Métis Nation of British Columbia throughout the development of the Project.
August 22, 2022	Introduction Meeting	Teck and the Métis Nation of British Columbia held an introduction meeting with the new engagement contact.	Teck will continue to engage with the Métis Nation of British Columbia throughout the development of the Project.
October 14, 2022	Secondary Sources	Teck provided the Métis Nation of British Columbia with an updated list of secondary sources for the Métis Nation of British Columbia's review and approval of the FRX assessment.	Teck will continue to engage with the Métis Nation of British Columbia on the FRX assessment.
October 20, 2022	Secondary Sources	The Métis Nation of British Columbia approved the secondary sources list and requested to review the draft report prior to submission.	Teck will continue to engage with the Métis Nation of British Columbia on the FRX assessment.
January 31, 2023	Report Acknowledgement	Teck provided the Métis Nation of British Columbia with a formal acknowledgement of the Métis Nation of British Columbia Preliminary Response Report that was provided for the FRX Project.	Teck will continue to engage with the Métis Nation of British Columbia on the FRX assessment.
December 19, 2023	Year End Appreciation	Teck expressed appreciation to the Métis Nation of British Columbia for the engagement completed during 2023.	Teck will continue to engage with the Métis Nation of British Columbia throughout the development of the Project.
February 6, 2024	Meeting Request	Teck requested a meeting with Métis Nation of BC to provide an update on the Project and introduce new team members.	Teck will continue to engage with the Métis Nation of BC throughout the development of the Project.
February 20, 2024	Location Inquiry	Métis Nation of BC inquired with Teck regarding their office location.	Teck informed Métis Nation of BC where Teck's office is located and that they would be happy to host them in the future.
February 21, 2024	Métis Nation of BC/Teck Meeting	Métis Nation of BC provided Teck with available options for meeting in March.	Teck confirmed with Métis Nation of BC the date for the check-in meeting and informed them they would send a meeting invitation for March 18, 2024.

Table 7.10-1: Engagement with Métis Nation British Columbia about the Project

Date	Activity	Comments	Date
March 18, 2024	Métis Nation of BC/Teck Meeting	Teck met with Métis Nation of BC to introduce the FRX Project to new Métis Nation of BC staff and provide information on the sale of the steelmaking coal business.	Teck will continue to engage with Métis Nation of BC on the FRX assessment.
March 19, 2024	Meeting Follow-up	Teck provided Métis Nation of BC with the slide deck presentation from the March 18, 2024, meeting.	Teck is committed to sharing timely and accurate information with the Métis Nation of BC.
March 20, 2025	Scheduling Revised DPD Update Meeting	EVR contacted Métis Nation of BC to schedule a meeting to provide an update on the Project and submission of the Revised DPD.	EVR is planning to meet Métis Nation of BC on May 13, 2025.
May 13, 2025	EVR/Métis Nation of British Columbia	EVR met with the Métis Nation of British Columbia to discuss the revised DPD submission.	EVR remains committed to working collaboratively with Métis Nation of British Columbia throughout the development of the Project.

Note: In July 2024, Teck Coal Limited (Teck) changed its name to EVR Operations Limited (EVR); refer to Section 1.2.1 for details.

BC EAO= British Columbia Environmental Assessment Office; DPD = Detailed Project Description; IAAC= Impact Assessment Agency of Canada; FRX= Fording River Extension; EVWQP = Elk Valley Water Quality Plan; EVR= EVR Operations Limited

Based on engagement and report sharing to date, interests and concerns identified by Métis Nation British Columbia include:

- accommodation for potential effects on Métis economic, cultural, social, stewardship, health and well-being
- continued engagement, capacity building and funding, and information sharing
- impacts to rights and traditional land use
- impacts to harvesting, social and ceremony around the Project area
- regional studies to supplement information gaps on traditional land use in the Project area and impacts to asserted rights

Table 7.10-2 provides a list of engagement activities EVR plans to undertake with Métis Nation British Columbia to support the assessment process.

Table 7.10-2: Planned Engagement with Métis Nation British Columbia

Item #	Activity
1	Meet with Métis Nation of British Columbia to discuss in more detail their interests in the Project and a path forward for continued engagement and mitigating potential effects of the Project.

Teck (now EVR) entered into an agreement with Métis Nation British Columbia in February 2022 to facilitate engagement and the collection of data to support the identification of Métis interests related to the Project.

7.11 Elk Valley Métis Nation

Elk Valley Métis Nation represents several hundred Indigenous Peoples in the Elk Valley region of BC who have held historical ties to these lands for generations (Elk Valley Métis Nation 2023). Elk Valley Métis Nation are a distinct group within the broader Métis communities of British Columbia and Canada who continue to reside throughout the Elk Valley and in the nearby communities of Elkford, Sparwood and Fernie (Elk Valley Métis Nation 2021, 2023). The location of the indicated communities in proximity to the Project is presented in Figure 5.1-3.

Traditional activities in the Elk Valley primarily consist of hunting, fishing, harvesting plants, social gatherings, travelling (i.e., mobility), livelihood (e.g., work and employment) and governance. Elk Valley Métis have noted that they have direct land use experience and important Indigenous knowledge in the Project area and continue to rely on these lands and resources for sustenance and the preservation of their culture (Elk Valley Métis Nation 2023).

The Elk Valley Métis Nation exercises its right to self-government and self-determination (Elk Valley Métis Nation 2022). EVR understands Métis of the Elk Valley are represented by the elected leadership of the Elk Valley Métis Association, a provincially registered non-profit society, established in 1994, located in the Kootenay Region in BC. The Elk Valley Métis Association is a member of the National Métis Nation Council.

Teck (now EVR) began engagement with Elk Valley Métis Nation in early 2021 and held an introductory meeting in spring 2021 as outlined in Table 7.11-1. EVR acknowledges that Elk Valley Métis have existing Indigenous knowledge and traditional land use information that may be relevant for the Project. EVR is committed to engaging on the applicability of any existing studies or information to the Project and requesting permissions from Elk Valley Métis for the application of their Indigenous knowledge sources. EVR will continue to engage Elk Valley Métis Nation to understand their respective governance, membership, interests and engagement preferences. Table 7.11-1 presents engagement with Métis Nation British Columbia to date.

Table 7.11-1: Engagement with Elk Valley Métis about the Project

Date	Activity	Comments	Approach to addressing
February 25, 2021	Letter to Teck	Elk Valley Métis Nation provided a letter to Teck outlining their interest in engaging on the Project.	Teck responded to the letter with an email response offering an introductory call. Teck will work to understand Elk Valley Métis Nation's interests in the Project.
March 2, 2021	Elk Valley Métis Nation/Teck Introductory Meeting	Teck met with the Elk Valley Métis Nation to do introductions and discuss future engagement.	Teck will work with the Elk Valley Métis Nation to evaluate impacts of the Project on the Elk Valley Métis Nation's interests.
March 23, 2021	Elk Valley Métis Nation/Teck Meeting	Teck met with the Elk Valley Métis Nation to provide further information on the Project, and for the Elk Valley Métis Nation to provide a presentation on their history.	Teck will continue to work with the Elk Valley Métis Nation to understand their interests in the Project.
May 18, 2021	Elk Valley Métis Nation/Teck Meeting	Teck met with the Elk Valley Métis Nation to provide an overview of steelmaking coal and for the Elk Valley Métis Nation to provide a presentation on their consultation process.	Teck will continue to work with the Elk Valley Métis Nation to understand their interests in the Project.
June 1, 2021	Elk Valley Métis Nation/Teck Meeting	Teck met with the Elk Valley Métis Nation to discuss a future site visit to better understand the Project area.	Teck will work with the Elk Valley Métis Nation to facilitate a site visit.
June 29, 2021	Elk Valley Métis Nation Site Tour	Teck provided a tour of FRO and the Project area.	Teck will continue to work with the Elk Valley Métis Nation to understand and evaluate impacts of the Project on the Elk Valley Métis Nation's interests.
July 31, 2021	DPD submission	Teck informed the Elk Valley Métis Nation via email that the DPD had been submitted and outlined the next steps of the assessment process for the Project.	Teck expressed its commitment to continued engagement with communities and potentially affected Indigenous Peoples throughout the development of the Project.
September 15, 2021	Email Update	Teck followed up with the Elk Valley Métis Nation via email on anticipated fieldwork and terminology.	Teck will proceed to use the preferred terminology as requested by the Elk Valley Métis Nation.
March 9, 2022	Information Requirements for Effects Assessment Letter	Teck provided the Elk Valley Métis Nation with a letter seeking review and input into several aspects of Teck's assessment of potential effects on Indigenous interests. Teck requested a response by March 31, 2022.	Teck will await feedback from the Elk Valley Métis Nation on the Information Requirements for Effects Assessment letter.
March 23, 2022	Elk Valley Métis Nation/Teck Meeting	Teck met with the Elk Valley Métis Nation to discuss Project updates and the development of a work plan.	Teck requested the Elk Valley Métis Nation put together a work plan outlining their approach to gathering information related to their interests assessment for the Project.
April 1, 2022	Elk Valley Métis Nation response to Information Requirements for Effects Assessment letter	The Elk Valley Métis Nation provided Teck with a response to the Information Requirements for Effects Assessment letter dated March 9, 2022.	Teck acknowledges the Elk Valley Métis Nation's feedback and will continue to work with the Elk Valley Métis Nation on the Project. Teck will discuss the response with the Elk Valley Métis Nation in the next meeting.
April 6, 2022	Elk Valley Métis Nation/Teck Meeting	Teck met with the Elk Valley Métis Nation in person to discuss the Information Requirements for Effects Assessment letter, a forthcoming work plan and alignment on the Elk Valley Métis Nation's preferred way of providing feedback into the assessment.	Teck will await the Elk Valley Métis Nation's work plan and will meet with the Elk Valley Métis Nation to discuss next steps.
May 30, 2022	Human Health Receptor Locations for the Human Health Risk Assessment of the Project	Teck provided the Elk Valley Métis Nation with the human health receptor locations for the Human Health Risk Assessment of the Project and requested the Elk Valley Métis Nation review the information and provide feedback to Teck by June 30, 2022.	Teck will continue to engage with the Elk Valley Métis Nation throughout the development of the Project.
June 1, 2022	Elk Valley Métis Nation response on the Human Health Receptor Locations	The Elk Valley Métis Nation responded to Teck via email to indicate they would provide feedback on the human health receptor locations.	Teck will await feedback from the Elk Valley Métis Nation on the human health receptor locations.
June 1, 2022	Elk Valley Métis Nation Letter to Teck	The Elk Valley Métis Nation provided Teck with an updated response to the Information Requirements for Effects Assessment letter and a draft work plan for developing their Indigenous interest information.	Teck will review the information and respond to the Elk Valley Métis Nation.
June 6, 2022	Elk Valley Métis Nation/Teck Meeting	Teck met with the Elk Valley Métis Nation to discuss membership, work plan progress and the Project schedule.	Teck will continue to engage with the Elk Valley Métis Nation throughout the development of the Project.
June 22, 2022	Human Health Risk Assessment Map	The Elk Valley Métis Nation provided Teck with feedback related to the human health receptor locations.	Teck will review the feedback provided by the Elk Valley Métis Nation.
August 3, 2022	Update on the EVWQP	Teck provided the Elk Valley Métis Nation with an update on the EVWQP.	Teck will continue to engage with the Elk Valley Métis Nation throughout the development of the Project.
October 4, 2022	Elk Valley Métis Nation/Teck Meeting	Teck met with the Elk Valley Métis Nation to discuss the report timing and future meetings.	Teck will continue to engage with the Elk Valley Métis Nation throughout the development of the Project.
October 14, 2022	FRX Assessment Secondary Sources List	Teck provided the Elk Valley Métis Nation with an updated list of secondary sources to be used in the FRX assessment for the Elk Valley Métis Nation's review and approval.	Teck will follow up with the Elk Valley Métis Nation on the approval of the secondary sources list.
November 30, 2022	Elk Valley Métis Nation/Teck Meeting	Teck met with the Elk Valley Métis Nation to discuss the Human Health assessment approach and topics of interest for future meetings.	Teck will continue to engage with the Elk Valley Métis Nation throughout the development of the Project.
April 4, 2023	Elk Valley Métis Nation/Teck Meeting	Teck met with the Elk Valley Métis Nation to discuss company separation news and next steps for the Elk Valley Métis Nation's Report.	Teck will continue to engage with the Elk Valley Métis Nation throughout the development of the Project.
May 5, 2023	Cultural Impact Assessment	The Elk Valley Métis Nation provided Teck with a draft outline of their Cultural Impact Assessment Report.	Teck will continue to engage with the Elk Valley Métis Nation on this item.
May 30, 2023	Elk Valley Métis Nation/Teck Meeting	Teck met with the Elk Valley Métis Nation to discuss the regulatory timeline and a future reclamation tour.	Teck will continue to engage with the Elk Valley Métis Nation throughout the development of the Project.
June 27, 2023	Elk Valley Métis Nation Site Visit	Teck hosted a site tour for the Elk Valley Métis Nation at Greenhills Operations focused on reclamation progress.	Teck will continue to engage with the Elk Valley Métis Nation throughout the development of the Project.
August 15, 2023	Elk Valley Métis Nation/Teck Meeting	Teck met with the Elk Valley Métis Nation to discuss progress on the work plan and report, and to provide an update on their housing study.	Teck will continue to engage with the Elk Valley Métis Nation throughout the development of the Project.
October 24, 2023	EMC Open House Invitation	Teck invited the Elk Valley Métis Nation to attend the November 7, 2023, EMC Open House.	Teck will continue to engage with the Elk Valley Métis Nation throughout the development of the Project.
October 31, 2023	Annual Water Quality Open House	Teck invited the Elk Valley Métis Nation to attend their Annual Water Quality Open House on November 15, 2023.	Teck will continue to engage with the Elk Valley Métis Nation throughout the development of the Project.

Table 7.11-1: Engagement with Elk Valley Métis about the Project

Date	Activity	Comments	Approach to addressing
November 20, 2023	Sale News	Teck proposed an end-of-year catch-up meeting and provided the official news release regarding the sale of the steelmaking coal business.	Teck will continue to engage with the Elk Valley Métis Nation throughout the development of the Project and provide updates on the business.
November 20, 2023	SharePoint Access	The Elk Valley Métis Nation requested access to the SharePoint site with the Existing Conditions Reports.	Teck will provide access to the SharePoint site.
November 30, 2023	SharePoint Access	Teck provided the Elk Valley Métis Nation with access to the SharePoint site with the Existing Conditions Reports.	Teck will continue to provide access to the SharePoint site.
December 13, 2023	Elk Valley Métis Nation/Teck Meeting	Teck met with the Elk Valley Métis Nation to discuss Project updates and the use of road systems for access for traditional use.	Teck has added the Elk Valley Métis Nation to their list of engagement contacts for annual road rehabilitation engagement.
December 19, 2023	Year End Appreciation	Teck expressed appreciation to the Elk Valley Métis Nation for the engagement completed in 2023.	Teck will continue to engage with the Elk Valley Métis Nation throughout the development of the Project.
January 2, 2024	Existing Conditions Reports	Teck informed the Elk Valley Métis Nation that new existing conditions reports were added to the SharePoint site.	Teck will continue to engage with the Elk Valley Métis Nation throughout the development of the Project.
January 15, 2024	Elk Valley Métis Nation/Teck Meeting	Teck met with the Elk Valley Métis Nation to discuss community priorities.	Teck will continue to engage with the Elk Valley Métis Nation throughout the development of the Project.
January 25, 2024	Biodiversity Conference	Teck thanked the Elk Valley Métis Nation for their check-in meeting and inquired about the biodiversity conference that was mentioned.	Teck will continue to engage with the Elk Valley Métis Nation throughout the development of the Project.
January 29, 2024	Existing Conditions Reports	The Elk Valley Métis Nation informed Teck they were having issues accessing the SharePoint to review the existing conditions reports and requested another access link.	Teck granted the Elk Valley Métis Nation access to the files.
January 29, 2024	Existing Conditions Reports	Teck informed the Elk Valley Métis Nation that they provided an additional access link to the SharePoint folder and confirmed they would like to be part of the biodiversity conference in April.	Teck granted the Elk Valley Métis Nation access to the files.
March 4, 2024	New Existing Conditions Reports	Teck provided Elk Valley Métis Nation that new existing conditions reports had been added to the SharePoint site.	Teck will continue to engage with Elk Valley Métis Nation on the FRX assessment.
March 11, 2024	Biodiversity Conference	Teck proposed to have a meeting with Elk Valley Métis Nation in preparation for the biodiversity conference in April.	Teck will continue to engage with the Elk Valley Métis Nation throughout the development of the Project.
April 23, 2024	Biodiversity Conference	Teck attended the Elk Valley Métis Biodiversity Conference in Fernie including presenting on Teck's approach to biodiversity management in the Elk Valley.	Teck will continue to engage with Elk Valley Métis Nation throughout the development of the Project.
April 26, 2024	Site Visit	Teck provided Elk Valley Métis Nation with potential dates for a site visit in July or August.	Teck remains committed to supporting logistics for engagement with Elk Valley Métis Nation.
May 9, 2024	Biodiversity Conference Follow-Up	Teck responded to Elk Valley Métis Nation's May 8, 2024, email regarding potential dates for an in-person meeting.	Teck scheduled a meeting on May 24, 2024 (see below).
May 24, 2024	Elk Valley Métis Nation/Teck Meeting	Teck met with Elk Valley Métis Nation to discuss community priorities and a funding agreement.	Teck committed in providing Elk Valley Métis Nation with a draft funding agreement.
June 5, 2024	Reclamation Tour	Elk Valley Métis Nation asked Teck if a group of citizens could do a one-day reclamation tour during the week of July 3–5.	On June 5, 2024, Teck provided a potential date for Elk Valley Métis citizens to do a one-day reclamation tour and requested Elk Valley Métis provide a total number of people who would participate.
June 17, 2024	Elk Valley Métis Nation Agenda for Community Meeting	Elk Valley Métis Nation provided Teck with an invite and agenda for a community meeting on June 19, 2024.	Teck responded to Elk Valley Métis Nation on June 18, 2024, informing Elk Valley Métis Nation that they would not be able to attend and requested Project updates to be shared with the group.
June 27, 2024	Reclamation Tour	Elk Valley Métis Nation provided a list of participants to Teck for the July 2024 reclamation tour.	Teck responded to Elk Valley Métis and shared a draft agenda.
July 3, 2024	Funding (Relationship) Agreement	Elk Valley Métis Nation requested an update from Teck on the funding (relationship) agreement.	Teck will continue to engage with Elk Valley Métis Nation on the Project and will work to advance identified action items.
July 4, 2024	Reclamation Tour	Teck hosted a reclamation tour at LCO for Elk Valley Métis Nation	Teck will continue to engage with Elk Valley Métis Nation on the Project and will work to advance identified action items following the tour.
July 6, 2024	Glencore Acquisition	Teck announced to Elk Valley Métis Nation that the acquisition of EVR by Glencore was approved by the federal government.	Teck will continue to engage with the Elk Valley Métis Nation throughout the development of the Project and provide updates on the business.
August 9, 2024	Capacity Support	EVR emailed Elk Valley Métis Nation confirming they would provide capacity support for engagement.	EVR will continue to engage with the Elk Valley Métis Nation throughout the development of the Project.
September 10, 2024	Funding Agreement Review	EVR emailed Elk Valley Métis Nation an updated funding agreement for their review.	EVR will continue to engage with the Elk Valley Métis Nation throughout the development of the Project.
October 2, 2024	Archaeology And Water Quality Reports	EVR shared archaeology and water quality reports with Elk Valley Métis Nation, offering access to additional reports and an invitation to discuss.	EVR will continue to engage with the Elk Valley Métis Nation on these reports.
October 10, 2024	Elk Valley Métis Nation/EVR Meeting	EVR met with Elk Valley Métis Nation to provide an FRX Project regulatory update, discuss next steps for formalizing a funding agreement, and to get insight on Elk Valley Métis Nation's intended separation from the Métis Nation of British Columbia.	EVR will continue to engage with the Elk Valley Métis Nation throughout the development of the Project.
October 22, 2024	Fish And Fish Habitat Report	EVR shared with Elk Valley Métis Nation the Existing Conditions Fish and Fish Habitat for their access and review.	EVR will continue to engage with the Elk Valley Métis Nation throughout the development of the Project.
November 20, 2024	Invitation on Water Quality Open House	EVR emailed Elk Valley Métis Nation an update on the annual Water Quality Open House scheduled for November 26, 2024, and extended an invitation to the event.	EVR is committed to sharing timely and accurate information with Elk Valley Métis Nation.
February 11, 2025	Elk Valley Métis Nation/EVR Meeting	EVR met with Elk Valley Métis Nation to discuss FRX Project regulatory updates and community and business updates.	EVR will continue to engage with Ek Valley Métis Nation throughout the development of the Project.

Table 7.11-1: Engagement with Elk Valley Métis about the Project

Date	Activity	Comments	Approach to addressing
April 10, 2025	Elk Valley Métis Nation/EVR Meeting	EVR met with Elk Valley Métis Nation to discuss FRX Project regulatory updates and community and business updates.	EVR will continue to engage with Ek Valley Métis Nation throughout the development of the Project.
April 22-23, 2025	Elk Valley Métis Biodiversity Conference	EVR attended the annual Elk Valley Métis Conference in Fernie.	EVR will continue to engage with Ek Valley Métis Nation throughout the development of the Project.
May 20, 2025	EVR/Elk Valley Métis Nation Meeting	EVR met with Elk Valley Métis Nation to discuss changes to the Revised Detailed Project Description.	EVR remains committed to working collaboratively with Elk Valley Métis Nation throughout the development of the Project.

Note: In July 2024, Teck Coal Limited (Teck) changed its name to EVR Operations Limited (EVR); refer to Section 1.2.1 for details.
FRO= Fording River Operations; DPD = Detailed Project Description; EMC = Environmental Monitoring Committee; EVWQP = Elk Valley Water Quality Plan; LCO = Line Creek Operations; EVR= EVR Operations Limited

Based on engagement and report sharing to date, interests and concerns identified by the Elk Valley Métis Nation include:

- potential effects and cumulative effects on the ability to pursue traditional land use, including:
  - direct and indirect loss of land
  - changes in access
  - changes in water quality and aquatic species health
  - changes in animal abundance and health
  - increased pollution and sensory disturbance
  - increased population, recreational and conservation efforts
  - increased participation in the wage economy
- development of regional land use studies and programs for monitoring, culture and employment training

Table 7.11-2 provides a list of engagement activities EVR plans to undertake with the Elk Valley Métis Nation.

Table 7.11-2: Planned Engagement with Elk Valley Métis Nation

Item #	Activity
1	Meet with Elk Valley Métis Nation regularly to discuss in more detail their interests in the Project and mitigation of potential effects of the Project.

Teck (now EVR) entered into an agreement with the Elk Valley Métis Nation in 2022 to facilitate engagement and the collection of data to support the identification of the Elk Valley Métis interests related to the Project.

8.0 Potentially Affected Public, Government Agencies, Non-Government Organizations and Technical Advisors

Early and meaningful engagement with persons who may be affected by or have an interest in the Project is important to EVR and is an integral component of the process under the IAA and the BC EAA. EVR (formerly Teck) has been engaging on the Project with multiple organizations and groups since 2018. This section summarizes engagement with the public, government agencies, non-government organizations and technical advisors. A summary of engagement directly with potentially affected Indigenous Peoples regarding the Project is presented in Section 7.0.

The Project has completed engagement through a variety of methods, including in-person meetings, teleconferences, letters, emails and via the Project website (https://www.glencore.ca/en/evr/fording-river-extension). The website is designed to support engagement in a virtual space, provide an additional opportunity to collect feedback and serve as a mechanism for interested parties to stay connected to the Project.

The following interested parties have been engaged with on the Project to date:

- technical advisors invited to comment on the Project by the IAAC and the BC EAO, including identified government agencies and potentially affected Indigenous Peoples
- landowners, residents and businesses in the vicinity of the Project
- environmental groups
- community-based organizations
- local governments
- employees and union groups
- interested members of the public
- potentially affected Indigenous Peoples (refer to Section 7.0)

Engagement activities undertaken since the development of the provincial IPD (i.e., July 2020 to June 2024) are summarized in Table 8-1. For a summary of engagement activities prior to this update (i.e., January 2018 to March 2020), refer to Tables 14 through 16 of the provincial Engagement Plan.

Table 8-1: Engagement with Potentially Affected Public, Government Agencies, Non-Governmental Organizations and Technical Advisors about the Project since Preparation of the Provincial Initial Project Description

Date	Group(s) Engaged	Purpose of Engagement
July 15, 2020	Confederated Salish & Kootenai Tribes	Feedback provided on provincial IPD via a letter to the BC EAO.
July 31, 2020	Ktunaxa Nation, Shuswap Band, Stoney Nakoda Nations, Piikani Nation, Siksika Nation, Kainai (Blood Tribe), Confederated Salish & Kootenai Tribes, Kootenai Tribe of Idaho, City of Fernie, District of Elkford, BC IHA, ECCC, Health Canada, Ministry of Energy, Mines and Petroleum Resources, BC MECCS, BC FLNRORD, US EPA	Feedback provided on the provincial IPD via the Summary of Engagement and comment tracking database.
August 13, 2020	Backcountry Hunters and Anglers (BC and Montana chapters)	Backcountry Hunters and Anglers (BC and Montana chapters) letter providing feedback on the Project received by Teck.
August 21, 2020	Confederated Salish & Kootenai Tribes	Teck reached out to the Confederated Salish & Kootenai Tribes following the federal decision to open engagement.
August 21, 2020	Confederated Salish & Kootenai Tribes	The Confederated Salish & Kootenai Tribes responded to Teck's email indicating interest in further engagement on the Project.
August 26, 2020	District of Elkford	Meeting with the District of Elkford to discuss IPD feedback. Teck provided some clarity on the District of Elkford comments and the District of Elkford highlighted some Project interests.
September 8, 2020	EKWA	Teck letter response to EKWA.
September 8, 2020	Elkford Rod and Gun Club	Teck letter response to Elkford Rod and Gun Club.
September 9, 2020	Backcountry Hunters and Anglers (BC and Montana chapters)	Teck letter response to Backcountry Hunters and Anglers (BC and Montana chapters).
October 30, 2020	Confederated Salish & Kootenai Tribe	Provided feedback on the federal IPD via a letter to the IAAC.
November 3, 2020	US EPA	Provided feedback on the federal IPD via a letter to the IAAC.
November 17, 2020	District of Sparwood	Teck provided an update on the Project and DPD.
November 18, 2020	Backcountry Hunters and Anglers (BC and Montana chapters)	Teck provided an update on the Project and DPD; discussion of interests on the Project.
November 23, 2020	District of Elkford	Teck provided an update on the Project and DPD.
December 1, 2020	Municipality of the Crowsnest Pass	Teck provided an update on the Project and DPD.
December 4, 2020	Regional District of East Kootenay	Teck provided an update on the Project and DPD.
December 8, 2020	Elk Valley Bighorn Outfitters	Teck provided an update on the Project and DPD; identified interests in the Project.
December 9, 2020	EKWA, Elkford Rod and Gun Club, Sparwood District Fish and Wildlife Association	Teck provided an update on the Project and DPD.
December 16, 2020	Outdoor Recreationalists	Teck presented at the Outdoor Recreationalists annual meeting; provided an update on the Project and DPD.
December 18, 2020	Confederated Salish & Kootenai Tribes	Provided feedback on the DPD via a letter to the IAAC and BC EAO.
December 30, 2020	Backcountry Hunters & Anglers (BC and Montana Chapters)	Provided a letter to Teck further outlining interests and suggestions for mitigations.
February 1, 2021	Backcountry Hunters & Anglers (BC and Montana Chapters)	Teck letter response to Backcountry Hunters and Anglers (BC and Montana chapters).
February 17, 2021	Backcountry Hunters & Anglers (BC and Montana chapters)	Meeting to discuss terrestrial components of the letter provided by Backcountry Hunters and Anglers (BC and Montana chapters) on December 30, 2020.
March 15, 2021	Local Trapper	Phone call with local trapper to discuss the Project and potential impacts and interests.
March 16, 2021	District of Elkford	Meeting to continue discussion of interests on the Project.
April 8, 2021	Contractor Townhall	Teck provided a Project presentation to current and potential new contractors in the region.
April 12, 2021	District of Elkford	Meeting to continue discussion of Project interests, specifically the District of Elkford housing study.
April 21, 2021	District of Sparwood, Social Community and Economic Effects Advisory Committee	Teck provided a Project update presentation to this committee, formed as a condition of the Baldy Ridge Extension Environmental Assessment Certificate.
April 29, 2021	Backcountry Hunters and Anglers (BC and Montana chapters)	Meeting to discuss aquatic topics in the letter provided by Backcountry Hunters and Anglers (BC and Montana chapters) on December 30, 2020.
May 26, 2021	District of Sparwood	The District of Sparwood participated in a data collection interview focused on socio-economic topics.
May 26, 2021	Elk Valley Safe Homes	Elk Valley Safe Homes participated in a data collection interview focused on socio-economic topics.
May 27, 2021	Causeway Bay Hotel	Causeway Bay Hotel participated in a data collection interview focused on socio-economic topics.
May 27, 2021	District of Elkford Chief Administrative Officer	The Chief Administrative Officer for the District of Elkford participated in a data collection interview focused on socio-economic topics.
June 1, 2021	RE/MAX	RE/MAX participated in a data collection interview focused on socio-economic topics.
June 1, 2021	District of Elkford	The District of Elkford participated in a data collection interview focused on socio-economic topics.
June 1, 2021	Fire/Emergency Services Fernie	Fire/Emergency Services Fernie participated in a data collection interview focused on socio-economic topics.
June 2, 2021	Fernie Chamber of Commerce	The Fernie Chamber of Commerce participated in a data collection interview focused on socio-economic topics.
June 2, 2021	District of Sparwood Chief Administrative Officer	The Chief Administrative Officer for the District of Sparwood participated in a data collection interview focused on socio-economic topics.
June 2, 2021	Fernie Senior Citizens Society	The Fernie Senior Citizens Society participated in a data collection interview focused on socio-economic topics.
June 3, 2021	Teck employees	A group of Teck employees participated in a data collection interview focused on socio-economic topics.
June 3, 2021	Local trapper	A trapper located within proximity to the Project participated in a data collection interview focused on land use topics.

Table 8-1: Engagement with Potentially Affected Public, Government Agencies, Non-Governmental Organizations and Technical Advisors about the Project since Preparation of the Provincial Initial Project Description

Date	Group(s) Engaged	Purpose of Engagement
June 4, 2021	Elk Valley Bighorn Outfitters	The Elk Valley Bighorn Outfitters participated in a data collection interview focused on land use topics.
June 8, 2021	Elkford Chamber of Commerce	The Elkford Chamber of Commerce participated in a data collection interview focused on socio-economic topics.
June 9, 2021	Fernie Women's Resource Centre	The Fernie Women's Resource Centre participated in a data collection interview focused on socio-economic topics.
June 10, 2021	Royal LePage	Royal LePage participated in a data collection interview focused on socio-economic topics.
June 10, 2021	Elkford Rod and Gun Club	The Elkford Rod and Gun Club participated in a data collection interview focused on land use topics.
June 15, 2021	Backcountry Hunters and Anglers (BC and Montana chapters)	The Backcountry Hunters and Anglers (BC and Montana chapters) participated in a data collection interview focused on land use topics.
June 16, 2021	East Kootenay Addiction Services	The East Kootenay Addiction Services participated in a data collection interview focused on socio-economic topics.
June 17, 2021	Regional District of East Kootenay	The Regional District of East Kootenay participated in a data collection interview focused on socio-economic topics.
June 18, 2021	Crowsnest Pass Chief Administrative Officer	The Chief Administrative Officer for the Municipality of the Crowsnest Pass participated in a data collection interview focused on socio-economic topics.
June 22, 2021	Elkford ATV Club	The Elkford ATV Club participated in a data collection interview focused on land use topics.
June 22, 2021	Sparwood Chamber of Commerce	The Sparwood Chamber of Commerce participated in a data collection interview focused on socio-economic topics.
June 22, 2021	Elk Valley Family Society	The Elk Valley Family Society participated in a data collection interview focused on socio-economic topics.
June 23, 2021	Fernie Pride Society	The Fernie Pride Society participated in a data collection interview focused on socio-economic topics.
June 23, 2021	City of Fernie Chief Administrative Officer	The Chief Administrative Officer for the City of Fernie participated in a data collection interview focused on socio-economic topics.
June 24, 2021	Sparwood Senior Citizens Housing Society	The Sparwood Senior Citizens Housing Society participated in a data collection interview focused on socio-economic topics.
June 25, 2021	Teck Human Resources	Teck Human Resources representatives participated in a data collection interview focused on socio-economic topics.
June 29, 2021	School District 5	Representatives from School District 5 participated in a data collection interview focused on socio-economic topics.
July 7, 2021	SDFWA	The SDFWA re-submitted a letter provided to Teck in May 2020 to indicate that their interest topics remain the same.
July 7, 2021	SDFWA	Teck responded to the SDFWA regarding their Project concerns letter from July 7, 2021.
July 8, 2021	SDFWA	The SDFWA thanked Teck for their response on Project concerns and informed Teck that additional feedback would be provided.
July 15, 2021	BC IHA	The BC IHA participated in a data collection interview focused on socio-economic topics.
July 21, 2021	SDFWA	Teck responded to SDFWA by re-sending the letter from May 19, 2021, which addressed SDFWA's concerns about suitable mitigation measures for the Project. This letter was originally a response to SDFWA's letter of concern, which was submitted during the opening of the public comment period in 2020. Teck also requested a meeting in September 2021 to discuss any further questions.
July 26, 2021	SDFWA	The SDFWA responded to Teck's request for a meeting in September 2021 to discuss Project updates.
July 29, 2021	BC EAO, BC MECCS, BC EMLI, City of Fernie, DFO, District of Elkford, District of Sparwood, ECCC, First Nations Health Authority, Global Affairs Canada, Health Canada, IAAC, Industry Canada, BC IHA, FLNRORD, Montana Department of Environmental Quality, Natural Resources Canada, Women and Gender Equality Canada, US EPA	The BC EAO sent out meeting invitation for the Technical Advisors Committee meeting on August 11, 2021.
July 29, 2021	EKWA	Teck informed the EKWA that the DPD had been submitted and explained the next steps in the assessment process for the Project.
July 29, 2021	SDFWA	Teck informed the SDFWA that the DPD had been submitted and explained the next steps of the assessment process for the Project.
July 29, 2021	Elkford Rod and Gun Club	Teck informed Elkford Rod and Gun Club that the DPD had been submitted and explained the next steps of the assessment process for the Project.
July 29, 2021	Fernie Rod and Gun Club	Teck informed Fernie Rod and Gun Club that the DPD had been submitted and explained the next steps of the assessment process for the Project.
July 29, 2021	Backcountry Hunters and Anglers (BC chapter)	Teck informed the Backcountry Hunters and Anglers (BC chapter) that the DPD had been submitted and explained the next steps of the assessment process for the Project.
July 29, 2021	Elkford Chamber of Commerce	Teck informed the Elkford Chamber of Commerce that the DPD had been submitted and explained the next steps of the assessment process for the Project.
July 29, 2021	BC EMLI	Teck submitted the 2021 Grassland Reclamation Plan and updated the MYAB annual form to support approval of five drill pads and roads in grasslands.
July 31, 2021	EKWA	The EKWA sent Teck a thank you email regarding the submission of the DPD.
August 3, 2021	SDFWA	Teck requested a meeting with the SDFWA prior to September 2021 to provide an update on Teck's progress on net positive impact (NPI).
August 5, 2021	SDFWA	The SDFWA sent Teck an appreciation email regarding Teck's update on the submission of the DPD.
August 10, 2021	IAAC, BC EAO	Teck met with the IAAC and the BC EAO in preparation for the Technical Advisory Committee meeting.
August 11, 2021	SDFWA	Teck followed up with the SDFWA regarding the potential to have a meeting before September 2021 due to hunting season and personnel availability.

Table 8-1: Engagement with Potentially Affected Public, Government Agencies, Non-Governmental Organizations and Technical Advisors about the Project since Preparation of the Provincial Initial Project Description

Date	Group(s) Engaged	Purpose of Engagement
August 11, 2021	BC EAO; BC MECCS; BC EMLI; City of Fernie; Confederated Salish & Kootenai Tribes; DFO; District of Elkford; District of Sparwood; ECCC; First Nations Health Authority; Global Affairs Canada; Health Canada; IAAC; Industry Canada; BC IHA; Kootenai Tribes of Idaho; FLNRORD; Montana Department of Environmental Quality; Natural Resources Canada; Women and Gender Equality Canada; US EPA	The IAAC and BC EAO held a Technical Advisors Committee meeting for the Readiness Decision Phase. Following the meeting, the BC EAO sent out a copy of the presentation materials.
August 17, 2021	IAAC, BC EAO	Teck met with the IAAC and BC EAO to discuss the August 11 Technical Advisory Committee meeting and process towards the provincial Readiness Decision.
August 23, 2021	SDFWA	Teck followed up with the SDFWA on the meeting request to discuss Project progress on NPIs.
August 31, 2021	SDFWA	Teck followed up with the SDFWA on the meeting request to discuss the Project progress on NPIs.
August 31, 2021	SDFWA	The SDFWA sent a response to Teck regarding the meeting request on NPIs.
August 31, 2021	SDFWA	Teck confirmed the SDFWA-requested time for the meeting on NPIs.
August 31, 2021	IAAC, BC EAO	Teck met with the IAAC and BC EAO to discuss public comment period timing for Process Planning/Notice of Commencement, Technical Advisory Committee reviews of the DPD and Indigenous Engagement.
September 7, 2021	SDFWA	The SDFWA responded to Teck's follow-up meeting request.
September 7, 2021	BC EMLI	Teck received BC EMLI approval on the 2021 Grassland Reclamation Plan and updated the MYAB annual form. The reclamation bond was updated to include the additional sites.
September 8, 2021	BC EAO	Teck received a copy of the letter sent by the BC EAO to KNC regarding KNC's request to pause all environmental assessments in the Elk Valley.
September 10, 2021	BC EMLI	Teck received a letter from BC EMLI, on behalf of KNC, in response to the 2021 Grassland Reclamation Plan.
September 15, 2021	Ktunaxa Nation; FLNRORD; BC EMLI	Teck held a meeting with KNC, Yaq̓it ʔa·knuqƛi 'it, FLNRORD and BC EMLI on the recent authorization for exploration activities.
September 22, 2021	IAAC, BC EAO	Teck met with the IAAC and BC EAO to discuss an IAAC update on review of TISG/AIR, a BC EAO update on Indigenous engagement and a Teck update on tour with US EPA.
September 27, 2021	District of Sparwood	Teck met with the District of Sparwood to discuss the Project overview and DPD comments.
September 27, 2021	District of Sparwood	The District of Sparwood provided Teck with information on the market housing study following the September 27, 2021, meeting.
October 12, 2021	SDFWA	Teck met with the SDFWA to discuss NPIs of the Project.
October 27, 2021	IAAC, BC EAO, ECCC	The BC EAO provided Teck, the IAAC and ECCC a slide deck for the meeting on December 7, 2021.
November 22, 2021	BC EMLI	Initial engagement with BC EMLI on options for exploration permitting options beyond 2023; briefly discussed the 2022 work plan.
December 1, 2021	BC EAO	Teck provided a letter to the BC EAO regarding the business impacts of continued delays to the Readiness Decision. Teck copied KNC on this letter.
December 7, 2021	IAAC, BC EAO, ECCC, FLNRORD	Teck met with the IAAC, BC EAO, ECCC and FLNRORD to discuss terrestrial existing conditions data.
January 10, 2022	BC EMLI	Teck met with BC EMLI to discuss the work plan for 2022 in more detail, including proposed planned departure and grassland work.
February 10, 2022	BC EMLI, FLNRORD	Teck met with BC EMLI and FLNRORD to discuss adjusted location for a road and drill pad previously overlapping small grasslands polygon.
February 16, 2022	BC EAO	Teck provided a letter to the BC EAO requesting clarity on the process to achieve consensus. KNC was copied on the letter.
March 1, 2022	BC EMLI, Ktunaxa Nation	Teck hosted the MYAB Annual Update meeting with BC EMLI, KNC and Yaq̓it ʔa·knuqƛi 'it to discuss completed exploration work in 2020 and 2021 and the proposed scope for 2022.
March 7, 2022	FLNRORD	Teck submitted the proposed 2022 Grassland Reclamation Plan to Emily Cameron from the BC Conservation Data Centre (BC CDC) for review.
March 9, 2022	FLNRORD	Teck received comments from the BC CDC on the proposed 2022 Grassland Reclamation Plan.
March 18, 2022	BC EMLI	Teck submitted its 2022 work plan to BC EMLI. This included the 2022 Grassland Reclamation Plan and Road Deactivation Plan.
March 24, 2022	BC EAO, BC EMLI	Teck met with the BC EAO and BC EMLI to discuss updates on the regulatory process and engagement.
April 7, 2022	BC EMLI, Ktunaxa Nation	Teck received a letter from BC EMLI, on behalf of KNC and Yaq̓it ʔa·knuqƛi 'it , on the MYAB update.
April 7, 2022	BC EAO	Teck provided the BC EAO with a letter regarding the draft Readiness Report.
April 21, 2022	BC EMLI, Ktunaxa Nation	BC EMLI provided Teck with comments following the KNC and Yaq̓it ʔa·knuqƛi 'it MYAB feedback document that was sent to Teck on April 7, 2022.
April 21, 2022	BC EAO, BC EMLI	Teck met with the BC EAO and BC EMLI to discuss updates regarding the regulatory process and engagement.
April 22, 2022	BC EMLI	Teck received a non-approval from BC EMLI on the 2022 work plan due to the departure from approved permit limits and the generalized road reclamation plan submitted.
May 4, 2022	BC EMLI	Teck submitted a revised 2022 work plan to BC EMLI.
May 4, 2022	BC EAO	Teck provided a letter to the BC EAO that provided response to KNC's letter sent on April 8, 2022, requesting an initiation of the dispute resolution process.
May 11, 2022	BC EMLI	Teck received approval from BC EMLI on the 2022 work plan.
May 25, 2022	BC EAO, BC EMLI	Teck met with the BC EAO and BC EMLI to discuss updates regarding the regulatory process and engagement.
June 16, 2022	BC EAO, BC EMLI	Teck met with the BC EAO and BC EMLI to discuss updates regarding the regulatory process and engagement.
June 21, 2022	BC EAO	The BC EAO provided Teck with a letter response to Teck's May 4, 2022, letter regarding dispute resolution.
July 20, 2022	Interested parties Advisory Initiative partners	Teck provided an update presentation on the Project.
July 21, 2022	BC EAO	KNC requested a meeting on the land with the BC EAO (with support from Teck) at the proposed FRX site with the Chief Environmental Assessment Officer and the BC EAO project team on August 25, 2022.

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Date	Group(s) Engaged	Purpose of Engagement
July 22, 2022	BC EAO	Teck responded to the KNC's August 25, 2022 request for a KNC, Yaq̓it ʔa·knuqƛi 'it and BC EAO meeting on the land.
July 26, 2022	BC EAO	KNC informed Teck and the BC EAO that details for the August 25, 2022 meeting were under development.
July 26, 2022	BC EAO	Teck informed the KNC they were open to the approach of invoicing and requested the KNC to clarify any details needed from Teck.
July 27, 2022	BC EAO; BC EMLI	Teck met with the BC EAO and BC EMLI to discuss updates regarding the regulatory process and engagement.
August 17, 2022	BC EAO	KNC followed up with Teck on the details of the meeting on the land on August 25, 2022, with the BC EAO, KNC, and Yaq̓it ʔa·knuqƛi 'it.
August 18, 2022	BC EAO; BC EMLI	Teck provided the BC EAO and KNC with a letter outlining Teck's concerns relating to the readiness referral and decision process for the Project. The letter included Teck's comments and concerns on the process of reaching the decision and informed the BC EAO, KNC, and Yaq̓it ʔa·knuqƛi 'it they would need additional time to respond based on the materials.
August 18, 2022	BC EAO	Teck provided KNC with additional information for the August 25, 2022 meeting on the land. Teck provided details for the helicopter tour and for plan B ground support.
September 7, 2022	BC EAO; BC EMLI	Teck met with the BC EAO and BC EMLI to discuss updates regarding the regulatory process and engagement.
October 20, 2022	BC EMLI	The BC EAO provided Teck with a report produced by the KNC and Yaq̓it ʔa·knuqƛi 'it and reviewed by the BC EAO that summarized the August 24–25, 2022 meetings on the land.
October 26, 2022	BC EMLI	The BC EAO inquired if Teck would be providing comments on KNC and Yaq̓it ʔa·knuqƛi 'it's summary report of the meetings on the land.
October 26, 2022	BC EMLI	Teck responded to the BC EAO to inform them that they did not have comments but were considering the BC EAO's offer to have a meeting on the land with the BC EAO's CEAO, BC EAO, KNC, and Yaq̓it ʔa·knuqƛi 'it
November 16, 2022	BC EAO; BC EMLI	Teck met with the BC EAO and BC EMLI to discuss updates regarding the regulatory process and engagement.
December 6, 2022	District of Sparwood	Teck provided an update on the Project to the District of Sparwood.
December 14, 2022	BC EAO, BC EMLI	Teck met with the BC EAO and BC EMLI to discuss updates regarding the regulatory process and engagement.
February 2, 2023	BC EAO, BC EMLI	Teck met with the BC EAO and BC EMLI to discuss the Readiness Decision.
February 21, 2023	BC EAO, BC EMLI	The BC EAO provided Teck with a Readiness Decision Letter. The letter directed Teck to further engage with KNC and Yaq̓it ʔa·knuqƛi 'it on a Revised DPD.
May 2, 2023	BC EMLI	BC EMLI provided an agenda to Teck and KNC for the May 3, 2023 MYAB annual update meeting.
May 3, 2023	BC EMLI	Teck presented the 2022 Annual Summary of Exploration Activities and discussed the 2023 drilling suspension and planned activities in the annual update meeting with BC EMLI and KNC.
May 4, 2023	BC EMLI	Teck provided BC EMLI and KNC with the presentation from the MYAB annual update meeting.
May 8, 2023	BC EMLI	Teck provided BC EMLI and KNC with draft meeting notes from the May 3, 2023 MYAB annual update meeting.
May 16, 2023	BC EAO, BC EMLI	Teck met with the BC EAO and BC EMLI to discuss updates regarding the regulatory process and engagement.
June 20, 2023	BC EAO, BC EMLI	Teck met with the BC EAO and BC EMLI to discuss updates regarding the regulatory process and engagement.
October 23, 2023	BC EAO	Teck met with the BC EAO to discuss updates regarding the regulatory process, engagement and Readiness Decision process.
November 20, 2023	IAAC	Teck met with the IAAC to discuss the regulatory process, engagement and an update from the Supreme Court of Canada release regarding interim guidance to proponents.
November 29, 2023	BC EAO	Teck met with the BC EAO to discuss updates regarding the regulatory process, engagement and the Readiness Decision process.
December 11, 2023	District of Elkford	Teck provided a Project update to the District of Elkford.
December 12, 2023	Crowsnest Pass	Teck provided a Project update to the Crowsnest Pass mayor and council.
December 18, 2023	District of Sparwood	Teck provided a Project update to the District of Sparwood.
December 20, 2023	BC EAO	Teck met with the BC EAO to discuss updates regarding the regulatory process, engagement and the Readiness Decision process.
January 10, 2024	IAAC	Teck met with IAAC for a quarterly meeting to provide an overview and Project updates from all parties on the ongoing regulatory process and engagement.
February 1, 2024	IAAC	Teck met with IAAC for an update on the Project and received an update from IAAC on the Supreme Court of Canada opinion and upcoming IAA amendments.
February 13, 2024	BC EAO	Teck met with BC EAO to discuss updates regarding the regulatory process, engagement and the Readiness Decision process.
March 12, 2024	BC EAO	Teck met with BC EAO to discuss updates regarding the regulatory process, engagement and the Readiness Decision process.
April 4, 2024	IAAC, BC EAO	Teck provided a letter to regulators with an update on engagement that had occurred with KNC and Yaq̓it ʔa·knuqƛi 'it to date, highlighting efforts to involve KNC and Yaq̓it ʔa·knuqƛi 'it in the engagement process as per the Readiness Decision Letter issued on February 21, 2023.
April 17, 2024	BC EAO	Teck met with BC EAO to discuss updates regarding the regulatory process, engagement, and the Readiness Decision process.
April 29, 2024	IAAC, ECCC	Teck met with IAAC and ECCC to discuss a subset of its wildlife programs in advance of the upcoming field season. These species are either wildlife VCs/subcomponents per the draft TISG/AIR or have recently been listed under the SARA with range in BC.
May 8, 2024	BC EMLI, KNC	Teck met with BC EMLI and KNC to deliver their annual update for Horseshoe Ridge and Castle Mountain.
May 8, 2024	BC EMLI, Yaq̓it ʔa·knuqƛi 'it	Teck met with BC EMLI and Yaq̓it ʔa·knuqƛi 'it to deliver their annual update for Horseshoe Ridge and Castle Mountain.
May 9, 2024	BC EAO	Teck met with BC EAO to discuss updates regarding the regulatory process, engagement and the Readiness Decision process.
June 5, 2024	BC EAO	Teck met with BC EAO to discuss updates regarding the regulatory process, engagement, the Readiness Decision process.
June 10, 2024	BC EMLI, KNC, Yaq̓it ʔa·knuqƛi 'it	Teck met with BC EMLI, KNC, and Yaq̓it ʔa·knuqƛi 'it to go through the annual summaries for both the Project and Horseshoe Ridge exploration programs.
September 12, 2024	IAAC, BC EAO, Piikani Nation	EVR emailed Piikani Nation, copying the IAAC and BC EAO, their responses to the rights impact assessment materials, which included a response letter, an appendix with follow-up questions, and an updated draft of Section 11, assessing Piikani Nation's rights and interests.

Table 8-1: Engagement with Potentially Affected Public, Government Agencies, Non-Governmental Organizations and Technical Advisors about the Project since Preparation of the Provincial Initial Project Description

Date	Group(s) Engaged	Purpose of Engagement
October 9, 2024	BC EMLI, KNC, Yaq̓it ʔa·knuqƛi ’it	EVR met with KNC, Yaq̓it ʔa·knuqƛi ’it, and BC EMLI to provide an overview of the 2025 exploration program and highlight some reclamation work.
December 4, 2024	General Public	EVR shared information about FRX at the EVR Annual Outdoor Recreationalists Meeting.
December 17, 2024	BC EAO	EVR met with BC EAO to discuss updates regarding the regulatory process, engagement and the Revised DPD.
December 15, 2024	IAAC	EVR met with IAAC to discuss updates regarding the regulatory process, engagement and the Revised DPD.
January 16, 2025	BC WLRS, BC MCM, BC EAO	EVR met with the provincial agencies to discuss cumulative effects and status updates to the FRX Project.
January 28, 2025	BC EAO	EVR met with BC EAO to discuss updates regarding the regulatory process, engagement and the Revised DPD.
February 3, 2025	IAAC	EVR met with IAAC to discuss updates regarding the regulatory process, engagement and the Revised DPD.
February 25, 2025	BC EAO	EVR met with BC EAO to discuss updates regarding the regulatory process, engagement and the Revised DPD.
March 28, 2025	District of Elkford	EVR emailed the District of Elkford a Delegation Request Form to provide updates on the FRX Project and request a letter of support for the Project’s regulatory assessment application.
March 28, 2025	District of Sparwood	EVR emailed the District of Sparwood a Delegation Request Form to provide updates on the FRX Project and request a letter of support for the Project's regulatory assessment application.
March 28, 2025	Regional District of East Kootenay	EVR submitted a Delegation Request form to the Regional District of East Kootenay for a meeting with the board in April or May 2025 to provide updates on the FRX Project and request a letter of support for the Project's regulatory assessment application.
April 1, 2025	IAAC	EVR met with IAAC to discuss updates regarding the regulatory process, engagement and the Revised DPD.
April 14, 2025	BC EAO	EVR met with BC EAO to discuss FRX Project update and future meeting request to meet with KNC and Yaq̓it ʔa·knuqƛi ’it on staging.
April 22, 2025	KNC, Yaq̓it ʔa·knuqƛi ’it, BC EAO, IAAC Meeting	EVR met with KNC, Yaq̓it ʔa·knuqƛi ’it, BC EAO and IAAC to discuss staging the FRX project.
April 24, 2025	District of Elkford	EVR confirmed the presentation to the District of Elkford Committee of the Whole for May 12, 2025.
April 28, 2025	IAAC, BC EAO	Discussion on draft Revised DPD layout and format to address deficiencies from Readiness Decision.
May 6, 2025	Municipality of Crowsnest Pass	EVR presented an update on the FRX Project and revised DPD to the Municipality of Crowsnest Pass Mayor and Council.
May 9, 2025	Regional District of East Kootenay	EVR provided an update on the FRX Project and revised DPD to the Regional District of East Kootenay Governance and Regional Services Committee.
May 12, 2024	District of Elkford	EVR provided an update on the FRX Project and revised DPD to the District of Elkford Mayor and Council.
May 20, 2025	District of Sparwood	EVR provided an update on the FRX Project and revised DPD to the District of Sparwood Mayor and Council.
May 20, 2025	BC EAO	EVR met with BC EAO to discuss updates regarding the regulatory process, engagement and the Revised DPD.
May 29, 2025	BC MCM, KNC, Yaq̓it ʔa·knuqƛi ’it	Annual Summary of Exploration Activities (ASEA) Meeting. EVR met with BC MCM, KNC, Yaq̓it ʔa·knuqƛi ’it, to go through the annual summaries for both the Project and Horseshoe Ridge exploration programs.
June 5, 2025	BC WLRS	EVR met with BC WLRS to discuss cumulative effects and technical feedback from the meeting that occurred on January 16, 2025.
June 11, 2025	BC WLRS, KNC, Yaq̓it ʔa·knuqƛi ’it	EVR met with BC WLRS, KNC, and Yaq̓it ʔa·knuqƛi ’it to discuss HEG mitigation for the Project.
June 12, 2025	IAAC	EVR met with IAAC to discuss updates regarding the regulatory process, engagement and the Revised DPD.
June 12, 2025	BC EAO	EVR met with BC EAO to discuss updates regarding the regulatory process, engagement and the Revised DPD.
June 18, 2025	IAAC	EVR met with IAAC to discuss updates regarding the regulatory process, engagement and the Revised DPD.

IPD = Initial Project Description; BC EAO= British Columbia Environmental Assessment Office; BC IHA = British Columbia Interior Health Authority; ECCC = Environment and Climate Change Canada; BC MECCS = British Columbia Ministry of Environment and Climate Change Strategy; FLNRORD = Ministry of Forests, Lands, Natural Resource Operations and Rural Development; US EPA = United States Environmental Protection Agency; DPD = Detailed Project Description; SDFWA = Sparwood and District Fish and Wildlife Association; BC CDC = British Columbia Conservation Data Centre; BC EMLI = British Columbia Ministry of Energy, Mines and Low Carbon Innovation; DFO = Fisheries and Oceans Canada; EKWA = East Kootenay Wildlife Association; MYAB = Multi-Year Area Based; NPI = net positive impact; KNC = Ktunaxa Nation Council; TISG/AIR = Joint Tailored Impact Statement Guideline/Application Information Requirements; VC = valued component; BC WLRS = British Columbia Ministry of Water, Land and Resource Stewardship; BC MCM = British Columbia Ministry of Mining and Critical Minerals; HEG = high elevation grasslands

In addition to the above, formal public comments were received by the IAAC and BC EAO on the IPD documents and as part of the designation requests under the IAA. Public comments were summarized in the following documents:

- Summary of Engagement prepared by the BC EAO (July 31, 2020)
- Summary of Issues prepared by the IAAC (November 13, 2020)

Technical advisors were also invited by the IAAC and the BC EAO to provide comments on an early draft of the July 2021 DPD.

Throughout the engagement process, EVR (formerly Teck) has received valuable feedback on the Project. Key topics of interest received through the engagements listed above, as well as those brought forward during engagements completed prior to preparation of the provincial IPD, are summarized into themes as follows:

- **Water quality** - Potential effects, including cumulative effects, on the Fording River, Elk River, Chauncey Creek, Koocanusa Reservoir (a transboundary waterbody) and the Kootenai River downstream of Koocanusa Reservoir. Concerns focused on the existing selenium (and nitrate) concentrations in these waterbodies and how the potential further increase of concentrations would affect fish and fish habitat and EVR's ability to meet the objectives of the EVWQP, permit requirements related to water quality and other commitments.
- **Fish and fish habitat** - Concerns were raised about potential Project impacts on fish and fish habitat, particularly to WCT. This included concerns regarding impacts to the populations of WCT in the upper Fording River where significant decline has been observed, and in Koocanusa Reservoir. Concerns were raised regarding how potential water quality contaminants from the Project could contribute to population trends and contaminant concentrations in fish tissue in the Elk River watershed and Koocanusa Reservoir. Concerns were raised regarding habitat loss and disturbance to tributaries in the upper Fording River watershed that have already been subject to substantial loss.
- **Bighorn sheep and high elevation grasslands** - Concerns regarding potential effects on Rocky Mountain bighorn sheep in the Elk Valley due to impacts on high elevation grasslands, which were noted as critical winter habitat for Rocky Mountain bighorn sheep.
- **Climate change** - Carbon dioxide and methane emissions from the Project and how this could affect climate change and the provincial and federal GHG emission reduction targets.
- **Indigenous traditional lands** - Impacts to areas of spiritual, cultural and archaeological significance, as well as current use of resources in the Project area and those that may utilize the Project area (e.g., wildlife) and how this would affect Indigenous communities.
- **Human health** - Potential effects on human health due to impacts on the environment, specifically on water and air quality in Canada and the United States.
- **Recreational access** - Potential effects on recreational lands and recreational fishing.
- **Economic stability** - Potential positive effects of the Project to sustain long-term employment and support the economies of the surrounding communities.

- **Sustainability** - Potential positive effects of the Project's contributions to regional conservation efforts and proposed reclamation efforts that would be consistent with ongoing efforts for existing mines in the Elk Valley to reclaim and rehabilitate lands impacted by mining. Comments received were regarding EVR's leadership in forward-thinking technologies to mitigate water quality impacts and their commitment to reclamation activities and minimizing overall environmental impacts.

As noted in Section 1.2.2, the full set of EVR's (formerly Teck's) responses to the Summary of Engagement and Summary of Issues is presented in Appendices A and B, respectively. Additional detailed comments and responses are documented in the Comment Tracking Table for the Project. Details on EVR's actions to respond to these comments are provided in Section 9.1.3.

Technical advisors also identified key topics of interest regarding:

- best achievable technology for water quality and source control and effectiveness of mitigations
- additional information regarding how operational sequencing of the Project would influence closure and land use planning
- Project interactions with the biophysical and human environment and permitting considerations

EVR will continue to work with the potentially affected public, government agencies and non-governmental organizations to identify social, economic and environmental priorities and to define mutually beneficial outcomes and measures of success for the Project. EVR looks forward to continuing to receive feedback to support the development of a socially, environmentally and economically sound Project.

EVR will apply a Gender-Based Analysis Plus (GBA+) approach to engagement on the Project. EVR will continue to engage diverse groups to provide accessible information and to gather and consider feedback received. These efforts include, but are not limited to, engagement with groups of varying genders, age, level of education and ethnicity. EVR has started this work with the establishment of a Project website, located at https://www.glencore.ca/en/evr/fording-river-extension, where Project information and engagement tools can be found. Additional efforts to support EVR's engagement with diverse groups will occur through several methods including in-person engagements, site tours (when possible), phone calls and virtual engagement methods (e.g., teleconference and videoconference).

Some of the groups EVR intends to engage throughout this process include, but are not limited to:

- District of Sparwood
- District of Elkford
- City of Fernie
- Municipality of the Crowsnest Pass
- Regional District of East Kootenay
- residents of Sparwood
- residents of Elkford
- residents of Fernie
- Elk Valley Women Task Force

- College of the Rockies
- School District 5
- Sparwood Seniors Citizens Housing Society
- Fernie Childcare Society
- Fernie Women's Resource Centre
- Fernie Senior Citizens Society
- East Kootenay Addiction Services Society
- Youth Advisory Commission
- Elkford Motor Inn
- Women in Mining representative

EVR is committed to its Inclusion and Diversity Policy, which states:

> *EVR respects and appreciates differences in age, ethnicity, Indigenous origin or heritage, gender, physical attributes, beliefs, language, sexual orientation, education, nationality, social background and culture or other personal characteristics.*

This policy will apply and be followed in the work undertaken to support data collection and the assessment of the Project. Other policies currently in practice within EVR that will be followed when proceeding with engagement of diverse groups include, but are not limited to:

- Code of Conduct
- Supplier Code Conduct
- Human Rights Policy

9.0 Existing Environment

The following information presents a general overview of the existing environment in the vicinity of the proposed Project. As the Project moves through the assessment process, additional information compiled from existing studies and collected through ongoing investigations (Appendix E) will be documented in existing conditions reports. The existing conditions reports will form an important component of the assessment for the Project, providing context and a basis for assessing potential effects. Additional detail about the information to be contained in the existing conditions characterization will be proposed in the draft Joint TISG/AIR and refined through the Process Planning Phase of the assessment process. The draft TISG/AIR is also expected to include the proposed scope of the assessment of the Project, including a list of the VCs proposed to be evaluated.

9.1 Regional Environmental Context

9.1.1 Historical Regional Environmental Context

Coal has been mined in the Elk Valley since the late 1890s, with more intensive coal mining-related activities occurring in the region over the last 50 years. Historically, the Ktunaxa would carry the coal with them to start their fires as they travelled to the different encampments as they followed the seasons in their homeland. Mining activity, combined with other activity, including forestry, urban and rural development, transportation infrastructure, agriculture and other forms of anthropogenic development, has resulted in changes to the biophysical and human environment in the area.

9.1.2 Regional Environmental Studies, Initiatives, Plans and Programs

EVR and its predecessors have been involved in efforts to understand and reduce the effects of mining in the Elk Valley for many years and EVR continues to collaborate in various initiatives that include government agencies, local Indigenous Peoples and other interested parties. A list of existing studies and investigations underway is presented in Appendix E. Other regional actions are guided by various plans and permit conditions associated with current and past mining activities that have evolved to address regional management objectives in the Elk Valley. Examples of initiatives that EVR (formerly Teck) has led or participates in include:

- **The Elk Valley Water Quality Plan (EVWQP)** - In April 2013, the BC Minister of Environment issued Ministerial Order No. M113, which required Teck to prepare an Area-Based Management Plan (ABMP) for the Elk River watershed and the Canadian portion of the Koocanusa Reservoir. In this plan, Teck was to identify the actions it would take to manage water quality downstream of its five mines in the region. In response, Teck developed the EVWQP (Teck 2014), with the objectives of protection of aquatic ecosystem health, management of bioaccumulation of constituents in the receiving environment, protection of human health and protection of groundwater. The EVWQP included an Initial Implementation Plan that outlined the mitigations planned to achieve water quality targets for selenium, sulphate, nitrate and cadmium in surface water at specific locations throughout the Elk River watershed and in the Koocanusa Reservoir. Teck had input from potentially affected Indigenous Peoples, provincial and federal governments, technical experts and other interested parties. *Environmental Management Act* Permit 107517 was put in place to regulate the EVWQP and establishes instream compliance limits at a series of compliance points. The C-Permits under the BC *Mines Act* for each of EVR's operation in the Elk Valley were also amended to set out requirements related to the EVWQP. The EVWQP Regional Water Quality Model (RWQM) is required to be updated every three years. Following the 2020 update, the 2022 IPA was issued, which is an adjustment to the Initial

Implementation Plan. EVR continues to progress implementation of the mitigations identified in the 2022 IPA, with an eight-fold increase in water treatment capacity by 2027 compared to 2020 capacity. With this increased treatment capacity, EVR expects to see the continuation of stabilization and reducing the selenium trend in the Elk Valley (more information is available in the latest EVWQP Progress Update). Another RWQM update was published in October 2024. EVR plans to use the updated RWQM to support water quality mitigation planning and assessment for the Project[25], with Project-specific water quality mitigations identified in the assessment application. Should the Project be approved, the Project-specific water quality mitigations would then be integrated in a subsequent water quality model update and IPA.

Phase 1 of the Plan Amendments of the Elk Valley ABMP are currently ongoing in response to Ministerial Order No. M232-2024 (Order M232) issued on July 9, 2024. The draft Plan is intended to amend the EVWQP which was approved by the Minister of Environment on November 18, 2014, as the Elk Valley ABMP.

- ***Environmental Management Act* Permit 107517** - Following the approval of the EVWQP in 2014, the BC Ministry of Environment issued *Environmental Management Act* Permit 107517. Many of the actions and commitments described in the EVWQP were included as requirements in Permit 107517[26]. Permit 107517 requires that EVR implement a number of management plans and monitoring programs including discharge and receiving environment monitoring programs, regional and site (operation) specific groundwater monitoring programs, regional and local aquatic effects monitoring programs, a calcite monitoring program and management plan, and plans for tributary management, adaptive management, human health and ecological risk assessment, along with other requirements. Should the Project be approved, discharges and monitoring plans associated with the Project would be authorized through Permit 107517.
- **Nickel Management Strategy** - Following the publication of the EVWQP, aquatic effects monitoring programs identified dissolved nickel as an additional constituent of potential concern for sensitive benthic invertebrates in the Elk Valley. Through implementation of EVR's water quality adaptive management plan response framework (Teck 2021a), EVR implemented targeted monitoring programs, conducted investigations to refine understanding of nickel toxicity, and initiated a program to evaluate mitigation technologies. Further to these steps, EVR developed chronic nickel benchmarks (WSP Golder 2022). Since the approval of the chronic nickel benchmarks for the Elk Valley by BC MECCS in July 2023, EVR has applied the benchmarks to assess nickel in the Elk Valley as part of water treatment and mine development projects and applications and in-pit dewatering plans. In May 2024, EVR submitted the Nickel Management Strategy (Teck 2024c), which characterizes current and projected future nickel concentrations and presents a regional nickel management strategy to address nickel in consideration of feasibility and achievability including priority next steps.
- **Calcite Management Plan** - In addition to targets for concentrations of selenium, nitrate, sulphate and cadmium, the EVWQP includes targets for managing formation of calcite in the Elk Valley waters downstream of EVR's mining operations. As part of the EVWQP, EVR developed a program to quantify, monitor and assess potential effects of calcite deposits downstream of its mining operations. Four streams, Greenhills Creek (downstream of GHO), Corbin Creek (downstream of Coal Mountain mine), Elkview Dry Creek and Erickson Creek (both downstream of EVO), were identified as priority streams because they support fish habitat and calcite formation was higher than in other streams. EVR's first calcite management

[25] With the basis of the IPA being the permitted mine plan, mitigations specific to the Project will not be included in the next RWQM update

[26] Other permits, such as EVR's C-permits under the *Mines Act*, incorporate other aspects of the EVWQP.

project, calcite prevention through antiscalant addition, was initiated at Greenhills Creek in 2017. Operational monitoring has continued to confirm the effectiveness of antiscalant addition for calcite prevention and this approach is currently applied at nine water treatment facilities within the Elk Valley. In October 2020, EVR received direction from ECCC setting out further measures to be taken to improve water quality and prevent calcite deposition in waters downstream of FRO and GHO. By 2024 EVR had successfully completed the removal of calcite from approximately 200 m of fish-bearing sections of Clode Creek, Greenhills Creek and Erickson Creek. In 2025, EVR will continue to advance the next phase for calcite removal as directed by the 2025 Calcite Management Plan. EVR is also advancing planning and design of a trial of stream habitat enhancement, where gravel and other habitat features (i.e., large woody debris) are added on top of existing calcite, in stretches where calcite prevention is in place. Greenhill's Creek has been identified as the trial location within the 2025 Calcite Management Plan.

- **Regional Fish Habitat Management Plan (RFHMP)** - The RFHMP was developed as a condition of the LCO Phase II Project Environmental Assessment Certificate #M13-02. The plan provides the details for managing regional scale effects on fish and fish habitat for the current operations in the Elk Valley. The plan is intended to be a living document and is designed to be updated as required, at a minimum of five-year intervals, and was last updated in June 2023 with an additional update planned for 2025. The RFHMP is intended to be developed and implemented through consultation with provincial regulators and Ktunaxa Nation. The purpose of the RFHMP is to develop a strategy for the management of fish habitat at a regional scale through achieving the following strategic objectives:
  - Develop a consistent, accepted approach to conducting fish habitat existing conditions assessments and quantifying fish habitat.
  - Standardize mitigation measures to avoid and minimize effects on fish habitat.
  - Develop a regional offsetting strategy to identify, prioritize, construct and conduct effectiveness monitoring of offsetting measures in relation to EVR's projects causing the harmful alteration, disruption or destruction (HADD) of fish habitat requiring *Fisheries Act* Authorization.
  - Guide one-time fish and fish habitat studies based on fisheries management objectives.
- **Tributary Management Plan (TMP)** - The TMP was developed to meet the requirements of Permit 107517. The TMP details protection and rehabilitation goals for tributaries (creeks and streams) within the Elk Valley and provides guidance for the environmental management of tributaries to be taken into consideration during future mine planning. The TMP complements the EVWQP and supports its objectives. The 2017 TMP was approved; the 2018 update of the plan was not accepted. EVR (then Teck) submitted a new update to BC MECCS on July 31, 2020 that included:
  - a revised definition of "protection" to reflect EMC input
  - the identification of prioritized tributaries for permanent protection and rehabilitation
  - an implementation plan for protection and restoration/rehabilitation for the next three years
  - the inclusion of relevant groundwater monitoring work
  - an explanation of how the TMP will be considered in mine planning, further responses to EMC advice and relevant supporting information

The 2020 update proposed that Chauncey Creek, which is adjacent to the Project, be addressed through the assessment of the Project rather than the TMP, as follows:

> *For this cycle of the TMP, Teck is proposing that activities in Chauncey Creek be covered by terms and conditions issued through the Project assessment by the IAAC and BC EAO. Results of the Project assessment, and the mitigation and monitoring put in place to limit impacts in the watershed, are expected to be included in a Chauncey Creek Management Plan.*

EVR intends to develop this plan through engagement in the assessment process with KNC and Yaq̓it ʔa·knuqƛi ʾit.

- **Environmental Monitoring Committee** - The EMC, consisting of representatives from BC MECCS, BC EMLI, ECCC, KNC, BC Interior Health Authority and EVR, was established to review monitoring and report submissions required by Permit 107517. The EMC prepares an annual public report summarizing monitoring activities reviewed by the committee. The committee's existence, mandate and membership are requirements of Permit 107517. Refer to the most recent EMC public report here.
- **Koocanusa Reservoir Transboundary Monitoring Task Group** - This task group is composed of representatives from the United States (US) Army Corps of Engineers, US Environmental Protection Agency, Montana Department of Environmental Quality, Montana Fish and Wildlife, BC MECCS and EVR. The task group was formed in 2018 to develop a common understanding of current and future water quality monitoring activities and data, with an emphasis on selenium, in the transboundary waters of Koocanusa Reservoir. Early efforts of the task group resulted in the development of a two-year monitoring program that will help to assess the potential for environmental effects in the reservoir. Data collected under the program are uploaded to the US Environmental Protection Agency's Water Quality Data portal here.
- **The Elk Valley Fish and Fish Habitat Committee (EVFFHC)** - The EVFFHC is a multi-agency group that works collaboratively to discuss technical information related to EVR's fisheries obligations in the Elk Valley. The EVFFHC includes membership from the KNC, BC WLRS, Fisheries and Oceans Canada and EVR. The EVFFHC is an example of a multi-agency approach that works in an inclusive manner to advance mitigation planning for fish habitat throughout the Elk Valley. Read more about the EVFFHC here.
- **Reclamation research** - The reclamation research program at FRO was initiated in 1969. The program is designed to further understand biodiversity impacts and test alternative reclamation approaches. The program is regional and knowledge is shared and applied across EVR's Elk Valley sites. Research conducted to date has included the development of ecosystem-specific reclamation practices including landform designs, vegetation prescriptions and site preparation methods. Other research work has focused on understanding key habitat features and forage types for integration into both mine planning and reclamation design to meet the long-term requirements for establishing ecosystems and core wildlife habitat.

  EVR has also designed and transitioned novel models into operational use to support reclamation planning and implementation. These models include: a vegetation quality assessment tool (evaluates the quality of reclaimed areas in comparison to native benchmark ecosystems); wildlife and vegetation species-specific local and regional models (enables assessment of reclaimed area habitat suitability, quality and class); and ecohydrological models (enables strategic placement of soil resources to target specific ecosystem types).

  EVR has partnered with the University of Alberta to conduct a four-year research program focused on the reclamation of high elevation grasslands (HEG). The primary objectives of the program are to:

  - Investigate feasible and cost-effective methods to enhance growth mediums, including types and depths of cover materials

- Identify ecosystem indicators to evaluate reclamation success indicators and understand trajectories for HEG reclamation sites
- Investigate methods to manage undesirable plant species when cover materials area placed

Learnings will be implemented through improvements or refinements to reclamation practices including reclamation planning and design.

- **Elk Valley Cumulative Effects Management Framework (EV-CEMF)** - Recognizing the need for a broadly accepted, credible and workable approach to the assessment and management of cumulative effects in the Elk Valley and as a condition in the Environmental Assessment Certificate for the LCO Phase II Project, EVR and the KNC held a multistakeholder workshop with the goal of better understanding and managing cumulative effects in the Elk Valley. As an outcome of this workshop, the EV-CEMF was launched. The EV-CEMF consists of a diverse working group, including the KNC, industry, community organizations and provincial government ministries, that provides feedback and advice on EV-CEMF activities. The EV-CEMF selected five VCs for the first phase of study: riparian habitats, old and mature forest, grizzly bear (*Ursus arctos horribilis*), bighorn sheep (*Ovis canadensis*) and WCT (*Oncorhynchus clarkii lewisi*). Deliverables from the EV-CEMF include results of retrospective and prospective assessment, along with management responses including mitigations to help inform natural resource management decisions. Other VCs are expected to be included in future phases of the EV-CEMF. In 2025, the EV-CEMF has continued to evolve and has provided draft stewardship objectives, including outcomes (desired state for a VC), objectives (direct tangible results required to achieve the desired outcome), indicators (metrics used to express progress towards objectives), and targets (quantifiable goal for an indicator). EVR will incorporate the available updated information from CEMF, as well as the addition of new CEMF VCs, such as high elevation grasslands, into the appropriate VC sections of the FRX Project IS/A. As the CEMF continues to move forward, EVR intends to remain an active member of the working group, providing information, data, scientific expertise and recommendations. Find out more about the EV-CEMF here.
- **Biodiversity Management Technical Advisory Group (TAG)** - As a condition in the Environmental Assessment Certificate for the FRO Swift Project, EVR, the KNC, BC MoF, BC WLRS and BC EMLI established the Biodiversity Management TAG. Per the FRO Swift Project Environmental Assessment Certificate (M15-02), the purpose of the Biodiversity Management TAG is to provide scientific, technical and Indigenous advice on biodiversity mitigation strategies and actions for EVR operations in the Elk Valley. The focus of advice includes reclamation, restoration, offsetting and compensation, monitoring and research. The Biodiversity Management TAG meets regularly through the year and has a strong focus on providing advice for EVR's Biodiversity Management Plans and Terrestrial Cumulative Effects Management Plan. EVR has undertaken substantial scientific works about the existing environment to help inform discussions of the TAG, including developing bighorn sheep carrying capacity and population viability models, undertaking disease assessments for whitebark pine (*Pinus albicaulis*), validating EVR's habitat suitability index models, and mapping brushland and grassland ecosystems at the scale of the Elk Valley.
- **Commitment to Nature Positive** - In 2024, Glencore made a commitment that EVR will become a nature positive business by conserving or rehabilitating at least three hectares for every one hectare affected by its mining activities going forward. To support the nature positive commitment, EVR is continuing large scale reclamation programs and conservation management, including implementing a Joint Management Agreement with Ktunaxa on management of over 7000 ha of conservation lands. The FRX Project will work to support EVR's nature positive initiative.

- **Air Quality Monitoring Program** - EVR has an extensive air monitoring network in the Elk Valley to track trends in ambient air quality.
- **Net zero by 2050** - As part of its commitment to climate action and responsible resource development, EVR has committed to a long-term goal to net zero in respect of Scope 1 and 2 emissions by 2050 and a commitment to work with partners towards an ambition to achieve net-zero Scope 3 emissions by 2050, recognizing that achievement is uncertain and we cannot ensure the outcome alone. This will include looking at alternative ways of moving materials at EVR's mines, using cleaner power sources and implementing efficiency improvements, among other measures.

EVR also contributes to and collaborates with other organizations to benefit conservation and the environment in the Elk Valley. For example, EVR supports and contributes to the conservation efforts to benefit ungulate winter range enhancement on The Nature Trust of BC's Big Ranch property, BC WLRS's regional grizzly bear deoxyribonucleic acid (DNA) studies, the Sparwood Fish and Wildlife Association's West Elk Valley bighorn sheep study, and the Sparwood Fish and Wildlife Association's regional elk (*Cervus canadensis*) collar study. EVR has directly and indirectly (through other organizations) supported the securement of lands for conservation in excess of 17,000 ha, of which 7,150 ha are in the Elk and Flathead Valleys. EVR is working with the BC Ministry of Transportation and Infrastructure and other organizations to implement Phase 1 of the Highway 3 connectivity corridor and Alexander-Michel corridor Highway 3 overpass and looking to support EV-CEMF objectives through reducing road density by taking actions on rehabilitating roads on EVR's private lands.

9.1.3 Regional Environmental Challenges

Some of the existing environmental challenges in the Project region are of note to potentially affected Indigenous Peoples, government agencies and other interested parties. EVR has received feedback and information on these challenges through engagement on prior project application review processes, various regional initiatives and engagement on the Project prior to and after submitting the July 2021 DPD (Sections 1.2.4 and 1.2.5). Table 9.1-1 provides a summary of key challenges and current and proposed actions to address each.

The Project plans and designs will consider these challenges and work to avoid or reduce Project-related effects in the area while working with broader initiatives (Section 9.1.2) to understand and address the challenges.

Table 9.1-1: Recent Environmental Challenges in the Project Region

Environmental Factor	Issue Summary	Actions
Terrestrial cumulative effects	Cumulative loss of habitat such that protection or management of remaining habitat is important for maintaining several regional values including: • bighorn sheep • grizzly bear • old growth and mature forests • grassland and brushland ecosystems • wetland ecosystems • riparian and flood ecosystems • whitebark pine	**Current actions being undertaken by EVR:** • Implementing the Terrestrial Cumulative Effects Management Plan and various individual ecosystem/species management plans. • Conducting reclamation research and progressive reclamation. • Implementing the BC Policy for Mitigating Impacts on Environmental Values and EVR's mitigation hierarchy[(a)] in mine design and reclamation strategy. • Conducting annual regional road rehabilitation. • Completing bighorn sheep monitoring programs. • Considering enhancements in degraded habitat until reclamation in other areas is complete. • Developing and implementing the offsetting strategy. **Actions proposed as part of FRX:** • Including appropriate management practices and individual ecosystem/species management plans in design considerations for the Project. • Applying the BC Policy for Mitigating Impacts on Environmental Values and EVR's mitigation hierarchy in mine design and reclamation planning. • Incorporating of landscape level information into reclamation planning to support habitat connectivity.
High elevation grasslands and brushlands	Mining steelmaking coal in the Elk Valley often removes high elevation grasslands and brushlands of conservation concern in BC, with some impacts seen as unmitigable loss.	**Current actions being undertaken by EVR:** • Drafting the High Elevation Grassland Ecosystem Management Plan. • Conducting mapping and field validation of the relative abundance, distribution and condition of grasslands and brushlands in the region. • Conducting high elevation grassland reclamation research, and progressive reclamation efforts including seed collection and development of reclamation prescriptions for high elevation grassland communities. • Reclaiming exploration disturbance in high elevation grasslands, as outlined in exploration permit(s), including associated monitoring program. • Considering possible adjustments to mine design and reclamation strategy for existing and future impacts. • Completing a forest encroachment trial. • Managing invasive plants. • Considering possible offsets. **Actions proposed as part of FRX:** • Integrating the draft High Elevation Grassland Ecosystem Management Plan, including application of the BC Policy for Mitigating Impacts on Environmental Values and EVR's mitigation hierarchy[(a)] in Project planning. • Evaluating reclamation research opportunities to contribute to reclamation planning.
Whitebark pine	Mining steelmaking coal in the Elk Valley often removes whitebark pine, which is a federally listed endangered species and under stress due to disease, climate change, mountain pine beetle infestation, and fire and fire suppression.	**Current actions being undertaken by EVR:** • Implementing the Whitebark Pine Species Management Plan. • Collecting whitebark pine seed. • Establishing and operating a whitebark pine orchard to secure a rust-resistant seed source for reclamation, offsetting and other regional projects, contributing to blister rust resistance efforts (seed and parent trees). • Including whitebark pine in reclamation planting. • Participating in provincial working groups to support provincial whitebark pine recovery. **Actions proposed as part of FRX:** • Integrating the Whitebark Pine Species Management Plan, including application of the BC Policy for Mitigating Impacts on Environmental Values and EVR's mitigation hierarchy[(a)] (up to and including offsets, as necessary) in Project planning.

Westslope Cutthroat Trout	Fall 2019 surveys showed a significant decline in WCT (approximately 93% in adults and 74% in juveniles) in the upper Fording River. 2022 monitoring data from the upper Fording River showed a six-fold increase in the adult population compared to 2019 following the decline window. Estimated populations continued to show improving trends, with 2023 estimated populations of approximately 8,000 adults and greater than 16,000 juveniles. These adult populations are currently at the highest levels since the study began in 2012. More information about the status of WCT in the upper Fording River is presented in Section 9.3.3.	**Current actions being undertaken by EVR:**
		• Implementing operational changes at FRO and GHO to reduce potential stress to the population, including precautionary measures in the upper Fording River, such as:
		  ○ Sourcing of operational water needs from non-environmental flow needs (or least risk environmental flow needs [e.g., stored pit water] withdrawal points) to avoid exacerbating low flow conditions during periods of natural low flow.
		  ○ Conducting continuous monitoring of instream flows and environmental conditions to inform relative environmental flow needs requirements for the operation.
		  ○ Reviewing of Erosion and Sediment Control Management Plan in preparation for spring freshet to focus areas of concern, minimize potential for sediment deposition and release to Fording River.
		• Establishing a WCT Trout Working Group that includes EVR, BC and KNC.
		• Collaborating with the KNC, regulators, government agencies and experts to understand the decline.
		• Continuing meetings with KNC and government agencies to discuss WCT objectives.
		• Developing a strategy that will support operationalization of the goals and objectives for WCT led by the BC government and KNC.
		• Conducting ongoing initiatives associated with the Regional Fish and Fish Habitat Management Plan and TMP.
		• Finalizing an Evaluation of Cause process after the 2019 decline of WCT in the upper Fording River to investigate and report (EOC Team 2021) on the likely causes using qualified professional subject matter experts and input from KNC, various regulatory agencies and the independent scientist of the EMC. Completed in 2022.
		• Planning and implementing under the province's and KNC's WCT objectives for the upper Fording River has been advanced by EVR with collaboration from KNC and regulatory agencies to support population resilience in the upper Fording River.
		Actions proposed as part of FRX:
		• Considering outcomes from current actions above, including outcomes from the WCT Working Group, in Project planning, as relevant.
		• Developing a tributary-specific management plan as part of the environmental assessment as outlined in the TMP.

Table 9.1-1: Recent Environmental Challenges in the Project Region

Environmental Factor	Issue Summary	Actions
Water quality	Instream concentrations are not meeting permit limits at some locations. Monitoring data from locations such as Michel Creek indicate that selenium concentrations are stabilizing and reducing. In 2024, the lowest selenium and nitrate concentrations in the upper Fording River downstream of treatment were achieved since 2015. Overall, in the Elk River and Koocanusa Reservoir, data indicate that selenium concentrations are stabilizing, and EVR expects further reductions as additional treatment is completed.	**Current actions being undertaken by EVR:** • Progressing implementation of the EVWQP and constructing 77,500 m^3/d of treatment capacity from proven technologies of AWTFs and SRFs. For further detail see Section 4.4.2. • Removing between 95% and 99% of selenium from treated water through current water treatment facilities. Since the creation of the EVWQP, EVR has invested over $1.4 billion towards water quality monitoring, management, research and construction of four treatment facilities at LCO, FRO and EVO. A further $550 million is planned to be invested by the end of 2024. Refer to the EVWQP Progress Update for more information. • Conducting detailed investigation of potential groundwater flow paths and attenuation mechanisms in the vicinity of Fording River, Kilmarnock Creek and other tributaries in this area to estimate and assess potential groundwater collection to treatment facilities. Collection and treatment of Kilmarnock Creek in the 2022 IPA. • Implementing source control (e.g., change in blasting procedures to reduce nitrate residuals in mine rock).[27] • Conducting ongoing evaluation and research on constituent impacts, treatment and source control. • Updating EVR's RWQM and adjusting EVR's Implementation Plan to achieve objectives in the EVWQP and compliance with *Environmental Management Act* Permit 107517. • Including source control in design considerations for new projects. **Actions proposed as part of FRX:** • Building the Project's water quality management plan on existing water treatment plans and successes in mine design, source control, treatment, and research and development relevant to the Elk Valley. The water quality management plan is intended to support meeting the objectives of the EVWQP and makes allowance for adaptation of improvements in technology to be incorporated as the Project evolves. Additional details about EVR's water quality management plan for the Project are included in Sections 4.4 and 5.3.4 and 10.1. • Evaluating the Project's potential water quality effects within the context of the regional water quality initiatives.
Water quality emerging issues	Ongoing water quality improvement efforts and research have identified that nickel may also be a water quality constituent of concern.	**Current actions being undertaken by EVR:** • Researching nickel impacts, including research to identify concentrations that are protective of aquatic life in the Elk Valley, treatment and source control. • Evaluating nickel mitigation options and development of the Nickel Management Strategy (Section 9.1.2). **Actions proposed as part of FRX:** • Integrating the Nickel Management Strategy into Project planning and assessment, as available.
Climate change	Carbon dioxide and methane emissions from the Project and how this could affect climate change and the provincial and federal GHG emission reduction targets.	**Current actions being undertaken by EVR:** • Monitoring advances in carbon capture, utilization and storage technologies that will reduce the emissions of coal-based steel production. • Reducing carbon emissions by sourcing and using more renewable energy to power operations. In 2020, 97% of electricity that Teck used across all operations in BC was sourced from renewable, zero-carbon power sources. • Working to identify and implement zero-carbon options for transportation across operations. Transportation is a significant source of emissions for EVR's operations, whether that is vehicles needed to operate the mines or the vehicles EVR employees use to get to work. In 2019, two electric buses were introduced for crew transport at FRO and GHO. • Producing steelmaking coal at a lower average emission intensity than what is produced in other countries worldwide (Skarn Associates 2021), which can displace the use of other higher emission intensity coal in steel production, lowering overall global GHG emissions from steelmaking coal. **Actions proposed as part of FRX:** • Considering GHG implications in Project plans and designs. • Committing to continuous improvement and, where appropriate, adopting new technologies as they become available and technically and economically feasible for use. • Discussing predicted Project GHG emissions as well as potential future changes to support EVR's 2050 carbon neutrality goals. • Producing hard coking coal amongst the highest quality in the world, improving blast furnace efficiency and emitting less carbon dioxide per tonne of steel than steelmaking coal produced elsewhere (Teck 2022a).
Indigenous rights and interests	Potential effects on Indigenous cultural practices, transmission of knowledge, sense of food security, stewardship authority and relationship to the land.	**Current actions being undertaken by EVR:** • Respecting the rights, cultures, interests and aspirations of Indigenous Peoples as described in the Human Rights Policy (Glencore 2025) and being committed to building strong and lasting relationships that helps to foster understanding of each other's perspectives and priorities. EVR is committed to meaningful consultation and engagement with Indigenous Peoples and their involvement in informing the development of regulatory applications. • Engaging with local Indigenous Peoples on EVR's regional initiatives as outlined in Section 9.1.2. • Working directly with Ktunaxa Nation to gain perspective on and measure the progress of addressing pre-existing issues and where progress needs to be demonstrated through a process grounded in the Ktunaxa stewardship principles and the concept of Yaqaƚ Hankatiƚiƚki na ʔamak which means "Our people care for the land and the land cares for our people." • Contributing to more than 7,000 ha of conservation lands through existing operations, which are jointly managed with the KNC through a Joint Management Agreement. • Through the Cultural Working Group, working to secure access to locations within EVR sites for specific ceremonial purposes for Ktunaxa spiritual leaders. The Cultural Working Groups is also pursuing the finalization of a Cultural Management Plan, which would both provide EVR access to Ktunaxa cultural knowledge and provide guidance on means by which that knowledge may be utilized within EVR operations. • EVR holds interim agreements with three of the four Ktunaxa First Nations, which specifically contemplate the identification and pursuit of community priorities and cultural activities. **Actions proposed as part of FRX:** • Engaging with potentially affected Indigenous Peoples to evaluate the Project's effects on their rights and interests, including spiritual, cultural and archaeological, and resource use interests. Refer to Sections 7.0 and 10.0 for additional information on this topic.

[27] Reducing nitrate residuals is anticipated to positively influence water treatment effectiveness for selenium. Both active water treatment facilities and saturated rock fills reduce nitrates before reducing selenium. With less nitrates in the water due to source control, more selenium can be removed.

Table 9.1-1: Recent Environmental Challenges in the Project Region

Environmental Factor	Issue Summary	Actions
Human health	Potential effects on human health due to impacts on the environment, specifically on water and air quality in Canada and the US.	**Current actions being undertaken by EVR:** • Undertaking ongoing monitoring of water and air quality conditions in the Elk Valley. • Working to update a regional Human Health Risk Assessment required under the regional *Environmental Management Act* Permit 107517. The study contributes to identification of risk management controls and mitigations to address human health risks and includes review and input from a task group (the Human Health Working Group) formed in 2018 with representatives from KNC, BC Interior Health Authority, BC MECCS, the First Nations Health Authority and EVR. The updated regional Human Health Risk Assessment was submitted to BC MECCS on October 20, 2023. The BC MECCS informed EVR on January 23, 2024, that the assessment met the conditions stipulated in Permit 107517 and marks a significant milestone in the advancement of the shared understanding of human health risk associated with exposure to mine-related parameters of concern. While the comprehensive Human Health Risk Assessment is complete, work to refine understanding and to monitor human health risk will continue. As required by Pemit 107517, the focus has shifted to regular ongoing screening of the key consumption-based exposure pathways identified in the Human Health Risk Assessment, and the evaluation, reporting, and public communication of the screening results. Thus, in consultation with the Human Health Working Group, EVR began developing the *Human Health Data Evaluation Program* and the *Human Health Fish Assessment Program* in February 2024. These programs were submitted to BC MECCS on November 30, 2024. Once approved, these programs will be implemented in 2025. • Undertaking a *Particulate Matter Inhalation and Deposition Pathway Scoping Study* (also a requirement under Permit 107517) to improve understanding of exposure and human health risk associated with air quality influenced by EVR's mining operations. The study design is currently under development, in consultation with the Human Health Working Group. The study will be conducted in 2025 with the final report expected in 2026. • Working directly with Ktunaxa Nation to gain perspective on and measure the progress of addressing pre-existing issues and where progress needs to be demonstrated through a process grounded in the Ktunaxa stewardship principles and the concept of Yaqaɬ Hankatiɬiɬki na ʔamak which means “Our people care for the land and the land cares for our people.” **Actions proposed as part of FRX:** • Including an assessment of the risk of the Project to human health in the Project assessment. The scope for this assessment will be proposed in the draft TISG/AIR to be submitted to the IAAC and BC EAO. • Implementing actions as outlined under the water quality environmental factor.
Recreational access	Potential effects on recreational lands and recreational fishing.	**Current actions being undertaken by EVR:** • Engaging regularly with the public and with outdoor enthusiast groups (including hunting and fishing clubs) to understand access concerns and access options for all EVR operations. For example, access is a key area of engagement for the closure and reclamation of EVR’s Coal Mountain mine. • Working with the Ktunaxa to support trail mapping in the Elk Valley through the Cultural Working Group. • Contributing to more than 7,150 ha of conservation lands through existing operations, which are jointly managed with the KNC through a Joint Management Agreement. **Actions proposed as part of FRX:** • Working with interested parties to identify opportunities to manage and mitigate recreational access impacts. This will be achieved via providing future engagement opportunities on the Project website, holding topic-specific meetings as requested and as EVR has information to share. • Considering access during closure planning.
Economic stability	Potential positive effects of the Project to sustain long-term employment and support the economies of the surrounding communities.	**Current actions being undertaken by EVR:** • Contributing to the local economies in and around the Elk Valley, especially Elkford, Sparwood, Fernie and Crowsnest Pass. EVR and FRO’s economic support to these communities comes through employment, community investment, local purchases, rentals and a formal mine-property tax sharing pool. EVR’s Elk Valley operations employ over 5,000 people, including 1,500 at FRO. Many of those employed are from the local communities, contributing to the local and provincial economies and tax bases. • Generating $6.7 billion in direct economic contributions, including GDP, labour income and government revenue, through EVR’s steelmaking coal operations. As a result, the steelmaking coal business unit accounted for 57% of Teck’s $15.0 billion revenue and 78% of its $7.0 billion gross profit. In 2023, Teck produced 23.7 million tonnes of steelmaking coal, representing approximately 85% of Canada’s total production (Teck 2024b), of which FRO accounts for nearly 35%. • Securing the long-term viability of EVR’s assets, operations and business in the Elk Valley, including FRO’s one-third portion of the $4.6 billion in economic contributions generated by EVR’s activities in the Elk Valley (Deloitte 2022). **Actions proposed as part of FRX:** • Evaluating economic benefits of the Project during the assessment of the Project. EVR will propose the scope of this assessment in the draft TISG/AIR to be submitted to the IAAC and BC EAO. • Evaluating the effects of mine closure on long-term economic stability and development in the assessment of the Project and addressing through mine closure planning. EVR will propose the scope of this assessment in the draft TISG/AIR to be submitted to the IAAC and BC EAO. • Additional information regarding potential Project benefits is included in Section 5.1.4 and consequences of No Project, summarized in Section 3.1.

Table 9.1-1: Recent Environmental Challenges in the Project Region

Environmental Factor	Issue Summary	Actions
Sustainability	Potential positive effects of the Project's proposed reclamation efforts that would be consistent with ongoing efforts for existing mines in the Elk Valley to reclaim and rehabilitate lands impacted by mining. Comments received were regarding EVR's leadership in forward-thinking technologies to mitigate water quality impacts and their commitment to reclamation activities and minimizing overall environmental impacts.	**Current Actions being undertaken by EVR:** • Committing to responsible resource development. EVR is focused on operating sustainably, the health and safety of employees and building strong relationships with communities. • Glencore is a participating member of the Mining Association of Canada and International Council on Mining and Metals. As a member, EVR is committed to responsible mining and adheres to the guiding principles of the Towards Sustainable Mining framework and the International Council on Mining and Metals Mining Principles and associated performance expectations. • Working on regional environmental initiatives and regulatory processes focused on current and legacy conditions, including water quality management, reclamation and restoration initiatives as outlined Sections 4.4, 5.6 and 9.1.2. • Continuing to advance these efforts to improve environmental performance and build public confidence. • Working directly with Ktunaxa Nation to gain perspective on and measure the progress of addressing pre-existing issues and where progress needs to be demonstrated through a process grounded in the Ktunaxa stewardship principles and the concept of Yaqaƚ Hankatiƚiƚki na ʔamak which means "Our people care for the land and the land cares for our people." **Actions proposed as part of FRX:** • Considering EVR's sustainability goals in Project planning. • Integrating sustainability principles into Project planning and assessment; the Project contribution to sustainability will be described in the IS/A.

a) Refer to Section 10.0 for further information on EVR's mitigation hierarchy.

WCT = Westslope Cutthroat Trout; GHO = Greenhills Operations; KNC = Ktunaxa Nation Council; EMC = Environmental Monitoring Committee; EVWQP = Elk Valley Water Quality Plan; AWTF = active water treatment facility; SRF = saturated rock fill; LCO = Line Creek Operations; EVO = Elkview Operations; EVWQP Implementation Plan Adjustment; GHG = greenhouse gas; BC MECCS = British Columbia Ministry of Environment and Climate Change Strategy; TISG/AIR = Joint Tailored Impact Statement Guidelines/Application Information Requirements; IS/A = Impact Statement/Application; TMP = Tributary Management Plan

9.2 Physical Environment

The Project footprint straddles portions of FRO and Castle Mountain in the Fording River Valley (Figure 5.1-1). The area of new disturbance within the Project footprint consists primarily of forested habitat interspersed with non-forested ecosystems such as grasslands and avalanche paths. Some of these ecosystems have been previously disturbed by exploration and forestry activities. Mining disturbance (including mine rock storage) primarily exists in the catchments of Kilmarnock Creek and Clode Creek.

The Project footprint experiences a continental cold climate, with elevation, slope, aspect and proximity to the Fording River representing important influences on temperature, precipitation and wind speed. Snow cover in the Fording River Valley is relatively consistent from November through March, with greater snowfall and associated snowpack accumulation occurring from January through March and with increasing elevation. Rainfall is generally moderate in the summer months with no defined dry season. Rainfall accumulation also increases with elevation. Wind through the region is mainly channelled through the Fording River Valley, meaning that the predominant winds are from the south–southeast and south, although winds from the northwest are also common.

Air emissions from FRO are primarily made up of PM, SO_2, nitrogen dioxide (NO_2) and GHGs (Sections 5.4.2 and 5.4.3). The PM emissions arise from mining activities such as drilling, blasting and material handling. The SO_2 and NO_2 emissions are produced by the detonation of explosives for blasting and the combustion of fossil fuels in vehicles, equipment and coal dryers. Sources of GHG emissions include fossil fuel combustion as well as fugitive coalbed methane.

Mining activities that generate noise include coal extraction, material handling and stockpiling as well as activities associated with blasting, shovels, haul trucks, drills and auxiliary equipment.

Castle Mountain is currently undisturbed by active mining and is bordered by Kilmarnock Creek and the actively mined Eagle Mountain to the north, the Fording River and the actively mined Greenhills Range to the west, and Chauncey Creek and the High Rock Range to the east and south. The topography along the upper portions of Castle Mountain is steep, with typical slopes of approximately 0.4 m/m or 40%. The topography along the lower portion of the west side of Castle Mountain (facing the Fording River) includes shallower slopes of approximately 0.1 m/m or 10%. Elevations near the Project footprint range from approximately 1,550 metres above sea level (masl) at the valley floor (near the Fording River) to approximately 2,550 masl at the peak of Castle Mountain.

Drainage at Castle Mountain consists of a network of relatively small-sized watercourses that collect runoff from the surrounding terrain and support ephemeral or intermittent flow conditions. Flows from these watercourses ultimately report to larger Fording River tributaries such as Chauncey and Kilmarnock creeks or directly to the Fording River as summarized below:

- Runoff from the north side of the mountain drains to Kilmarnock Creek, which flows west toward the Fording River and passes through an approximately 3 km long channel located under an existing mine rock storage area immediately north of Castle Mountain. Approximately 30% of the catchment area of Kilmarnock Creek has been disturbed by historical and active mining activities. These mine disturbance areas are located primarily in the lower half of the catchment of Kilmarnock Creek.

- Runoff from the east and south sides of Castle Mountain drains to Chauncey Creek, which flows southwest toward the Fording River. The catchment area of Chauncey Creek is unaffected by direct impacts from mining activities and includes tributaries from the High Rock Range extending to the Continental Divide.
- Runoff from the west side of Castle Mountain drains to a series of small tributary channels that report to the Fording River. Recent assessment of these tributaries indicates that a number of them are ephemeral and only have surface water flow some of the time in direct response to rainfall or snowmelt.

In addition to the catchment areas that drain from Castle Mountain, Project activities are also expected to influence drainage from the already mine affected catchment area of Clode Creek (located to the north of the Kilmarnock Creek catchment). Clode Creek drains generally west to southwest toward the Fording River and includes both active and passive flow contributions, recognizing that partially backfilled pits (specifically Eagle 4 Pit and Eagle 6 West Pit) are known to passively drain to Clode Creek. The southern half of the Clode Creek catchment is extensively mined with approximately 50% of the watershed disturbed by FRO.

The Fording River drains generally south and discharges to the Elk River. Stream flows in the Fording River at the mouth typically peak in June, coinciding with rainfall and late snowmelt, although peak flows can occur in May from snowmelt and rain-on-snow events. The Elk River flows generally southwest and discharges to Koocanusa Reservoir at a location approximately 100 km downstream of the mouth of the Fording River.

Surface water quality data collected by EVR (formerly Teck) have shown that mine-influenced water at FRO can generally be characterized as slightly alkaline with concentrations of nitrate, sulphate and selenium that are higher than in watercourses without mining development. Water quality in the Fording River upstream of existing mining operations is low in nutrient and trace element concentrations. Nitrate, selenium and sulphate concentrations increase in the river downstream of Cataract, Swift, Clode and Kilmarnock creeks (all of which are influenced by mining activities), but concentrations within the Fording River are lower than those observed in the mine-influenced tributaries. With the exception of the surface water flows from the catchment area of Kilmarnock Creek, surface water flows from the undisturbed portion of the Project footprint include water quality characteristics that are representative of areas uninfluenced by mining.

Soils in the undisturbed portion of the Project footprint are influenced by topographic relief, parent materials, local climate and biota. In general, Brunisols develop on gentle to moderate slopes with coarse- to medium-textured parent materials at low to mid-elevations, while Regosols occur on moderately steep to steep slopes at mid- to high elevations. Regosols occur predominantly on medium- to coarse-textured colluvial or weathered bedrock deposits and are commonly associated with shallow lithic soils at high elevations (Lacelle 1990). Organic soil deposits including Mesisols may be present in association with the peatland group of wetlands in the area.

9.3 Biological Environment

This section of the Revised DPD characterizes biological environment conditions, including ecosystems and vegetation, wildlife and wildlife habitat, fish and fish habitat, species at risk and ecologically sensitive areas in and around the Project area.

9.3.1 Ecosystems and Vegetation

Human activities over the past century have had an influence on ecosystems and vegetation in the Elk Valley, with greater impacts at lower elevations. Forestry and coal mining development have occurred in the Elk Valley for more than 100 years. Other influences in the region include, but are not limited to, agriculture, power lines, well sites, pipelines, railways, highway, rural development, recreation and tourism, and the communities of Sparwood, Elkford and Fernie; Figure 1-1 shows the Project regional location.

The Project footprint is situated in the Elk Valley Ecosection and the Rocky Mountain Forest District. There are two main biogeoclimatic zones in the footprint: Engelmann Spruce – Subalpine Fir zone and Montane Spruce zone.[28]

The Engelmann Spruce – Subalpine Fir zone occurs throughout the East Kootenay Region at mid- to high elevations and is generally mountainous, steep and rugged. Undisturbed steep mountain sides have old growth spruce and subalpine fir forests and are snow-covered in winter months. This zone also contains meadows, grasslands, brushlands and whitebark pine habitat. Herbaceous species such as subalpine daisy, common red paintbrush, western meadow rue, Sitka valerian and green false-hellebore are common in meadows in this zone.[29] Grasslands in the zone contain rough fescue, Idaho fescue, pinegrass, timber oatgrass, diverseleaved cinquefoil, yellow beard-tongue and thread-leaved sandwort. Notably, many of the grassland and brushland ecological communities in this zone have been identified as ecological communities at risk.[30] Within the Project footprint the following biogeoclimatic subzones occur: Elk dry cool Engelmann Spruce – Subalpine Fir variant; dry cool woodland Engelmann Spruce – Subalpine Fir subzone; and dry cool parkland Engelmann Spruce – Subalpine Fir subzone.

Avalanches are natural disturbances in the Engelmann Spruce – Subalpine Fir zone that result in small patches of unique communities adjacent to larger patches of different ecosystem types, increasing regional diversity (Quinn and Phillips 2000). Plant species present in avalanche areas are often like those found in the surrounding landscape, but the communities differ in composition and structure because succession is stalled due to repeated disturbance and higher soil moisture, favouring shade-intolerant species, shrubs and herbs as opposed to trees (Bebi et al. 2009; Quinn and Phillips 2000). Where trees occur in avalanche tracks, the trees are often shrub-sized due to continual pruning from avalanche events and are limited from developing into true forest.

The Montane Spruce zone occurs in the East Kootenay Region at low to mid-elevations with a growing season that tends to be warm and dry. The vegetation of the Montane Spruce zone has tree stands dominated by hybrid Engelmann × white spruce,[31] subalpine fir, Douglas fir and western larch. Prominent shrub species include false azalea, Utah honeysuckle, soopolallie and falsebox. The herb layer frequently contains grouseberry, twinflower, pinegrass and heart-leaved arnica. Red-stemmed feather moss and step moss are the dominant moss species.

[28] Information regarding biogeoclimatic zones and ecosystems within the Project footprint was summarized from Meidinger and Pojar (1991), Braumandl and Curran (2002) and MacKillop et al. (2018), unless otherwise cited.

[29] Scientific names of the plant species listed in this document can be found in Appendix F.

[30] Species at risk, including plant species, are discussed in Section 9.3.4. A discussion of ecologically sensitive areas, including ecological communities at risk, is provided in Section 9.3.5.4.

[31] The notation “Engelmann x white spruce” means a tree species that is a hybrid between an Engelmann spruce and a white spruce.

One of the most distinctive features of the landscape is the extensive, young and maturing stands of lodgepole pine. The dry warm Montane Spruce subzone is the only subzone in this zone that occurs in the footprint.

9.3.2 Wildlife and Wildlife Habitat

The undisturbed portion of the Project footprint provides habitat for a variety of wildlife species.[32] For example, the conifer forests, grasslands and whitebark pine stands provide habitat for wildlife such as red squirrel, snowshoe hare, marten, pine siskin and Clark's nutcracker. Stands of lodgepole pine provide summer and fall range as well as cover for elk and mule deer. Birds such as the three-toed woodpecker that forage on bark-inhabiting insects are also common in the pine forests.

Avalanche tracks that occur within the Project footprint provide summer range for ungulates like deer and moose, and spring and summer habitats for grizzly and black bears. Bird species generally occurring in these habitats include fox sparrow, American robin, dusky grouse, rufous hummingbird and red-tailed hawk.

High elevation grasslands provide habitat for a variety of species in the Elk Valley. High elevation grasslands are an important component of overwintering habitat for bighorn sheep and an important component of whitebark pine habitat. The meadows and steep-sloped grasslands in the Project footprint provide summer forage for elk, bighorn sheep, mule deer, moose, black bear and grizzly bear. Columbian ground squirrel is a common small mammal in these habitats; American badger, which preys on this species, may also be present.

American dipper, spotted sandpiper and harlequin duck are known to use streams within the general vicinity of the Project. American dipper is a year-round resident, whereas spotted sandpiper and harlequin duck are summer migrants. Amphibians such as Columbia spotted frog, wood frog, western toad and long-toed salamander may also use riparian and wetland habitats in the general vicinity of the Project.

The local climate is characterized by relatively cool wet winters and dry warm summers, which plays a role in wildlife habitat use patterns in the area. Snowfall influences the habitat conditions and use by many animal species, particularly ungulates, during winter. Wind can reduce snow levels in winter, creating foraging opportunities that would not be possible in deep snow.

As with ecosystems and vegetation, anthropogenic and natural influences (e.g., forestry, coal mining, fire, pests, disease) have affected wildlife habitat and the presence and distribution of wildlife in the Elk Valley. Other development (e.g., agriculture, transmission lines, well sites, pipelines, railways, roads) and local communities in the region affect wildlife habitat availability, suitability and use in the Elk Valley. Hunting and other recreational activities also affect wildlife presence and distribution on the landscape, though to a lesser extent.

9.3.3 Fish and Fish Habitat

The Project is located in the upper Fording River area, which is defined as the section of the Fording River located upstream of Josephine Falls, which acts as a permanent barrier to upstream fish migration. Westslope Cutthroat Trout are the only known fish species to occur in the upper Fording River. The WCT is provincially blue-listed (i.e., of Special Concern) and is highly valued by local Indigenous Peoples. Fish habitat in the vicinity of the Project includes the mainstem of the upper Fording River between Clode Creek and Ewin Creek and a

[32] Scientific names for wildlife species mentioned in this document are listed in Appendix F.

number of tributaries including Clode Creek, Kilmarnock Creek, Chauncey Creek, and unnamed first- and second-order tributaries to these creeks and the upper Fording River.

The upper Fording River WCT population has been studied intensively from 2012 through the Upper Fording River WCT Population Monitoring Program (Westslope 2016; Poisson 2024). Supplementing this regional program, Project-specific fish and fish habitat existing conditions studies began in 2018 and are ongoing. The following key findings regarding the upper Fording River WCT population and the habitat supporting the population have been identified:

- The WCT in the upper Fording River are genetically pure, unlike many other WCT populations that are under threat due to hybridization with Rainbow Trout (Westslope 2016).
- Migratory and resident WCT life history variants occur in the upper Fording River, as confirmed by telemetry studies (Westslope 2016).
- Habitat availability for upper Fording River WCT has been estimated at approximately 57 km in the upper Fording River mainstem (including side channels) with an additional approximately 45 km of tributary habitat (Poisson 2024).
- Overwintering and tributary habitat (used for spawning, rearing and overwintering) were defined as limiting for WCT in the upper Fording River based on fish use and habitat availability (Westslope 2016). Spawning habitat was identified in both the tributaries and the mainstem, and high-density juvenile rearing habitat was identified in the tributaries of the Fording River. Overwintering habitat is particularly limiting in the upper Fording River watershed (EOC Team 2021). Three core WCT habitat areas have been identified in the upper Fording River mainstem:
    - 6.5 km of stream between Henretta Pit Lake and the multi-plate culvert (including Clode Flats)
    - 7 km of stream adjacent to Castle Mountain including the oxbow pools and groundwater reach, a side-channel to the Fording River and Chauncey Creek
    - 6.3 km of stream south of GHO including Greenhills Creek and Dry Creek
- The Chauncey Creek watershed provides spawning and rearing habitat to WCT, although cool water temperatures mean that successful recruitment may not occur in all years. The removal of a culvert barrier in 2020 made Chauncey Creek upstream of the Fording Mine Road accessible to Fording River WCT, although resident fish were historically present upstream of the barrier.
- Kilmarnock and Clode creeks were historically populated by WCT, but the majority of these creeks are now infilled or inaccessible. The historical resident population of WCT in upper Kilmarnock Creek has been extirpated.
- The upper Fording River WCT population experienced a decline representing a notable population viability and sustainability concern in 2018/2019. The decline was attributed to severe winter conditions combined with low summer flows and the ongoing effects of development in the upper Fording River (EOC Team 2021). The population has since rebounded and is approaching pre-decline levels (Poisson 2024). Year 2023 estimated populations showed improving trends, with estimated populations of approximately 8,000 adults and greater than 16,000 juveniles. These adult populations are at the highest levels since the study began in 2012.

Additional information about WCT habitat that may be affected by the Project is discussed in Section 9.3.5.7.

9.3.4 Species at Risk

The conservation status of species at risk in BC is determined at both the provincial and federal levels. Provincially, the BC MECCS posts conservation status information on the BC Species and Ecosystems Explorer for species and ecosystems in the province (BC MECCS 2024b). Data on known species at risk occurrences are publicly available through the BC Conservation Data Centre (BC CDC 2025), museums (University of British Columbia 2024) and online data compilers (Consortium of Pacific Northwest Herbaria 2024; Global Biodiversity Information Framework 2024). The BC CDC assigns a provincial list status (e.g., red, blue, yellow, exotic) to a species or ecosystem based on its conservation status within BC. Red-listed species or ecosystems are at risk of being lost (i.e., Extirpated, Endangered or Threatened) in BC. Blue-listed species or ecosystems are of Special Concern (formerly Vulnerable) in BC. Yellow-listed species or ecosystems are those that are at the least risk of being lost. Exotic-listed species have been moved beyond their natural range because of human activity.

Federally, species rankings are proposed by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC), which is established under Section 14 of the SARA. Under the COSEWIC system, a conservation status of Extinct, Extirpated, Endangered, Threatened, Special Concern, Data Deficient or Not at Risk is proposed for the competent Minister to consider. The competent Minister then choses what species and conservation status to include in Schedule 1 of SARA. Schedule 1 of SARA provides the official list of species at risk and their federal conservation status. The prohibitions of the act apply only to those species ranked as Endangered, Threatened or Extirpated.[33] The SARA typically applies only on federal land. On private or provincially owned lands, only aquatic species as defined by the federal *Fisheries Act* and migratory birds as defined by the federal *Migratory Birds Convention Act, 1994*, are protected under SARA. Critical habitat protection on non-federal lands is afforded only to aquatic species unless ordered by the Governor in Council if it is deemed that provincial or voluntary measures do not adequately protect a species.

Definitions of federal and provincial conservation status are provided in Table 9.3-1.

Table 9.3-1: Conservation Status Definitions

Agency	Status	Definition
COSEWIC (federal)[(a)]	Endangered	A species facing imminent extirpation (no longer exists in Canada) or extinction (no longer exists).
	Threatened	A species likely to become Endangered if limiting factors are not reversed.
	Special Concern	A species that is particularly sensitive to human activities or natural events but is not Endangered or Threatened.
BC CDC (provincial)[(b)]	Red	Any indigenous species, subspecies or plant community that is at risk of being lost (i.e., Extirpated, Endangered or Threatened or are candidates for designation) in BC
	Blue	Any indigenous species, subspecies or community considered to be of Special Concern in BC. Blue-listed elements are of Special Concern because of characteristics that make them particularly sensitive to human activities or natural events. They are not at risk of extirpation nor considered endangered.
	Yellow	Any indigenous species or subspecies that is apparently secure and at least risk of being lost.
	Exotic	Species that have been moved beyond their natural range as a result of human activity.

a) The conservation status on Schedule 1 of SARA can be different than that proposed by COSEWIC.

b) BC CDC 2024.

COSEWIC = Committee on the Status of Endangered Wildlife in Canada; BC CDC = British Columbia Conservation Data Centre

[33] The prohibitions of the *Species at Risk Act* apply to extirpated species only if there is a recovery strategy in place and these species are afforded protection of critical habitat as defined in the relevant recovery strategy.

9.3.4.1 Plants at Risk

A query of the BC CDC (2025) was conducted in March 2025 for federally/provincially listed plants at risk that have potential to occur in the Rocky Mountain Natural Resource District. The results were further refined using information on the biogeoclimatic zones/subzones that occur in the Project vicinity (i.e., Engelmann Spruce – Subalpine Fir dry cool, Montane Spruce dry cool, Montane Spruce dry warm and conservatively Interior Mountain-heather Alpine though it does not occur in the Project footprint) to identify species at risk that have the potential to be affected by the Project. Additionally, information on plant species at risk was compiled from the Consortium of North American Bryophyte Herbaria (2024), Global Biodiversity Information Framework (2024), iNaturalist (2024), and specimen label information (Consortium of North American Lichen Herbaria 2024; Consortium of Pacific Northwest Herbaria 2024; Royal BC Museum 2024; Mycology Collections Portal 2024; University of British Columbia 2024).

Thirty-four vascular, 25 non-vascular plants, and 4 lichen red- or blue-listed species were identified as having the potential to occur within the Project vicinity based on a review of the above data sources (Appendix G). Ten of these red- or blue-listed plant species have been documented within the Project footprint during field work completed in support of the Project (Table 9.3-2). Of the 10 provincially red- and blue-listed species occurring in the Project footprint, only whitebark pine is currently federally listed as Endangered under COSEWIC and Schedule 1 of SARA. There is an element occurrence record for Cusick's paintbrush from the Project footprint, but it is based on an erroneous iNaturalist record that has been withdrawn. As a result, there is no valid record for Cusick's paintbrush from the Project footprint, so it is not included in Table 9.3-2.

Table 9.3-2: Plant Species at Risk Documented within the Project Footprint

Common Name[a]	BC CDC[b]	COSEWIC	SARA[c]
Vascular plants			
Flathead larkspur	Blue	N/A	N/A
Sheep cinquefoil	Red	N/A	N/A
Rocky Mountain willowherb	Red	N/A	N/A
Whitebark pine	Blue	Endangered	Endangered
Wolf's trisetum	Blue	N/A	N/A
Non-vascular plants			
Cephaloziella liverwort	Blue	N/A	N/A
Forest brownwort	Blue	N/A	N/A
Desmatodon moss	Blue	N/A	N/A
Tri-tip leafy liverwort	Blue	N/A	N/A
Lichens			
Two-toned bone lichen	Blue	N/A	N/A

Sources: EVR VPro Master Database; WSP GAL BCO Vegetation Rare Plant BC CDC Database; WSP GAL BCO/PNO Vegetation Rare Plant Database; BC CDC (2025)

a) Refer to Appendix F for a list of scientific names.

b) Red is Extirpated, Endangered or Threatened; Blue is Special Concern (BC CDC 2025).

c) SARA Schedule 1.

BC CDC = British Columbia Conservation Data Centre; COSEWIC = Committee on the Status of Endangered Wildlife in Canada; N/A = not listed

9.3.4.2 Wildlife at Risk

A query of the BC CDC (2025) was completed in March 2025 for federally/provincially listed wildlife at risk that have potential to occur in the Rocky Mountain Natural Resource District. The results were further refined using information on the biogeoclimatic zones that occur within the Project vicinity. Previously collected data and external sources (e.g., British Columbia Breeding Bird Atlas [Davidson et al. 2015]) were also reviewed as well as extensive data collected for the Project from 2018 to 2024.

Seventy-seven red- or blue-listed wildlife species were identified as having the potential to occur within the Project vicinity, 26 of which are also federally listed under Schedule 1 of SARA or by COSEWIC (Appendix H). Ten additional species that are provincially yellow-listed (not at risk) or status unknown are federally listed under Schedule 1 of SARA or by COSEWIC (Appendix H). In total, the list includes 17 mammal species, 27 bird species, 4 amphibian species, 2 reptile species, 12 gastropod species and 23 insect species. Twenty-five wildlife species at risk have been documented within the Project vicinity (Table 9.3-3); nine of these species are also protected under the *Migratory Birds Convention Act, 1994*.

Table 9.3-3: Wildlife Species at Risk Documented within the Project Vicinity

Common Name[a]	BC CDC[b]	COSEWIC	SARA[c]
Mammals			
American badger	Red	Endangered	Endangered
Bighorn sheep	Blue	N/A	N/A
Eastern red bat	Unknown	Endangered	N/A
Grizzly bear	Blue	Special Concern	Special Concern
Hoary bat	Blue	Endangered	N/A
Little brown myotis	Blue	Endangered	Endangered
Mountain goat	Blue	N/A	N/A
Silver-haired bat	Yellow	Endangered	N/A
Birds			
American goshawk	Blue	Not at Risk	N/A
Bank swallow[d]	Yellow	Threatened	Threatened
Barn swallow[d]	Yellow	Special Concern	Threatened
Common nighthawk[d]	Blue	Special Concern	Special Concern
Connecticut warbler[d]	Blue	N/A	N/A
Great blue heron[d]	Blue	N/A	N/A
Killdeer[d]	Blue	N/A	N/A
Long-billed curlew[d]	Yellow	Special Concern	Special Concern
Olive-sided flycatcher[d]	Yellow	Special Concern	Special Concern
Prairie falcon	Red	Not at Risk	N/A
Red-necked phalarope[d]	Blue	Special Concern	N/A
Rough-legged hawk	Blue	Not at Risk	N/A
Amphibians			
Western toad	Yellow	Special Concern	Special Concern

Table 9.3-3: Wildlife Species at Risk Documented within the Project Vicinity

Common Name[a]	BC CDC[b]	COSEWIC	SARA[c]
Insects			
Bronze copper	Blue	N/A	N/A
Fernald's cuckoo bumble bee	Blue	N/A	N/A
Gillette's checkerspot	Blue	N/A	N/A
Western bumble bee	Yellow	Threatened	Threatened

Sources: Matrix 2014, 2015; Golder 2018; WSP, unpublished data

a) Refer to Appendix F for a list of scientific names.

b) Red is Extirpated, Endangered, or Threatened; Blue is Special Concern; Yellow is secure and low risk of being lost (BC CDC 2025).

c) SARA Schedule 1.

d) Species is also protected under the *Migratory Birds Convention Act, 1994*.

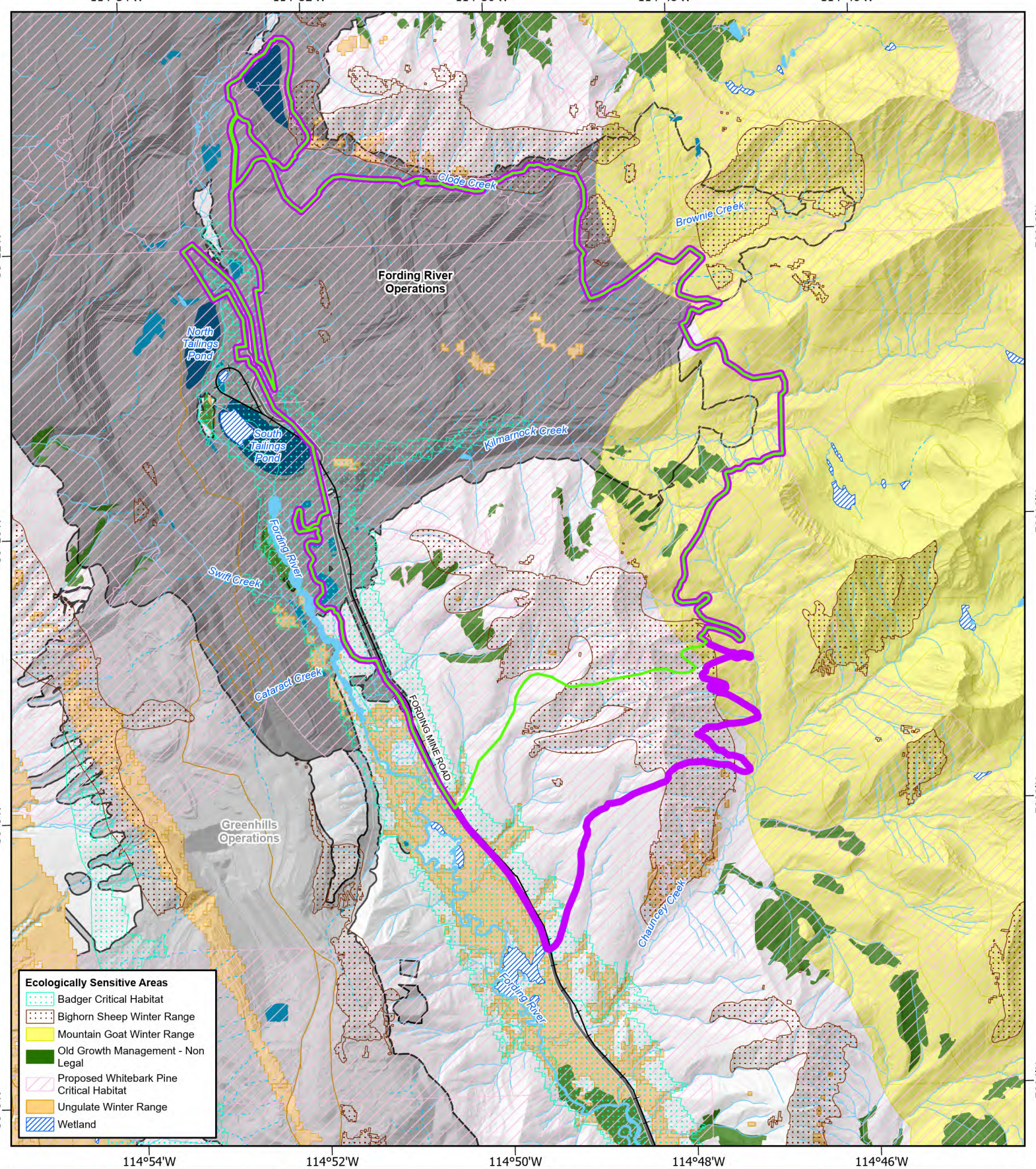
BC CDC = British Columbia Conservation Data Centre; COSEWIC = Committee on the Status of Endangered Wildlife in Canada; N/A = not listed

9.3.4.3 Fish at Risk

As noted in Section 9.3.3, WCT is the only fish species occurring in the Project vicinity due to a permanent fish barrier downstream on the Fording River (i.e., Josephine Falls). The species is designated as Special Concern by COSEWIC and listed as Special Concern under Schedule 1 of SARA. Additionally, this species is blue-listed in BC (Appendix H). Refer to Section 9.3.3 and Section 9.3.5.7 for more information related to WCT.

9.3.5 Ecologically Sensitive Areas

Several key ecologically sensitive and at-risk areas occur in the Project vicinity and are discussed below. Ecologically sensitive and at-risk areas mapped through publicly available sources are depicted in Figure 9.3-1 and Figure 9.3-2, respectively.



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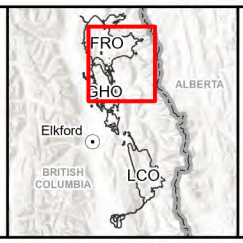


Figure 9.3-1: Ecologically Sensitive Areas in the Project Vicinity (NTS 082J/02)

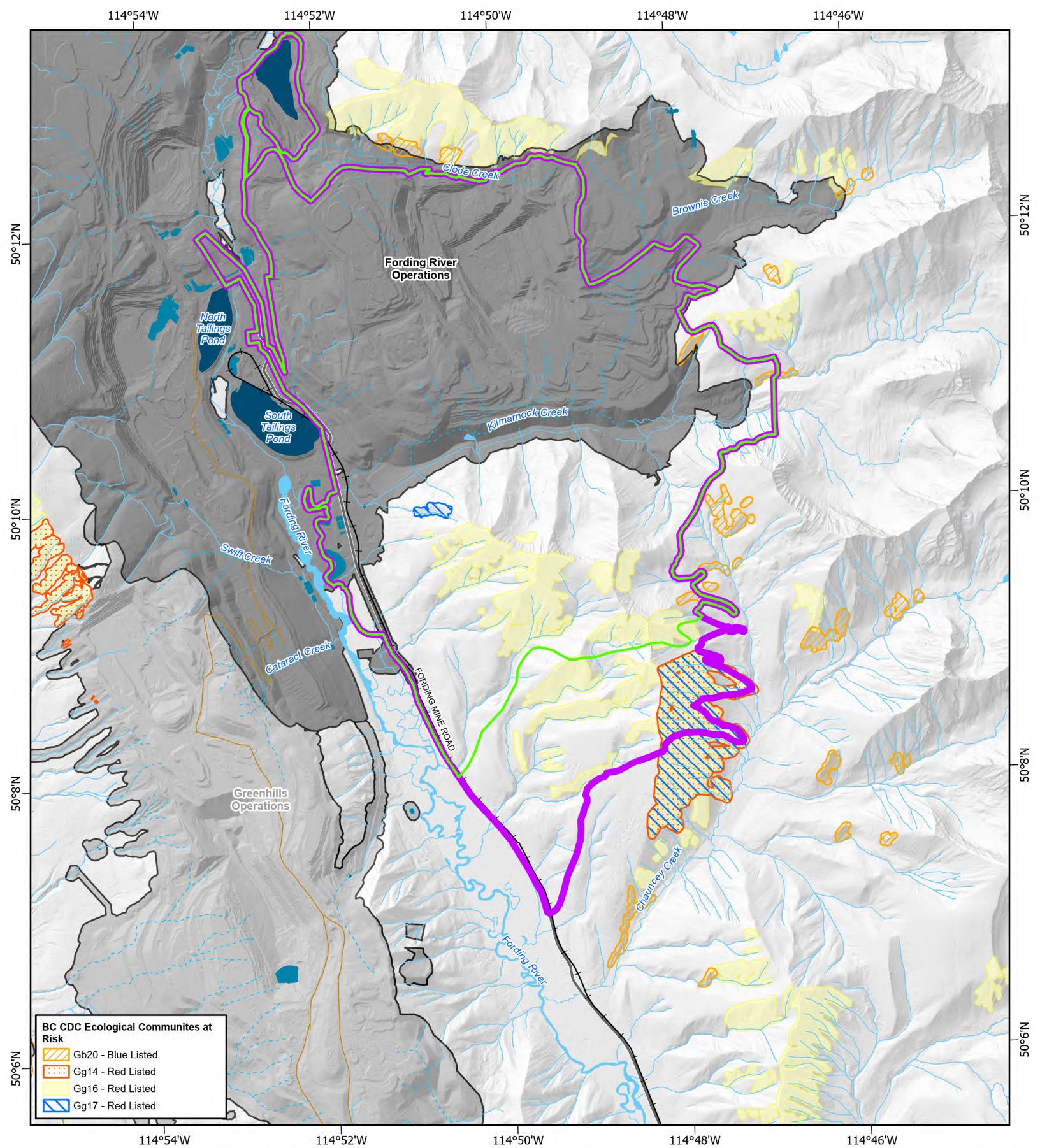
- Railway
- Road - Paved
- Road - Unpaved
- Surface Flow Watercourse
- Subsurface Flow Watercourse
- GHO C-137 Permitted Mine Area
- FRO C-3 Permitted Mine Area
- Project Footprint - Stage 1
- Project Footprint - Stage + Stage 2
- Tailings Pond
- Waste Water/Sediment Pond
- Waterbody

N

1 km

DATE: 4/30/2025	MINE OPERATION: FORDING RIVER
SCALE: 1:65,000	COORDINATE SYSTEM: NAD 1983 UTM Zone 11N

Document Path: I:\CLIENTS\EVR\2025\CA0050291_7055\Mapping\03_DPD\CA0050291_7055_DPD_017_GIS_EcologicallySensitiveAreasProjectVicinity.aprx



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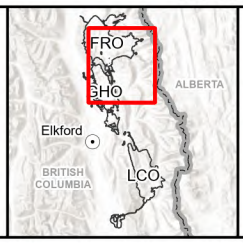


Figure 9.3-2: Ecological Communities at Risk in the Project Vicinity (NTS 082J/02)

- Railway
- Road - Paved
- Road - Unpaved
- Surface Flow Watercourse
- Subsurface Flow Watercourse
- FRO C-3 Permitted Mine Area
- GHO C-137 Permitted Mine Area
- Project Footprint - Stage 1
- Project Footprint - Stage 1 + Stage 2
- Tailings Pond
- Waste Water/Sediment Pond
- Waterbody

N

1 km

DATE: 4/30/2025	MINE OPERATION: FORDING RIVER
SCALE: 1:65,000	COORDINATE SYSTEM: NAD 1983 UTM Zone 11N

Document Path: I:\CLIENTS\EVR\2025\CA0050291_7055\Mapping\03_DPD\CA0050291_7055_DPD_020_GIS_ECAR_BCCDC_ProjectVicinity.aprx

9.3.5.1 Grassland and Brushland Ecosystems

Grassland and brushland ecosystems occur in the Project footprint and on adjacent mountains, typically at higher elevations towards mountain peaks and ridges. Grassland and brushland ecosystems typically occur on steep, warm aspects in the Elk Valley and are more common at higher elevations (MacKillop et al. 2018). Grassland and brushlands may develop where conditions are too dry for forest establishment (MacKillop et al. 2018). Brushlands differ from grasslands in that woody shrubs such as juniper and Saskatoon are prominent. Several of the grassland ecosystems are unique to the East Kootenay Region. High elevation grasslands provide habitat diversity and important forage for grazing ungulates including provincially listed bighorn sheep. Other wildlife species at risk use or may use these ecosystems, including American badger and prairie falcon, as do several plant species at risk, including some of those described in Section 9.3.4.1 (e.g., Wolf's trisetum).

In the Elk Valley, grasslands and brushlands are under threat from mining, exploration roads, off-road vehicle use and loss of natural and historical fire patterns. Fire exclusion has allowed tree and shrub encroachment to occur resulting in broad-scale shifts from grasslands to forested ecosystems (MacKillop et al. 2018). As a result of these threats, and combined with the limited distribution, several grassland and brushland ecosystems have been designated provincially at risk as described in Section 9.3.5.4. Refer to Table 9.1-1 for a summary of recent efforts and initiatives related to grasslands and brushland ecosystems.

9.3.5.2 Wetland and Flood Plain Ecosystems

Several wetland and flood plain ecosystems occur in the vicinity of the Project along the Fording River, Kilmarnock Creek and Chauncey Creek. Wetlands are biologically diverse habitats, and the ecological functions provided by wetlands to maintain terrestrial and freshwater biodiversity is disproportionate to their size and the area that they occupy on the landscape. In the Elk Valley, wetlands provide habitat used by many species at some point in their life cycle, and many of BC's species of conservation concern depend on wetlands. In the Elk Valley, wetlands are relatively uncommon and may have undergone substantial conversion due to agriculture, rural development, mining and other development activities.

Flood plain ecosystems are part of the larger riparian areas of streams, rivers and some wetland complexes (MacKillop et al. 2018). Flood plain ecosystems provide important habitat for fish and wildlife species, act as sediment traps and prevent erosion of stream banks. Throughout much of BC, flood plain ecosystems have been affected by human developments. Within the Elk Valley, flood plain ecosystems have been impacted predominantly by urban and rural development, agriculture, clearing for range lands and transportation corridors.

Select wetland and flood plain ecosystems are also considered ecological communities at risk, as described in Section 9.3.5.4. Wetlands available from the Freshwater Atlas of BC (Integrated Land Management Bureau 2024) are depicted in Figure 9.3-1.

9.3.5.3 Old and Mature Forests

Old and mature forests occur in the Project footprint. Old forests are stands greater than or equal to 250 years old, except in subzones that experience stand-initiating disturbance; in these subzones, old forests are stands greater than or equal to 140 years old (BC MoF and MELP 1995; Forest Practices Board 2002). Old forests take a long time to develop and provide complex structure that support wildlife and plant species. Mature forests provide important values associated with old forest ecosystems and are recruitment sites for old forests. Mature

forest in the vicinity of the Project is defined as forested areas greater than 100 years old or greater than 120 years old depending on the frequency of disturbance in the ecosystem (BC MoF and MELP 1995; Forest Practices Board 2002).

Old and mature forests are recognized for their contribution to biodiversity values and ecological function not found in younger stands, including providing important habitat for animals and genetic diversity to nearby tree stands. Old and mature forests also provide several additional functions, including carbon sequestration and microhabitat creation. Species diversity and structural characteristics of old forests (e.g., large living and dead trees, large gaps) develop slowly and are difficult to replace once lost. Old and mature forests have been affected by the forestry industry, agriculture and mining in the Elk Valley.

The EV-CEMF reported that the amount of old forest is below historical levels throughout most of the Elk Valley (Holmes et al. 2018). Specifically, select subzones and variants in the Montane Spruce and Engelman Spruce – Subalpine Fir zones are in a high old growth deficit and would not meet legal targets for old growth as described in the Kootenay-Boundary Higher Level Plan Order (Forest Practices Board 2002), nor are they in the expected range of natural variation (i.e., the amount of old forest that existed historically in the Elk Valley under natural disturbance regimes). The amount of mature forest was also below historical levels, although not to the same degree as old forest. However, mature stands are important as they serve as recruitment stands in areas where there is not enough old forest to meet objectives.

Old growth management areas (OGMAs) in BC are defined areas that are specially managed for old forest values and can be legally or non-legally established. Notably, the recent provincial Old Growth Strategy Review (Gorley and Merkel 2020) listed several concerns regarding OGMAs including that there have been no substantial monitoring or updates of these areas since implementation in 1995 and that many OGMAs do not actually contain old forest. The assessment of the Project will rely on field-verified terrestrial ecosystem mapping to define areas of old and mature forests rather than the OGMAs. The OGMAs are depicted in Figure 9.3-1 for information purposes.

9.3.5.4 Ecological Communities at Risk

Several ecological communities at risk are known to occur in the Project vicinity (BC CDC 2024):

- rough fescue – (bluebunch wheatgrass) – yarrow – clad lichens (Gg10/Gg12), a red-listed grassland in BC
- Idaho fescue – sulphur buckwheat – thread-leaved sandwort (Gg14), a red-listed grassland in BC
- rough fescue – sulphur buckwheat – thread-leaved sandwort (Gg16), a red-listed grassland in BC
- Idaho fescue – bluebunch wheatgrass – sulphur buckwheat – thread-leaved sandwort (Gg17), a red-listed grassland in BC
- Saskatoon – soopolallie – common juniper (Gb20), a blue-listed brushland in BC
- timber oatgrass – grouseberry – thread-leaved sandwort – compact selaginella (Ag01), a red-listed alpine grassland in BC
- Idaho fescue – sulphur buckwheat – thread-leaved sandwort (Vh12), a red-listed avalanche ecosystem in BC
- Bebb’s willow - bluejoint reedgrass (Ws03), a blue-listed wetland in BC
- hybrid white spruce – horsetail – leafy moss (Ws07), a blue-listed wetland in BC

- mountain alder/common horsetail (Fl01), a blue-listed flood ecosystem in BC
- Drummond's willow - bluejoint reedgrass (Fl05), a blue-listed flood ecosystem in BC
- black cottonwood – hybrid white spruce/red-osier dogwood (Fm02), a blue-listed flood ecosystem in BC

Of these ecological communities at risk, all have been mapped in the Project vicinity and four (Gg14, Gg16, Gg17 and Gb20) have been previously documented in the Project footprint and vicinity by BC CDC (2024) as depicted in Figure 9.3-2. Several of these ecological communities at risk, specifically some of the grassland and brushland communities (i.e., Gg14, Gg16, Gg17 and Gb20), have currently been documented only in the East Kootenay region, and are of conservation concern due to their current known distribution and potential sensitivity to development. Further, ecological communities at risk provide important habitat diversity, significant habitat for wildlife and frequently provide habitat for at-risk species and species of concern (MacKillop et al. 2018). Detailed mapping and assessment of ecologically sensitive areas will be presented in the IS/A.

9.3.5.5 Critical Habitat

Whitebark Pine

Whitebark pine is a shade-intolerant coniferous tree species that prefers open habitats (such as grasslands, forb-dominated ecosystems and open forests) in subalpine and alpine climates (Keane and Parsons 2010; Klinkenberg 2014), though this species also occurs in a variety of forested habitats (ECCC 2017). In the Elk Valley, whitebark pine habitat consists primarily of high-elevation areas that are sparsely vegetated and rocky (Teck 2016a).

Whitebark pine is listed as federally endangered under SARA and is under stress due to four main threats: white pine blister rust, climate change, mountain pine beetle infestation and fire suppression (ECCC 2017). These factors also interact and can compound impacts. White pine blister rust is currently considered the greatest threat but with a rapidly changing climate, including increased frequency of severe weather events and catastrophic wildfires, there is increasing concern that suitable climate envelopes for this species will shift (ECCC 2017). Whitebark pine is slow to establish and reach reproductive maturity, and these characteristics may make it difficult for it to adapt to these new conditions.

Improving mapping and inventory of whitebark pine, identifying the extent of white pine blister rust infection across the range, and identifying rust-resistant whitebark pine trees and cone-producing trees is considered essential for supporting the recovery of whitebark pine (ECCC 2017). EVR has a Whitebark Pine Species Management Plan (Teck 2016a) that has been implemented to mitigate potential adverse effects on whitebark pine at operations in the Elk Valley.

Proposed whitebark pine critical habitat (ECCC 2017) can only be partially circumscribed at the landscape scale because of residual uncertainty regarding the species' distribution, projected effects due to climate change, and the quality and quantity of habitat needed to sustain long-term persistence and genetic diversity. The proposed whitebark pine recovery strategy (ECCC 2017) has taken the precautionary approach of identifying critical habitat as all areas that have a high-density of cone-producing whitebark pine trees that are not terminally infected with white pine blister rust. Proposed critical habitat for whitebark pine is mapped in the Project footprint and vicinity (Figure 9.3-1).

American Badger

The *jeffersonii* subspecies of the American badger that occurs in BC is federally endangered under SARA on the basis of low population resilience due to very small population sizes. The eastern population is estimated at 100 to 160 individuals (ECCC 2023b).

American badgers occur in a variety of open habitats ranging from hot, dry grassland valley bottom to alpine tundra; however, they generally prefer fields, grasslands and open-canopied forests (Apps et al. 2002; Hoodicoff and Packham 2006; Kinley 2009). Habitat use by badgers is primarily related to soil characteristics and prey availability (British Columbia Badger Recovery Team 2016; ECCC 2023b). Habitats free of anthropogenic barriers (e.g., roads) are required for movement and dispersal.

The federal recovery strategy for American badger (ECCC 2023b) maps critical habitat for the species, which occurs in the Project footprint and vicinity (Figure 9.3-1). Critical habitat is subdivided into two types: core critical habitat necessary to support feeding/foraging and denning functions, and safe movement habitat necessary to access dispersed and temporally/spatially dynamic foraging, denning and mating opportunities.

9.3.5.6 Ungulate Winter Range

Bighorn sheep winter range was mapped using information provided by the EV-CEMF (Bighorn Sheep Expert Team 2020). Winter range typically consists of relatively high-quality forage on warmer aspects where snow is removed by wind and solar radiation and where escape terrain occurs nearby. Bighorn sheep use a variety of high-elevation habitats as winter range including grasslands, alpine meadow, alpine tundra, rock outcrops and reclaimed mines. Winter range in the Elk Valley is considered the most critical factor limiting bighorn sheep populations because they are not adapted to forage and travel in deep snow. Annual range for bighorn sheep is extensive and is not considered to be limiting in the Elk Valley (Bighorn Sheep Expert Team 2020).

Unlike bighorn sheep, deer, elk and moose winter lower in the valleys, though elk may occur less frequently at higher elevations in winter. Mountain goat winter range occurs mostly to the east of the Project area where rugged mountainous terrain preferred by this species is available. Formal legal establishment of ungulate winter range and associated objectives is undertaken by the BC MoF under the *Forest and Range Practices Act* (SBC 2002, c 69). Mapped ungulate winter range is available from the province (Government of British Columbia 2024). Ungulate winter range is depicted in Figure 9.3-1 for information purposes.

9.3.5.7 Westslope Cutthroat Trout Habitat

Limiting habitat for WCT in the upper Fording River consists of mainstem overwintering habitat and tributary habitat (used for spawning, rearing and overwintering); these habitats were found to be limited in the upper Fording River based on the scale of historical habitat loss and lost connectivity (Westslope 2016). The Project has the potential to impact two of three areas within the mainstem upper Fording River:

- The 6.5 km of stream channel between Henretta Pit Lake and the multi-plate culvert including the Clode Flats, lower Henretta Creek, Henretta Pit Lake, Fish Pond Creek and remnant tributary outflows (note that of this core area, only the portion downstream of Clode Creek may be affected by the Project).
- The 7.0 km of stream channel adjacent to Castle Mountain including the oxbow pools and groundwater influenced side-channel to the Fording River and Chauncey Creek.

Chauncey Creek represents one of only two intact tributary systems within the upper Fording River watershed. Upstream tributaries that historically provided important WCT habitat (e.g., Kilmarnock Creek, Clode Creek) have been heavily affected by mining such that very limited habitat remains accessible.

Refer to Section 9.1.3 for discussion of recent WCT survey results and Table 9.1-1 for a summary of efforts related to WCT.

9.4 Human Environment

This section of the Revised DPD outlines human environment conditions, including social and economic conditions, health and well-being and archaeological resources for potentially affected Indigenous Peoples and local communities in the vicinity of the Project[34].

9.4.1 Social and Economic Conditions

9.4.1.1 Indigenous Peoples of Canada

Ktunaxa Nation

As identified in Section 7.1.1, the KNC is the governing body of the Ktunaxa Nation, which includes the Ktunaxa communities of Yaq̓it ʔa·knuqƛi ’it (Tobacco Plains Band), ʔaq’am (St. Mary’s Band), yagan Nuʔkiy (Lower Kootenay Band), and ʔakisq’nuk First Nation (Columbia Lake Band). These First Nations, and the interests of all Ktunaxa citizens in Canada, are represented by the KNC. The Ktunaxa People are represented through their individual member Nations in Canada, including: Yaq̓it ʔa·knuqƛi ’it (Tobacco Plains Band), ʔaq’am (St. Mary’s Band), yaqan nuʔkiy (Lower Kootenay Band) and ʔakisqnuk First Nation (Columbia Lake Band) as well as KNC.

There are approximately 1,500 Ktunaxa Nation citizens (status and non-status) in Canada (KNC 2016). A breakdown of population and labour force characteristics by Ktunaxa Nation community is provided in Table 9.4-1.

[34] Where percentages are reported in this section of the Revised DPD they are typically rounded to the nearest whole percentage.

Table 9.4-1: Population, Age and Labour Force Characteristics

Ktunaxa Nation Community	Total Registered On- and Off-Reserve Population[a]	Gender[a]		Total Registered On-Reserve Population[a]	Median Age[b]	Total Population 15 years and Over[b]	Total Population 15 Years and over Participating in Labour Force[b]	Unemployment Rate[b,c] (%)
		Male	Female					
Yaq̓it ʔa·knuqƛi ʾit (Tobacco Plains Band)	285	147	138	91	38.4	70	40	25.0
ʔaqʾam (St. Mary's Band)	411	193	218	204	33.6	105	70	14.3
yagan nuʔkiy (Lower Kootenay Band)	255	121	134	122	38.8	70	40	25.0
ʔakisqʾnuk First Nation (Columbia Lake Band)	586	295	291	140	39.6	80	40	25.0

Note: Median annual individual income and family income data were not available for these four communities due to area and data suppression.

a) CIRNAC 2025a. Total registered population living on- and off-reserve. On-reserve population includes those living on a reserve other than that of their community.

b) (Statistics Canada 2023a).

c) The unemployment rate represents the number of individuals who are participating in the labour force (i.e., looking for work) but are not currently employed.

As of June 2025, the Yaq̓it ʔa·knuqƛi ’it (Tobacco Plains Band) had a registered population of 285 people, of which 91 people reportedly live on reserves (CIRNAC 2025a). As of 2021, within the Yaq̓it ʔa·knuqƛi ’it (Tobacco Plains Band), 57% of the working-age Indigenous population (40 people) participated in the labour force. The unemployment rate of the Indigenous population was reported to be 25%. As of June 2025, ʔaq’am reported a registered population of 411 people, of which 204 people reportedly live on reserves (CIRNAC 2025a). Within ʔaq’am, 67% of the working-age Indigenous population (70 people) participated in the labour force, with a reported unemployment rate of 14%. As of June 2025, yagan nuʔkiy (Lower Kootenay Band) reported a registered population of 255 people, of which 122 people reportedly live on reserves (CIRNAC 2025a). Within the yagan nuʔkiy (Lower Kootenay Band), 57% of the working-age Indigenous population (40 people) participated in the labour force, with an unemployment rate of 25%. As of June 2025, ʔakisq’nuk First Nation (Columbia Lake Band) reported a registered population of 586 people, of which 140 people reportedly live on reserves (CIRNAC 2025a). Within the ʔakisq’nuk First Nation (Columbia Lake Band), 50% of the working-age Indigenous population (40 people) participated in the labour force, with an unemployment rate of 25%.

As of 2021, collectively within the four communities, approximately 40% of the Indigenous population aged 15 years and over had achieved a high school diploma or equivalent as their highest level of education (Statistics Canada 2023a). Approximately 11% had also achieved an apprenticeship or trade certification, and 37% had an apprenticeship or college diploma or university degree (Statistics Canada 2023a). A higher percentage of the Indigenous male population had a high school diploma or equivalent as their highest level of education (40% and 37%, respectively).

The Ktunaxa Nation has articulated the following vision for its future, incorporating community health, language and culture, economic sustainability, and self-government of lands and resources:

> *As a Nation we are striving to achieve strong, healthy citizens and communities, speaking our languages and celebrating who we are and our history in our ancestral homelands, working together, managing our lands and resources, as a self-sufficient, self-governing Nation.* (Ktunaxa Nation AGA 2000)

The KNC is governed by the Ktunaxa Nation Executive Council. It organizes its programs according to five pillars of nation rebuilding:

- Lands and Resources
- Traditional Knowledge and Language
- Social Investment
- Education and Employment
- Economic Investment

The KNC exercises governance, sets policy and conducts planning to benefit Ktunaxa Nation citizens and uphold its stewardship responsibility to the land and resources in ʔamakʔis Ktunaxa. The KNC has indicated that these three functions are essential to the Ktunaxa Nation’s autonomy and to its ability to protect the title, rights and interests of its citizens and, as such, are considered fundamental to Ktunaxa title and rights. Ktunaxa Nation policies, standards and accepted practices (collectively referred to as policies) are intended to guide and assist the Ktunaxa Nation in exercising stewardship and management responsibilities for lands and resources in ʔamakʔis Ktunaxa.

Shuswap Band

As of March 2025, the Shuswap Band had a registered population of 312, of which 79 live on Shuswap Band reserves (CIRNAC 2025b). A further 30 people live on other reserve or Crown land, while the remaining 203 live off-reserve. The population breakdown reflects a larger female population in comparison to the male population (166 female to 146 males in March 2025). The Band's largest reserve is located near the Columbia River immediately north of Invermere. The Band is governed by a chief and council and is supported by council administration. Currently, the council is made up of the Chief and two elected councillors.

Based on data reported by Statistics Canada (2023b) for the Shuswap reserve located near the Columbia River immediately north of Invermere, the median age of the Indigenous population was reported to be 40.8 years. The total population aged 15 and over for Shuswap Band IR Census subdivision is 280, however only 75 of those aged 15 and over self-identify as Indigenous Peoples. Of the Indigenous population aged 15 and over (75 people), 53% had achieved a high school diploma or equivalent. Around 13% had an apprenticeship or trade, and 33% had a college diploma or apprenticeship or university degree. A higher percentage of the Indigenous female population reported having a high school diploma or equivalency certification compared to the Indigenous male population (56% and 50%, respectively).

Approximately 60% of the Indigenous population (45 people) at the Shuswap reserve participated in the labour force, with an unemployment rate of 22%. The median annual individual income for the Indigenous population was reported to be $39,600 in 2020. The average annual individual income for the Indigenous population was reported to be $37,000 in 2020 (Statistics Canada 2023b).

Métis Nation British Columbia

The Métis Nation British Columbia was established in 1996 as the representative organization for Métis in BC. The Métis Nation British Columbia represents 39 Métis Chartered Communities[35] in BC and has a mandate to develop and enhance opportunities for the Métis by implementing culturally relevant social and economic programs and services. The Métis Nation British Columbia is governed by an 11-person cabinet consisting of a president, vice-president, seven elected regional directors, and provincially elected representatives for both the Métis women and Métis youth of BC (Métis Nation British Columbia 2020b). The Métis Nation British Columbia Ministry of Natural Resources oversees initiatives related to natural resources, land and Métis traditional knowledge across all Métis Nation British Columbia departments and ministries. The Employment and Training Ministry delivers programs and services to improve the employment potential, earning capacity and self-sufficiency of Métis, while the Ministry of Economic Development and Partnerships implements programs aimed at economic prosperity (Métis Nation British Columbia 2020c).

The Elk Valley Métis Nation represents the Métis in Elkford, Fernie, Sparwood and surrounding regions and is a subgroup of the Métis Nation of British Columbia. The Elk Valley Métis Nation is a provincially registered non-profit Society that was established in 1994. The Elk Valley Métis Nation requires direct communication protocols for any business or rights activities pertaining to the citizens in the Elk Valley (Elk Valley Métis Nation n.d.). Their governance is focused on building and establishing business, proponent and government-to-government relationships.

[35] A Chartered Community is a Métis community that meets criteria set by the Métis Nation British Columbia, with only one Métis Chartered community in a geographic location; it has no less than 25 Métis citizens who are 18 years of age or older, and its bylaws (and constitution where applicable) are consistent with the Métis Nation British Columbia Constitution.

The Métis Nation British Columbia and the provincial government signed a Métis Nation Relationship Accord in 2006 and re-signed it in 2016. The Accord sets out objectives to address health (community, family and individual), housing, education, economic development (including Crown corporation procurement), information sharing, justice, Métis identification and data collection (e.g., population statistics), and wildlife stewardship (Government of British Columbia 2016). The 97,860 Métis of British Columbia reside throughout the province, and do not have formal Settlements as is the case in Alberta (in 2021).

Collectively, Métis in BC had median age of 33.6 years in 2021. Of the population aged 15 and over (75,745 people), 34% had a high school diploma or equivalent as their highest level of education,10% had an apprenticeship or trade, while 34% had a college diploma or university degree. Over two thirds (68% or 51,195 people) of the working-aged population participated in the labour force, with an unemployment rate of 11%. The median annual individual income was approximately $39,200 and the average annual individual income was approximately $49,040.

Stoney Nakoda Nations

The Stoney Nakoda Nations are comprised of the Bearspaw, Chiniki and Goodstoney First Nations and are represented by the Stoney Tribal Administration and located in western Alberta near the Rocky Mountains. The Stoney Nakoda Nations have four reserve communities (Big Horn 144A, Eden Valley 216, Stoney 142-143-144 and Stoney 142A); Eden Valley 216 is located approximately 40 km northeast of the Project. The settlement of Morley is located within Stoney 142-143-144 and represents the largest reserve lands of the Nation. Each member Nation is led by a Chief and four Councillors (Government of Alberta 2020b). A notable Nation business is the Stoney Nakoda Resort and Casino.

As of March 2025, the Stoney Nakoda Nations have a registered population of 5,677 people, of which 4,972 people were living on Stoney reserves. A further 16,557 people were reported as living on other reserve or Crown land, while the remaining 548 people were reported as living off-reserve (CIRNAC 2025c). In 2016, the resident populations on Big Horn 144A, Eden Valley 216 and Stoney 142-143-144 were 235, 595 and 3,700 people, respectively (Statistics Canada 2018); no population was reported for Stoney 142A. The on-reserve population had a median age of around 21 years. Of the population aged 15 and over (2,920 people), approximately 15% had a high school diploma or equivalent as their highest level of education. A further 7% had an apprenticeship or trade, while 12% had a college diploma or university degree. Just under half of the working-aged population (1,335 people) was participating in the labour force, with an unemployment rate of 37%. The median annual individual income for the Big Horn 144A reserve is supressed by Statistics Canada for confidentiality reasons. On the Eden Valley 216 and Stoney 142-143-144 reserves, the median annual individual income was around $8,000 and $15,000, respectively, while the median economic family income was about $37,000 and $42,500, respectively (Statistics Canada 2018). More recent population and labour force data on the reserve populations were not available as the data were suppressed to meet the confidentiality requirements of the *Statistics Act* (RSC 1985, c S-19).

Piikani Nation

The Piikani Nation is associated with the Blackfoot Confederacy in southwestern Alberta near the Town of Pincher Creek. The Nation has two reserve communities, Piikani 147 and Piegan Timber Limit 147B, of which Piikani 147 is the largest. The Nation is led by a Chief and eight Councillors (Government of Alberta 2020b). The Piikani Investment Corporation is responsible for developing and/or approving business plans for Piikani business entities at Chief and Council’s request as well as preparing and approving any loan agreement or

related documents with Piikani business entities or loan guarantee agreements with third-party institutions (Piikani Investment Corporation 2024). Piikani Resource Development Ltd. is responsible for the development of Piikani Nation's economic opportunities and has various initiatives and partnerships that generate resources and energy for Piikani Nation (Piikani Resource Development Ltd. 2020a). Piikani Resource Development Ltd. supports initiatives and individuals pursuing small business opportunities and manages a number of Piikani businesses and economic endeavours. These include the Piikani Oldman Hydro Limited Partnership, Piikani Link LP, Weather Dancer, sand and gravel, and solar energy investments (Piikani Resource Development Ltd. 2020b).

As of June 2025, the Piikani Nation had a registered population of 3,910, of which 2,382 live on Piikani reserves. A further 39 people were reported as living on other reserve or Crown land, while the remaining 1,489 people were reported as living off-reserve (CIRNAC 2025d). The 2021 census reported an official resident population on Piikani 147 of 1,550 people; no population was reported in Piegan Timber Limit 147B (Statistics Canada 2023a). The median age of the Indigenous population was approximately 32.4 years. Of the Indigenous population aged 15 and over (1,165), 26% had a high school diploma or equivalent as their highest level of education, and 7% had an apprenticeship or trades certification or diploma. The participation rate of the Indigenous population was approximately 39% (450 people), with an unemployment rate of 16%. The median annual individual income for the Indigenous population was reported to be $23,000 in 2021 (Statistics Canada 2023b).

Siksika Nation

The Siksika Nation is located in southcentral Alberta to the east of Calgary. The Nation has a single, large reserve, Siksika 146, which includes the Community of Barstow. The Town of Gleichen is located immediately adjacent to the reserve lands. The Nation is led by a Chief and 12 Councillors (Government of Alberta 2020b). The Siksika Nation administers local health and wellness facilities, schools and social programs, and is home to the Nation Sportsplex, Old Sun Community College and the Blackfoot Crossing Historical Park (Indian Business Corporation 2016). Siksika Resource Development GP Ltd. was established in 1997 as the economic and investment arm of the Siksika Nation. Siksika Resource Development GP Ltd. has a number of subsidiary businesses providing services in the areas of agricultural products, commercial real estate, retail, construction, dining and hospitality, and economic and resource development (SRDL 2020).

As of April 2025, the Siksika Nation had a registered population of 8,004 people, of which 4,333 people were living on Siksika reserve. A further 230 people were reported as living on other reserves or Crown land, while the remaining 3,441 people were reported as living off-reserve (CIRNAC 2025e). The 2021 census reported an official resident population on Siksika 146 of 3,560 people, with 3,550 reporting an Indigenous identity (Statistics Canada 2023a). The median age of the on-reserve Indigenous population was 27.8 years. Of the Indigenous population aged 15 and over (2,540 people), 35% had a high school diploma or equivalent as their highest level of education. A further 6% had an apprenticeship or trade, while 29% had a post-secondary certificate, diploma or degree. Approximately 51% of the working-age population (1,300 people) was participating in the labour force, with an unemployment rate of 35%. The median annual individual income reported for the Indigenous population in 2020 was $24,000 (Statistics Canada 2023b).

Kainai (Blood Tribe)

The Kainai (Blood Tribe) is located in southwestern Alberta, extending southwest from the City of Lethbridge's limits towards the Alberta–US border to the limits of the Town of Cardston. Kainai (Blood Tribe) has two reserve

communities, Blood 148, which is the largest, and Blood 148A. The Community of Stand Off is located on the reserve and is associated with much of Kainai (Blood Tribe) infrastructure and administration. The Kainai (Blood Tribe) is led by a Chief and 12 Councillors (Government of Alberta 2020b). Blood Tribe Economic Development is the economic development arm of the Kainai (Blood Tribe) and is focused on business and corporate development. The Blood Tribe Agricultural Project is a Kainai (Blood Tribe) business entity and has been in operation since 1991. The Blood Tribe Agricultural Project is tasked with operating and maintaining the irrigation system and monitoring and maintaining the conditions of the lands entrusted to the project. Another notable business is Kainai Forage. Established in 1997, Kainai Forage grows and processes hay and alfalfa on reserve for international distribution.

As of April 2025, the Kainai (Blood Tribe) had a registered population of 13,017 people, of which 8,691 people reportedly lived on Kainai reserves. A further 231 people were reported as living on other reserves or Crown land, while the remaining 4,095 people were reported as living off-reserve (CIRNAC 2025f). The 2021 census reported an official resident population on Blood 148 of 4,572 people and supresses data on Blood 148A due to quality or confidentiality concerns (Statistics Canada 2023b).

Per data reported by Statistics Canada's 2021 census, the median age of the Indigenous population for the Kainai Nation was 30.2 years. Of the Indigenous population aged 15 and over (3,235 people), 30% had a high school diploma or equivalent as their highest level of education. A further 5% had an apprenticeship or trade or diploma, while 35% had a post-secondary certificate, diploma or degree. Approximately 41% of the working age Indigenous population (1,320 people) was participating in the labour force, with an unemployment rate of 23%. The median annual individual income reported for the Indigenous population in 2020 was $24,40 (Statistics Canada 2023b).

Tsuut'ina Nation

The Tsuut'ina Nation's reserve Community of Sarcee 145 is located in Alberta southeast of the City of Calgary. As of April 2025, the Tsuut'ina Nation had a registered population of 2,702 people, of which 2,260 people reportedly lived on the Sarcee reserve. A further 151 people were reported as living on other reserves or Crown land, while the remaining 291 people were reported as living off-reserve (CIRNAC 2025g). The 2016 census reported an official resident population on Sarcee 145 of 1,640 people (Statistics Canada 2018); census data for 2021 were not available. The on-reserve population had a median age of 33.8 years. Of the population aged 15 and over (1,160 people), 27% had a high school diploma or equivalent as their highest level of education. A further 10% had an apprenticeship or trade, while 45% had a college diploma or university degree. Over two thirds of the working-aged population (69% or 800 people) were participating in the labour force, with an unemployment rate of 8%. The median annual individual income for the Sarcee 145 reserve was around $37,000, while the median economic family income was about $128,000 (Statistics Canada 2018). More recent population and labour force data on the reserve populations were not available as the data were suppressed to meet the confidentiality requirements of the *Statistics Act*.

Tsuut'ina Nation is led by a Chief and 12 Councillors (Government of Alberta 2020a). The Tsuut'ina have a number of businesses including trades, wood products, arts and crafts, cleaning and hospitality services, catering, security and transportation. The Redwood Meadows Golf and Country Club, Sarcee Gravel Products, and Tsuut'ina Gas Stop are prominent Nation businesses. The Nation maintains an income support department, off-reserve residency services and a healthcare centre. Fire, rescue and policing services are also provided on-

reserve to membership (Tsuut'ina Nation Fire and Rescue Service 2023; Tosguna Tsuut'ina Nation Police Service 2023).

Otipemisiwak Métis Government

The Otipemisiwak Métis Government (previously the Métis Nation of Alberta) was formed in 1928 to implement a mandate that pursues the advancement of the socio-economic and cultural well-being of the Métis people of Alberta (Otipemisiwak Métis Government 2024b). The Otipemisiwak Métis Government is divided into 22 administrative districts that fall under five territories. The Otipemisiwak Métis Government is governed by a president, women's representative, youth representative and 22 district representatives (Otipemisiwak Métis Government 2024a).

More than 127,000 Métis of Alberta reside throughout the province, including in the following Métis settlements (Statistics Canada 2023b):

- Buffalo Lake (population 379)
- East Prairie (population 310)
- Elizabeth (population 594)
- Fishing Lake (population 414)
- Gift Lake part A (population 625)
- Kikino part A (population 978)
- Paddle Prairie (population 551)
- Peavine (population 387)

Southern Alberta is part of District 1 Foothills Métis District, which has a population of 1,889 people.

Collectively, the Otipemisiwak Métis Government had a median age of 30.8 years in 2021. Of the population aged 15 and over (96,230 people), approximately 33% had a high school diploma or equivalent as their highest level of education. A further 11% had an apprenticeship or trade, while 31% had a college diploma or university degree. Nearly seventy percent (69%) of the working-aged population was participating in the labour force, with an unemployment rate of 16%. The median annual individual income was $40,800 (Statistics Canada 2023b).

9.4.1.2 Regional District of East Kootenay and Elk Valley Communities

Coal mining has historically been, and continues to be, a major part of the Elk Valley and Regional District of East Kootenay economies. The growth of the communities of Fernie and Sparwood during the first half of the 1900s and Elkford during the 1970s was the direct result of the development of the Elk Valley mines. As of 2019, there were seven operating coal mines in BC, four of which were in the Elk Valley and operated by Teck (now EVR). In 2021, Teck's Elk Valley mines produced approximately 24.6 million tonnes of the steelmaking coal, with 23.4 million tonnes sold in 2021 to customers around the world to be exported from the province. As of January 2020, the Elk Valley mines collectively employed over 4,000 workers with approximately 60% of workers living in Fernie, Sparwood, Elkford and Crowsnest Pass. Local employees fill 96% of senior management roles.

The Elk Valley communities of Fernie (population 6,315), Sparwood (population 4,145) and Elkford (population 2,750), BC, and Crowsnest Pass, Alberta (population 5,695), are located within approximately 15 to 60 km of the Project site, with Elkford being the closest community (Statistics Canada 2023b). Population projections indicate that between 2021 and 2031, the total population in the Fernie Local Health Area[36] is expected to grow by approximately 7% or less than 1% annually (BC Stats 2019). Projections indicate an increase in the percentage of

[36] The Fernie Local Health Area includes the communities of Fernie, Sparwood and Elkford as well as Tobacco Plains First Nation Reserve, Elko, Hosmer, Jaffray, Baynes Lake, Grasmere and Roosville.

the total population aged 65 years and over, from 14% of the total population to 22% of the total population. All other age categories are projected to see a decline in overall percentages during this same period, with the percentage of the population age 25 to 64 years expected to decline from 61% in 2021 to 55% in 2031.

Mining is the largest industry in each of the local communities, employing 71% of the male workforce and 25% of the female workforce in Elkford and 46% of the male workforce and 18% of female workforce in Sparwood (Statistics Canada 2023d). Labour forces in Fernie and Crowsnest Pass are somewhat more diverse; however, mining still employs 28% of males and 7% of females in Fernie and 32% of males and 4% of females in Crowsnest Pass (Statistics Canada 2023d).

The median total incomes in the Elk Valley region and local communities have historically been, and continue to be, among the highest in the province, particularly among the male workforce, due to the large mining and forestry sectors. For example, median total income among all working-aged males in Elkford was $99,000 as of 2020, 2.1 times the median total income of the male workforce in the province. However, there is an income gap between males and females. The 2020 median total income amongst all working-aged males in Elkford was 2.7 times the median total income for working-aged females (at $36,800). This pattern of sex-based income disparity is high when compared to the Regional District of East Kootenay and to the province of BC as a whole, where the median and total income for males was 1.5 and 1.3 times higher than for females, respectively.

With heavy dependency on coal mining, unemployment rates in the Fernie–Elk Valley area have been tied to the local mines' production levels, which in turn are directly influenced by international coal market conditions. As of 2021, the unemployment rate in the Regional District of East Kootenay was 15%, while Sparwood and Elkford's unemployment rate increased slightly from 2016, from 6% to 7% in Sparwood, and remained the same at 5% in Elkford, still lower than the provincial average of 8%.

With the regional economy being one of the least diversified in the province, economic growth strategies in the local communities are focused on expanding and diversifying local economies by supporting both resource-based (mainly mining) and tourism industries. Sparwood, Elkford, Fernie, the Yaq̓it ʔa·knuqƛi 'it First Nation (Tobacco Plains Band) and the communities' Chambers of Commerce are all members of the Elk Valley Economic Initiative, which supports regional economic development projects and initiatives for existing businesses, new businesses and the advancement of economic diversification. In addition to focusing on developing their goods, service and retail sectors to support ongoing mining operations, tourism and recreation, Sparwood has identified economic development opportunities in accommodation properties, agricultural processing or value-add development, and local education and research institutes, all supported through provision of flexibility in land use to promote business development and diversification. Elkford is focused on continuing economic development opportunities in the mining sector, expansion of commercial and tourism accommodation through development of a large hotel, and enhancement of recreational amenities within local parks.

In Fernie, tourism has evolved in tandem with the City's role as a residential community for mine workers. Key developments include: Fernie Alpine Resort; promotion and development of commercial outdoor recreational businesses such as fish guiding, rafting, and hunting; and tourism-related accommodation, beverage and entertainment businesses. Between 2011 and 2016, employment in retail trade more than tripled in Fernie in response to population growth, and the economies of both Fernie and Crowsnest Pass have been diversifying into the construction and manufacturing sectors. The Elk Valley communities rely heavily on taxes levied on the coal

mining industry to support recreational services due to a lack of economic diversity. In 2017, revenue from the Elk Valley Property Tax Sharing Agreement composed 25% of all municipal revenue in Sparwood, 41% of all municipal revenue in Elkford and 17% of all municipal revenue in Fernie.

Housing costs and availability in the Elk Valley region are linked to the strength of the mining industry: when the market price for coal is high, demand for labour drives housing costs up, which can cause substantial variability in housing prices from year to year. Cost of rental and owned accommodation varies across communities, with dwelling values in the local communities generally being below the provincial average. For example, in 2021, the average dwelling value in Elkford was $308,000 compared to $643,000 in Fernie (and $983,000 provincially). Between 2016 and 2021, average dwelling values grew by 13% in Crowsnest Pass, 16% in Elkford, 26% in Sparwood and 32% in Fernie, relative to provincial growth of 36%. It is acknowledged that the provincial growth is heavily skewed by the housing markets of Victoria and Vancouver. Housing availability is constrained in the vicinity of the Project by several factors: limited land available for development, competition from industrial contractors requiring workforce housing and the hesitance of developers to build in a market heavily influenced by a single industry that is susceptible to boom-bust cycles of commodity prices and workforce demand fluctuations. Between 2016 and 2021, the number of private dwellings grew by approximately 6% in Elkford and Crowsnest Pass, 3% in Sparwood and 7% in Fernie.

A number of hotels in the local communities offer temporary accommodation for visitors to the Elk Valley and temporary workers alike. Temporary worker accommodation for EVR contractors is also available at EVR's Elk Valley Lodge located in Elkford, BC.[37]

The four communities each have preschools and elementary and secondary schools operated privately and by the BC Ministry of Education, School District 5, the Ministry of Education (Alberta) and the Livingstone Range School Division No.68. The College of the Rockies services the East Kootenays with its main campus in Cranbrook and six secondary campuses, including one in Fernie. The college provides a mix of vocational, trades (including a mining apprenticeship training program), career technical, academic programs and adult education. Lethbridge College offers training programs, applied degrees and apprenticeships with both classroom-based and online credit classes and regional campuses in Crowsnest Pass. Available apprenticeship training applicable to the mining industry includes electrician, welder, heavy duty equipment technician and parts technician programs.

Each of the communities in the Elk Valley has its own fire department. There are also volunteer search and rescue teams in Elkford and Fernie. Ambulance service in the Elk Valley is provided by the BC Ambulance Service and is based in each of the local communities in BC. Health centres exist in each local community; however, more intensive treatment requires travelling to the regional hospital in Cranbrook. The Royal Canadian Mounted Police provides municipal police services in the municipalities and unincorporated rural areas, with the Sparwood, Fernie and Elkford police stations being collectively managed under the Elk Valley Integrated Detachment. The District of Elkford draws water from six nearby wells to supply water and sewer services to the community. Solid waste disposal services are provided through the Elkford Transfer Station.

The local communities, with the exception of Elkford, are located on a major highway network. Highway 3 is the key commuting route for those working in EVR's Elk Valley mines and living in Crowsnest Pass. In 2018,

37 For the temporary worker accommodation to be available for the Project construction workforce, it would require an extension to the municipal permit.

average daily traffic passing the permanent traffic measurement site on Highway 3, located 2 km west of the BC–Alberta provincial boundary, indicated that vehicles passing this site ranged in volume from 3,551 vehicles in November to 7,935 vehicles in August with a yearly average of 4,798 vehicles.

9.4.1.3 Land Use and Tenure

The Project would be located on Crown land coal leases held by EVR and on fee simple land owned by EVR (Figure 5.1-2). Access to the Project site is via Highway 43 north of Sparwood and then the Fording Mine Road east of Elkford (Figure 5.1-1). The mining portion of the Project is outside of the current FRO mine permit boundary (C-3 Permitted Mine Area). Lands associated with the Project footprint are zoned for Rural Resource under the Elk Valley Zoning Bylaw No. 829 of the Regional District of East Kootenay. The Rural Resource designation allows agricultural, rural residential and rural resource land uses and also recognizes the use of these lands for public utility use, resource extraction, green space and outdoor recreation. Land use plans are further discussed in Section 9.5.

Strategic land use planning within the East Kootenay Region that overlaps the Project footprint includes a variety of land use objectives, including those addressing commercial resource development. Under the Kootenay-Boundary Land Use Plan (Kootenay Inter-agency Management Committee 1997) and Higher Level Plan Order (Forest Practices Board 2002), the Project footprint is within the Coal Enhanced Resource Development Zone, which represents lands with priority management emphasis on coal resources and their exploration, development and production and provides long-term commitment to coal mining exploration and development. Coal Enhanced Resource Development Zones are located exclusively in the East Kootenay Region and encompass areas of known coal reserves, existing coal mining facilities and infrastructure as well as areas for potential expansion. EVR is aware that the Ktunaxa Nation has established formal and informal planning goals and objectives for the Elk Valley and is working with KNC to understand these and how they may be incorporated into the Project. This includes discussion on mechanisms to demonstrate environmental performance including the success of planned mitigation.

Coal mining and processing has been a primary economic driver and land use in the Elk Valley since the first coal mine was established at Coal Creek near Fernie in the late 1890s. Other land and resource uses within and surrounding the Project footprint include oil and gas exploration, timber harvest, trapping, guided hunting and fishing, and outdoor recreational activities such as golfing, wildlife viewing, camping, hiking, horseback riding, hunting, fishing, snowmobiling, all-terrain vehicle (ATV) riding, bike riding and skiing. An active petroleum and natural gas lease belonging to the Elk Valley Corporation overlaps the Project footprint.

Forestry takes place on Crown land and on private managed forest land that are adjacent to FRO (i.e., Managed Forest 471 and Managed Forest 27). Forest tenures overlap the Project and FRO area and tenure holder Canadian Forest Products Ltd. has harvest agreements with EVR related to access and the right to harvest. There is a network of forest service roads that overlap the Project footprint, which are owned and managed by Canadian Forest Products Ltd.

A No Unauthorized Entry (NUE) boundary exists for FRO and is established around the active operating areas to maintain public safety as a requirement of the *Health, Reclamation and Safety Code for Mines in British Columbia*. All persons (including hunters and anglers) must have permission to access property where EVR operates. The Project would change the NUE boundary to include the Project footprint.

The Project footprint is located within Wildlife Resource Management Unit 4-23 of the Kootenay Region. Open season hunting for licensed hunters occurs within Management Unit 4-23 (outside restricted no hunting/no shooting areas) for a number of small and big game species including deer, elk, moose, bear, and sheep. Limited Entry Hunting permits are available for moose and mountain goat within Limited Entry Hunting zone boundaries that overlap the Project footprint. The BC Special Mountain Sheep Permit auction, which raises funds for sheep management and conservation in BC, allows the recipient to hunt one of four subspecies of wild sheep anywhere in BC that is open for public hunting (including outside of FRO's existing NUE boundary) through an extended hunting season. Hunting activity occurs within the Project footprint outside the existing NUE boundary as well as lands to the west, east and south of the Project footprint. Although several commercial guides and outfitters operate in the Kootenay Region, there are no guiding tenures within the Project footprint. The nearest guide outfitting tenure is located approximately 5 km northwest of the Project, beyond the existing FRO and GHO boundaries. The Project would move mining activities further away from the nearest guide outfitting tenure.

While the Elk Valley provides world class fly fishing in the Elk River, fishing opportunities are limited within and adjacent to the Project due to a recreational fishing closure on the Fording River above Josephine Falls and access restrictions associated with the FRO NUE boundary.

Two trapline tenures overlap the Project. Access to traplines through EVR properties is provided with permission from EVR while maintaining public safety. Species trapped in this area include beaver, lynx, mink, wolf, marten, weasel and coyote. The closest trapping cabin is located approximately 1.3 km southeast of the Project.

Portions of the Project footprint fall in the Chauncey Todhunter Access Management Area. Portions of this management area encompass seasonal motor vehicle closures, as designated under the BC *Wildlife Act Motor Vehicle Prohibition Regulation* (BC Reg 196/99). The nearest provincial parks to the Project include Elk Lakes and Height of the Rockies Provincial Parks in BC, and Beehive Natural Area, which is located approximately 5 km east of the Project in Alberta, on the east side of the Continental Divide.

Outdoor recreation is highly valued by local residents and visitors to the area and is considered an important lifestyle attraction of the Elk Valley. Numerous outdoor recreational opportunities exist in areas where access is permitted surrounding FRO, including ATV and snowmobile riding, mountain biking, horseback riding, camping, hiking, fishing and hunting. The Elkford ATV Club manages several ATV and snowmobiling trails surrounding EVR's FRO and GHO areas. Registered angler guides attract an international clientele to fish along the Elk River. Recreational fishing is also popular on the Fording River downstream of Josephine Falls, although, as noted above, upstream of the falls is closed to recreational fishing. Public use of the existing FRO area is restricted within the no shooting/NUE boundary.

The Elk Valley is located in ʔamakʔis Ktunaxa, the territory of the Ktunaxa Nation. The Ktunaxa Nation is composed of Yaq̓it ʔa·knuqƛi 'it (Tobacco Plains Band), ʔaq'am (St. Mary's Band), yagan nuʔkiy (Lower Kootenay Band) and ʔakisq'nuk First Nation (Columbia Lake Band). The Ktunaxa Nation has a strong cultural heritage associated with the Elk Valley that includes language, knowledge, sacred values, sense of place, intergenerational transmission of knowledge and practices, and other values of importance.

Traditional land and resource use by Indigenous Peoples in the Elk Valley has included habitation, hunting, fishing, harvesting, cultivation and processing, use of the area for cultural practices, and creation and use of

trails and travel corridors that connect the valley to other areas. The Elk Valley and surrounding area is subject to ongoing treaty negotiations with the Province of BC and the Government of Canada.

Traditional use including plant and animal harvesting and fishing occurs within the region. Current use of the Project footprint and surrounding areas by potentially affected Indigenous Peoples is restricted by the existing NUE boundary established around the active operating areas of the mine site to maintain public safety. Health/sensory receptor locations have been identified by the Ktunaxa Nation for consideration in the assessment to be conducted for the Project. Receptor locations were identified based on existing Ktunaxa Nation use and occupancy information and were selected based on proximity to Ktunaxa Nation use values, such as habitation values, important trails and rights practice (Morris 2020).

9.4.1.4 Visual Aesthetics

The Project is located within the Fording River Valley bordered by the High Rock Range to the east and the Greenhills Range to the west. This area is characterized by rugged topography and natural coniferous landcover that create a predominately wilderness landscape character. The topography along the upper portions of Castle Mountain is steep with the peak reaching approximately 2,550 masl. Lower slopes are shallower, trending mainly westward towards the Fording River Valley.

Land cover in the valleys generally comprises Montane Spruce forests with inclusions of Douglas fir, lodgepole pine and western larch. At higher elevations, land cover is characterized by Engelmann Spruce – Subalpine Fir forest interspersed with grasslands and brushlands on steep warm aspect slopes. At the highest elevations, alpine grasslands remain on steep warm southern aspect slopes with stunted subalpine fir and inclusions of Engelmann Spruce, whitebark pine and subalpine larch.

Industrial land and resource use patterns in the region include open-pit coal mining that has visibly modified the landscape at EVR's operations. Forestry activity is also visible in both the Fording River Valley and the Elk Valley with vegetation established at various stages of regeneration in previously logged cutblock and access road areas. The Project footprint overlaps lands that are currently visibly impacted by industrial land uses related to FRO mining activities, forestry operations and mine exploration on Castle Mountain.

Recreational opportunities in the vicinity of the Project are available year-round and consist mainly of outdoor activities such as wildlife viewing, camping, hiking, biking, berry collecting, hunting, fishing, snowmobiling, ATV riding and skiing. Scenic areas are established in the Kootenay-Boundary Higher Level Plan Order (Forest Practices Board 2002) that reflect the importance of front country landscapes to communities, recreation and tourism, and that indicate landscape management guidance related to the design of timber harvesting, forest management and mineral exploration. While some of the scenic areas established under Objective 9 of the Kootenay-Boundary Higher Level Plan Order were cancelled in the transition from the *Forest Practices Code of British Columbia Act* (RSBC 1996, c159) to the *Forest and Range Practices Act*, visual quality objectives have been established and remain for scenic areas along Highway 43 south of Elkford.

In general, the existing lighting levels for viewers are considered representative of a dark setting with little to no existing light sources visible. Existing ambient light that brightens the natural dark sky background may be evident to viewers from areas located near industrial facilities and activities at GHO and FRO but would be considered to be representative of light levels perceived in sparsely inhabited rural to natural areas.

9.4.2 Health and Well-Being

Elkford, Sparwood and Fernie are located in the Fernie Local Health Area, within the East Kootenay Health Service Delivery Area, which is within the BC Interior Health Authority. Crowsnest Pass is located within Zone 1 (South) region of Alberta Health Services Administrated Areas.

Sparwood has a Primary Health Care Centre, which includes various services such as family medicine, physiotherapy, a diabetes clinic, a mental health clinic, a community dialysis clinic, a laboratory, public health services including immunization, and pre- and post-natal services. Elkford Health Centre includes a medical clinic as well as laboratory, X-ray, physiotherapy, public health, drug and alcohol counselling, and mental health and youth outreach services. The Elk Valley Hospital located in Fernie is a level one community hospital with inpatient care, obstetrics, emergency care, a laboratory and other services. Fernie also has a health centre, which includes a community care clinic. The Crowsnest Pass Health Centre offers 24hour emergency service, as well as a range of other health services including surgical procedures, X-ray, physiotherapy, occupational therapy and laboratory services. There is also a day service medical clinic in Blairmore, Alberta. The East Kootenay Regional Hospital in Cranbrook, BC, is the main health facility in the region.

A 2019/2020 survey by Statistics Canada of the East Kootenay Health Service Delivery Area found that in 2019/2020, the East Kootenay Health Service Delivery Area rates exceeded the provincial average rates for certain health behaviours including smoking, heavy drinking and body mass index (Statistics Canada 2023c). The rates have decreased since 2017/2018 for smoking and obesity but have increased for heavy drinking and being overweight. People in the East Kootenay Health Service Delivery Area had a higher proportion of the population with a regular healthcare provider than the province (85% compared to 82%).

Both in East Kootenay and across the province, females continue to report better health behaviours than males in every category except smoking. Sex differences are particularly apparent when it comes to self-reported weight, while the gap between males and females has shrunk for heavy drinking. However, health behaviours for females in East Kootenay have declined, with increasing proportions of the female population reporting smoking, heavy drinking and obesity than in 2017/2018. While more males than females were smokers in 2017/2018, the pattern has reversed and now more females than males smoke (daily and occasionally), contrary to the provincial pattern. Across the province, males are substantially more likely to smoke than females (13% of males versus 9% of females), while the percentage of males and females in the East Kootenay Health Service Delivery Area who smoke are higher than the provincial average.

For the Alberta South Zone (where Crowsnest Pass is located) in 2019, females also reported better health behaviours than males in every category, with the exception of physical activity (150 minutes per week; Statistics Canada 2023c). Health behaviours such as smoking and heavy drinking have declined in the Alberta South Zone from 2017/2018 to 2019/2020 while body mass index has risen.

The Sparwood Leisure Centre located in Sparwood houses an ice rink, pool, fitness centre, curling rink, restaurant and community hall. Sparwood also has a number of parks offering a bike park, bocce courts, horseshoe pitches, softball diamonds, a track, soccer field, basketball court, playground, spray park, skate park, tennis courts, volleyball court and picnic areas. The Elkford Recreation Centre located in Elkford has three curling rinks, indoor and outdoor ice rinks, and a toboggan hill. Elkford and Fernie each have an aquatic centre. Fernie also has an ice arena, a curling club, and outdoor basketball, baseball, soccer and tennis courts.

Recreational facilities in Crowsnest Pass include an indoor skatepark, indoor climbing wall, gymnasium and the Crowsnest Sports Complex, which houses curling and ice rinks and an outdoor pool.

The abundance and diversity of social organizations in a community play an important role in community health and well-being. A number of addiction-related services, mental health associations, support groups for specific illnesses, hospital auxiliaries and larger organizations such as the Canadian Red Cross are located within the local communities. A variety of community support and safety organizations exist within the four communities, including housing societies, women's centres, youth, children and infant programs, community support societies and the Food Bank. A Citizens on Patrol and Road Watch are located in Crowsnest Pass. Social organizations include clubs for children and youth (e.g., Cubs, Girl Guides and Scouts), groups for seniors, veteran's organizations and church-related activity groups.

Arts, cultural, educational and environmental organizations are prevalent and include arts and historical societies, wildlife associations, music organizations, community garden societies and outdoor educational groups. Sports and recreational organizations are also abundant and include fishing, lacrosse, boxing, running, golf, weightlifting, swimming, flying, skating, soccer, martial arts, hockey, skiing and snowmobiling organizations.

9.4.3 Archaeological Resources

The archaeological assessment of proposed development areas generally commences with an archaeological overview assessment (AOA) of the proposed project footprint. Through the overview assessment, AOA polygons are provided to the proponent for use in planning subsequent development and/or required archaeological field assessment.

Archaeological overview assessment polygons represent areas where archaeological resources, if present, may be adversely affected by activities including mine development. As such, they represent areas that will be subject to more intensive archaeological field investigation in the form of an Archaeological Impact Assessment, pursuant to Section 12.2 of the BC *Heritage Conservation Act* (RSBC 1996, c 187), or archaeological Site Alterations, under Section 12.4 of the BC *Heritage Conservation Act*. Upon ground-truthing of the high potential polygons, additional areas may be identified that require assessment (i.e., areas of archaeological potential defined in field and/or archaeological sites).

The process of defining AOA polygon areas for the FRX Project, and for previous mining and forestry development in the Project area, involved the analysis of criteria derived from pre-contact land and resource use models developed by Wayne Choquette for the middle Elk River and the southern Canadian Rocky Mountains (Choquette 1980, 1982, 1987a,b).

The FRX MYAB boundary was subject to an AOA in 2018 (Choquette and Tamasi 2018) through which a total of 21 landform-based polygons were produced and mapped within the MYAB boundary (Csl-01 through Csl-21). The Project footprint and a 200 m archaeological buffer zone encompass or overlap with an additional 34 AOA polygons derived from five previous overview assessment studies (Choquette ND, 2010, 2012, 2014; IC-05 *No Attribution* [ND]), giving a total of 55 AOA polygons overlapping or encompassed within the current Project footprint (Table 9.4-2).

Table 9.4-2: Archaeological Overview Assessment Polygons and Recorded Archaeological Sites within the Project Footprint and 200 Metre Buffer Zone

Archaeological Overview Assessment Polygon Number	Assessment Status: Complete / Partially Assessed / Unassessed	Archaeological Assessment Required Prior to the Onset of Ground-Altering Development
C21-81	completely assessed	**Archaeological Site EbPq-4** ***archaeological assessment required***
TS-03	completely assessed	none required – assessment complete
TS-04	completely assessed	none required – assessment complete
TS-05	completely assessed	none required – assessment complete
TS-07	completely assessed	none required – assessment complete
GH10-04 (west of Fording River)	completely assessed	**Archaeological Site EaPr-13** ***archaeological assessment required*** (the polygon is west of the Fording River and is, therefore, not considered in current scope)
Csl-01	completely assessed	none required – assessment complete
Csl-02	completely assessed	none required – assessment complete
Csl-03	completely assessed	none required – assessment complete
Csl-04	completely assessed	none required – assessment complete
Csl-05	completely assessed	none required – assessment complete
Csl-06	completely assessed	none required – assessment complete
Csl-07	completely assessed	none required – assessment complete
Csl-08	completely assessed	none required – assessment complete
Csl-09	completely assessed	none required – assessment complete
Csl-10	completely assessed	none required – assessment complete
Csl-11	completely assessed	none required – assessment complete
Csl-12	completely assessed	none required – assessment complete
Csl-13	completely assessed	none required – assessment complete
Csl-14	completely assessed	none required – assessment complete
Csl-15	completely assessed	none required – assessment complete
Csl-16	completely assessed	none required – assessment complete
Csl-17	completely assessed	none required – assessment complete
Csl-18	completely assessed	none required – assessment complete
Csl-19	completely assessed	none required – assessment complete
Csl-20	completely assessed	none required – assessment complete
Csl-21	completely assessed	none required – assessment complete
C21-01	completely assessed	**Archaeological Site EaPr-12** ***archaeological assessment required***
C21-03	completely assessed	none required – assessment complete
C21-04	completely assessed	none required – assessment complete
C21-51	completely assessed	none required – assessment complete
C21-52	completely assessed	none required – assessment complete

Table 9.4-2: Archaeological Overview Assessment Polygons and Recorded Archaeological Sites within the Project Footprint and 200 Metre Buffer Zone

Archaeological Overview Assessment Polygon Number	Assessment Status: Complete / Partially Assessed / Unassessed	Archaeological Assessment Required Prior to the Onset of Ground-Altering Development
C21-53	completely assessed	none required – assessment complete
C21-55	completely assessed	none required – assessment complete
C21-57	completely assessed	**Archaeological Site EaPq-13** ***archaeological assessment required***
C21-58	completely assessed	none required – assessment complete
C21-59	completely assessed	none required – assessment complete
IC-05	completely assessed	none required – assessment complete
C21-43	partially assessed: – Project footprint overlap	**Archaeological Sites EaPq-9, EaPq-10, EaPq-17, EaPq-18** and *Area of Potential – EaPq-18* ***archaeological assessment required***
C21-56	partially assessed – Project footprint overlap	**Archaeological Site EaPr-22** ***archaeological assessment required***
C21-70	partially assessed – Project footprint overlap	**Archaeological Sites EaPq-14, EaPq-15** and *Area of Potential – EaPq-14* ***archaeological assessment required***
C21-71	partially assessed – Project footprint overlap	**Archaeological Sites EbPr-27, EaPr-21, EaPr-30** and **EaPr-31** ***archaeological assessment required***
C21-72	partially assessed – Project footprint overlap	**Archaeological Sites EaPr-21, EaPr-31, EaPr-33** and **EaPr-34** ***archaeological assessment required***
C21-73	partially assessed – Project footprint overlap	**Archaeological Site EbPr-1** ***archaeological assessment required***
C21-75	partially assessed – Project footprint overlap	none required – assessment complete
C21-77	partially assessed – Project footprint overlap	none required – assessment complete
C21-74	unassessed	no assessment possible due to previous capping/disturbance
C21-82	unassessed	***archaeological assessment required***
C21-83	unassessed	***archaeological assessment required***
C21-84	unassessed	***archaeological assessment required***
C21-85	unassessed	***archaeological assessment required***
C21-87	unassessed	***archaeological assessment required***
C21-88	unassessed	***archaeological assessment required***
TM-01	unassessed	***archaeological assessment required***
GH10-03 (west of Fording River)	unassessed	***archaeological assessment required*** (the polygon is west of the Fording River and is, therefore, not considered in current scope)

To date, 38 of the 55 AOA polygons have been assessed in their entirety, eight have been partially assessed (where the Project footprint overlaps) and nine remain unassessed. Excluding archaeological sites EaPr-13 (AOA polygon GH10-04), EaPq-9 (AOA polygon C21-43), EaPq-18 (AOA polygon C21-43) and EaPq-13 (AOA polygon C21-57), as these are all either outside of the 200 m buffer zone or situated on the west side of the Fording River, there are a total of 16 archaeological sites and two areas of potential that are situated within or overlapping the Project footprint and/or buffer zone.

9.5 Land Use Plans

A number of land use plans apply in the Project region (Table 9.5-1). EVR is aware that the Ktunaxa Nation has established formal and informal planning goals and objectives for the Elk Valley. EVR is working with the KNC to understand these goals and objectives and how they may be incorporated into the Project.

Table 9.5-1: Land Use Plans and Area-Specific Regulations

Land Use Plan	Zoning Consideration	Potential Amendments Required
Kootenay-Boundary Land Resource Management Plan Implementation Strategy Kootenay Inter-agency Management Committee 1997	Portions of the Project would fall into the following zones: • Coal Enhanced Resource Development Zone[(a)] • Enhanced Resource Development Zone	Project is consistent with the land use plan. No amendments would be required for the Project.
Elk Valley Zoning Bylaw No. 829, 1990 Regional District of East Kootenay	Portions of the Project would fall into Rural Resource Zone RR-60.	Project is consistent with the bylaw. No amendments would be required for the Project.
District of Elkford Zoning Bylaw No. 737, 2013 District of Elkford	Portions of the Project would fall outside of the District of Elkford, which includes much of FRO.	The District of Elkford zoning might need to be amended to add the Project.
Motor Vehicle Prohibition Regulation BC *Wildlife Act*	Portions of the Project would fall into the Chauncey Todhunter Access Management Area[(a)]	The *Motor Vehicle Prohibition Regulation* will need to be amended to remove the Project from the Chauncey Todhunter Access Management Area as well as add FRX to the EVR Mining Closure section of the *Outdoor Access Guide: RDEK Area A, Fernie, Sparwood, Elkford* once under construction and operations.

a) The Coal Enhanced Resource Development Zone overlaps the Chauncey Todhunter Access Management Area.
RDEK = Regional District of East Kootenay

9.6 Federal Lands

The Project is located primarily on provincial Crown land subject to coal leases held by EVR, with portions of the Project on fee simple land owned by EVR (Figure 5.1-2). No federal lands would be used for the Project and there will be no direct Project impacts to federal lands. The closest federal lands, referred to as the Dominion Coal Block (Parcels 73 and 82), are located approximately 70 and 80 km south of the Project, respectively. Proximity of the Project to Indigenous and federal lands is illustrated in Figure 5.1-3 and Figure 5.1-4.

10.0 Potential Project-Related Effects and Mitigations

The potential effects of the Project will be assessed through the coordinated process established under the IAA and the BC EAA. The scope of the assessment and the methods for the assessment will follow environmental assessment guidance from Canada and BC and will be established in collaboration with potentially affected Indigenous Peoples, government regulators and agencies and other interested groups so that the effects of the Project are understood. The assessment will include consideration of:

- components of Indigenous culture, rights and title that have been identified by KNC and Yaq̓it ʔa·knuqƛi ’it through the additional engagement undertaken in response to the environmental assessment Readiness Decision Letter (BC EAO 2023) and through engagement with other potentially affected Indigenous Peoples
- components of the natural and human environment that are most important to people within the context of the Project and its potential effects
- mitigation measures and plans to avoid, minimize, rehabilitate or offset adverse impacts and enhance benefits
- integration with existing FRO and regional permits, plans and programs
- residual incremental and cumulative effects associated with the Project and other past, present and reasonably foreseeable developments

Early Engagement Feedback Note

Early engagement on the Project included feedback expressing concerns about potential Project-related effects and whether mitigations for these effects are plausible. This section focuses on the identification of those effects asserted by Ktunaxa Nation as having the potential to be extraordinarily adverse and the key mitigations considered necessary to address those concerns. Some of these key mitigations are well understood and their success has been previously demonstrated, whereas other mitigations are associated with some uncertainty. Where mitigation uncertainty is present, the IS/A will define clear, measurable, and time-bound targets and will identify reporting to track success and facilitate adaptive management, where needed.

Identification of potential Project–environment interactions that could lead to effects on the environment, and that should therefore be considered in the coordinated assessment process, was initiated with the provincial and federal IPD documents and July 2021 DPD, and has been updated to reflect ongoing data collection programs and engagement that has occurred since publication of these documents. The updated list of Project–environment interactions is presented in Appendix I. Identification of Project–environment interactions relied on:

- EVR’s (previously Teck’s) extensive history in the Elk Valley, including the many studies and impact mitigation programs that have been implemented for current and past coal mining operations in the region
- the available information about current and past coal mining in the Project region
- the expertise of the qualified professionals supporting the development of EVR’s IS/A for review and assessment of the Project
- engagement with KNC and Yaq̓it ʔa·knuqƛi ’it as further summarized below, and with other potentially affected Indigenous Peoples, regulators and other interested parties to date (Sections 7.0 and 8.0)

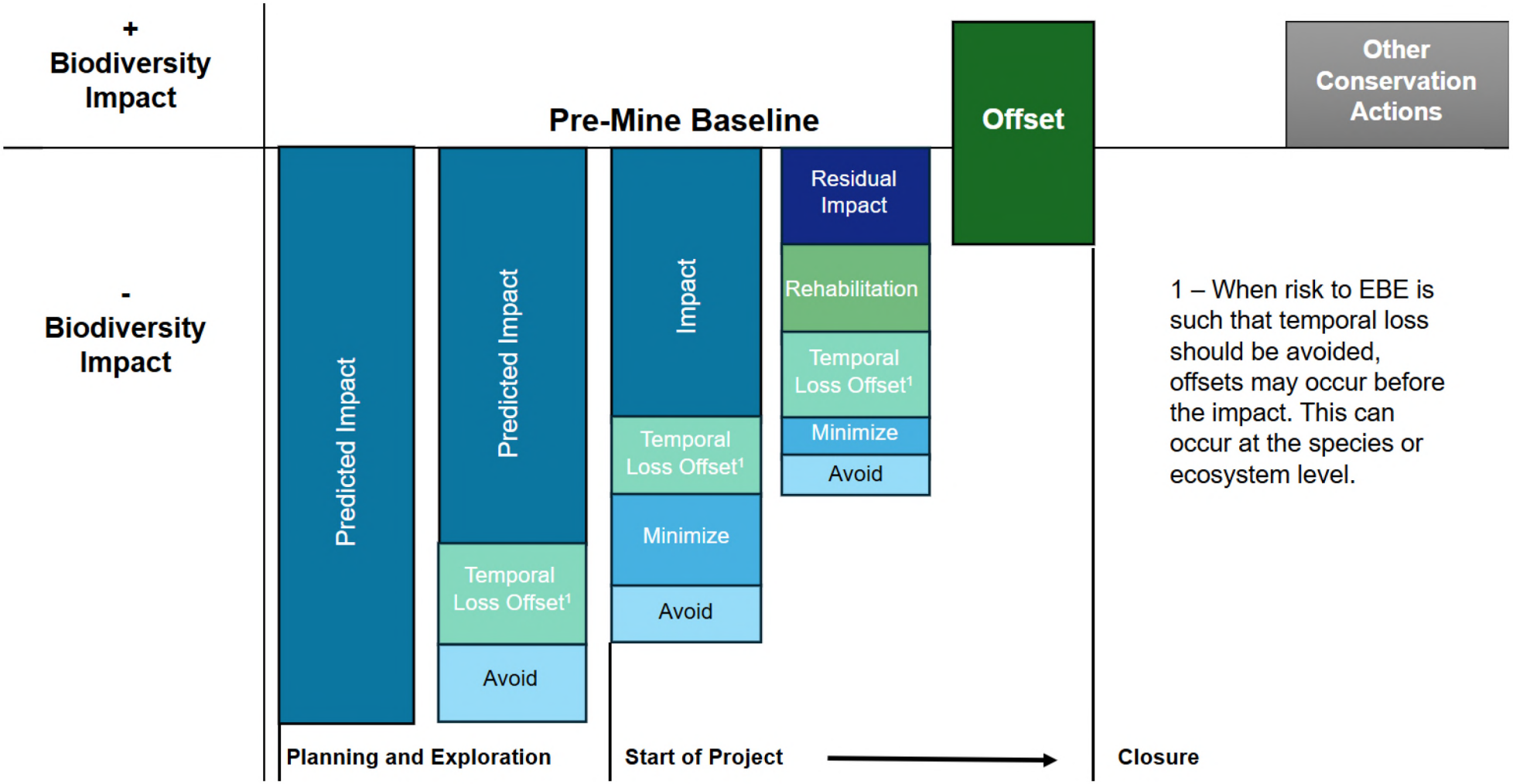
Following the identification of Project interactions, EVR began developing plans for mitigations to manage potential effects. In identifying plausible mitigations, the Project team practised application of the BC Policy for

Mitigating Impacts on Environmental Values (Government of British Columbia 2014) and EVR's mitigation hierarchy (Figure 10-1)[38], where mitigation actions are undertaken both in sequence and iteratively within the hierarchy:

1) **Avoid** - To the extent practicable, operations avoid impacts by modifying the design of a proposed project or existing operation.
2) **Minimize** - To the extent practicable, operations limit impacts that cannot be avoided through best available design technology and best management practices.
3) **Rehabilitate**[39] - Operations rehabilitate affected areas with reclamation programs that attempt to re-establish the target conditions.
4) **Offset** - Operations seek to offset impacts that cannot be fully mitigated through avoidance, minimization and rehabilitation measures, or when temporal loss to a VC is anticipated to compromise its viability or function.

[38] In the case of implementing a hierarchy of mitigation for effects to water quality, EVR has adopted the terminology of prevent, reduce and treat.

[39] EVR's mitigation hierarchy implements "rehabilitate" at step 3, whereas the BC Policy for Mitigating Impacts on Environmental Values uses the term "restore." Following engagement with interested parties, selection of "rehabilitate" was done in acknowledgement that restoration to prior conditions may not always meet preferred land uses.



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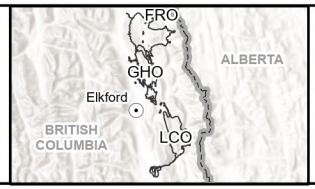


Figure 10-1: EVR's Mitigation Hierarchy

DATE: 6/6/2025	MINE OPERATION: FORDING RIVER

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In implementing the above mitigation hierarchy, EVR considers the cumulative effects on the environment caused by other parties' past, present and reasonably foreseeable future activities to inform plans and identify protective or restorative actions that are appropriate to the context, as well as EVR's overall potential contributions to existing conditions. With this information, planned actions are adjusted with the objective of optimizing mitigations to address both Project-specific effects and EVR's potential contribution to cumulative effects, and supporting adaptation to ongoing monitoring and research.

Following engagement on the July 2021 DPD, in particular concerns identified by Ktunaxa Nation based on the summary provided within the Readiness Decision Recommendation Report, EVR has undertaken additional effort to revisit the previously identified mitigations. This effort has included work to accomplish the following:

- Verify that the Revised DPD lists all the potential impacts, including cumulative impacts, of the Project on the biophysical components and to Ktunaxa rights identified during dispute resolution.
- Develop plausible mitigations that more carefully target addressing potential impacts to Ktunaxa rights and confirm if Ktunaxa and Yaq̓it ʔa·knuqƛi 'it agree that the proposed mitigations are plausible.
- Identify and describe mitigation measures necessary to resolve Ktunaxa and Yaq̓it ʔa·knuqƛi 'it assertions of extraordinarily adverse effects.
- Verify that the Revised DPD includes all plausible measures that mitigate the effects of the Project and cumulative effects in the Project area to which the Project would contribute.
- Apply the BC Policy for Mitigating Impacts on Environmental Values (Government of British Columbia 2014) when identifying plausible mitigation measures with attention to the mitigation hierarchy in order of priority.

To address the first three bullets above, EVR has carefully reviewed and considered the submissions made by KNC during dispute resolution and undertaken an extensive engagement process with KNC and Yaq̓it ʔa·knuqƛi 'it, as documented in the FRX comment tracking database. In advance of the engagement process with KNC and Yaq̓it ʔa·knuqƛi 'it, EVR also carried out its own review of the Project-environment interactions and mitigations to verify that the Revised DPD lists all potential Project-related impacts and plausible mitigations considered necessary to address them. Results of that review, along with the results of the engagement process undertaken with KNC and Yaq̓it ʔa·knuqƛi 'it, were then used to revise the Project-environment interactions and mitigations in Appendix I, addressing the fourth bullet.

EVR applies the BC Policy for Mitigating Impacts on Environmental Values through application of its internal mitigation hierarchy:

- integrating environmental, social and economic values in making decisions related to planning the Project
- improving the quality, transparency and consistency of information to support decision making for mitigating impacts on environmental values
- using the best available data and information to inform mitigation planning
- implementing the steps in the hierarchy in order of priority (avoid » minimize » rehabilitate » offset) with feasible measures considered and applied at one level before moving to the next

Table 10-1 outlines the general process identified for application of the BC Policy for Mitigating Impacts on Environmental Values along with how EVR is applying the process to the FRX Project.

Table 10-1: Application of the BC Policy for Mitigating Impacts on Environmental Values

BC Policy for Mitigating Impacts on Environmental Values General Process	Application by EVR for FRX Project
7.1 The general process for applying this Policy includes: *a. identification of the footprint and area of influence of the proposed project or activity and priority environmental values and associated components;* *b. assessment of potential impacts on environmental values and associated components;* *c. application of the mitigation hierarchy and consideration and selection of measures to avoid, minimize, and restore on site;* *d. assessment of the ecological equivalency of any remaining impacts and consideration and selection of measures to offset impacts on environmental values and associated components;* *e. development of a monitoring plan to assess and demonstrate implementation and report effectiveness of mitigation;* *f. implementation of the mitigation measures; and* *g. monitoring of implementation and effectiveness of mitigation measures.*	a. The Project footprint and area of influence, along with priority environmental values, were first documented in the IPD documents and July 2021 DPD and then re-evaluated following input received during the Readiness Decision Phase under the BC environmental assessment process. The updated footprint is identified in this Revised DPD, having been subject to further review using the mitigation hierarchy and following engagement regarding concerns related to the Project, as outlined in this Revised DPD. EVR has proposed VCs, representing priority values, to be evaluated in later phases of the assessment process and will continue to engage with interested parties on this topic during the Planning Phase of the assessment process. b. This Revised DPD lists the anticipated Project–environment interactions that have been identified for the Project through engagement or as a result of EVR's collective experience in the Elk Valley. This information is presented in Appendix I. c. At this stage in the Project, the mitigation hierarchy is being applied to the FRX Project to identify plausible mitigation measures. Mitigations selected to be implemented for the Project will be identified in the IS/A following further evaluation (refer to d below), including continued application of the hierarchy. d. Further evaluation of the effectiveness of the mitigations to address impacts to VCs is planned as part of the assessment for the FRX Project. Based on this evaluation, the mitigations to be implemented for the Project will be refined and documented. e. Once mitigations to be implemented for the Project are selected and their effectiveness is estimated, monitoring plans will be developed to document implementation, verify effectiveness and resolve uncertainties that may have been identified during the assessment. Monitoring plans will also include a framework for adaptative management that will guide EVR's actions in the event mitigations are not performing as expected. f. Implementation of mitigations will be done in accordance with the mitigation plans (refer to next row in the table). Implementation timing may vary depending on the timing of the anticipated effect and/or the agreements made with regulators and/or potentially affected Indigenous Peoples. g. Monitoring will be implemented consistent with the monitoring plans developed as part of the overall mitigation plans (refer to next row in the table).

Table 10-1: Application of the BC Policy for Mitigating Impacts on Environmental Values

BC Policy for Mitigating Impacts on Environmental Values General Process	Application by EVR for FRX Project
7.2 A mitigation plan should be developed to: a. provide an overview description of the proposed project or activity; b. transparently and defensible describe how mitigation will be applied (as outlined in Section 7.1 of this Policy); c. describe how uncertainties will be considered and addressed; and d. state commitments for the implementation of mitigation measures.	Mitigation plans will be documented in the IS/A. The IS/A will describe the Project and Project activities, how mitigation will or has been applied, and how uncertainties have been (or will be) considered and addressed (or will be addressed). The mitigation plans will state EVR's commitments related to mitigations and will document plans for subsequent design effort, permitting requirements, implementation, timing and monitoring.
7.3 An in-lieu payment from a proponent, to fund implementation of offsets by the Province or a third party in accordance with provincial financial procedures, may be appropriate under certain circumstances	An approach to offsetting impacts will be documented in the IS/A. Offsetting will consider guidance in Canada's Offsetting Policy for Biodiversity (ECCC 2020) and will target actions implemented by EVR to achieve no net loss. In-lieu payments would be considered by EVR on a case-by-case basis in the event that other plausible mitigations are not available or appropriate given the circumstances.

IS/A = Impact Statement/Application; IPD = Initial Project Description; DPD = Detailed Project Description; VC = valued component

The full list of potential effects of the Project and cumulative effects in the Project area that the Project would contribute to as identified through engagement, EVR's experience in the Elk Valley and through the dispute resolution process, along with plausible mitigations to manage effects, are presented in Appendix I, in accordance with the Readiness Decision Letter (BC EAO 2023). The remainder of this section focuses on the identification of potential impacts, including cumulative impacts, of the Project on biophysical components and to Ktunaxa rights that were identified during the dispute resolution process and plausible mitigations to address those potential impacts. The plausible mitigations identified and described in this section include mitigation measures necessary to resolve those effects asserted by Ktunaxa Nation as having the potential to be extraordinarily adverse. Some of these key mitigations are well understood and their success has been previously demonstrated, whereas other mitigations are associated with some uncertainty. Where mitigation uncertainty is present, the IS/A will define clear, measurable, and time-bound targets and will identify reporting to track success and facilitate adaptive management, where needed.

EVR has identified plausible mitigation measures for all Project effects in accordance with the Readiness Decision Letter (BC EAO 2023), but the mitigation measures to be implemented for the Project will be identified later in the assessment process. Mitigation measures selected to be implemented for the Project will be identified in the IS/A following further evaluation and engagement with KNC and Yaq̓it ʔa·knuqƚi ’it and other potentially affected Indigenous Peoples. EVR will continue to engage with Ktunaxa, including KNC and Yaq̓it ʔa·knuqƚi ’it, and other potentially affected Indigenous Peoples throughout the assessment process to collaboratively develop mitigations to be implemented for the Project and to develop monitoring and adaptive management plans to verify that mitigations are effective and to support modifications of mitigation plans where necessary.

10.1 Identification of Potential Effects and Approach to Developing Mitigations

This section lists all the potential impacts of the Project on biophysical components and to Ktunaxa rights that have been identified as part of the dispute resolution process and identifies plausible mitigations to impacts on Ktunaxa Nation and Ktunaxa rights, including mitigation measures to resolve KNC and Yaq̓it ʔa·knuqƛi ’it assertions of extraordinarily adverse effects. KNC and Yaq̓it ʔa·knuqƛi ’it’s concerns related to potential extraordinarily adverse effects are presented in more detail in the documents developed as part of the dispute resolution process that was implemented following Teck’s submission of the July 2021 DPD. The following represents a summary of the primary concerns identified by KNC and Yaq̓it ʔa·knuqƛi ’it in its August 11, 2022, dispute resolution submission, as interpreted and summarized by EVR.

KNC and Yaq̓it ʔa·knuqƛi ’it expressed particular concern regarding the size, location and duration of the Project. KNC and Yaq̓it ʔa·knuqƛi ’it flagged that the Project is the largest coal mine project that has been proposed in the Elk Valley and is situated in the upper Fording River, an area identified by the EV-CEMF as the “highest hazard” area within the region. Specific concerns extended to the size of the footprint, the strip ratio, the total mine rock volume, the life of mine and the total and annual production compared to existing or other proposed mine projects in the Elk Valley, and the contribution that such a large project would make to existing impacts.

In addition, KNC and Yaq̓it ʔa·knuqƛi ’it identified concerns regarding EVR’s ability to predict, control, manage and mitigate the adverse effects of steelmaking coal mining in the Elk Valley. KNC and Yaq̓it ʔa·knuqƛi ’it identified concerns that Teck has not satisfactorily demonstrated an ability to manage its mining impacts or successfully restore mine areas in a timely manner to a self-sustaining and ecologically and culturally functional condition. KNC and Yaq̓it ʔa·knuqƛi ’it also cited concerns regarding Teck’s adaptive management, research and monitoring programs, ability to achieve full compliance with existing permitting conditions, and the Province’s success at enforcing permit conditions intended to mitigate impacts to Ktunaxa Nation and the environment. These concerns were identified as leading to a lack of confidence in EVR’s ability to adequately mitigate the potential effects of the Project.

With this context, the KNC and Yaq̓it ʔa·knuqƛi ’it flagged the potential for extraordinarily adverse effects, defined as effects that were anticipated to be significantly adverse and unmitigable. The following effects to Ktunaxa rights and the biophysical environment were identified as part of the dispute resolution process and were identified to be potentially extraordinarily adverse by KNC and Yaq̓it ʔa·knuqƛi ’it in relation to the July 2021 DPD:

- effects on the rights of Ktunaxa First Nations, as affirmed by Section 35 of the *Constitution Act, 1982* and recognized and protected by UNDRIP:
  - further displacement of Ktunaxa from Castle Mountain, an area representing over 2,000 ha of the lands and waters of Qukin ʔamakʔis and significant additional loss of lands and waters to support the exercise of Ktunaxa hunting, fishing, harvesting and plant and mineral gathering rights
  - further contamination of downstream waters that render those waters undrinkable for Ktunaxa and seriously infringe Ktunaxa’s right to harvest and rely on the fish which bioaccumulate those contaminants
  - interference with and infringement of Ktunaxa stewardship and governance rights, including the rights to protect and determine the use of lands and resources in accordance with the Ktunaxa value of ʔa·kxaw̓is q̓api qapsin – all living things

  - interference with and infringement of Ktunaxa's right to maintain a healthy culture through the exercise of rights and cultural practices within the Project area, including the elimination of the ability of Ktunaxa to use the Project area for purposes of knowledge and language transmission between generations
  - interference with and infringement of Ktunaxa's right to ownership of and control of mineral resources, including the right to determine how those resources will be used and the right to benefit from their use
  - interference with and infringement of Ktunaxa's relationship with the land, which is central to Ktunaxa identity, culture and way of being
- effects related to impacts to rights:
  - impacts to preferred transportation routes, hunting areas and habitation areas on Castle Mountain and along adjacent waterways due to destruction of 2,330 ha of largely intact high elevation cultural landscape used for hunting and travel, and destruction of 10 km of trails
  - impacts to Ktunaxa knowledge and language including transmission of place-specific knowledge and future Ktunaxa relationships with the land due to loss of such areas
  - impacts to Ktunaxa ability to harvest and practise rights dependent on high elevation grasslands, due to loss of remaining high elevation grasslands (prime bighorn sheep winter habitat) in the Elk Valley leading to additional loss of high elevation grasslands compared to 1950s baseline
  - impacts to Ktunaxa confidence in wild foods and surface drinking water caused by increasing loads of contaminants from mine rock deposition added to water that already does not meet water quality guidelines
- effects on the terrestrial environment:
  - impacts to terrestrial habitat and biodiversity overall
  - impacts to red- and blue-listed high elevation grasslands
  - impacts to blue-listed bighorn sheep
  - impacts to grizzly bear
  - high volume of mine rock
  - high bonding requirements
- effects on the aquatic environment:
  - impacts to surface water and groundwater quality associated with contaminant loading
  - impacts to aquatic biota associated with changes to water quality
  - physical impacts to tributaries, with a particular concern identified for Chauncey Creek
  - impacts to WCT
  - impacts to water flows/water quantity
  - impacts to human health related to changes in surface and ground water quality
  - impacts to human health related to ʔa·kpiɈis (Ktunaxa "favourite food")
  - failure of effective regulatory oversight
  - inability to meet compliance with regulatory requirements and the Boundary Waters Treaty

All of the above effect pathways are considered to have the potential to affect identified rights in a cumulative manner, given that these effects are already experienced by Ktunaxa in the Elk Valley as a result of existing mining and other resource harvesting (forestry) and activities on private land holdings.

As context for the above, KNC and Yaq̓it ʔa·knuqƛi ’it were concerned that Ktunaxa stewardship values would not be protected in the Elk Valley and that Ktunaxa cultural rights, including knowledge transmission and stewardship, have already been displaced by more than 50 years (two generations) of mining in the upper Fording River, particularly as exercised by Yaq̓it ʔa·knuqƛi ’it. Concerns were identified that the Project would expand the area of displacement and extend operations by another 50 years to more than four generations, meaning that the chain of Ktunaxa knowledge transmission regarding the area could be severed.

Based on the input received during dispute resolution, Teck (now EVR), KNC and Yaq̓it ʔa·knuqƛi ’it developed the engagement framework described in Section 1.2.5 including the following objectives:

- Better understand existing impacts to Ktunaxa rights in the Elk Valley.
- Help improve the FRX Project compatibility with Ktunaxa values.

In identifying plausible mitigations, Teck (now EVR), KNC and Yaq̓it ʔa·knuqƛi ’it considered the BC Policy for Mitigating Impacts on Environmental Values and EVR’s mitigation hierarchy described in Section 10.0, in addition to KNC and Yaq̓it ʔa·knuqƛi ’it perspectives on culturally appropriate mitigation efforts. This work contributed to the development of proposed Project criteria which influenced the Project design to further avoid and reduce potential impacts. The plausible mitigations identified for the Project along side EVR’s current existing mitigations demonstrate strong measures to mitigate extraordinarily adverse effects.

Sections 10.1.1 to 10.1.4 relay the results of engagement with KNC and Yaq̓it ʔa·knuqƛi ’it to identify plausible mitigations to address the potential for extraordinarily adverse effects, with Table 10.1-1 to Table 10.1-4 being an outcome of workshop #7 held in March 2025[40] as well as feedback provided by KNC and Yaq̓it ʔa·knuqƛi ’it on the draft Revised DPD.

10.1.1 Impacts to Terrestrial Environment

Table 10.1-1 relays the results of the post-Readiness Decision review conducted by EVR and the engagement undertaken with KNC and Yaq̓it ʔa·knuqƛi ’it regarding impacts to the terrestrial environment that have been identified by KNC and Yaq̓it ʔa·knuqƛi ’it as part of the dispute resolution process, including those asserted by Ktunaxa as potentially extraordinarily adverse. The following actions embedded in the mitigation hierarchy were considered when developing the list of the key mitigations used to address the potential for extraordinarily adverse effects presented in the table:

- **Avoidance** - Identification of opportunities to avoid impacts to the terrestrial environment and biodiversity overall, and specifically to red- or blue-listed grassland and brushland ecosystems, bighorn sheep and grizzly bear, focused on an in-depth review and evaluation of the Project footprint to determine if it could be reduced. This evaluation was undertaken by EVR following the Readiness Decision through a series of terrestrial workshops. As a result of early engagement, the Project footprint was refined, and through the Revised DPD process it was confirmed that this footprint is required to implement the Project considering geotechnical constraints and other decisions regarding Project means (Section 4.0), with limited exceptions. Through engagement with KNC, we have worked to collaborate on opportunities to avoid impacts to the terrestrial environment and biodiversity through the Project footprint. It was KNC’s preference to categorize

[40] Mitigations in Table 10.1-1 represent mitigations in addition to the actions identified in Table 9.1-1.

the avoidance measures as minimization unless it was demonstrated to be a full avoidance in the tables below.

- **Minimization** - Identification of opportunities to minimize impacts to the terrestrial environment focused on evaluating whether temporal impacts to terrestrial VCs and biodiversity overall could be minimized. In addition, a key component of minimizing contributions of the Project to adverse cumulative effects will be progressive reclamation at other parts of FRO and other EVR operations in alignment with five-year reclamation planning and as feasible opportunities are available.
- **Rehabilitation** - Where avoidance and minimization cannot fully address potential residual impacts while maintaining a viable Project design, rehabilitation is an integral part of the mitigation hierarchy. EVR is focused on achieving reclamation excellence on a landform design for the Project through: creation of self-sustaining ecosystems that support native wildlife populations including key species of concern identified by KNC and Yaq̓it ʔa·knuqƛi ’it, such as bighorn sheep and grizzly bear; incorporating broader landscape functions; and by focusing on getting reclaimed ecosystems on a trajectory toward approximating native ecosystems (Section 5.6) and supporting key species of concern. EVR has been actively researching landform design, initial reclamation practices (e.g., soil placement and planting prescriptions) and ongoing reclamation maintenance (e.g., invasive species control) to maximize reclamation success. For some VCs, such as bighorn sheep, EVR has demonstrated substantial success in mitigating population impacts. However, EVR recognizes that uncertainty remains about the success of reclamation for other VCs, such as native grassland ecosystems. To address this uncertainty, EVR will continue to undertake research and monitoring as the Project progresses to improve reclamation outcomes for these ecosystems with the goal of addressing most of the residual impact of the Project through rehabilitation. Ongoing research and monitoring work has highlighted successful outcomes and learnings from historical road reclamation in high elevation grasslands on Banner Mountain and benefits of direct soil placement during mine reclamation.
- **Offsetting** - Given uncertainty in rehabilitation success, an offset plan will be submitted as part of the IS/A for the Project to mitigate predicted residual impacts to species at risk (e.g., grizzly bears), wetlands and key ecological communities at risk (e.g., grasslands) that are not addressed through avoidance, minimization or rehabilitation. The objective of the offset plan will be to achieve a minimum of no net loss for these VCs with respect to the Project, meeting the requirements of the TISG/AIR. EVR’s approach to offsetting will consider both restoration offsets to restore ecosystem and VCs on fully or partially degraded sites not previously impacted by EVR and avoided loss offsets that reduce projected external impacts that would likely have occurred without EVR’s intervention.
- **Addressing uncertainty** - Although the proposed mitigations provide a plausible means to prevent the potential for extraordinarily adverse effects, there is uncertainty about some aspects of mitigation efficacy and the scale at which it must be implemented. This uncertainty will be addressed through the IS/A process through the development of clear, measurable and time-bound targets, developed in collaboration with the Ktunaxa Nation and other potentially affected Indigenous Peoples, and a plan to monitor against targets and adjusting mitigation, if necessary, to achieve outcomes required for the Project (e.g., no net loss of important terrestrial biodiversity, meeting the requirements of the TISG/AIR). If successful, the combination of rehabilitation and offset actions associated with the Project could generate net positive outcomes for the terrestrial environment.

Table 10.1-1: Potential Extraordinarily Adverse Effects Identified by the Ktunaxa Nation and Plausible Mitigations (Terrestrial Environment)

Description	Mitigation Hierarchy	Plausible Mitigations Incorporated into the Project
Impacts to terrestrial habitat and biodiversity overall	Avoid	• Implementing management actions developed by Teck (now EVR), including actions identified in the Bird Guideline (Canada) document to avoid impacts to nesting birds (Teck 2023b) and FRO's Wildlife Mitigation Management Plan and other ecosystem/species management plans to avoid disturbance to important life phases and avoid negative interactions between people and wildlife at EVR's sites (Teck 2016b). • EVR worked to refine and reduce the Project footprint from the July 2021 DPD in an attempt to avoid impacts. Although impacts were reduced through footprint modification, complete avoidance of terrestrial habitat was not possible because the Project footprint as proposed in this Revised DPD is required to implement the Project (Section 4.0). In consultation with the KNC, mitigation actions to alter the footprint were classified as minimization if complete avoidance was not possible and these actions are therefore detailed under "minimize" in the next row.
	Minimize	• Refining the mine design from the July 2021 DPD to the current mine plan, reducing the overall disturbance footprint by 324 ha and the volume of mine rock by 1 Bbcm (Section 4.0). • Optimizing the mine design within the terrestrial footprint by maximizing use of previously disturbed areas. • Refining the Project footprint from the July 2021 DPD to relocate the south sediment ponds, reducing disturbance by 20.3 ha of wetland ecosystems, 24.8 ha of red-listed grassland ecosystems, 11.4 ha of blue-listed bushland ecosystems and 101.2 ha of mesic forest ecosystems. • Continuing to investigate and implement changes to blasting practices and application of castover management to minimize impacts from fly rock and castover, particularly to reduce castover on the east slope of Castle Mountain into the Chauncey Creek drainage or adjacent to culturally sensitive areas. This could include the evaluation of techniques such as of berms, netting, excavation, or blasting techniques and/or using best achievable technology assessment methods (BC ENV 2024). • Establishing and operating a whitebark pine orchard to secure a rust-resistant seed source for reclamation, offsetting and other regional projects, contributing to blister rust resistance efforts (seed and parent trees). • Following EVR's Invasive Plant Management Plan (Teck 2022d) and working with Ktunaxa Nation, including KNC and Yaq̓it ʔa·knuqƛi 'it, to revise list of invasive plants to reflect Ktunaxa perspective of invasive plants, to avoid (and minimize) impacts associated with introduction of invasive plants. Establishing monitoring ecosystem/plant indicators and thresholds to assess health of the areas (high/medium/low). • Continuing EVR's recycling program and evaluating supplemental options to no longer put garbage within mine rock storage areas, including haul truck tires. • Following the Ktunaxa Forestry Standards Document and working with KNC and Yaq̓it ʔa·knuqƛi 'it when timber clearing to minimize impacts to wildlife habitat or cultural value. • Working with Ktunaxa, including through direct engagement with KNC and Yaq̓it ʔa·knuqƛi 'it, to integrate Ktunaxa knowledge into management plans through the development of the IS/A. • Contributing to offsetting through support of Ktunaxa initiatives that may or may not be centrally focused on Qukin ʔamakʔis, based on Ktunaxa priorities. These support Ktunaxa rights and allow for self-determination. • Considering regional initiatives, plans and programs in prioritizing minimization efforts.

	Rehabilitate	• Collecting cones from healthy whitebark pine within disturbance areas and transplanting healthy young individuals ahead of disturbance, where applicable and feasible, to preserve genetics from local populations and promote establishment of whitebark pine blister rust disease-resistant individuals.
		• Developing a restoration plan that balances the objective of optimizing habitat for species and communities impacted by the Project that are of the highest conservation value or greatest concern to land users and land stewards including potentially affected Indigenous Peoples (referred to as priority ecosystems and including high elevation grasslands and brushlands and old and mature forests). The plan should recognize the limitations and uncertainties associated with reclamation in mountain environments and anticipate the limitations that may be associated with offsetting required after implementation of the restoration plan.
		• Undergoing engagement within the assessment phase with KNC and Yaq̓it ʔa·knuqƛi 'it including developing end land use goals considering Ktunaxa values, which include re-establishing surface water and creating functionality.
		• Considering climate appropriate habitats and ecosystems for future climate scenarios in the restoration plan.
		• Committing to, as part of the restoration plan, conducting studies to reduce reclamation uncertainty with input from KNC and Yaq̓it ʔa·knuqƛi 'it, which would include Ktunaxa knowledge and science, and monitoring data.
		• Seeking opportunities to improve previously regionally reclaimed areas that are not functional or high-quality.
		• Evaluating alternative methods (e.g., optimal topsoil depth over coarse coal rejects and/or overburden) for restoring ecosystems including grasslands and brushlands.
		  ○ Commit to methods and target area values for restoring grassland and brushland ecosystems.
		  ○ Investigate wetland opportunities through reclamation. Reclamation prescriptions determined to be successful could be applied to the Project.
		• Using whitebark pine in reclamation areas and explore opportunities for whitebark pine nurseries.
		• Assessing the possibility of establishing a second whitebark pine orchard with the location determined in collaboration with KNC and Yaq̓it ʔa·knuqƛi 'it.
		• Staging the Project provides an opportunity to improve certainty associated with reclamation activities focused on terrestrial habitat and biodiversity overall. Staging the Project may also increase the flexibility associated with bonding requirements.
		• Aligning rehabilitation and conservation priorities and efforts with regional initiatives, plans and programs such as the EV-CEMF.

	Offset	• Working with Ktunaxa, including through direct engagement with KNC and Yaq̓it ʔa·knuqƛi 'it, to identify offsetting opportunities, including consideration of location and function. • Creating wetlands and enhancing degraded wetlands in partnership with Ducks Unlimited and others at off-site locations, or other opportunities. • Acquisition of additional private lands or leases for conservation and offsetting.
Impacts to red- and blue-listed grassland and brushland ecosystems	Avoid	• EVR worked to refine and reduce the footprint from the July 2021 DPD in an attempt to avoid impacts. Although impacts were reduced through Project footprint modification, complete avoidance of red and blue-listed grassland and brushland ecosystems was not possible because the Project footprint as proposed in this Revised DPD is required to implement the Project (Section 4.0). In consultation with the KNC, mitigation actions to alter the footprint were classified as minimization if complete avoidance was not possible and these actions are therefore detailed under "minimize" in the next row.
	Minimize	• Refining the mine design from the July 2021 DPD to the current mine plan, reducing the overall disturbance footprint by 324 ha and the volume of mine rock by 1 Bbcm (Section 4.0) and reducing impacts to red- and blue-listed grassland and brushland ecosystems by 24.8 ha for red-listed grasslands and 11.4 ha for blue-listed brushlands. • Continuing to investigate and implement changes to blasting practices and application of castover management to minimize impacts from fly rock and castover, particularly to reduce castover on the east slope of Castle Mountain into the Chauncey Creek drainage or adjacent to culturally sensitive areas. This could include the evaluation of techniques such as of berms, netting, excavation, or blasting techniques and/or using best achievable technology assessment methods (BC ENV 2024). • Implementing EVR's Draft High Elevation Grassland Ecosystem Management Plan, including mitigation measures to reduce impacts to these ecosystems. • Collecting native cones and seeds and expansion/establishment of seedbeds/nurseries to improve availability of key grassland ecosystems within the Project footprint.

Table 10.1-1: Potential Extraordinarily Adverse Effects Identified by the Ktunaxa Nation and Plausible Mitigations (Terrestrial Environment)

Description	Mitigation Hierarchy	Plausible Mitigations Incorporated into the Project
Impacts to red- and blue-listed grassland and brushland ecosystems	Rehabilitate	• Developing an evidence-based restoration plan that optimizes grassland and brushland reclamation on the reclamation landform, which may include temporary areas. • Conducting trials of grassland reclamation at existing reclamation sites within EVR's operations in the Elk Valley with input from KNC and Yaq̓it ʔa·knuqƛi 'it.
	Offset	• Initiating long-term monitoring plots in recent wildfire areas on Greenhills Ridge (Mount Bingay) to monitor community change post-fire and confirm whether actions can be taken to enhance or maintain grassland conditions. • Conducting forest encroachment treatments to increase the extent and quality of grasslands. • Exploring opportunities within the assessment study area and then subsequently, if necessary, beyond these areas for the occurrence of grasslands and offsetting opportunities, including temporal considerations and existing impacts. • Rehabilitating legacy exploration roads using natural regeneration and/or native seeding in other areas of the Elk Valley, primarily within and adjacent to grasslands and brushlands with input from KNC and Yaq̓it ʔa·knuqƛi 'it.
Impacts to bighorn sheep	Avoid	• EVR worked to refine and reduce the Project footprint from the July 2021 DPD in an attempt to avoid impacts. Although impacts were reduced through footprint modification, complete avoidance of bighorn sheep habitat, including winter range, was not possible because the Project footprint as proposed in this Revised DPD is required to implement the Project (Section 4.0). In consultation with the KNC, mitigation actions to alter the footprint were classified as minimization if complete avoidance was not possible and these actions are therefore detailed under "minimize" in the next row.
	Minimize	• Refining the mine design from the July 2021 DPD to the current mine plan, reducing the overall disturbance footprint by 324 ha and the volume of mine rock by 1 Bbcm (Section 4.0). Modelling to quantify the specific effect of these mitigations on bighorn sheep will be conducted and documented in the IS/A. Consideration will be given to the ongoing work being carried out by the Biodiversity Management Technical Advisory Group to support FRO's Biodiversity Management Plan, which reflects an improved understanding of the impacts and effectiveness of mitigation actions. Footprint reduction is expected to benefit this species in terms of habitat quality and quantity. • Continuing to investigate and implement changes to blasting practices and application of castover management to minimize impacts from fly rock and castover, particularly reduce castover on the east slope of Castle Mountain into the Chauncey Creek drainage or adjacent to culturally sensitive areas. This could include the evaluation of techniques such as of berms, netting, excavation or blasting techniques and/or using best achievable technology assessment methods (BC ENV 2024). • Developing strategically located mineral licks to keep bighorn sheep and other ungulates away from active mine roads, active mining and other mining-related activities. • Establishing and identifying foraging sites specifically for sheep; relieving grazing pressure from elk on key bighorn sheep forage.
	Rehabilitate	• Targeting restoration of bighorn sheep habitat, including winter range, in the restoration plan for the Project with input from KNC and Yaq̓it ʔa·knuqƛi 'it. Based on the known effectiveness of restoration plans on bighorn sheep habitat, a net positive impact to this species is anticipated at closure relative to 2022 conditions. • Implementing newly developed seeding guidelines for operations in the Elk Valley including seeding prescriptions for bighorn sheep forage (Teck 2024d). • Integrating habitat features into the closure landscape to promote use by bighorn sheep, including design of escape terrain with associated reclaimed grasslands (steep areas near forage) and connected ridgelines in the final landform design. The province will need to support initiatives to accept changes to landform design.
	Offset	• Offsetting is not anticipated to be needed for bighorn sheep after appropriate rehabilitation is implemented because sufficient habitat can be created on the mining landscape; however, this will be confirmed through the assessment conducted for the Project. The IS/A will consider temporal losses to bighorn sheep habitat and will identify offsets should they be necessary. Note that offsets are a mitigation for high elevation grasslands and offsets implemented for these ecosystems will likely also benefit bighorn sheep.
Impacts to grizzly bear	Avoid	• Following the Grizzly Bear Denning Management Plan (Teck 2020c) to avoid grizzly bear mortality associated with clearing while bears are denning, including using denning habitat suitability mapping and field surveys to identify potential dens ahead of Project work. The Grizzly Bear Denning Management Plan will be reviewed with Ktunaxa, including KNC and Yaq̓it ʔa·knuqƛi 'it, during development of the IS/A. • EVR worked to refine and reduce the Project footprint from the July 2021 DPD in an attempt to avoid impacts. Although impacts were reduced through footprint modification, complete avoidance of grizzly bear habitat was not possible because the Project footprint as proposed in this Revised DPD is required to implement the Project (Section 4.0). In consultation with the KNC, mitigation actions to alter the footprint were classified as minimization if complete avoidance was not possible and these actions are therefore detailed under "minimize" in the next row.
	Minimize	• Modelling to quantify the specific effect that these mitigations have on grizzly bears will be conducted and documented in the IS/A. Footprint reduction is expected to benefit this species in terms of habitat quality and quantity. • Following practices in FRO's wildlife mitigation management plan (Teck 2016b) to reduce/eliminate grizzly bear mortality during operations. • Modelling of grizzly bear during the IS/A will include assessment on impacts to habitat and incorporation of feedback from Ktunaxa, including from KNC and Yaq̓it ʔa·knuqƛi 'it.
	Rehabilitate	• Prioritizing grassland and brushland ecosystems and integrating forested ecosystems in the rehabilitation plan for the Project, creating habitat for grizzly bears. • Selecting berry plants to support grizzly bear habitat in reclamation prescriptions and planting. • Designing a reclaimed landform with input from KNC and Yaq̓it ʔa·knuqƛi 'it to support functional grizzly bear habitat, incorporating connectivity, avalanche terrain, and the consideration of cultural and temporal factors.
	Offset	• Closing and reclaiming roads in EVR's Private Lands and Conservation Lands. Road mortality is a major threat to grizzly bear populations because even a few mortality events can have serious consequences for species with low reproductive rates. • In partnership with government, industry and other interested parties, implementing highway and railway fencing/underpass mitigation to address habitat connectivity loss and road/rail mortality, with input from Ktunaxa Nation, including KNC and Yaq̓it ʔa·knuqƛi 'it. • Contributing meaningfully to grizzly bear initiatives including road rehabilitation and crossing structures that reduce the potential for human–grizzly bear conflict in the Elk Valley with input from KNC and Yaq̓it ʔa·knuqƛi 'it considering other human activities in the region in addition to mining. • Contributing to offsetting through support of regional Ktunaxa initiatives that may or may not be centrally focused on Qukin ʔamakʔis. These initiatives would be identified by Ktunaxa and would align with Ktunaxa rights in respect of self determination. Such as supporting the Bringing the Salmon Home initiative to support grizzly bear food supply. • Supporting Elk Valley communities to become Bear Smart.

DPD = Detailed Project Description; KNC = Ktunaxa Nation Council; IS/A = Impact Statement/Application; Bbcm = billion bank cubic metres; EV-CEMF = Elk Valley Cumulative Effects Management Framework

10.1.2 Impacts to Aquatic Environment

Table 10.1-2 relays the results of the post-Readiness Decision review conducted by Teck (now EVR) and the engagement undertaken with KNC and Yaq̓it ʔa·knuqɬi ’it regarding impacts to the aquatic environment that have been identified by Ktunaxa Nation as part of the dispute resolution process, including those asserted by Ktunaxa as potentially extraordinarily adverse. The following actions embedded in the mitigation hierarchy were considered when developing the list of the key mitigations used to address the potential for extraordinarily adverse effects which are presented in the table:

- **Avoidance** - Identification of opportunities to avoid impacts to the aquatic environment, and specifically physical impacts to tributaries, focused on an in-depth review and evaluation of the Project footprint to determine if it could be reduced. Through mine design iterations, EVR sought to make mine adjustments to avoid fish habitat, where possible. Through this review, it was confirmed that the overall footprint is required to implement the Project considering geotechnical constraints and other decisions regarding Project means (Section 4.0), with limited exceptions. Through engagement with KNC, we have worked to collaborate on opportunities to avoid impacts to the aquatic environment through the Project footprint. It was KNC’s preference to categorize the avoidance measures as minimization unless it was demonstrated to be a full avoidance in the tables below.
- **Minimization** - Identification of opportunities to minimize impacts to the aquatic environment focused on evaluating whether spatial and temporal impacts to aquatic VCs could be minimized. Potential reductions to castover dispersal and water consumption were evaluated with the Project design team to reduce impacts to water quantity and quality. Potential use of temporary water storage was evaluated with the Project team to reduce peak discharges and increase discharges during low flow periods. These minimization techniques are expected to reduce potential impacts to flows in the Fording River.
- **Rehabilitation** - Where avoidance and minimization cannot fully address potential residual impacts while maintaining a viable Project design, rehabilitation is an integral part of the mitigation hierarchy. Where feasible, stream and riparian habitat impacts arising from temporary access or construction will be rehabilitated through road deactivation and reclamation of stream and riparian habitat using native substrate, soil and planting prescriptions. This represents an extension of an ongoing program by EVR to rehabilitate unused roads, including some within the Project footprint on Castle Mountain. In addition, EVR will review the area within the upper Fording River to look at completing rehabilitation activities for the benefit of the WCT population, such as rehabilitating culverts or crossings that limit fish migration.
- **Offsetting** - Given predicted residual effects on the aquatic environment that cannot be rehabilitated until the end of mine life, an offset plan will be submitted as part of the IS/A for the Project to mitigate predicted residual impacts to WCT and their habitat. The objective of the offset plan will be to achieve a minimum of no net loss for these VCs with respect to the Project, meeting the requirements of the TISG/AIR and the federal *Fisheries Act*. EVR’s approach to offsetting will consider restoration offsets to restore degraded habitat on fully or partially degraded sites not previously impacted by EVR, enhancing existing habitat to improve productivity, and the creation of new aquatic habitat. Per Fisheries and Oceans Canada’s policy for offsetting adverse effects on fish and fish habitat (DFO 2019), priority will be given to restoring degraded habitat. EVR has undertaken an extensive review of offsetting opportunities in the upper Fording River and the Elk River Valley and has identified a candidate list of offsetting projects that would serve both to offset impacts associated with the FRX Project and support WCT population recovery and success in the upper Fording River, focusing on habitat function and population resilience.

- **Addressing uncertainty** - Although the proposed mitigation provides a plausible means to prevent the potential for extraordinarily adverse effects, there is uncertainty about some aspects of mitigation efficacy and the scale at which it must be implemented. This uncertainty will be addressed through the IS/A process through the development of clear, measurable and time-bound targets, developed in collaboration with the Ktunaxa Nation, including through direct engagement with KNC and Yaq̓it ʔa·knuqƚi ’it, and other potentially affected Indigenous Peoples, and mitigation will be adjusted, if necessary, to achieve outcomes required for the Project (e.g., no net loss of fish habitat, meeting the requirements of the TISG/AIR and the *Fisheries Act*). The offset plan will be accompanied by clear targets and a plan for monitoring and adaptive management.

Table 10.1-2: Potential Effects Identified by the Ktunaxa Nation to be Extraordinarily Adverse and Plausible Mitigations (Aquatic Environment)

Description	Mitigation Hierarchy	Plausible Mitigations Incorporated into the Project
Impacts to surface and groundwater quality associated with contaminant loading	Prevent	• Project design providing for no mine rock storage facility development in the Chauncey Creek watershed. • Per Section 4.7, working to prevent the interaction of non-contact water with the active mining areas (pits, mine rock storage areas, TSF and access roads) through construction of diversions, pipelines or similar facilities and to safely reduce or minimize interaction of non-contact water with mining activities, including evaluation of groundwater interception and modelling to be documented in the IS/A. • The Project has been designed to be amenable to the application of EVR's source control construction techniques as they are currently understood with the inclusion of source control for selenium and sulphate taking into consideration the level of certainty and effectiveness associated with implementing these measures in the Elk Valley. If future technologies are identified and proven through EVR's ongoing research and development, re-evaluating the implementation of source control and other treatment requirements as new information becomes available, and adjusting plans as appropriate and following application for relevant approvals and authorizations working with Ktunaxa, including KNC and Yaq̓it ʔa·knuqƛi 'it, on timing and prioritization. • The Project's current mine design is intended to accommodate source control construction techniques being evaluated through EVR's research and development programs. Although these techniques are not yet proven, the current design may still provide source control benefits through its configuration. Examples include placing mine rock against the original ground, submerging certain mine rock, using bottom-up placement for a large portion of mine rock storage and capping legacy mine rock storage areas that were placed top-down (either by low-permeability or store-and-release cover systems, which can minimize water infiltration and air/oxygen movement through the mine rock). The current design has approximately 90% of the mine rock being constructed or covered by bottom-up construction (i.e., in lifts of 30 m or less).

	Reduce	• Refining the mine design from the July 2021 DPD to the current mine plan, reducing the overall disturbance footprint by 324 ha and the volume of mine rock by 1 Bbcm (Section 4.0).
		• Continuing to evaluate best available technologies to decrease contaminant loading from tailings and/or use of tailings in support of in situ treatment and/or source control.
		• Use of blast hole liner during blasting to reduce potential impact to nitrate constituent.
		• Placing mine rock away from the Fording River, minimizing groundwater interaction.
		• Optimizing backfilling for mine rock storage to support management of water quality for treatment and minimize new disturbance:
		  ○ Placing approximately 84% of the mine rock in backfilled pits or existing disturbance.
		  ○ Three locations were selected for mine rock storage for the Project: the Kilmarnock Creek drainage (which already contains some mine rock within the current C-3 Permitted Mine Area), the Eagle Pit (currently being mined as part of the existing FRO), and the FRX Pit once areas become available for progressive backfilling.
		  ○ Incorporating treatment into the design for the FRX Pit to support management of water quality.
		  ○ Storing mine rock (approximately 57%) upstream of existing treatment (i.e., Kilmarnock, Eagle).
		  ○ Partially submerging mine rock in the FRX Pit following closure, decreasing volume exposed to long-term oxidation and increasing passive removal of target constituents from water in subsurface (selenium and nitrate).
		• Continuing to work with Ktunaxa, including direct engagement with KNC and Yaq̓it ʔa·knuqƛi 'it, to optimize mine rock placement through the assessment.
		• Designing the FRX Pit to include an unmined portion of Castle Mountain to the south-southeast, providing for minimization of pit groundwater flow towards Chauncey Creek during all Project stages.
		• Reducing pit shell depth to stay above the Fording River elevation, resulting in the reduced potential of contact water-groundwater interaction to the Fording River Valley bottom from the FRX Pit.
		• Evaluating how to optimally design or reduce sediment ponds or alternative options for water management to reduce potential for selenium speciation during operation and in closure.
		• Continuing to investigate and implement changes to blasting practices and application of castover management to minimize impacts from fly rock and castover, particularly reduce castover on the east slope of Castle Mountain into the Chauncey Creek drainage or adjacent to culturally sensitive areas. This could include the evaluation of techniques such as of berms, nettings, excavation or blasting techniques, and/or using best achievable technology assessment methods (BC ENV 2024).
		• Developing and implementing a Chauncey Creek Management Plan with input from Ktunaxa Nation, including KNC and Yaq̓it ʔa·knuqƛi 'it.

	Treatment	• Considering the use of phytoremediation such as floating mats of cat-tails for treatment.
		• Undertaking a feasibility study or analysis to assess the potential for secondary/tertiary treatment for phytoremediation.
		• Evaluating sources of mine-influenced contact water that may be influenced by the Project (Kilmarnock Creek drainage, Clode Creek drainage, FRX Pit) to determine the potential for required treatment based on proven technologies (Technology Readiness Level 7 or higher), including:
		  ○ possible available treatment capacity at the FRO-S-AWTF
		  ○ possible addition of treatment capacity at the FRO-S-AWTF
		  ○ possible available treatment capacity at FRO-N SRF
		  ○ possible addition of treatment capacity at FRO-N SRF
		  ○ possible construction of additional treatment facilities (e.g., a new SRF); there are currently two locations where an SRF could be designed into the mine plan (in the north and south halves of the FRX Pit; see Section 4.4.2 on water treatment alternatives where SRFs were determined to be feasible and selected for the Project).
		• Evaluating feasibility (technical and economic) and environmental impacts, including water temperature, of water treatment and water management options.
		• In alignment with the EVWQP, the Project will meet the requirements in the *Environmental Management Act* Permit 107517, including construction/operation of treatment facilities on the timelines specified and achievement of water quality limits. The Project will meet site-specific *Mines Act* C-Permits that were amended to include a condition for an IPA to be submitted to the Chief Inspector.
		• Ongoing monitoring and comprehensive review and adaptation of the mitigation plan to address cumulative effects on water quality, per condition of EVR's existing permits including monitoring programs involving ʔa·knusti.
		• Staging the Project provides an opportunity to improve certainty associated with water treatment activities before moving on to a subsequent stage.
		• Continuing to evaluate additional methods of treatment for other constituents, including the use of the reservoir, anti-scalants, ROHDS, or other technologies, where feasible.
		• Incorporating the Project, including mitigations planned to manage surface water quality and flows, into EVR's EVWQP, including the next iteration of the Regional Water Quality Model Update and IPA; updating monitoring programs related to tracking EVR's progress toward the objectives in the EVWQP to incorporate receiving environment conditions potentially influenced by the Project; and implementing mitigation adjustments as necessary to maintain the mitigation's effectiveness, consistent with EVR's existing adaptive management framework.

	Offset	• Evaluating options of treatment or conservation beyond the Project to consider reductions in cumulative effects from other industries or impacts as an offsetting measure.

Table 10.1-2: Potential Effects Identified by the Ktunaxa Nation to be Extraordinarily Adverse and Plausible Mitigations (Aquatic Environment)

Description	Mitigation Hierarchy	Plausible Mitigations Incorporated into the Project
Impacts to aquatic biota associated with changes to water quality	Avoid	• Measures identified above to prevent water quality effects associated with contaminant loading are expected to avoid surface water quality-related impacts on aquatic biota.
	Minimize Rehabilitate	• Measures identified above to avoid, reduce and treat water quality effects associated with contaminant loading and treat water are expected to minimize surface water quality-related impacts on aquatic biota including monitoring programs involving ʔa·knusti.
	Offset	• Based on changes to water quality and in consideration of the mitigations above, offsetting for aquatic biota in relation to this pathway is not anticipated to be necessary for the FRX Project. This will continue to be evaluated and discussed within the assessment.
Physical impacts to tributaries, with a particular concern identified for Chauncey Creek	Avoid	• Avoiding storage of mine rock in Chauncey Creek drainage. • Avoiding any mine footprint in the Castle Mountain West Unnamed Stream 7 drainage, resulting in avoiding the physical loss of 2,263 m^2 of aquatic habitat and 72.4 ha of riparian habitat. • Continuing EVR's recycling program and evaluating supplemental options to no longer put garbage within mine rock storage areas, including haul truck tires.
	Minimize	• Refining the mine design from the July 2021 DPD to the current mine plan, reducing the overall disturbance footprint by 324 ha and the volume of mine rock by 1 Bbcm (Section 4.0). • Continuing to investigate and implement changes to blasting practices and application of castover management to minimize impacts from fly rock and castover, particularly on the east side of the Project to reduce castover on the east slope of Castle Mountain into the Chauncey Creek drainage or adjacent to culturally sensitive areas. This could include the evaluation of techniques such as of berms, nettings, excavation or blasting techniques and/or using best achievable technology assessment methods (BC ENV 2024). • Developing and implementing a Chauncey Creek Management Plan with input from Ktunaxa Nation, including KNC and Yaq̓it ʔa·knuqƛi 'it.
	Rehabilitate	• Developing a restoration plan that balances the objective of optimizing habitat for species and communities impacted by the Project that are of the highest conservation value or greatest concern to land users and land stewards including potentially affected Indigenous Peoples (referred to as priority ecosystems and include high elevation grasslands and brushlands and old and mature forests). The plan should recognize the limitations and uncertainties associated with reclamation in mountain environments and anticipate the limitations that may be associated with offsetting required after implementation of the restoration plan. • Undergoing engagement within the assessment phase with KNC and Yaq̓it ʔa·knuqƛi 'it including developing more defined mitigations including consideration of end land use goals considering Ktunaxa values, which include re-establishing surface water and creating functionality. • Rehabilitating, where feasible, stream and riparian habitat impacts arising from temporary access or construction through road deactivation and reclamation of stream and riparian habitat using native substrate, soil and planting prescriptions (impacts to streams and riparian habitats will be quantified in the IS/A). • Engaging with Ktunaxa Nation, including direct engagement with KNC and Yaq̓it ʔa·knuqƛi 'it, to collaboratively develop mitigations to be implemented for the Project.
	Offset	• Developing an offset plan with KNC and Yaq̓it ʔa·knuqƛi 'it and submitting it as part of the IS/A. EVR has undertaken an extensive review of offsetting opportunities in the upper Fording River and the Elk River Valley and has identified a candidate list of offsetting projects that would serve both to offset impacts associated with the FRX Project and support WCT population recovery and success in the upper Fording River. • Implementing monitoring programs for effectiveness monitoring involving ʔa·knusti within the offsetting plan and developing these programs with input from Ktunaxa Nation, including KNC and Yaq̓it ʔa·knuqƛi 'it.
Impacts to water flows/water quantity	Avoid	• EVR worked to refine and reduce the Project footprint from the July 2021 DPD in an attempt to avoid impacts to areas along the south and east sides of Castle Mountain. Although impacts were reduced through footprint modification, complete avoidance of all watershed area was not possible because the Project footprint as proposed in this Revised DPD is required to implement the Project (Section 4.0). In consultation with the KNC, mitigation actions to alter the footprint were classified as minimization if complete avoidance was not possible and these actions are therefore detailed under "minimize" in the next row.
	Minimize	• Modifying the mine design from the July 2021 DPD to the current mine plan, resulting in avoidance of certain areas along the south and east sides of Castle Mountain. • Continuing to investigate and implement changes to blasting practices and application of castover management to minimize impacts from fly rock and castover, particularly on the east side of the Project to reduce castover on the east slope of Castle Mountain into the Chauncey Creek drainage or adjacent to culturally sensitive areas. This could include the evaluation of techniques such as of berms, netting, excavation or blasting techniques and/or using best achievable technology assessment methods (BC ENV 2024). Reducing expected dust suppression water usage requirements, resulting in reduced water withdrawals due to the Project. • Implementing a reservoir to store water that is dewatered from the FRX Pit areas and/or from the Kilmarnock Creek watershed, as well as discharge during low flow periods, resulting in reduced impacts to flows in the Fording River during operations. • Sequential filling of the two sides of the FRX Pit, resulting in reduced impacts to flows in the Fording River during closure. • Potential for use of less water in future through new tailings technology including evaluation of use of dewatered tailings. • Continuing to evaluate and implement water reduction measures and leverage those already in place at FRO. • Conducting an environmental flow needs assessment, including in affected reaches of the Fording River, as part of developing the IS/A; continuing to engage with Ktunaxa Nation, including direct engagement with KNC and Yaq̓it ʔa·knuqƛi 'it, throughout the environmental flow needs assessment process to collaboratively develop mitigations for implementation into the Project.
	Rehabilitate	• Rehabilitating, where feasible, mine rock storage areas and temporary construction-related disturbances through road deactivation and reclamation using native substrate, soil and planting prescriptions. • Working with Ktunaxa Nation, including through direct engagement with KNC and Yaq̓it ʔa·knuqƛi 'it, to incorporate Ktunaxa restoration guidelines and perspectives, through Ktunaxa Perspectives on, and Principles for, Reclamation and Restoration in Qukin ʔamakʔis and the Elk Valley (Morris and Candler 2020).
	Offset	• Not anticipated to be needed specifically for water flows/water quantity, although flow-related impacts to WCT habitat may be required (see impacts to WCT below).

Table 10.1-2: Potential Effects Identified by the Ktunaxa Nation to be Extraordinarily Adverse and Plausible Mitigations (Aquatic Environment)

Description	Mitigation Hierarchy	Plausible Mitigations Incorporated into the Project
Impacts to Westslope Cutthroat Trout	Avoid	• Removing the south sediment ponds from the Fording River flood plain avoiding direct footprint impacts to fish-bearing habitat in the Fording River oxbow (1,877 m^2) and lower reach of Castle Mountain West Unnamed Stream 5 (1,536 m^2), as well as riparian habitat impacts (35.9 ha).
	Minimize	• Refining the mine design from the July 2021 DPD to the current mine plan, reducing the overall disturbance footprint by 324 ha and the volume of mine rock by 1 Bbcm (Section 4.0). • Reducing the volume of castover, expected through the implementation of castover management practices, resulting in reduced impacts to flows in Chauncey Creek. • Continuing to investigate and implement changes to blasting practices and application of castover management to minimize impacts from fly rock and castover, particularly to reduce castover on the east slope of Castle Mountain into the Chauncey Creek drainage or adjacent to culturally sensitive areas. This could include the evaluation of techniques such as of berms, nettings, excavation or blasting techniques and/or using best achievable technology assessment methods (BC ENV 2024). • Reducing expected dust suppression water usage requirements through the mine design, resulting in reduced water withdrawals due to the Project. Water withdrawals due to the Project will be quantified in the IS/A. • Implementing a reservoir to store water that is dewatered from the FRX Pit areas and/or from the Kilmarnock Creek watershed, and discharge during low flow periods, resulting in reduced impacts to flows in the Fording River during operations. • Assessing groundwater seepage as part of developing the IS/A and continuing to engage with Ktunaxa Nation, including direct engagement with KNC and Yaq̓it ʔa·knuqƛi ’it, throughout the assessment process to collaboratively develop mitigations to be implemented for the Project. • Sequential filling of the two sides of the FRX Pit, resulting in reduced impacts to temporary flows in the Fording River during closure. • Developing and implementing a Chauncey Creek Management Plan with input from Ktunaxa Nation, including KNC and Yaq̓it ʔa·knuqƛi ’it.
	Rehabilitate	• Developing a restoration plan that balances the objective of optimizing habitat for species and communities impacted by the Project that are of the highest conservation value or greatest concern to land users and land stewards including potentially affected Indigenous Peoples (referred to as priority ecosystems and include high elevation grasslands and brushlands and old and mature forests). The plan should recognize the limitations and uncertainties associated with reclamation in mountain environments and anticipate the limitations that may be associated with offsetting required after implementation of the restoration plan. • Undergoing engagement within the assessment phase with KNC and Yaq̓it ʔa·knuqƛi ’it including developing end land use goals considering Ktunaxa values, which include re-establishing surface water and creating functionality. • Rehabilitating, where feasible, stream and riparian habitat impacts arising from temporary access or construction through road deactivation and reclamation of stream and riparian habitat using native substrate, soil and planting prescriptions. • Quantifying impacts to streams and riparian habitats as part of developing the IS/A and engaging with Ktunaxa Nation, including direct engagement with KNC and Yaq̓it ʔa·knuqƛi ’it, to collaboratively develop mitigations to be implemented for the Project.

	Offset	• Developing an offset plan with KNC and Yaq̓it ʔa·knuqƛi ’it and submitting it as part of the IS/A. EVR has undertaken an extensive review of offsetting opportunities in the upper Fording River and the Elk River Valley and has identified a candidate list of offsetting projects that would serve both to offset impacts associated with the FRX Project and support WCT population recovery and success in the upper Fording River.
		• Implementing monitoring programs, including effectiveness monitoring, involving ʔa·knusti within the offsetting plan and developing these programs with input from Ktunaxa Nation, including KNC and Yaq̓it ʔa·knuqƛi ’it.
		• Contributing to offsetting through supporting Ktunaxa initiatives that may or may not be centrally focused on qukin ʔamakʔis, based on Ktunaxa priorities. These support access to safe foods while other mitigations and offsets for WCT. These initiatives would be identified by Ktunaxa, including KNC and Yaq̓it ʔa·knuqƛi ’it, and would align with Ktunaxa rights in respect of food sovereignty. These may include:
		  ○ Supporting initiatives for Burbot.
		  ○ Contributing to the Bringing the Salmon Home initiative.

Impacts to human health related to changes in water quality and ʔa·kpiɈis (Ktunaxa “favourite food”)	Prevent	• Please see impacts to surface and groundwater quality associated with contaminant loading, impacts to WCT, and impacts to terrestrial habitat and biodiversity overall above.
	Reduce	• Please see impacts to surface and groundwater quality associated with contaminant loading, impacts to WCT, and impacts to terrestrial habitat and biodiversity overall above. • Continuing EVR’s participation in the regional Human Health Risk Assessment required under the regional *Environmental Management Act* Permit 107517, sharing results with Ktunaxa Nation, including KNC and Yaq̓it ʔa·knuqƛi ’it, and providing support for communication materials to community members on monitoring results and maps. • Co-developing and implementing a community-based monitoring and evaluation program with the Ktunaxa Nation, including KNC and Yaq̓it ʔa·knuqƛi ’it, that is rooted in Indigenous knowledge and western science-based approaches (e.g., for water quality, resource quality) and which aims to increase confidence in wild foods harvesting and water quality, and effect on fish tissue and drinking water, working towards continuous improvement for water and food quality and confidence.
	Treat	• Please see impacts to surface and groundwater quality associated with contaminant loading, impacts to WCT, and impacts to terrestrial habitat and biodiversity overall above.
Inability to meet compliance with regulatory requirements and the Boundary Water Treaty	Prevent	• Please see impacts to surface and groundwater quality associated with contaminant loading above.
	Reduce	• Please see impacts to surface and groundwater quality associated with contaminant loading above. • Incorporating the Project, including mitigations planned to manage surface water quality and flows, into the EVWQP, including future iterations of the Regional Water Quality Model Update and IPA, in a compliant configuration to established limits. • Considering further options and outcomes of the International Joint Commission Study Board, when available.
	Treat	• Please see impacts to surface and groundwater quality associated with contaminant loading above.

DPD = Detailed Project Description; TSF = tailings storage facility; SRF = saturated rock fill; FRO-S-AWTF = Fording River Operations South Active Water Treatment Facility; FRO-N SRF = Fording River Operations North Saturated Rock Fill; EVWQP = Elk Valley Water Quality Plan; IPA = Implementation Plan Adjustment; WCT = Westslope Cutthroat Trout; IS/A = Impact Statement/Application; ROHDS = reverse osmosis high-density sludge; TMP = Tributary Management Plan; Bbcm = billion bank cubic metres

10.1.3 Impacts to Ktunaxa Rights

Through engagement with KNC and Yaq̓it ʔa·knuqƛi ’it, Teck (now EVR) has continued to deepen and refine its understanding of Ktunaxa Nation concerns that were identified as part of the dispute resolution process, including potential impacts asserted by Ktunaxa Nation as potentially extraordinarily adverse. Table 10.1-3 and Table 10.1-4 summarize all potential impacts, including cumulative impacts, of the Project on Ktunaxa and Ktunaxa rights that were identified as part of the dispute resolution process, and identify plausible mitigations to address those impacts, including those necessary to resolve KNC and Yaq̓it ʔa·knuqƛi ’it assertions of extraordinarily adverse effects.

The Readiness Decision was issued on February 21, 2023. Since then, EVR and KNC have conducted numerous meetings and workshops in an effort to identify plausible measures to mitigate impacts on Ktunaxa rights. Through engagement and review of the draft Revised DPD, Yaq̓it ʔa·knuqƛi ’it agree that the proposed mitigation measures for effects on Ktunaxa rights are plausible, recognizing that further work will be required during the assessment to confirm their suitability and/or to evaluate whether other plausible mitigations should be implemented for the Project based on the results of the assessment.

KNC has confirmed that staging the FRX Project is an important mitigation to carry forward and will determine if mitigations are plausible after the Revised DPD is submitted and during the readiness phase. EVR recognizes that further work will be required during the environmental assessment to plausible mitigations for the Project based on the results of the assessment.

While KNC has not provided confirmation whether proposed mitigations are plausible, the requirements of the Readiness Decision before submission of the Revised DPD have been met. The mitigation measures set out in the Revised DPD have been identified through collaborative engagement with KNC. In particular, KNC has been engaged and measures to mitigate impacts on Ktunaxa rights have been identified as required. A decision to move to the assessment phase can and should now be made. EVR acknowledges that a decision to move to assessment is not a determination by the EAO about the technical and economic feasibility of those measures. Further work will be required during the environmental assessment on plausible mitigations for the Project based on the results of the assessment.

Table 10.1-3 presents the following key information:

- **Description of the impacts to Ktunaxa rights** - The description of the impacts to Ktunaxa rights column summarizes those potential impacts to Ktunaxa and Ktunaxa rights, including cumulative impacts, where there is a specific linkage of potential Project-related effects to biophysical components of the environment.
- **Mitigation hierarchy** - This column refers to the step in the mitigation hierarchy to which the mitigation applies (i.e., avoid, minimize, rehabilitate, offset).
- **Plausible mitigations identified for related potential effects** - This column cross-references plausible mitigations identified to address terrestrial and aquatic impacts in Table 10.1-1 (terrestrial environment) and Table 10.1-2 (aquatic environment) as they may contribute to addressing potentially extraordinarily adverse impacts to Ktunaxa rights as identified by the Ktunaxa Nation.
- **Other plausible mitigations** - This column identifies plausible mitigation measures that have been identified in addition to mitigation measures described in Table 10.1-1 and Table 10.1-2. These plausible mitigation measures are intended to specifically address potential impacts to Ktunaxa rights as described by Ktunaxa Nation through ongoing engagement between EVR and KNC and Yaq̓it ʔa·knuqƛi ’it.

Table 10.1-3: Potential Effects Identified by the Ktunaxa Nation to be Extraordinarily Adverse and Plausible Mitigations (Ktunaxa Rights linked to Terrestrial and Aquatic Impacts)

Description	Mitigation Hierarchy	Plausible Mitigations Identified for Related Potential Effects (Tables 10.1-1 [terrestrial environment] and 10.1-2 [aquatic environment])	Other Plausible Mitigations
Displacement from Castle Mountain and other lands and waters associated with the Project footprint to support the exercise of Ktunaxa hunting, fishing[(a)], harvesting and plant and mineral gathering. Includes consideration of impacts to preferred transportation routes, hunting areas and habitation areas on Castle Mountain and along adjacent waterways due to loss of largely intact high elevation cultural landscape used for harvesting, hunting and travel, and loss of an estimated 10 km of trails	Avoid	• As noted in Table 10-1, EVR worked to refine and reduce the footprint from the July 2021 DPD in an attempt to avoid impacts. Although impacts were reduced through footprint modification, complete avoidance of Castle Mountain and other lands and waters associated with the Project footprint was not possible because the Project footprint as proposed in this Revised DPD is required to implement the Project (Section 4.0). In consultation with the Ktunaxa, including through direct engagement with KNC and Yaq̓it ʔa·knuqƛi ʾit, mitigation actions to alter the footprint were classified as minimization if complete avoidance was not possible and these actions are therefore detailed in under “minimize” in the next row.	• Avoiding barriers to land access and knowledge of areas significant to Ktunaxa culture. • Supporting the access task group.
	Minimize	• Table 10.1-1 presents mitigations to minimize impacts to terrestrial habitat and biodiversity overall, including minimizing the Project footprint by maximizing use of previously disturbed areas; refining the mine design from the July 2021 DPD to reduce disturbance by 324 ha and mine rock by 1 Bbcm; relocating the south sediment ponds to avoid 20.3 ha of wetland ecosystem, 24.8 ha of grassland, 11.4 ha of brushland and 101.2 ha of mesic forest; investigating and implementing changes to blasting and applying castover management to minimize impacts from fly rock and castover; and collection of seed cones to preserve genetics and promote establishment of blister rust disease-resistant whitebark pine. • Table 10.1-1 also identifies specific mitigations to minimize impacts to red- and blue-listed grassland and brushland ecosystems, bighorn sheep and grizzly bear.	• The staged Project provides opportunity for continued access to the southern portion of Castle Mountain and the Chaucey watershed, outside of the no access boundary. • Engaging with KNC and Yaq̓it ʔa·knuqƛi ʾit to coordinate on a strategy to reduce changes to access due to road closures; this may include collaborative development of a schedule to minimize interference with harvesting and coordinated access through or across the site. • Continuing to investigate and implement changes to blasting practices and application of castover management to minimize impacts from fly rock and castover, particularly on the east side of the Project to reduce castover on the east slope of Castle Mountain into the Chauncey Creek drainage or adjacent to culturally sensitive areas, including evaluation of techniques such as of berms, netting, excavation or blasting techniques and/or using best achievable technology assessment methods (BC ENV 2024). • Providing opportunities to harvest before disturbance to new areas and in reclamation areas. • Promptly re-seeding and/or planting/transplanting after temporary disturbances with culturally appropriate species where possible (e.g., after temporary access roads, lay-downs, drill pads). Natural drainage patterns will also be restored, where possible, following temporary disturbance. • Engaging with KNC and Yaq̓it ʔa·knuqƛi ʾit to collaboratively develop a strategy focused on revegetation of culturally significant species, which may include transplanting or other culturally appropriate methods. • Continuing engagement with the KNC and Yaq̓it ʔa·knuqƛi ʾit on opportunities to mitigate potentially adverse effects identified by the Ktunaxa Nation as the regulatory process progresses and additional information becomes available (e.g., mine design, existing conditions, and assessments). • Through the Cultural Working Group, working to secure access to locations within EVR sites for specific ceremonial purposes for Ktunaxa spiritual leaders. The Cultural Working Group is also pursuing the finalization of a Cultural Management Plan which would both provide EVR access to Ktunaxa cultural knowledge and provide guidance on means by which that knowledge may be utilized within EVR operations. • Executing agreements with Ktunaxa. In addition to the IMBA and Joint Management Agreement, EVR holds interim agreements with three of the four Ktunaxa First Nations which specifically contemplate the identification and pursuit of community priorities and cultural activities. • Exploring opportunities to minimize temporary disturbances, such as the use of mats to access areas in the winter and minimize ground disturbance. • Following the Ktunaxa Forestry Standards Document and working with KNC and Yaq̓it ʔa·knuqƛi ʾit when timber clearing to minimize impacts to wildlife habitat or cultural value areas.
	Rehabilitate	• Table 10.1-1 provides mitigations for terrestrial impacts relating to rehabilitating and optimizing habitat for species and communities impacted by the Project that are of highest conservation value or greatest concern to land users and land stewards, including Ktunaxa Nation citizens, along with plans to address uncertainties. • Table 10.1-1 also identifies specific mitigations to minimize impacts to red- and blue-listed grassland and brushland ecosystems, bighorn sheep and grizzly bear.	• Collaboratively establishing a monitoring program and culturally appropriate measures to evaluate mitigation effectiveness for discussion with KNC and Yaq̓it ʔa·knuqƛi ʾit as an area of priority under the Joint Management Agreement. • Aligning EVR’s reclamation objectives to KNC and Yaq̓it ʔa·knuqƛi standards.
	Offset	• Table 10.1-1 provides mitigations for terrestrial impacts relating to creating and enhancing degraded wetlands at off-site locations along with the potential acquisition of private lands for conservation and offsetting. • Table 10.1-1 also identifies specific mitigations to offset residual impacts to red- and blue-listed grassland and brushland ecosystems, bighorn sheep and grizzly bear.	• Working with KNC and Yaq̓it ʔa·knuqƛi ʾit to identify offsetting opportunities, including consideration of location and function. • Supporting Yaq̓it ʔa·knuqƛi’it and the other Ktunaxa First Nations’s ability to access other intact high elevation cultural landscapes. • Collaborating with the KNC and Yaq̓it ʔa·knuqƛi ʾit to review offsetting effectiveness. • Re-establishing trail network connectivity and/or support trail mapping initiatives. • Contributing to offsetting through support to regional Ktunaxa initiatives that may or may not be centrally focused on Qukin ʔamakʔis. These initiatives would be identified by KNC and Yaq̓it ʔa·knuqƛi ʾit and would align with Ktunaxa rights in respect of self determination.

Table 10.1-3: Potential Effects Identified by the Ktunaxa Nation to be Extraordinarily Adverse and Plausible Mitigations (Ktunaxa Rights linked to Terrestrial and Aquatic Impacts)

Description	Mitigation Hierarchy	Plausible Mitigations Identified for Related Potential Effects (Tables 10.1-1 [terrestrial environment] and 10.1-2 [aquatic environment])	Other Plausible Mitigations
Infringement of Ktunaxa's right to harvest and rely on the water and fish in the Elk Valley downstream of the Project. Includes consideration of impacts to Ktunaxa confidence in wild foods including ʔa·kpiɂis (Ktunaxa "favourite food") and surface drinking water caused by increasing loads of contaminants from mine rock deposition added to water that already does not meet water quality guidelines	Avoid/Prevent	• Table 10.1-2 presents mitigations to avoid impacts to water and fish downstream of the Project, including plans to prevent the interaction of non-contact water with the active mining areas, and retention of the option to incorporate future water quality management technologies if identified and evaluated as appropriate for use on the Project. • Table 10.1-2 identifies avoidance of storage of mine rock in the Chauncey Creek drainage.	• Co-developing and implementing a community-based monitoring and evaluation program with the Ktunaxa Nation, including KNC and Yaq̓it ʔa·knuqƛi 'it, that is rooted in Indigenous knowledge and western science-based approaches (e.g., for water quality, resource quality) and which aims to increase confidence in wild foods harvesting.
	Minimize/Reduce	• Table 10.1-2 identifies mitigations to minimize impacts to water quality through the avoidance of an additional 1 Bbcm of mine rock placement compared to the 2021 DPD; the relocation of the south sediment ponds to avoid impacts to fish habitat; optimized storage of mine rock in previously disturbed areas, pits and locations where water can be managed for treatment and/or management via submersion; maintaining a portion of Castle Mountain in the south and southeast to minimize a pit groundwater flow toward Chauncey Creek; and limiting the Project footprint to help reduce contact water-groundwater interaction. • Table 10.1-2 indicates a reduction in expected dust suppression water usage requirements resulting in reduced water withdrawals due to the Project. • Table 10.1-2 presents mitigations to reduce impacts to flows through reduction in the volume of anticipated castover, controlled release of reservoir stored water and sequential filling of the Project pit, reduction in dust suppression and other operational water requirements.	• The staged Project provides opportunity to limit footprint-related impacts in lower Chauncey Creek until a decision is made to advance to Stage 2 of the Project. • Continuing engagement with KNC and Yaq̓it ʔa·knuqƛi 'it on mitigation measures through the assessment process beyond regulatory requirements for alignment on key concerns.
	Rehabilitate/Treat	• Table 10.1-2 presents mitigations to rehabilitate, where feasible, stream and riparian habitat impacts arising from temporary access and construction and to treat water quality in accordance with the requirements of existing permits and in accordance with EVR's EVWQP.	• Co-developing a management plan for reclamation prescription areas that are rooted both in western science-based approaches and Indigenous knowledge, with monitoring programs involving ʔa·knusti. • Collaborating with KNC and Yaq̓it ʔa·knuqƛi 'it on reclamation to best meet Ktunaxa standards (quality and pace). • Supporting the Bringing the Salmon Home initiative.
	Offset	• Table 10.1-2 identifies EVR's plans for implementation of offset measures that would serve to offset impacts associated with the FRX Project and support WCT habitat recovery and success in the upper Fording River • Table 10.1-1 identified the potential for acquiring private lands for conservation and offsetting.	• Working with KNC and Yaq̓it ʔa·knuqƛi 'it to identify other potential areas they can access for safe harvesting, whether through additional access to EVR-owned lands, acquiring private lands, or other methods. • Collaborating with the KNC and Yaq̓it ʔa·knuqƛi 'it to review offsetting effectiveness. • Contributing to offsetting through support to regional Ktunaxa initiatives that may or may not be centrally focused on Qukin ʔamakʔis. These initiatives would be identified by KNC and Yaq̓it ʔa·knuqƛi 'it and would align with Ktunaxa rights in respect of food sovereignty: ○ Supporting initiatives for Burbot. ○ Contributing to the Bringing the Salmon Home initiative.

a) Mitigations associated with Ktunaxa right to fish and harvest from aquatic ecosystems are addressed in the next row of this table discussing mitigations for infringement of Ktunaxa's right to harvest and rely on the water and fish in the Elk Valley downstream of the Project.

DPD = Detailed Project Description; KNC = Ktunaxa Nation Council; EVWQP = Elk Valley Water Quality Plan; WCT = Westslope Cutthroat Trout; Bbcm = billion bank cubic metres

Table 10.1-4: Potential Effects Identified by Ktunaxa Nation to be Extraordinarily Adverse and Plausible Mitigations (Ktunaxa Rights)

Description	Plausible Mitigations
Interference with and infringement of Ktunaxa stewardship and governance rights including the rights to protect and determine the use of lands and resources in accordance with the Ktunaxa value of ʔa·kxaṁis ḏapi qapsin – all living things	• Staging the Project and requiring that EVR be in compliance with Environmental Assessment Certificate conditions, developed in consultation with KNC and Yaḏit ʔa·knuqƚi ’it, before proceeding on to Stage 2 of the Project allows for intergenerational decision making and can be used to support Ktunaxa stewardship and governance rights regarding land and resource use. • Providing support to KNC and Yaḏit ʔa·knuqƚi ’it to enable application of Ktunaxa stewardship and governance through appropriate avenues. • Providing opportunities to Ktunaxa Nation, including through direct engagement with KNC and Yaḏit ʔa·knuqƚi ’it, to support and contribute to annual reclamation planning and the annual report. • Providing opportunities for ʔa·knusti or KNC and Yaḏit ʔa·knuqƚi ’it to co-monitor water quality, vegetation and wildlife impacted through Project activities. • Engaging with KNC and Yaḏit ʔa·knuqƚi ’it to develop end land use goals. • Providing mentoring opportunities under Ktunaxa Nation technical staff, including through direct engagement with KNC and Yaḏit ʔa·knuqƚi ’it, and EVR staff to build professional capacity. • Proceeding through a robust engagement process to update the Revised DPD, aligned with United Nations Declaration on the Rights of Indigenous Peoples, the *Declaration on the Rights of Indigenous Peoples Act* and the dispute resolution process.
Interference with and infringement of Ktunaxa’s right to maintain a healthy culture through exercise of rights and cultural practices within the Project area, including the elimination of the ability of Ktunaxa to use the FRX Project area for purposes of knowledge and language transmission between generations	• Staging the Project providing opportunity for continued exercise of rights in the southern portion of Castle Mountain, outside of the no access boundary. • Working with the Ktunaxa Nation, including through direct engagement with KNC and Yaḏit ʔa·knuqƚi ’it, to document and protect cultural heritage artifacts on their traditional territory. • Providing funding for cultural mapping studies for preservation and continued education about cultural practices and heritage. • Providing funding for community-driven studies which may include topics such as land use, language, recording oral histories, a cultural heritage study, traditional skills or others. • Updating existing agreements such as the IMBA, or developing new agreements. • Providing additional opportunities to KNC and Yaḏit ʔa·knuqƚi ’it to support Ktunaxa being Ktunaxa on the land (e.g., support for Culture Camps, on the land learning, Ktunaxa language program, Ktunaxa annual harvests, tri-nation gathering, access support for confidence in land use). • Finalizing a Cultural Management Plan providing support to EVR on means by which Ktunaxa cultural knowledge may be utilized within EVR operations, and outlining ways EVR and Ktunaxa Nation can work together on cultural initiatives, including through direct engagement with KNC and Yaḏit ʔa·knuqƚi ’it,.

Table 10.1-4: Potential Effects Identified by Ktunaxa Nation to be Extraordinarily Adverse and Plausible Mitigations (Ktunaxa Rights)

Description	Plausible Mitigations
Interference with and infringement of Ktunaxa's right to ownership of and control of mineral resources, including the right to determine how those resources will be used and the right to benefit from their use	• EVR understands that Ktunaxa is entitled to engage with the Crown in respect of its asserted right to ownership or control of resources. The lifespan of the Project and staging of mining will provide an opportunity to advance discussion with the Crown and, to the extent appropriate, with EVR under new or existing agreements. • Collaborating with KNC and Yaq̓it ʔa·knuqƛi 'it to identify culturally appropriate employment opportunities EVR can support for Ktunaxa community members that align with community values and recognize members' qualifications and knowledge. • Updating benefits sharing agreement with the Ktunaxa Nation with enhancements to support for training, employment and economic participation. • Providing support for educational and training opportunities related to long-term employment that meet the needs of Yaq̓it ʔa·knuqƛi 'it and other Ktunaxa First Nation community members and to provide skills for diverse roles beyond entry-level jobs. • Providing financial support through IMBA, Interim Relationship Agreements and other means to support Ktunaxa community development priorities, including workforce development. • Creating a mine development committee or designated forum with representation from KNC and Yaq̓it ʔa·knuqƛi 'it to discuss future development projects and opportunities. • Supporting the development of a communication tool that shares Project updates, including the socio-economic benefits of the Project, environmental monitoring and work of the Cultural Working Group, with community members. • Recognition and acknowledgment of Yaq̓it ʔa·knuqƛi 'it and other Ktunaxa First Nations and the traditional territory of Ktunaxa in product descriptions and in discussion with customers.
Interference with and infringement of Ktunaxa's relationship with the land, which is central to Ktunaxa identity, culture and way of being	• Providing support to KNC and Yaq̓it ʔa·knuqƛi 'it for Ktunaxa being Ktunaxa on the land (e.g., support for Culture Camps, on the land learning, Ktunaxa language program, Ktunaxa annual harvests, tri-nation gathering, access support for confidence in land use). • Providing support to KNC and Yaq̓it ʔa·knuqƛi 'it to enable application of Ktunaxa stewardship and governance through appropriate avenues. • Providing funding for community-driven studies which may include topics such as land use, language, recording oral histories, a cultural heritage study, traditional skills or others. • Updating existing agreements such as the IMBA, or developing new agreements. • Co-developing and implementing a community-based monitoring and evaluation program with the Ktunaxa Nation, including KNC and Yaq̓it ʔa·knuqƛi 'it, that is rooted in Indigenous knowledge and western science-based approaches (e.g., for water quality, resource quality) and which aims to increase confidence in wild foods harvesting and water quality, and effect on fish tissue and drinking water, and work towards continuous improvement for water and food quality and confidence. • Working with KNC and Yaq̓it ʔa·knuqƛi 'it to identify offsetting opportunities, including considerations of location and function.

DPD = Detailed Project Description; KNC = Ktunaxa Nation Council; IMBA = Impact Management and Benefits Agreement

10.1.4 Integration with EVR's Existing Mitigation Programs

EVR continues to adjust mitigation plans to adapt to new technology and learnings from ongoing monitoring and research programs. If the Project is approved, FRX Project mitigations will be integrated into EVR's existing programs. For example:

- The Project, including mitigations planned to manage surface water quality and flows, would be incorporated into EVR's EVWQP, including the next iteration of the Regional Water Quality Model Update and IPA. Monitoring programs related to tracking EVR's progress toward the objectives in the EVWQP would be updated to incorporate receiving environment conditions potentially influenced by the Project. Mitigation adjustments would be implemented as necessary to maintain the mitigation's effectiveness, consistent with EVR's existing adaptive management framework.
- The Project's calculations of impacts and mitigations to manage terrestrial environment impacts would be integrated into FRO's Biodiversity Management Plan for ongoing accounting of progress toward EVR's commitment to becoming nature positive.
- The fish habitat mitigation plan would be integrated into EVR's existing mitigation programs.
- Actions identified to mitigate potential adverse effects on Ktunaxa rights, including potential extraordinarily adverse effects, would be incorporated into the EVR–Ktunaxa Nation IMBA, along with those plans to monitor and confirm effectiveness and to adapt mitigations where appropriate to achieve objectives.

10.2 Potential Changes to the Environment on Lands Outside BC and Canada and Mitigations

Drainage from the Project footprint consists of a network of relatively small-sized, often ephemeral or intermittent, watercourses that collect runoff from the surrounding terrain. Flows from these watercourses report to the Fording River. The Fording River flows generally south and discharges to the Elk River. The Elk River flows generally southwest and discharges to Koocanusa Reservoir approximately 100 km downstream of the mouth of the Fording River. Koocanusa Reservoir straddles the Canada-US border and is part of the Kootenay (Kootenai) River system.

The Project has the potential to result in changes to water quality as a result of the release of constituents from mining areas (Appendix I) such as mine rock, pit walls and TSFs. The Project is being designed to meet the intent of the ABMP and EVWQP and the site performance objectives outlined in *Environmental Management Act* Permit 107517. Appropriate mitigation will be included either directly as part of the Project or within the regional mitigation planning process to manage impacts to water quality (Section 10.1.2 and Appendix I). The geographic extent of potential impacts to water quality, including the potential for effects on lands outside of BC and Canada, will be evaluated as part of the assessment of the Project. The Project is not expected to have a direct effect on watercourses in Alberta.

The air quality assessment for the Project will evaluate air quality impacts at a local and regional scale. Receptor locations will be identified with input from technical advisors identified for the assessment processes under the IAA and BC EAA, and at locations sufficiently afield to evaluate the geographic and temporal extent of Project-related incremental and cumulative effects. The Project will include implementation of an air quality and dust control plan and will be designed to contribute to EVR's commitments to climate action (Sections 5.4.2 and Appendix I).

The potential for changes to terrestrial wildlife will be evaluated as part of the assessment of the Project. Potential effects will be evaluated by geographic and temporal scales relevant to the terrestrial resources (e.g., the area used by a wildlife population) and will be included in the assessment. The geographic and temporal boundaries for the assessment will be proposed as part of early steps in the assessment process.

10.3 Effects of the Environment on the Project

The Project could be affected by a number of environmental factors from a business perspective and from a physical infrastructure perspective, as described below. This section of the Revised DPD is similar to the provincial and federal IPD documents with minor clarifications.

From the business perspective, the steelmaking coal market will be influenced by global efforts to respond to climate change. Teck (now EVR) completed a climate change scenario analysis in 2019 (Teck 2019) and in 2021 (Teck 2021b) to aid decision making and strategic planning amid shifts in the carbon economy. EVR's steelmaking operations will remain carbon-competitive in a low-carbon economy. Steelmaking coal is a vital ingredient in the production of steel and is essential to ensuring the world has a sufficient supply of steel to build out the infrastructure required to transition to a low-carbon economy. By producing steelmaking coal in BC, the Project would benefit from the province's clean energy infrastructure, with a majority (97%) of the grid electricity coming from renewable resources (ECCC 2023a). Further, the Project would produce high quality steelmaking coal with high coke strength properties that could reduce GHG emissions during steel production when it displaces lower grade steelmaking coal in the market.

Unlike other global producers of steelmaking coal, all of EVR's steelmaking coal mines are currently subject to a carbon tax. As other jurisdictions adopt carbon pricing policies, the cost of production for EVR's customers will increase and may result in an improved position for the Project on the cost curve, contributing to an improved position in the market. Refer to Section 9.1.2 for further discussion of EVR's plans for net zero across all operations by 2050.

From the physical infrastructure perspective, climate change and natural hazards could directly interact with Project facilities and operations. The following environmental factors could lead to environmental effects on the Project's physical infrastructure:

- Warmer and drier climate in summer could lead to more frequent wildfires.
- Higher precipitation, especially in winter including rain-on-snow events, could lead to more frequent flooding.
- Earlier peak spring flow and other potential hydrological changes, such as lower base flows in summer and winter, would need to be accounted for by the Project water management and tailings facilities, and for delivery of instream flow requirements.
- Natural hazards, including seismic, volcanic, avalanche, extreme weather events and fire, would need to be addressed in the design of mine facilities and through the emergency response plan and operational procedures.

EVR has commissioned a study on potential climate change in the vicinity of the Project that will inform the assessment and detailed design for the Project. Risks associated with climate change and natural hazards will be assessed and appropriate mitigations incorporated into Project plans. The Project would also follow FRO's design standards and practices that mitigate these risks. An example of this is FRO's avalanche forecasting, work requirements and rescue procedures.

11.0 Closing

The FRX Project represents mining of a generational deposit of high-quality steelmaking coal that would allow continued operations at EVR's FRO. The Revised DPD builds on the provincial and federal IPD documents, as well as previous July 2021 DPD and Readiness Decision, submitted to satisfy the requirements of the IAA and processes. The IPD documents provided an overview of the Project which was used to engage interested Indigenous Peoples, technical advisors and the public about the Project. Since submission of the IPD and July 2021 DPD, Project planning has advanced to reflect feedback received and the results of evaluation undertaken by EVR for various Project components and activities.

Please provide feedback to the IAAC, the BC EAO or directly to EVR.

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13.0 Glossary

Term	Definition
Aquatic resources	Ecosystems, plants and wildlife living in or frequenting water; occurring or situated in or on water.
Bioaccumulation	The process through which chemicals build up in organisms from sources in food and water.
Biogeoclimatic zone	A large geographic area with a relatively uniform climate, named for the dominant vegetation species.
Biophysical resources	Aspects of the environment relating to living things such as plants and animals and to non-living things such as rocks, soils and water.
Clean coal	Coal that has been processed at the coal processing plant.
Closure	Actions carried out when a mine ceases operations to bring the site to a safe and stable condition for the long term.
Community (plants and animals)	Plant or animal species living in close association or interacting as a unit.
Combined coarse and fine rejects	A waste stream from coal processing, generated by mixing dewatered fine tailings and coarse coal reject from coal processing.
Crown land	All provincial and federal government lands. Provincial parks and public land are examples of provincial crown land.
Cumulative effects	The combined effects of past, present and reasonably foreseeable activities, over time, on people and the environment.
Disturbance	An event that causes a sudden change from the existing pattern, structure and/or composition in an ecological system or habitat.
Ecosystem	An integrated and stable association of living and non-living resources functioning within a defined physical location. A community of organisms and its environment functioning as an ecological unit. For the purposes of assessment, the ecosystem must be defined according to a particular unit and scale.
Emissions	Gases going into the atmosphere (e.g., vehicle exhaust, chemicals).
Ephemeral	A phenomenon or feature that lasts only a short time (e.g., an ephemeral stream is only present for short periods during the year).
Fee simple	Freehold ownership of land; the land is owned completely without limitation or conditions.
Fine tailings	The fine fraction of the waste stream from coal processing, including fine coal and other clay-sized particles.
Footprint	The proposed development area that directly affects the soil and vegetation components of the landscape.
Groundwater	That part of the subsurface water that occurs beneath the water table, in soils and geologic formations that are fully saturated.
Greenhouse gas (GHG)	Any of various gases, especially carbon dioxide, that contribute to trapping the sun's warmth in the Earth's lower atmosphere.
Habitat	The place or environment where a plant or animal naturally or normally lives or occurs.
Hazardous waste	Chemicals or other wastes that are persistent and toxic, with the potential to cause undesirable consequences under certain conditions.
Infrastructure	Basic facilities, such as transportation, communications, power supplies and buildings, which enable an organization, project or community to function.
Lay-down area	An area that has been cleared for the temporary storage of equipment and supplies. Lay-down areas are usually covered with rock and/or gravel to support accessibility and safe manoeuvrability of transport and off-loading of vehicles.
Material handling	Hauling, conveying, loading and unloading of materials such as coal and mine rock.

Term	Definition
Mature forest	Trees established after the last disturbance have matured; a second cycle of shade-tolerant trees may have become established; understories become well developed as the canopy opens up; time since disturbance is generally 80–140 years for most biogeoclimatic units in the Project area except the high elevation Parkland units where it is 80–250 years (RIC 1998).
Mine rock	Unprocessed rock materials that are produced as a result of mining operations.
Mitigation	An activity intended to avoid, control or reduce the severity of adverse physical, biological or socio-economic impacts of an activity.
Old growth forest	Old, structurally complex stands composed mainly of shade-tolerant and regenerating tree species, although older seral and long-lived trees from a disturbance such as fire may still dominate the upper canopy; snags and coarse woody debris in all stages of decomposition typical, as are patchy understories; understories may include tree species uncommon in the canopy, due to inherent limitations of these species under the given conditions; time since disturbance generally >140 years for all biogeoclimatic units in the Project area except the high elevation Parkland units where it is >250 years (RIC 1998).
Overburden	The soil, sand, silt or clay that overlies a mineral deposit and must be removed before mining (material below the soil profile and above the bituminous sand).
Raw coal	Unprocessed coal: coal that is produced from mining operation before processing at the coal processing plant.
Receiving environment	The natural aquatic environment that receives the deposit or discharge of waste from the mine.
Reclamation	The restoration of disturbed land or wasteland to a state of useful capability.
Residual effects	Effects that persist after mitigation has been applied.
Riparian	Terrain, vegetation or a position next to or associated with a stream, flood plain or standing waterbody.
Runoff	The portion of water from rain and snow that flows over land to streams, ponds, or other surface waterbodies. It is the portion of water from precipitation that does not infiltrate into the ground or evaporate.
Soil	The naturally occurring, unconsolidated mineral or organic material at least 10 cm thick that occurs at the Earth’s surface and is capable of supporting plant growth.
Species	A group of organisms that actually or potentially interbreed and are reproductively isolated from all other such groups; a taxonomic grouping of genetically and morphologically similar individuals; the category below genus.
Species at risk	Any species known to be “at risk” after formal detailed status assessment and designation as “Endangered,” “Threatened” or “of Special Concern” in Canada.
Steelmaking coal	A grade of coal used to produce coke, which is a raw material for steelmaking; also known as metallurgical coal or coking coal.
Tailings	A waste stream from coal processing, consisting of water, fine coal, other clay-sized particles, and trace quantities of coal processing chemicals. The term “tailings” used on its own can refer to both combined coarse and fine reject, and fine tailings.
Terrestrial resources	Ecosystems, plants, and wildlife that rely on the land base for their life processes.
Traditional Land Use	Activities involving the harvest of traditional resources such as hunting and trapping, fishing, gathering medicinal plants and travelling to engage in these activities. Traditional resources include plants, animals and mineral resources that are traditionally used by Indigenous Peoples.
Ungulate	Belonging to the former order Ungulata, now divided into the orders Perissodactyla and Artiodactyla, and composed of the hoofed mammals such as horses, cattle, deer, swine, and elephants.
Watercourse	Riverine systems such as creeks, brooks, streams, and rivers.

Term	Definition
Wetland	Land where the water table is at, near or above the surface or that is saturated for a long enough period to promote such features as wet-altered soils and water tolerant vegetation. Wetlands include organic wetlands or peatlands, and mineral wetlands or mineral soil areas that are influenced by excess water but produce little or no peat.
Wildlife	Under the *Species at Risk Act*, wildlife is defined as a species, subspecies, variety or geographically or genetically distinct population of animal, plant or other organism, other than a bacterium or virus that is wild by nature and is native to Canada or has extended its range into Canada without human intervention and has been present in Canada for at least 50 years.

Appendix A: Concordance Table for the Summary of Engagement Received through the Provincial *Environmental Assessment Act* Process

Table A-1: Concordance Table for the Summary of Engagement Received through the Provincial *Environmental Assessment Act* Process

Summary of Engagement			Proponent Response[1]	
Comment Category or Commenting Group	**Comment ID**	**Comment Summary**	**Proponent Response**	**Location in the DPD**
Water quality	SOE-PUB-01	Potential effects on the Elk River, Chauncey Creek, Lake Kookanusa, Kookanusa Reservoir, and the upper Fording River. Concerns were focused around the existing selenium concentrations in these bodies of water and how the potential further increase of selenium concentrations would affect fish and fish habitat and Teck's ability to meet the objectives of the Elk Valley Water Quality Plan and permit requirements related to water quality for existing operations impacting the Elk River.	Concerns raised in relation to water quality effects on the Elk River, Chauncey Creek, Lake Koocanusa/Koocanusa Reservoir, and the upper Fording River are acknowledged in Sections 1.2, 7, 8 and 10 of the Detailed Project Description (DPD). An evaluation of potential water quality effects related to the Project, including those in the context of the regional water quality initiatives, will be included in the assessment for the application. A Project specific water quality mitigation plan will also be developed and provided in the application for the Project. Should the Project be approved, it would be integrated into a subsequent Regional Water Quality Model update and Implementation Plan Adjustment. Water quality mitigations that will be relied on for the assessment will be based on proven best achievable technology. The project specific water quality mitigation plan will also consider an adaptive approach that would allow for incorporation of technology improvements for the Project. Additional information on water quality management is provided in Sections 4.4, 4.7 and 5.3.4 of the DPD. The Tailored Impact Assessment Guidelines / Application Information Requirement (TISG/AIR) will provide a proposed scope for the water quality assessment, and also the assessment of other valued components (VCs) that may be affected by water quality, to be included in the assessment for the Project. The TISG/AIR will be finalized during the process planning phase.	Sections 4.4, 4.7 and 5.3.4 for water quality management planning. Sections 1.2, 7, 8 and 10 for capturing concerns about water quality.
Westslope Cutthroat Trout	SOE-PUB-02	The westslope cutthroat trout populations in the Upper Fording River and Lake Kookanusa are declining including recent indications of high adult fish mortality. Concerns were raised regarding how potential water contaminants from the Castle Project could further contribute to this population trend.	Teck acknowledges concerns related to Westslope Cutthroat Trout (WCT). Information on WCT is provided in Sections 1.2, 9.1 and 9.3.3 of the DPD, and potential interactions of the Project with fish and fish habitat are provided in Section 10 and Appendix I. Teck participates is a multi-stakeholder Initiative to understand the WCT population decline in the upper Fording River (Sections 9.1.2 and 9.1.3). Relevant context on WCT in the upper Fording River will be included in the assessment for the Project. Information about Teck's regional initiatives related to fish and fish habitat and water quality is provided in Section 9.1 of the DPD. Note that while fish in Koocanusa Reservoir are subject to a number of cumulative effects that have changed their community composition in the reservoir over the last several decades, monitoring of westslope cutthroat trout does not document a specific recent decline in WCT in Koocanusa Reservoir (Presser and Naft 2020) and Teck is not aware of high adult fish mortality in this system. See comment response SOE-PUB-01 for discussion on water quality management plan. The TISG/AIR will provide a proposed scope for the water quality assessment, and also the assessment of other VCs that may be affected by water quality, including WCT and their habitat. The TISG/AIR will be finalized during the process planning phase.	Sections 1.2, 9.1, 9.3.3 and 10 and Appendix I

[1] Reference to section numbers have been updated to concord with the Revised DPD, however, the content of the responses (including reference to Teck [Teck Coal Limited], who changed its name to EVR Operations Limited in July 2024) has not been modified to remain consistent with its original intent of responding to preliminary interests identified in the Initial Project Description submitted on March 24, 2020.

Table A-1: Concordance Table for the Summary of Engagement Received through the Provincial *Environmental Assessment Act* Process

Summary of Engagement			Proponent Response[1]	
Comment Category or Commenting Group	**Comment ID**	**Comment Summary**	**Proponent Response**	**Location in the DPD**
Rocky Mountain bighorn sheep and high elevation grasslands	SOE-PUB-03	Potential effects on Rocky Mountain bighorn sheep in the Elk Valley due to impacts on high elevation grasslands, which are critical winter habitat for Rocky Mountain bighorn sheep.	Teck acknowledges the concern related to bighorn sheep and high elevation grasslands and has provided information in Sections 1.2 and 9.3 of the DPD. Potential interactions between the Project and ecosystems, communities and species of conservation concern are identified in Section 10 and Appendix I. Teck participates in environmental initiatives and regulatory processes, such as management of terrestrial effects, and habitat initiatives for bighorn sheep and high elevation grasslands and are discussed in Section 9.1 of the DPD. Teck is undertaking studies related to bighorn sheep and high-elevation grassland habitats and reclamation opportunities. Mapping efforts started in the summer of 2020 will provide additional information related to high elevation and at risk grasslands, in support of developing plans for managing this VC. Habitat assessment efforts should also strengthen the understanding of what habitat components are critical to the local population of bighorn sheep. The draft TISG/AIR will provide a proposed scope for the assessment of the Project on grasslands and bighorn sheep.	Sections 1.2, 9.1. 9.3 and 10 and Appendix I
Climate change	SOE-PUB-04	Carbon dioxide and methane emissions from the Castle Project and how this could affect climate change and the provincial and federal greenhouse gas emission reduction targets.	Teck acknowledges the concern about climate change and has included information in Section 9.1.3. Teck is committed to carbon neutrality across its operations by 2050, which aligns with provincial and federal greenhouse gas emission reduction targets. The assessment of the Project will evaluate the Project's potential carbon dioxide and methane emissions consistent with the Strategic Assessment of Climate Change and related guidelines. Teck will propose the scope of this assessment in the draft TISG/AIR. Refer to Section 5.4.2 of the DPD.	Sections 5.4.2 and 9.1.3
Impacts on First Nations' traditional lands	SOE-PUB-05	Impacts to areas of spiritual, cultural, and archaeological significance as well as current use of resources in the project area and those that may utilize the project area (e.g. wildlife) and how this would affect Indigenous communities.	Teck proposes to engage with the participating Indigenous Peoples to understand their perspective and evaluate potential impacts on areas of spiritual, cultural, and archaeological significance as well as current use of resources in the Project area. Teck also proposes that participating Indigenous nations be engaged on the evaluation and selection of measures to mitigate potential adverse impacts on Indigenous communities. Information is provided in Sections 7 and 10 of the DPD. The approach for assessment of Indigenous interests will be proposed in the draft TISG/AIR.	Sections 7 and 10
Effects on human health	SOE-PUB-06	Potential effects to human health due to impacts on the environment, specifically on water and air quality.	Teck acknowledges the concerns related to potential effects on human health and has included this concern in Section 8 of the DPD, and identified the potential interaction between the Project and human health in Appendix I. The assessment of the Project will include assessment of human health, with consideration of potential Project impacts on water and air quality. The scope of this assessment will be proposed in the draft TISG/AIR.	Section 8 and Appendix I
Loss of recreational areas	SOE-PUB-07	Potential effects on recreational lands and recreational fishing.	Teck acknowledges the concern related to potential effects on recreational lands and recreational fishing and has included this concern in Section 8 and in the potential interactions table in Appendix I of the DPD. Teck proposes to engage with the public and with potentially affected Indigenous People to understand access concerns and assess mitigation options. Teck proposes that the assessment of the Project assess land use including use of recreational lands and recreational fishing and will propose the scope of this assessment in the draft TISG/AIR.	Section 8 and Appendix I
Economic stability	SOE-PUB-08	Potential positive effects of the Castle Project to sustain long-term employment and support the economies of the surrounding communities.	Teck acknowledges the feedback related to positive effects of employment and economic support for local communities and has included this issue in Sections 1.2.2 and 8. Project benefits are also discussed in Section 5.1.4 of the DPD. The intent of the Project is to extend the lifespan, and thus the employment and economic contributions, of the Fording River Operations into the 2070s. Economic and social benefits of the Project will be evaluated during the assessment of the Project. Teck will propose the scope of the socio-economic assessment for the Project in the draft TISG/AIR.	Sections 1.2.2, 5.1.4 and 8

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Summary of Engagement			Proponent Response[1]	
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Sustainability	SOE-PUB-09	Potential positive effects of the Castle Project's proposed reclamation efforts that would be consistent with ongoing efforts for existing mines in the Elk Valley to reclaim and rehabilitate lands impacted by mining. Comments received were regarding Teck's leadership in forward-thinking technologies to mitigate water quality impacts and their commitment to reclamation activities and minimizing overall environmental impacts.	Teck acknowledges the feedback related to positive effects of reclamation and rehabilitation of lands impacted by mining and has included the topic of sustainability in Section 8 of the DPD. Teck is part of ongoing research and development efforts such as reclamation, water treatment, terrestrial cumulative effects, and biodiversity as outlined in Section 9.1 of the DPD. The assessment of the Project will document potential reclamation and rehabilitation efforts and our contribution to sustainability. The scope of this assessment will be proposed in the draft TISG/AIR.	Sections 8 and 9.1
Project design considerations	SOE-TA-01	Identify and describe the best achievable technology options for water quality source control and treatment (e.g., tailings ponds and clean water diversions), pit shell design, tailings management and storage (e.g., coarser coal technologies), and dust control, and consider new techniques such as long strike mining.	Information about Project options for water quality source control and treatment is outlined in Section 4.4 of the DPD. The pit shell is described in Section 4.1. Tailings handling is described in Section 4.5. Dust control is identified as a mitigations strategy for the Project in Appendix I. Mining technique is described in Section 4.2.	Sections 4.1, 4.2, 4.4 and 4.5 and Appendix I
	SOE-TA-02	Request for additional information regarding how the operational sequencing of the Castle Project and use of pre-existing facilities such as waste rock dumps may influence current closure and end land use plans approved for the existing Fording River Operations.	Mine sequencing for the Project is described in Section 5.3. Reclamation planning is described in Section 5.6.	Sections 5.3 and 5.6
Project interactions with the biophysical environment	SOE-TA-03	Ground and surface water quality concerns due to an inability to capture and treat increased inputs of contaminants such as selenium and nitrates. Concerns around potential impacts on westslope cutthroat trout, the Fording and Elk Rivers and their tributaries (e.g., Chauncey Creek), and the Lake Koocanusa watershed.	Project plans for water quality source control and treatment is described in Section 4.4 of the DPD and Teck has identified the Project's potential to interact with water quality, along with potential mitigations, in Appendix I. Development of Project-specific mitigations will consider learnings from regional initiatives such as those described in Section 9.1 .2 of the DPD. The assessment of the Project will consider potential impacts of water quality in the identified water bodies and to other VCs, such as westslope cutthroat trout, that might be affected by changes to water quality. Teck will propose the scope of this assessment in the draft TISG/AIR.	Sections 4.4 and 9.1.2 and Appendix I
	SOE-TA-04	Cumulative impacts on transboundary watersheds leading to effects on fish, wildlife, and human health.	The concern regarding the Project's potential to affect water quality is identified in Section 1.2.2 of the DPD, and the potential for the Project to interact with water quality, fish and human health is identified in Appendix I. The assessment of the Project would evaluate potential cumulative impacts of water quality on fish, wildlife, and human health where the Project has the potential to contribute cumulatively, and will consider the potential for affects to areas outside of BC and/or Canada. Teck will propose the scope of the water quality assessment, including the plan for assessing potential water quality impacts on other VCs that may be affected by changes in water quality, in the draft TISG/AIR.	Section 1.2.2 and Appendix I
	SOE-TA-05	Concerns around ineffective water quality treatment at existing Teck facilities and cumulative effects in the Elk Valley, including non-compliance with the Elk Valley Water Quality Plan.	Information about Teck's participation in regional studies, initiatives and programs to manage water quality and cumulative effects in the Elk Valley is provided in Section 9.1.2. The Project's potential impacts to water quality, along with potential mitigations, are identified in Section 1.2.2 and Appendix I. Teck will propose the scope of the water quality assessment, including accounting for the current state of the environment, in the draft TISG/AIR.	Sections 1.2.2, 9.1.2, and Appendix I
	SOE-TA-06	Concerns that discharges from the Project may increase selenium and nitrate concentrations in the Elk River, resulting in transboundary effects on fish and wildlife in Lake Koocanusa, a waterbody located in both Canada and the US, as well as in the Kootenai River that drains the lake and flows through Montana and Idaho.	Concern about the Project's potential to affect water quality has been included in Section 1.2.2 of the DPD, and potential interactions between the Project and water quality are identified in Appendix I. The assessment of the Project will evaluate potential effects of water quality on fish and wildlife, and will consider the potential for affects to areas outside of BC and/or Canada. Teck will propose the scope of the water quality assessment, including the plan for assessing potential water quality impacts on other VCs that may be affected by changes in water quality, in the draft TISG/AIR.	Section 1.2.2 and Appendix I
	SOE-TA-07	Ground and surface water quantity concerns from water usage at the Castle Project and water seepage, combined with drying effects from climate change.	A description of Project water use is provided in Section 5.7 of the DPD. The Project's potential impacts to ground and surface water quantity, along with potential mitigations, are identified in Appendix I. Teck will propose the scope of the assessment for water quantity, including the plan for how water usage, seepage, and climate change will be addressed, in the draft TISG/AIR.	Section 5.7 and Appendix I

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Summary of Engagement			Proponent Response[1]	
Comment Category or Commenting Group	**Comment ID**	**Comment Summary**	**Proponent Response**	**Location in the DPD**
Project interactions with the biophysical environment (continued)	SOE-TA-08	Concerns around potential impacts on terrestrial wildlife and plant species at risk, including Rocky Mountain bighorn sheep, high elevation grasslands and brushlands, white bark pine and limber pine.	Concerns about potential Project-related impacts to high elevation grasslands and bighorn sheep are identified in Sections 1.2.2 and 8 of the DPD. Information on terrestrial cumulative effects and management in the Elk Valley is presented in Section 9.1.2. The Project's potential impacts on terrestrial resources, along with potential mitigations, is identified in Section 10 and Appendix I. The assessment of the Project would include a terrestrial assessment that includes wildlife and vegetation species at risk such as bighorn sheep, grasslands, brushlands and whitebark pine. Limber pine has not been found in the Project area, but it will be included in the assessment if found. Teck plans to identify these species as candidate VCs for assessment of the Project and will propose the scope of the assessment for wildlife and plant species and communities of conservation concern in the draft TISG/AIR.	Sections 1.2.2, 8, 9.1.2 and 10 and Appendix I
	SOE-TA-09	Air quality concerns including increased dust emissions and potential impacts on ecosystem health and function from dust as well as greenhouse gas emissions.	Information about Project air emissions and GHGs is provided in Section 5.4.2, and concerns about greenhouse gas emissions are acknowledged in Section 9.1.3 of the DPD. The Project's potential impacts to air quality, including greenhouse gases, along with potential mitigations, is identified in Appendix I. Teck will propose the scope of the air quality assessment including the proposed plan for addressing potential air quality, dust impacts and greenhouse gas emissions, in the draft TISG/AIR. In proposing this assessment, Teck is considering the BC EAO's guidance on assessing ecosystem function.	Sections 5.4.2 and 9.1.3 and Appendix I
Project interactions with the human environment	SOE-TA-10	Human health concerns resulting from impacts to drinking water due to increased selenium and nitrates, from increased dust emissions, from increased noise, and from impacts to traditional foods due to changes in water and air quality.	Concerns related to human health due to Project-related impacts to water quality and air quality, along with Project actions, are identified in Section 8 of the DPD. The Project's potential to interact with health, along with potential mitigations, is also identified in Appendix I. The assessment of the Project would include a human health assessment that considers potential Project-related changes to drinking water, dust, noise, and traditional foods. Teck will propose the scope of the human health assessment in the draft TISG/AIR.	Section 8 and Appendix I
	SOE-TA-11	Concerns that the project would differentially impact marginalized groups of people due to addition of direct/indirect jobs in the area.	The Project's potential impacts to economic, social and health conditions, along with potential mitigations and enhancements, is identified in Appendix I of the DPD. As indicated in Section 9.4.1, Teck intends to consider the potential for differential impacts to different groups of people following federal GBA+ guidance. Teck will propose the scope of the economic, social and health assessment in the draft TISG/AIR.	Section 9.4.1 and Appendix I
	SOE-TA-12	Concerns around maintaining local employment, training opportunities, and local suppliers to ensure sustainable economic development and community wellbeing.	The Project's potential interactions with economic and social conditions, along with potential mitigations and enhancements, is identified in Appendix I of the DPD. The assessment for the Project would include a socio-economic assessment that includes evaluating potential local employment, training opportunities, and local suppliers. Teck will propose the scope of this assessment in the draft TISG/AIR.	Appendix I
	SOE-TA-13	Potential impacts on local viewscapes/visual aesthetics from mining at Castle Mountain.	The Project's potential interactions with social conditions (including visual aesthetics), along with potential mitigations and enhancements, is identified in Appendix I of the DPD. The assessment for the Project would include an assessment of social conditions, including consideration of visual aesthetics. Teck will propose the scope of this assessment in the draft TISG/AIR.	Appendix I

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Summary of Engagement			Proponent Response[1]	
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Permitting considerations	SOE-TA-14	Need for appropriate water quantity data collection, hydrology study, environmental flow need study or update, and monitoring program development to support water licence applications or amendments.	The provincial permits anticipated for the Project are described in Section 6.4. Studies to support the Project assessment are listed in Appendix E. To the extent feasible at this early stage, the studies have been designed to also support permitting information needs. Further discussion on this topic is proposed as part of the regulatory coordination and/or permitting plans to be developed for the assessment of the Project, assuming that a decision is made that the Project proceed through the remaining phases of the assessment process under the BC EAA and IAA.	Section 6.4 and Appendix E
	SOE-TA-15	Need to include references to the Public Health Act [SBC 2008] C. 28, the Sewerage System Regulations BC Reg. 191/2018, and the Drinking Water Protection Act [SBC 2001] C. 9.	Reference to the *Public Health Act* has been added to Table 6.4-1 of the DPD. The Project is not expected to require authorization under the *Drinking Water Protection Act* as no change to the drinking water supply for the Project is proposed (Castle workers drinking water to be supplied by bottled water consistent with current practice at FRO).	Section 6.4 (Table 6.4-1)
	SOE-TA-16	Requests for clarification around the connection between existing Fording River Operations and the proposed Castle Project, including the Castle Project's potential implications to existing permits and authorizations at Fording River Operations.	Additional information on the history and status of the Project is presented in Section 1.2 of the DPD. A description of mine sequencing, which will improve the understanding of connection between existing FRO operations and the proposed FRX Project, is provided in Section 5.3. Information about the potential permitting process is provided in Section 6. Permitting requirements will be addressed later in the assessment process.	Sections 1.2, 5.3 and 6
	SOE-TA-17	Requests that Teck provide greater clarity around how the Castle Project may impact existing facilities and infrastructure and indicate whether revision of approved plans under permits such as Mines Act C-3 may require amendment in the event the Castle Project is approved.	Information about the potential permitting process is provided within Section 6.4, including a list of the existing permits that may require amendment (Table 6.4-1).	Section 6.4 (Table 6.4-1)
Ktunaxa Nation	SOE-KNC-01	Concerns regarding the adverse cultural and environmental impacts of the Castle Project to cause extraordinarily adverse effects on the Ktunaxa Nation and Ktunaxa Indigenous rights.	This concern is reflected in Section 10.1.3 of the DPD, along with Teck's regional and Project actions focused on addressing concerns to Ktunaxa's Indigenous rights and interests. Teck is interested in continuing to work collaboratively with the Ktunaxa Nation Council (KNC) in support the developing the Project in an environmentally and economically responsible manner. Teck notes the use of "extraordinary effects" and is interested in continuing to work with the Ktunaxa Nation to understand their concerns and the potential for effects on their rights and interests. The draft TISG/AIR will propose an approach to the assessment in the draft TISG/AIR. In preparing for the assessment, several receptor locations have been identified by KNC based on existing Ktunaxa use and occupancy information, such as habitation values (camp or cabin), an important trail, and Indigenous rights practice (Morris 2020).	Section 10.1.3
	SOE-KNC-02	Interests in further information and understanding regarding progress on reclamation and restoration efforts, improvements to water quality, commitments on anticipated environmental performance of the Castle Project, current and future environmental performance of existing mines and a better understanding of the justification of the Castle Project, in relation to existing permits.	This concern is reflected in Sections 7.1 and 10.1 of the DPD. Tables 10.1-1 and 10.1-2 also relay Teck's regional and Project actions that are focused on addressing this topic. Teck proposes to continue to work with KNC to share information and understanding on these topics as they relate to the Project.	Sections 7.1 and 10.1
	SOE-KNC-03	Concerns regarding cumulative effects and existing displacement of Ktunaxa practices, including into the Castle Project area, due to disturbance caused by existing coal mines, mine exploration and other industrial and non-industrial activities. Existing level of displacement intensifies the importance of the Castle Project area for use and stewardship.	This concern is reflected in Sections 7.1 and 10.1-3 of the DPD. Tables 10.1-3 and 10.1-4 also relay Teck's regional and Project actions that are focused on addressing this topic. As noted above, Teck is working collaboratively with the Ktunaxa Nation to understand impacts of the Project on Ktunaxa rights and interests. Teck intends to outline the proposed approach to this assessment in the draft TISG/AIR.	Sections 7.1 and 10.1-3
	SOE-KNC-04	Interests in the unique and regionally important environmental features located within the Castle Project footprint, including critical ungulate and sheep habitat.	This concern is reflected in Sections 7.1 and 10.1.1 of the DPD. Table 10.1-1 also relays Teck's regional and Project actions that are focused on addressing impacts to ecosystems and plant and animal species of cultural importance and/or conservation concern, and their habitat. This comment has been incorporated into Teck and KNC's discussions of the VCs to be assessed for the Project. Teck will propose the scope of the assessment to terrestrial resources, including wildlife and their habitat, in the draft TISG/AIR.	Sections 7.1 and 10.1.1

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Ktunaxa Nation (continued)	SOE-KNC-05	Concerns and lack of information regarding the Castle Project's potential inconsistency with Ktunaxa's formal and informal planning goals and objectives for the Castle Project area, as the Castle Project would extend the spatial and temporal disruption of Ktunaxa practices in Qukin ʔamakʔis for generations.	This concern is identified in Sections 9.4.1.3 and 10.1.3 of the DPD. Teck is interested in further discussion with KNC about Ktunaxa's formal and informal planning goals and objectives for the Elk Valley, and how those topics of interest are relevant to regional initiatives and those relevant to the Project. Teck proposes further discussion with KNC on opportunities for integration and alignment on mutually beneficial goals, values and objectives, as information becomes available.	Sections 9.4.1.3 and 10.1.3
	SOE-KNC-06	Interests in ecosystems of conservation interest, including wetland, riparian and floodplains ecosystems, avalanche path ecosystems, karst ecosystems, old growth forests and mature forests, grassland and brushland ecosystems and all listed ecological communities.	This concern is identified in Sections 7.1 and 10.1.1 of the DPD. Table 10.1-1 also relays Teck's regional and Project actions that are focused on addressing effects to ecosystems and plant and animal species of cultural importance and/or conservation concern, including those identified in the comment. This comment has been incorporated into Teck and KNC's discussions of the VCs to be assessed for the Project, and each has been identified in the list of candidate VCs that Teck will incorporate into the draft TISG/AIR. Teck will propose the scope of the assessment to terrestrial resources, including ecosystems and species of conservation concern, in the draft TISG/AIR.	Sections 7.1 and 10.1.1
	SOE-KNC-07	Interests in the protection and rehabilitation of tributaries, a limited ecosystem with the Elk Valley due to the “valley fill” mining method. Permanent protection of tributaries would include conservation of existing ecological state of aquatic and riparian habitats without any detriment to cultural values or the exercise of rights, title and interests, or degradation of ecosystem structure, function or composition.	This concern is identified in Sections 7.1 and 10.1.2 of the DPD. Table 10.1-2 also relays Teck's regional and Project actions that are focused on addressing this topic. This comment has been incorporated into Teck and KNC's discussions of the VCs to be assessed for the Project. The assessment of the Project will include potential impacts to tributaries, including Chauncey and Kilmarnock creeks. The scope of the assessment of aquatic resources, to be captured through various aquatic VCs, will be proposed in the draft TISG/AIR.	Sections 7.1 and 10.1.2
	SOE-KNC-08	Interests in preferred areas for practice of Ktunaxa rights in the Castle Project footprint, including hunting, habitation and transportation (foot and horse trails) and the importance of these activities in connecting to a broader Ktunaxa cultural landscape that supports deep past, current and future Ktunaxa connections with the land and resources.	This concern is identified in Sections 7.1 and 10.1-3 of the DPD. Tables 10.1-3 and 10.1-4 also relay Teck's regional and Project actions that are focused on addressing this topic. As part of preparing for the assessment, several receptor locations have been identified by KNC based on existing Ktunaxa use and occupancy information, such as habitation values (camp or cabin), an important trail, and Indigenous rights practice (Morris 2020). Teck proposes to outline the approach for conducting the Indigenous interests assessment in the draft TISG/AIR.	Sections 7.1 and 10.1.3
	SOE-KNC-09	Interests in water, an overarching concern for the Ktunaxa, as water influences all aspects of Ktunaxa assessment including social, education and employment, traditional knowledge and language, economic and land and resources and Ktunaxa Nation Indigenous rights and traditions rely on water and its flow, which are central to life and sacred. Interests and concerns regarding water quality, westslope cutthroat trout and fish habitat.	The generally identified the concern about water, including water quality and westslope cutthroat trout and fish habitat, is identified in Sections 7.1 and 10.1 of the DPD. Tables 10.1-2 and 10.1-3 also relay Teck's regional and Project actions that are focused on addressing this topic. As well, this comment has been incorporated into discussions between Teck and the KNC regarding the VCs to be assessed for the Project. As part of these discussions, KNC has offered to share their proposed framework for assessing impacts to water from a Ktunaxa perspective.	Sections 7.1 and 10.1
	SOE-KNC-10	Interests in birds, including the Woodpecker Guild, which is culturally important based on Ktunaxa creation story and an important keystone species (8 species), and the Migratory Raptor Guild, which has specific cultural importance tied to Qukin ʔamakʔis, and the American dipper, which has a strong link between aquatic-riparian health and wildlife-habitat impact pathways.	Teck has included the concerns about birds, including woodpeckers, migratory raptors and American dipper, in Sections 7 and 10.1.1 of the DPD. Table 10.1-1 also relays Teck's regional and Project actions that are focused on addressing this topic. As well, this comment has been incorporated into discussions between Teck and the KNC regarding the VCs to be assessed for the Project and each of the identified species/guilds will be included in the candidate VCs list that Teck will include in the draft TISG/AIR. Teck will propose the scope of the assessment to terrestrial resources, including the assessment of the birds/bird guilds, in the draft TISG/AIR.	Sections 7 and 10.1.1
	SOE-KNC-11	Interests in wildlife, including moose, as the Castle Project area is important to maintain connectivity with populations in Alberta and to maintain seasonal movements, and Rocky Mountain bighorn sheep and elk, as migratory movement corridors for these species are critically important as are seasonal habitats.	Teck has identified the concerns about wildlife and their habitat and movement corridors in Sections 7.1 and 10.1 of the DPD. Table 10.1-1 also relays Teck's regional and Project actions that are focused on addressing this topic. As well, this comment has been incorporated into discussions between Teck and the KNC regarding the VCs to be assessed for the Project. Teck will propose the scope of the assessment for terrestrial resources, including assessment of the Projects effects on wildlife movement and movement corridors for VCs to be assessed for the Project, in the draft TISG/AIR.	Sections 7.1 and 10.1

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Kainai (Blood Tribe)	SOE-Kainai-01	Concerns regarding direct, indirect and cumulative impacts on the ability to exercise Aboriginal rights and traditional land uses in and around the Project area, along with direct, indirect and cumulative on the ability to practice its Treaty rights within Alberta.	Teck acknowledges the interests expressed by the Kainai Nation and has included this information in Section 7.7 of the DPD. Teck proposes to engage with Kainai Nation, the BC EAO and the IAAC to better understand Kainai's interests and how they will interact with the Project and assessment process being undertaken for the Project. Teck proposes to outline the approach for conducting the Indigenous interests assessment in the draft TISG/AIR.	Section 7.7
	SOE-Kainai-02	Concerns regarding the Castle Project's interference with legal, spiritual, and cultural practices, which form an integral part of governance.	Teck acknowledges the interest expressed by the Kainai Nation regarding potential impacts to legal, spiritual and cultural practices, as identified in Section 7.7 of the DPD. Teck proposes to engage with Kainai Nation, the BC EAO and the IAAC to better understand Kainai's interests and how they will interact with the Project and assessment process being undertaken for the Project. Teck will outline a proposed approach to conducting the Indigenous interests assessment in the draft TISG/AIR.	Section 7.7
	SOE-Kainai-03	Concerns regarding the Castle Project's direct, indirect and cumulative impacts, on Kainai's sense of place, way of life, and ability to pass down culture from generation to generation.	Teck acknowledges the interest expressed by the Kainai Nation regarding potential impacts to Kainai's sense of place, way of life, and ability to pass down culture from generation to generation, as identified in Section 7.7 of the DPD. Teck proposes to engage with Kainai Nation, the BC EAO and the IAAC to better understand Kainai's interests and how they will interact with the Project and assessment process being undertaken for the Project. Teck will outline a proposed approach to conducting the Indigenous interests assessment in the draft TISG/AIR.	Section 7.7
	SOE-Kainai-04	Concerns regarding the Projects impact on Kainai's ability to harvest plants for food, medicinal and ceremonial purposes, including stems, leaves, roots and berries.	Teck acknowledges the interest expressed by the Kainai Nation regarding potential impacts to on Kainai's ability to harvest plants for food, medicinal and ceremonial purposes, as identified in Section 7.7 of the DPD. The assessment of the Project will consider potential effects to ecosystems and plant species. Teck proposes to engage with the Kainai Nation, the BC EAO and the IAAC to better understand Kainai's interests and how they will interact with the Project and assessment process being undertaken for the Project. Teck will outline a proposed approach to conducting the Indigenous interests assessment in the draft TISG/AIR.	Section 7.7
	SOE-Kainai-05	Concerns regarding the Castle Project's impacts to camping and gathering sites of cultural, spiritual and historic importance, which are important for the transmission of traditional culture, knowledge and law.	Teck acknowledges the interest expressed by the Kainai Nation regarding potential impacts to camping and gathering sites, as identified in Section 7.7 of the DPD. Teck proposes to engage with Kainai Nation, the BC EAO and the IAAC to better understand Kainai's interests and how they will interact with the Project and assessment process being undertaken for the Project. Teck will outline a proposed approach to conducting the Indigenous interests assessment in the draft TISG/AIR.	Section 7.7
	SOE-Kainai-06	Concerns regarding potential impacts to uses of a parcel of land near Coleman, Alberta, about 60 km from the Project, which is used as a base to support Kainai members' exercise of Treaty rights and traditional land uses in the Crowsnest Pass region.	Teck acknowledges the interest expressed by the Kainai Nation regarding potential impacts too uses of a parcel of land near Coleman. Teck anticipates that there will be no direct Project impacts on the identified parcel of land. Teck proposes to engage with Kainai Nation, the BC EAO and the IAAC to better understand Kainai's interests and how they will interact with the Project and assessment process being undertaken for the Project. Teck will outline a proposed approach to conducting the Indigenous interests assessment in the draft TISG/AIR.	Section 7.7
	SOE-Kainai-07	Concerns regarding the Project's impacts to Kainai's hunting rights, including hunting practices of elk, mule deer, bighorn sheep (a species of cultural importance), moose and occasionally bear.	Teck acknowledges the interest expressed by the Kainai Nation regarding potential impacts to Kainai's hunting rights, as identified in Section 7.7 of the DPD. Teck proposes to engage with Kainai Nation, the BC EAO and the IAAC to better understand Kainai's interests and how they will interact with the Project and assessment process being undertaken for the Project. Teck will outline a proposed approach to conducting the Indigenous interests assessment in the draft TISG/AIR.	Section 7.7

Table A-1: Concordance Table for the Summary of Engagement Received through the Provincial *Environmental Assessment Act* Process

Summary of Engagement			Proponent Response[1]	
Comment Category or Commenting Group	**Comment ID**	**Comment Summary**	**Proponent Response**	**Location in the DPD**
Kainai (Blood Tribe) (continued)	SOE-Kainai-08	Concerns regarding the Project's impacts to environmentally sensitive habitats, including westslope cutthroat trout habitat.	Teck acknowledges the interest expressed by the Kainai regarding potential impacts to environmentally sensitive habitats, including westslope cutthroat trout habitat, as identified in Section 7.7 of the DPD. The assessment of the Project will also consider effects to environmentally sensitive areas, including westslope cutthroat habitat, as identified in Section 10 and Appendix I. Teck proposes to engage with Kainai Nation, the BC EAO and the IAAC to better understand Kainai's interests and how they will interact with the Project and assessment process being undertaken for the Project. Teck will outline a proposed approach to conducting the Indigenous interests assessment in the draft TISG/AIR.	Sections 7.7 and 10 and Appendix I
	SOE-Kainai-09	Concerns regarding the Project's potential impacts to Bighorn sheep populations, as the project location contains the highest density of sheep within the region. The Project may impact Bighorn sheep wintering range and some of the bighorn sheep that rely on winter range in the Project area may travel into Alberta, thus impacting Alberta populations. Impacts to bighorn sheep may have corresponding impacts on treaty right to hunt bighorn sheep. Kainai has interests in in participating in studying impacts to bighorn sheep.	Teck acknowledges the interest expressed by the Kainai Nation regarding potential impacts to bighorn sheep, as identified in Section 7.7 of the DPD. The assessment of the Project will consider effects to wildlife, including bighorn sheep and their habitat, as identified in Section 10.1.1 and Appendix I. Teck proposes to engage with Kainai Nation, the BC EAO and the IAAC to better understand Kainai's interests and how they will interact with the Project and assessment process being undertaken for the Project. Teck will outline a proposed approach to conducting the Indigenous interests assessment in the draft TISG/AIR.	Sections 7.7 and 10.1.1 and Appendix I
	SOE-Kainai-10	Concerns regarding the Project increasing disturbance of land in Kainai's traditional territory which could result in reduced harvesting areas and removal of plants and wildlife. This area is one of the few remaining areas within Kainai's territory that hasn't been taken up or disturbed – it is thus one of the few remaining areas where Kainai can continue to practice its rights.	Teck acknowledges the interest expressed by the Kainai Nation regarding potential impacts to Kainai's traditional territory and associated reduction in harvesting areas, as identified in Section 7.7 of the DPD. Teck proposes to engage with Kainai Nation, the BC EAO and the IAAC to better understand Kainai's interests and how they will interact with the Project and assessment process being undertaken for the Project. Teck will outline a proposed approach to conducting the Indigenous interests assessment in the draft TISG/AIR.	Section 7.7
	SOE-Kainai-11	Interests in protection of wildlife habitat, migratory birds and fish and fish habitat.	Teck acknowledges the interest expressed by the Kainai regarding protection of wildlife habitat, migratory birds, fish and fish habitat, as identified in Section 7.7 of the DPD. The assessment of the Project will consider effects to wildlife habitat, migratory birds and fish and fish habitat, as identified in Appendix I. Teck proposes to also engage with Kainai Nation, the BC EAO and the IAAC to better understand Kainai's interests and how they will interact with the Project and assessment process being undertaken for the Project. Teck will outline a proposed approach to conducting the Indigenous interests assessment in the draft TISG/AIR.	Section 7.7 and Appendix I
	SOE-Kainai-12	Concerns regarding the Project's impacts on water and air quality. In particular, the Project may contribute to water contamination, particularly as a result of selenium. These impacts may in turn decrease Kainai's confidence in the resources in and around the area that support the practice of its rights.	Teck acknowledges the interest expressed by the Kainai Nation regarding potential Project impacts on water and air quality, as identified in Section 7.7 of the DPD. The assessment of the Project will consider effects to water and air quality, as identified in Section 10 and Appendix I. Teck proposes to engage with Kainai Nation, the BC EAO and the IAAC to better understand Kainai's interests and how they will interact with the Project and assessment process being undertaken for the Project. Teck will outline a proposed approach to conducting the Indigenous interests assessment in the draft TISG/AIR.	Sections 7.7 and 10 and Appendix I
	SOE-Kainai-13	Concerns with respect to the Projects contribution to existing and future cumulative effects, as the Castle Project is one of six new mine projects being considered in addition to the five already existing mines.	Teck acknowledges the interest expressed by the Kainai Nation regarding potential Project cumulative impacts as identified in Section 7.7 of the DPD. The assessment of the Project will consider cumulative effects as identified in Section 10 and Appendix I. Teck proposes to engage with Kainai Nation, the BC EAO and the IAAC to better understand Kainai's interests and how they will interact with the Project and assessment process being undertaken for the Project. Teck will outline a proposed approach to conducting the Indigenous interests assessment in the draft TISG/AIR.	Sections 7.7 and 10 and Appendix I

Table A-1: Concordance Table for the Summary of Engagement Received through the Provincial *Environmental Assessment Act* Process

Summary of Engagement			Proponent Response[1]	
Comment Category or Commenting Group	**Comment ID**	**Comment Summary**	**Proponent Response**	**Location in the DPD**
Kainai (Blood Tribe) (continued)	SOE-Kainai-14	Interests in further understanding of the Castle Project's impacts to facilitate informed decision making, including collecting information on: • Traditional land uses use of the Castle Project area; • Conditions and resources needed to support practice of rights; • Impacts on water quality in and around the Castle Project area; • Impacts of the Castle Project on wildlife, particularly, on bighorn sheep; • Assessment of the impacts of the Castle Project on Kainai's rights; and • The ways in which Teck's existing mines have already impacted wildlife populations, water quality and other resources in the surrounding area; through existing monitoring data with respect to the impact Teck's current operations are having on these resources to help inform understanding of the impacts of the Castle Project.	Teck acknowledges the interest expressed by the Kainai regarding further understanding of potential Project impacts through collection of information. Teck proposes to engage with Kainai Nation, the BC EAO and the IAAC to better understand Kainai's interests and how they will interact with the Project and assessment process being undertaken for the Project.	Section 7.7
Siksika Nation	SOE-Siksika-01	Concerns regarding direct, indirect and cumulative impacts on the ability to exercise Aboriginal rights and traditional land uses in and around the Project area, along with direct, indirect and cumulative on the ability to practice its Treaty rights within Alberta.	Teck acknowledges the interest expressed by the Siksika Nation regarding potential impacts to ability to exercise Aboriginal rights and traditional land uses in and around the Project area and Alberta, as identified in Section 7.6 of the DPD. Teck proposes to engage with Siksika Nation, the BC EAO and the IAAC to better understand Siksika's interests and how they will interact with the Project and assessment process being undertaken for the Project. Teck will outline a proposed approach to conducting the Indigenous interests assessment in the draft TISG/AIR.	Section 7.6
	SOE-Siksika-02	Concerns regarding interference with Siksika legal, spiritual, and cultural practices, which form an integral part of Siksika governance.	Teck acknowledges the interest expressed by the Siksika Nation regarding potential impacts to legal, spiritual and cultural practices, as identified in Section 7.6 of the DPD. Teck proposes to engage with Siksika Nation, the BC EAO and the IAAC to better understand Siksika's interests and how they will interact with the Project and assessment process being undertaken for the Project. Teck will outline a proposed approach to conducting the Indigenous interests assessment in the draft TISG/AIR.	Section 7.6
	SOE-Siksika-03	Concerns regarding the Castle Project's direct, indirect and cumulative impacts, on Siksika's sense of place, way of life, and ability to pass down culture from generation to generation.	Teck acknowledges the interest expressed by the Siksika Nation regarding potential impacts to Siksika's sense of place, way of life, and ability to pass down culture from generation to generation, as identified in Section 7.6 of the DPD. Teck proposes to engage with Siksika Nation, the BC EAO and the IAAC to better understand Siksika's interests and how they will interact with the Project and assessment process being undertaken for the Project. Teck will outline a proposed approach to conducting the Indigenous interests assessment in the draft TISG/AIR.	Section 7.6
	SOE-Siksika-04	Concerns regarding the Projects impact on Siksika's ability to harvest plants for food, medicinal and ceremonial purposes, including stems, leaves, roots and berries. This includes the materials that are utilized in the Horn Society, and Beaver Bundle and the Thunder Medicine Pipe bundle, and other Siksika Societies.	Teck acknowledges the interest expressed by the Siksika Nation regarding potential impacts to on Siksika's ability to harvest plants for food, medicinal and ceremonial purposes, as identified in Section 7.6 of the DPD. The assessment of the Project will consider potential effects to ecosystems and plant species. Teck proposes to engage with Siksika Nation, the BC EAO and the IAAC to better understand Siksika's interests and how they will interact with the Project and assessment process being undertaken for the Project. Teck will outline a proposed approach to conducting the Indigenous interests assessment in the draft TISG/AIR.	Section 7.6
	SOE-Siksika-05	Concerns regarding the Castle Project's impacts on Siksika's ability to collect ochre, and 7th paint – materials critical for Siksika ceremonial practices.	Teck acknowledges the interest expressed by the Siksika Nation regarding potential impacts to on Siksika's ability to collect ochre, and 7th paint, as identified in Section 7.6 of the DPD. The assessment of the Project will consider potential effects to ecosystems and plant species, with consideration of the identified plant materials. Teck proposes to engage with Siksika Nation, the BC EAO and the IAAC to better understand Siksika's interests and how they will interact with the Project and assessment process being undertaken for the Project. Teck will outline a proposed approach to conducting the Indigenous interests assessment in the draft TISG/AIR.	Section 7.6

Table A-1: Concordance Table for the Summary of Engagement Received through the Provincial *Environmental Assessment Act* Process

Summary of Engagement			Proponent Response[1]	
Comment Category or Commenting Group	**Comment ID**	**Comment Summary**	**Proponent Response**	**Location in the DPD**
Siksika Nation (continued)	SOE-Siksika-06	Concerns regarding the Castle Project's impacts to camping and gathering sites of cultural, spiritual and historic importance, which are important for the transmission of traditional culture, knowledge and law.	Teck acknowledges the interest expressed by the Siksika Nation regarding potential impacts to camping and gathering sites, as identified in Section 7.6 of the DPD. Teck proposes to engage with Siksika Nation, the BC EAO and the IAAC to better understand Siksika's interests and how they will interact with the Project and assessment process being undertaken for the Project. The overall approach to conducting the Indigenous interests assessment is presented in the draft TISG/AIR.	Section 7.6
	SOE-Siksika-07	Concerns regarding potential impacts to uses of a parcel of land near Coleman, Alberta, about 60 km from the Castle Project, which is used as a base to support its members' exercise of Treaty and Aboriginal rights and traditional land uses in the Crowsnest Pass and Kootenay region.	Teck acknowledges the interest expressed by the Siksika Nation regarding potential impacts to uses of a parcel of land near Coleman. Teck anticipates that there will be no direct Project impacts on the identified parcel of land. Teck proposes to engage with Siksika Nation, the BC EAO and the IAAC to better understand Siksika's interests and how they will interact with the Project and assessment process being undertaken for the Project. Teck will outline a proposed approach to conducting the Indigenous interests assessment in the draft TISG/AIR.	Section 7.7
	SOE-Siksika-08	Concerns regarding the Castle Project's impacts to Siksika's hunting rights, including hunting practices of elk, mule deer, bighorn sheep (a species of cultural importance), moose and occasionally bear.	Teck acknowledges the interest expressed by the Siksika Nation regarding potential impacts to Siksika's hunting rights, as identified in Section 7.6 of the DPD. Teck proposes to engage with Siksika Nation, the BC EAO and the IAAC to better understand Siksika's interests and how they will interact with the Project and assessment process being undertaken for the Project. Teck will outline a proposed approach to conducting the Indigenous interests assessment in the draft TISG/AIR.	Section 7.6
	SOE-Siksika-09	Concerns regarding the Castle Project increasing disturbance of land in Siksika Nation's traditional territory, which could result in reduced harvesting areas and removal of plants and wildlife. This area is one of the few remaining areas within Siksika's territory that hasn't been taken up or disturbed – it is thus one of the few remaining areas where Siksika can continue to practice its rights.	Teck acknowledges the interest expressed by the Siksika Nation regarding potential impacts to Siksika's traditional territory and associated reduction in harvesting areas, as identified in Section 7.6 of the DPD. Teck proposes to engage with Siksika Nation, the BC EAO and the IAAC to better understand Siksika's interests and how they will interact with the Project and assessment process being undertaken for the Project. Teck will outline a proposed approach to conducting the Indigenous interests assessment in the draft TISG/AIR.	Section 7.6
	SOE-Siksika-10	Concerns regarding impacts to environmentally sensitive habitats, including westslope cutthroat trout habitat.	Teck acknowledges the interest expressed by the Siksika regarding potential impacts to environmentally sensitive habitats, including westslope cutthroat trout habitat, as identified in Section 7.6 of the DPD. The assessment of the Project will also consider effects to environmentally sensitive areas, including westslope cutthroat habitat, as identified in Appendix I. Teck proposes to also engage with Siksika Nation, the BC EAO and the IAAC to better understand Siksika's interests and how they will interact with the Project and assessment process being undertaken for the Project. Teck will outline a proposed approach to conducting the Indigenous interests assessment in the draft TISG/AIR.	Section 7.6 and Appendix I
	SOE-Siksika-11	Interests in protection of wildlife habitat, migratory birds and fish and fish habitat.	Teck acknowledges the interest expressed by the Siksika regarding protection of wildlife habitat, migratory birds, fish and fish habitat, as identified in Section 7.6 of the DPD. The assessment of the Project will consider effects to wildlife habitat, migratory birds and fish and fish habitat, as identified in Appendix I. Teck proposes to also engage with Siksika Nation, the BC EAO and the IAAC to better understand Siksika's interests and how they will interact with the Project and assessment process being undertaken for the Project. Teck will outline a proposed approach to conducting the Indigenous interests assessment in the draft TISG/AIR.	Section 7.6 and Appendix I

Table A-1: Concordance Table for the Summary of Engagement Received through the Provincial *Environmental Assessment Act* Process

Summary of Engagement			Proponent Response[1]	
Comment Category or Commenting Group	**Comment ID**	**Comment Summary**	**Proponent Response**	**Location in the DPD**
Siksika Nation (continued)	SOE-Siksika-12	Concerns regarding the Castle Project's impacts to bighorn sheep populations, as the project location contains the highest density of sheep within the region. The Castle Project may impact bighorn sheep wintering range and some of the bighorn sheep relying on winter range in the Castle Project area may travel into Alberta thus impacting Alberta populations. Impacts to bighorn sheep may have corresponding impacts on Siksika's treaty right to hunt bighorn sheep. Siksika has an interest in participating in studying impacts to bighorn sheep wintering range.	Teck acknowledges the interest expressed by the Siksika Nation regarding potential impacts to bighorn sheep, as identified in Section 7.6 of the DPD. The assessment of the Project will consider effects to wildlife, including bighorn sheep and their habitat, as identified in Appendix I. Teck proposes to also engage with Siksika Nation, the BC EAO and the IAAC to better understand Siksika's interests and how they will interact with the Project and assessment process being undertaken for the Project. Teck will outline a proposed approach to conducting the Indigenous interests assessment in the draft TISG/AIR.	Section 7.6 and Appendix I
	SOE-Siksika-13	Concerns regarding the Projects impacts on water and air quality. In particular, the Castle Project may contribute to water contamination, particularly as a result of selenium. These impacts may in turn decrease Siksika's confidence in the resources in and around the area that support its practice of its rights.	Teck acknowledges the interest expressed by the Siksika Nation regarding potential Project impacts on water and air quality, as identified in Section 7.6 of the DPD. The assessment of the Project will consider effects to water and air quality, as identified in Appendix I. Teck proposes to also engage with Siksika Nation, the BC EAO and the IAAC to better understand Siksika's interests and how they will interact with the Project and assessment process being undertaken for the Project. Teck will outline a proposed approach to conducting the Indigenous interests assessment in the draft TISG/AIR.	Section 7.6 and Appendix I
	SOE-Siksika-14	Concerns with respect to the Projects contribution to existing and future cumulative effects as the Castle Project is one of six new mine projects being considered in addition to the five already existing mines.	Teck acknowledges the interest expressed by the Siksika Nation regarding potential Project cumulative impacts as identified in Section 7.6 of the DPD. The assessment of the Project will consider cumulative effects as identified in Appendix I. Teck proposes to engage with Siksika Nation, the BC EAO and the IAAC to better understand Siksika's interests and how they will interact with the Project and assessment process being undertaken for the Project. Teck will outline a proposed approach to conducting the Indigenous interests assessment in the draft TISG/AIR.	Section 7.6 and Appendix I
	SOE-Siksika-15	Interests in further understanding of the Castle Project's impacts to facilitate informed decision making, including collecting information on: • Traditional land uses use of the Castle Project Area; • Conditions and resources needed to support practice of rights; • Impacts of the Castle Project on water quality in and around the Castle Project area; • Impacts of the Castle Project on wildlife, particularly, on bighorn sheep; • Assessment of the impacts of the Project on Siksika's rights; and • The ways in which Teck's existing mines have already impacted wildlife populations, water quality and other resources in the surrounding area; through existing monitoring data with respect to the impact Teck's current operations are having on these resources to help inform understanding of the impacts of the Castle Project.	Teck acknowledges the interest expressed by the Siksika regarding further understanding of potential Project impacts through collection of information. Teck proposes to engage with Siksika Nation, the BC EAO and the IAAC to better understand Siksika's interests and how they will interact with the Project and assessment process being undertaken for the Project, including ways to collect relevant information.	Section 7.6

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Summary of Engagement			Proponent Response[1]	
Comment Category or Commenting Group	**Comment ID**	**Comment Summary**	**Proponent Response**	**Location in the DPD**
Piikani Nation	SOE-Piikani-01	Interests in high elevation grasslands, which are home to a range of species of cultural importance, sacred sites and subsistence activities.	Teck acknowledges the interest expressed by Piikani Nation regarding high elevation grasslands, culturally important species, sacred sites and subsistence activities, as identified in Section 7.5 of the DPD. Information about high elevation grasslands, including Teck's regional and Project actions, is also presented in Sections 9.1.3 and 9.3, and the Project's potential interactions with the environment, along with potential mitigations is presented in Appendix I. The assessment of the Project will evaluate the Project's potential effects to grasslands and other species. Teck proposes to engage with the Piikani Nation, the BC EAO and the IAAC to better understand Piikani's interests and how they interact with the Project and assessment process being undertaken for the Project. Teck will outline a proposed approach to conducting the Indigenous interests assessment in the draft TISG/AIR.	Sections 7.5, 9.1.3 and 9.3 and Appendix I
	SOE-Piikani-02	Interests in plants and vegetation harvested for medicinal, ceremonial, and other cultural purposes, including saskatoon, soopolallie (buffaloberry), common juniper, birch, yarrow, lodgepole pine.	Teck acknowledges the interest expressed by Piikani Nation regarding harvest of plants and vegetation for medicinal, ceremonial, and other cultural practices, as identified in Section 7.5 of the DPD. Information about plants and ecosystems in the Project area is presented in Section 9.3.1 and the Project's potential interactions with the environment, along with potential mitigations, is presented in Appendix I. The assessment of the Project will evaluate the Project's potential effects to ecosystems and vegetation. The scope of this assessment will be proposed in the draft TISG/AIR.	Sections 7.5, 9.3.1 and Appendix I
	SOE-Piikani-03	Concerns regarding effects of selenium on fish populations in the Elk River watershed as a result of coal mining in the region.	Teck acknowledges the interest expressed by Piikani Nation regarding water quality and fish, as identified in Section 7.5 of the DPD. Also refer to Section 1.2.2. The Project's potential impacts to water quality and fish, along with potential mitigations, is presented in Section 10.1.2 and Appendix I. The assessment of the Project will evaluate the Project's potential effects to water quality and fish. The scope of this assessment will be proposed in the draft TISG/AIR.	Sections 1.2.2, 7.5, 10.1.2 and Appendix I
	SOE-Piikani-04	Interests in grizzly bear, which have significance within spiritual and ceremonial teachings, songs, ceremonies, medicines, and stories, as evidenced by the Grizzly Bear Treaty (2016), initiated by Piikani Nation and led by Chief Stan Grier, which intends to protect and restore Grizzly Bear habitat across North America.	Teck acknowledges the interest expressed by Piikani Nation regarding grizzly bear, as identified in Section 7.5 of the DPD. The Project's potential impacts to terrestrial resources including wildlife, along with potential mitigations, is presented in Section 10.1.1 and Appendix I. The assessment of the Project will evaluate the Project's potential effects to grizzly bear as a VC for the Project. The scope of this assessment will be proposed in the draft TISG/AIR.	Section 7.5 and 10.1.1 and Appendix I
	SOE-Piikani-05	Interests in the potential for archaeological resources in the project area.	Teck acknowledges the interest expressed by Piikani Nation regarding potential impacts to archaeological resources in the Project area, as identified in Section 7.5 of the DPD. The assessment to be conducted for the Project would include evaluation of potential impacts to archaeological resources. The proposed scope of this assessment will be presented in the draft TISG/AIR.	Section 7.5 and Appendix I
	SOE-Piikani-06	Interests in undertaking a traditional use study to reaffirm Piikani ties to ancestral lands and identify mitigations which may reduce the Castle Project's impacts on Piikani Nation's rights and interests.	Teck acknowledges the Piikani Nation interest in a traditional use study. Teck proposes to engage with the Piikani Nation, the BC EAO and the IAAC to better understand Piikani's interests and how they interact with the Project and assessment process being undertaken for the Project, including what studies might be appropriate.	Section 7.5
	SOE-Piikani-07	Concerns regarding the Castle Project’s potential to further erode access to Piikani ancestral territories for spiritual, cultural and subsistence uses.	Teck acknowledges the feedback related to access to locations for traditional land use. Teck proposes to hold engagements specific to the Project to understand how to mitigate potential impacts to access and/or identify possible alternatives. Teck will engage with the Piikani Nation, the BC EAO and the IAAC to better understand Piikani's interests and how they interact with the Project and assessment process being undertaken for the Project. Teck will outline a proposed approach to conducting the Indigenous interests assessment in the draft TISG/AIR.	Section 7.5

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Summary of Engagement			Proponent Response[1]	
Comment Category or Commenting Group	**Comment ID**	**Comment Summary**	**Proponent Response**	**Location in the DPD**
Shuswap Indian Band	SOE-Shuswap-01	Concerns regarding further resource development limiting transmission of Indigenous knowledge and practices across generations.	Teck acknowledges the interest expressed by Shuswap Indian Band regarding potential impacts to transmission of Indigenous knowledge and practices. This concern has been identified in Section 7.3 of the DPD. Teck proposes to engage with Shuswap Indian Band, the BC EAO and the IAAC to better understand Shuswap's interests and how they will interact with the Project and assessment process being undertaken for the Project. Teck will outline a proposed approach to conducting the Indigenous interests assessment in the draft TISG/AIR.	Section 7.3
	SOE-Shuswap-02	Concerns regarding potential impacts to archaeological sites and artifact gathering by band members. Interests in participating in any archaeological monitoring work conducted in the project area.	Teck acknowledges the interest expressed by Shuswap Indian Band regarding potential impacts to archaeological sites and transmission of Indigenous knowledge and practices. This concern has been identified in Section 7.3 of the DPD. The assessment to be conducted for the Project would include evaluation of potential impacts to archeological resources. Teck will propose the scope of this assessment in the draft TISG/AIR. Teck proposes to continue to engage with the Shuswap Indian Band about potential participation in relevant future archaeological field work conducted in the Project area.	Section 7.3
	SOE-Shuswap-03	Interests in continued access to areas of key cultural and spiritual significance including trails, travel corridors, waterways, mountains, and burial sites.	Teck acknowledges the feedback provided by Shuswap Indian Band related to access to locations for traditional land use and access, and this concern has been identified in Section 7.3 of the DPD. Teck proposes to evaluate potential impacts to land use including traditional land use in the Indigenous interests assessment. Teck will outline a proposed approach to conducting the Indigenous interests assessment in the draft TISG/AIR.	Section 7.3
	SOE-Shuswap-04	Concerns regarding potential impacts to subsistence harvesting in and surrounding the project area, including fishing, plant gathering, hunting and mineral gathering from changes to surface and ground water quality, increased traffic and habitat destruction.	Teck acknowledges the interest expressed by Shuswap Indian Band regarding potential impacts to subsistence harvesting in the Project area, and this concern has been identified in Section 7.3 of the DPD. Teck proposes to evaluate potential impacts to land use including traditional land use in the Indigenous interests assessment. Teck will outline a proposed approach to conducting the Indigenous interests assessment in the draft TISG/AIR.	Section 7.3
	SOE-Shuswap-05	Concerns regarding fish and fish habitat and water quality in the Elk River and the White River and an interest in participating in water quality and fish monitoring work conducted in the project area.	Teck acknowledges the interest expressed by Shuswap Indian Band regarding fish and fish habitat and water quality in the Elk River and the White River. Teck notes that due to the location of the White River, there are no anticipated direct Project impacts to that river system. The identified concern has been identified in Section 7.3 of the DPD. Information about the Project's potential effects on fish and fish habitat and water quality, along with potential mitigations, is also provided in Appendix I. The assessment of the Project would evaluate potential effects on fish and fish habitat and water quality. The proposed scope of this assessment will be presented in the draft TISG/AIR.	Section 7.3 and Appendix I
	SOE-Shuswap-06	Concerns regarding indirect impacts, including cumulative effects to soil, wildlife, plants, and water.	Teck acknowledges the interest expressed by Shuswap Indian Band regarding cumulative effects. The identified concern has been identified in Section 7.3 of the DPD. Appendix I also identifies the potential Project impacts and mitigations. The assessment of the Project would evaluate potential cumulative effects, consistent with provincial and federal guidance. The proposed scope of the cumulative effects assessment will be presented in the draft TISG/AIR.	Section 7.3 and Appendix I
	SOE-Shuswap-07	Interests in plant species of importance including Labrador tea, *sx̓úsem* (soapberries), glacier lilies (wild sweet potato), Devil's club, willow, and Canby lovage; and animal species of importance harvested by band members in the project area, including elk, deer, and fur bearing species.	Teck acknowledges that species of interest to the Shuswap Indian Band may be in the Project area. The identified concern has been identified in Section 7.3 of the DPD. Information about the Project's potential effects on terrestrial resources, along with potential mitigations, is also provided in Appendix I. The assessment of the Project would evaluate potential effects on ecosystems, plants and animals. The proposed scope of this assessment will be presented in the draft TISG/AIR.	Section 7.3 and Appendix I

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Summary of Engagement			Proponent Response[1]	
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Shuswap Indian Band (continued)	SOE-Shuswap-08	Interests in socio-economic factors such as employment and economic opportunities.	Teck acknowledges the identified concern and has identified it in Section 7.3 of the DPD. Information about potential benefits of the FRX Project to the local communities, including Indigenous communities, regional, and national economies is provided in Sections 2.2, 5.1.4, and Appendix I. Teck will engage with the Shuswap Indian Band, the BC EAO and IAAC to assess Indigenous interests that may be affected by the Project, including employment and economic opportunities for Shuswap Indian Band members. Teck will outline a proposed approach to conducting the Indigenous interests assessment in the draft TISG/AIR.	Sections 2.2, 5.1.4 and 7.3 and Appendix I
	SOE-Shuswap-09	Concerns regarding impacts to human and ecosystem health due to potential changes in air quality and noise.	Teck acknowledges the identified concern and has identified it in Section 7.3 of the DPD. Information about Project air emissions is provided in Section 5.4.2; the Projects potential impacts to air quality and noise, along with potential mitigations, is also addressed in Appendix I. The assessment of the Project would evaluate potential impacts of air quality and noise on human and ecosystem health. The proposed scope of this assessment will be presented in the draft TISG/AIR.	Sections 5.4.2 and 7.3 and Appendix I
	SOE-Shuswap-10	Interests in undertaking a traditional land use study.	Teck acknowledges the Shuswap Indian Band interest in a collecting data and undertaking a traditional land use study (refer to Section 7.3 of the DPD). Teck proposes to engage with the Shuswap Indian Band, the BC EAO and IAAC to assess Indigenous interests that may be affected by the Project and assessment process being undertaken for the Project.	Section 7.3
Stoney Nakoda Nation	SOE-StoneyNakoda-01	Interests in environmental stewardship, natural resource management and monitoring of their traditional lands.	Teck acknowledges the interest expressed by Stoney Nakoda Nation regarding environmental stewardship, natural resource management and monitoring of their traditional lands, as identified in Section 7.4 of the DPD. Teck proposes to engage with Stoney Nakoda Nation, the BC EAO and the IAAC to better understand this interest and how it interacts with the Project and assessment process being undertaken for the Project. Teck will outline a proposed approach to conducting the Indigenous interests assessment in the draft TISG/AIR.	Section 7.4
	SOE-StoneyNakoda-02	Interests in documentation and preservation of traditional place names and oral narrative within southeastern BC.	Teck acknowledges the interest expressed by Stoney Nakoda Nation to document and preserve traditional place names and oral narrative within southeastern BC, as identified in Section 7.4 of the DPD. Teck proposes to engage with Stoney Nakoda Nation, the BC EAO and the IAAC to better understand this interest and how it interacts with the Project and assessment process being undertaken for the Project.	Section 7.4
	SOE-StoneyNakoda-03	Interests in participating in any Environmental Monitoring Committee established for the Elk Valley Water Quality Plan.	Teck acknowledges the interest expressed by Stoney Nakoda Nation to participate in the Environmental Monitoring Committee, as identified in Section 7.4. of the DPD. As discussed in Section 9.1.2, membership on that committee is proscribed by the permit and would require an amendment by the Ministry of Environment to change the membership.	Sections 7.4 and 9.1.2
	SOE-StoneyNakoda-04	Interests in ensuring traditional knowledge, cultural perspectives, and experiential components of the land are considered in the assessment of the Project.	Teck acknowledges the interest expressed by Stoney Nakoda Nation's interests, as identified in Section 7.4 of the DPD. Teck proposes to engage with Stoney Nakoda Nation, the BC EAO and the IAAC to better understand these interests and how they interact with the Project and assessment process being undertaken for the Project. Teck will outline a proposed approach to conducting the Indigenous interests assessment in the draft TISG/AIR.	Section 7.4
	SOE-StoneyNakoda-05	Interests in the continued access to locations where hunting, fishing, harvesting, ceremonial and cultural practices occur and the persistence of these activities, traditions, and customs.	Teck acknowledges the feedback related to access to locations for traditional land use, as identified in Section 7.4 of the DPD. Teck proposes to engage with Stoney Nakoda Nation, the BC EAO and the IAAC to better understand these interests and how they will interact with the Project and assessment process being undertaken for the Project. Teck will outline a proposed approach to conducting the Indigenous interests assessment in the draft TISG/AIR.	Section 7.4
	SOE-StoneyNakoda-06	Interests in conducting a traditional use/traditional knowledge study for the project area to identify Stoney Nakoda specific values, knowledge and interests related to the project area and required mitigations and measures to reduce impacts to Stoney Nakoda rights, uses and interests.	Teck acknowledges the Stoney Nakoda Nation interest in a traditional use/traditional knowledge study. Teck proposes to engage with Stoney Nakoda Nation, the BC EAO and the IAAC to better understand these interests and how they will interact with the Project and assessment process being undertaken for the Project.	Section 7.4

Table A-1: Concordance Table for the Summary of Engagement Received through the Provincial *Environmental Assessment Act* Process

Summary of Engagement			Proponent Response[1]	
Comment Category or Commenting Group	**Comment ID**	**Comment Summary**	**Proponent Response**	**Location in the DPD**
Water quality (e.g., selenium) impacts on the biophysical environment and on human health	SOE-Summary-01	Expand on content in the Initial Project Description around potential water quality impacts based on feedback received during Early Engagement and indicate how these potential impacts may be assessed to inform the Application Information Requirements, including reference to ongoing work to mitigate water quality impacts.	Additional information about water quality and Teck's initiatives to manage water quality, including ground and surface water quantity and quality, is provided in Sections 1.2.2, 8, and 9.1.2 of the DPD. Description of the Project's proposed approach for water quality source control and treatment is included in Section 4.4, with water management planning for the Project further described in Section 5.3.4. The Project's potential impacts to water quality, along with potential mitigations, are identified in Section 10.1.2 and Appendix I. Development of Project-specific infrastructure will consider learnings from regional initiatives such as those outlined in Section 9.1.2. The assessment of the Project will evaluate potential impacts of water quality. Teck will propose the scope of the water quality assessment, including assessment of other VCs that may be affected by changes in water quality, in the draft TISG/AIR.	Sections 1.2.2, 4.4, 5.3.4, 8, 9.1.2 and 10.1.2 and Appendix I.
Impacts on species at risk, including westslope cutthroat trout, Rocky Mountain bighorn sheep, high elevation grasslands, and white bark pine	SOE-Summary-02	Include specific reference to potential impacts on westslope cutthroat trout, Rocky Mountain bighorn sheep, high elevation grasslands, and white bark pine to clearly indicate how the project design considered these impacts and mitigates them. Provide additional information regarding baseline studies to inform the Application Information Requirements to assess these impacts.	The DPD outlines Teck's participation in regional initiatives, plans and programs dedicated to evaluating and managing impacts to the identified VCs (Section 9.1.3) and includes specific reference to potential Project effects to westslope cutthroat trout, bighorn sheep, grasslands and whitebark pine in Sections 1.2.2 and 8. Appendix E also includes a list of ongoing studies to support our understanding of these important VCs and their habitats. Relevant information from these studies will be compiled in existing information reports to be included in the assessment application. Teck will propose the scope of the assessment, including assessment of ecosystems, communities and species of conservation concern such as those listed, in the draft TISG/AIR.	Sections 1.2.2 8, and 9.1.3 and Appendix E
Cumulative effects on water quality, air quality, soil, terrestrial wildlife and ecosystems and the transmission of Indigenous Knowledge and cultural practices	SOE-Summary-03	Include reference to potential cumulative effects on water quality and terrestrial wildlife and ecosystems and additional information to inform the Application Information Requirements to assess these impacts.	Reference to Project potential cumulative effects on water quality and terrestrial wildlife and ecosystems is provided in Sections 1.2.2 and 8 and Appendix I. The assessment of the Project will evaluate potential cumulative impacts to water quality and terrestrial wildlife and ecosystems. Teck will propose the scope of the scope of the cumulative effects assessment, including the plan for assessing potential water quality impacts and other VCs, in the draft TISG/AIR.	Sections 1.2.2 and 8 and Appendix I
Importance of mining to the economy	SOE-Summary-04	Expand on content in the Initial Project Description around the potential benefits of the Castle Project to the local, regional, and national economies.	A description of potential benefits of the FRX Project to the local, regional, and national economies is provided in Sections 2.2 and 5.1.4. Potential interactions between the Project and the local, regional and national economies are also indicated in Appendix I. Teck will propose the scope of the socio-economic effects assessment, including potential benefits, in the draft TISG/AIR.	Sections 2.2 and 5.1.4 and Appendix I
Impacts to traditional and current land use practices for ceremonial, cultural, medicinal, harvesting and subsistence purposes, involving plants and vegetation; wildlife and wildlife habitat; fish and fish habitat; and specific sites of archaeological and ceremonial importance.	SOE-Summary-05	Ensure understanding of the location of where these practices occur in relation of the Castle Project area, through engagement with participating Indigenous nations.	Teck is committed to engagement with participating Indigenous Peoples, in collaboration with the BC EAO and the IAAC, to develop understanding of the location of traditional practices in relation to the Project. While this engagement will continue throughout the assessment process, it will be of value if traditional and community knowledge is made available for development of the TISG/AIR during process planning.	Sections 7 and 10.1.3
	SOE-Summary-06	Provide information on how these practices, and the locations and sites they occur, would be assessed to inform the Application Information Requirements. Include how the Castle Project's potential impacts on these practices will be assessed, based on discussions with participating Indigenous nations.		
	SOE-Summary-07	Describe how traditional knowledge, cultural perspectives, and experiential components will be incorporated into the Application Information Requirements.		

AIR = Application Information Requirements; BC = British Columbia; BC EAA = British Columbia Environmental Assessment Act; BC EAO = British Columbia Environmental Assessment Office; DPD = Detailed Project Description; EVWQP = Elk Valley Water Quality Plan; FRO = Fording River Operations; FRX = Fording River Extension; GBA+ = Gender-based Analysis Plus; GHGs = Greenhouse gases; IAA = Impact Assessment Act; IAAC = Impact Assessment Agency of Canada; KNC = Ktunaxa Nation Council; PUB = Public; SOE = Summary of Engagement; TAC = Technical Advisory Committee; TISG = Tailored Impact Statement Guidelines; VCs = Valued Components; WCT = Westslope cutthroat trout

Appendix B: Concordance Table for the Summary of Issues Identified through the Federal *Impact Assessment Act*

Table B-1: Concordance Table for the Summary of Issues Identified through the Federal *Impact Assessment Act*

Element	Comment ID	Issue	Proponent Response[1]	Location in the DPD (Updated to concord with the Revised DPD)
Air Quality	SOI-01	• Effects to air quality and impacts of those effects on human health and recreation sites.	Concerns related to effects to air quality as a result of the Project, and the potential resulting changes to human health and/or recreation sites are identified in the DPD (Sections 1.2, 7, and 8). The potential interaction between the Project and these aspects of the physical and human environment are also identified in Appendix I. The scope of the air quality and the assessment of other valued components (VCs) that may be affected by changes to air quality will be proposed in the draft Tailored Impact Statement Guidelines/Application Information Requirements (TISG/AIR).	• Section 1.2 • Section 7 • Section 8 • Appendix I
	SOI-02	• Effects to the biophysical environment, and ecosystem health and function resulting in impacts to air quality from dust and greenhouse gas (GHG) emissions.	Concerns related to changes in dust, air quality and greenhouse gas emissions and the potential for such changes to affect the biophysical environment and ecosystem condition are identified in the DPD (e.g., Section 1.2, 7 and 8). The potential interaction between the Project and air quality and greenhouse gases are also identified in Appendix I. The scope of the air quality and the assessment of other VCs that may be affected by changes to air quality will be proposed in the draft TISG/AIR.	• Section 1.2 • Section 7 • Section 8 • Appendix I
Aquatic Resources	SOI-03	• Effects to aquatic species, specifically reductions in the abundance of certain species (for example, mayflies) and increased tissue selenium and nitrate concentrations.	Concerns related to the potential for the Project to interact with aquatic resources due to changes in water quality or other stressors are identified in the DPD (Sections 1.2, 7 and 8). The potential interaction between the Project and these aspects of the physical and biological environment are also identified in Section 10 (Table 10.1-2) and Appendix I. The scope of the water quality assessment and the assessment of other VCs that may be affected by changes to water quality, including the potential for changes in abundance of fish and benthic invertebrates, will be proposed in the draft TISG/AIR.	• Section 1.2 • Section 7 • Section 8 • Section 10 (Table 10.1-2) • Appendix I
Climate Change and GHG Emissions	SOI-04	• Impacts of upstream and downstream GHG emissions, particularly carbon dioxide and methane emissions.	Refer to SOI-02. Teck is committed to carbon neutrality across its operations by 2050, which aligns with provincial and federal GHG reduction targets. The assessment of the Project will evaluate the Project's potential greenhouse gas emissions consistent with the Strategic Assessment of Climate Change. Teck will propose the scope of this assessment in the draft TISG/AIR. Refer to Section 5.4.2 of the DPD. The Strategic Assessment of Climate Change provides guidance on the scope of the assessment including the extent of effects to be considered, assessing the Project's effects on GHG emissions, carbon sinks, and contribution to Canada's emission reduction efforts and global GHG emissions.	• Section 5.4.2
	SOI-05	• Implications of upstream GHG emissions to Canada's ability to meet national GHG reduction commitments and climate goals.		
	SOI-06	• Climate impacts of downstream GHG emissions from use of mined coal. • Effects of deforestation, including the loss of carbon sinks.		
	SOI-07	• The resilience of the Project to climate change.	Effects of the environment on the Project are discussed in the DPD in Section 10.3. Teck will propose in the draft TISG/AIR that risks associated with climate change and natural hazards and mitigations incorporated to manage these risks be assessed.	• Section 10.3
	SOI-08	• The need for the proponent to ensure that information described in the Strategic Assessment of Climate Change is provided.	The Strategic Assessment of Climate Change will be used to inform the assessment of potential Project GHG emissions.	• Section 5.4.2
	SOI-09	• Consideration of offsetting direct GHG emissions of the Project.	Offsetting of direct GHG emissions will be considered as part of Teck's strategy to support 2050 carbon neutrality goals. In the draft TISG/AIR, Teck will propose implementation of a mitigation hierarchy to avoid, minimize, rehabilitate or offset effects, where required, be identified in the IS/A.	-

[1] Reference to section numbers have been updated to concord with the Revised DPD, however, the content of the responses (including reference to Teck [Teck Coal Limited], who changed its name to EVR Operations Limited in July 2024) has not been modified to remain consistent with its original intent of responding to the Summary of Issues identified by IAAC on November 13, 2020.

Table B-1: Concordance Table for the Summary of Issues Identified through the Federal *Impact Assessment Act*

Element	Comment ID	Issue	Proponent Response[1]	Location in the DPD (Updated to concord with the Revised DPD)
Cumulative Effects	SOI-10	• Coal mining has been occurring in the Elk Valley for over 100 years which has resulted in changes to the biophysical and human environment, including cumulative effects to land, water, resources and Indigenous peoples.	Concerns related to cumulative effects are identified in the DPD (Sections 1.2, 7 and 8). Section 9.1.1 acknowledges that coal has been mined in the Elk Valley since the late 1890s and that mining activity, combined with other activities including forestry, urban and rural development, transportation infrastructure, agriculture and more, has resulted in changes to the biophysical and human environment in the area. As outlined in Section 9.1.2 of the DPD, Teck has been involved in efforts to understand and reduce the effects of mining in the Project region and collaborates in various initiatives that include government regulators and agencies, the Ktunaxa Nation Council, and other communities of interest. The scope of cumulative effects assessment (the residual incremental and cumulative effects associated with the Project and other past, present and reasonably foreseeable developments) will be proposed in the daft TISG/AIR. As part of the development of the draft TISG/AIR, Teck will propose that this context be identified in the Impact Statement/ Application (IS/A) and considered in the assessment of the Project in terms of its relevance to the assessment of the VCs and factors to be assessed.	• Section 1.2 • Section 7 • Section 8 • Section 9.1.1 • Section 9.1.2
	SOI-11	• Importance of cumulative effects assessments.		
	SOI-12	• Long-term and cumulative effects to wildlife and species at risk, including effects to migration corridors and species at risk such as Grizzly Bear and Whitebark Pine.	Concerns related to effects to wildlife that may result from the Project, including the Project's potential to contribute to cumulative effects to wildlife, species at risk, and fish and fish habitat, are identified in the DPD (Sections 1.2, 7, and 8). The potential interaction between the Project and these aspects of the biological environment are also identified in Section 10 (Tables 10.1-1 and 10.1-2) and Appendix I. The scope of the wildlife and fish and fish habitat assessments, including the temporal boundaries for the assessment, will be proposed in the draft TISG/AIR. Teck will propose in the draft TISG/AIR that the assessment consider the duration of potential effects that may be contributed by the Project.	• Section 1.2 • Section 7 • Section 8 • Section 10 (Tables 10.1-1 and 10.1-2) • Appendix I
	SOI-13	• Long-term and cumulative effects to fish and fish habitat, including Westslope Cutthroat Trout, Bull Trout, Mountain Whitefish and smaller species in B.C. and the United States.		
	SOI-14	• Cumulative effects of the Project on Indigenous peoples' physical and cultural heritage, current use of lands and resources for traditional purposes, sites or things of historical archeological or cultural important, as well as health, social or economic conditions, and on the exercise of Aboriginal and Treaty rights.	Teck is committed to engaging with potentially affected Indigenous Peoples to understand the Project's potential effects to their rights and interests, including the Project's potential contribution to cumulative effects. Concerns related to effects to Indigenous People's physical and cultural heritage, current uses of land and resources for traditional purpose, sites or things of historical, archaeological or cultural importance, health, social and economic conditions as well as the exercise of Aboriginal and Treaty rights are identified in the DPD (e.g., Section 1.2, 7 and 8). The potential interaction between the Project and Indigenous Peoples is also identified in Section 10 (Tables 10.1-3 and 10.1-4) and Appendix I.	• Section 1.2 • Section 7 • Section 8 • Section 10 (Table 10.1-3 and 10.1-4) • Appendix I

Differential Impacts upon Diverse Persons and Groups	SOI-15	• Differential impacts based on sex and gender, which may include groups identified by age, place of residence, ethnicity, socio-economic status, employment status or disability for example, in a variety of ways including:
		  • employment opportunities,
		  • access to revenues;
		  • access to safe and affordable housing;
		  • compensation or benefits and expanded investment in the local community;
		  • decision making roles for new innovation and technologies; and
		  • access to services and programs that account for the perspective, knowledge and experiences of individuals and communities.
			Concerns related to potential Project effects to diverse persons or groups are identified in the DPD (Section 1.2). The potential interaction between the Project and diverse groups of people are also identified in Appendix I. The scope of the social, economic and health assessments will be proposed in the draft TISG/AIR, with consideration of this comment.	• Section 1.2
				• Appendix I

	SOI-16	• The Project may create and exacerbate existing inequalities.		

Table B-1: Concordance Table for the Summary of Issues Identified through the Federal *Impact Assessment Act*

Element	Comment ID	Issue	Proponent Response[1]	Location in the DPD (Updated to concord with the Revised DPD)
Economic Conditions	SOI-17	• Delays caused by impact assessments to the Project's timeline, thus impacting employment income and economic stability that residents and their families rely upon.	Concerns related to economy, employment, income, population, demand on local services and infrastructure, and tourism as a result of the Project are identified in the DPD (e.g., Sections 1.2, 7, and 8). The potential interaction between the Project and these aspects of the human environment are also identified in Appendix I. The scope of the social, economic and health assessments will be proposed in the draft TISG/AIR, with consideration of this comment. As part of the draft TISG/AIR, Teck will propose that assessment of employment and economy be conducted within defined construction, operational and closure temporal boundaries for the Project. Potential for delays to Project development are not proposed to be considered as a primary dimension of the Project but may be considered in context.	• Section 1.2 • Section 7 • Section 8 • Appendix I
	SOI-18	• Lack of long-term economic and environmental sustainability of the coal industry due to decreased of market demand for coal, and the need for development of green alternatives and green jobs.	Teck has outlined the need and purpose of the Project in Section 2 of the DPD. Teck will propose in the draft TISG/AIR that characterization of existing regional economy include discussion of historical and future projected trends pertaining to the coal industry as well as local and regional economic and community development plans, priorities and activities. If issues and priorities pertaining to green alternatives and jobs related to the Project are identified through engagement and socio-economic data collection, these will be documented for further consideration.	• Section 2
	SOI-19	• Loss of cultural and tourism values, including reduced access, changes to plant, fish and wildlife resources, disturbance of visual quality and increase of noise.	Potential for effects to cultural, recreational, and tourism values, including those related to changes to wildlife, visual quality (e.g., enjoyment of scenic values) and sensory conditions, resulting from the Project are identified in Appendix I of the DPD. As part of the draft TISG/AIR, Teck will propose that the land and resource use assessment evaluate changes in area use and access, resource availability for harvesting activities (e.g., fish, wildlife) and sensory disturbances (e.g., noise and visual quality) for guided sport, tourism, and recreational activity. Teck will also propose that the economy assessment consider effects to commercial tourism as a result of Project-related changes to land based area use and access, resource availability, and environmental setting. Teck will propose an aesthetics assessment as part of the draft TISG/AIR to evaluate the potential for effects to visual quality.	• Appendix I
	SOI-20	• Changes to local population, employment, income and training opportunities, and worker safety.	Potential changes to the local population and demographics, local employment and labour income, along with reference to work safety and training, are identified in Appendix I of the DPD. As part of the draft TISG/AIR, Teck will propose that population and demographics, employment, and income be evaluated as part of the assessment of the Project. Teck will also propose that the scope of the community health and wellbeing assessment discuss potential for effects to Project workforce conditions including worker safety.	• Appendix I
	SOI-21	• Influx of a work force for the Project could reduce access to housing, health care, infrastructure, and community services that address people's specific needs, restrict their options and potentially compromise their health.	Potential Project-related changes to the local population and demographics, housing, local services and infrastructure and community health and well-being are identified in Appendix I of the DPD. As part of the draft TISG/AIR, Teck will propose these potential changes be assessed for the Project. The assessment would consider population-driven pressure on housing, services and infrastructure, along with changes in access to healthcare and social services and associated impacts on the health and wellbeing of community members. In the draft TISG/AIR, Teck will propose that the social, economic and health assessments include discussion of differential impacts (e.g., consideration of reliance on specific services).	• Appendix I
	SOI-22	• Possibility of proponent-funded infrastructure and community resources that improve the local quality of life and compensate for Project effects.	As part of the draft TISG/AIR, Teck will propose that the assessment of services and infrastructure, employment and economy and community health and wellbeing be assessed, and that the assessment include a description of Teck's existing and planned infrastructure and other economic and social investment priorities and initiatives as applicable. Where economic, service and infrastructure and/or health impacts and/or benefit opportunities are identified through the respective assessments, mitigation and benefit enhancement measures, including those requiring proponent-funded investments will be identified. Example mitigations and benefit enhancements are indicated in Appendix I of the DPD.	• Appendix I

Table B-1: Concordance Table for the Summary of Issues Identified through the Federal *Impact Assessment Act*

Element	Comment ID	Issue	Proponent Response[1]	Location in the DPD (Updated to concord with the Revised DPD)
Economic Conditions (continued)	SOI-23	• Financial benefits of the Project for employees and for the province of British Columbia. • Concerns about the economic justification of the Project, including a comparison to the previously asserted life of mine for the Swift operation.	Benefits of the Project are identified in Section 5.1.4 of the DPD. As part of the draft TISG/AIR, Teck will propose that the assessment of employment and economy include consideration of Project direct and indirect and induced economic effects along multiple economic indicators including wage income for construction and operational workers, and employment, economic output, GDP and tax revenues at the provincial-level. Refer to Appendix I of the DPD. Need and purpose for the Project is discussed in Section 2.	• Section 2 • Section 5.1.4 • Appendix I
	SOI-24	• Concerns about the adequacy of financial security of the Project including costs associated with certain mitigation measures such as water treatment.	If the Project is approved, Teck will be required to provide financial security, set at a level that reflects outstanding reclamation and closure obligations associated with the site. This process is set through the *Mines Act* approval, which Teck would apply for following a decision approving the Project under the *Environmental Assessment Act* of British Columbia and the *Impact Assessment Act* of Canada.	-
Ecosystems, Vegetation, and Soils	SOI-25	• Loss of biodiversity, and effects to wilderness areas and environmentally sensitive lands, including wetland, riparian, and floodplains ecosystems; grassland and brushland ecosystems; old growth and mature forests; avalanche path ecosystems; Karst ecosystems; and listed/endangered ecological communities.	Concerns related to ecologically sensitive areas and ecosystems, communities and species at risk (including all those listed in the comment) that may be affected by the Project are identified in the DPD (e.g., Sections 1.2, 7 and 8). The potential interactions between the Project and these aspects of the physical and biological environment are also identified in Section 10 (Table 10.1-1) and Appendix I. The scope of the assessment, including that for ecosystems, vegetation, wildlife and fish, will be proposed in the draft TISG/AIR.	• Section 1.2 • Section 7 • Section 8 • Section 10 (Table 10.1-1) • Appendix I
	SOI-26	• Loss of critical grasslands and associated effects to Bighorn Sheep that winter in the grasslands.		
	SOI-27	• Loss of high-elevation mountain slopes and associated effects to Whitebark Pine.		
	SOI-28	• Loss of mature and old growth forests and associated effects to Grizzly Bear and other species.		
	SOI-29	• Loss of soils and inadequate restoration, including impacts to soil quantity, quality, distribution, and its contribution as a critical determinant of ecosystems.	Concerns related to effects to soils as result of the Project, as well as progress regarding reclamation and restoration, were identified in the DPD (Sections 1.2 and 7). The potential interaction between the Project and this aspect of the physical environment is also identified in Appendix I. Teck will propose the scope of the soils assessment in the draft TISG/AIR, including consideration of soil quantity, quality and distribution and contribution to ecosystem function.	• Section 1.2 • Section 7 • Appendix I
Federal Lands	SOI-30	• Effects to connectivity corridors and long-term implications for wildlife populations within the Rocky Mountain National Parks, including to the Kootenay National Park, a national park and connectivity corridor from Waterton-Glacier International Peace Park in Alberta and Montana and the Rocky Mountain parks complex for wide-ranging wildlife, including Grizzly Bears and Wolverines.	Concerns related to effects to federal lands and connectivity of wildlife habitat that may result from the Project are identified in the DPD (Sections 1.2 and 7). The potential interaction between the Project and wildlife habitat are also identified in Section 10 (Table 10.1-1). The scope of the assessment, including consideration of potential effects to habitat distribution and connectivity for wildlife and the geographic scale of the potential effects, will be proposed in the draft TISG/AIR.	• Section 1.2 • Section 7 • Section 10 (Table 10.1-1) • Appendix I

Table B-1: Concordance Table for the Summary of Issues Identified through the Federal *Impact Assessment Act*

Element	Comment ID	Issue	Proponent Response[1]	Location in the DPD (Updated to concord with the Revised DPD)
Fish and Fish Habitat	SOI-31	• Impacts to fish and fish habitat due to increased selenium, nitrate, sulphate, nickel, and cadmium concentrations and calcite deposits from effluent discharge points and seepage from tailings storage and waste rock impoundments.	Concerns related to effects to fish and fish habitat, including effects that may result from changes to water quality, both in the Project vicinity and transboundary environments are identified in the DPD (Sections 1.2, 7, and 8). The potential interaction between the Project and these aspects of the biological environment are identified in Section 10 (Table 10.1-2) and Appendix I. The scope of the water quality, aquatic health and fish and fish habitat assessments, will be proposed in the draft TISG/AIR.	• Section 1.2 • Section 7 • Section 8 • Section 10 (Table 10.1-2) • Appendix I
	SOI-32	• Contaminant levels in fish that migrate from the Project area to Montana.		
	SOI-33	• Consideration of U.S. Environmental Protection Agency, State of Montana, and State of Idaho water quality and fish tissue thresholds.	The scope of the assessment of aquatic resources, including the guidelines and other screening values to be used to assess effects to VCs, will be proposed in the draft TISG/AIR.	-
	SOI-34	• Threats to downstream endangered fish populations, including Westslope Cutthroat Trout, adding to recent declines in the Fording River near the Project site, and White Sturgeon.	Concerns related to effects to fish and fish habitat that may result from the Project are identified in the DPD (Sections 1.2, 7, and 8). The potential interaction between the Project and these aspects of the biological environment is also identified in Section 10 (Table 10.1-2) and Appendix I. As part of the draft TISG/AIR Teck will propose the scope of the water quantity and quality, aquatic health and fish and fish habitat assessments, including consideration of the implications of current population status for species that may be affected by the Project. Teck proposes that the process for selecting VCs for the assessment consider this comment.	• Section 1.2 • Section 7 • Section 8 • Section 10 (Table 10.1-2) • Appendix I
	SOI-35	• Degradation or loss of fish habitat, and resulting impacts on fish populations. Fish habitat includes Chauncey Creek and its tributary streams due to clearing of vegetation during construction, erosion and sedimentation, and Kilmarnock Creek due to waste rock dumps.	Concerns related to effects to fish and fish habitat are identified in the DPD (see response to SOI-34), with specific reference to Chauncey Creek in Section 7.1. As part of the draft TISG/AIR, Teck will propose that the assessment of the Project include consideration of potential impacts to tributaries that contribute to fish habitat, including Chauncey and Kilmarnock creeks. The scope of the assessment of aquatic resources, to be captured through various aquatic VCs/VC subcomponents, will be proposed in the draft TISG/AIR.	• Section 7.1
	SOI-36	• Past and ongoing investigations by Environment and Climate Change Canada (ECCC) on effects to water quality and fish, including fish kills in Line Creek.	Beyond contributing to the understanding of potential effects of mining on the environment, the past and ongoing investigations by ECCC are outside the scope of the Project. As noted above (refer to SOI-34), as part of the draft TISG/AIR Teck will propose the scope of the water quality, aquatic health and fish and fish habitat assessments, including consideration of the implications of current population status for species that may be affected by the Project.	-
Human Health and Well-Being	SOI-37	• Effects to air quality and health impacts to local residents, employees, tourists, and recreational users.	Concerns related to effects to air quality, noise, drinking water, traditional foods, employment, as a result of the Project, and the potential for subsequent effects to human health and community wellbeing are identified in the DPD (Sections 1.2, 7, and 8). The potential interaction between the Project and these aspects of the physical and human environment is also identified in Appendix I. The scope of the health assessment will be proposed in the draft TISG/AIR.	• Section 1.2 • Section 7 • Section 8 • Appendix I
	SOI-38	• Impacts to drinking water due to increased selenium and nitrates, dust emissions, noise, and from impacts to traditional foods due to changes in water and air quality.		
	SOI-39	• Concerns around maintaining local employment, training opportunities, and local suppliers to ensure community wellbeing.	Refer to SOI-20.	-
	SOI-40	• Effects to the health of Indigenous peoples through impacts to the exercise of Indigenous rights and use, now and in the future, of the lands and resources for traditional purposes, such as, hunting, fishing, plant and animal harvesting and cultural practices, in the Project area.	Concerns related to effects to Indigenous use of land for traditional purposes and the exercise of Aboriginal and Treaty rights and the potential for subsequent effects to health and community wellbeing are identified in the DPD (Sections 1.2, 7, and 8). The potential interaction between the Project and Indigenous Peoples is also identified in Section 10 (Tables 10.1-3 and 10.1-4) and Appendix I. Teck is committed to engagement with participating Indigenous Peoples, in collaboration with the IAAC and the BC EAO, to develop understanding of Indigenous rights and uses that may be affected by the Project. Teck proposes to outline the approach for conducting the Indigenous interests assessment in the draft TISG/AIR.	• Section 1.2 • Section 7 • Section 8 • Section 10 (Tables 10.1-3 and 10.1-4) • Appendix I

Table B-1: Concordance Table for the Summary of Issues Identified through the Federal *Impact Assessment Act*

Element	Comment ID	Issue	Proponent Response[1]	Location in the DPD (Updated to concord with the Revised DPD)
Indigenous Peoples' Cultural, or Physical and Heritage	SOI-41	• Loss of cultural, historical, sacred and archeological sites and resources.	Concerns related to physical, spiritual, cultural heritage and use of land for traditional site or things of historical, spiritual or cultural importance were identified in the DPD (Sections 1.2, 7 and 8). The potential interaction between the Project and Indigenous Peoples is also identified in Section 10 (Tables 10.1-3 and 10.1-4) and Appendix I. Teck is committed to engagement with participating Indigenous Peoples, in collaboration with the IAAC and the BC EAO, to develop understanding of Indigenous rights and uses that may be affected by the Project. Teck proposes to outline the approach for conducting the Indigenous interests assessment in the draft TISG/AIR.	• Section 1.2 • Section 7 • Section 8 • Section 10 (Tables 10.1-3 and 10.1-4) • Appendix I
	SOI-42	• Impacts to culture, spirituality and Indigenous knowledge.		
	SOI-43	• Impacts to archaeological sites and participation of Indigenous nations in archaeological monitoring work.		
	SOI-44	• Concerns with the notification processes when artifacts are found during ground disturbance or while on the land in general.	Notification of the recording of archaeological sites is provided to First Nations representatives in-field, and to First Nations Bands and Nations following field work via the Letter of Notice and Heritage Inspection Permit interim reporting processes under the *Heritage Conservation Act* of BC.	-
Indigenous Peoples' Current Use of Lands and Resources	SOI-45	• Loss of access to, and sensory disturbance impacting preferred places, preferred species and resources, and preferred practices central to Indigenous use, language and identity.	Concerns related to spiritual and cultural heritage land and resource use for traditional purposes and sites or things of historic, archaeological, spiritual or cultural importance and the exercise of Aboriginal and Treaty rights of Indigenous peoples were identified in the DPD (Sections 1.2, 7, and 8). The potential interaction between the Project and Indigenous Peoples is also identified in Section 10 (Tables 10.1-3 and 10.1-4) and Appendix I. The information in the DPD is based on preliminary guidance from the BC EAO and IAAC on engagement with Indigenous Peoples. The scope and nature of that engagement may change as further guidance is provided. Teck is committed to engagement with participating Indigenous Peoples, in collaboration with the IAAC and the BC EAO, to develop understanding of Indigenous rights and uses that may be affected by the Project. Teck will outline the proposed approach for conducting the Indigenous interests assessment in the draft TISG/AIR.	• Section 1.2 • Section 7 • Section 8 • Section 10 (Tables 10.1-3 and 10.1-4) • Appendix I
	SOI-46	• Loss of access to ancestral territories for spiritual, cultural and subsistence uses.		
	SOI-47	• Loss of opportunity to carry out cultural practices, including teaching, traditional use and harvesting activities, fishing, hunting and gathering, in both the Project area and the surrounding area where Project effects may occur.		
	SOI-48	• Land and resource use for cultural purposes will be adversely affected by the Project's impacts on wildlife habitat, migratory birds, fish and fish habitat, as well as air and water quality and the ecological balance.		
	SOI-49	• Impacts to Indigenous people's ability to carry out important religious, legal and cultural practices.		
	SOI-50	• Impacts of contaminants in air and dust on the quality of, and confidence in (avoidance of), traditional foods, including plants, berries, and wild game.	Concerns related to effects to air quality as a result of the Project, and the potential for subsequent effects to food items and food security and/or confidence is identified in the DPD (Sections 1.2 and 7). The potential interaction between the Project and these aspects of the physical and human environment is also identified in Appendix I. The scope of the air quality and human health assessments will be proposed in the draft TISG/AIR. Teck will also propose that the Indigenous interests assessments to be undertaken consider the potential interaction between the Project and food security and/or confidence.	• Section 1.2 • Section 7 • Appendix I
	SOI-51	• Impacts to Indigenous stewardship of the lands and resources.	Concerns related to Indigenous land and resource stewardship are identified in the DPD (Sections 1.2 and 7). The potential interaction between the Project and Indigenous Peoples is also identified in Section 10 (Table 10.1-4). Teck is committed to engagement with participating Indigenous Peoples, in collaboration with the IAAC and the BC EAO, to develop understanding of Indigenous rights and uses that may be affected by the Project. Teck also proposes to outline the approach for conducting the Indigenous interests assessment in the draft TISG/AIR.	• Section 1.2 • Section 7 • Section 10 (Table 10.1-4)

Table B-1: Concordance Table for the Summary of Issues Identified through the Federal *Impact Assessment Act*

Element	Comment ID	Issue	Proponent Response[1]	Location in the DPD (Updated to concord with the Revised DPD)
Indigenous Peoples' Current Use of Lands and Resources (continued)	SOI-52	• Impacts of changes to water quality on the health and quality of fish.	Concerns related to effects to water quality and fish as a result of the Project are identified in the DPD (Sections 1.2, 7, and 8). The potential interaction between the Project and these aspects of the physical and biological environment is also identified in Section 10 (Table 10.1-2) and Appendix I. The scope of the water quality and aquatic health assessments will be proposed in the draft TISG/AIR.	• Section 1.2 • Section 7 • Section 8 • Section 10 (Table 10.1-2) • Appendix I
	SOI-53	• Impacts to the Oldman River system with cultural and environmental importance to Siksika Nation and Kainai Nation.	Teck acknowledges the interests expressed by the Siksika Nation and Kainai and has included this information in Sections 7.6 and 7.7 of the DPD. Teck will consider this comment in development of the draft TISG/AIR.	• Section 7.6 • Section 7.7
	SOI-54	• Cumulative effects in the region on country foods including water quality, air quality, and impacts to wildlife and their habitat, due to the high density of existing and proposed coal mining operations in the Elk Valley.	Concerns related to effects to air quality, water quality, wildlife and their habitat as a result of the Project, and the potential for subsequent effects to food items and food security and/or confidence is identified in the DPD (Section 1.2 and Section 7). The potential interaction between the Project and these aspects of the physical, biological and human environment is also identified in Section 10 (Tables 10.1-3 and 10.1-4) and Appendix I. The scope of the air quality, water quality, and human health assessments will be proposed in the draft TISG/AIR. Teck agrees that the assessments to be undertaken consider the potential interaction between the Project and food security and/or confidence of potentially affected Indigenous Peoples.	• Section 1.2 • Section 7 • Section 10 (Tables 10.1-3 and 10.1-4) • Appendix I
	SOI-55	• Impacts on Indigenous peoples' ability to harvest plants for food, medicinal and ceremonial purposes, including stems, leaves, roots and berries.	Concerns related to effects to traditional resource use as a result of the Project, including ability to harvest plants for traditional purposes is identified in the DPD (Section 1.2 and Section 7). The potential interaction between the Project, the biological environment and Indigenous Peoples is also identified in Section 10 (Tables 10.1-3 and 10.1-4) and Appendix I. Teck is committed to engagement with participating Indigenous Peoples, in collaboration with the IAAC and the BC EAO, to develop understanding of Indigenous rights and uses that may be affected by the Project. Teck proposes to outline the approach for conducting the Indigenous interests assessment in the draft TISG/AIR.	• Section 1.2 • Section 7 • Section 10 (Tables 10.1-3 and 10.1-4) • Appendix I
	SOI-56	• Cumulative impact of all projects in the area on the ability of Indigenous peoples to practice their rights now and in the future.	Concerns related to the Project's potential to contribute cumulative effects is identified in the DPD (Sections 1.2, 7 and 8). As indicated in Section 10, the assessment will include consideration of residual incremental and cumulative effects associated with the Project and other past, present and reasonably foreseeable developments. The scope of the cumulative effects assessment will be proposed in the draft TISG/AIR and can be used to support the Indigenous interests assessment for the Project.	• Section 1.2 • Section 7 • Section 8 • Section 10

Table B-1: Concordance Table for the Summary of Issues Identified through the Federal *Impact Assessment Act*

Element	Comment ID	Issue	Proponent Response[1]	Location in the DPD (Updated to concord with the Revised DPD)
Indigenous peoples' Aboriginal and Treaty Rights	SOI-57	• Impacts on the exercise of Aboriginal and Treaty rights and related cultural practices.	With regard to cumulative effects assessment regarding the exercise of Aboriginal and Treaty rights and related cultural practices, please refer to SOI-56.	• See SOI-56
	SOI-58	• Adverse effects, such as to wildlife habitat, migratory birds, and fish and fish habitat and environmentally sensitive habitats including grassland and brushland ecosystems, avalanche path ecosystems, Karst ecosystems, Bighorn Sheep winter range and Westslope Cutthroat Trout habitat, endangered ecological communities, mature and old growth forests, and wetlands, could impact the exercise Aboriginal and Treaty rights and related cultural practices.	Concerns related to effects to environmentally sensitive areas, terrestrial and aquatic wildlife and the exercise of treaty rights and cultural practices and transmission of knowledge were identified in the DPD (Sections 1.2, 7 and 8). The potential interaction between the Project, the biological environment and Indigenous Peoples is also identified in Section 10 (Tables 10.1-3 and 10.1-4) and Appendix I. Teck is committed to engagement with participating Indigenous Peoples, in collaboration with the IAAC and the BC EAO, to develop understanding of Indigenous rights and interests that may be affected by the Project. Teck will propose the scope of the aquatic and terrestrial assessments in the draft TISG/AIR, including assessment of fish and fish habitat, wildlife and wildlife habitat, ecosystems and vegetation. Teck will also outline the proposed approach for conducting the Indigenous interests assessment in the draft TISG/AIR. With regard to cumulative effects assessment regarding the exercise of Aboriginal and Treaty rights and related cultural practices, please refer to SOI-56.	• Section 1.2 • Section 7 • Section 8 • Section 10 (Tables 10.1-3 and 10.1-4) • Appendix I
	SOI-59	• Significant and unsustainable cumulative impacts of coal mining and resource extraction, logging and development taking of lands and subsequently altering the landscape, diminishing the ability to exercise Aboriginal and Treaty rights and related intergenerational transfer of culture, knowledge, practices and language.		
Migratory Birds and their Habitat	SOI-60	• Impacts to migratory birds, including their habitat, from Project activities leading to destruction, disturbance and fragmentation of habitat (e.g., foraging, nesting), habitat avoidance, sensory disturbance and the inadvertent disturbance and destruction of individuals, nests and eggs.	Concerns related to impacts to migratory birds were identified in the DPD (Section 7). The potential interaction between the Project and migratory birds is also identified in Appendix I. The scope of the wildlife and wildlife habitat assessments, including the assessment of aquatic and terrestrial wildlife health, will be proposed in the draft TISG/AIR and will consider potential effects to migratory birds, such as those protected under the *Migratory Birds Convention Act*. Teck notes that the species identified in SOI-63 are not necessarily reliant on grasslands, and are not listed under the *Species at Risk Act*.	• Section 7 • Appendix I
	SOI-61	• Impacts to migratory bird species reliant on aquatic environments currently affected by selenium and other pollutants (e.g., embryotoxicity and reproductive deformities), including the Spotted Sandpiper, American Dipper, Harlequin Duck, Northern Waterthrush, Varied Thrush, and Canada Goose.		
	SOI-62	• Impacts to Rocky Mountain Flyway, an internationally important habitat area for migratory birds.		
	SOI-63	• Impacts to migratory bird species reliant on grasslands, including raptors, Black-backed and Three-toed Woodpeckers, Brown Creeper, Northern Flicker and Pacific Wren are protected under the *Species at Risk Act*.		

Table B-1: Concordance Table for the Summary of Issues Identified through the Federal *Impact Assessment Act*

Element	Comment ID	Issue	Proponent Response[1]	Location in the DPD (Updated to concord with the Revised DPD)
Project Design	SOI-64	• Uncertainty around the duration of project phases including operations, reclamation, closure, and post-closure and the lifespan of existing infrastructure.	The FRX Project would be an extension to FRO's mining area that would extend the life of the mining operation from the mid-2020s through to the early 2070s. The schedule of the various phases of the Project was provided in the DPD (Section 5.1.5). The Project will extend the life span of existing FRO infrastructure such as processing plant, access roads, power lines, gas lines, and rail line, which will be used for the Project.	• Section 5.1.5
	SOI-65	• Inadequate level of detail to understand mitigation measures and adverse effects.	The description of Project components and activities has been updated since the IPD and 2021 DPD with additional details in Section 4 of the DPD. Additional information regarding the management of water, waste and air emissions is presented in Sections 5.3.4, 5.4.1 and 5.4.2 and potential mitigation measures have been further identified in Section 10 and Appendix I. The full list of mitigations measures to be included in the Project will be documented in the IS/A once the effects assessment results are available to support their development.	• Section 4 • Section 5.3 • Sections 5.4.1 and 5.4.2 • Section 10 • Appendix I
	SOI-66	Lack of consideration of alternative means to the Project, including a smaller, shallower mine with a shorter lifespan.	A summary of alternative means of carrying out the Project that were considered by Teck is presented in Section 4 of the DPD. This section has been updated since the IPD and 2021 DPD was published. Teck's evaluation of alternative pit shells including a smaller, shallower mine pit with a shorter lifespan was considered is presented in Section 4.1.	• Section 4.1
	SOI-67	• Lack of consideration of alternatives to the Project, including alternative methods of making steel.	Teck's consideration of potential alternatives to the Project, including the ability of those alternatives to meet the need and purpose of the Project and/or information on their technical/economic feasibility, was discussed in Section 3 of the DPD. Alternative methods of making steel is outside the scope of the Project.	• Section 3
Public Engagement	SOI-68	• Create opportunities for virtual public engagement sessions designed to allow all participants to speak, to engage with each other, and discuss conflicting evidence about the Project.	Teck has and will continue to engage through a variety of methods as outlined in the DPD (Section 8) including teleconferences and a website dedicated to the Project: https://www.glencore.ca/en/evr/fording-river-extension.	• Section 8
Reclamation	SOI-69	• Inadequate reclamation at the existing Fording River Operations site.	Teck's approach to reclamation for the Project is presented in the DPD (Section 5.6). The Project's reclamation and closure plans will include progressive and interim reclamation and will be outlined in more detail in the IS/A. FRO has a history of commissioning reclamation research and continues to incorporate learnings from our existing reclamation and management efforts (refer to Sections 9.1.2 and 9.1.3). As part of the draft TISG/AIR, Teck will propose that monitoring to address uncertainty and/or confirm mitigations are effective be proposed in the IS/A. Teck also anticipates that monitoring and reporting requirements will be imposed in the permits required for the Project, should it be approved.	• Section 5.6 • Sections 9.1.2. and 9.1.3
	SOI-70	• Teck's ongoing environmental stewardship and reclamation commitments and initiatives may be sufficient, including the Elk Valley Water Quality Plan and investments in water quality research and development.		
	SOI-71	• Concerns about the proponent's fisheries restoration initiatives, and the legacy of accountability during reclamation.		
	SOI-72	• Concerns about sufficiency of information provided on reclamation including plans for long-term water treatment and estimated costs of financial assurance.		
	SOI-73	• Benefits of the Project's proposed reclamation efforts and forward-thinking technologies that would be consistent with ongoing efforts for existing mines in the Elk Valley to reclaim and rehabilitate lands impacted by mining.		

Table B-1: Concordance Table for the Summary of Issues Identified through the Federal *Impact Assessment Act*

Element	Comment ID	Issue	Proponent Response[1]	Location in the DPD (Updated to concord with the Revised DPD)
Social Conditions	SOI-74	• Loss of access to areas used for recreational purposes.	Concerns related to effects to fish and wildlife as a result of the Project are identified in the DPD in Section 1.2, and concerns about what such effects could mean to recreational use, tourism is indicated in Section 8. The potential interaction between the Project and the biological and human environment is indicated in Appendix I. Teck will propose the scope of the wildlife, land use and socio-economic assessments in the draft TISG/AIR, with consideration of these comments.	• Section 1.2 • Section 8 • Appendix I
	SOI-75	• Effects of declining fish populations to the local tourism industry, including fly fishing tourism.		
	SOI-76	• Effects to hunting guides from changes to wildlife populations.		
Species at Risk and their Habitat	SOI-77	• Impacts to federally listed Species at Risk, including their habitat, as a result of habitat loss, alteration and fragmentation, direct and indirect mortality, environmental emergencies, sensory disturbance and functional habitat loss and introduction of invasive species.	Concerns related to effects to species at risk and ecologically sensitive areas as a result of the Project are identified in the DPD (Sections 1.2, 7, and 8). The potential interaction between the Project and the biological environment is also identified in Section 10 (Table 10.1-1) and Appendix I. The scope of the vegetation, wildlife, and fish and fish habitat assessments will be proposed in the draft TISG/AIR. Teck will also propose the assessment of malfunctions and accidents and effects of the environment on the Project in the draft TISG/AIR.	• Section 1.2 • Section 7 • Section 8 • Section 10 (Table 10.1-1) • Appendix I
	SOI-78	• Potential adverse effects to Species at Risk reliant on high-elevation grasslands, high-elevation mountain slopes, connectivity corridors, mature and old growth forest, and wetlands.		
	SOI-79	• Threats to species listed in the *Species at Risk Act* and their habitat, including Grizzly Bear (special concern), American Badger (endangered), Olive-sided Flycatcher (threatened), Barn Swallow (threatened), Bank Swallow (threatened), Western Toad (special concern) and Whitebark Pine (endangered).		
	SOI-80	• Threats to downstream endangered fish populations, including Westslope Cutthroat Trout and White Sturgeon.	Refer to SOI-34.	
	SOI-81	• Inadequate reclamation efforts and plans to date for the Project, both in general and with a focus on critical habitat for Species at Risk	Refer to SOI-69 through SOI-73.	
Sustainability	SOI-82	• Need for environmentally sustainable and socially responsible mining projects to meet ongoing global demand for steel and the development of sustainable infrastructure, such as renewable energy infrastructure.	This comment is identified in the DPD in Sections 1.2, 7 and 8. Teck is committed to responsible business practices. Key sustainability polices are presented in the DPD (Section 1.3.3) and the potential benefits of the Project are presented in Section 5.1.4 of the DPD. Refer also to Section 5.4.2 for discussion of Teck's use of renewable energy and management of greenhouse gas emissions. In the draft TISG/AIR, Teck will propose that the IS/A further outline the Project's contributions to sustainability.	• Section 1.2 • Section 1.3.3 • Section 5.1.4 • Section 5.4.2 • Section 7 • Section 8

Table B-1: Concordance Table for the Summary of Issues Identified through the Federal *Impact Assessment Act*

Element	Comment ID	Issue	Proponent Response[1]	Location in the DPD (Updated to concord with the Revised DPD)
Transboundary Effects	SOI-83	• Transboundary effects in the United States (U.S.) and traditional Tribal territory of U.S. Tribes including elevated selenium and nitrogen, as well as impacts to aquatic resources in the Elk River, Koocanusa Reservoir, the Kootenai River, and the Kootenai watershed in Idaho and Montana.	Concerns related to transboundary environments through changes to air quality, fish and fish habitat, water quality, migratory birds, species at risk and Indigenous Peoples were identified in the DPD (Sections 1.2, 7 and 8). The potential interaction between the Project, the physical environment, the biological environment and indigenous Peoples is also identified in Section 10 and Appendix I. In the draft TISG/AIR, Teck will propose that the assessment of the Project consider the potential for both direct and cumulative effects to areas of federal jurisdiction, including the potential for effects to transboundary (Alberta and US) environments through changes to air quality, fish and fish habitat, water quality, migratory birds, species at risk and Indigenous Peoples. The geographic and temporal scope of the assessment will be proposed in the TISG/AIR.	• Section 1.2 • Section 7 • Section 8 • Appendix I
	SOI-84	• Transboundary impacts of the Project in the U.S. from water pollution to fish populations and fish habitat downstream in the Koocanusa Reservoir and into the U.S. Kootenai River.		
	SOI-85	• Transboundary impacts to White Sturgeon in the Kootenai River.		
	SOI-86	• Inclusion of transboundary environments in assessment study areas.		
	SOI-87	• Transboundary effects in Alberta, including from selenium pollution and on wide-ranging species and their habitat spanning Alberta-B.C. such as Bighorn Sheep, Grizzly Bear and Wolverine.		
	SOI-88	• Transboundary impacts of the Project from greenhouse gas emissions, including combustion of coal produced from the Project.		
Transportation	SOI-89	• Impacts from the transportation of coal by road and rail, including impacts on wildlife.	Potential effects to the biophysical and human environment due to coal and mine rock hauling within FRO and the Project area will be evaluated as part of the assessment of the Project. Clean coal from the Project would continue to be transported through the existing rail network via FRO's existing rail loop facility. Rail transport is the responsibility of the railway company and is outside the scope of the Project.	-
	SOI-90	• Impacts from coal spills transported by rail into waterways along the rail route.		
Water	SOI-91	• Negative impacts of the project on groundwater and surface water quality and quantity from mining activities including accidental releases.	Concerns related to effects groundwater and surface water quality as a result of the Project were identified in the DPD (Section 1.2, 7 and 8). The potential interaction between the Project and these aspects of the physical environment is also identified in Section 10 (Table 10.1-2) and Appendix I. The scope of the surface and ground water assessments, including temporal scope, will be proposed in the draft TISG/AIR.	• Section 1.2 • Section 7 • Section 8 • Section 10 (Table 10.1-2) • Appendix I
	SOI-92	• Nitrate levels flowing from waste rock dumps could be above provincial and federal guidelines for decades after mining ends.		
	SOI-93	• Ground and surface water quality concerns due to an inability to capture and treat increased inputs of contaminants such as selenium and nitrates. • Ground and surface water quantity concerns from water usage at the Project and water seepage, combined with drying effects from climate change.		

Table B-1: Concordance Table for the Summary of Issues Identified through the Federal *Impact Assessment Act*

Element	Comment ID	Issue	Proponent Response[1]	Location in the DPD (Updated to concord with the Revised DPD)
Water (continued)	SOI-94	• Effectiveness of mitigation of effects to water quality including unproven technology that lacks independent verification of effectiveness, including the unproven Saturated Rock Fill technology with little public information available on its functionality and reliability.	The Project's water quality mitigation planning will leverage Teck's existing water quality management experience, including incorporating learnings from ongoing operations, research and development, regional and local monitoring and adaptive management (for example refer to programs for the Elk Valley Permit as listed in Section 9.1 of the DPD). Planning for the Project will include advancing the use of new and innovative technologies where they are technically and economically feasible for use in the Elk Valley. The proposed water quality management plan for the Project is included in the DPD (refer to Sections 4.7 and 5.3.4).	• Section 4.7 • Section 5.3.4 • Section 9.1
	SOI-96	• Need for evidence-based water treatment measures for effective water treatment.		
	SOI-97	• Concerns with using unproven technology for water quality treatment that may not prove effective and that has little public information available to verify the volume of wastewater treated.		
	SOI-95	• Concerns regarding coordinated efforts to improve water quality in the Elk Valley.	Concerns about water have been identified in Sections 1.2, 7 and 8 of the DPD. Teck acknowledges concerns about water quality in the watersheds of the Elk Valley and in Koocanusa Reservoir and has developed and is implementing the Elk Valley Water Quality Plan and various related regional initiatives, plans and programs as noted in the DPD (Sections 4.7, 5.3.4 and 9.1). The Project, if approved, including the Project-specific plan for water quality management, would be incorporated into a subsequent Elk Valley Water Quality Plan implementation plan adjustment.	• Section 1.2 • Section 4.7 • Section 5.3.4 • Section 7 • Section 8 • Section 9.1
	SOI-98	• Need for government transparency, oversight and enforcement of water quality standards at Elk Valley mines.		
	SOI-99	• Potential non-compliance with water quality objectives in the Elk Valley Water Quality Plan.		
	SOI-101	• Concerns with regulatory mechanisms that have not adequately regulated water pollution from active mining projects in the Elk Valley.		
	SOI-102	• Concerns that the provincial regulatory system will not adequately protect the watershed.		
	SOI-100	• Potential non-compliance with the Boundary Waters Treaty.	The Boundary Waters Treaty is identified in Appendix D of the DPD. This comment will be considered in the development of the draft TISG/AIR.	• Appendix D
	SOI-103	• Concerns over the need to consider the Coal Mining Effluent Regulations that are being developed by Environment and Climate Change Canada.	Teck understands that CMER is being developed and agrees that the need to comply with those requirements may need be acknowledged in the assessment. However, the terms and timing of coming into force are not yet certain. Teck acknowledges that once the requirements of CMER are understood and more certain, it may be necessary to address those requirements for the Project.	-
	SOI-104	• Concerns about impacts to Ktunaxa tradition and practice of rights from Project effects to water and water flow, which have an inherent right and value to Ktunaxa Nation, and affect Ktunaxa assessment of traditional knowledge, language, economic, social, education, employment, lands, and resources, among others.	Concerns related to effects to Ktunaxa traditional uses of the land (physical, spiritual, cultural, current use of land and resources for traditional purposes, health, social or economic conditions and to the exercise of Aboriginal and Treaty rights) related to changes to water as a result of the Project were identified in the DPD (Section 7.1). The potential interaction between the Project, water and Indigenous Peoples was indicated in Section 10 (Table 10.1-3). Teck and the Ktunaxa Nation Council are engaging on the approach to assessment of water. Teck proposes to outline the approach for conducting the Indigenous interests assessment in the draft TISG/AIR.	• Section 7.1 • Section 10 (Table 10.1-3)
	SOI-105	• Need for adequate water quality monitoring at the site location, and upstream and downstream of the Project.	Teck acknowledges concerns about water quality in the watersheds of the Elk Valley and in Koocanusa Reservoir and has developed and is implementing the Elk Valley Water Quality Plan and various related regional initiatives, plans and programs as noted in the DPD (Sections 4.4, 5.3.4 and 9.1.2). The Project, if approved, including the Project-specific plan for water quality management, would be incorporated into a subsequent Elk Valley Water Quality Plan Model update and Implementation Plan Adjustment. The scope of the water quality assessment including evaluating the need for follow up and monitoring strategies will be proposed in the draft TISG/AIR.	• Section 4.4 • Section 5.3.4 • Section 9.1.2

Table B-1: Concordance Table for the Summary of Issues Identified through the Federal *Impact Assessment Act*

Element	Comment ID	Issue	Proponent Response[1]	Location in the DPD (Updated to concord with the Revised DPD)
Wetlands	SOI-106	• Effects to wetlands along the Fording River and Kilmarnock Creek through construction and changes to water quality, including wetland loss, reduction, alteration and change in wetland function	Concerns related to effects to wetlands as a result of the Project, including potential effects to wetland habitat for migratory birds and other wildlife are identified in the DPD (Sections 1.2 and 7). The potential interaction between these aspects of the physical and biological environment and the Project are also identified in Appendix I. The scope of the ecosystems and vegetation assessment, and the assessment of other valued components (VCs/VC subcomponents) that may be affected by changes to wetlands, will be proposed in the draft TISG/AIR.	• Section 1.2 • Section 7 • Appendix I
	SOI-107	• Effects to wetland communities and ecological functions, thereby also affecting the availability and/or quality of wetland habitat for migratory birds and other wildlife		

Appendix C: Legal Description of Lands to be Used for the Project

C1.0 Legal Description of Lands to be Used for the Project

Those lands held as an Estate in Fee Simple by EVR Operations Limited: Block A, District Lots 3454 and 16964, Kootenay District; Lot 1, District Lot 4588, Kootenay District, Plan 11279, except Plans RW 572, 12976, NEP70655 and NEP70656.

Those lands held as an Estate in Fee Simple by Canadian Pacific Limited: That part of District Lot 3373, Kootenay District, included in Plan RW 563; District Lot 3345, Kootenay District, as shown on Plan RW 563.

Those lands held by The Crown in Right of British Columbia: District Lots 6642, 6710, 6709, 6708, 6646, 6706, 6700, 6701, 6702, 6703, 6698, 6638, 6697, 6696, 6695, 6694, 6637, 6688, 6689, 6690, 6691, 6687, 6686, 6685, 6684, 6728, 6729, 6733, 6732, 6734 and on unsurveyed ground commencing at the southwest corner of Lot 6687; thence due north to the northwest corner of Lot 6687; thence due west to the northeast corner of Lot 6635; thence due south to the southeast corner of Lot 6635; thence due east to the southwest corner of Lot 6687 being the point of commencement.

Appendix D: Agreements Potentially Relevant to the Assessment Process

D1.0 Agreements Potentially Relevant to the Assessment Process

Agreements that will help guide engagement between the Government of British Columbia and the Ktunaxa Nation Council (KNC) include the following (Government of British Columbia 2019a):

- Ktunaxa Nation Strategic Engagement Agreement (KNC 2019)

Agreements that will guide engagement between the provincial government, the federal government and other governments include:

- Impact Assessment Cooperation Agreement between Canada and British Columbia (Government of Canada 2019)
- Memorandum of Understanding and Cooperation on Environmental Protection, Climate Action and Energy between The Province of British Columbia and The State of Montana (BC and Montana 2010)

Canada has also committed to a number of other international conventions and agreements that pertain to various environmental topics and issues. While not an exhaustive list, the following presents agreements of relevance to the Project:

- The Boundary Waters Treaty between Canada and the United States (US and GB 1909) and the Columbia River Treaty between Canada and the United States (Canada and US 1961)
- Agreement between the Government of Canada and the Government of the United States on Air Quality (Canada and US 1991)

Additionally, in March, 2023, Canada and the United States reached an understanding on next steps to further bilateral cooperation to reduce and mitigate the impacts of water pollution in the Elk-Kootenay watershed through the International Joint Commission (IJC) (Government of Canada 2024). On September 26, 2024, the IJC established a Study Board and issued its Directive (IJC 2024).

The key elements of this understanding are as follows:

1. Canada and the United States, in partnership with Tribal Nations and Indigenous Peoples, and in a manner consistent with the principles outlined in the United Nations Declaration on the Rights of Indigenous Peoples, have asked the International Joint Commission (IJC), through a joint reference, to assist federal and Indigenous governments, British Columbia, Idaho and Montana, to establish a formal governance structure by June 30, 2024, allowing for co-development of options for future action.

2. Considering the particular complexity of pollution concerns in this watershed, Canada and the United States have also asked the IJC to establish a two-year Study Board to convene experts and knowledge holders to conduct transparent and coordinated transboundary data and knowledge sharing.

As noted in Sections 1.2.5, 7.1.2 and 7.2, the Project is subject to the Impact Management and Benefits Agreement (IMBA) established between EVR and the Ktunaxa Nation. The Ktunaxa Nation and EVR have also signed a Joint Management Agreement for Conservation Lands.

As noted in Section 1.2.5, in February 2024, the Yaq̓it ʔa·knuqƚi ’it First Nation and Teck (now EVR) announced the signing of a Relationship Charter, which formalizes the commitment of both parties to develop and sustain a strong working relationship, and a Stewardship Agreement, which outlines collaboration on environmental and cultural stewardship projects. The Relationship Charter establishes a path forward to collaboratively advance responsible mining and land stewardship within Qukin ʔamakis (the Elk Valley). Yaq̓it ʔa·knuqƚi ‘it and EVR have committed to continued collaboration and engagement (Teck 2024).

In addition to the above engagement, in May 2024, Yaqan nu?kiy and Teck (now EVR) entered into an Interim Relationship and Funding Agreement with the aim of advancing priority socio-economic, environmental and cultural stewardship projects, while strengthening the working relationship between the parties. Due to limited uptake to date, that agreement is likely to be revisited/revised in the near future. Subsequently in May 2024, ʔakisq̓nuk and Teck (now EVR) entered into a similar Interim Relationship and Funding Agreement which has been more substantially acted upon.

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Appendix E: Existing Studies and Ongoing Investigations

Table of Contents

E1.0 Information Available Prior to the Initiation of the Project E-1
E1.1 Physical Environment E-1
E1.2 Biological Environment E-7
E1.3 Human Environment E-18
E2.0 Data Collection Specific to the Project E-24
E2.1 Air Quality E-24
E2.2 Noise and Vibration E-24
E2.3 Hydrogeology E-24
E2.4 Hydrology E-25
E2.5 Water Quality E-25
E2.6 Aquatic Health E-25
E2.7 Fish and Fish Habitat E-25
E2.8 Surficial Geology, Terrain, and Soils E-26
E2.9 Ecosystems and Vegetation E-27
E2.10 Wildlife E-27
E2.11 Human and Terrestrial Wildlife Health E-32
E2.12 Socio-Economic, Land and Water Resources Use, and Visual Aesthetics E-33
E2.13 Geochemistry E-35
E2.14 Archaeology E-35
E3.0 References E-36

E1.0 Information Available Prior to the Initiation of the Project

A list of information available for the Fording River Extension Project (FRX Project, or the Project) area, before the initiation of the Project, is provided in Sections E1.1 to E1.3 below. This list provides an assessment of information available to the Project area for early engagement and for understanding what information is available regarding existing conditions. The list below is not intended to be considered complete; as the Project progresses, if new information becomes available it will be assessed for relevance and included as appropriate.

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E2.0 Data Collection Specific to the Project

The surveys conducted or planned in support of the Project to characterize existing conditions and inform the environmental assessment process (valued component selection, effects assessment, etc.) are summarized below. These surveys are specific to the Project and do not include regional or operational programs, although information from those will be assessed for relevance and included as appropriate in the characterization of existing conditions.

E2.1 Air Quality

- Meteorological and air quality data collection from EVR monitoring network, from the regional network operated by the BC Ministry of Environment and Climate Change Strategy, as well as other from other sources (for example, Environment Canada).
- Air quality data/greenhouse gas emissions data collected from existing operations and EVR's Fording River and Greenhills operations in accordance with the Water and Air Baseline Monitoring Guidance Document for Mine Proponents and Operations (BC MOE 2016) and BC Field Sampling Manual (BC MECCS 2020).

E2.2 Noise and Vibration

- Noise and vibration baseline monitoring program to establish current conditions at locations identified as sensitive receptors based on guidance from the BC Oil and Gas Commission (BC OGC 2018).

E2.3 Hydrogeology

- Drilling programs to install groundwater monitoring wells along the base of the west flank of Castle Mountain and Chauncey Creek alluvial fan, as well as installation of background monitoring wells in the Chauncey Creek watershed.
- Retrofitting exploration boreholes with monitoring wells screened in bedrock and using these wells to measure seasonal variation of bedrock groundwater levels along Castle Mountain to support groundwater numerical model calibration, as well as to collect groundwater quality and isotopes data to support the hydrogeological conceptual site model.
- Recurring quarterly groundwater monitoring and sampling program in accordance with the Water and Air Baseline Monitoring Guidance Document for Mine Proponents and Operations (BC MOE 2016).
- Five flow (including two load) accretion studies (Chauncey Creek and associated tributaries).
- Site visit to Chauncey Creek and Castle Mountain to identify seeps.
- Geophysics (seismic refraction and electrical resistivity tomography) transects along the Chauncey Creek valley bottom to support hydrogeological conceptual site model and characterization of groundwater-surface water interaction.
- Drive-point piezometer and thermal array installations and seeps and surface water quality monitoring along Chauncey Creek valley bottom to support characterization of groundwater-surface water interaction.
- Incorporating data from numerous complementary hydrogeology related programs conducted in the vicinity of the Project.

E2.4 Hydrology

- Data collection from routine flow monitoring at existing flow monitoring stations on watercourses potentially affected by the Project in order to acquire data recommended by the Water and Air Baseline Monitoring Guidance Document for Mine Proponents and Operators (BC MOE 2016). Hydrometric data collection is carried out in accordance with EVR Flow Monitoring Protocol (KWL 2017) and provincial standards (BC ENV 2018).
- Fluvial geomorphology data collection at watercourses that could potentially be affected by the Project, in accordance with the Rosgen Stream Classification (Rosgen and Silvey 1998) and the British Columbia Channel Assessment Procedure (FPCBC 1996).
- Installation of a weather station in Chauncey Creek for the purpose of collecting precipitation data within the Chauncey Creek catchment, located on the southeast side of Castle mountain.

E2.5 Water Quality

- Data collection from routine water quality monitoring at existing water quality stations potentially affected by the Project in accordance with the Water and Air Baseline Monitoring Guidance Document for Mine Proponents and Operations (BC MOE 2016).

E2.6 Aquatic Health

- Aquatic biota tissue selenium data compiled from EVR's existing monitoring programs in the vicinity of the Project (e.g., Regional Aquatic Effects Monitoring Program, Fording River Operations Local Aquatic Effects Monitoring Program).
- Benthic invertebrate and/or fish tissue collection to assess tissue chemistry data for aquatic receptors (2019, 2021, 2022, 2024). Samples collected in accordance with the Study Design for the Regional Aquatic Effects Monitoring Program, 2021 to 2023 (Minnow 2021), the Study Design for the Regional Aquatic Effects Monitoring Program, 2024 to 2026 (Minnow 2024), and the Water and Air Baseline Monitoring Guidance Document for Mine Proponents and Operations, Version 2 – June 2016 (BC MOE 2016).

E2.7 Fish and Fish Habitat

- Spawning and fish presence and abundance (angling, minnow traps, electrofishing, environmental DNA) surveys to determine fish species and life stage distribution in tributaries that drain the Project area and seasonal habitat use in the Project area in accordance with the Resources Inventory Standards Committee (RISC) 1:20,000 methods (RIC 2001a, RISC 2008a).
- Fish habitat surveys on watercourses within the Project footprint and the Local Study Area. The methods employed will be the RISC 1:20,000 methods (RIC 2001a, 2008b) and the Fish Habitat Assessment Procedure Level 1 (Johnston and Slaney 1996).
- Assess barriers to fish passage under different flow conditions. There is no single recognized, or RISC-certified, assessment methodology available to identify barriers to fish passage. Obstacles will be assessed based largely on the methodology for assessing falls and chutes (cascades) provided in Blackburn et al. (2021) and Reiser et al. (2006), with supplementary information provided in Parker (2000).

- Document calcite conditions in tributaries not previously surveyed using EVR's Calcite Index (CI) measurement protocol to provide a CI score (Robinson and MacDonald 2014).
- Instream flow assessments in accordance with the provincial assessment guidelines (Lewis et al. 2004).
- Critical riffle assessments following the California Department of Fish and Wildlife (CDFW 2017) guidance.
- Benthic invertebrate community sampling consistent with the Regional Aquatic Effects Monitoring Program (Minnow 2020, 2023) and CABIN (Environment Canada 2012) methods with 3-minute kick samples collected at each site.
- Periphyton productivity (chlorophyll-a) and biomass (ash free dry mass) sampling in the Chauncey Creek watershed in accordance with the BC Field Sampling Manual (BC MWLAP 2003).
- Water temperature and in-situ water quality sampling in accordance with the BC Field Sampling Manual (BC MWLAP 2003).

E2.8 Surficial Geology, Terrain, and Soils

Terrain and Soils

- Terrain field classification was undertaken in accordance with Terrain Classification System for British Columbia (Howes and Kenk 1997). This is a system for the classification of surficial materials, landforms, and geological processes of BC; the Terrain Classification System is based upon a classification system designed for mountainous terrain originally introduced by R. J. Fulton of the Geological Survey of Canada.
- Soils field data collection was undertaken in accordance with the Soil Inventory Methods for British Columbia (RIC 1995). This describes methods for soil field data collection and mapping standards for the province of BC.
- Soil classification was undertaken in accordance with the Canadian System of Soil Classification (Soil Classification Working Group 1998). This describes the soil classification system for Canada.
- Terrain and soils were described as outlined in Field Manual for Describing Terrestrial Ecosystems, 2nd Edition (BC MOFR and BC MOE 2010). This describes details to assist field surveyors in completing Provincial Ecosystem Field Forms that enable the collection of data for ecosystem inventories including site descriptions, vegetation, and site visit forms.

Terrestrial Ecosystem Mapping

- Bioterrain data collection to support terrestrial ecosystem mapping (TEM) was undertaken in accordance with the Standard for Terrestrial Ecosystem Mapping (TEM) - Digital Data Capture in British Columbia (RIC 2000). This describes the procedures for capturing, storing, and distributing digital data for TEM and enables consistency among data collectors and for compatibility with Geographic Information System (GIS) and other provincial databases.
- Ecosystem and terrain and soil data collection to support TEM (BC Ministry of Forests and Range and BC Ministry of Environment 2010).

E2.9 Ecosystems and Vegetation

- Ecosystem and vegetation data collection to support TEM (BC Ministry of Forests and Range and BC Ministry of Environment [BC MOFR and BC MOE] 2010; RIC 1998a).
- Ecological communities at risk surveys (BC Ministry of Forests and Range and BC Ministry of Environment 2010).
- Wetland function assessment surveys (BC Wildlife Federation and BC Ministry of Forests, Range, Natural Resource Operations and Rural Development 2021; Fletcher et al. 2021).
- Plant species at risk surveys (RISC 2018).
- Surveys to document the presence, distribution, and density of noxious weeds and invasive plants (BC MFLNRORD 2010).
- Surveys to collect data on the distribution, abundance, and quality of whitebark pine (RISC 2018; Tomback et al. 2005).
- Surveys to collect data on wildlife trees and coarse woody debris (BC MOFR and BC MOE 2010).
- Pre-disturbance surveys for plant species (RISC 2018, BC Ministry of Forests and Range and BC Ministry of Environment 2010), ecological communities at risk (BC MOFR and BC MOE 2010), and invasive plants (BC MFLNRORD 2010), in support of exploration activities for the Project.

E2.10 Wildlife

Winter Tracking

- Winter track surveys undertaken based on provincial standards (RIC 1998b, 1998f, 1999a, 2006), with the objective being to assess the presence, relative abundance and habitat use by mammalian carnivores and ungulates in winter. Surveys conducted under suitable winter conditions (i.e., at least 24 hours after a minimum snowfall of 2 cm to allow time for animals to move and make tracks).

Remote Camera Monitoring

- Remote camera data collected according to EVR's Regional Wildlife Monitoring Program (Teck 2020), relying primarily on a stratified random design. Cameras deployed in a variety of landscape strata, habitat types and at various distances to active mining and other human activity, and reclaimed areas.
- Reconyx PC800 and PC900 HyperFire Professional Semi-Covert IR cameras set up to collect data year-round over multiple years.
- Cameras programmed to capture images 24 hours/day and to take two pictures as fast as possible with a one-second delay between triggers (i.e., motion photographs), following EVR's Remote Camera Deployment and Data Entry Manual (Teck 2019).
- Each motion-trigged photograph is reviewed to determine if wildlife or humans are captured in the image. If an image captured wildlife, the species is identified. All individuals appearing in the photographs are counted. Individuals appearing for the first time are counted as "new" individuals. If the same individual is captured in subsequent photographs, the individual in the photograph being interpreted is counted as "same". Individuals are counted as "same" for as long as they remain in a string of continuous photographs. However, if an individual leaves the field of view of the camera for greater than five minutes and then returns, the individual is again considered "new".

- A photograph rate is determined for each species for use in subsequent analysis by calculating the number of active camera days for each camera, then dividing the total number of "new" observations of the species at that camera location by the number of days the camera was active.

Badger and Ground Squirrel Surveys

- Foot-based burrow surveys based on presence/not-detected survey protocol (RIC 2007) and following the guidance in EVR's American Badger Species Management Plan (Teck 2016a). Surveys conducted in the spring when badgers are active, but vegetation does not obstruct burrows, maximizing detectability. Ground squirrel surveys completed in conjunction with badger burrow surveys. Surveys target appropriate habitat (e.g., grassland habitat on south slopes).

Grizzly Bear Denning Habitat Assessment

- Field assessment of areas of the Project footprint and vicinity identified as high suitability grizzly bear denning habitat based on the habitat suitability index (HSI) model described in the Grizzly Bear Denning Management Plan (Teck 2016b) to confirm model predictions. This information will be used to focus the spring and fall denning surveys conducted closer to the date of disturbance to identify active den locations that may require mitigation.

Bat Acoustic Surveys

- Acoustic bat detectors deployed in suitable habitat to identify areas with relatively higher activity levels (as an indication of high suitability habitats).
- Detector deployment informed by a field reconnaissance undertaken to complete a high-level assessment of habitat suitability for day roosts (i.e., structural stages five to seven) and maternity roosts (i.e., structural stages six and seven) to identify candidate locations for acoustic bat detectors. Detectors deployed during the field reconnaissance program (May) and relocated monthly to other candidate locations identified during the field reconnaissance, with final retrieval in October.
- Follow-up 2-year continuous acoustic monitoring program at stationary locations to monitor temporal changes in activity.

Riverine Bird and River Otter Surveys

- Survey procedures based on those described in the provincial protocols (RIC 1998e), consisting of a river shoreline transect survey along watercourses capable of supporting breeding riverine birds. The census technique involves walking along the watercourse and recording bird occurrences for the inventoried reaches. A riparian habitat assessment also conducted according to the procedures outlined by the BC MOE (1995).
- River otter surveys completed in conjunction with riverine bird surveys. Surveys consist of visual searches for river otter individuals or sign (dens, latrines, scat, tracks) along watercourses. Currently there are no provincial standardized protocols that target river otter. Protocol used during surveys developed from methods used in previous BC studies, which generally consist of visual searches for river otters or their sign along shoreline transects (e.g., Engelstoft and Mogensen 2005; Crowley et al. 2012).

Breeding Bird Surveys

- Surveys to document songbird presence, relative abundance, distribution, and habitat use, conducted by qualified avian field biologists using the variable radius point-count method recommended in the provincial protocols (RIC 1999b). A subset of survey locations target olive-sided flycatcher habitat (i.e., edge habitats). Each point count is ten minutes in duration consisting of eight minutes of passive listening, followed by one minute of call playback for olive-sided flycatcher and a final minute of passive listening. The olive-sided flycatcher call playback consists of three repetitions of the song of an olive-sided flycatcher followed by one contact call note over the course of one minute.
- The surveys are conducted over two rounds during the breeding season (late May to early July). Survey stations selected in the first round are revisited in the second round.

American Goshawk (formerly Northern Goshawk) Surveys

- Call-playback surveys following standards outlined in Inventory Methods for Raptors (RIC 2001b), preceded by a high-level assessment of habitat suitability to identify locations of surveys in both foraging and nesting habitat, with sampling conducted in a variety of forested habitat types. Each transect surveyed twice during the breeding season, with survey rounds separated by at least five days.
- Call play-back stations located at 400 m intervals along each transect. Call-playbacks consist of 3 minutes of passive listening upon arrival, three rounds of call playback totalling 6 minutes, and a final 3 minutes of passive listening, totalling 12 minutes of survey. Calls are broadcast over a FoxPro call-playback device that is rotated 120 degrees after each call-series. To maximize the possibility of an American goshawk responding to the call-playback, the first round of surveys (June) broadcasts adult American goshawk territorial calls; the second round of surveys (July) broadcasts juvenile begging calls. Surveys broadcasting adult territorial calls are conducted during the breeding period, between sunrise and sunset. Surveys broadcasting juvenile begging calls are conducted in early morning, ‘peak hunger’ time for nesting females and chicks.
- If an American goshawk is observed, attempts are made to locate nests in the area (within a 300 m radius of the raptor’s initial detection location). Surveyors look for evidence of occupancy, including pellets and whitewash. If a nest is observed, information is collected including nest location, nest substrate, nest tree species, evidence of activity, and information noted for any American goshawk detected in or around the nest.

Winter Bird Surveys

- Surveys to determine the presence, species composition and distribution of birds overwintering in the area.
- Winter bird survey methodologies in temperate regions are lacking, and generally dependent on Citizen Science programs such as the Christmas Bird Count (BSC and Audubon 2020), and Project FeederWatch (Cornell and BSC 2021). Detailed targeted studies for winter birds in Canada are rare, and those methods that do exist are generally focused on raptors. The methodology applied to winter bird surveys conducted for the Project was developed from various government and Citizen Science protocols (RIC 2001b; CWS 2007; MNR 2011; BSC and Audubon 2020; HMANA 2021b).
- Surveys are timed to coincide with the overwintering period between spring and fall migration (December to March), with a focus on January and February when late fall and early spring migrants are unlikely to occur.

- Surveys are completed during daylight hours (between sunrise and sunset) under suitable weather conditions (winds less than 20 km/h, no or very light precipitation) to capture any overwintering birds that could be active at any time during this period.
- Two survey methodologies are employed, point counts in open habitats and transects in closed habitats. Point counts involve a 10-minute period of passive observation at a plot with unlimited radius. Transects are conducted by walking a maximum of 500 m through the predetermined survey area and stopping every several metres to account for species detection. For transects, survey duration is as long as needed to get an accurate count of birds within the target habitat. All birds observed by continuously scanning and listening within the survey duration are recorded.

Bird Migration Surveys

- Surveys to identify the bird species that pass through the area during spring and fall migration, to what extent, whether birds use the area for stopover and, if so, which habitats are used during stopover.
- A provincial (RISC) protocol specific to bird migration surveys is not available. In lieu, the following guidance documents or sources were considered in the development of the survey protocol:
  - Recommended Protocols for Monitoring Impacts of Wind Turbines on Birds (CWS 2007)
  - Bird Migration Survey Protocol (AEP 2020)
  - Resources Information Standards Committee Standards for raptors (RIC 2001b), waterfowl (RIC 1999d) and shorebirds (RIC 1997)
  - Hawk Migration Association of North America website (HMANA 2021a)
- Three survey methodologies are employed: migration point counts, stopover point counts and stopover transect counts. Migration point counts are conducted at stationary plots spaced at least 1,000 m apart to avoid double counting individuals. Survey duration consists of 20 minutes of passive observation within a 500 m radius circle around the plot centre. Survey duration for stopover counts (both point and transect) is as long as needed to get an accurate count of birds within the target habitat. Stopover point counts target open habitats (wetlands, meadows, forest clearings) and are generally completed within 10 to 15 minutes. Stopover transect counts target closed habitats (i.e., treed areas) and are maximum 500 m in length when measuring a direct line spatially; actual transect length varies based on habitat coverage and terrain.
- Three survey rounds are completed in each of the spring and fall seasons to capture the various species groups that are expected to pass through the region (e.g., raptors, waterfowl, passerines), since migration timing varies among groups and even among species within groups.

Amphibian Surveys

- Surveys conducted using two different methods:
  - i) time-constrained surveys; and
  - ii) environmental DNA analysis (referred to as eDNA).
- Surveys focused on suitable habitats within the Project footprint, but also target suitable habitats in the LSA.
- Time-constrained surveys preceded by a desktop evaluation for western toad breeding habitat followed by a field reconnaissance survey in May to verify desktop results and confirm survey locations. Surveys undertaken in June by a biologist with experience surveying for breeding amphibians (J. Hobbs) and generally aligned with provincial protocols (RIC 1998g). Survey effort varies depending on the size and suitability of the habitat but does not exceed 1 ha per surveyor hour. Although western toad is the target

species, all amphibian species observed are recorded. Additional information recorded includes species, location, development stage, count, aggregate (egg mass) size, water depth of observation, distance from shore to observation, average water depth, attachment substrate, bottom substrate, and macrohabitat (e.g., stream, log jam, shoreline). Global positioning system track files are recorded so that effort can be quantified and, if necessary, replicated in future years.

- Samples collected for eDNA interpretation at all sites where time-constrained surveys fail to detect any western toads. Additionally, eDNA collected at a subset of the sites where western toad is identified to act as a validation tool for the eDNA methods. eDNA methods follow standard protocols (Hobbs et al. 2017). eDNA methods are predicated on the fact that species exogenously shed their genetic material into their environment as they complete their life processes; this exogenous DNA may become suspended in aquatic ecosystems. For aquatic and semi-aquatic species, the presence of genetic material from the target taxa (i.e., western toad) from water samples collected on site allows inference regarding species' use of local (sampled) habitats. In aquatic habitats, suspended genetic material can be detected using quantitative polymerase chain reaction (qPCR) genetic analysis techniques; a positive result from qPCR analysis may indicate species presence.
- Three (i.e., triplicate) 1 L water samples collected at a single sample station. Samples processed in the same order as collected and filtration completed within 24 hours of collection. Following collection and filtration, eDNA samples preserved and sent to a genetics lab at the University of Victoria or Maxxam Analytics for qPCR analysis.

Gillette's Checkerspot Surveys

- Surveys conducted between July 1 and July 20, the predicted flight period for Gillette's checkerspot within the BC portion of the species' range, following methods used in past inventories for this species (Hobbs 2008; Dulc and Hobbs 2013). Surveys must be conducted under specific weather conditions (i.e., ≤ 25% cloud cover, wind < 2 on the Beaufort wind scale, and no precipitation) when the species is most active and detectable.
- Potentially suitable habitat areas (i.e., mesic sites with suitable vegetation species and structure) first identified in a GIS environment from high-resolution satellite imagery based on topography, elevation, vegetation, moisture, habitat patch size, and proximity to known extant populations. Survey locations focus on areas of potentially suitable habitat in the vicinity of the proposed Project footprint and the surrounding area. Consideration is afforded to dispersal capabilities of Gillette's checkerspot during identification and prioritization of survey areas.
- Surveys conducted by a biologist with extensive experience surveying for Gillette's checkerspot (J. Hobbs). At each survey location, visual searches conducted within areas of foraging habitat to determine the presence and abundance of Gillette's checkerspots and other butterflies. Surveys consist of visually scanning vegetation for flying, perched, and feeding butterflies. Individual butterflies may be captured using an aerial insect net, if confirmation of species identification is required. Any captured butterflies are immediately released after identification, and no specimens are collected.

Bumble Bee Surveys

- Surveys to determine the presence, species composition and distribution of bumble bees in the area.
- Survey methods are adapted from the Project Review Survey Protocol within the U.S. Fish and Wildlife Service Survey Protocols for the Rusty Patched Bumble Bee (USFWS 2019). The U.S. Fish and Wildlife

Service protocols are similar to the manual terrestrial arthropods collecting methods described in Government of British Columbia (1997); however, the U.S. Fish and Wildlife Service protocols provide additional methods to avoid bumble bee mortality.

- Surveys are timed to coincide with the flowering period to document foraging adult bumble bees (June-August) and are completed during daylight hours (earliest 2 hours after sunrise and latest 3 hours before sunset) under suitable weather conditions (winds less than 13 km/h, no precipitation, full sun or partial cloud cover, temperatures above 15°C).
- During each field visit, the flowering plants within each plot are surveyed for 30 or 60 minutes, depending on the level of bumble bee activity at the plot. The survey protocol consists of non-lethal techniques including netting and passive observation for bumble bees. Netting involves meandering through the plot, capturing bumble bees from flowers using a net then carefully transferring captured bees into a clear container for photographs. Passive observation includes photographing bees as they forage on flowers.
- Photographs of specimen are subsequently reviewed, and bumble bees are identified using classification keys.

Predisturbance Surveys

- Predisturbance surveys for wildlife species and important wildlife habitat features (e.g., nests, dens, mineral licks, wildlife trees) in support of exploration activities for the Project. Surveys focus on assessing and adjusting exploration activity locations (drill holes, test pits, access trails, etc.) to avoid and minimize impacts on wildlife species at risk and sensitive wildlife features.
- Surveys consider the wildlife habitat features identified under Government Actions Regulation Ministerial Order No. M 213 for the Kootenay Boundary Region, as well as nests of migratory birds protected under Schedule 1 of the Migratory Birds Regulations, 2022.
- Surveys undertaken by meandering through the focus area searching for wildlife and wildlife sign.
- Each observation record includes, at minimum, the location of the observation, species or species group, photo, and observation notes (e.g., description of habitat feature such as measurement of den entrance).

E2.11 Human and Terrestrial Wildlife Health

- Soil and vegetation sample collection to determine existing metals and polycyclic aromatic hydrocarbon concentrations. Vegetation tissue samples were co-located with soil samples.
- The soil and vegetation baseline sampling program was developed in general accordance with:
  - British Columbia Field Sampling Manual (BC ENV 2013)
  - First Nations Food, Nutrition & Environment Study (FNFNES; Chan et al. 2011)
  - Supplemental Guidance on Human Health Risk Assessment for Country Foods (Health Canada 2010)
  - Existing local studies (Firelight Group 2015, Ramboll Environ 2016)
- The guidance documents were used to develop study objectives, sampling procedures, and quality assurance/ quality control (QA/QC) protocols for the sampling of soil and vegetation tissue. Sampling locations were selected to provide good coverage across the local study area with preference given to locations near recreation sites, hiking trails, trapper cabins, parks and other likely frequented areas by people and wildlife.

- The majority of the soil and vegetation tissue was conducted by Golder in August 2019 and some additional samples were collected in August 2020 to address new receptor locations provided by the Ktunaxa.
- The baseline soil and vegetation data will be used in the human and wildlife health risk assessment for the following purposes:
    - Determine the baseline concentrations that people and wildlife that consume plants and incidentally ingest soil may be exposed to.
    - Predict future concentrations of constituents in soil and vegetation as a result of the deposition of air emissions from the Project.
    - Calculate site-specific bioaccumulation factors (to determine uptake relationships between concentrations of constituents in soil and vegetation).

E2.12 Socio-Economic, Land and Water Resources Use, and Visual Aesthetics

Socio-Economic Primary Data Collection

- The socio-economic baseline will profile the existing social conditions in the Elk Valley and Crowsnest Pass through secondary and primary data collection programs related to the Employment and Economy, Services and Infrastructure, and Human Health and Wellbeing components VCs. Secondary social and economic data has recently been collected for the Elk Valley Social Baseline and Impact Assessment (Golder Associates Ltd. 2017) and updated to reflect more recent publicly available data. Primary data collection will be undertaken through a targeted interview program with local elected representatives, local and regional government staff members and managers, and representatives of local community organizations to supplement secondary data collection.
- The interviews with local and regional government staff members and managers and representatives of local organizations would be targeted, one-on-one interviews. Specific questions will be developed for each interview to address gaps in baseline data and gather information about potential Project effects. In advance of interviews, interviewees will be provided with an interview guide outlining general topics to be covered, specific questions that will be asked to fill gaps, and any data requirements or reports that would be of use if prepared prior to the interview. WSP will identify community contacts through EVR's relationships and supplement with additional representatives from organizations, as appropriate.
- It will be important to recognize that baseline conditions and experiences differ between subgroups of society, and a Gender Based Analysis Plus (GBA+) approach will be applied in the selection of interviewees and topics.
- Key socio-economic issues related to development of the Project are anticipated to include:
    - Employment and contracting opportunities due to the additional construction opportunities and continuation of mining operations.
    - Population change as a result of new employment opportunities created through the Project and temporary or permanent in-migration of workers and their families.
    - Demand for housing and community services and community infrastructure due to potential in-migration of workers and their families, and effects on housing supply and availability and quality of services and infrastructure.

  - Benefits to the local and regional economy as a result of direct and indirect employment and procurement in the local economy, including the development of the mining sector, employment, income, business opportunities and government revenue generation through payment of taxes, including the benefits through the Elk Valley Property Tax Sharing Agreement.
  - Nuisance from Project related to sensory disturbance (e.g., dust, noise, visual affects).
  - Differing experiences of the Project, both through positive and adverse effects, based on unique characteristics and circumstances of subgroups of the population.
- The scope of the socio-economic baselines does not include baseline information on Indigenous groups. EVR will work with the KNC to develop the work plan for the assessment of Indigenous interests. This may include content pertaining to the social and economic conditions of Ktunaxa Nation communities and citizens, including, where appropriate, avenues for integrating information into the IS/A. Other Indigenous communities identified by IAAC will be included in a similar process, as required.

Land and Water Resources Use Secondary Data Collection

- A preliminary Land and Resource Use land and resource secondary data collection program detailing existing conditions pertaining to land use planning and ownership, commercial and non-commercial land and resource use within the land and resource use local and regional study areas. This included review of data collected for the Elk Valley Social Baseline and Impact Assessment (Golder Associates Ltd. 2017) and updated from available data sources such as:
  - local, regional and provincial land and resource planning documents, relevant statutes, policies and frameworks
  - tenure, ownership and land use designation information
  - mapping of commercial and recreational use activity and areas data
  - wildlife and fish harvesting statistics, and regulations
  - information from EVR (e.g., access agreements)

Land and water Resource Use Primary Data Collection

- A land and resource use primary data collection program will be undertaken through a series of interviews and group mapping sessions with local resource operators (forestry, mining, gas), trappers and guide outfitters, wildlife conservation officer and groups, and recreational user groups. The primary data program will verify the accuracy of secondary land and resource use information and provide an understanding of the pattern of area use and access, and the relative level of use and timing of commercial and recreational activities (e.g., fishing, hunting, ATVing) occurring with in the study areas.
- Secondary and primary data collection involves the identification of distinct land and resource use sub-groups and their characterizing their baseline conditions and experiences using a GBA+.

Visual Aesthetics photographic survey

- A photographic field survey was conducted between August 25 to 28, 2020 to capture landscape photographs and observational information from surveyed viewpoint locations with a view of the Project area. Preliminary viewing locations were determined through the results of visibility modelling, from mapping of roadways and recreations areas, and from receptor sites provided by the KNC that represent sensitive locations within a known use area. During the field survey, preliminary viewing locations were adjusted

based on observations to produce representative views towards the Project that may be experienced by viewers where the Project is most visible.

Visual Aesthetics baseline landscape modelling

- Three of the viewpoints identified related to Ktunaxa indigenous cultural use areas were not accessible for photos during the photographic survey either because they are within existing No Authorized Entry areas for GHO and FRO mine sites, or are located in area that were not safe for access (i.e., alpine areas). In order to address this gap, landscape modelling and simulations of the existing viewing conditions will be developed to include in visual aesthetics baseline reporting. The modelling will be based on terrain and vegetation data, and orthographic imagery, and developed in advance landscape modelling software to produce a photo-realistic simulations of the views towards the project that may be experienced from these locations.

Visual Aesthetics lighting study

- A light baseline monitoring program was carried out in April and August, 2021 to establish current wintertime and summertime lighting conditions based on guidance from the Commission Internationale de L'Éclairage (CIE 2017) at locations consistent with the Visual Aesthetics photographic survey, where possible.

E2.13 Geochemistry

- Laboratory analysis of samples collected from RC and core holes in the Project area.

E2.14 Archaeology

Archaeological overview assessments, impact assessments, and data analyses are conducted in general accordance with the following:

- The British Columbia Archaeological Impact Assessment Guidelines (BC Archaeology Branch 1998).
- The British Columbia Archaeology Branch Archaeological Site Form Requirements V.7 (BC Archaeology Branch 2021).
- The British Columbia Archaeology Branch Mapping and Spatial Requirements V4. (BC Archaeology branch 2021).
- The British Columbia Archaeology Branch Guidelines for Defining Archaeological Site Boundaries and Protection Status (BC Archaeology Branch 2017).

E3.0 References

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Appendix F: List of Scientific Names

Table F-1: List of Scientific Names

Common Name	Scientific Name
abbreviated bluegrass	*Poa abbreviate* ssp. *pattersonii*
American badger	*Taxidea taxus jeffersonii*
American dipper	*Cinclus mexicanus*
American goshawk[(a)]	*Accipiter atricapillus*
American robin	*Turdus migratorius*
Arizona calcareous moss	*Mnium arizonicum*
bank swallow	*Riparia riparia*
Barbula amplexifolia	*Barbula amplexifolia*
barn swallow	*Hirundo rustica*
beaver	*Castor canadensis*
Bebb's willow	*Salix bebbiana*
bent-flowered milk-vetch	*Astragalus vexilliflexus* var. *vexilliflexus*
bighorn sheep	*Ovis canadensis*
black alpine sedge	*Carex nigricans*
black bear	*U. americanus*
black cottonwood	*Populus trichocarpa*
black huckleberry	*Vaccinium membranaceum*
blue-footed pixie	*Cladonia cyanipes*
bluebunch wheatgrass	*Pseudoroegneria spicata*
bluejoint reedgrass	*Calamagrostis canadensis*
bronze copper	*Lycaena hyllus*
buff daisy	*Erigeron ochroleucus*
cephaloziella liverwort	*Cephaloziella rubella*
clad lichens	*Cladonia* spp.
Clark's nutcracker	*Nucifraga columbiana*
Columbia spotted frog	*Rana luteiventris*
Columbian ground squirrel	*Urocitellus columbianus*
common hook moss	*Drepanocladus aduncus*
common juniper	*Juniperus communis*
common nighthawk	*Chordeiles minor*
common red paintbrush	*Castilleja miniata*
common snowberry	*Symphoricarpos albus*
compact selaginella	*Selaginella densa*
Connecticut warbler	*Oporornis agilis*
coyote	*Canis latrans*
Decurrent sheep cinquefoil	*Potentilla ovina* var. *decurrens*
desmatodon moss	*Tortula leucostoma*
diverse-leaved cinquefoil	*Potentilla diversifolia*
Donn's grimmia	*Grimmia donniana*
Douglas-fir	*Pseudotsuga menziesii*
Drummond's willow	*Salix drummondiana*

Table F-1: List of Scientific Names

Common Name	Scientific Name
dusky grouse	*Dendragapus obscurus*
eastern red bat	*Lasiurus borealis*
elk	*Cervus canadensis*
Engelmann spruce	*Picea engelmannii*
Engelmann's knotweed	*Polygonum engelmannii*
false azalea	*Menziesia ferruginea*
falsebox	*Paxistima myrsinites*
Fernald's cuckoo bumble bee	*Bombus flavidus*
Flathead larkspur	*Delphinium bicolor*
forest brownwort	*Tritomaria exsectiformis* ssp. *exsectiformis*
fox sparrow	*Passerella iliaca*
Gillette's checkerspot	*Euphydryas gillettii*
great blue heron	*Ardea herodias herodias*
green false-hellebore	*Veratrum viride*
grizzly bear	*Ursus arctos*
grouseberry	*Vaccinium scoparium*
hard-stemmed bulrush Deep Marsh	*Schoenoplectus acutus* Deep Marsh
harlequin duck	*Histrionicus histrionicus*
heart-leaved arnica	*Arnica cordifolia*
hoary bat	*Lasiurus cinereus*
Homosekikaic pixie-cup	*Cladonia homosekikaica*
horsetail	*Equisetum* spp.
hybrid Engelmann × white spruce	*Picea glauca* × *engelmannii*
Hygroamblystegium varium	*Hygroamblystegium varium*
Idaho fescue	*Festuca idahoensis*
junegrass	*Koeleria macrantha*
killdeer	*Charadrius vociferus*
leafy moss	*Mnium* sp.
lescuraea moss	*Lescuraea saxicola*
limber pine	*Pinus flexilis*
little brown myotis	*Myotis lucifugus*
lodgepole pine	*Pinus contorta*
long-billed curlew	*Numenius americanus*
long-toed salamander	*Ambystoma macrodactylum.*
low bilberry	*Vaccinium myrtillus*
lynx	*Lynx canadensis*
marten	*Martes americana*
mink	*Neovison vison*
moose	*Alces americanus*
mountain alder	*Alnus incana*
mountain goat	*Oreamnos americanus*

Table F-1: List of Scientific Names

Common Name	Scientific Name
mule deer	*Odocoileus hemionus*
olive-sided flycatcher	*Contopus cooperi*
one-leaved foamflower	*Tiarella trifoliate var. unifoliata*
Orthotrichum pallens	*Orthotrichum pallens*
pale bristle-moss	*Orthotrichum pallens*
Parry's townsendia	*Townsendia parryi*
pine siskin	*Spinus pinus*
pinegrass	*Calamagrostis rubescens*
prairie falcon	*Falco mexicanus*
red squirrel	*Tamiasciurus hudsonicus*
red-necked phalarope	*Phalaropus lobatus*
red-osier dogwood	*Cornus sericea*
red-stemmed feather moss	*Pleurozium schreberi*
red-tailed hawk	*Buteo jamaicensis*
rock rather moss	*Lescuraea saxicola*
Rocky Mountain willowherb	*Epilobium saximontanum*
rose	*Rosa* spp.
rough fescue	*Festuca campestris*
rough-legged hawk	*Buteo lagopus*
rufous hummingbird	*Selasphorus rufus*
Saskatoon	*Amelanchier alnifolia*
Scheuchzer's cotton grass Herbaceous Vegetation	*Eriophorum scheuchzeria* Herbaceous Vegetation
Schleicher's thread-moss	*Ptychostomum schleicheri*
scrub birch	*Betula nana*
sheep cinquefoil	*Potentilla oviana* var. *ovina*
short-tooth hump-moss	*Amblyodon dealbatus*
silver-haired bat	*Lasionycteris noctivagans*
slender sedge	*Carex lasiocarpa*
slender smoothcap	*Atrichum tenellum*
snowshoe hare	*Lepus americanus*
soopalallie	*Shepherdia canadensis*
spathulate candle snuffer moss	*Encalypta spathulata*
spotted sandpiper	*Actitis macularius*
step moss	*Hylocomium splendins*
subalpine daisy	*Erigeron peregrinus*
subalpine fir	*Abies lasiocarpa*
sulphur buckwheat	*Eriogonum umbellatum*
sweet-flowered fairy-candelabra	*Androsace chamaejasme* ssp. *lehmanniana*
Sitka valerian	*Valeriana sitchensis*
subalpine larch	*Larix lyallii*
thread-leaved sandwort	*Eremogone capillaris*

Table F-1: List of Scientific Names

Common Name	Scientific Name
three-toed woodpecker	*Picoides dorsalis*
timber oatgrass	*Danthonia intermedia*
tri-tip leafy liverwort	*Lophozia silvicola*
twinflower	*Linnaea borealis*
two-toned bone lichen	*Hypogymnia dichroma*
Utah honeysuckle	*Lonicera utahensis*
water sedge	*Carex aquatilis*
weasel	*Mustela sp.*
western bumble bee	*Bombus occidentalis*
western larch	*Larix occidentalis*
western meadow rue	*Thalictrum occidentale*
western pasqueflower	*Anemone occidentalis*
western toad	*Anaxyrus boreas*
Westslope Cutthroat Trout	*Oncorhynchus clarkii lewisi*
whitebark pine	*Pinus albicaulis*
wolf	*Canis lupus*
Wolf's trisetum	*Graphephorum wolfii*
wood frog	*Lithobates sylvaticus*
Wyoming kitten-tails	*Synthyris wyomingensis*
yarrow	*Achillea borealis*
yellow beard-tongue	*Penstemon confertus*

(a) Formerly northern goshawk (*Accipiter gentilis atricapillus*).

Appendix G: Plant Species and Ecological Communities at Risk with Potential to Occur in the Project Vicinity

G1.0 Introduction

The tables below were developed from a search of the British Columbia Conservation Data Centre, first accessed in January 2020 and July 2021, and confirmed against status updates current to March 2025, and previously collected data. The tables are intended to provide initial information regarding listed species and ecological communities with the potential to occur in the Project vicinity for early engagement. These lists are not intended to be comprehensive; searches will be re-run and species and ecological communities will be updated in concert with baseline data collected in the field, as well as through collaboration and engagement with stakeholders and regulators, as the project progresses (for example, for valued component selection and environmental assessment).

Table G-1: Listed Plants with Potential to Occur in the Project Vicinity

Scientific Name	Common Name	Provincial/ Global Status[a]	BC List[b]	COSEWIC[c]	SARA[d]
Vascular Plants					
Androsace chamaejasme ssp. *lehmanniana*	sweet-flowered fairy-candelabra	S2S3/G5T5	Blue	-	-
Arnica longifolia	Seep-spring arnica	S3/G5	Blue	-	-
Astragalus crassicarpus var. paysonii	ground plum milk-vetch	S1/G5TNR	Red	-	-
Astragalus drummondii	Drummond's milk-vetch	S1/G5	Red	-	-
Brickellia grandiflora	large-flowered brickellia	S1/G5	Red	NAR	-
Carex paysonis	Payson's sedge	SH/G4G5	Red	-	-
Cirsium scariosum var. *scariosum*	elk thistle	S3/G5T5?	Blue	E	-
Claytonia megarhiza[e]	alpine springbeauty	S3/G5	Blue	-	-
Crepis acuminata ssp. *acuminata*	long-leaved hawksbeard	S1/G5T4T5	Red	-	-
Delphinium bicolor ssp. *bicolor*	Flathead larkspur	S3/G4G5T4T5	Blue	-	-
Epilobium saximontanum	Rocky Mountain willowherb	S2/G5	Red	-	-
Erigeron lackschewitzii	Lackschewitz's fleabane	S2/G3	Red	-	-
Erigeron ochroleucus	Buff daisy	S2S3/G5	Blue	-	-
Erigeron radicatus	Taproot fleabane	S1/G3G4	Red	-	-
Eriogonum androsaceum	androsace buckwheat	S2/G4	Red	-	-
Gentiana calycosa	mountain bog gentian	S2S3/G4	Blue	-	-
Graphephorum wolfii	Wolf's trisetum	S3	Blue	-	-
Lupinus sulphureus	sulphur lupine	SU?/G5TNR	Unknown	-	-
Nabalus sagittata	arrow-leaved rattlesnake-root	S1/ G4	Red	-	-
Oenothera suffrutescens	scarlet gaura	S3/G5	Blue	-	-
Papaver pygmaeum	dwarf poppy	S2?/G3	Red	-	-
Penstemon nitidus var. *nitidus*	shining penstemon	S2?/G5T5	Red	-	-
Phacelia lyallii	Lyall's phacelia	S2/G3G4	Red	-	-
Pinus albicaulis	whitebark pine	S2S3/G3G4	Blue	E	1-E
Pinus flexilis	limber pine	S2S3/G4	Red	E	-
Plantago canescens	arctic plantain	S2/G4G5	Red	-	-

Table G-1: Listed Plants with Potential to Occur in the Project Vicinity

Scientific Name	Common Name	Provincial/ Global Status[a]	BC List[b]	COSEWIC[c]	SARA[d]
Poa abbreviate ssp. *pattersonii*[e]	abbreviated bluegrass	S2S3/G5T5	Blue	-	-
Polemonium elegans	elegant Jacob's-ladder	S2/G4	Red	-	-
Polygonum austiniae	Austin's knotweed	S2/G5T4	Red	-	-
Polygonum engelmannii	Engelmann's knotweed	S1/G5T3T5	Red	-	-
Potentilla ovina var. *ovina*	sheep cinquefoil	S2?/G5?T5?	Red	-	-
Senecio hydrophiloides	sweet-marsh butterweed	S3/G5	Blue	-	-
Senecio megacephalus	large-headed groundsel	S3/G4	Blue	-	-
Silene hitchguirei	mountain catchfly	S1S3	Red	-	-
Symphyotrichum frondosum[e]	short-rayed aster	S2	Red	E	1-E
Synthyris wyomingensis	Wyoming kitten-tails	S2/G5	Red	-	-
Thalictrum dasycarpum	purple meadowrue	S3/G5	Blue	-	-
Townsendia parryi	Parry's townsendia	S3/G5	Blue	-	-
Non-vascular Plants					
Amblyodon dealbatus	Short-tooth hump-moss	S3	Blue	-	-
Atrichum tenellum	Slender smoothcap	S3?/G4G5	Blue	-	-
Barbula amplexifolia	Barbula moss	S2S3/GNR	Blue	-	-
Bryobrittonia longipes	Not available	S3S4/G3G4	Yellow	-	-
Bryum uliginosum	Not available	S2S3/G3G5	Blue	-	-
Cephaloziella rubella	Cephaloziella liverwort	S3/GNR	Blue	-	-
Didymodon subandreaeoides	Not available	S4/G4G5	Yellow	-	-
Encalypta spathulata	spathulate candle snuffer moss	S3S4/G4	Yellow	-	-
Grimmia donniana	Donn’s grimmia	S3S4/G4G5	Yellow	-	-
Grimmia unicolor	grimmia moss	S2S3/G5	Blue	-	-
Hygroamblystegium noterophilum	Not available	S2S4/G5T4	Blue	-	-
Hygroamblystegium varium[e]	Not available	S4/G5TNR	Yellow	-	-
Hygrohypnum alpinum	Not available	S3/G4G5	Blue	-	-
Lescuraea saxicola	Rock rather moss	S4/G4G5	Yellow	-	-
Lophozia silvicola	Trip-tip leafy liverwort	S2S4/G4	Yellow	-	-
Mnium arizonicum	Arizona calcareous moss	S3S4/G5?	Yellow	-	-
Orthotrichum pallens	Orthotrichum pallens	S3S4/G5TNR	Yellow	-	-
Physcomitrium pyriforme	Not available	S4/G5	Yellow	-	-
Pohlia longicollis	Not available	S2/G4G5	Red	-	-
Pseudoleskea incurvate var. *gigantea*	Not available	S3/G5TNR	Blue	-	-
Ptychostomum schleicheri	Schleicher's thread-moss	S4/G5?	Yellow	-	-
Racomitrium pygmaeum	Not available	S2/Gu	Blue	-	-
Schistidium atrichum	Not available	S4/GNR	Yellow	-	-
Schistidium robustum	Not available	S3/GNR	Blue	-	-
Tortula leucostoma[e]	desmatodon moss	S3?/G5	Blue		
Tritomaria exsectiformis subsp. *exsectiformis*	forest brownwort	S3	Blue	-	-

Table G-1: Listed Plants with Potential to Occur in the Project Vicinity

Scientific Name	Common Name	Provincial/ Global Status[a]	BC List[b]	COSEWIC[c]	SARA[d]
Warnstorfia pseudostraminea	Not available	SU/G3G4	Unknown	-	-
Lichen					
Cladonia cyanipes[e]	Blue-footed pixie	S2S4/G5	Blue	-	-
Hypogymnia dichroma	Two-toned bone lichen	S3?/GNR	Blue	-	-

(a) S = Provincial; G = Global; T = Species Variety Ranking; 1 = Critically Imperilled; 2 = Imperilled; 3 = Vulnerable; 4 = Apparently Secure; 5 = Secure; ? = Not Certain; H = Historical (possibly extirpated); NR = Not Ranked; U = Unrankable.

(b) Red = Extirpated, Endangered, or Threatened; Blue = Special Concern.

(c) COSEWIC (Committee on the Status of Endangered Wildlife in Canada); - = not listed; E = Endangered; NAR = Not at Risk (Government of Canada 2020).

(d) SARA (*Species at Risk Act*); - = not listed; 1-E = Endangered species listed on Schedule 1 (Government of Canada 2021).

(e) Augmented with observations of plant species at risk obtained from Teck's historical dataset and previous reports.

Source: BC CDC 2025. Search criteria (March 2025): Forest District = Rocky Mountain Forest District AND BGC Zone = IMA, ESSFdk, MSdw, and MSdk. Search restricted to Red, Blue, and legally designated species.

Table G-2: Listed Ecological Communities with Potential to Occur in the Project Vicinity

English Name	Scientific Name	Biogeoclimatic Unit/ Site Series	Provincial/ Global Status[a]	BC List[b]
Brushland and Grassland				
Rough fescue (bluebunch wheatgrass) - Yarrow – clad lichens	*Festuca campestris (Psudoroegneria spicata) - Achillea borealis – Cladonia spp.*	MSdk1/Gg12, MSdw/Gg12	S1S2/GNR	Red
Idaho fescue - sulphur buckwheat - sandwort	*Festuca idahoensis - Eriogonum umbellatum - Eremogone capillaris*	ESSFdk1/Gg14, ESSFdkp/Gg14, ESSFdkw/Gg14	S2/GNR	Red
Rough fescue - sulphur buckwheat - sandwort	*Festuca campestris - Eriogonum umbellatum - Eremogone capillaris*	ESSFdk1/Gg16/, ESSFdk1/Vh12, ESSFdk2/Gg16, ESSFdkp/gg16, ESSFdkw/Gg16, ESSFdkw/Vh12	S1S2/GNR	Red
Idaho fescue - bluebunch wheatgrass - sulphur buckwheat	*Festuca idahoensis - Pseudoroegneria spicata - Eriogonum umbellatum*	ESSFdk1/Gg17, ESSFdkw/Gg17, MSdw/Gg17	S1S2/GNR	Blue
Saskatoon - soopolallie - common juniper	*Amelanchier alnifolia - Shepherdia canadensis - Juniperus communis*	ESSFdk1/Gb20, ESSFdk2/Gb20, ESSFdkw/Gb20, MSdk/Gb20, MSdk1/Gb20	S3?/GNR	Blue
mallow ninebark - oceanspray - bluebunch wheatgrass	*Physocarpus malvaceus - Holodiscus discolor - Pseudoroegneria spicata*	MSdw/Gb03	S2?/GNR	Red
Riparian Flood				
Mountain alder / common horsetail	*Alnus incana / Equisetum arvense*	MSdk/Fl01, MSdw/Fl01	S3/G3	Blue
Mountain alder/ red-osier dogwood / lady fern	*Alnus incana / Cornus sericea / Athyrium filix-femina*	MSdk/Fl02, MSdw/Fl02	S3/G3G4	Blue

Table G-2: Listed Ecological Communities with Potential to Occur in the Project Vicinity

English Name	Scientific Name	Biogeoclimatic Unit/ Site Series	Provincial/ Global Status[a]	BC List[b]
Drummond's willow / bluejoint reedgrass	*Salix drummondiana / Calamagrostis canadensis*	ESSFdk1/Fl05, ESSFdk2/Fl05, MSdk/Fl05, MSdk1/Fl05, MSdk2/Fl05, MSdw/Fl05	S2S3/G3	Blue
narrow-leaf willow shrubland	*Salix exigua* shrubland	Msdw/Fl06	S2/G5	Red
black cottonwood / common snowberry – roses	*Populus trichocarpa / Symphoricarpos albus - Rosa spp.*	MSdk/Fm01, MSdk1/Fm01, MSdw/Fm01	S1/GNR	Red
black cottonwood - hybrid white spruce / red-osier dogwood	*Populus trichocarpa - Picea engelmannii x glauca / Cornus sericea*	MSdk/Fm02, MSdw/Fm02	S3/GNR	Blue
Wetlands				
scrub birch / water sedge	*Betula nana / Carex aquatilis*	Wf02	S3S4/G4	Yellow
slender sedge / common hook-moss	*Carex lasiocarpa / Drepanocladus aduncus*	MSdk1/Wf05, MSdk2/Wf05, MSdw/Wf05	S3/G3	Blue
buckbean - slender sedge	*Menyanthes trifoliata - Carex lasiocarpa*	MSdk/Wf06, MSdw/Wf06	S3/G3	Blue
shore sedge - buckbean / hook-mosses	*Carex limosa - Menyanthes trifoliata / Drepanocladus* spp.	MSdk/Wf08	S3/G3	Blue
narrow-leaved cotton-grass - shore sedge	*Eriophorum angustifolium - Carex limosa*	ESSFdk1/Wf13, ESSFdk2/Wf13, ESSFdkw/Wf13	S3/G3	Blue
swamp horsetail - beaked sedge	*Equisetum fluviatile - Carex utriculata*	MSdk/Wm02, MSdw/Wm02	S3/G4	Blue
common spike-rush Herbaceous Vegetation	*Eleocharis palustris Herbaceous Vegetation*	MSdk/Wm04, MSdw/Wm04	S3/GNR	Blue
common cattail Marsh	*Typha latifolia Marsh*	MSdk/Wm05	S3/G5	Blue
hard-stemmed bulrush Deep Marsh	*Schoenoplectus acutus* Deep Marsh	MSdk/Wm06, MSdk1/Wm06, MSdk2/Wm06, MSdw/Wm06	S3/G5	Blue
tufted clubrush / golden star-moss	*Trichophorum cespitosum / Campylium stellatum*	ESSFdk1/Wf11, ESSFdk2/Wf11, MSdk/Wf11, MSdw/Wf11	S2S3/G2G3	Blue
Sitka willow / Sitka sedge	*Salix sitchensis / Carex sitchensis*	MSdk/Ws06, MSdw/Ws06	S3/G3	Blue
Bebb's willow / bluejoint reedgrass	*Salix bebbiana / Calamagrostis canadensis*	ESSFdk2/Ws03, MSdk/Ws03, MSdw/Ws03	S3/G3	Blue
hybrid white spruce / horsetails / leafy mosses	*Picea engelmannii x glauca / Equisetum spp. / Mnium spp.*	Msdk/111b, MSdk/Ws07, MSdw/111b, MSdw/Ws07	S3/GNR	Blue

Table G-2: Listed Ecological Communities with Potential to Occur in the Project Vicinity

English Name	Scientific Name	Biogeoclimatic Unit/ Site Series	Provincial/ Global Status[a]	BC List[b]
Alpine				
timber oatgrass – grouseberry – thread-leaved sandwort – compact selaginella	*Danthonia intermedia – Vaccinium scoparium – Eremogone capillaris – Selaginella densa*	ESSFdk1/Ag01, ESSFdkp/Ag01, ESSFdkw/Ag01, IMAun/Ag01	S2? /GNR	Red

(a) S = Provincial; G = Global; T = Species Variety Ranking; 1 = Critically Imperilled; 2 = Imperilled; 3 = Vulnerable; 4 = Apparently Secure; 5 = Secure; ? = Not Certain; H = Historical (possibly extirpated); NR = Not Ranked; U = Unrankable.

(b) Red = Extirpated, Endangered, or Threatened; Blue = Special Concern.

Source: BC CDC 2024. Search criteria (December 13, 2024): BGC Zone = IMAun, ESSFdk1, ESSFdk2, ESSFdk, ESSFdkp, ESSFdkw, MSdk, MSdk1, MSdk2, MSdw. Search restricted to Red and Blue listed ecological communities. Augmented with observations of ecological communities at risk obtained from Teck's previous projects.

G2.0 References

BC CDC (British Columbia Conservation Data Centre). 2025. BC Species and Ecosystems Explorer. Accessed March 2025. Available at: http://a100.gov.bc.ca/pub/eswp/.

Government of Canada. 2021. Species at Risk Public Registry. https://wildlife-species.canada.ca/species-risk-registry/sar/index/default_e.cfm. [accessed July 2021].

Appendix H: Wildlife Species at Risk with Potential to Occur in the Project Vicinity

H1.0 Introduction

The table below was developed primarily from a search of the British Columbia Conservation Data Centre, accessed in March 2025, as well as some previously collected data and external sources (e.g., British Columbia Breeding Bird Atlas). The table is intended to provide initial information regarding listed wildlife and fish species with the potential to occur in the Project vicinity for early engagement. The list of potentially occurring species generated from available data is inclusive and precautionary, and some of the species identified are expected to have a low probability of occurring. There is also a chance that some species at risk that could occur near the Project may be missing from this list; searches will be re-run and species will be updated in concert with baseline data collected in the field, as well as through collaboration and engagement with stakeholders and regulators, as the project progresses (for example, for valued component selection and environmental assessment).

Table H-1: Wildlife and Fish Species at Risk with Potential to Occur in the Project Vicinity

Common Name	Scientific Name	Provincial/ Global Status[a]	BC List[b]	COSEWIC[c]	SARA[d]
Mammals					
American Badger, jeffersonii subspecies	*Taxidea taxus jeffersonii*	S2/G5	Red	E	1-E
Bighorn Sheep	*Ovis canadensis*	S3?/G4	Blue	-	-
Eastern Red Bat	*Lasiurus borealis*	SU	Unknown	E	-
Fisher, Columbian population	*Pekania pennant pop. 5*	S2/G5TNR	Red	-	-
Grizzly Bear	*Ursus arctos*	S3?/G4	Blue	SC	1-SC
Hoary Bat	*Lasiurus cinereus*	S3S4/G3G4	Blue	E	-
Least Chipmunk, oreocetes subspecies	*Neotamias minimus oreocetes*	S3/G5T3	Blue	-	-
Least Chipmunk, selkirki subspecies	*Neotamias minimus selkirki*	S1/G5T1	Red	-	-
Little Brown Myotis	*Myotis lucifugus*	S4/G3	Yellow	E	1-E
Mountain Goat	*Oreamnos americanus*	S3/G5	Blue	-	-
Northern Myotis	*Myotis septentrionalis*	S3S4/G1G2	Blue	E	1-E
Red-tailed Chipmunk, ruficaudus subspecies	*Neotamias ruficaudus ruficaudus*	S2/G4G5T4	Red	-	-
Silver-haired Bat	*Lasionycteris noctivagans*	S4S5	Yellow	E	-
Southern Red-backed Vole, galei subspecies	*Myodes gapperi galei*	S3S4/G5T5	Blue	-	-
Townsend's Big-eared Bat	*Corynorhinus townsendii*	S3S4/G4	Blue	-	-
Wolverine, luscus subspecies	*Gulo gulo luscus*	S3/G4T4	Blue	SC	1-SC
Yuma Myotis	*Myotis yumanensis*	S3/G5	Blue	-	-
Birds					
American Avocet	*Recurvirostra americana*	S2S3B/G5	Blue	-	-
American Bittern	*Botaurus lentiginosus*	S3B, SNRN/G5	Blue	-	-
American Goshawk[e]	*Accipiter atricapillus*	S3S4/G5T5	Blue	NAR	-
Bank Swallow	*Riparia riparia*	S4B/G5	Yellow	T	1-T
Barn Swallow	*Hirundo rustica*	S3S4B/G5	Blue	SC	1-T
Black Swift	*Cypseloides niger*	S2S3B/G4	Blue	E	1-E

Table H-1: Wildlife and Fish Species at Risk with Potential to Occur in the Project Vicinity

Common Name	Scientific Name	Provincial/ Global Status[a]	BC List[b]	COSEWIC[c]	SARA[d]
Broad-winged Hawk	*Buteo platypterus*	S3?B/G5	Blue	-	-
Common Nighthawk	*Chordeiles minor*	S4B/G5	Yellow	SC	1-T
Connecticut Warbler	*Oporornis agilis*	S3B/G4G5	Blue	-	-
Eared Grebe	*Podiceps nigricollis*	S3B/G5	Blue	-	-
Evening Grosbeak	*Coccothraustes vespertinus*	S5/G5	Yellow	SC	1-SC
Flammulated Owl	*Psiloscops flammeolus*	S3B/G4	Blue	SC	1-SC
Great Blue Heron, herodias subspecies	*Ardea herodias herodias*	S3?/G5T5	Blue	-	-
Gyrfalcon	*Falco rusticolus*	S3S4B,SNRN/G5	Blue	NAR	-
Killdeer	*Charadrius vociferus*	S3S5B/G5	Blue	-	-
Lewis's Woodpecker	*Melanerpes lewis*	S2S3/G2G3	Blue	T	1-T
Long-billed Curlew	*Numenius americanus*	S3B/G5	Blue	SC	1-SC
Olive-sided Flycatcher	*Contopus cooperi*	S4B/G4	Yellow	SC	1-SC
Peregrine Falcon, anatum subspecies	*Falco peregrinus anatum*	S2?/G4T4	Red	NAR	1-SC
Prairie Falcon	*Falco mexicanus*	S1/G5	Red	NAR	-
Red-necked Phalarope	*Phalaropus lobatus*	S3S4B/G4G5	Blue	SC	1-SC
Rough-legged Hawk	*Buteo lagopus*	S3N/G5	Blue	NAR	-
Rusty Blackbird	*Euphagus carolinus*	S3S4B/G4	Blue	SC	1-SC
Short-eared Owl	*Asio flammeus*	S3B,S2N/G5	Blue	T	1-SC
Swainson's Hawk	*Buteo swainsoni*	S2B/G5	Red	-	-
Western Screech-owl, macfarlanei subspecies	*Megascops kennicottii macfarlanei*	S3/G4G5T4	Blue	T	1-T
Williamson's Sapsucker	*Sphyrapicus thyroideus*	S3B/G5	Blue	E	1-E
Amphibians					
Coeur d'Alene Salamander	*Plethodon idahoensis*	S3?/G4	Blue	SC	1-SC
Northen Leopard Frog	*Lithobates pipiens*	S1/G5	Red	E	1-E
Rocky Mountain Tailed Frog	*Ascaphus montanus*	S2S3/G4	Blue	T	1-T
Western Toad	*Anaxyrus boreas*	S4/G4	Yellow	SC	1-SC
Reptiles					
Northern Rubber Boa	*Charina bottae*	S4/G5	Yellow	SC	1-SC
Painted Turtle - Intermountain - Rocky Mountain population	*Chrysemys picta* pop 2	S3?/G5T2T3Q	Blue	SC	1-SC
Fish					
Westslope Cutthroat Trout	*Oncorhynchus clarkii lewisi*	S2S3/G5T4	Blue	SC	1-SC
Gastropods					
Coeur d'Alene Oregonian	*Cryptomastix mullani*	S3/G4	Blue	-	-
Dusky Fossaria	*Galba dalli*	S3S4/G5	Blue	-	-
Glossy Valvata	*Valvata humeralis*	S1S3/G5	Red	-	-
Magnum Mantleslug	*Magnipelta mycophaga*	S2S3/G3	Blue	SC	1-SC
Pale Jumping-slug	*Hemphillia camelus*	S3/G4	Blue	-	-
Prairie Fossaria	*Galba bulimoides*	S3?/G5	Blue	-	-

Table H-1: Wildlife and Fish Species at Risk with Potential to Occur in the Project Vicinity

Common Name	Scientific Name	Provincial/ Global Status[a]	BC List[b]	COSEWIC[c]	SARA[d]
Pygmy Slug	*Kootenaia burkei*	S3/G3	Blue	SC	1-SC
Sheathed Slug	*Zacoleus idahoensis*	S3?/G3G4	Blue	SC	1-SC
Star Gyro	*Gyraulus crista*	S3S4/G5	Blue	-	-
Subalpine Mountainsnail	*Oreohelix subrudis*	S3/G5	Blue	-	-
Threeridge Valvata	*Valvata tricarinata*	S1S2/G5	Red	-	-
Widelip Pondsnail	*Stagnicola traski*	S3S4/G3G4	Blue	-	-
Insects					
Albert's Fritillary	*Boloria alberta*	S3/G3	Blue	-	-
Aphrodite Fritillary, manitoba subspecies	*Speyeria aphrodite manitoba*	S3?/G5T5	Blue	-	-
Aphrodite Fritillary, whitehousei subspecies	*Speyeria aphrodite whitehousei*	S3/G5T4	Blue	-	-
Bronze Copper	*Lycaena hyllus*	S3/G5	Blue	-	-
Brown-belted Bumble Bee	*Bombus griseocollis*	S3S4/G5	Blue	-	-
Checkered Skipper	*Pyrgus communis*	S3/G5	Blue	-	-
Dione Copper	*Lycaena dione*	S2/G5	Red	-	-
Eastern Tailed Blue	*Cupido comyntas*	S3/G5	Blue	-	-
Fernald’s Cuckoo Bumble Bee	*Bombus flavidus*	S3S4/G5?	Blue	-	-
Gillette's Checkerspot	*Euphydryas gillettii*	S2S3/G3	Blue	-	-
Gypsy Cuckoo Bumble Bee	*Bombus bohemicus*	S1S2/G3G5	Red	E	1-E
Hairy-necked Tiger Beetle	*Cicindela hirticollis*	S2S4/G5	Blue	-	-
Jutta Arctic, chermocki subspecies	*Oeneis jutta chermocki*	S3/G5T4Q	Blue	-	-
Mead's Sulphur	*Colias meadii*	S3/G5	Blue	-	-
Monarch	*Danaus plexippus*	S1?B/G4	Red	E	1-E
Morrisoni Bumble Bee	*Bombs morrisoni*	SH/G3	Red	-	-
Nevada Skipper	*Hesperia nevada*	S3S4/G5	Blue	-	-
Old World Swallowtail, dodi subspecies	*Papilio machaon dodi*	S1/G5T4T5	Red	-	-
Silver-spotted Skipper, clarus subspecies	*Epargyreus clarus clarus*	S3/G5T5	Blue	-	-
Suckley’s Cuckoo Bumble Bee	*Bombus suckleyi*	S3S4/G2G3	Blue	T	-
Tawny-edged Skipper, themistocles subspecies	*Polites themistocles themistocles*	S3/G5TNR	Blue	-	-
Variegated Fritillary	*Euptoieta claudia*	S3N/G5	Blue	-	-
Vivid Dancer	*Argia vivda*	S3/G5	Blue	SC	1-SC
Western Bumble Bee	*Bombus occidentalis*	S4/G3	Yellow	T	1-T
Yellow-banded Bumble Bee	*Bombus terricola*	S3S4/G3G4	Blue	SC	1-SC

(a) S = Provincial; G = Global; T = Species Variety Ranking; 1 = Critically Imperiled; 2 = Imperiled; 3 = Vulnerable; 4 = Apparently Secure; 5 = Secure; ? = Not Certain; H = Historical (possibly extirpated); NR = Not Ranked; U = Unrankable; Q = Questionable Taxonomy; B = Breeding; N = Non-breeding (BC CDC 2025).

(b) Red = Extirpated, Endangered, or Threatened; Blue = Special Concern; Yellow = Not at Risk (BC CDC 2025).

(c) COSEWIC (Committee on the Status of Endangered Wildlife in Canada); - = not listed; E = Endangered; T = Threatened; SC = Special Concern; NAR = Not at Risk (Government of Canada 2025).

(d) SARA (*Species at Risk Act*); - = not listed; Schedule 1 status: E = Endangered T = Threatened; SC = Special Concern (Government of Canada 2025).

(e) Formerly Northern Goshawk (*Accipiter gentilis atricapillus*).

H2.0 References

BC CDC (British Columbia Conservation Data Centre). 2025. BC Species and Ecosystems Explorer. http://a100.gov.bc.ca/pub/eswp/ [accessed March 2025].

Government of Canada. 2025. Species at Risk Public Registry. https://wildlife-species.canada.ca/species-risk-registry/sar/index/default_e.cfm. [accessed March 2025].

Appendix I: Potential Project–Environment Interactions and Mitigations

Table I-1: Potential Project-Environment Interactions and Mitigations

Environment Component	Potential Project-Environment Interactions	Potential Cumulative Effects	Plausible Mitigations
Physical Environment			
Geology, Soils and Terrain	• Changes to surficial geology and terrain (e.g., slope, angle and elevation) from overburden removal, storage of mine rock and the development of an open-pit mine. • Changes to soil quantity and distribution from vegetation removal, overburden removal, storage of mine rock and the development of an open-pit mine. • Changes to soil quality (e.g., productivity, decomposition processes, nutrient cycling and restoration potential) due to changes in soil chemical and physical characteristics during mining and reclamation activities, including potential soil contamination from dust deposition, accidental spills or releases of fuel or other hazardous materials. • Implications of the above potential changes to reclamation success.	• Changes to soil chemical and physical characteristics from combustion and fugitive dust emissions at other existing and reasonably foreseeable developments (e.g., other mines, use of forestry roads) can act cumulatively to adversely affect soil quality.	• Management practices for soil erosion control and spill prevention/management plans. • Management practices and environmental management plans for air quality and dust control. • Implement a reclamation and closure plan incorporating soil salvage plans, recontouring and targeted land use objectives. • Soil salvage, soil stockpile, and soil placement management. • Use ecohydrological model to guide strategic soil placement to enhance reclamation success.
Groundwater quantity and quality	• Changes to groundwater quantity arising from modification to surface elevation and relief and the extents of geological and mine rock/waste materials. • Changes to groundwater quality arising from contact water infiltration originating from mine rock, pit walls, and surface watercourses. • Changes to groundwater quality arising from accidental spills of products used to support the Project.	• Changes to groundwater quantity and quality in valley bottom areas arising from other existing and reasonably foreseeable developments can act cumulatively with the Project.	• Work to prevent the interaction of non-contact water with the active mining areas and to safely reduce or minimize interaction of non-contact water with mining activities. This will include the evaluation of groundwater interception and modelling to be documented in the IS/A. • Overall Project design providing for contact water management and treatment and minimization of potential groundwater flow paths to areas downstream/outside of capture for treatment. • Place mine rock away from the Fording River, minimizing groundwater interaction. • Reduce pit shell depth to stay above the Fording River elevation, resulting in the reduced potential of contact water-groundwater interaction to the Fording River Valley bottom from the FRX Pit. • FRX Pit design that includes an unmined portion of Castle Mountain to the south and southeast, providing for minimization of pit groundwater flow towards Chauncey Creek during all Project stages. • Implement a reclamation and closure plan, including a closure water management plan. • Implement groundwater monitoring plans during construction and operation and adapt to findings, in accordance with the Project-specific Water Management Plan.

Table I-1: Potential Project-Environment Interactions and Mitigations

Environment Component	Potential Project-Environment Interactions	Potential Cumulative Effects	Plausible Mitigations

Surface Water Quantity and Quality	• Changes in flow regime and sediment loading in streams and rivers in the Elk Valley watershed and, potentially, downstream (e.g., Koocanusa Reservoir). Koocanusa Reservoir is a transboundary waterbody, draining from Canada into the state of Montana in the United States of America.
	• Erosion/deposition associated with changes in surface water flow regime.
	• Changes in water quality in streams and rivers in the Elk Valley watershed and, potentially, downstream (e.g., Koocanusa Reservoir), resulting from release of selenium, nitrate and other water quality constituents from mining and other disturbed areas.
	• Changes in groundwater/surface water interactions, including changes in base flows in streams and rivers in the Elk Valley watershed.
	• Changes in water quality in streams and rivers in the Elk Valley watershed due to interaction with mine-influenced groundwater.
		• Changes in flow regime and sediment loading from other existing and reasonably foreseeable development (e.g., other mines and developments) can act cumulatively to flows and sedimentation processes.
		• Changes in water quality from other existing and reasonably foreseeable development (e.g., other mines and developments) can act cumulatively to water quality in streams and rivers in the Elk Valley watershed.
			• Refined mine design from the July 2021 DPD to the current mine plan, resulting in reduction of 324 ha of disturbance and 1 Bbcm of mine rock.
			• Project design providing for no mine rock storage facility development in the Chauncey Creek watershed (avoid storage of mine rock in Chauncey Creek drainage).
			• Work to prevent the interaction of non-contact water with the active mining areas (pits, mine rock storage areas, TSF and access roads) through construction of diversions, pipelines or similar facilities, and to safely reduce or minimize interaction of non-contact water with mining activities. This will include the evaluation of groundwater interception and modelling to be documented in the IS/A.
			• The Project has been designed to be amenable to the application of EVR's source control construction techniques as they are currently understood taking into consideration the level of certainty and effectiveness associated with implementing these measures in the Elk Valley. Where these techniques are not yet proven, the current design may still provide source control benefits through its configuration. Examples include placing mine rock against the original ground, submerging certain mine rock, using bottom-up placement for a large portion of mine rock storage and capping legacy mine rock storage areas that were placed top-down. If future technologies are identified and proven through EVR's ongoing research and development, the Project would re-evaluate the implementation of source control and other treatment requirements as new information becomes available, and adjust plans as appropriate and following application for relevant approvals and authorizations working with Ktunaxa, including KNC and Yaq̓it ʔa·knuqƛi ʾit, on timing and prioritization.
			• Continue to evaluate best available technologies to decrease contaminant loading from tailings and/or use of tailings in support of in situ treatment and/or source control.
			• Use blast hole liner during blasting to reduce potential impact to nitrate constituent.
			• Optimization of backfilling for mine rock storage to support management of water quality for treatment and minimize new disturbance:
			  ○ Placing approximately 84% of the mine rock in backfilled pits or existing disturbance.
			  ○ Three locations were selected for mine rock storage for the Project: the Kilmarnock Creek drainage (which already contains some mine rock within the current C-3 Permitted Mine Area), the Eagle Pit (currently being mined as part of the existing FRO), and the FRX Pit once areas become available for progressive backfilling.
			  ○ Incorporating treatment into the design for the FRX Pit to support management of water quality.
			  ○ Storing mine rock (approximately 57%) upstream of existing treatment (i.e., Kilmarnock, Eagle).
			  ○ Partially submerging of mine rock in the FRX Pit following closure, decreasing volume exposed to long-term oxidation and increasing passive removal of target constituents from water in subsurface (selenium and nitrate).
			• Work with Ktunaxa, including direct engagement with KNC and Yaq̓it ʔa·knuqƛi ʾit, to optimize mine rock placement through the assessment.
			• FRX Pit design that includes an unmined portion of Castle Mountain to the south and southeast, providing for minimization of pit groundwater flow towards Chauncey Creek during all Project stages.
			• Reduce pit shell depth to stay above the Fording River elevation, resulting in the reduced potential of contact water-groundwater interaction to the Fording River Valley bottom from the FRX Pit.
			• Evaluate how to optimally design or reduce sediment ponds or alternative options for water management to reduce potential for selenium speciation during operation and in closure.
			• Consider the use of phytoremediation such as floating mats of cat-tails for treatment.
			• Undertake a feasibility study or analysis to assess the potential for secondary/tertiary treatment for phytoremediation.
			• Evaluate sources of mine-influenced contact water that could be further influenced by the Project including the Kilmarnock Creek drainage, Clode Creek drainage, and FRX Pit to determine the potential required treatment based on proven technologies (Technology

Table I-1: Potential Project-Environment Interactions and Mitigations

Environment Component	Potential Project-Environment Interactions	Potential Cumulative Effects	Plausible Mitigations
			Readiness Level 7 or higher), building on successes and learnings, including: ○ possible available treatment capacity at the FRO-S-AWTF ○ possible addition of treatment capacity at the FRO-S-AWTF ○ possible available treatment capacity at FRO-N SRF ○ possible addition of treatment capacity at FRO-N SRF ○ possible construction of additional treatment facilities (e.g., a new SRF); there are currently two locations where an SRF could be designed into the mine plan (in the north and south halves of the FRX Pit). • Integrate relevant regional management plans (e.g., the Nickel Management Strategy, Calcite Management Plan) objectives into Project planning. • Evaluate feasibility (technical and economic) and environmental impacts, including water temperature, of water treatment and water management options. • In alignment with the EVWQP, the Project will meet the requirements in the *Environmental Management Act* Permit 107517, including the construction and operation of treatment facilities on the timelines specified and achievement of water quality limits. In addition, the Project will meet site-specific *Mines Act* C-Permits that were amended to include a condition for an IPA to be submitted to the Chief Inspector. • Incorporate the Project (if approved), including mitigations planned to manage surface water quality and flows, into EVR's EVWQP, including the next iteration of the Regional Water Quality Model Update IPA; updating monitoring programs related to tracking EVR's progress toward the objectives in the EVWQP to incorporate receiving environment conditions potentially influenced by the Project; and implementing mitigation adjustments as necessary to maintain the mitigation's effectiveness, consistent with EVR's existing adaptive management framework. • Stage the Project, providing an opportunity to improve certainty associated with water treatment activities before moving on to a subsequent stage. • Continue to evaluate additional methods of treatment for other constituents, including the use of the reservoir, anti-scalants, ROHDS, or other technologies, where feasible. • Management practices and environmental management plans for air quality and dust control. Evaluate options of treatment or conservation beyond the Project to consider reductions in cumulative effects from other industries or impacts as an offsetting measure. • Continue to evaluate and implement water reduction measures and leverage those already in place at FRO. • Avoidance of any mine footprint in the Castle Mountain West Unnamed Stream 7 drainage. • Continue EVR's recycling program and evaluate supplemental options to no longer put garbage within mine rock storage areas, including haul truck tires. • Reduction of volume of castover expected through the implementation of castover management practices, resulting in reduced impact to the Chauncey Creek watershed. • Continue to investigate and implement changes to blasting practices and application of castover management to minimize impacts from fly rock and castover, particularly to reduce castover on the east slope of Castle Mountain into the Chauncey Creek drainage or adjacent to culturally sensitive areas. This could include the evaluation of techniques such as of berms, netting, excavation, or blasting techniques and/or using best achievable technology assessment methods (BC ENV 2024). • Develop and implement a Chauncey Creek Management Plan with input from Ktunaxa Nation, including KNC and Yaq̓it ʔa·knuqƛi 'it. • Reduce expected dust suppression water usage requirements, resulting in reduced water withdrawals due to the Project. • Implement a reservoir to store water that is dewatered from the FRX Pit areas and/or from the Kilmarnock Creek watershed, as well as discharge during low flow periods, resulting in reduced impacts to flows in the Fording River during operations. • Sequentially fill the two sides of the FRX Pit, resulting in reduced impacts to flows in the Fording River during closure. • Potential for use of less water in future through new tailings technology including evaluation

Table I-1: Potential Project-Environment Interactions and Mitigations

Environment Component	Potential Project-Environment Interactions	Potential Cumulative Effects	Plausible Mitigations
			and use of dewatered tailings. • Conduct an environmental flow needs assessment, including affected reaches of the Fording River as part of developing the IS/A; continue to engage with Ktunaxa Nation, including direct engagement with KNC and Yaq̓it ʔa·knuqƛi ’it, throughout the environmental flow needs assessment process to collaboratively develop mitigations for implementation into the Project. • Engage with Ktunaxa Nation, including direct engagement with KNC and Yaq̓it ʔa·knuqƛi ’it, during the assessment phase to collaboratively develop mitigations to be implemented for the Project, including developing more defined mitigations including consideration of end land use goals considering Ktunaxa values, which include re-establishing surface water and creating functionality. • Develop a restoration plan that balances the objective of optimizing habitat for species and communities impacted by the Project that are of the highest conservation value or greatest concern to land users and land stewards including potentially affected Indigenous Peoples (referred to as priority ecosystems and include high elevation grasslands and brushlands and old and mature forests). This plan should recognize the limitations and uncertainties associated with reclamation in mountain environments and anticipates the limitations that may be associated with offsetting required after implementation of the restoration plan. • Integrate water management into reclamation and closure planning. • Rehabilitate, where feasible, stream and riparian habitat impacts arising from mine rock storage areas, temporary access or construction through road deactivation and reclamation of stream and riparian habitat using native substrate, soil and planting prescriptions (impacts to streams and riparian habitats will be quantified in the IS/A). • Work with Ktunaxa Nation, including through direct engagement with KNC and Yaq̓it ʔa·knuqƛi ’it, to incorporate Ktunaxa restoration guidelines and perspectives, through Ktunaxa Perspectives on, and Principles for, Reclamation and Restoration in Qukin ʔamakʔis and the Elk Valley. • Conduct ongoing monitoring and comprehensive review and adaptation of the mitigation plan to address cumulative effects on water quality, per condition of EVR’s existing permits including monitoring programs involving ʔa·knusti. • Consider further options and outcomes of the International Joint Commission Study Board, when available.
Air Quality, Noise and Vibrations	• Fugitive dust emissions from material handling and processing can result in increases in ambient particulate matter concentrations that can negatively affect human and wildlife health, soil, vegetation and waterbodies. Such changes can contribute to changes in ecosystem condition. • Combustion emissions from vehicles and equipment can result in increases in ambient concentrations of carbon monoxide, nitrogen dioxide, sulphur dioxide and other contaminants that can negatively affect human and wildlife health, water and vegetation. Such changes can contribute to changes to ecosystem condition. • Increases and/or temporal extension in greenhouse gas emissions have the potential to affect climate change. • Noise and/or vibrations from blasting, vehicles and Project activities. • Changes to air quality, noise and vibrations can cause sensory changes that affect people and wildlife (see Terrestrial Resources, Land Use & Visual Aesthetics below).	• Fugitive dust emissions from other existing and reasonably foreseeable development (e.g., other mines, use of forestry roads) can act cumulatively to increase ambient particulate matter concentrations. • Combustion emissions from other existing and reasonably foreseeable development (e.g., other mines, wood burning, vehicle traffic) can act cumulatively to increase ambient concentrations of carbon monoxide, nitrogen dioxide, sulphur dioxide and other contaminants. Noise from other existing and reasonably foreseeable development (e.g., other mines) can act cumulatively to increase ambient noise levels.	• Implementation of an air quality and fugitive dust control plan that supports EVR’s carbon neutrality goals/commitments to climate action. • Considering opportunities for adopting new technologies as they become available and technically and economically feasible for use. • Continue to implement air monitoring program with updates relevant to the Project. • Efficient operation of the vehicle fleet, and equipment/coal dryer to minimize air emissions. • Investigation of other options to reduce air emissions/ consideration of alternative technologies (e.g., electric vehicles). • Use of noise minimization equipment where appropriate.

Table I-1: Potential Project-Environment Interactions and Mitigations

Environment Component	Potential Project-Environment Interactions	Potential Cumulative Effects	Plausible Mitigations
Biological Environment			
Terrestrial Resources	• Direct loss, temporal loss, or change in quality, quantity and distribution of vegetation and wildlife habitat, including rare and listed ecosystems, ecological communities, species at risk and migratory birds as defined in Subsection 2(1) of the *Migratory Birds Convention Act*, 1994. • Sensory disturbance to wildlife, including migratory birds and species at risk (e.g., noise, light). • Disruption of wildlife, including species at risk and migratory bird movement patterns in the regional landscape. • Accidental direct mortality of wildlife, including species at risk and migratory birds, due to construction, operations, traffic. • Bird fatalities resulting directly from collisions with artificial light sources or indirectly due to disorientation, energy depletion and subsequent predation. • Displacement of wildlife, including species at risk and migratory birds, and consequences to adjacent areas (e.g., competition, predation, overgrazing). • Displacement of native vegetation including culturally important and listed plants and communities by encroaching weeds. • Health effects on vegetation and wildlife, including migratory birds, due to changes in air, water and soil quality, and exposure to potential contaminants of concern. • Increased stress and reproductive impairment to wildlife associated with potential changes to habitat and health. • Increased protection for certain species due to access restrictions. • Influence of the above factors on ecosystem function. • The potential implications of the effects of the Project on transboundary populations (e.g., BC Alberta boundary) and/or populations that rely on provincial and federal parks or conservation areas, including potential impacts from aerial deposition.	• Direct habitat losses or changes to the quality, quantity and distribution of terrestrial habitats from other existing and reasonably foreseeable developments (e.g., other mines, forestry, residential and commercial development) can act cumulatively to reduce habitat availability and suitability for terrestrial resources in the Elk Valley watershed. • Changes to the physical and biological terrestrial environment from other existing and reasonably foreseeable developments (e.g., other mines, forestry, residential and commercial development) can act cumulatively to adversely affect the abundance, distribution and condition of terrestrial resources and ecosystem function in the Elk Valley watershed. • Changes to air, water and soil quality from other existing and reasonably foreseeable developments (e.g., other mines, forestry, residential and commercial development) can act cumulatively to adversely affect the health of terrestrial resources and species in the Elk Valley watershed.	• Refined mine design from the July 2021 DPD to the current mine plan, reducing overall disturbance footprint by 324 ha and the volume of mine rock by 1 Bbcm, reducing impacts to biodiversity and terrestrial habitat overall, including habitat for bighorn sheep, grizzly bear, and red and blue-listed grassland and brushland ecosystems. • Relocation of the south sediment ponds relative to the July 2021 DPD resulting in reduced disturbance of 20.3 ha of wetland ecosystems, 24.8 ha of red-listed grassland ecosystems, 11.4 ha of blue-listed bushland ecosystems and 101.2 ha of dry mesic forest ecosystems. • Optimized mine design within the terrestrial footprint by maximizing use of previously disturbed areas. • Reduce mine footprint through progressive development of the mine, optimizing mine rock placement, and progressive and interim reclamation. • Implement appropriate management practices and ecosystem/species management plans (e.g., Bird Guidance (Canada), Invasive Plant Management Plan, FRO's Wildlife Mitigation Management Plan, EVR's Draft High Elevation Grassland Ecosystem Management Plan and the Whitebark Pine Species Management Plan), which will include mitigation measures to reduce impacts to these VCs. This includes iimplementing management actions to avoid impacts to nesting birds, avoid disturbance to important wildlife life phases, minimize negative interactions between people and wildlife and to reduce/eliminate grizzly bear mortality during operations. • Follow the Grizzly Bear Denning Management Plan to avoid grizzly bear mortality associated with clearing while bears are denning, including using denning habitat suitability mapping and field surveys to identify potential dens ahead of Project work. • Review the Grizzly Bear Denning Management Plan with Ktunaxa, including KNC and Yaq̓it ʔa·knuqƛi 'it, during the environmental assessment. • Follow best practices to limit noise and light disturbance. • Develop strategically located mineral licks to keep bighorn sheep and other ungulates away from active mine roads, active mining and other mining-related activities. • Work with Ktunaxa, including through direct engagement with KNC and Yaq̓it ʔa·knuqƛi 'it, to integrate Ktunaxa knowledge into management plans through the development of the IS/A. • Consider regional initiatives, plans and programs in prioritizing minimization efforts. • Follow Ktunaxa Forestry Standards Document and work with KNC and Yaq̓it ʔa·knuqƛi 'it when timber clearing to minimize impacts to wildlife habitat or cultural value areas. • Work with KNC and Yaq̓it ʔa·knuqƛi 'it to review and revised the list of invasive plants to reflect Ktunaxa perspective, avoid and minimize impacts associated with introduction of invasive plants, and to establish monitoring ecosystem/plant indicators and thresholds to assess health of areas (high/medium/low). • Investigate and implement changes to blasting practices and application of castover management to minimize impacts from fly rock and castover, particularly to reduce castover on the east slope of Castle Mountain into the Chauncey Creek drainage or adjacent to culturally sensitive areas. This could include the evaluation of techniques such as of berms, netting, excavation, or blasting techniques and/or using best achievable technology assessment methods (BC ENV 2024). • Continue EVR's recycling program and evaluate supplemental options to no longer put garbage within mine rock storage areas, including haul truck tires. • Conduct trials of grassland reclamation at existing reclamation sites within EVR's operations in the Elk Valley with input from KNC and Yaq̓it ʔa·knuqƛi 'it. • Undergo engagement within the assessment phase with KNC and Yaq̓it ʔa·knuqƛi 'it including developing end land use goals considering Ktunaxa values, which include re-establishing surface water and creating functionality. • Develop a restoration plan that balances the objective of optimizing habitat for species and communities impacted by the Project that are of the highest conservation value or greatest concern to land users and land stewards including potentially affected Indigenous Peoples, referred to as priority ecosystems and include high elevation grasslands and brushlands and

Table I-1: Potential Project-Environment Interactions and Mitigations

Environment Component	Potential Project-Environment Interactions	Potential Cumulative Effects	Plausible Mitigations

			old and mature forests (e.g., incorporate evidence-based planning that optimizes grassland and brushland reclamation on the reclamation landform, which may include temporary areas). This plan should recognize the limitations and uncertainties associated with reclamation in mountain environments and anticipates the limitations that may be associated with offsetting required after implementation of the restoration plan.
			• Collect native cones and seeds and expansion/establishment of seedbeds/nurseries to improve availability of key grassland ecosystems within the Project footprint.
			• Collect cones from healthy whitebark pine within disturbance areas and transplant healthy young individuals ahead of disturbance, where applicable and feasible, to preserve genetics from local populations and promote establishment of white pine blister rust disease-resistant individuals.
			• Establish and operate a whitebark pine orchard to secure a rust-resistant seed source for reclamation, offsetting and other regional projects, contributing to blister rust resistance efforts (seed and parent trees).
			• Assess the possibility of establishing a second whitebark pine orchard with the location determined in collaboration with KNC and Yaq̓it ʔa·knuqƛi ’it.
			• Use whitebark pine in reclamation areas and explore opportunities for whitebark pine nurseries.
			• Target restoration of bighorn sheep habitat, including winter range, in the restoration plan with input from KNC and Yaq̓it ʔa·knuqƛi ’it.
			• Implement the newly developed seeding guidelines for operations in the Elk Valley including seeding prescriptions for bighorn sheep forage.
			• Integrate habitat features into the closure landscape to promote use by bighorn sheep, including design of escape terrain (steep areas near forage) and connected ridgelines in the final landform design. The Province will need to support initiatives to accept changes to landform design.
			• Establish and identify foraging sites specifically for sheep to relieve grazing pressure from elk on key bighorn sheep forage.
			• Prioritize grassland and brushland ecosystems and integrate forested ecosystems into the rehabilitation plan for the Project to create habitat for grizzly bears.
			• Select berry plants to support grizzly bear habitat in reclamation prescriptions and planting.
			• Design a reclaimed landform with input from KNC and Yaq̓it ʔa·knuqƛi ’it to support functional grizzly bear habitat, incorporating connectivity, avalanche terrain, and the consideration of cultural and temporal factors.
			• Development and implementation of landscape level information and design in reclamation and closure planning to support habitat connectivity.
			• Evaluate reclamation research opportunities to contribute to reclamation planning.
			• Consider climate appropriate habitats and ecosystems for future climate scenarios in the restoration plan.
			• Commit to, as part of the restoration plan, conducting studies to reduce reclamation uncertainty, with input from KNC and Yaq̓it ʔa·knuqƛi ’it, which would include Ktunaxa knowledge, science, and monitoring data.
			• Evaluate alternative methods (e.g., optimal topsoil depth over coarse coal rejects and/or overburden) for restoring ecosystems:
			  ○ Commit to methods and target area values for restoring grassland and brushland ecosystems.
			  ○ Investigate wetland opportunities through reclamation. Reclamation prescriptions determined to be successful could be applied to the Project.
			• Seek opportunities to improve previously regionally reclaimed areas that are not functional or high-quality.
			• Stage the Project to provide an opportunity to improve certainty associated with reclamation activities focused on terrestrial habitat and biodiversity overall. Staging the Project may also increase the flexibility associated with bonding requirements.

Table I-1: Potential Project-Environment Interactions and Mitigations

Environment Component	Potential Project-Environment Interactions	Potential Cumulative Effects	Plausible Mitigations
			• Align rehabilitation and conservation priorities and efforts with regional initiatives, plans and programs such as the EV-CEMF. • Implement a reclamation and closure plan integrating EVR's commitment to becoming nature positive. • Where residual effects are unavoidable through application of avoidance, minimization and/or rehabilitation, apply an offsetting strategy. Offsetting opportunities to be identified in alignment with EVR's environmental mitigation hierarchy and through engagement with government, potentially affected Indigenous Peoples, and local communities. Offsetting will include: o Working with Ktunaxa, including through direct engagement with KNC and Yaq̓it ʔa·knuqƛi 'it, to identify offsetting opportunities, including considerations of location and function. o Creating wetlands and enhancing degraded wetlands in partnership with Ducks Unlimited and Kerr Wood Leidal at off-site locations, or other opportunities. o Acquisition of additional private lands for conservation and offsetting. o Initiating long-term monitoring plots in recent wildfire areas on Greenhills Ridge (Mount Bingay) to monitor community change post-fire and confirm whether actions can be taken to enhance or maintain grassland conditions. o Conducting forest encroachment treatments to increase the extent and quality of grasslands. o Exploring opportunities within the assessment study area and then subsequently, if necessary, beyond these areas for the occurrence of grasslands and offsetting opportunities, including temporal considerations and existing impacts. o Rehabilitating legacy exploration roads using natural regeneration and/or native seeding in other areas of the Elk Valley, primarily within and adjacent to grasslands and brushlands with input from KNC and Yaq̓it ʔa·knuqƛi 'it. o Closing and reclaiming roads in EVR's Private Lands and Conservation Lands. o In partnership with government, industry and other interested parties, implementing highway and railway fencing/underpass mitigation to address habitat connectivity loss and road/rail mortality, with input from Ktunaxa Nation, including KNC and Yaq̓it ʔa·knuqƛi 'it. o Contribute meaningfully to initiatives including road rehabilitation and crossing structures that reduce the potential for human–grizzly bear conflict in the Elk Valley with input from KNC and Yaq̓it ʔa·knuqƛi 'it and considering other human activities in the region in addition to mining. o Contribute to offsetting through supporting regional Ktunaxa initiatives that may or may not be centrally focused on Qukin ʔamakʔis. These initiatives would be identified by Ktunaxa, and would align with Ktunaxa rights in respect of self determination (e.g., supporting the Bringing the Salmon Home initiative to support grizzly bear food supply). o Support Elk Valley communities to become Bear Smart. • Conduct modelling to quantify the specific effect that mitigations have on VC habitat quality and quantity, incorporate feedback from Ktunaxa, and document findings in the IS/A. Consideration will be given to the ongoing work being carried out by the Biodiversity Management Technical Advisory Group to support FRO's Biodiversity Management Plan, which reflects an improved understanding of the impacts and effectiveness of mitigation actions.

Table I-1: Potential Project-Environment Interactions and Mitigations

Environment Component	Potential Project-Environment Interactions	Potential Cumulative Effects	Plausible Mitigations

Aquatic Resources[(a)]	• In the Fording River watershed upstream of Joesphine Falls:
	  ○ Direct loss or change in quality, quantity and distribution of aquatic habitat, including westslope cutthroat trout habitat, resulting from pit development, placement of mine rock, and other mine infrastructure.
	  ○ Change in quantity and quality of aquatic habitat, including westslope cutthroat trout habitat, resulting from alteration of surface/ groundwater flows.
	  ○ Change in quality of aquatic habitat, including westslope cutthroat trout habitat, resulting from deposition of calcite and sediment loading.
	  ○ Health effects to aquatic resources and aquatic dependent species (e.g., westslope cutthroat trout, benthic invertebrates, amphibians, birds, including migratory birds) due to changes in water quality.
	  ○ Direct loss of or changes to instream, riparian and wetland habitats and function, and related changes to quantity and quality of fish habitat.
	• Potential interactions between the Project and fish species downstream of Josephine Falls (e.g., Bull Trout, Mountain Whitefish) via changes in flows or water quality.
	• Influence of the above factors on relative abundance, distribution and condition of aquatic dependent populations, including, potentially, transboundary populations (e.g., populations in Koocanusa Reservoir).
	• Influence of the above factors on ecosystem function.
		• Direct habitat losses or changes to the quality, quantity and distribution of aquatic habitat from other existing and reasonably foreseeable developments (e.g., other mines, forestry, residential and commercial development) can act cumulatively to reduce habitat availability and suitability for aquatic resources.
		• Changes to water quality from other existing and reasonably foreseeable developments (e.g., other mines, forestry, residential and commercial development) can act cumulatively to adversely affect the health of aquatic resources and aquatic dependent species.
		• Changes to the physical and biological aquatic environment from other existing and reasonably foreseeable developments (e.g., other mines, forestry, residential and commercial development) can act cumulatively to adversely affect the abundance, distribution and condition of aquatic resources and ecosystem function.
			• Refined mine design from the July 2021 DPD to the current mine plan, reducing overall disturbance footprint by 324 ha and the volume of mine rock by 1 Bbcm.
			• Avoiding mine footprint in the Castle Mountain West Unnamed Stream 7, resulting in avoiding the physical loss of 2,263 m^2 of aquatic habitat and 72.4 ha of riparian habitat.
			• Removal of the South Sedimentation Pond from the Fording River flood plain, avoiding direct footprint impacts to fish-bearing habitat in the Fording River oxbow (1,877 m^2) and lower reach of Castle Mountain West Unnamed Stream 5 (1,536 m^2), as well as riparian habitat impacts (35.9 ha).
			• Avoid and/or minimize Project direct loss of aquatic habitat through careful selection of mine pit and mine rock storage locations.
			• Reduce mine footprint through progressive development of the mine and optimizing mine rock placement.
			• Avoiding storage of mine rock in Chauncey Creek drainage.
			• Reduce the volume of castover through implementation of castover management practices to reduce impacts to flows in Chauncey Creek and continuing to investigate and implement changes to blasting practices and application of castover management to minimize impacts from fly rock and castover, particularly on the east slope of Castle Mountain into the Chauncey Creek drainage and adjacent to culturally sensitive areas (see above).
			• Developing and implementing a Chauncey Creek Management Plan with input from Ktunaxa Nation, including KNC and Yaq̓it ʔa·knuqƛi ʾit.
			• Implement other appropriate management practices (e.g., Standards and Practices for Instream Works) and environmental management plans (e.g., Erosion and Sediment Control Plan). This includes monitoring water quality per current plans and adapting to findings.
			• Reduce expected dust suppression water usage requirements through the mine design, resulting in reduced water withdrawals due to the Project. Water withdrawals due to the Project will be quantified in the IS/A.
			• Implement a reservoir to store water that is dewatered from the FRX Pit areas and/or from the Kilmarnock Creek watershed, and discharge during low flow periods, resulting in reduced impacts to flows in the Fording River during operations.
			• Sequentially fill the two sides of the FRX Pit, resulting in reduced impacts to flows in the Fording River during closure.
			• Mitigations identified above to avoid, reduce and treat water quality effects associated with contaminant loading and treat water are expected to avoid and minimize surface water quality-related impacts on aquatic biota including monitoring programs involving ʔa·knusti.
			• Assess groundwater seepage as part of developing the IS/A.
			• Undergo engagement within the assessment phase with KNC and Yaq̓it ʔa·knuqƛi ʾit including developing end land use goals considering Ktunaxa values, which include re-establishing surface water and creating functionality.
			• Develop a restoration plan that balances the objective of optimizing habitat for species and communities impacted by the Project that are of the highest conservation value or greatest concern to land users and land stewards including potentially affected Indigenous Peoples (referred to as priority ecosystems). This plan should recognize the limitations and uncertainties associated with reclamation in mountain environments and anticipate the limitations that may be associated with offsetting required after implementation of the restoration plan.
			• Rehabilitate, where feasible, stream and riparian habitat impacts arising from temporary access or construction through road deactivation and reclamation of stream and riparian habitat using native substrate, soil and planting prescriptions.

Table I-1: Potential Project-Environment Interactions and Mitigations

Environment Component	Potential Project-Environment Interactions	Potential Cumulative Effects	Plausible Mitigations

			• Quantify impacts to streams and riparian habitats as part of the IS/A and engage with Ktunaxa Nation, including direct engagement with KNC and Yaq̓it ʔa·knuqƛi ’it, to collaboratively develop mitigations to be implemented for the Project.
			• Conduct an environmental flow needs assessment, including affected reaches of the Fording River as part of developing the IS/A; continue to engage with Ktunaxa Nation, including direct engagement with KNC and Yaq̓it ʔa·knuqƛi ’it, throughout the environmental flow needs assessment process to collaboratively develop mitigations for implementation into the Project.
			• Develop an offset plan with KNC and Yaq̓it ʔa·knuqƛi ’it to compensate for unavoidable harmful alteration, disruption or destruction of fish habitat.
			• Implement monitoring programs, including effectiveness monitoring, involving ʔa·knusti within the offsetting plan and develop these programs with input from Ktunaxa Nation, including KNC and Yaq̓it ʔa·knuqƛi ’it.
			• Plan offsetting to support WCT population recovery and success in the upper Fording River.
			• Contribute to offsetting through supporting Ktunaxa initiatives in Qukin ʔamakʔis, based on Ktunaxa priorities. These support access to safe foods while other mitigations and offsets for WCT. These initiatives would be identified by Ktunaxa, including KNC and Yaq̓it ʔa·knuqƛi ’it, and would align with Ktunaxa rights in respect of food sovereignty. These may include:
			  ○ Supporting initiatives for the connectivity and habitat of Burbot.
			  ○ Contributing to the Bringing the Salmon Home initiative.
			• Consider outcomes from current regional initiatives for WCT population recovery in Project planning.

Human Environment			

Archaeological Resources	• Interactions with archaeological sites or areas of archaeological potential, such as loss or degradation due to the implementation of ground-altering activities and/or capping (e.g. land clearing, mining, and development of mine rock storage areas or other facilities).	• Potential for disturbance (of archaeological sites or areas of archaeological potential) due to ongoing and future/planned exploratory activities and development work, and a lack of knowledge of the location of archaeological sites/areas of potential, including (but not limited to):
		  ○ ground-altering activities (machine work, grading, test-pitting, existing road use and road building/maintenance, sediment extraction, etc.),
		  ○ erosion/accretion (natural wind and water effects, changes in surrounding landscape that facilitate erosion/accretion, etc.),
		  ○ capping (inadvertent stockpiling or use of sensitive terrain for development activities).
			• Conduct archaeological desktop review(s) of regular, annual, and seasonally-planned, ground-altering activities so that archaeological sites and areas of archaeological potential are not impacted during development works or exploration activities.
			• Where possible, avoid recorded archaeological sites and unassessed areas of archaeological potential (including AOA polygons and AOPs) during both the planning and implementation phases of the Project.
			• Conduct archaeological impact assessments, under a *Heritage Conservation Act* (HCA) Heritage Inspection Permit where planned development could impact areas of archaeological potential that have not been subject to in-field assessment, and subsequently implement management plans including chance find procedures.
			• Conduct any required (i.e., unavoidable) archaeological site alterations under a HCA Alteration Permit, along with a concurrent Heritage Inspection Permit. This includes pre-development, systematic data recovery and impact assessment, and archaeological monitoring, screening, and data recovery during site alterations.

Economy	• Beneficial effect on local employment and labour income. • Potential effect on local labour market balance. • Beneficial effect on supplier contracting and revenues, and economic development. • Effect on local government revenues and expenditures. • Reduction in employment, contracting and local economic development at closure. • Effects that specifically or differentially impact diverse persons or groups and/or current or future generations.	• Cumulative effects on the economy are possible as a result of overlapping effects between construction and operations of the Project and changes to the economy from other reasonably foreseeable developments.	• Implement local employment policies and planning. • Planning for local procurement of goods and services. • Local skills inventory, training and skills development programs. • Environment, health, safety and community plans. • Support to local initiatives to address demand for housing and local services such as health services and education. • Targeted initiatives to address effects that specifically impact a sub-group(s) within the Elk Valley.

Table I-1: Potential Project-Environment Interactions and Mitigations

Environment Component	Potential Project-Environment Interactions	Potential Cumulative Effects	Plausible Mitigations
Social - Socio-community	• Potential effect on local population and demographics. • Demand on housing and temporary accommodation, and potential effect on availability and affordability. • Demand on local services (e.g., community and health) and infrastructure and potential effect on capacity and supply. • Demand on local road transportation and potential effect on road capacity and safety. • Effects that specifically or differentially impact diverse persons or groups and/or current or future generations.	• Cumulative socio-community effects are possible as a result of overlapping effects between construction and operations of the Project and changes to socio-community from other reasonably foreseeable developments.	• Project supply of construction worker accommodation. • Fire Services and Mutual Aid Agreements. • Collaborative monitoring of health, education, social service usage with local government and service providers. • Support to government housing, service and infrastructure development plans and initiatives. • Traffic management planning. • Targeted mitigation and/or enhancement to address specific or differential impacts to sub-groups.
Social - Land Use	• Potential for loss and/or disruption of area use and access for commercial (e.g., forestry, guide outfitting, trapping) and non-commercial (e.g., trails) land uses due to mining activity and extension of the FRO No Unauthorized Entry zone. • Potential indirect impacts to harvesting activities (e.g., berry-picking, trapping, hunting, fishing, guiding) from direct effects of mining activity to vegetation, wildlife and fish distribution or abundance. • Potential for change to environmental setting and quality of experience of commercial tourism (e.g., guided outfitters) and non-commercial recreational (e.g., hiking) or cultural use from effects of dust, noise, and visual disturbance.	• Cumulative effects on land and resource use are possible as a result of overlapping effects between construction and operations of the Project and from other reasonably foreseeable projects and developments.	• Access and use arrangements or agreements with land and resource users. • Management practices and environmental management plans for ecosystems, species, aquatic health, air quality, noise, and visual quality. • Ongoing engagement and communication related to access and use. • Apply land use objectives that are developed through consultation in reclamation and closure planning.
Social - Visual Aesthetics	• Visual disturbance resulting from vegetation removal and dust, the progressive alteration of landforms, and introduction of built features (e.g., facilities, linear corridors) that are inconsistent with the current natural landscape character. • Indirect effects to cultural, recreational, and tourism values that are related to changes to visual quality (e.g., enjoyment of scenic values) and sensory conditions.	• Cumulative effects on visual aesthetics are possible as a result of overlapping effects between construction and operations of the Project and changes to the landscape from other reasonably foreseeable developments, especially mining operations.	• Project mitigations and best practices to address potential visual effects. • Management practices and environmental management plans for vegetation, air quality and dust control. • Development and implementation of landscape level information and design in reclamation and closure planning.
Human Health and Well-being	• Increased particulate matter (dust) concentrations (i.e., PM2.5 and PM10), which may cause health risks to local communities. • Deposition of dust on soil and plants, which can result in uptake of metals, metalloids and polycyclic aromatic hydrocarbons from the soil/dust by plants which are then consumed by wildlife and people. • Changes in water quality to downstream waterbodies and as a result wildlife and fish tissue quality which may impact the health of people that consume water, wildlife and fish. • Changes to other indicators of health associated with other stresses associated with the Project (e.g., sensory effects, changes in lifestyle behaviours and concerns about other Project related effects). • Effects that specifically or differentially impact diverse persons or groups and/or current or future generations. • Worker and/or public safety consequences from a potential accident or malfunction (e.g., explosives or hazardous material incident).	• Potential cumulative effects on human health and well-being as a result of overlapping effects on air and water quality from other existing and reasonably foreseeable developments are possible.	• Management practices and environmental management plans for vegetation, air quality and dust control. • Implementation of water management plan, including water quality management mitigations (see mitigations listed for Groundwater Quantity and Quality and Surface Water Quantity and Quality). • Implementation of various monitoring and assessment programs (e.g., metals sampling of plant tissues at FRO, Ktunaxa Wild Foods study, regional groundwater monitoring program, health risk assessment under the EVWQP) to support evaluation of health risk, verify mitigation planning is effective and manage adaptively. Also see mitigations under Indigenous Peoples. • Public access management through signage, community outreach, and communications on safety near active mines and other potentially hazardous areas. • Emergency response procedures and environment, health safety and community work plans. • Development and implementation of landscape level information and design in reclamation and closure planning. • On-site provision of first aid and employee assistance programs. • Policies on worker health and safety including zero-tolerance substance abuse policy around alcohol, illegal drugs, and medications. • Strategy to address community safety and well-being collaboratively with local communities. • Targeted mitigation and/or enhancement to address specific or differential impacts to sub-groups.

Table I-1: Potential Project-Environment Interactions and Mitigations

Environment Component	Potential Project-Environment Interactions	Potential Cumulative Effects	Plausible Mitigations
Indigenous Peoples	The above-noted Project-environment interactions have the potential to affect potentially affected Indigenous Peoples within and outside of BC, either directly or indirectly. These interactions and the Project itself will be assessed for its potential to cause: • changes to physical, spiritual and cultural heritage, current use of land and resources for traditional purposes and structures, sites or things of historical, archaeological, paleontological or architectural, spiritual or cultural importance/significance • changes to health, social or economic conditions (e.g., related to food security, transmission of knowledge, employment and other interactions) • changes that specifically or differentially impact diverse persons or groups and/or current or future generations • changes to the exercise of Aboriginal and Treaty rights • effects on culture and ability to sustain intergenerational transfer of place-specific cultural knowledge Specifically, the Ktunaxa Nation has identified the following potential impacts of the Project on Ktunaxa and Ktunaxa rights: • Displacement from Castle Mountain and other lands and waters associated with the Project footprint to support the exercise of Ktunaxa hunting, fishing, harvesting and plant and mineral gathering. Includes consideration of impacts to preferred transportation routes, hunting areas, and habitation areas on Castle Mountain and along adjacent waterways due to loss of largely intact high elevation cultural landscape used for hunting and travel, and loss of an estimated 10 km of trails. • Infringement of Ktunaxa's right to harvest and rely on the water and fish in the Elk Valley downstream of the Project; includes consideration of impacts to Ktunaxa confidence in wild foods including ʔa·kpi̓ƛis (Ktunaxa "favourite food") and surface drinking water caused by increasing loads of contaminants from mine rock deposition added to water that already does not meet water quality guidelines. • Interference with and infringement of Ktunaxa stewardship and governance rights including the rights to protect and determine the use of lands and resources in accordance with the Ktunaxa value of ʔa·kxaṁis ḳapi qapsin – all living things. • Interference with and infringement of Ktunaxa's right to maintain a healthy culture through exercise of rights and cultural practices within the Project area, including the elimination of the ability of Ktunaxa to use the FRX Project area for purposes of knowledge and language transmission between generations. • Interference with and infringement of Ktunaxa's right to ownership of and control of mineral resources, including the right to determine how those resources will be used and the right to benefit from their use. • Interference with and infringement of Ktunaxa's relationship with the land, which is central to Ktunaxa identity, culture and way of being.	• Potential cumulative effects on Indigenous Peoples as a result of overlapping effects from the Project and other existing and reasonably foreseeable developments are possible.	• The assessment of the Project will consider the rights and interests of Indigenous Peoples in consultation, and where practicable, in collaboration with participating potentially affected Indigenous Peoples, the IAAC and the BC EAO. Similarly, the participating potentially affected Indigenous Peoples will be engaged on the evaluation and selection of mitigation measures to minimize potential effects on potentially affected Indigenous Peoples and their interests. • Proceeded through a robust engagement process to update the Revised DPD, aligned with United Nations Declaration on the Rights of Indigenous Peoples, the Declaration on the Rights of Indigenous Peoples Act and the dispute resolution process. • Continue to engage with KNC and Yaq̓it ʔa·knuqƚi 'it on opportunities to mitigate potentially adverse effects identified by KNC and Yaq̓it ʔa·knuqƚi 'it as the regulatory processes progresses and additional information becomes available (e.g., mine design, existing conditions, and assessments). • Continue to engage with KNC and Yaq̓it ʔa·knuqƚi 'it on mitigation measures through the assessment process beyond regulatory requirements for alignment on key concerns. • See the mitigations and enhancements for biophysical VCs (above) which are also proposed to help manage potential effects to potentially affected Indigenous Peoples. • Provide opportunities to harvest before disturbance to new areas and in reclamation areas. • Explore opportunities to minimize temporary disturbances, such as the use of mats to access areas in the winter and minimize ground disturbance. • Follow the Ktunaxa Forestry Standards Document and work with KNC and Yaq̓it ʔa·knuqƚi 'it when timber clearing to minimize impacts to wildlife habitat or cultural value areas. • Promptly re-seed and/or plant/transplant after temporary disturbances with culturally appropriate species where possible (e.g., after temporary access roads, laydowns, drill pads). Natural drainage patterns will also be restored, where possible, following temporary disturbance. • Avoid barriers to land access and knowledge of areas significant to Ktunaxa culture. • Support the access task group. • Engage with KNC and Yaq̓it ʔa·knuqƚi 'it to coordinate on a strategy to reduce changes to access due to road closures; this may include collaborative development of a schedule to minimize interference with harvesting and coordinated access through or across the site. • Staging the Project and requiring that EVR be in compliance with Environmental Assessment Certificate conditions, developed in consultation with KNC and Yaq̓it ʔa·knuqƚi 'it, before proceeding on to Stage 2 of the Project which allows for intergenerational decision making and can be used to support Ktunaxa stewardship and governance rights regarding land and resource use. • The staged Project provides opportunity to limit footprint-related impacts in lower Chauncey Creek until a decision is made to advance to Stage 2 of the Project and provides opportunity for continued exercise of rights in the southern portion of Castle Mountain and the Chauncey watershed, outside of the no access boundary. • Continue to investigate and implement changes to blasting practices and application of castover management to minimize impacts from fly rock and castover, particularly to reduce castover on the east slope of Castle Mountain into the Chauncey Creek drainage or adjacent to culturally sensitive areas. This could include the evaluation of techniques such as of berms, netting, excavation, or blasting techniques and/or using best achievable technology assessment methods (BC ENV 2024). • Through the Cultural Working Group, work to secure access to locations within EVR sites for specific ceremonial purposes for Ktunaxa spiritual leaders. The Cultural Working Group is also pursuing the finalization of a Cultural Management Plan which would both provide EVR access to Ktunaxa cultural knowledge and provide guidance on means by which that knowledge may be utilized within EVR operations.

Table I-1: Potential Project-Environment Interactions and Mitigations

Environment Component	Potential Project-Environment Interactions	Potential Cumulative Effects	Plausible Mitigations

			• Execute agreements with Ktunaxa in addition to the IMBA and Joint Management Agreement. EVR holds interim agreements with three of the four Ktunaxa First Nations which specifically contemplate the identification and pursuit of community priorities and cultural activities.
			• Provide support to KNC and Yaq̓it ʔa·knuqƛi ’it to enable application of Ktunaxa stewardship and governance through appropriate avenues.
			• Engage with KNC and Yaq̓it ʔa·knuqƛi ’it to develop end land use goals.
			• Align EVR’s reclamation objectives to KNC and Yaq̓it ʔa·knuqƛi ’it standards.
			• Collaborate with KNC and Yaq̓it ʔa·knuqƛi ’it on reclamation to best meet Ktunaxa standards (quality and pace).
			• Co-develop a management plan for reclamation prescription areas that are rooted both in western science-based approaches and Indigenous knowledge, with monitoring programs involving ʔa·knusti.
			• Provide opportunities to Ktunaxa Nation, including through direct engagement with KNC and Yaq̓it ʔa·knuqƛi ’it, to support and contribute to annual reclamation planning and the annual report.
			• Engage with KNC and Yaq̓it ʔa·knuqƛi ’it to collaboratively develop a strategy focused on revegetation of culturally significant species, which may include transplanting or other culturally appropriate methods.
			• Re-establish trail network connectivity and/or support trail mapping initiatives.
			• Continue to participate in the regional Human Health Risk Assessment required under the *Environmental Management Act* Permit 107517, sharing results with Ktunaxa Nation, including KNC and Yaq̓it ʔa·knuqƛi ’it, and providing support for communication materials to community members on monitoring results and maps.
			• Co-develop and implement a community-based monitoring and evaluation program with Ktunaxa Nation, including KNC and Yaq̓it ʔa·knuqƛi ’it, that is rooted in Indigenous knowledge and western science-based approaches (e.g., for water quality, resource quality) and which aims to increase confidence in wild foods harvesting and water quality, and effect on fish tissue and drinking water, working towards continuous improvement for water and food quality and confidence.
			• Provide opportunities for ʔa·knusti or KNC and Yaq̓it ʔa·knuqƛi ’it to co-monitor water quality, vegetation and wildlife impacted through Project activities.
			• Work with KNC and Yaq̓it ʔa·knuqƛi ’it to identify offsetting opportunities, including consideration of location and function.
			• Work with KNC and Yaq̓it ʔa·knuqƛi ’it to identify other potential areas they can access for safe harvesting (e.g., support KNC and Yaq̓it ʔa·knuqƛi ’it ability to access other intact high elevation cultural landscapes), whether through additional access to EVR-owned lands, acquiring private lands, or other methods; collaborate with KNC and Yaq̓it ʔa·knuqƛi ’it to review offsetting effectiveness.
			• Contribute to offsetting through supporting regional Ktunaxa initiatives that may or may not be centrally focused on Qukin ʔamakʔis. These initiatives would be identified by KNC and Yaq̓it ʔa·knuqƛi ’it and would align with Ktunaxa rights in respect for food sovereignty and respect of self determination:
			  ○ Support for initiatives for the connectivity and habitat of Burbot.
			  ○ Contribute to/support the Bring the Salmon Home Initiative.
			• Work with Ktunaxa Nation, including through direct engagement with KNC and Yaq̓it ʔa·knuqƛi ’it, to document and protect cultural heritage artifacts on their traditional territory.
			• Provide funding for cultural mapping studies for preservation and continued education about cultural practices and heritage.

Table I-1: Potential Project-Environment Interactions and Mitigations

Environment Component	Potential Project-Environment Interactions	Potential Cumulative Effects	Plausible Mitigations
			• Provide funding for community-driven studies which may include topics such as land use, recording oral histories, a cultural heritage study, traditional skills or others. • Update existing agreements such as the IMBA, or developing new agreements. • Provide additional opportunities to KNC and Yaq̓it ʔa·knuqƛi ’it to support Ktunaxa being Ktunaxa on the land (e.g., support for Culture Camps, on the land learning, Ktunaxa language program, support Ktunaxa annual harvests, tri-nation gathering, access support for confidence in land use). • Finalize a Cultural Management Plan which would provide support to EVR on means by which Ktunaxa cultural knowledge may be utilized within EVR operations, and outline ways EVR and Ktunaxa Nation, including KNC and Yaq̓it ʔa·knuqƛi ’it, can work together on cultural initiatives. • EVR understands that Ktunaxa is entitled to engage with the Crown in respect of its asserted right to ownership or control of resources. The lifespan of the Project and staging of mining will provide an opportunity to advance discussion with the Crown and, to the extent appropriate, with EVR under new or existing agreements. • Providing mentoring opportunities under Ktunaxa Nation technical staff, including through direct engagement with KNC and Yaq̓it ʔa·knuqƛi ’it, and EVR staff to build professional capacity. • Collaborate with KNC and Yaq̓it ʔa·knuqƛi ’it to identify culturally appropriate employment opportunities EVR can support for Ktunaxa community members that align with community values and recognize members’ qualifications and knowledge. • Provide support for educational and training opportunities related to long-term employment that meet the needs of Yaq̓it ʔa·knuqƛi ’it and other Ktunaxa First Nation community members and to provide skills for diverse roles beyond entry-level jobs. • Update benefits sharing agreement with KNC and Yaq̓it ʔa·knuqƛi ’it with enhancements to support training, employment and economic participation. • Provide financial support through IMBA, Interim Relationship Agreements and other means to support Ktunaxa community development priorities, including workforce development. • Create a mine development committee or designated forum with representation from KNC and Yaq̓it ʔa·knuqƛi ’it to discuss future development projects and opportunities. • Recognize and acknowledge Yaq̓it ʔa·knuqƛi ’it and other Ktunaxa First Nations and the traditional territory of Ktunaxa in product descriptions and in discussion with customers. • Support the development of a communication tool that shares Project updates, including the socio-economic benefits of the Project, environmental monitoring and work of the Cultural Working Group, with community members. • Collaboratively establish a monitoring program and culturally appropriate measures to evaluate mitigation effectiveness for discussion with KNC and Yaq̓it ʔa·knuqƛi ’it as an area of priority under the Joint Management Agreement.

a) Reference to aquatic resources includes fish and fish habitat as defined in subsection 2(1) of the *Fisheries Act*, aquatic species as defined under the *Species at Risk Act* (SARA), and aquatic habitats that may be used by migratory birds and species of conservation concern. It also includes other aquatic resources such as benthic invertebrates, amphibians and the aquatic habitat they rely on.