



# Tahltan Risk Assessment- Red Chris Block Cave Project Production Phase

**LANDS AND REGULATORY AFFAIRS  
DEPARTMENT**

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## **ACKNOWLEDGEMENTS**

The Tahltan Central Government acknowledges the contributions and efforts of the Lands & Regulatory Affairs Department in completing the Tahltan Risk Assessment for the Red Chris Block Cave Amendment. Specifically, the efforts of Lands & Regulatory Affairs Director Connor Pritty, THREAT Red Chris Project Manager Anna Osborne, Lands & Regulatory Affairs Senior Advisor Norm MacLean, Major Projects Coordinator Shawn Ducharme, Shared Engagement Record Coordinator Blaine Lindstrom, and Lands Administrative Assistant Roxanne Ball.

Tahltan Central Government acknowledges the collaboration with the EAO in the implementation and consensus seeking requirements of the Declaration Act Agreement and commends the EAO on their thoughtful and co-operative approach throughout this novel and challenging process.

Newmont Red Chris Mine Limited (NRCML) has been a supporter of the Declaration Act Agreement, providing open and transparent communication, sharing information with communities and members, responding to Tahltan information requests, and remaining flexible to changing circumstances throughout the assessment process.

The views, feedback, and directions provided by the Tahltan Elders Council have been very important to guide the review and development of the Tahltan Risk Assessment over the last several years.

Finally, the views, feedback, and directions provided by Tahltan members, including with respect to community wellbeing, cultural connections to the lands and water surrounding Red Chris Mine, employment and training, and the continued effects of resource development on Tahltan families and communities, were vital to ensuring a holistic Tahltan Risk Assessment and developing final recommended conditions to attach to a potential positive consent decision.

## DEFINITIONS

AAIR	Amendment Application Information Requirements
AOI	Areas of Interest
Amendment Application	NRCML's application for the Block Cave Amendment
Amendment Order	Order issued pursuant to s. 32(3) of the EA Act amending EAC M05-02 for the Red Chris Mine
Assessment Report	Written report setting out the EAO's assessment of the Block Cave Amendment
BC	Province of British Columbia
Block Cave	A method of underground hard rock mining that involves undermining an ore body, allowing it to progressively collapse under its own weight
Block Cave Amendment or Amendment	NRCML's proposed amendment to EAC M05-02 for the Red Chris Mine
Consent AOI	Consent Area Cumulative Effects AOI
CE	Cumulative Effects
Declaration Act Agreement	<i>Declaration Act Consent Decision-Making Agreement for Red Chris Porphyry Copper-Gold Mine Project</i>
DRIPA	<i>Declaration on the Rights of Indigenous Peoples Act, SBC 2019, c 44</i>
EA	Environmental Assessment
EA Act	<i>Environmental Assessment Act, SBC 2018, c 51</i>
EAC	Environmental Assessment Certificate
EAO	British Columbia Environmental Assessment Office
ECRP	Eskay Creek Revitalization Project
IBCA	Updated Impact-Benefit Co Management Agreement
IISD	International Institute for Sustainable Development
KSM	Kerr-Sulphurets-Mitchell
MASL	Metres Above Sea Level
LAA	Local Assessment Area
NRCML, or the Proponent	Newcrest Red Chris Mining Limited, a wholly owned subsidiary of Newmont Corporation
NTL	Northwest Transmission Line
RCMC	Red Chris Monitoring Committee

Red Chris Mine	Red Chris Porphyry Copper-Gold Mine
Rights and Title	Tahltan's Aboriginal rights, including Aboriginal title and self-governance right
TAC	Technical Advisory Committee established for the Block Cave Amendment under s. 21(1) of the EA Act
Tahltan Continuum	Tahltan's current, ongoing and future exercise of Tahltan's Rights and Title for all time, founded on Tahltan's historic use and occupation of Tahltan Territory since time immemorial
Tahltan Knowledge	Has the meaning set out in the Declaration Act Agreement
Tahltan Significance Factors	The factors set out at section 9.22 of the Tahltan Impact Assessment Policy
TAS	Tahltan Ancestral Study
TCG	Tahltan Central Government
TCG Board	The Board of Directors of TCG
TEK	Traditional Ecological Knowledge
THREAT	Tahltan Heritage Resources Environmental Assessment Team
TIA	Tailings Impoundment Area
TLUOS	Traditional Land Use and Occupancy Study
TNDC	Tahltan Nation Development Corporation
TRA	Tahltan Risk Assessment
TSP	Keep Our Trails Open: The Tahltan Stewardship Plan
WMAC	Wildlife Management Advisory Committee

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# 1 Purpose

## 1.1 GUIDE TO THIS REPORT

This document contains the entirety of the Tahltan Risk Assessment (TRA) Report for the proposed amendment to Environmental Assessment Certificate (EAC) #M05-02 for the Red Chris Block Cave Project—Production Phase (Block Cave Amendment). The Block Cave Amendment is proposed by Newcrest Red Chris Mining Limited (NRCML), a wholly owned subsidiary of Newmont Corporation. NRCML holds EAC #M05-02 and is the current operator of the Red Chris Porphyry Copper-Gold Mine (Red Chris Mine). The Red Chris Mine is already an operating mine and is located adjacent to the Tahltan community of Iskut in northwestern B.C.

The proposed Block Cave Amendment, which would convert the Red Chris Mine from open pit to Block Cave production, is considered a “substantial change” to the Red Chris Mine under the terms of the Declaration Act Consent Decision-Making Agreement for Red Chris Porphyry Copper-Gold Mine Project (Declaration Act Agreement), signed November 1, 2023, by the Province of British Columbia (BC) and the Tahltan Central Government (TCG), and witnessed by the Iskut Band and Tahltan Band.

It is important to recognize that neither the Tahltan Risk Assessment nor the Tahltan Risk Assessment Report are decisions about the Amendment or final terms and conditions for the Amendment to proceed. Rather, similar to the EAO’s Assessment Report, the Tahltan Risk Assessment delivers a review, recommended conditions, and conclusions to support the decision to be made by the TCG Board. The Tahltan Risk Assessment and the conclusions from this assessment will inform TCG’s decision-making in relation to the Amendment, along with the following information:

- (a) the EAO’s draft Assessment Report and draft Amendment Order;
- (b) any unresolved inconsistencies that remain between western knowledge and Tahltan Knowledge; and
- (c) any unresolved inconsistencies between conditions contained in the draft Amendment Order and any additional conditions considered necessary by the TCG Lands Director.

Through their review of the Tahltan Risk Assessment and the EAO’s assessment of the Block Cave Amendment, the TCG Board will consider the outcomes of engagement with Tahltan members about the Block Cave Amendment, and the results of engagement with NRCML about the Block Cave Amendment.

As per the Declaration Act Agreement, the materials presented in this TRA Report are to inform the TCG Board’s decision on whether to consent to the proposed Block Cave Amendment, and if so, whether any terms and conditions must be included in the order that amends EAC M05-02 (Amendment Order) for TCG to consent.

This report is divided into 10 sections. Brief descriptions of each section and hyperlinks are provided below to support navigation:

1. **Introduction (current page)**

2. **Overview of the Declaration Act Agreement:** Section 2 focuses on the requirements of the Declaration Act Agreement and sets the context and expectations for this TRA.

3. **Tahltan Risk Assessment Requirements:** Section 3 includes the Tahltan context for the TRA, including all guiding documents and describes Tahltan laws, knowledge, and perspectives guiding the TRA. Section 3.9 lays out the methodology for the TRA and contains definitions and criteria guiding the assessment undertaken in Section 9.

4. **Project Context and Amendment Proposal:** Section 4 describes the context of the Red Chris Mine as it currently operates, including its regulatory context and relationships with the Tahltan Nation and TCG. The proposed Block Cave Amendment is described in Section 4.2, with additional context to situate the project in 4.3.

5. **Results of Tahltan Engagement:** Section 5 describes the various approaches taken to ensure fulsome Tahltan member input into the scope and findings of this TRA.

6. **Results of Public Engagement:** Section 6 describes the approaches taken to consider input from the greater public to this TRA.

7. **Results of Consensus Seeking Between TCG and EAO:** Section 7 details the work TCG and BC did together throughout the TRA process and documents results of consensus seeking between BC and TCG as required by the Declaration Act Agreement.

8. **Results of Engagement with the Proponent:** Section 8 details how TCG and NRCML engaged throughout the EA and TRA process.

9. **Risk Assessment:** Section 9 contains the entirety of the TRA results, with Section 9.5 details recommend terms and conditions and Section 9.6 containing conclusions of the assessment undertaken.

10. **Risk Assessment Conclusions:** Section 10 shares overall conclusions of the TRA from the TCG Lands and Regulatory Affairs Director to inform the TCG Board Decision.

## 1.2 LIMITATIONS OF ASSESSMENT

The Tahltan Risk Assessment is the second of its kind for the Tahltan Nation, where proposed resource development is being reviewed by way of a Tahltan - led assessment, guided by Tahltan laws, stewardship principles, policies, land use directions, Tahltan Knowledge, and informed by western science. The Tahltan Risk Assessment is supporting the second-ever consent-based decision under DRIPA, where the TCG will decide whether to consent to the proposed Block Cave Amendment proceeding, and any terms and conditions that must be included in the Amendment Order.

This Tahltan Risk Assessment was developed in parallel to and concluded following the Eskay Creek Revitalization Project (ECRP) assessment, but unique attributes of both projects required tailored approaches. This Tahltan Risk Assessment relates to a proposed amendment to an EAC rather than to a new proposed project. TCG had to consider the existing effects of the operating Red Chris Mine and the existing collaborative management structures while respecting the scope of the proposed Block Cave Amendment.

Some additional challenges with this assessment are due to contemporary provincial EA policies and practices, such as those developed to meet requirements of the *Environmental Assessment Act*, that do not meet expectations of Tahltan, specifically the need to consider impacts holistically, cumulatively, and across multiple scales. Blending western EA practices with holistic and cumulative approaches that are reflective of the Tahltan perspective was a unique challenge and the Tahltan approach continues to evolve. Differing approaches and perspectives on impacts also influenced TCG's ability to reach consensus with the BC EAO.

It is important to recognize that neither the Tahltan Risk Assessment nor the Tahltan Risk Assessment Report are decisions about the Block Cave Amendment or final terms and conditions for the Block Cave Amendment. Rather, similar to the EAO's Assessment Report, the Tahltan Risk Assessment Report delivers a review, proposed conditions, and conclusions to support the decision to be made by the TCG Board. The Tahltan Risk Assessment Report and the conclusions from this assessment will inform TCG's decision-making in relation to the Block Cave Amendment, along with the other information listed above in section 1.1.

Along with their review of the Tahltan Risk Assessment Report and the EAO's assessment of the Block Cave Amendment, TCG's decision makers will consider the outcomes of engagement with Tahltan members about the Block Cave Amendment, and the results of engagement with NRCML.

As this is the second Tahltan Risk Assessment of its kind, it is expected that the format will likely evolve over time as more consent-based regulatory and Environmental Assessment reviews and decision-making processes are undertaken by Tahltan. The Tahltan Risk Assessment, Tahltan's Impact Assessment Policy, and consent-based decision-making processes will evolve as more such processes occur within the Nation, and the shared learnings from this assessment and the decision-making process it supports are included in future regulatory reviews.

## 2 Overview of the Declaration Act Agreement

### 2.1 OVERVIEW

#### 2.1.1 Context for Agreement

On November 1, 2023, TCG and BC signed the Declaration Act Agreement, a consent-based decision-making agreement under section 7(1)(b) of DRIPA.

The Declaration Act Agreement relates to proposed changes to the Red Chris Mine that TCG and BC agree have characteristics of a complex amendment (defined in the Declaration Act Agreement as a “Substantial Change” to the Red Chris Mine).<sup>1</sup>

Under the Declaration Act Agreement, the consent of TCG is required for a Substantial Change to the Red Chris Mine to proceed. The processes that TCG and BC will follow to assess potential effects from a proposed Substantial Change and decide whether it should go ahead are set out in the Declaration Act Agreement.

The Declaration Act Agreement represents a very important step towards the recognition and respect of Tahltan’s jurisdiction and decision-making authority when it comes to the use of land and resources in Tahltan Territory. The context for this recognition and respect, as described in the Declaration Act Agreement, includes:

- (a) Tahltan’s right of self-determination and decision-making authority in Tahltan Territory;
- (b) BC’s recognition of Tahltan’s Aboriginal Rights and Title throughout Tahltan Territory;
- (c) the 1910 Declaration of the Tahltan Tribe signed on October 18, 1910 and reaffirmed by Tahltan on its 100th anniversary on October 18, 2010 (1910 Declaration);
- (d) BC’s commitment to implementing the UN Declaration on the Rights of Indigenous Peoples; and
- (e) TCG and BC’s shared goals of advancing reconciliation and achieving coordinated decision making.

#### 2.1.2 Application of the Declaration Act Agreement to the Block Cave Amendment

Through the Block Cave Amendment, NRCML has applied to amend EAC M05-02 for the Red Chris Mine in a way that TCG and BC have agreed constitutes a Substantial Change under the Declaration Act Agreement.

NRCML’s application for the Block Cave Amendment (Amendment Application), submitted pursuant to section 32 of the provincial *Environmental Assessment Act* (EA Act), proposes to begin transitioning the Red Chris Mine from an open pit operation to an underground mining operation using Block Cave methods.

Under the terms of the Declaration Act Agreement, the Block Cave Amendment cannot go ahead without TCG’s consent. Following an assessment of the Block Cave Amendment by both TCG and the EAO (culminating in this report), the Board of Directors of TCG (TCG Board) will decide whether to provide TCG’s free, prior and informed consent to the Block Cave Amendment proceeding.

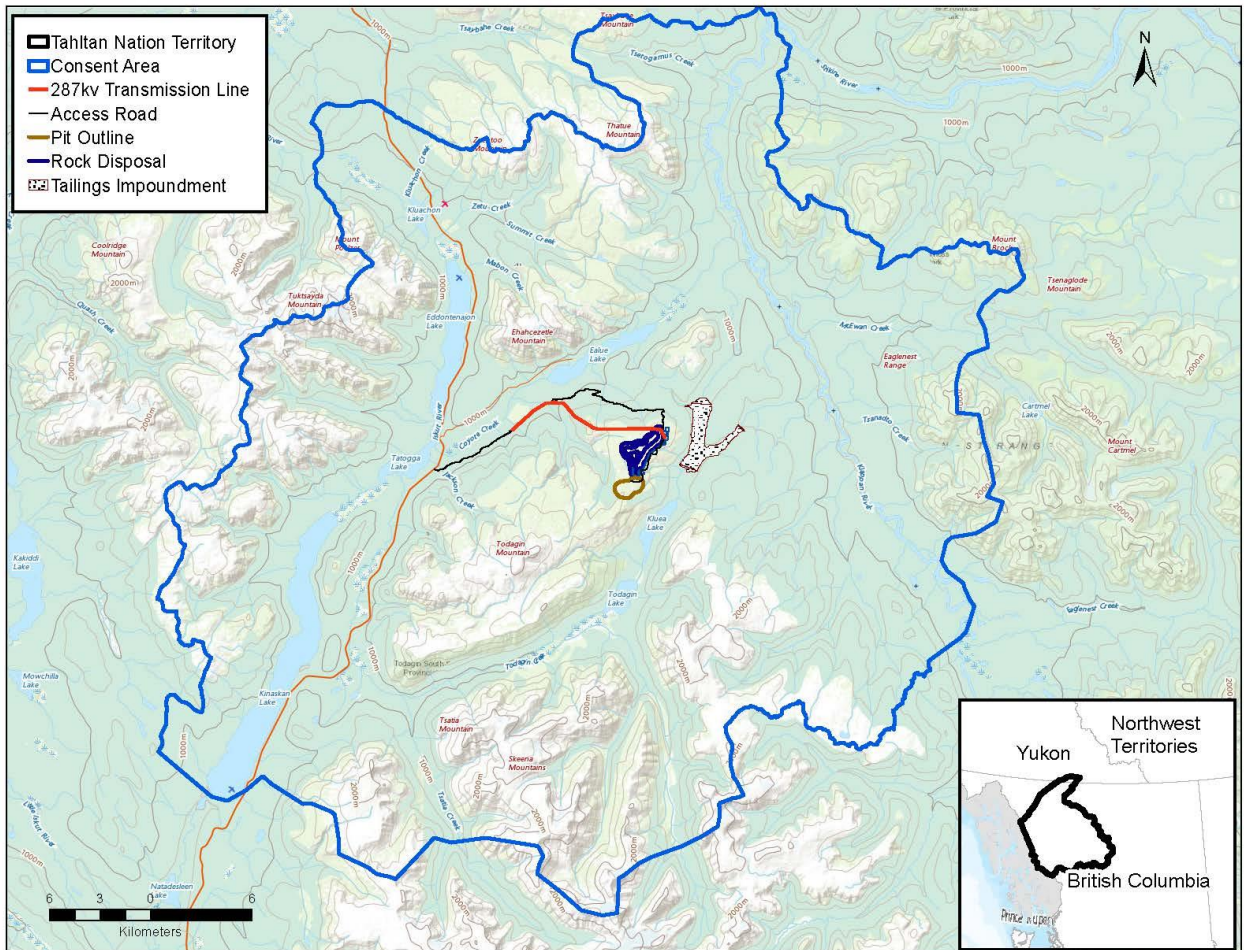
As well as being a decision maker for the Block Cave Amendment under the Declaration Act Agreement, TCG is also a participating Indigenous nation for the purposes of BC’s assessment as that term is defined in the EA Act. TCG’s technical representatives have participated in all aspects of the EAO’s environmental assessment (EA) process and results of that participation are included in BC’s Assessment Report and have informed this Tahltan Risk Assessment Report.

#### 2.1.3 Consent Area

The Declaration Act Agreement identifies the area within which Tahltan consent is required for a Substantial Change to the Red Chris Mine to proceed. This area, referred to as the “Consent Area”, is attached at Schedule B to the Declaration Act Agreement and is reproduced below.

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<sup>1</sup> The typical characteristics of complex amendments are identified in Table 1 of the Environmental Assessment Office’s [Environmental Assessment Certificate and Exemption Order Amendment Policy](#).



**Figure 1: Consent Area as per Declaration Act Agreement<sup>2</sup>**

The proposed Block Cave Amendment is located within the Consent Area.

The Declaration Act Agreement makes it clear that the Consent Area does not affect the scope of potential effects that will be considered in assessing a Substantial Change. In assessing the potential effects of a Substantial Change to the Red Chris Mine, BC has acknowledged TCG's interest in:

- (a) using local and regional assessment areas for assessments that will allow potential effects of a Substantial Change to be identified and considered;
- (b) considering the interactions between a Substantial Change and existing and potential future Substantial Changes; and
- (c) developing a cumulative effects methodology that will identify and consider cumulative effects relevant to a Substantial Change.

<sup>2</sup> Declaration Act Consent Decision-Making Agreement for Red Chris Porphyry Copper-Gold Mine Project between Tahltan Nation and Province of British Columbia signed November 1, 2023

## **2.2 TAHLTAN RISK ASSESSMENT AND EAO EFFECTS ASSESSMENT**

### **2.2.1 Tahltan Risk Assessment**

As set out in the Declaration Act Agreement, the TCG Board's decision whether to provide TCG's free, prior and informed consent to the Block Cave Amendment proceeding will be informed by the EAO's assessment as well as the assessment carried out by TCG. This assessment, the Tahltan Risk Assessment, has been completed and its conclusions are set out in this Tahltan Risk Assessment Report.

In order to provide clarity and transparency regarding the assessment and decision-making processes for proposed Substantial Changes to the Red Chris Mine, the Declaration Act Agreement sets out:

- (a) how TCG will conduct a Tahltan Risk Assessment and prepare a Tahltan Risk Assessment Report; and,
- (b) how the Tahltan Risk Assessment Report will ultimately be used to inform the TCG Board's decision whether to consent to a Substantial Change proceeding.

As set out in the Declaration Act Agreement, the Tahltan Risk Assessment requires TCG to apply Tahltan-specific information and assessment requirements to their review of a proposed Substantial Change, including:

- (a) TCG policies and guiding documents such as the 1910 Declaration, the Tahltan Resource Development Policy, and the Tahltan Impact Assessment Policy;
- (b) the Tahltan Risk Assessment Factors and the Tahltan Sustainability Requirements, as set out at Schedules C and D of the Declaration Act Agreement;
- (c) Tahltan information requirements including in relation to Tahltan Knowledge, Tahltan Values, and Tahltan scales of assessment and methodologies;
- (d) information and conclusions from TCG's assessment of impacts to Tahltan Aboriginal rights and title from the Substantial Change; and
- (e) input and information from Tahltan members.

The Declaration Act Agreement also requires TCG to consider the following in the Tahltan Risk Assessment for the Block Cave Amendment:

- (a) the information in the Amendment Application;
- (b) information from the Technical Advisory Committee (TAC);
- (c) the EAO's assessment of the Block Cave Amendment including the draft Assessment Report and any proposed terms and conditions to be included in the Amendment Order;
- (d) input from the public comment period; and,
- (e) the results of consensus-seeking efforts with the EAO on effects from the Block Cave Amendment.

### **2.2.2 EAO Effects Assessment**

As described in the Declaration Act Agreement, TCG and the EAO share a goal of coordinating their respective assessments of the Block Cave Amendment. As well as seeking to achieve consensus in relation to the informational and assessment requirements required to support both assessments, TCG and the EAO have sought to reach consensus in relation to effects from the Block Cave Amendment and the terms and conditions that must be included in the Amendment Order.

This coordination of assessments means that the EAO's assessment and the results of consensus seeking between the EAO and TCG is an important consideration in the Tahltan Risk Assessment.

In undertaking its assessment of the Block Cave Amendment, TCG understands that the EAO has considered:

- (a) the requirements of the EA Act and associated policies available on the EAO's website;
- (b) information in the Amendment Application;
- (c) information from the TAC;
- (d) Tahltan Knowledge;
- (e) TCG's assessment of the Block Cave Amendment, including the draft Tahltan Risk Assessment Report and any additional proposed terms and conditions identified by TCG;
- (f) information and conclusions from TCG's assessment of impacts to Tahltan Aboriginal rights and title from the Block Cave Amendment;
- (g) input from the public comment period and community engagement undertaken by TCG; and
- (h) the results of consensus-seeking efforts with TCG on effects from the Block Cave Amendment.

The EAO also committed through the Declaration Act Agreement to consider the views of Tahltan members throughout the provincial assessment of the Block Cave Amendment.

In preparing this Tahltan Risk Assessment Report, TCG has considered the EAO's assessment of the Block Cave Amendment and the results of consensus-seeking with the EAO about effects from the Block Cave Amendment.

### **2.2.3 Proponent Engagement**

TCG recognizes the importance of engaging with NRCML in carrying out the Tahltan Risk Assessment and preparing this Tahltan Risk Assessment Report. As described in the Declaration Act Agreement, TCG and the EAO share the goal of providing clarity for NRCML about our respective assessment and decision-making processes for the Block Cave Amendment.

The Declaration Act Agreement identifies opportunities for NRCML to be engaged in TCG and the EAO's assessments and decision-making processes for the Block Cave Amendment. These opportunities are aimed at ensuring that NRCML has a reasonable opportunity to:

- (a) provide information to inform the assessments and decision-making processes;
- (b) participate in the assessments as appropriate in order to support transparent processes that are consistent with the principles of administrative fairness;
- (c) discuss strategies with TCG and the EAO for mitigating effects from the Block Cave Amendment;
- (d) be informed of concerns that BC or TCG may have regarding the Block Cave Amendment; and
- (e) respond to concerns that BC or TCG may have regarding the Block Cave Amendment.

TCG has worked with the EAO to provide these engagement opportunities to NRCML and has appreciated the level of engagement provided by NRCML in relation to completing the Tahltan Risk Assessment and preparing this Tahltan Risk Assessment Report. For further detail related to TCG's engagement with NRCML throughout the Tahltan Risk Assessment, see Sections 8 (Results of Engagement with the Proponent) and 4.1.3.1 (The Tahltan-NRCML IBCA).

### **2.2.4 Tahltan Engagement**

The views and perspectives of Tahltan communities and members are central to TCG's assessment of the Block Cave Amendment. The Declaration Act Agreement identifies requirements related to Tahltan community engagement to ensure that the views and perspectives of Tahltan people are meaningfully incorporated into each stage of TCG's assessment and in the drafting and finalization of the Tahltan Risk Assessment.

TCG facilitated a range of opportunities for Tahltan members and communities to provide feedback, direction, and knowledge during each phase of the Tahltan Risk Assessment and the implementation of the Declaration Act Agreement. TCG delivered numerous engagement and information-sharing sessions to support their understanding of the views and perspectives of Tahltan communities and members about the Block Cave Amendment.

A summary of TCG's engagement with Tahltan membership and communities in relation to the Block Cave Amendment is set out in Section 3.1.4 and Section 5 of this document. The common themes that were raised during Tahltan community and member engagement included:

- Water and water management with concerns on tailings storage, water protection, seepage, downstream effects, including on the community of Iskut, and impacts on fish and aquatic ecosystems;
- Regional and community effects including pace and scale of development, existing and future community impacts;
- Cumulative effects in Tahltan Territory;
- Economics and benefits
- Tahltan culture, heritage, and way of life;
- Safety and concerns relating to underground block cave mining;
- Wildlife and wildlife habitat;
- Human health and air quality for people and communities;

- Quiet enjoyment of land and resources for current and future generations
- Transportation and highway safety;
- Socioeconomic legacies

The knowledge, feedback, concerns, and questions shared and raised during Tahltan membership and community engagement have supported the preparation of this Tahltan Risk Assessment Report and the assessment of potential effects on Tahltan Values. In addition, throughout key phases of the environmental assessment and implementation of the Declaration Act Agreement, Tahltan membership feedback and direction were instrumental in shaping the Tahltan information requirements under the AAIR, defining the Tahltan Risk Assessment AOI's boundaries, informing the review of the Application, and guiding the drafting of potential Tahltan conditions for inclusion in Section 9.5 of this Tahltan Risk Assessment.

### **2.2.5 Public Engagement**

The Declaration Act Agreement identifies collaborative processes to be carried out by TCG and the EAO in relation to planning, carrying out, and considering public engagement and input in relation to their respective assessments.

The steps carried out by TCG and EAO to hear from members of the public about the Block Cave Amendment are summarized in Section 6.

The results of this public engagement have been considered in the Tahltan Risk Assessment and the preparation of this Tahltan Risk Assessment Report.

### **2.2.6 Consensus Seeking Between EAO and TCG**

TCG and BC established a number of collaborative structures under the Declaration Act Agreement to help support their shared goal of coordinated assessments of Substantial Changes. The purpose of these structures has been to help TCG and the EAO in seeking to reach consensus in relation to their assessments.

The two main collaborative structures established under the Declaration Act Agreement are:

#### **(a) Collaboration Team:**

This team is comprised of the TCG Lands and Regulatory Affairs Director (TCG Lands Director) and the EAO Project Lead, along with any other individuals they designate to participate.

The Collaboration Team is responsible for working together to ensure that the requirements of the Declaration Act Agreement are met, that efforts are made to seek to reach consensus, that engagement occurs with NRCML, and that any unresolved issues or areas where they cannot reach consensus are referred to the Senior Officials Table as needed.

#### **(b) Senior Officials Table**

This is a leadership group comprised of the TCG President and Vice-President, the Chief of the Iskut Band, the Chief of the Tahltan Band, the TCG Lands Director, the Associate Deputy Minister of the EAO, and Deputy Ministers.

The Senior Officials Table is responsible for helping to implement the Declaration Act Agreement and to assist in resolving any issues or areas of non-consensus as needed.

TCG and the EAO have worked together through the Collaboration Team to try to reach consensus in relation to each stage of their assessments of the Block Cave Amendment.

These stages, as identified in the Declaration Act Agreement, are:

- Initiating the Assessments** - To decide if the Block Cave Amendment was ready to proceed to the assessments;
- Drafting the Amendment Procedures and the Amendment Application Information Requirements** - To determine how the assessment processes would proceed and what NRCML needed to include in the Amendment Application;
- Review of Amendment Application** - To decide whether the information presented in the Amendment Application was sufficient to inform the EAO Assessment and Tahltan Risk Assessment; and,

(d) **Assessments** - To prepare the Tahltan Risk Assessment Report and the EAO's Assessment Report.

Results of consensus seeking efforts between BC and TCG and any key areas of non-consensus are described in Section 7.

## **2.3 TCG AND BC DECISION MAKING**

### **2.3.1 Consent Requirement**

As set out above, TCG's consent is required for a Substantial Change to the Red Chris Mine to proceed. The TCG and EAO have agreed that the Block Cave Amendment constitutes a Substantial Change.

The decision whether to consent to the Block Cave Amendment will be made by the TCG Board on behalf of the Tahltan Nation. This is consistent with Tahltan's jurisdiction and decision-making authority when it comes to the use of land and resources in Tahltan Territory

To inform the TCG Board's decision whether to consent to the Block Cave Amendment, the TCG Lands Director will provide the TCG Board with the following materials and information:

- (a) this Tahltan Risk Assessment Report;
- (b) the EAO's draft Assessment Report, and draft Amendment Order;
- (c) any unresolved inconsistencies that remain between western knowledge and Tahltan Knowledge; and
- (d) any unresolved inconsistencies between the terms and conditions contained in the draft Amendment Order and any additional terms and conditions considered necessary by the TCG Lands Director.

The TCG Board will then decide whether to consent to the Block Cave Amendment. They will do so through a TCG Notice of Decision passed by resolution which will be provided to the EAO and NRCML.

### **2.3.2 Conditions**

The Declaration Act Agreement is clear that if TCG consents to the Block Cave Amendment, this consent may be contingent on certain terms and conditions being included in the Amendment Order. Tahltan's environmental and sustainability standards are high due to the stewardship responsibilities held by Tahltan in relation to the Territory, and terms and conditions are an important tool for being able to mitigate and address the potential impacts of the Block Cave Amendment.

The Declaration Act Agreement sets out a process for the EAO and TCG to work together to seek to reach consensus on the terms and conditions to be included in the Amendment Order. This process has involved engaging with NRCML on the proposed conditions as well as provincial permitting agencies.

Recommended terms and conditions from the Lands and Regulatory Affairs Department are listed in Section 9.5.

## **3 Tahltan Risk Assessment Requirements**

### **3.1 ROLES AND RESPONSIBILITIES**

#### **3.1.1 TCG Lands Department**

The TCG Lands and Regulatory Affairs Department (TCG Lands Department) has been responsible for carrying out the Tahltan Risk Assessment and preparing this Tahltan Risk Assessment Report.

The TCG Lands Director and department personnel have worked collaboratively with the EAO to carry out the Tahltan Risk Assessment, including by working with the EAO Project Lead through the Collaboration Team. Along with the EAO, the TCG Lands Department has carried out engagement with NRCML on behalf of TCG so that NRCML had the opportunity to participate in discussions relating to the draft Tahltan Risk Assessment Report, including any proposed terms and conditions to be included in the Amendment Order, to try to address any issues or concerns.

Other responsibilities of the TCG Lands Department have included seeking to address apparent inconsistencies between western knowledge and Tahltan Knowledge in relation to the assessments and seeking to achieve consensus with the EAO on this Tahltan Risk Assessment Report and the EAO's draft Assessment Report

(section 7.43 Declaration Act Agreement). This includes the draft recommendation on whether or not to issue the Amendment Order, and any proposed terms and conditions to be included in the Amendment Order.

### **3.1.2 EAO**

The EAO has been responsible for carrying out the provincial assessment of the Block Cave Amendment and preparing the draft Assessment Report, draft recommendation on whether or not to issue an Amendment Order, and proposed terms and conditions to be included in the Amendment Order.

The EAO Project Lead and their staff have worked collaboratively with TCG in carrying out the provincial assessment of the Block Cave Amendment, including by working with the TCG Lands Director through the Collaboration Team. Along with the TCG Lands Department, the EAO has carried out engagement with NRCML on behalf of BC so that NRCML had the opportunity to participate in discussions relating to the provincial assessment, including any proposed terms and conditions to be included in the Amendment Order, to try to address any issues or concerns.

Other responsibilities of the EAO have included: seeking to address apparent inconsistencies between western knowledge and Tahltan Knowledge in relation to the Tahltan Risk Assessment and the EAO's assessment; seeking to achieve consensus with the TCG Lands Department on this Tahltan Risk Assessment Report and the draft Assessment Report; and seeking consensus on draft recommendation on whether or not to issue an Amendment Order, and proposed terms and conditions to be included in the Amendment Order.

### **3.1.3 Collaboration Team**

Throughout the review of the Block Cave Amendment, the Collaboration Team has been responsible for working with TCG and BC officials to ensure that:

- (a) the requirements of the Declaration Act Agreement are met;
- (b) efforts have been made to reach consensus in relation to the Tahltan Risk Assessment and the EAO's assessment;
- (c) engagement has occurred with NRCML; and
- (d) any unresolved issues or areas where they could not reach consensus have been referred to the Senior Officials Table.

As required by the Declaration Act Agreement, this collaborative work has included:

- (a) meeting regularly;
- (b) preparing and maintaining a Work Plan
- (c) participating in meetings of the TAC;
- (d) seeking to achieve consensus in relation to the Tahltan Risk Assessment and the EAO's assessment;
- (e) creating and maintaining a Consensus Tracking Tool;
- (f) engaging with NRCML;
- (g) working to incorporate Tahltan Knowledge and Tahltan Values into the Tahltan Risk Assessment and the EAO's assessment;
- (h) carrying out and considering the results of public engagement and Tahltan community and member engagement; and
- (i) collaborating as necessary with the Ministry of Mining and Critical Minerals and Ministry of Environment in relation to the Block Cave Amendment and potential conditions.

To further support their collaborative review of the Block Cave Amendment, the EAO and the TCG also worked through the Collaboration Team to develop a detailed Issues Tracking Table that outlined:

- (a) the comments submitted by TCG and the EAO during the course of the various stages of the assessments;
- (b) NRCML's responses; and
- (c) the status on the resolution of issues that were raised.

TCG acknowledges the high level of commitment demonstrated by the EAO to working collaboratively on the assessments, including through the Collaboration Team and recognizes the efforts of NRCML in respecting the collaborative work as required by the Declaration Act Agreement and in positively contributing to inform and advance TCG and BC's assessments.

### 3.1.4 Tahltan Members

Throughout the Tahltan Risk Assessment and the EAO’s assessment, Tahltan communities and members have been provided with updates and information about the Block Cave Amendment, as well as opportunities to ask questions and provide input. Tahltan members have also been asked to provide Tahltan Knowledge relating to the assessment of potential effects from the Block Cave Amendment. See details and results of Tahltan engagement in Section 5.

TCG acknowledges the essential contributions made by Tahltan communities and members in reviewing the Block Cave Amendment, including sharing their knowledge and perspectives about potential effects and how they could be addressed.

In undertaking Tahltan membership and community engagement, TCG applied a variety of techniques to ensure that appropriate and accessible opportunities were available for Tahltan members to provide feedback, direction, and share knowledge to inform this Tahltan Risk Assessment. These engagement opportunities included the following:

- Formal Tahltan membership information sessions, including in-person presentations in Tahltan communities;
- Virtual Tahltan membership information sessions;
- Virtual and hard-copy Tahltan membership information packages;
- Elders’ luncheons;
- Annual General Assembly information booths and materials;
- Annual General Assembly membership information sessions;
- Tahltan community open houses;
- Family meetings coordinated through TCG Board member representatives;
- Virtual Block Cave Amendment-specific information websites; and
- Tahltan Elders and Elders Council information sessions

A summary of key activities during major phases of the environmental assessment and implementation of the Declaration Act Agreement is outlined in Table 1.

**Table 1: Tahltan community engagement activities and outcomes summary**

Declaration Act Agreement	Engagement Activity	Outcome
7.24	TCG, in collaboration with the NRCML, facilitated Tahltan engagement sessions from June 2023 to June 2024 to support the development of Process Order documents, including the Amendment Application Information Requirements, Tahltan Risk Assessment boundaries, and the collection of Tahltan Knowledge and Tahltan Values.	The outcomes of these membership engagements informed the finalization of the Tahltan Risk Assessment boundaries, the identification of Tahltan Values for inclusion in the Amendment Application Information Requirements, and application of Tahltan Knowledge to support the Amendment Procedures and Amendment Application Information Requires phase of the environmental assessment and consensus-seeking determinations.
7.28	TCG facilitated multiple Amendment Application Review phase sessions with Tahltan members to gather feedback on the Application submitted by NRCML. These sessions included participation from NRCML, where	During these engagement sessions and feedback opportunities on the Amendment Application, TCG received important feedback and direction from Tahltan members regarding

Declaration Act Agreement	Engagement Activity	Outcome
	<p>appropriate, to support transparency and provide technical clarity. To assist members in reviewing the Amendment Application, TCG and NRCML provided access to materials and information packages that could be taken home for further review. Members were encouraged to submit feedback through these take-home materials in addition to providing comments and questions directly during each engagement session. Members also had the opportunity to submit comments directly to the EAO during the Public Engagement Period during the Amendment Application Review period.</p>	<p>the Block Cave Amendment. This input directly informed Amendment Application acceptance decision issued by TCG and EAO on May 29, 2025.</p>
7.44	<p>TCG facilitated multiple engagement and information-sharing sessions with Tahltan members and communities on the draft Tahltan Risk Assessment Report, in which the draft Tahltan Risk Assessment Report, and the draft EAC proposed certificate conditions and the project description – were made available for Tahltan review and comment. These sessions were held collaboratively with NRCML, to ensure that NRCML could address concerns and interests raised by members and respond to clarifying questions related to the Block Cave Amendment.</p>	<p>During these engagements on the draft Tahltan Risk Assessment Report and the potential Amendment conditions, TCG sought feedback and direction from Tahltan members regarding the potential effects of the Amendment on Tahltan Values, the outcomes of the assessment, and the adequacy of the proposed certificate conditions. Input provided through discussions, comments, and written submissions helped further refine and amend both the potential Amendment conditions and the outcomes of the Tahltan Risk Assessment Report.</p>

### 3.1.5 TCG Board

Under the Declaration Act Agreement (Part 8 Decision-Making), the TCG Board will decide whether to provide TCG’s free, prior and informed consent to the Block Cave Amendment proceeding. They will also decide whether any additional terms and conditions must be included in the Amendment Order for TCG to consent to the Block Cave Amendment proceeding.

## 3.2 TCG POLICIES AND GUIDING DOCUMENTS

### 3.2.1 1910 Declaration

The 1910 Declaration confirms Tahltan sovereignty over Tahltan Territory. It was signed on October 18, 1910, by 83 members of Tahltan Nation, including Nanok, Chief of the Tahltans, Nastulta, also called Little Jackson, and George Assadza, Kenetl, also called Big Jackson. The Tahltan Declaration was re-affirmed by Tahltan Nation on its 100th anniversary (October 18, 2010). Through the 1910 Declaration, Tahltans declared sovereignty over all lands in Tahltan Territory. The Tahltans who had the foresight to make this declaration stand as role models of sovereignty to the people today, and these principles and values still hold; that only Tahltan speak for Tahltan (Tahltan Central Government and Province of British Columbia 2015)

The following excerpt from the 1910 Declaration is clear that Tahltan Territory has never been surrendered:

*“We, the undersigned members of the Tahltan tribe, speaking for ourselves, and our entire tribe... We claim the sovereign right to all the country of our tribe—this country of ours which we have held intact from the encroachments of other tribes, from time immemorial, at the cost of our own blood. We have done this because our lives depended on our country. We have never treated with them, nor given them any such title. (We have only very lately learned the British Columbia government makes this claim and that it has for long considered its property all the territories of the Indian tribes in B.C.)”*

The 1910 Declaration also demands that all “questions regarding our lands, hunting, fishing, etc., and every matter concerning our welfare, be settled....” This statement indicates that land and resource decisions in Tahltan Territory have to be based on Tahltan authorities, jurisdictions, laws, principles, and policies. This holds true today, where Tahltan leadership require decisions on land and resource use to be made in this manner.

The 1910 Declaration is identified in the Declaration Act Agreement as a TCG policy that will be considered by TCG in Tahltan Risk Assessments.

### **3.3 TAHLTAN RESOURCE DEVELOPMENT POLICY**

In 1987, Tahltan published the Tahltan Resource Development Policy to inform proponents and governments that Tahltans do not necessarily oppose economic opportunities and resource development. However, resource development must adhere to Tahltan principles to ensure the protection of rights and a sustainable way of life for the Tahltan Nation. The following are the principles approved by the Tahltan Tribal Council (now the TCG) and are still applicable today and provide guidance in how projects undergoing an environmental assessment are evaluated:

- 1) assurance that the development will not pose a threat of irreparable environmental damage;
- 2) assurance that the development will not jeopardize, prejudice or otherwise compromise the outstanding Tahltan aboriginal rights claim;
- 3) assurance that the project will provide more positive than negative social impacts on Tahltan people;
- 4) provision for the widest possible opportunity for education and direct employment-related training for Tahltan people in connection with the project;
- 5) provision for the widest possible opportunity for employment opportunities for Tahltan people with respect to all phases of the development;
- 6) provision for substantial equity participation by Tahltans in the total project;
- 7) provision for the widest possible development of Tahltan business opportunities over which the developer may have control or influence;
- 8) provision of the developer to assist the Tahltans to accomplish the objectives stated above by providing financial and managerial assistance and advice where deemed necessary.

The Tahltan Resource Development Policy is identified in the Declaration Act Agreement as a TCG policy that will be considered by TCG in Tahltan Risk Assessments.

### **3.4 TAHLTAN IMPACT ASSESSMENT POLICY**

The Tahltan Impact Assessment Policy was approved by the TCGs Board in November, 2022. It is a policy with the purpose of guiding Tahltan and providing information to the Crown, Crown Regulatory Agencies, and proponents in relation to:

- Tahltan’s implementation of Impact Assessments; and,
- Tahltan’s decision-making in relation to proposed projects in Tahltan Territory.

The policy provides clarity and direction on the types of Tahltan Knowledge and its application; Tahltan assessment requirements; related agreements to support impact assessments; Tahltan member engagement; roles and responsibilities; and Tahltan decision making in relation to projects.

The Tahltan Impact Assessment Policy is identified in the Declaration Act Agreement as a TCG policy that will be considered by TCG in Tahltan Risk Assessments.

### 3.5 KEEP OUR TRAILS OPEN: THE TAHLTAN STEWARDSHIP PLAN

The title of this document, Keep Our Trails Open, comes from a story told by a Tahltan outfitter, where his father who had started the guide and outfitting company, wrote a letter to his children to be opened when he died. “Keep our trails open!” were the instructions he left. For Tahltans, trails are not simply a way of getting from one place to another. They gather the country together into a living whole, like the arteries of a body. To walk the trails is to encounter and engage with the land and its great variety of inhabitants and its moods and seasons. The spirit of our ancestors and the spirit of the land talk to us. Much of our knowledge comes from these encounters along the way. The importance of “keeping our trails open” is not about assuring ease in getting around the bush. The real meaning touches upon what it is to be Tahltan: following the paths of our ancestors as they travel across the land. Keeping our trails open is a way of being with the land, along with our ancestors.

The authority for the Keep Our Trails Open: The Tahltan Stewardship Plan (TSP) is ultimately based on the relationship of all Tahltans to Keyeh. This word is usually translated as village or place, but it means much more than this. Keyeh also means home—our home—the unique place where as Tahltans we belong. Keyeh can encompass all the country now called Tahltan Territory, it can refer to Tahltan village on the Tūdeṣe chō (Stikine) River, which is the spiritual centre of the Tahltan homeland, or it can simply refer to a village. Keyeh includes the specific geographic and environmental characteristics of our country, just as it includes all of its residents, human and non-human (Higgins 1982). It is an interconnected whole made up of the relationships between humans, animals, spirits, mountains, waters and weather systems.

All Tahltans means not only the present generation, but our ancestors and all future generations. Land stewardship is the collective and inherent responsibility of all Tahltans. The TSP establishes the basis for future land use decisions. For this reason, it has the potential to shape future impacts to our Rights and Title more than any other decision we might take regarding a specific initiative. The management direction outlined in the TSP is intended to be faithful to our ancestors’ relationship to Keyeh, in this way ensuring that the land can support the ability of Tahltans to exercise our collectively-held Rights and Title for generations to come. The TSP covers the entire Territory of Tahltan Nation.

An old-time prospector once told a Tahltan Elder a story about the Mackenzie River. The waters of the Mackenzie are clear until they are joined by the muddy waters of the Liard River. But the two streams don’t immediately mix. For over 100 miles, the two powerful streams flow alongside one another, one clear and one muddy. As the Elder puts it, the “rivers walk side by side”. The Stewardship Plan acknowledges that Tahltans walk in two worlds, one passed down to us from our ancestors, connected to the land and stories about the land, and the other represented by Highway 37, which passes through our Territory, bringing industry, tourism, jobs, and the pressures and conveniences associated with contemporary life. Both of these worlds bring ways of seeing and acting, and both are necessary to ensure the sustainable stewardship of our Tahltan Territory.

But these two worlds are different and should not be confused. The TSP outlines how Tahltans intend to employ the best of both worlds in stewarding the land and preserving it for our children and their children and all future generations. However, as the Elder points out, while the separate streams of the Liard and the Mackenzie flow side by side for over 100 miles, in the end the Mackenzie becomes a muddy river like the Liard, which is fed in part by streams that begin in Tahltan country. In other words, the core principles that guide the Tahltan way of living with and caring for our world (called stewardship today) come from our ancestors.

Our teachings are passed down through stories. For that reason, the TSP contains many stories. Often, these stories are connected with the land and describe a way of thinking rooted in the land. A Tahltan Elder asked one of his Elders, how long it takes to solve a difficult question. He thought for a long time before answering. “About as long as it takes to walk from Tahltan to Telegraph and back.” Roughly 40 km—a long day’s walk. Walking and thinking go hand in hand: time is measured in steps across the land and problems are resolved as the landscape unfolds.

The purpose of the TSP is as follows:

- Establish that this is Tahltan’s plan, and Tahltan wants everyone to see it through their eyes and through their spirit;
- Provide a plan based on Tahltan stewardship requirements and Tahltan Knowledge that supports Tahltan land governance by establishing approved management directions;
- Ensure that planning priorities are focused on (a) the health of the land (including the earth, air, water and all living things and spirits that inhabit the land) and (b) the continuation of the Tahltan way of life;
- Support Tahltan cultural revitalization and strengthen connections between Tahltans and the land;
- Identify allowable uses of the land and our expectations for others when they use Tahltan land;

- Support existing Tahltan environmental assessment approaches to proposed developments in Tahltan Territory; and
- Provide a basis for collaborative management of resources, acknowledging that governance is grounded in Tahltan ways of being, that engagement with Elders and community is critical for the success of land use planning, and that the TSP will inform any future land use plans and decision-making agreements with other governments and proponents.

The TSP provides the land use management directions to be evaluated with Tahltan Core Priorities in the TRA as identified in the Tahltan Risk Assessment Factors (Schedule C of the Declaration Act Agreement) and future land uses supporting Tahltan Sustainability Requirements (Schedule D of the Declaration Act Agreement). The TSP is an endorsed Tahltan plan with the management directions being applied in the Tahltan Risk Assessment (A public TSP will be available sometime in 2026). The directions in the TSP provide additional support and directions for the Tahltan Risk Assessment, as part of the Tahltan Risk Assessment Factors and Tahltan Sustainability Requirements. To assist in advancing Tahltan Risk Assessment information, a limited redacted copy of the plan was shared with NRCML during the Application Review phase and prior to public release. The TSP identifies Special and Protected planning areas, management directions, and allowable land uses for the Areas of Interest identified for the Tahltan Risk Assessment (9.1.4). The TSP management directions were evaluated within the approaches identified in the Amendment Application Information Requirements (AAIR) and TSP management directions and analysis of alignment with the Amendment was shared with NRCML during reviews of the Draft TRA.

### **3.6 KEY TAHLTAN LAWS, CONCEPTS, AND PRINCIPLES (THE TAHLTAN PERSPECTIVE)**

As identified in section 4.1.1 of the AAIR, Tahltan laws, concepts and stewardship principles are information requirements to be met in the Amendment Application and are components of the TRA supporting the Tahltan Risk Assessment Factors and Tahltan Sustainability Requirements.

The Tahltan Risk Assessment is guided by Tahltan Knowledge and worldview and governed by the fundamental Tahltan policies and guiding documents, described above. All of these documents are developed as per the Tahltan Stewardship Principles. Tahltan stewardship principles reflect aspects of Tahltan Dula (“law”) and Dena Ah Nezen (“code of conduct”). These principles underpin the Tahltan Risk Assessment and provide a framework from which to consider potential impacts from the Block Cave Amendment. Further information on the Tahltan stewardship principles is summarized in the Declaration Act Agreement (section 7.4) where they are described as the interconnected key principles that TCG will apply in the Tahltan Risk Assessment, the Tahltan Impact Assessment Policy (section 9.2), the Red Chris Tahltan Land Use and Occupancy Study, (Jones et. al 2021), and the TSP.

#### **3.6.1 Tahltan Law, Stewardship, and Sustainability**

Sustainability and stewardship are difficult and complex terms that are used frequently in the context of lands and natural resource management, development and planning processes.

The word Tahltans use to describe our relationship to the land is Keyeh. This word is usually translated as village or place, but it means much more than this. Keyeh means home – our home – the unique place where we as Tahltans belong. Keyeh can encompass all the country now called Tahltan Territory, it can refer to Tahltan Village on the Tūdeṣe chō (Stikine) River, which is the spiritual centre of the Tahltan homeland, or it can simply refer to a village. Keyeh includes the specific geographic and environmental characteristics of our country, just as it includes all of its residents, human and non-human (Higgins 1982). It is an interconnected whole made up of the relationships between humans, animals, spirits, mountains, waters and weather systems. This whole has a cultural and spiritual meaning – the place that is home for us. As such, Tahltan Territory must be understood in its entirety, that is, as Tahltan’s home.

Keyeh is a central reality within our Tahltan worldview, and our understanding of ownership is connected to this reality. There can be no ownership of land without the existence of a personal relationship to it. Ownership means belonging. The land belongs to Tahltans because Tahltan belong to the land. Our stewardship practices are based on our relationship to Keyeh. In maintaining a right relationship with our land, salmon, wildlife, forests, rivers, we apply the Tahltan Knowledge we have acquired over thousands of years, passed down from generation to generation. Everything begins with relationship, if the relationship with Keyeh is damaged, distorted or diminished, then good stewardship cannot be practiced.

The following five stewardship principles – Dahts’eni (Kinship), Respect, Sharing, Ahī, and Kotah (Visiting) reflect aspects of Tahltan Dula (“law”) and Dena Ah Nezen (“code of conduct”). They are fundamental to our way of life and have guided our actions for generations, helping to define the kind of relationship to Keyeh that

is needed if we are to remain good caretakers of the land. These stewardship principles were included in section 4.1.2 of the AAIR and are described below.

### **3.6.1.1 Dahts'eni (Kinship)**

Humans and animals are relatives: we share a common origin. There is kinship between all things. This understanding is fundamental to our worldview. We do not regard ourselves as separate from the natural world.

As Tahltans, we think of the land as Keyeh in terms of cycles, shorter seasonal cycles and longer ecological cycles, and we have always understood that we need to live within those cycles by making our activities mimic them as much as possible. On the other hand, we accept that we will never fully understand the land—the larger community of which we are only a small part. This means that we need to be humble and careful and never forget that we always have more to learn. This can happen, for instance, by focussing too much on one part of the land, forgetting that we need to view the land as a whole of interdependent parts that are in dynamic and constantly shifting relationships with one another. For this reason, it is not acceptable to make trade-offs; accepting damage to one area because we have taken care of another area. The land is not divided up in this way. By disrupting the relationships between parts, in ways that we do not understand, we can upset the land's balance and bring about unanticipated consequences. We know that we are dependent on the generosity of Netce'nsta (Earth Mother), and as a result, we have an obligation to treat her and all her children with the utmost respect and reverence. If we damage the land, we damage our relationship to the land, and so we damage ourselves. In practising stewardship, the Tahltan way means that we acknowledge our kinship with our mother, Netce'nsta. We do not own the land; we belong to the land.

### **3.6.1.2 Edanosdih (Respect)**

Relations between kin should be based on respect. We believe that respect is owed not only to other members of the human community, but to other animals, the spirits of the land, rivers, mountains, and forests. Human beings are only a small part of this much larger interconnected and interdependent community. We show our respect in many ways, big and small.

Respect means treating the land with reverence, not foolishly or with contempt. Netce'nsta, the mother of us all, is a living being. She can look after herself and does not need us. Stewardship for us is not about “managing” the land, but learning how to shape our human actions and manage humans so that we can live with the land.

The principle of respect speaks to another important aspect of Tahltan stewardship: the need to remember “those with no voice” and ensure that their interests are heard and respected as well. Those with no voice include salmon and sheep, rivers and mountains, forests and grasslands, the spirits of the land, and the voices of those that have passed or are still to come: our ancestors and future generations. From our perspective, “those with no voice” do have voices but they are voices that are often ignored because people are not listening or do not want to listen. We must tailor our management to the needs of the land, understanding that different areas have different needs, and we can only do this by listening carefully.

### **3.6.1.3 Na'ašidih (Sharing)**

Within our worldview, the practice of sharing points to the deeper reality of interconnectedness or kinship; giving and receiving are the way all things relate to one another. Sharing as a social practice reflects an understanding of this reciprocity. The Earth gives water to us in the way a mother gives milk. In return, we accept our responsibility as caretakers and stewards of the land.

The practice of sharing acknowledges that the land is not something that can be owned by any one individual or group of people (except in a merely technical and legal sense). The land is a gift that is shared by all: humans and animals; rocks and rivers; past, present, and future generations. Stewardship requires us to balance the needs of all things that share the land. We must work together to reduce the negative impacts on the land, at the same time acknowledging our need for minerals and fibre to sustain our present way of life. We must balance the needs of the present generation with the needs of future generations.

The social practice of sharing, which connects us to Keyeh and supports us in our role as stewards, is most easily taught and maintained in our culture through activities associated with being on the land. This means we must prioritize ensuring that we can continue to live our way of life, sustain harvesting patterns of game and salmon, berries and medicinal plants, and carry out our cultural and spiritual practices.

### **3.6.1.4 Ahī**

Ahī is one of our sacred laws and defines a fundamental aspect of our relationship to land and culture. Just as sharing represents good reciprocity, ahī points to the consequences of bad reciprocity. Ahī describes both a

type of action and the negative consequences of this action. Actions characterized as *ah̄* might violate ethical principles, such as the requirement to share, or they might involve a failure to observe specific protocols or ritual practices. At the most fundamental level, *ah̄* is what happens when the sacred order of things is broken—when an individual demonstrates through actions a refusal to acknowledge the kinship between all things.

*Ah̄* reminds us that when we are not in right relationship to the land, negative consequences will inevitably follow. We cannot escape the reciprocal nature of the relations between all things. It is simply a matter of choosing good reciprocity or bad reciprocity.

### **3.6.1.5 Kotah (Visiting)**

For us, ‘visiting’ is how we concretely enact the principles of kinship, respect and sharing. The reality of our kinship with *Keyeh*—our belonging to the land—is both something given and something that needs to be maintained, as it is with family ties. The way in which it is maintained is by travelling through the land, slowly, being part of it and calling it by name: in other words, visiting the land.

Visiting is central to Tahltan stewardship. There can be no stewardship without an understanding of what is happening on the land. A lack of adequate information is a significant source of failure. Information requires people on the land who know the land, who appreciate what they see and listen to what the land has to say. Put simply, it requires visiting: people returning to the land again and again, giving it time, attention and consideration.

Visiting can also take the form today of meeting and developing relationships with non-Tahltan who play a role in resource management in Tahltan Territory. Tahltan do not live in isolation and we require strong relationships with other governments and industry to flourish in today’s society. We are willing to work with others who are respectful of our principles and our ways of doing things.

Visiting is also the means by which to maintain Tahltan’s oral history and culture. Stories are the principal means through which our knowledge is exchanged, refined, adapted, corrected, built upon, and passed down from generation to generation. Our knowledge is not something static and it cannot be fixed for all time in written words; our knowledge is relational, it is generated through relationships, and these change over time. In a story-telling culture like ours, the telling of stories is as important as the stories themselves.

### **3.6.2 Stewardship Vision and Tahltan Continuum**

The Tahltan view of stewardship arises from understanding the relationship Tahltan have to *Keyeh*. Belonging to the land means there is a reciprocal relationship between us and the land. A Tahltan Elder, says, “If we take care of the land, the land will take care of us.” Tahltan recognize that everything has a spirit and we have taken care of the spirit of everything on the land as our way of living with the land. Our land stewardship has a physical and spiritual oneness in which we and the land are as one, where there is not separation between us and the land and all that dwells on the land. Stewardship is not only about looking after certain features of the land (for example, *dēk’āne* (salmon) habitat, *hodzih* (caribou) migratory routes, soil quality, heritage sites, and so forth), but requires attention to the relationships between these features. *Keyeh* is an interconnected whole made up of reciprocal relationships, which the human community is part of.

This means that adverse impacts to the land change the relationships that Tahltan have with the land. Tahltan identity, cultural integrity, community cohesion and individual well-being are connected to the health of the land. Tahltan stewardship means maintaining good relationships to the land (and by “land” we always mean the entirety of land, including all things, spirits, waters and mountains, and the physical and spiritual relationships between them), across space and through time. A Tahltan Elder sums up what this means when they said, “The bottom line is that the land must be treated with respect. If you do not respect the land, it will kill you – the health of our land is our number one priority. How you respect the land shapes how you are respected as a person and how you are respected by *Ahdigi dene ti’e* [Tahltan’s Creator] throughout your life.” This means honouring our ancestors that came before us and caring for the generations that will come after so they may follow the paths of our ancestors engrained across *Keyeh*. We call this the Tahltan Continuum (Tahltan Central Government and Province of British Columbia 2015).

Tahltan stewardship is founded on the permanent and indelible connection of Tahltan people with the land from time immemorial to the everlasting future. Therefore, Tahltan must consider proposed projects across an extended time scale, termed the “Tahltan Continuum” (Figure 2).



**Figure 2: Tahltan Continuum<sup>3</sup>**

In order for the Tahltan Risk Assessment to adequately consider the proposed Block Cave Amendment across Keyeh and Tahltan’s relationship to Keyeh, the Amendment Application and this TRA consider conditions across the Red Chris Mine site specific, landscape, and regional scales, back casting from ancient time, through to present day and forecasting to the future. The TRA considers site specific, landscape and regional scale effects and contexts, applying all information available to forecast future barriers and conditions for generations yet to come.

This approach applies a holistic analysis of past and current conditions, the establishment of barriers and their effects across time. In viewing barriers and conditions across this context, it creates an understanding of the ancient (7-15 generations), historical (up to 7 generations), and present environmental setting and human footprint with an understanding of Tahltan way of life and its fulfillment. The approach allows to forecast future conditions—including up to 7 or more generations into the future. This includes the sensory, familial, social, and visual elements, as well as the impact of the non-Tahltan human footprint, which can aid in assessing past conditions and the relation to current conditions and necessary requirements for future conditions.

### **3.6.3 Tahltan Core Priorities**

The Tahltan Core Priorities for major projects are an integral part of the multi-layered approach and application of Tahltan Stewardship Principles and Tahltan worldview under the Tahltan Risk Assessment. The Tahltan Core Priorities were described at section 4.1.5 of the AAIR. The major project Tahltan Core Priorities are presented in Figure 3.

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<sup>3</sup> Graphic from N. Morin



**Figure 3: Tahltan Major Project Core Priorities**

The Tahltan Core Priorities are described further below.

**Priority 1.** Maintaining the long-term health of the land (including all of its terrestrial and aquatic ecosystems) is a mandatory condition for any kind of land use in all areas within Keyeh.

**Priority 2.** The land must be able to continue supporting our Tahltan way of life while meeting the “health of the land” condition established under priority 1. Tahltan way of life includes maintaining our personal connection with Keyeh and with each other, being able to live off the land, sustaining our harvesting and hunting patterns, engaging in our cultural and spiritual practices on the land and in our communities, enjoying the health benefits of being on the land and engaging in cultural practices, while also earning a reliable living.

**Priority 3.** Tahltan rights and title must be protected, upheld and continue to be exercisable for current and future generations.

**Priority 4.** Land that has been impacted or degraded through industrial use must be healed, through reclamation, restoration, and ritual ceremony to support priorities 1, 2, and 3.

#### **3.6.4 Tahltan Risk Assessment Factors and Tahltan Sustainability Requirements**

The Tahltan Risk Assessment Factors and the Tahltan Sustainability Requirements, as set out in Schedule C and Schedule D of the Declaration Act Agreement, are applied by TCG in assessing the Block Cave Amendment’s overall sustainability during the Tahltan Risk Assessment. The Tahltan Risk Assessment Factors provide the factors which the Block Cave Amendment is considered against to assess alignment with the Tahltan Sustainability Requirements. 3.9 The outcomes of TCG’s consideration of the Tahltan Risk Assessment Factors and Tahltan Sustainability Requirements for the Block Cave Amendment are set out in Section 9.4 of this Report.

## 3.7 TAHLTAN KNOWLEDGE

### 3.7.1 Tahltan Knowledge

As reported in the Klappan Strategic Initiatives (2015), *“Tahltan oral data provides a link to the voices of our ancestors; voices which have provided valuable and insightful knowledge of our sophisticated past. Our knowledge showed that Tahltans extensively used every inch of our territory, every resource provided by the land and that we did so with the utmost connection and respect for the land. Tahltan territory encompasses rugged wilderness; forests, mountains, canyons, glaciers and rushing rivers. Tahltan people inherited the skills to thrive in these landscapes, including the abilities to engineer and build bridges across steep and dangerous canyons. This land and these resources have shaped Tahltans and provided us with a high-quality life.”*

Tahltan Knowledge is defined in the Declaration Act Agreement.:

The importance of collecting and applying Tahltan Knowledge as part of the Tahltan Risk Assessment is identified in the Declaration Act Agreement and the AAIR. Application of Tahltan Knowledge requires being grounded in the fundamental value of oneness or interconnectedness of all things, requiring a holistic perspective. One must understand Tahltan Knowledge cumulatively and at site specific, landscape, regional, and territorial scales across time. Recognition of ahT means that long-term future consequences have to be taken into account. Interpretation of Tahltan Knowledge to inform the Tahltan Risk Assessment has been undertaken exclusively by the TCG. TCG worked with NRCML to ensure that any confidential Tahltan Knowledge that materially impacted the Tahltan Risk Assessment conclusions was shared with NRCML in sufficient detail so as to support understanding of how it affected conclusions in this Tahltan Risk Assessment Report.

#### 3.7.1.1 Tahltan Ancestral Study

Tahltan Knowledge is both spatial and non-spatial with linkages between knowledge sources. It provides strong information on ecological themes within ancient, historic, current and future settings.

As identified in section 4.1.4.1 of the AAIR, the Tahltan Ancestral Study (TAS) is a study based on map-based interviews with Tahltan elders carried out over a number of years, beginning in the early 1980s and is confidential. Tahltan Knowledge Agreements, with legal protections on its use and ownership, are required by all parties to be able to access Tahltan information and Knowledge. The information contained within these interviews is stored in a geographical information system database, supplemented with data from an ethnographical/historical literature review.

TAS information was used to form the basis of the approach to identifying Tahltan Values and Areas of Interest (AOIs) identified in section 9.1.2 for the Tahltan Risk Assessment. Tahltan Knowledge is sensitive and confidential and is not part of the public domain, like the Amendment Application. TCG, through a Tahltan Knowledge Protocol Agreement with NRCML, agreed to develop a Tahltan Land Use and Occupancy Study (TLUOS) for the Block Cave Amendment which was provided to NRCML in 2021 (Jones et al, 2021). As identified in section 4.1.4.2 of the AAIR, the TLUOS provides confidential and sensitive Tahltan information, in and around the Red Chris Mine. It was developed from Tahltan Knowledge digital information, maps from interviews, community engagement, Indigenous oral histories, ethnographic monographs and field notes, historical documents and archaeological reports. The TLUOS provides evidence of Tahltan use of the region from ancient times up to the date of the report and will be used to assist in the further gathering of Tahltan Knowledge. The report is not part of the public domain as it contains sensitive Tahltan Knowledge. It has been provided to NRCML and comprises a component of Tahltan Knowledge being applied in the Tahltan Risk Assessment.

#### 3.7.1.2 Tahltan Ecological Knowledge

Tahltan Knowledge is both spatial and non-spatial with linkages between knowledge sources. It provides strong information on ecological themes within ancient, historic, current and future settings.

As identified in section 4.1.4.3 of the AAIR, the Tahltan Ancestral Study is most frequently used by TCG to provide ecological information when assessing operational, strategic, and regional land and resource matters such as impact assessments, referrals, or land use plans. Tahltan Ancestral Study ecological themes can be modified into Tahltan surrogates (e.g., Tahltan Wildlife Habitat Mapping). This information can be used with governments, proponents, and public to provide land use directions but without sharing any sensitive information. Tahltan Knowledge on ecological themes comprises another component of Tahltan Knowledge being applied in the Tahltan Risk Assessment.

### **3.7.1.3 Archaeology**

Archaeological sites provide physical, on-the-ground evidence for land use and occupation and time depth. As such, they are an important part of Tahltan Knowledge as set out in section 4.1.4.4 of the AAIR.

The B.C. Archaeology and Yukon Heritage Branches maintain databases of archaeology sites and archaeologists working under permit must register all identified archaeology sites with these branches. However, most archaeological sites are unrecorded as only a fraction of the Tahltan Territory has been surveyed under permit.

In addition to provincial and territorial requirements, the TCG developed the Tahltan Archaeological Standards (May 2022) that provide guidance around appropriate recording, protection, and operating procedures for conduct of archaeological work in Tahltan Territory to protect the archaeological record for current and future generations.

Archaeological evidence can have significant time and depth and provide additional physical evidence of Tahltan land uses and occupancy for the past generations over the Tahltan Continuum. Tahltan Knowledge relating to archaeology comprises another component of Tahltan Knowledge being applied in the Tahltan Risk Assessment.

## **3.8 AMENDMENT APPLICATION INFORMATION REQUIREMENTS AND THE NRCML APPLICATION**

Pursuant to the EA Act and the Declaration Act Agreement, NRCML received guidance on the required contents of the Amendment Application through the BC-TCG issued AAIR. The final AAIR was issued by TCG and BC to NRCML on November 19, 2024. TCG authored Section 4 of the AAIR, containing guidance to NRCML on what information was required to be submitted to inform the Tahltan Risk Assessment. Section 4 also contained background and guidance on Tahltan Laws and Stewardship Principles, Tahltan Knowledge, the Tahltan Core Priorities, Areas of Interest, and Values to support NRCML's approach to drafting Section 4 of their Amendment Application. Additionally, as a participating Indigenous nation in the provincial assessment, TCG reviewed and contributed to all other sections of the AAIR to ensure the technical and information requirements for the Tahltan Risk Assessment would be met.

NRCML submitted their full Amendment Application for review on December 13, 2024. Following initial review of the Amendment Application, THREAT identified that Chapter 4 did not fully meet TCG expectations as laid out in section 4 of the AAIR. However, recognizing the need for collaboration to support a fully-realized Chapter 4, Tahltan and NRCML worked together to add to and refine Chapter 4 while review advanced on the remainder of the Amendment Application. Final versions of Chapter 4 were formally submitted by NRCML to the EAO and TCG on May 23, 2025.

As per Section 7.29 of the Declaration Act Agreement, TCG and EAO worked to confirm the adequacy of the Amendment Application as compared to the requirements of the AAIR. Adequacy of the final Chapter 4 was considered, along with all supplemental memos, Newmont responses to questions posted by TCG reviewers and the TAC, and a memo on the status of the Site-Wide Human Health Risk Assessment (HHRA) and detailed Health Impact Assessment (HIA). TCG and EAO reached consensus on adequacy and issued the decision to move to the EAO Effects Assessment and Tahltan Risk Assessment stages of the assessments on May 29, 2025.

## **3.9 METHODOLOGY**

Tahltan's impact assessment methodology for the Block Cave Amendment is generally described below in Section 3.9.1, with definitions and supporting information provided in Section 3.9.2.

### **3.9.1 TRA Methodology Overview**

The six steps of the methodology used to conduct the Tahltan Risk Assessment for the Block Cave Amendment were developed to meet requirements of the Declaration Act Agreement and the Tahltan Impact Assessment Policy. The methodology further attempts to balance expectations of contemporary environmental assessment practice that is based in values assessment with expectations of a holistic, interconnected assessment based on Tahltan worldview. To accomplish this, TCG employed a six-step process, described below and in Figure 4. Figure 5 is a summary of the six steps used throughout Section 9 to track progress as the methodology is applied.

As illustrated in Figure 4, the TRA Methodology follows 6 steps:

- Step 1: Establishes the existing conditions of AOIs and Tahltan Values across the Tahltan Continuum. Trends from ancient to future are described in the absence of the proposed Block Cave Amendment, and trends are summarized per AOI for each Tahltan Core Priority.
- Step 2: Confirms the expected effects of the proposed Block Cave Amendment. Expected effects are extracted from the Application, but are added to or modified based on the THREAT reviews and concerns voiced from the community.
- Step 3: Severity of effects is considered by assessing effects by two different means: (1) Effects identified in Step 2 are characterized using Tahltan Significance Factors (which are the criteria set out at section 9.22 of the Tahltan Impact Assessment Policy) as criteria; and (2) Effects to Tahltan Core Priorities, per AOI, are considered in the event the Block Cave Amendment progresses.
- Step 4: Given the information presented in Steps 1 to 3, effects of the Block Cave Amendment are considered against Tahltan Risk Assessment Factors and Sustainability Criteria. Where Risk Assessment Factors or Sustainability Criteria are not met, an effect is considered potentially significant.
- Step 5: Where potentially significant effects are identified in Step 4, terms and conditions recommended to address these effects are listed in Step 5.
- Step 6: Significance of the effects of the Block Cave Amendment are considered after application of the recommended terms and conditions from Step 5 to inform final conclusions.

To consider the specific requirements of assessing the Block Cave Amendment, the methodology was tailored to:

- Align with the processes set out in the Declaration Act Agreement, including informing TCG's consideration of the Tahltan Risk Assessment Factors and Tahltan Sustainability Criteria and identifying any significant residual effects and/or cumulative effects to Tahltan Values (see Section 7.39 of the Declaration Act Agreement).
- Align with Tahltan Laws and Stewardship Principles (see Section 3.6), including incorporating the concepts of the Tahltan Continuum, interconnectedness, and respect.
- Consider the information presented in the Amendment Application including Chapter 4, and subsequent supplementary information provided by NRCML in response to information requests, and outcomes of the NRCML- authored Human Health Risk Assessment (HHRA; NRCML 2025b) and Detailed Health Impact Assessment (HIA; NRCML 2025a).
- Consider the separate studies conducted to inform the Amendment Application and the TRA, including: the TLUOS (Jones et al. 2021) and the Socio-Economic Baseline Study (NRCML, 2024b);
- Address and incorporate community perspectives as gathered through Tahltan community engagement (see Section 5);
- Consider draft findings of BC's EA Assessment and the ongoing efforts of BC to work collaboratively with TCG on its management of the Red Chris Mine through the Tahltan – BC Government-to-Government Red Chris Mine Management Agreement (RCMA).<sup>4</sup> (See Section 4.1.3.2).
- Demonstrate rigour and transparency of process for the purposes of procedural fairness and in the spirit of collaboration;
- Consider the complexity of assessing a proposed substantial mine to an already-operating mine (e.g. some steps were modified to acknowledge existing effects and to recognize NRCML is applying for an amendment to an existing EA Certificate).
- Consider the Block Cave Amendment as an element of the larger Red Chris Mine development scenario that will eventually need to be closed and reclaimed, and consider the trajectory of the Red Chris Mine in relation to Tahltan's long-term expectations as expressed in the TSP, Tahltan Risk Assessment Factors and Tahltan Sustainability Requirements, and other, ongoing technical closure planning processes.

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<sup>4</sup> *Tahltan-Province Government-to-Government Red Chris Mine Management Agreement between the Province of British Columbia and Tahltan Nation, signed January 24<sup>th</sup>, 2017.*

# Tahltan Risk Assessment Methodology

## A TAHLTAN RISK ASSESSMENT IS INITIATED

A project is proposed within Tahltan Territory and a Tahltan Risk Assessment is initiated



Figure 4: Tahltan Impact Assessment Methodology Overview



**Figure 5: Summary of TRA Steps to track progress in Section 9**

**3.9.2 TRA Supporting Definitions and Measures**

**3.9.2.1 Tahltan Areas of Interest**

Tahltan Areas of Interest (AOIs) were identified by considering Tahltan Knowledge as documented in the TAS and considering areas of the TSP, and delineating areas across Regional, Landscape, and Site-Specific scales that are relevant to Tahltan and considering potential effects of concern from the proposed Block Cave Amendment. Effects were characterized by value across the AOIs and for each Tahltan Core Priority across the Tahltan Continuum for each AOI.

**3.9.2.2 Tahltan Significance Factors**

As per the Declaration Act Agreement, the Block Cave Amendment will be measured against the Tahltan Significance Factors. The Tahltan Significance Factors are the factors set out at section 9.22 of the Tahltan Impact Assessment Policy. For this Tahltan Risk Assessment Report, significance was ultimately considered in responses to the Tahltan Risk Assessment Factors and Sustainability Criteria, but specific impacts to Tahltan Values were measured against Tahltan Significance Factors to determine severity and to form one of the inputs into TCG’s consideration of the Tahltan Risk Assessment Factors and Tahltan Sustainability Requirements. To rate the severity of effects on key Tahltan Values at different scales across AOIs, criteria were developed as set out below in Table 2.

**Table 2: Tahltan Significance Factor Descriptions**

Criterion	Definition	Rating		
Context	Condition of the value, with consideration of the Tahltan Continuum – ancient and historical context, current stressors on the AOI, and trajectory of change into the future.	<b>Healthy</b> Value in the AOI has not declined in ancient and historical period and is not currently in decline.	<b>Compromised</b> Value in the AOI has appreciably declined in ancient and historical period. However, the AOI is not currently in decline and/or is moderately in decline.	<b>Impacted</b> Value in the AOI has severely declined in the ancient and historical period and the future trajectory does not predict recovery.
Magnitude	Degree of the change the impact will likely cause relative to an established context of Tahltan Core Priorities, Tahltan Sustainability Plan (TSP), and Tahltan Rights.	<b>Low</b> Slightly alter or change the value based on TSP, Core Priorities, and Rights without changing the role or function.	<b>Moderate</b> Will alter or change the nature, role, or function of the value but will not affect its integrity of the value or AOI based on TSP, Core Priorities, and Tahltan Rights without changing the role or function.	<b>High</b> Will substantially alter or change the nature, role, or function of the value and may jeopardize the value’s integrity based on TSP, Core Priorities, and Tahltan Rights.

Criterion	Definition	Rating		
Extent/Scale	Area over which impact is expected to occur. This may differ from the physical footprint of the change.	<b>Site Specific</b> Impacts limited to the Project Site, avoids preferred areas, little impact on interconnectedness.	<b>Local</b> Impacts extend beyond the Project Site, may affect preferred/valued areas, disrupts interconnectedness.	<b>Regional</b> Impacts which extend beyond the local area, especially preferred/valued areas, disrupts interconnectedness.
Duration	How long an impact is predicted to last.	<b>Short-term</b> Short-term, only a year or two.	<b>Medium-term</b> Lasts for more than a year or two but less than one generation.	<b>Long-term</b> Persists beyond one generation.
Reversibility	Ability to return to established context.	<b>Reversible</b> Easily reversible.	<b>Partially Reversible</b> Reversible but requires significant effort and cost or will take a long time via natural processes.	<b>Irreversible</b> Permanent or persistent alteration.
Frequency	How often an impact occurs.	<b>Once</b> Confined to one event.	<b>Periodic</b> Occurs intermittently over the lifecycle of the Project.	<b>Continuous</b> Occurs on an ongoing basis over the lifecycle of the Project.
Affected Populations	Proportionality to which the impact will be felt between distinct and diverse subgroups.	<b>Even</b> The impact is experienced the same way across Tahltan members, including distinct and diverse subgroups.	<b>Disproportionate</b> The impact is experienced only by certain distinct or diverse subgroups or experienced more severely by a distinct or diverse subgroup.	
Confidence in information and contingencies	Degree of confidence in available information.	<b>Low</b> The cause-effect relationships between the Project and between the Project, AOI, and Tahltan values with both Tahltan Knowledge and western science are poorly understood. There may be several unknown external variables and/or data for the project area that are incomplete. The effectiveness of the mitigation measures may not yet be proven. Modelling results	<b>Moderate</b> There is a moderate understanding of the cause-effect relationship between the project, AOI, and Tahltan values with both Tahltan Knowledge and western science. The information is limited, has some gaps, and there are some uncertainties to support the Tahltan Assessment. The selected mitigation measures have been applied elsewhere with variable outcomes or have been applied	<b>High</b> There is a good understanding of the cause-effect relationship between the project, AOI, and Tahltan values with both Tahltan Knowledge and western science. There is sufficient information to support the Tahltan Assessment. The selected mitigation measures have been applied elsewhere with the desired outcomes. There is a low degree of uncertainty associated with Tahltan Knowledge, CP and TSP directions, western science data inputs and/or modelling techniques, and variation from the predicted effect is expected to be low.

Criterion	Definition	Rating		
		<p>may vary considerably given the data inputs. There is a high degree of uncertainty in the conclusions of the assessment.</p>	<p>elsewhere but are untested in the project area or AOI. There is a moderate uncertainty associated with Tahltan Knowledge, CP and TSP directions, western science data inputs and/or modelling techniques, and variation from the predicted effect is has moderate variation or uncertainty of success.</p>	
<p>Risk and Uncertainty</p>	<p>An estimate of the probability that a potential impact on the AOI will occur because of the Project. Considers the degree of evidence available and level of certainty to characterize the risk of occurrence.</p>	<p><b>Low</b></p> <p>A potential impact on the AOI has a low probability of risk and is unlikely but could occur.</p>	<p><b>Moderate</b></p> <p>A potential impact on the AOI has probable risk and is likely but may not occur.</p>	<p><b>High</b></p> <p>An impact to the AOI is of high risk to occur. Strong evidence is available and there is a high level of certainty in characterizing the likelihood of a potential impact to occur.</p>

### 3.9.2.3 Severity Evaluation

Effects on Tahltan Values were evaluated and characterized based on the above Tahltan Significance Factors, considering mitigation measures committed to in the Application by NRCML, to determine the overall severity of effects from the Block Cave Amendment, as follows:

Low: The value is not perceptibly modified by the project at the scale considered.

Moderate: The value is modified by the project at the scale considered, but the effect falls within the range of natural or community accepted variability.

High: The value is predicted to be modified by the project at the scale considered, and the effects will modify the condition of the value beyond natural or community accepted variability.

### 3.9.2.4 Tahltan Core Priorities

Tahltan Core Priorities are described in detail in the TSP and have been adapted to Tahltan major project Core Priorities to guide Tahltan Risk Assessments. Along with considering the alignment of the proposed Block Cave Amendment to the TSP, considering effects on Tahltan major project Core Priorities helps holistically consider the potential effects of the project on Tahltan.

Definitions of the Tahltan Core Priorities used to guide assessment of effects in Step 3 of the methodology are set out in Table 3, below:

**Table 3: Description of Tahltan Core Priorities**

<b>Description of Tahltan Core Priorities</b>	
<b>Priority 1: Health of the Land</b>	
<p>Maintaining the long-term health of the land (including all of its terrestrial and aquatic ecosystems) is a mandatory condition for any kind of land use in all areas within Keyeh.</p> <p>Connection to the land is at the core of Tahltan culture and identity. Kinship expresses this connection. It means that Tahltan know that we are dependent on the generosity of Netce'nsta, and as a result, we have an obligation to treat her and all her children with the utmost respect and reverence. If we damage the land, we damage our relationship to the land, and so we damage ourselves.</p>	
<b>Priority 2: Tahltan Way of Life</b>	
<p>The land must be able to continue supporting our Tahltan way of life while meeting the "health of the land" condition established under Priority 1.</p> <p>Tahltan way of life includes maintaining our personal connection with Keyeh and with each other. We are a nation made up of families and communities, and in this way our way of life is both individual and collective. Supporting our Tahltan way of life means our people being able to live in thriving Tahltan communities. It means quiet enjoyment of the land for our families to harvest, hunt, gather medicines, and conduct cultural and spiritual practices. It means being able to support ourselves, physically, economically, culturally and spiritually from the land. It means healthy Tahltan people and communities.</p>	
<b>Priority 3: Tahltan Rights and Title</b>	
<p>Tahltan Rights and Title must be protected, upheld and continue to be exercisable for current and future generations.</p> <p>Tahltan Rights and Title are connected to our way of life considered under Priority 2, and include our rights to hunt, gather, fish, trap, as well as our Aboriginal title and governance rights and the right to make decisions about and manage developments in Keyeh.</p>	
<b>Priority 4: Ability to Reclaim and Restore</b>	
<p>Land that has been impacted or degraded through industrial use must be healed, through reclamation, restoration, and ritual ceremony to support Priorities 1, 2, and 3.</p>	

TCG characterized the impacts on Tahltan Core Priorities for each AOI across the Tahltan Continuum for a holistic, cumulative assessment of the condition of the AOI over time in Step 1, and to predict the specific impacts of the Block Cave Amendment when considering the "future with the project" in Step 3. Effects on the Tahltan Core Priorities were characterized using the following descriptors, rating conditions relative to each other on a scale of worsening effects, as per Table 4.

**Table 4: Core Priority Characterization Criteria**

<b>AOI Characterization</b>	<b>Definition</b>
<b>Healthy</b>	Tahltan Core Priorities and TSP Management Directions are being met. The AOI is functioning within the natural ranges of ancient, historical, and current times.
<b>At Risk</b>	Tahltan Core Priorities and TSP Management Directions are being met but can be violated with additional resource development or direct effects are greater than estimated. The AOI is functioning within the natural ranges of ancient, historical, and current times but is at risk to future effects.
<b>Stressed</b>	Tahltan Core Priorities and TSP Management Directions are being stressed but can be restored/maintained through mitigations, conditions, and increased application of TSP management directions for restoring/reclaiming the land. The AOI is not functioning within the natural ranges of ancient, historical, with the current and future effects are stressing the land.
<b>Degraded</b>	Tahltan Core Priorities and TSP Management Directions are being degraded for one or more associated Tahltan Values but may be restored/maintained through mitigations, conditions, and increased application of TSP management directions for restoring/reclaiming the land.

<b>Impacted</b>	Tahltan Core Priorities and TSP Management Directions for one or more associated Tahltan Values are violated and the ability to restore the AOI is either 3 or more generations or irreversible.
<b>Impacted +</b>	For the AOI, Tahltan Core Priorities will experience an additional impact from the proposed Amendment (used only if the characterization without the Amendment is “Impacted” and a substantive additional change is predicted).

### 3.9.2.5 Significance Evaluation

Once the severity of the effect was determined per Tahltan Value across AOIs, effects on Tahltan Core Priorities across the Tahltan Continuum for each AOI were assessed, and alignment with the TSP was considered, significance was determined holistically, described by responding to the Tahltan Risk Assessment Factors. TCG’s consideration of Tahltan Risk Assessment Factors and Tahltan Sustainability Criteria was further informed by Tahltan members’ views and directions received through engagement through the entire Tahltan Risk Assessment process. Where significance was determined (Step 4), additional recommendations for binding conditions and terms were considered (Step 5) before final conclusions were reached (Step 6).

### 3.9.3 Additional Information and Understandings of the Assessment

The Tahltan Risk Assessment was developed to be as consistent as possible with direction of the Declaration Act Agreement, the TSP and to best inform TCG’s decision makers. Authors worked to address the goals of the TRA while recognizing the many factors influencing its development, including but not limited to:

- This TRA is the second authored by Tahltan and the first to contemplate an amendment to an EAC. TCG had to consider the existing effects of the operating Red Chris Mine and the existing collaborative management structures while respecting the scope of the proposed Block Cave Amendment.
- This TRA was developed in parallel to and concluded following the Eskay Creek Revitalization Project (ECRP) TRA, but unique attributes of both projects required tailored approaches.
- Contemporary EA Policies and practices, such as those developed to meet requirements of the EA Act do not meet expectations of a Tahltan assessment, specifically the need to consider impacts holistically, cumulatively, and across multiple scales. Tahltan developed their own holistic approach based on the Tahltan foundational documents, laws, stewardship principles, and practices to develop and implement the Tahltan Risk Assessment. Differing approaches and perspectives on impacts also influenced TCG’s ability to reach consensus with the BC EAO (See Section 7).
- The Tahltan Risk Assessment is led by Tahltan Knowledge and informed by western science and technical information. The limitations of western science with a holistic approach of the TRA required the Lands Department to make assessments of potential effects through the knowledge of both worlds which resulted in outcomes that reflect the current understandings of both worlds in our assessments and recommendations.
- The TSP was developed and finalized in parallel to this TRA, which aided in determining the potential effects to Tahltan Core Priorities. For future TRAs, the TSP management directions require earlier incorporation into the TRA.
- Key pieces of information, such as the HHRA and HIA were developed in parallel to the TRA, rather than findings being included, as desired by Tahltan, in the original Amendment Application, requiring continuous adjustment and development through review of the Amendment Application and TRA drafting.
- As with any impact assessment and attempts to forecast the future, TCG, like BC, must work with an incomplete idea of future events. Therefore, TCG has attempted to focus on using the information available to inform the conclusions in this Tahltan Risk Assessment Report and to establish systems to address uncertainties.

Given the above understandings and the limitations identified in section 1.2, Tahltan expects the Tahltan Impact Assessment Policy and associated methodology to continue to evolve with learnings from this Red Chris TRA, from the ECRP TRA, from the TSP, and in contemplation of other currently proposed projects and commitments of future consent-based Agreements in Tahltan Territory.

## 4 Project Context and Amendment Proposal

### 4.1 RED CHRIS DEVELOPMENT CONTEXT

Exploration activities across the Todagin Plateau and in the vicinity of the Red Chris Mine have been occurring since the 1950s. Licenses under several different exploration companies eventually led to delineation of the Red Chris deposit in the early 2000s. Under the ownership of Imperial Metals, the Red Chris Mine received their Environmental Assessment Certificates to develop an open pit mine from British Columbia in 2005 and Canada in 2006. The federal EA decision was challenged in Court, but upheld by the Supreme Court of Canada in 2010. British Columbia issued operating permits in 2012. Following several years of construction, the Red Chris Mine officially began operations in February 2015. In 2017, Newcrest Mining acquired a 70% stake in the project, establishing Newcrest Red Chris Mine Limited (NRCML). On November 6, 2023, Newmont Corporation (Newmont) purchased Newcrest Mining and became the majority owner and operator of the Red Chris Mine, maintaining NRCML as the legal operating entity.

#### 4.1.1 Newmont Corporation

Newmont Corporation is based in Denver, Colorado, USA, and hails itself as the world-leading gold-miner (Newmont Corporation n.d.). Newmont has a short history of investing and being involved with major projects in Tahltan Territory (NRCML 2025c). Their first investment in the area was seen in 2018 when they partnered on the Galore Creek Project, which is North America's largest underdeveloped copper deposit. In 2021, Newmont acquired GT Gold and the Saddle project. Newmont then acquired Newcrest in November 2023, which resulted in a 70% operating interest in Red Chris, and acquisition of Brucejack Mine.

#### 4.1.2 Current Regulatory Regime and Compliance History

The Red Chris Mine is governed primarily by the following regulatory mechanisms:

- The 2005 EA Certificate (EAC #M05-02) from British Columbia, now having been amended 5 times (with Block Cave Amendment being the sixth potential amendment)
- The M240-Permit from the Ministry of Mining and Critical Minerals, originally issued in 2012 and regularly amended, with the most recent amendment approved in December, 2025. This permit regulates on-site mine activities and infrastructure. NRCML is further subject to the Health, Safety and Reclamation Code for Mines in British Columbia.
- The PE-105017 Permit from the Ministry of Environment and Parks. This permit regulates water discharges from the tailings impoundment area (TIA) and requires water monitoring and environmental monitoring along with provision of annual reports and meetings with BC regulators and Tahltan to review environmental performance.
- The PA-106668 Permit from the Ministry of Environment and Parks, regulating air emissions discharges and monitoring.
- An Independent Tailings Review Board, as per Section 10 of BC's Health, Safety and Reclamation Code for Mines in British Columbia.
- A number of supplementary permits, including those regulating land use, the access road, the transmission line, transport and handling of explosives, surveying and identifying archaeological resources, permits to operate the employee camp, etc.
- Newmont is further subject to provincial regulations from Worksafe BC in relation to the Red Chris Mine's onsite workforce.

Both desktop and on-site inspections of the Red Chris Mine to confirm compliance with provincial and federal laws and regulations occur regularly, with the bulk of inspections addressing the major M240, PE-105017 and PA-106668 permits, but also compliance with the existing provincial EAC and health-and-safety related requirements. Since 2019, Newmont states the Red Chris Mine has achieved 95% compliance with EAC conditions and that past non-compliance issues, such as wildlife attractants and road erosion, have been addressed by NRCML.

From THREAT's perspective, compliance with Provincial permits is generally satisfactory for the major project commitments, though inspections regularly highlight issues and deficiencies that must be addressed. Several deficiencies prior to Newmont's acquisition resulted in administrative penalties issued in 2025. TCG's key concerns with the operation of the Red Chris Mine over the last several years included failure to update water monitoring locations in the permits, late reporting and late updates to water models, waste management,

unexpected spills, and water management and water quality issues. Since the Newmont purchase, THREAT has generally observed improvement in NRCML's efforts to align with and deliver on permit commitments. Systems for environmental reporting have improved; key water management documents including the Trigger Action Response Plan (TARP) and Seepage Effects Mitigation Program (SEMP) have been updated and re-written; water modelling has become more sophisticated; and Newmont has generally delivered regulatory commitments on time. Nevertheless, key deliverables committed to Tahltan when exploration work relating to the transition to Block Cave was being permitted, such as the tailings thickener and coarse ore stockpile cover, though advancing, are taking more time to construct and commission than originally promised. Water quality trends continue to decline in certain receiving environments, and THREAT believes actions taken to date are not sufficient to address the growing water quality problems. The continuous improvement cycle for environmental performance tied to the annual reporting cycle is being strengthened, though implementing key mitigations on site remains slow.

#### **4.1.3 Collaboration for Management of Red Chris Mine**

Tahltan currently collaborates with both NRCML and BC on the management of the Red Chris Mine through several distinct but related avenues, including:

- (1) Through the Tahltan-NRCML IBCA originally signed in 2017, and amended with NRCML to consider the potential conversion to Block Cave in 2019.
- (2) Through the Tahltan-BC Red Chris Management Agreement (RCMA), signed with the Province of British Columbia in 2017.
- (3) Through the Red Chris Monitoring Committee (RCMC), established under the PE-105017 Permit from the Ministry of Environment and Parks.
- (4) Through the Wildlife Management Advisory Committee (WMAC), mandated in the 2005 EAC Commitment C2, established through the 2012 Wildlife Management Plan for Red Chris, and confirmed through the *Tahltan Central Government - British Columbia Accord on Wildlife Management in Tahltan Territory, dated September 8, 2022*.

##### **4.1.3.1 The Tahltan-NRCML IBCA**

The IBCA, in addition to financial commitments associated with mine revenue, community benefits, and contracts, establishes the following collaborative management structures between NRCML and TCG:

- The Project Advisory Committee (PAC) comprised of NRCML and TCG leadership to oversee collaborative management of the Red Chris Mine.
- The Environmental Oversight Committee (EOC): comprised of senior environmental staff at the Red Chris Mine and the Director and staff representatives of TCG's Lands and Regulatory Affairs Department. The EOC is tasked with monitoring environmental performance of the Red Chris Mine and developing joint recommendations for environmental management to the PAC. The EOC has two technical subcommittees:
- The Tailings and Water Stewardship Subcommittee: This subcommittee is comprised of technical experts from NRCML and THREAT to understand and collaboratively consider environmental data to improve water quantity and quality at the Red Chris Mine.
- The Major Permit Amendments and Applications Subcommittee: This subcommittee is comprised of project management and technical staff from NRCML and THREAT who focus on reviewing and assessing NRCML's desired regulatory changes, such as this the Block Cave EAC Amendment Application. Instead of discrete meetings, this subcommittee generally functions on a day-to-day basis, advancing all issues associated with the regulatory requirements for the Red Chris Mine.
- The Socio-Cultural Committee (SCC): composed comprised of TCG staff who can speak to the socio-cultural impacts and benefits of the Red Chris Mine, this subcommittee works to improve socio-cultural conditions at site and for Tahltan communities, particularly for those tied to existing NRCML regulatory commitments. The SCC can also generate joint recommendations to be forwarded to the PAC.

The above structures form the backbone of the collaborative relationship between NRCML and TCG, though engagement between TCG/THREAT and NRCML also occurs regularly and consistently through other channels. The relationship between THREAT and NRCML technical representatives has generally been positive, productive and respectful, though NRCML is challenged to meet THREAT expectations for site environmental management. Though open dialogue and consideration of THREAT views at the technical level occurs regularly, limited avenues for collaborative decision making on mine management and planning are available at the EOC

and PAC levels. Newmont has strong internal financial and decision-making processes, which are not built to dovetail with the commitments of the IBCA and collaborative management.

NRCML has further forged a number of additional avenues for engagement with Tahltan communities, either directly or through Red Chris community liaisons, through social and economic engagement in communities, by supporting community services (such as emergency response/medevac services), and through personal and professional relationships. NRCML has recently highlighted their 10-year Anniversary community contribution, pledging \$8 million for community priority projects.

#### **4.1.3.2 The Red Chris Management Agreement (RCMA)**

The Red Chris Management Agreement (RCMA), signed in 2017 with the Province of British Columbia, was executed in recognition of Tahltan's ongoing concerns with environmental performance of the Red Chris Mine and Tahltan's desire to collaborate with BC on the regulatory oversight of the site. The RCMA recognizes that it is an interim step towards a more comprehensive land and stewardship agreement with BC, but remains in place at the time of drafting of this TRA.

The purpose of the RCMA is to establish oversight structures, establish collaborative processes for regulatory application review between BC and TCG, and to mandate Tahltan participation in monitoring and compliance auditing of EA and permit conditions related to environmental, geotechnical, and reclamation inspections. Additional purposes include oversight of the Independent Tailings Review Board (ITRB), maintaining linkages across regulatory requirements, coordinating efforts related to the Red Chris Mine across BC ministries, respecting and incorporating Tahltan Knowledge, and ensuring Tahltan concerns related to the Red Chris Mine are collaboratively discussed and addressed.

The main outputs of the RCMA are an annual work plan (or 'planning cycle'), an annual Roll-Up Report that details work under the RCMA for the year and compliance and enforcement performance, and regular meetings between BC and Tahltan representatives, as dictated by the Red Chris Management Forum Terms of Reference.

Implementation of the RCMA has varied since 2017. Initial focus of implementation was including TCG staff in BC's compliance and enforcement activities through accompanied inspections, which progressed until the COVID 19 pandemic greatly reduced internal capacity for both TCG and BC. In 2023, the RCMA was revived and implementation has progressively increased. Current activities under the RCMA include:

- Development and execution of an annual workplan;
- Bi-weekly meetings of the Joint Agreement Implementation Team (JAIT);
- Strengthened coordination of regulatory requirements across BC ministries and with TCG/THREAT;
- Meetings of the BC-TCG Executive Table;
- Production of the annual roll-up report; and
- Invitations to submit issues to inform provincial compliance and enforcement activities, and invitations for Tahltan participation in BC compliance and enforcement site inspections.

Though the RCMA is being implemented, fulsome implementation is hampered by limited funding that is not guaranteed year-to-year, especially to fund TCG participation in inspections. Further challenges include Tahltan capacity, clarity of commitments, and structural supports for implementation of the full RCMA. Nevertheless, the JAIT has proven a valuable and effective coordination body during the review of the Block Cave Amendment, helping to support consistent communication between the key BC ministries and THREAT as EAC and permit reviews advance.

#### **4.1.3.3 The Red Chris Management Committee**

As mandated by their permits, Newmont produces annual reports detailing results from all of their environmental monitoring programs for review by BC and TCG/THREAT. They further organize and host a Red Chris Management Committee (RCMC) meeting annually in June to review the results in person with representatives of TCG/THREAT and BC. TCG/THREAT submits comments and questions on the report and meeting materials. In recent years, Newmont, THREAT, and the Ministry of Environment have established an online-tracking system to ensure responses to THREAT comments are received and changes and improvements are tracked year over year to support continuous mine environmental performance improvement. Though the system for annual reporting and continuous improvement has improved over the last several years, additional effort is needed to ensure full implementation of the online tracking tool and to ensure THREAT comments and concerns are meaningfully considered and influence NRCML environmental management.

#### **4.1.3.4 The Wildlife Management Advisory Committee (WMAC)**

The Red Chris Wildlife Management Advisory Committee (WMAC) is comprised of Newmont, BC's Ministry of Water, Lands, and Natural Resource Operations, and representatives of the TCG Wildlife Department (Director and Staff). The WMAC is mandated to meet annually to review results of annual wildlife monitoring on site and the Annual Wildlife Report. The WMAC further meets to guide review of and updates to Newmont's Wildlife Management Plan. The WMAC has been a collaborative body supporting an adaptive management approach to maintaining a culturally important area with high value plants, fish, wildlife populations interconnected to Tahltan way of life. It has been functioning since 2014, with the use of thresholds for mountain ungulate populations, extensive monitoring programs, and sharing of information by all involved.

## **4.2 BLOCK CAVE AMENDMENT PROJECT DESCRIPTION**

NRCML is proposing to transition the Red Chris Mine from an open pit to an underground, block cave operation. Though the current open pit mine is fully permitted to operate until the tailings facility reaches a height of 1180 metres above sea level (masl), Newmont predicts that open pit operations will prove uneconomic and the mine will move to closure within the next two years. The proposed transition to block cave mining will allow the mine to operate with access to higher ore concentrations and lower extraction and processing costs. To convert to block cave, NRCML expects a three-year construction period to be followed by a 12-year period of production before closure (see Figure 6 for approximate timing for different mine development scenarios).

The proposed Block Cave Amendment components and activities include the following:

- Process plant expansion, building upgrades and laydowns.
- Upgraded and expanded camp and administrative area to support the increased workforce from 1200 to 1500 people, including additional freshwater wells and expanded potable water and sewage treatment.
- New ancillary infrastructure and upgrades to existing infrastructure, including a new mine dry facility accommodating 500 people, modification to existing roads, a new road bypassing the process plant, expansion of the 17.5 km Quarry, fuel storage and distribution upgrades, electrical substation upgrades and emergency power generation facilities, and construction facilities, including laydown areas.
- Development of pre-conditioning drill pads in the vicinity of the open pit area.
- Underground mining spaces, including undercut level, extraction level, and drawbells.
- Underground mining infrastructure including a maintenance workshop, fuel station, and explosives magazine.
- A Material Handling System (MHS), including storage bins, crusher, feeder, conveyor and other supporting components.
- Underground infrastructure including an expanded ventilation system, mine dewatering system, and communications system.
- Underground roadways.
- A subsidence zone.

NRCML sees a number of potential benefits for Tahltan when transitioning to Block Cave mining and states that the expansion of the Red Chris Mine has potential to:

- Bring more long-term benefits to Tahltan communities without causing more environmental harm relative to current open pit operations (NRCML 2025c, 4-6). The construction of the proposed expansion would also create additional business opportunities, which could benefit Tahltan businesses, for services such as earthworks, steel erection, safety and traffic services, concrete and aggregate supply, and equipment rentals (NRCML 2025c, 4-14).
- Reduce the volume of waste rock to be stored at the Red Chris Mine and decrease the amount of potentially acid generating (PAG) rock produced that needs to be managed as part of the closure plan.
- Reduce the area disturbed by mining when comparing the Block Cave subsidence zone to the equivalent size of a fully developed open pit.

- Reduce surface activities and equipment along with the related consumption, including diesel usage, greenhouse gas (GHG) emissions, and explosive use, as well as dust generation (NRCML 2024a)

### 4.3 ALTERNATIVE FUTURES FOR RED CHRIS

Existing regulatory approvals for Red Chris allow development of the site as an open pit until dam height reaches 1180m. However, based on information provided by NRCML, if the Red Chris Mine does not transition to Block Cave, the most likely alternative development scenario is near-term closure of the mine. See Figure 6 for a comparison of approximate mine development timelines between continuing the open pit as permitted, closing the open pit without transitioning to Block Cave, and the proposed Block Cave scenarios.

If Block Cave mining does not advance and the existing open pit moves to closure, the existing Closure and Reclamation Plan would be enacted. The existing closure plan includes the removal of unneeded infrastructure, establishment of stable landforms, flooding of the open pit, collecting and treating contact water from the reclaimed site area, maintaining a 2m water cover on the TIA, and perpetually managing seepage from the TIA and RSA. The existing Closure and Reclamation Plan does not align with the Tahltan Sustainability Requirements, particularly Requirement 8 (See Section 9.4.2) because of the need for perpetual water management. Closure of the Red Chris Mine will significantly reduce the needed workforce and post-closure will only require ongoing maintenance and monitoring activities. Community benefits associated with the presence of the Red Chris Mine in Tahltan Territory would be expected to be reduced commensurately. See Section 9.4.1.1.5 for further discussion of Closure as it relates to the Block Cave Amendment.

YEARS from 2026	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
<b>Open Pit Moving to Closure</b>	Operations		Closure (6 years)						Post Closure (perpetuity)															
<b>Permitted Open Pit</b>	Operations (16 years)															Closure (6 years)						Post Closure		
<b>Block Cave Advances</b>	Construction (3 years)		Operations (12 years)												Closure (6 years)						Post Closure (perpetuity)			

**Figure 6: Comparative timelines for Open Pit and Block Cave Mine development scenarios**

#### 4.3.1 Potential Development Post Block Cave, Macro Block 1

Through the Amendment Application, NRCML is applying to develop what is termed “Macro Block 1”, the deposit below the current East Pit. Prior to Newmont’s acquisition, NRCML completed a 2021 Pre-Feasibility Study to assess the feasibility of developing a Block Cave Mine to access ore in what they delineated as three macro-blocks that extend under the existing Main and East pits of the Red Chris Mine and encompass approximately 300 million tonnes of ore (NRCML 2025c, 4-5). These macro-blocks are referred to as Macro Block 1, Macro Block 2, and Macro Block 3. Despite their Pre-Feasibility Assessment, NRCML has repeatedly verified that the proposed Block Cave Amendment, which targets only Macro Block 1, warrants their investment in Block Cave infrastructure, and NRCML is making no commitments to accessing the additional ore at this time. Nevertheless, Macro Block 1 is being engineered to not interfere with the ability to expand and access additional ore. If NRCML wanted to pursue further expansion beyond Macro Block 1, a modified and alternative approach to tailings management would be required. Beyond technical constraints, any further major expansion or alteration to the site would be considered a ‘Substantial Change’, triggering the need for Tahltan assessment and consent pursuant to the Declaration Act Agreement.

## 5 Results of Tahltan Engagement

### 5.1 SUMMARY OF TAHLTAN ENGAGEMENT

Earlier sections of this Tahltan Risk Assessment Report (Sections 2.2.4 and 3.1.4) have summarized the outcomes of engagement undertaken by TCG through the implementation of the Declaration Act Agreement and the Tahltan Risk Assessment for the Block Cave Amendment. The purpose of the Tahltan community engagement requirements under the Declaration Act Agreement is to ensure that the views and perspectives of Tahltan members and communities are meaningfully incorporated at each phase of the Tahltan assessment.

To meet these obligations, TCG facilitated a range of opportunities for Tahltan members and communities to learn about the Block Cave Amendment, understand its potential effects on Tahltan Values, review proposed mitigations and conditions, and provide feedback, guidance, direction, and knowledge throughout each phase of the Tahltan Risk Assessment and implementation of the Declaration Act Agreement.

This section further outlines the Declaration Act Agreement requirements, how TCG facilitated and met these obligations, and ways in which meaningful engagement was supported, considered, and incorporated into TCG's assessment of the Block Cave Amendment. It describes how feedback, guidance, direction, and Tahltan Knowledge were received, responded to, and integrated to inform both the Tahltan Risk Assessment Report and the implementation of the Declaration Act Agreement.

In total, the Tahltan Central Government facilitated over 40 engagement and information opportunities for Tahltan members through a variety of methods to ensure accessible, culturally appropriate, and meaningful opportunities for feedback, direction, guidance, understanding, and knowledge sharing to inform TCG's assessment of the Block Cave Amendment (see Section 5.2 of this Report).

Engagement with Tahltan members about the Block Cave Amendment to inform the Tahltan Risk Assessment has occurred through a variety of forums, including:

- TCG Lands and Regulatory Affairs-led Engagements
- NRCML-led Engagements, with TCG Lands and Regulatory Affairs organization, participation, and support
- Information packages with optional feedback pages, distributed at community engagements and placed at Band Offices
- NRCML-authored outreach materials

Virtual Information Webpages:

- Newmont's Block Cave Virtual Open House: <https://www.redchris-virtualopenhouse.com/>
- TCG's Block Cave Amendment page: <https://tahltan.org/red-chris-block-cave-information-package/>
- BC EAO-led Engagements, including:
  - Public Website: <https://projects.eao.gov.bc.ca/p/588510c4aaecd9001b8155e3/project-details>
  - Public Engagement period: March 11 – April 10, 2025
  - Virtual Information Session: April 2, 2025

### **5.1.1 Proponent History and Engagement with TCG**

Engagement between NRCML and TCG on the proposed transition from an open pit to underground block cave mine began in 2019 when NRCML acquired a 70% interest in the Red Chris Mine and became the operator, with Imperial Metals retaining a 30% interest. NRCML was interested in strengthening their relationship with TCG, resulting in NRCML and Tahltan leadership amending and updating the existing IBCA in 2019.

On July 15, 2020, TCG and NRCML entered into a Tahltan Knowledge Protocol, further amended in September, 2024. The protocol is a foundational relationship agreement that established how NRCML and TCG would work collaboratively on ongoing communication, engagement, and treatment and handling of Tahltan Knowledge.

To support meaningful and culturally grounded engagement throughout the environmental assessment and implementation of the Declaration Act Agreement, TCG and NRCML later established a Capacity Funding Agreement. This agreement enabled TCG to allocate the technical capacity and resources required to support Tahltan member and community engagement during the Block Cave Amendment, aimed at ensuring that feedback, interests, and guidance could be fully incorporated into TCG's assessment processes.

### **5.1.2 Tahltan Member Engagements with NRCML**

Since 2019, NRCML has been engaging with Tahltan leadership, community members, and relevant committees relating to the operation of the Red Chris Mine about the Block Cave Amendment. Engagement activities undertaken by NRCML since 2019 include in-person and virtual community meetings, small group sessions, site tours, workshops, formal presentations.

**5.1.2.1 Newmont Engagement with TCG**

NRCML also noted in the Amendment Application the ongoing engagements they've had directly with Tahltan leadership, the Lands and Regulatory Affairs Department, and THREAT representatives (NRCML 2025c). These engagements have been numerous and include meetings of the IBCA collaborative management structures (PAC, EOC, SCC, and TWSSC committees), as well as meetings directly with leadership, especially during transitions of TCG leadership and transitions from Newcrest to Newmont ownership. Tahltan Leaders have also attended site visits at the Red Chris Mine on several occasions, were involved and updated during and after the Fall of Ground event, and attended sessions for community members. (For further details on the Fall of Ground event see Section 9.2.1.4.1.1.2).

In addition to engagements with Tahltan, as per the Declaration Act Agreement, TCG worked collaboratively with the EAO to assess the proposed Block Cave Amendment. NRCML has coordinated with the EAO and the TCG to support this collaboration through regular joint meetings, site tours, and communications. See further details on proponent engagement in Section 8.

**5.1.3 Key Concerns and Messages Heard at Tahltan Engagements**

Table 5 provides a summary of the outcomes of Tahltan community and membership feedback during the Block Cave Amendment and implementation of the Declaration Act Agreement phases.

**Table 5: Summary of key concerns from Tahltan member community engagement**

Topic	What we Heard
<b>Ground and Surface Water</b>	<ul style="list-style-type: none"> <li>• Current and long term tailings management, particularly effects on downstream ecosystems and Tahltan users due to seepage and contamination from the mine</li> <li>• Risk of a potential tailings dam breach and its effects on downstream communities and riparian areas</li> <li>• Potential effects of the Red Chris Mine on water resources (Quarry Creek to Klappan River watershed, and Trail Creek to Kluea Lake watershed, Northeast Arm to Klappan River), including habitats of cultural interest</li> <li>• Concerns about long term and permanent water quality impacts due to seepage from the TIA, RSA and other potential sources.</li> <li>• Concerns about water levels and water quality in Kluea Lake watershed, including whether they will be impacted by the Block Cave</li> <li>• Concerns that tailings thickener will not work as intended and may not be a helpful mitigation for reducing pond volumes and lateral seepage from the TIA.</li> <li>• Concerns water contamination affects Iskut water sources.</li> </ul>
<b>Terrain and Soils</b>	<ul style="list-style-type: none"> <li>• Concerns about dam stability, construction, erosion, and safety of downstream uses, including those at culture camps</li> <li>• Concerns about contaminated soils and accumulation in waters, vegetation, wildlife and humans</li> <li>• Questions regarding stability of pit and cave walls</li> <li>• Questions about effects of earthquakes, mine's creation of seismic events, and if dams are built on fault lines</li> <li>• How big will the subsidence zone be, and how big will it be if future macro blocks are built?</li> </ul>
<b>Fish, Fish Habitat, and Aquatic Resources</b>	<ul style="list-style-type: none"> <li>• Concerns of water quality and seepage impacting downstream habitats and fish: "should we be eating fish from Ealue and Kluea?"</li> </ul>

Topic	What we Heard
	<ul style="list-style-type: none"> <li>• Risk of a potential tailings break and its downstream effects on waterways, fish, riparian areas.</li> <li>• Long term impacts of exposure of fish to selenium</li> <li>• Have seen dead fish around lakes... is that from the mine?</li> </ul>
<b>Vegetation and Ecosystems Services</b>	<ul style="list-style-type: none"> <li>• Uptake of contaminant by plants due to seepage and air/dust.</li> <li>• Risk of a potential tailings break and its downstream effects on riparian areas.</li> </ul>
<b>Mine Process, Management Plans, and Monitoring</b>	<ul style="list-style-type: none"> <li>• Questions about the concentrate trucks leaving the mine and their size and load capacity.</li> <li>• Safety concerns with Block Cave mining technique.</li> <li>• Questions about the use of AI in mining operations</li> <li>• Questions about using the most advanced equipment possible for underground safety and decreased emissions.</li> <li>• Members sought information on the differences between open pit and underground mining, use milling process, and if cyanide will be used.</li> </ul>
<b>The EA Process</b>	<ul style="list-style-type: none"> <li>• Questions if the Tahltan are able to put forward proposed recommendations into the EA process.</li> <li>• Concerns over the short timeline to make a decision, especially regarding how busy the TCG Lands and Regulatory Affairs Department is.</li> <li>• Members sought clarity on TCG's role in the EA process and how exactly the decision will be made, how consent is determined, and how involved the Lands team will be after the EA process, how collaborative will NRCML and TCG be.</li> </ul>
<b>Human Health</b>	<ul style="list-style-type: none"> <li>• Potential effects from chemicals used in the tailings management process on human health.</li> <li>• Negative effects of rotation work on community and family cohesion, including concerns about increased substance abuse and mental health challenges.</li> <li>• Effects of mining camps on Tahltan and Indigenous women, including the increased risk of harassment or being taken advantage of in these camps.</li> <li>• Potential negative impacts on local food security.</li> <li>• Concerns about safety of underground work and block caving</li> <li>• Concerns about dust and air contaminants in and around Iskut and for Tahltan users of surrounding lands.</li> <li>• Concerns about long range dust transport and deposition, affecting water quality within and beyond mine boundaries through runoff to lakes and rivers.</li> <li>• Shifting work to underground, but air quality potentially still a concern for workers as since air comes out at surface.</li> <li>• Questions related to the hazards of dust exposure for underground workers while underground and when returning above ground (E.g. dust on boots and clothing).</li> </ul>

Topic	What we Heard
	<ul style="list-style-type: none"> <li>• Concerns related to Project-induced road traffic and related effects on community safety.</li> <li>• Concerns related to increases in cancers in Tahltan communities.</li> <li>• Concerns related to long-term health impacts on employees and on families/communities and the fact that the burden of care lands with the communities.</li> </ul>
<b>Tailings Facility</b>	<ul style="list-style-type: none"> <li>• Question of amount of seepage from the dams and the size of the TIA with block cave.</li> <li>• Questions about what is seeping from TIA and RSA.</li> <li>• Will there will be a fence to keep wildlife out of the pond,</li> <li>• Will a new TIA be needed?</li> <li>• Questions about why there isn't a liner in the TIA and why a liner is not being mandated.</li> <li>• Questions on comparisons to other mine tailings facilities in Tahltan Territory.</li> </ul>
<b>Wildlife and Wildlife Habitat</b>	<ul style="list-style-type: none"> <li>• Members raised questions and interests regarding wildlife populations, how the Project may affect wildlife health, and how these effects would be monitored over time.</li> <li>• Impacts of contamination from air quality or seepage on wildlife.</li> <li>• Existing impacts on wildlife, particularly moose, from habitat destruction for original mine construction.</li> <li>• Potential impacts of the Amendment on the wildlife, their migration patterns, and their habitat from noise.</li> <li>• Potential impacts of the Amendment on the availability of target species.</li> <li>• Concerns and questions about whether moose meat is affected by mine—can it be tested before Tahltan consumption?</li> <li>• Concerns about impact of increased traffic on wildlife mortality—how is it reported and tracked?</li> </ul>
<b>Infrastructure and Services</b>	<ul style="list-style-type: none"> <li>• Why are we struggling with community needs when the mine is expanding? (E.g. community learning centre is shutting down; no housing available; community services are limited, etc.).</li> <li>• Recognition of NRCML's significant contribution to emergency response with Medevac services support.</li> <li>• Concerns that Highway 37 is already unsafe. Vehicle incidences also lead to road closures, challenging community members to reach Terrace and Smithers for needs, including for medical appointments, to catch flights, etc.</li> <li>• Concerns that more vehicle traffic for Red Chris will further increase risk of travelling on the highway, especially when considering cumulative traffic increases with Eskay.</li> <li>• Questions as to where committed provincial and federal funding for highway improvements has gone so far, and the slow rate of progress on highway improvements. Increased traffic on the highway should not be permitted until improvements are made.</li> </ul>

Topic	What we Heard
<b>Heritage Resources</b>	<ul style="list-style-type: none"> <li>• Todagin Plateau has been used by Tahltans for millennia—we shouldn't be destroying that history.</li> <li>• TIA development looked like machines playing in a big sandbox—what happened to all of those archaeology sites?</li> </ul>
<b>Use of the Land and Resources for the exercise of Tahltan rights</b>	<ul style="list-style-type: none"> <li>• Negative effects of rotation work on Tahltan members' ability to participate in cultural and traditional activities (i.e. missing cultural events).</li> <li>• Loss of access to Todagin Mountain and surrounding area, which has been detrimental for Iskut harvesters ("there's nowhere as accessible to go now").</li> <li>• Reduced opportunities for Tahltan members to transfer knowledge to younger generations due to rotational work and unable to visit Red Chris area.</li> <li>• Risk of increased, long-term land alienation.</li> <li>• Concerns about long-term need for fencing around the existing pit and subsidence zone. Loss of area for use by Tahltan outfitters, and outfitting operations adjacent to mine, including impacts on business viability.</li> </ul>
<b>Social and Cultural Relationship to the Land and Each Other</b>	<ul style="list-style-type: none"> <li>• Risks that the Amendment may have impacts on water resources and their implications on associated habitats of cultural interest.</li> <li>• Out-migration of Tahltan members from local Tahltan communities, weakening community cohesion.</li> <li>• Negative effects of rotation work on community and family cohesion.</li> <li>• Negative effects of rotation work on Tahltan members' ability to participate in cultural and traditional activities (i.e., missing cultural events).</li> </ul>
<b>Peaceful Enjoyment of Land</b>	<ul style="list-style-type: none"> <li>• We have a responsibility to take care of the land as it takes care of us. We have to be out there and on the land to do that. Our concerns can't be addressed by the mining company—it's in our hearts</li> <li>• Potential effects to sense of enjoyment of Tahltan members in Kinaskan Lake Outfitters from sensory disturbances from Amendment development activities.</li> <li>• Potential effects to sense of enjoyment of Tahltan members in Kinaskan Lake Outfitters from the auditory and visual impacts, changing hunting areas.</li> <li>• Families have wonderful memories of camping up where Red Chris is now. They feel devastated they cannot do that now, and it will never be the same.</li> </ul>
<b>Cumulative Effects</b>	<ul style="list-style-type: none"> <li>• Members sought clarification on what cumulative effects mean and how they were incorporated into the assessment.</li> <li>• Concerns on potential cumulative effects and potential effects on salmon, water, wildlife, communities and Tahltan way of life.</li> <li>• Members recommended undertaking larger, territory-wide cumulative effects studies and expressed interest in having Newmont participate in those efforts.</li> </ul>

Topic	What we Heard
<b>Employment and Economy</b>	<ul style="list-style-type: none"> <li>• Uncertainty about evolving workplace conditions and loss of employment with the use of increased automation for Block Cave.</li> <li>• Distribution of benefits to large and small Tahltan businesses (ensuring that any procurement benefits are shared equally).</li> <li>• Risk that increased workforce demands could diminish the local workforce.</li> <li>• Need training and funding so members can work in Block Cave</li> <li>• Concern that underground operations will reduce demand for Tahltan workers.</li> <li>• Tahltan members are not treated fairly as employees and should be—they need to be getting promotions and not experience racism.</li> <li>• Concerns about marshalling points and some Tahltan members not being able to travel to the mine easily with removal of the Prince George marshalling point.</li> </ul>
<b>Benefits</b>	<ul style="list-style-type: none"> <li>• Expression that communities don't see enough benefits from Red Chris.</li> <li>• Status of IBCA and if it will be renegotiated for Block Cave.</li> <li>• Questions related to potential for increased royalties, profit triggers, equity participation, tax free employment for members, and an improved IBCA.</li> <li>• With mining in the territory, resources for medical needs, housing, etc., should no longer be a challenge.</li> <li>• Accessing contracts should be open to non-TNDC local businesses and contractors.</li> <li>• How can legacies and benefits of the mine be carried forward for future generations?</li> <li>• Questions about distribution of benefits.</li> </ul>
<b>Mine Closure and Liability</b>	<ul style="list-style-type: none"> <li>• Who holds the closure bond? Is it secure, and should TCG hold the bond since the mine is in our territory forever?</li> <li>• Questions about who's monitoring legacy sites now on Tahltan territory</li> <li>• Questions about the permanent changes to land at the site and how it will be unusable for future generations.</li> <li>• How can there be a guarantee of long term benefit from the mine?</li> <li>• Why flood the pit and subsidence zone?</li> </ul>
<b>Additional Comments and Concerns</b>	<ul style="list-style-type: none"> <li>• Tahltan members and elders should be able to visit the site, learn about it.</li> <li>• Do tailings pipelines break and what are the implications?</li> <li>• Additional effects of the powerline to Red Chris</li> <li>• Concerns that Iskut experiences most of the impacts from Red Chris</li> </ul>

## 5.2 SUMMARY OF ALL TCG TAHLTAN ENGAGEMENT AND INFORMATION OPPORTUNITIES

Table 6 provides a list of all the TCG engagement and information sharing opportunities for Tahltan members during the implementation of the Declaration Act Agreement, Tahltan Risk Assessment and provincially-led EA.

**Table 6: TCG Member Engagement and Information Sharing Opportunities**

Phase	Date	Location	Engagement Activity	Outcome
Initiating the Assessment	June 6, 2023	Tat'ah - Dease Lake	TCG and NRCML facilitated meetings to provide Red Chris operational update and discuss tailings, environmental stewardship, the block cave mining technique, the future potential of Red Chris, and community investment.	The outcomes of this engagement supported early discussions on the proposed Block Cave Amendment, existing operational activities, and the anticipated influence of changes associated with the proposed block cave mining technique. They also informed and strengthened input and feedback on the Project Description
Initiating the Assessment	June 7, 2023	Tlégōhīn - Telegraph Creek	TCG and NRCML facilitated meetings to provide Red Chris operational update and discuss tailings, environmental stewardship, the block cave mining technique, the future potential of Red Chris, and community investment.	The outcomes of this engagement supported early discussions on the proposed Block Cave Amendment, existing operational activities, and the anticipated influence of changes associated with the proposed block cave mining technique. They also informed and strengthened input and feedback on the Project Description.
Initiating the Assessment	June 8, 2023	Łuwechōn - Iskut	TCG and NRCML facilitated meetings to provide Red Chris operational update and discuss tailings, environmental stewardship, the block cave mining technique, the future potential of Red Chris, and community investment.	The outcomes of this engagement supported early discussions on the proposed Block Cave Amendment, existing operational activities, and the anticipated influence of changes associated with the proposed block cave mining technique. They also informed and strengthened

Phase	Date	Location	Engagement Activity	Outcome
				input and feedback on the Project Description.
Initiating the Assessment	July 2, 2023	Tat'ah - Dease Lake	Provided information to Tahltan members on the Block Cave Amendment.	The engagement and information sharing at the Annual General Assembly provided an opportunity for TCG to understand Elders' and membership's early perspectives on the proposed Block Cave Amendment, including initial views on potential impacts and priorities. This session also supported the gathering of input and feedback on the Project Description.
Initiating the Assessment	October 23, 2023	Tat'ah - Dease Lake	Provided an update on the Red Chris Section 7 Agreement and its relevance for the Block Cave Amendment.	The TCG facilitated an engagement session to discuss the negotiation of the Red Chris Mine Declaration Act Agreement and to outline the process steps for the Tahltan Risk Assessment of the proposed Block Cave Amendment.
Initiating the Assessment	October 24, 2023	Tlĕgōhīn - Telegraph Creek	Provided an update on the Red Chris Section 7 Agreement and its relevance for the Block Cave Amendment.	The TCG facilitated an engagement session to discuss the negotiation of the Red Chris Mine Declaration Act Agreement and to outline the process steps for the Tahltan Risk Assessment of the proposed Block Cave Amendment.
Initiating the Assessment	October 25, 2023	Luwechōn - Iskut	Provided an update on the Red Chris Section 7 Agreement and its relevance for the Block Cave Amendment.	The TCG facilitated an engagement session to discuss the negotiation of the Red Chris Mine Declaration Act Agreement and to outline the process

Phase	Date	Location	Engagement Activity	Outcome
				steps for the Tahltan Risk Assessment of the proposed Block Cave Amendment.
Initiating the Assessment	November 29, 2023	Tlégōhīn - Telegraph Creek	Introduced Newmont as NRCML's new owner, and discussed the company's plans in BC, including the Block Cave Amendment, with community members.	TCG and NRCML facilitated an engagement session to introduce Newmont as the new majority owner of the Red Chris Mine. The outcomes of this session supported a clearer understanding of Tahltan membership's expectations for Newmont regarding the proposed transition from the open pit mine to underground block cave mining. The engagement also highlighted specific Tahltan membership interests, concerns, and values for incorporation into the Tahltan assessment process.
Initiating the Assessment	November 30, 2023	Łuwechōn - Iskut	Introduced Newmont as NRCML's new owner, and discussed the company's plans in BC, including the Block Cave Amendment, with community members.	TCG and NRCML facilitated an engagement session to introduce Newmont as the new majority owner of the Red Chris Mine. The outcomes of this session supported a clearer understanding of Tahltan membership's expectations for Newmont regarding the proposed transition from the open pit mine to underground block cave mining. The engagement also highlighted specific Tahltan membership interests, concerns, and values for incorporation into

Phase	Date	Location	Engagement Activity	Outcome
				the Tahltan assessment process.
Initiating the Assessment	December 1, 2023	Tat'ah - Dease Lake	Introduced Newmont as NRCML's new owner, and discussed the company's plans in BC, Block Cave Amendment, with community members.	TCG and NRCML facilitated an engagement session to introduce Newmont as the new majority owner of the Red Chris Mine. The outcomes of this session supported a clearer understanding of Tahltan membership's expectations for Newmont regarding the proposed transition from the open pit mine to underground block cave mining. The engagement also highlighted specific Tahltan membership interests, concerns, and values for incorporation into the Tahltan assessment process.
Initiating the Assessment	March 6, 2024	Tlégōhīn - Telegraph Creek	TCG and NRCML facilitated a session to continue discussions on the proposed Block Cave Amendment, including how block caving works, the potential environmental benefits of block caving, the workforce transition, and the assessment and permitting processes.	The outcomes of TCG's engagement with NRCML supported the collection of feedback, interests, and guidance to inform the development of procedural requirements for the Amendment Application Information Requirements.
Initiating the Assessment	March 7, 2024	Łuwechōn - Iskut	TCG and NRCML facilitated a session to continue discussions on the proposed Block Cave Amendment, including how block caving works, the potential environmental benefits of block caving, the workforce transition, and the assessment and permitting processes.	The outcomes of TCG's engagement with NRCML supported the collection of feedback, interests, and guidance to inform the development of procedural requirements for the Amendment Application Information Requirements.

Phase	Date	Location	Engagement Activity	Outcome
Initiating the Assessment	March 23, 2024	Whitehorse	TCG and NRCML provided information on the proposed Block Cave Amendment to Tahltan members, including a block cave overview video, in an open house format.	During the open house, TCG and NRCML received feedback and direction from Tahltan members regarding the Block Cave Amendment. This input informed TCG's recommendations for the development of the Amendment Application Information Requirements.
Amendment Application Information Requirements Development	June 25, 2024	Łuwechōn - Iskut	Block Cave Amendment project overview, Tahltan Risk Assessment process, and Tahltan feedback and input into the Tahltan Areas of Interest (AOIs) and Values.	The outcomes of TCG's engagement with NRCML supported the collection of feedback, interests, and guidance to inform the development of procedural requirements for the Amendment Application Information Requirements.
Amendment Application Information Requirements Development	June 26, 2024	Tlĕgōhīn - Telegraph Creek	Block Cave Amendment project overview, Tahltan Risk Assessment process, and Tahltan feedback and input into the Tahltan AOIs and Values.	The outcomes of TCG's engagement with NRCML supported the collection of feedback, interests, and guidance to inform the development of procedural requirements for the Amendment Application Information Requirements.
Amendment Application Information Requirements Development	June 27, 2024	Tat'ah - Dease Lake	Block Cave Amendment project overview, Tahltan Risk Assessment process, and Tahltan feedback and input into the Tahltan AOIs and Values	The outcomes of TCG's engagement with NRCML supported the collection of feedback, interests, and guidance to inform the development of procedural requirements for the Amendment Application Information Requirements..
Amendment Application Information	August 12, 2024	Virtual Open House	A website was made available for public viewing containing key information on the Block Cave	This created an opportunity for Tahltan members to access information about

Phase	Date	Location	Engagement Activity	Outcome
Requirements Development			Amendment. NRCML posted links to the virtual open house on its website and social media platforms (LinkedIn and Facebook).	the Block Cave Amendment through virtual online platforms, further supporting their ability to review materials and submit feedback.
Amendment Application Development	December 8, 2024	Tlĕgōhĭn - Telegraph Creek	Provided an update on the Block Cave Amendment to Tahltan community members, including the assessment processes, key project components, and workforce transition.	During the engagement session and feedback opportunity on the development of the Amendment Application, TCG received important feedback and direction from Tahltan members regarding the Block Cave Amendment.
Amendment Application Development	December 9, 2024	Łuwechōn - Iskut	Provided an update on the Block Cave Amendment to Tahltan community members, including the assessment processes, key project components, and workforce transition.	During the engagement session and feedback opportunity on the development of the Amendment Application, TCG received important feedback and direction from Tahltan members regarding the Block Cave Amendment.
Amendment Application Development	December 10, 2024	Tat'ah - Dease Lake	Provided an update on the Block Cave Amendment to Tahltan community members, including the assessment processes, key project components, and workforce transition.	During the engagement session and feedback opportunity on the development of the Amendment Application, TCG received important feedback and direction from Tahltan members regarding the Block Cave Amendment.
Amendment Application Review	February 25, 2025	Łuwechōn - Iskut	TCG and NRCML facilitated engagement sessions and presented information on the Amendment Application to gather feedback on the outcomes, respond to technical questions, and provide additional details	During the engagement sessions and feedback opportunities on the Amendment Application, TCG received important feedback and direction from Tahltan members regarding

Phase	Date	Location	Engagement Activity	Outcome
			regarding the Block Cave Amendment. Tahltan members were encouraged to submit written feedback, as well as to ask questions and provide comments directly during each engagement session.	the predicted effects of the Block Cave Amendment. This input informed TCG's determination to accept the Amendment Application for review on May 29, 2025.
Amendment Application Review	February 26, 2025	Tat'ah - Dease Lake	TCG and NRCML facilitated engagement sessions and presented information on the Amendment Application to gather feedback on the outcomes, respond to technical questions, and provide additional details about the Block Cave Amendment. Tahltan members were encouraged to submit written feedback, as well as to ask questions and provide comments directly during each engagement session.	During the engagement sessions and feedback opportunities on the Amendment Application, TCG received important feedback and direction from Tahltan members regarding the predicted effects of the Block Cave Amendment. This input informed TCG's determination to accept the Amendment Application for review on May 29, 2025.
Amendment Application Review	February 27, 2025	Tl̓gōh̓n - Telegraph Creek	TCG and NRCML facilitated engagement sessions and presented information on the Amendment Application to gather feedback on the outcomes, respond to technical questions, and provide additional details on the Block Cave Amendment. Tahltan members were encouraged to submit written feedback, as well as to ask questions and provide comments directly during each engagement session.	During the engagement sessions and feedback opportunities on the Amendment Application, TCG received important feedback and direction from Tahltan members regarding the predicted effects of the Block Cave Amendment. This input informed TCG's determination to accept the Amendment Application for review on May 29, 2025.
Amendment Application Review	March 18, 2025	Virtual - Tahltan Family Information Session	The TCG Lands Director joined an evening virtual engagement session with the Etheni Family, presenting on the status of the Block Cave Amendment, the outcomes of the Amendment	The engagement provided feedback and input on the outcomes of the Amendment Application Review, preliminary mitigations and strategies,

Phase	Date	Location	Engagement Activity	Outcome
			Application Review, preliminary mitigations and strategies, and the feedback received from Tahltan membership during the Application Review Phase.	and informed the Application Review Phase.
Amendment Application Review	March 21, 2025	Whitehorse	The Whitehorse open house provided Tahltan members with another opportunity to review the outcomes of the technical review of the Amendment Application, discuss TCG and THREAT perspectives on key technical issues and uncertainties, and provide feedback on the Block Cave Amendment. Poster boards, information packages, and handouts on the Tahltan Risk Assessment process, Tahltan Values, assessment boundaries, and TCG/THREAT technical review findings were displayed and discussed throughout the full-day session.	During the engagement session, TCG received important feedback and direction from Tahltan members regarding the Block Cave Amendment and the Amendment Application Review. This input informed TCG's determination to accept the Amendment Application for review on May 29, 2025.
Amendment Application Review	March 22, 2025	Whitehorse	The Whitehorse open house provided Tahltan members with another opportunity to review the outcomes of the technical review of the Amendment Application, discuss TCG and THREAT perspectives on key technical issues and uncertainties, and provide feedback on the Block Cave Amendment. Poster boards, information packages, and handouts on the Tahltan Risk Assessment process, Tahltan Values, assessment boundaries, and TCG/THREAT technical review findings were displayed and discussed throughout the full-day session.	During the engagement session, TCG received important feedback and direction from Tahltan members regarding the Block Cave Amendment and the Amendment Application Review. This input informed TCG's determination to accept the Amendment Application for review on May 29, 2025.

Phase	Date	Location	Engagement Activity	Outcome
Amendment Application Review	April 2, 2025	Virtual – Online	TCG participated in a BCEAO-facilitated online session to provide information about the proposed Block Cave Amendment, share findings from the Amendment Application, and respond to questions. The session was open to all members of the public, including Tahltan members.	BCEAO Virtual Information Session.
Amendment Application Review	April 8, 2025	Tlégōhīn - Telegraph Creek	TCG facilitated engagement sessions and presented further information on the Amendment Application to gather feedback on the findings in the Amendment Application, respond to technical questions, and provide additional details about the Block Cave Amendment. TCG provided information packages for Tahltan members to review, and members were encouraged to submit written feedback as well as ask questions and provide comments directly during each engagement session.	During the engagement session, TCG received important feedback and direction from Tahltan members regarding the Block Cave Amendment and the Amendment Application Review. This input informed TCG's determination to accept the Amendment Application for review on May 29, 2025.
Amendment Application Review	April 9, 2025	Tat'ah - Dease Lake	TCG facilitated an engagement session and presented further information on the Amendment Application to gather feedback on the findings in the Amendment Application, respond to technical questions, and provide additional details about the Block Cave Amendment. TCG provided information packages for Tahltan members to review and members were encouraged to submit written feedback, as well as to ask questions and provide comments directly during each engagement session.	During the engagement session, TCG received important feedback and direction from Tahltan members regarding the Block Cave Amendment and the Amendment Application Review. This input informed TCG's determination to accept the Amendment Application for review on May 29, 2025.

Phase	Date	Location	Engagement Activity	Outcome
Amendment Application Review	April 10, 2025	Łuwechōn - Iskut	TCG facilitated an engagement session and presented further information on the Amendment Application to gather feedback on the findings in the Amendment Application, respond to technical questions, and provide additional details about the Block Cave Amendment. TCG provided information packages for Tahltan members to review and members were encouraged to submit written feedback, as well as to ask questions and provide comments directly during each engagement session.	During the engagement session, TCG received important feedback and direction from Tahltan members regarding the Block Cave Amendment and the Amendment Application Review. This input informed TCG's determination to accept the Amendment Application for review on May 29, 2025.
Amendment Application Review	May 23, 2025	Tlĕgōhĭn - Telegraph Creek	TCG and NRCML facilitated a session to provide an update on the Block Cave Amendment to Tahltan community members and to respond to frequently asked questions from previous meetings. Topics covered included employment and business opportunities, traffic, TIA (Tailings Impoundment Area) considerations, and environmental enhancements at the site.	During the engagement session, TCG received important feedback and direction from Tahltan members regarding the Block Cave Amendment and the Amendment Application Review. This input informed TCG's determination to accept the Amendment Application for review on May 29, 2025.
Amendment Application Review	May 24, 2025	Tat'ah - Dease Lake	TCG and NRCML facilitated a session to provide an update on the Block Cave Amendment to Tahltan community members and to respond to frequently asked questions from previous meetings. Topics covered included employment and business opportunities, traffic, TIA (Tailings Impoundment Area) considerations, and environmental enhancements at the site.	During the engagement session, TCG received important feedback and direction from Tahltan members regarding the Block Cave Amendment and the Amendment Application Review. This input informed TCG's determination to accept the Amendment Application for review on May 29, 2025.

Phase	Date	Location	Engagement Activity	Outcome
Tahltan Risk Assessment / Effects Assessment	July 3, 2025	Tat'ah - Dease Lake	TCG provided the Tahltan Elders Council with an update on the Block Cave Amendment, an overview of the Tahltan Risk Assessment process and framework, timelines for the Tahltan Risk Assessment, the steps outlined in the Declaration Act Agreement, and potential Tahltan conditions being developed for the Block Cave Amendment. TCG also shared key outcomes from the Amendment Application Review.	The engagement session with Tahltan Elders provided an important opportunity for TCG to understand Elders' perspectives on the outcomes of the Application Review and Acceptance, the early findings of the Tahltan Risk Assessment, and the potential Tahltan conditions under consideration. The feedback and input gathered during this full-day session directly supported TCG in advancing the drafting of the Tahltan Risk Assessment.
Tahltan Risk Assessment / Effects Assessment	July 4, 2025	Tat'ah - Dease Lake	TCG provided the Tahltan membership at the Annual General Assembly with an update on the Block Cave Amendment, an overview of the Tahltan Risk Assessment process and framework, timelines for the Tahltan Risk Assessment, the steps outlined in the Declaration Act Agreement, and potential Tahltan conditions under consideration. TCG also shared key outcomes from the Amendment Application Review.	The presentations with Tahltan members during the Annual General Assembly provided an important opportunity for TCG to hear directly from membership on the outcomes of the Application Review, the early findings of the Tahltan Risk Assessment, and the potential Tahltan conditions under consideration. The feedback, guidance, and questions received during this session meaningfully supported TCG in advancing the drafting and refinement of the Tahltan Risk Assessment, ensuring it reflected the interests, concerns, and priorities expressed by Tahltan members.
Tahltan Risk Assessment	July 4, 2025	Tat'ah - Dease Lake	TCG Lands Department facilitated an engagement booth where Tahltan members could stop by to	The engagement booth facilitated by the TCG Lands Department during the AGA

Phase	Date	Location	Engagement Activity	Outcome
/ Effects Assessment			receive information packages on the Block Cave Amendment, view project-related videos, ask questions, seek clarification, and provide feedback to support the ongoing development of the Tahltan Risk Assessment.	provided members with dedicated opportunities to receive project information, view explanatory videos, ask questions, seek clarification, and share feedback. The input gathered through these booth interactions directly contributed to the continued refinement and drafting of the Tahltan Risk Assessment, ensuring that community perspectives and knowledge were incorporated into TCG's assessment.
Tahltan Risk Assessment / Effects Assessment	July 5, 2025	Tat'ah - Dease Lake	TCG Lands Department facilitated an engagement booth where members could stop by to receive information packages on the Block Cave Amendment, view project-related videos, ask questions, seek clarification, and provide feedback to support the ongoing development of the Tahltan Risk Assessment.	The engagement booth facilitated by the TCG Lands Department during the AGA provided members with dedicated opportunities to receive project information, view explanatory videos, ask questions, seek clarification, and share feedback. The input gathered through these booth interactions directly contributed to the continued refinement and drafting of the Tahltan Risk Assessment, ensuring that community perspectives and knowledge were incorporated into TCG's assessment.
Tahltan Risk Assessment / Effects Assessment	July 6, 2025	Tat'ah - Dease Lake	TCG Lands Department facilitated an engagement booth where members could stop by to receive information packages on the Amendment, view project-related videos, ask questions, seek clarification, and provide feedback	The engagement booth facilitated by the TCG Lands Department during the AGA provided members with dedicated opportunities to receive Amendment information, view

Phase	Date	Location	Engagement Activity	Outcome
			to support the ongoing development of the Tahltan Risk Assessment.	explanatory videos, ask questions, seek clarification, and share feedback. The input gathered through these booth interactions directly contributed to the continued refinement and drafting of the Tahltan Risk Assessment, ensuring that community perspectives and knowledge were incorporated into TCG's assessment.
Tahltan Risk Assessment / Effects Assessment	March 3, 2026	Luwecōn - Iskut	This set of TCG-led sessions, with NRCML in attendance, provided Tahltan members with information on the Tahltan Risk Assessment methodology; the assessment areas and sources of Tahltan Knowledge; potential effects from the Block Cave Amendment; proposed mitigations by NRCML; proposed potential Tahltan conditions; and an overview of the next steps in the Tahltan Risk Assessment process. Together, these engagements offered Tahltan members the opportunity to review the draft outcomes, ask questions, and provide feedback to further inform the continued development and refinement of the Tahltan Risk Assessment by TCG.	The feedback, questions, and perspectives shared during these engagements informed the overall assessment findings, supported the development of the final set of recommended Tahltan conditions, and contributed to the overall conclusions of the Tahltan Risk Assessment.
Tahltan Risk Assessment / Effects Assessment	March 4, 2026	Tat'ah - Dease Lake	This set of TCG-led sessions, with NRCML in attendance, provided Tahltan members with information on the Tahltan Risk Assessment methodology; the assessment areas and sources of Tahltan Knowledge; potential effects from the Block Cave Amendment;	The feedback, questions, and perspectives shared during these engagements informed the overall assessment findings, supported the development of the final set of recommended Tahltan

Phase	Date	Location	Engagement Activity	Outcome
			<p>proposed mitigations by NRCML; proposed potential Tahltan conditions; and an overview of the next steps in the Tahltan Risk Assessment process. Together, these engagements offered Tahltan members the opportunity to review the draft outcomes, ask questions, and provide feedback to further inform the continued development and refinement of the Tahltan Risk Assessment by TCG.</p>	<p>conditions, and contributed to the overall conclusions of the Tahltan Risk Assessment.</p>
Tahltan Risk Assessment / Effects Assessment	March 5, 2026	Tlĕgōhĭn - Telegraph Creek	<p>This set of TCG-led sessions, with NRCML in attendance, provided Tahltan members with information on the Tahltan Risk Assessment methodology; the assessment areas and sources of Tahltan Knowledge; potential effects from the Block Cave Amendment; proposed mitigations by NRCML; proposed potential Tahltan conditions; and an overview of the next steps in the Tahltan Risk Assessment process. Together, these engagements offered Tahltan members the opportunity to review the draft outcomes, ask questions, and provide feedback to further inform the continued development and refinement of the Tahltan Risk Assessment by TCG.</p>	<p>The feedback, questions, and perspectives shared during these engagements informed the overall assessment findings, supported the development of the final set of recommended Tahltan conditions, and contributed to the overall conclusions of the Tahltan Risk Assessment.</p>
Tahltan Risk Assessment / Effects Assessment	April 7, 2026	Virtual - Online	<p>This set of TCG-led sessions, with NRCML in attendance, provided Tahltan members with information on the Tahltan Risk Assessment methodology; the assessment areas and sources of Tahltan Knowledge; potential effects from the Block Cave Amendment;</p>	<p>The feedback, questions, and perspectives shared during these engagements informed the overall assessment findings, supported the development of the final set of recommended Tahltan</p>

Phase	Date	Location	Engagement Activity	Outcome
			proposed mitigations by NRCML; proposed potential Tahltan conditions; and an overview of the next steps in the Tahltan Risk Assessment process. Together, these engagements offered Tahltan members the opportunity to review the draft outcomes, ask questions, and provide feedback to further inform the continued development and refinement of the Tahltan Risk Assessment by TCG.	conditions, and contributed to the overall conclusions of the Tahltan Risk Assessment.
Tahltan Risk Assessment / Effects Assessment	April 21, 2026	Virtual – Online	NRCML Tahltan Risk Assessment Membership Summary Report released for Tahltan membership	The final draft Tahltan Risk Assessment was shared with Tahltan membership to review the outcomes of the assessment findings, the recommended Tahltan and EAO conditions, and the overall conclusions of the Tahltan Risk Assessment.

### 5.3 HOW TAHLTAN ENGAGEMENT INFORMS THIS REPORT

The TCG Lands & Regulatory Affairs Department and the THREAT Team are responsible for safeguarding the rights and interests of all Tahltan members, and all feedback received through these engagements played a critical role in informing every component of this Tahltan Risk Assessment.

As detailed in the section above, TCG conducted community and membership engagement throughout the Tahltan Risk Assessment process, including in person, across Tahltan communities and through virtual sessions and information sharing opportunities. These engagements were commensurate with the scale of the proposed Block Cave Amendment, and designed to meet the requirements of the Declaration Act Agreement and to inform the Tahltan Risk Assessment for the Amendment. Engagement activities supported scoping of Tahltan Values and Areas of Interest, development of the Amendment Application, implementation of process steps, the identification of perspectives, expectations and concerns to be considered in the Tahltan Risk Assessment, and ultimately the findings in this Tahltan Risk Assessment Report. Members also provided input and recommendations that contributed to the development and refinement of potential Tahltan condition recommendations to address Tahltan interests, concerns and potential effects from the Block Cave Amendment.

## 6 Results of Other Engagement

### 6.1 SUMMARY OF OTHER ENGAGEMENT

NRCML and the EAO conducted other engagements throughout the EA process to keep various public organizations, governments, academic institutions, community organizations, other First Nations and business

groups updated on the Amendment and to obtain feedback on concerns. These engagements are detailed in the EAO Assessment Report and the Amendment Application materials. Tahltan’s involvement with the public engagement was limited to participation in the Virtual Information Session, including answering questions posed to TCG, hosted by the EAO on April 2, 2025. Where feedback was provided by public organizations, governments, academic institutions, community organizations, other First Nations and business groups through these engagement processes, TCG considered the relevant information to support the preparation of this Tahltan Risk Assessment Report.

## 6.2 HOW OTHER ENGAGEMENT INFORMS THIS REPORT

The Tahltan Risk Assessment recognizes the importance of ensuring transparency, accountability, and administrative fairness, and the need to consider public and other concerns and feedback in relation to the Block Cave Amendment. The Tahltan Risk Assessment Report considers the results of this other engagement through the findings and recommendations of the EAO’s Assessment Report.

# 7 Results of Consensus Seeking Between TCG and EAO

## 7.1 SUMMARY OF CONSENSUS SEEKING EFFORTS BETWEEN TCG AND EAO

On November 1, 2023, TCG and BC entered into the second consent-based decision-making agreement under the Declaration on the Rights of Indigenous Peoples Act for the Red Chris Mine, known as the Declaration Act Agreement. The Declaration Act Agreement includes provisions for TCG and the EAO to each conduct their own assessments of the Block Cave Amendment and to work collaboratively throughout their assessments to identify and seek to achieve consensus on the information and assessment requirements required to support their respective decision-making processes. As per the Declaration Act Agreement, the Collaboration Team has worked together throughout the assessments and sought consensus at key decision points. Key issues, viewpoints, and decision points were tracked using an internal consensus tracking tool, while formal indications of consensus were shared via email or letter between the EAO and TCG and decisions were shared with NRCML. A summary of formal consensus points is provided in Table 7.

### 7.1.1 How Consensus Seeking Between TCG and EAO Informs This Report

The coordinated efforts by TCG and the EAO to track concerns and seek consensus have supported a collaborative approach to building a comprehensive assessment process and ensuring that the Declaration Act Agreement requirements have been met in the delivery of both parties’ assessments. This work has been undertaken in a respectful manner that recognizes and incorporates the worldviews, perspectives, laws, and stewardship principles of both governments. Consensus-seeking has also extended to coordination with provincial ministries involved in overlapping permitting processes to determine how TCG’s concerns, and potential conditions, meaningfully inform permitting processes. See further information about consensus seeking between TCG and the EAO in Table 7.

**Table 7: Consensus Seeking Summary**

Declaration Act Agreement Commitments	Assessment Stage	Engagement Activity	Outcome
4.6 a-f	Project Description Review, Scope of the Agreement and TCG Consent	Engagement by NRCML with TCG leadership and THREAT technical reviewers to describe Amendment throughout 2023, culminating in the revised Project Description submission.  Engagement between TCG and BC to confirm a complex amendment and substantial	Upon review of the Project Description, EAO confirmed the Project is considered a “Complex Amendment” under the BC EA Act 2018, and BC and TCG agree the Amendment constitutes a “Substantial Change” under the Declaration Act Agreement, thus requiring a Tahltan Risk Assessment.

Declaration Act Agreement Commitments	Assessment Stage	Engagement Activity	Outcome
		change as per the Declaration Act Agreement.	
7.11	Confirmation of Sufficiency of Information in the Project Description and Scope of the Assessment.	<p>THREAT and Newmont engaged on both preliminary and revised Project Descriptions. TCG/THREAT submitted detailed technical questions on the revised Project Description and received responses. A number of engagements with TCG leadership and TCG member engagements were hosted in Tahltan Territory to share Amendment information and plans (see Table 6).</p> <p>TCG and BC engaged intensively in consideration of NRCML input and Tahltan concerns to confirm the scope of the amendment given the realities of the operating mine and existing permits, desired NRCML timelines and scope, and Tahltan concerns.</p>	TCG sent correspondence on May 17, 2024, and the EAO responded May 21, 2024, confirming that consensus was reached and there is sufficient information to proceed to drafting the Amendment Procedures and the Amendment Application Information Requirements
7.20	Drafting the Amendment Procedures and the AAIR	<p>Amendment procedures were drafted by the EAO and reviewed iteratively by TCG/THREAT until consensus was reached on their contents.</p> <p>The AAIR were drafted by NRCML and submitted to EAO and TCG for review. The AAIR underwent two rounds of formal technical review and issues resolution before TCG and EAO, considering input from NRCML and Tahltan member engagement, and engagement with BC permitting representatives, reached consensus on the final AAIR issued to Newmont.</p> <p>NRCML engaged with TCG leadership and TCG members to inform the AAIR as per Table 6. TCG engaged with Tahltan members through in-person engagement sessions on the AAIR, particularly Chapter 4, to guide the Tahltan Risk Assessment, as described in Table 6.</p>	<p>Following notification of each other and consensus on procedures reached, TCG and EAO jointly issued the Amendment Procedures to NRCML August 29, 2024</p> <p>Following notification of each other and consensus on the AAIR reached, TCG and EAO jointly issued the AAIR to NRCML November 19, 2024.</p>

Declaration Act Agreement Commitments	Assessment Stage	Engagement Activity	Outcome
7.29	Adequacy of Amendment Application	<p>The Amendment Application was submitted Dec. 13, 2024 and underwent two Rounds of formal review by BC and TCG/THREAT, followed by issues resolution. Chapter 4 was amended by NRCML from its original version and with support and input from TCG/THREAT and was re-submitted Dec. 27, 2025.</p> <p>NRCML engaged with TCG leadership and TCG members on the contents and findings of the Amendment Application as per Table 6. TCG engaged with Tahltan members through in-person engagement sessions on the contents and findings of the Amendment Application, particularly Chapter 4, as described in Table 6.</p> <p>TCG and EAO engaged intensively, with input from NRCML and in consideration of Tahltan member input, before determining adequacy and with the understanding that further information could be requested from NRCML during the Assessment phases, and further work with permitting agencies would progress.</p>	Following notification of each other and consensus on adequacy reached, TCG and BC jointly issued notice to NRCML that the Amendment Application, including all supplemental materials, was adequate to inform the EAO Assessment and Tahltan Risk Assessment on May 29, 2025.
7.37, 7.38, 7.40, 7.41-7.43, 7.44, 7.48, 7.49	Effects Assessments	A first, incomplete draft EAO Assessment Report was shared with TCG/THREAT in two parts, June 27 <sup>th</sup> and July 4, 2025. The drafts underwent two rounds of review, updating, and issues resolution with a more complete draft shared Nov. 14, 2025. More comprehensive conditions were shared with NRCML throughout Assessment review, including in Dec, 2025 and Feb., 2026. The final EAO Assessment Report and full draft referral package was shared with TCG Lands and NRCML on April 2, 2026, with some wording updated to reach consensus on the final draft conditions and draft referral materials by April 28, 2026.	Consensus on the draft referral package to be submitted to the TCG Board to inform their Consent Decision was reached April 28, 2026. All materials were forwarded to the TCG Board April 29, 2026.

Declaration Act Agreement Commitments	Assessment Stage	Engagement Activity	Outcome
		<p>The initial draft Tahltan Risk Assessment was shared with NRCML and BC Feb. 20, 2026.</p> <p>Meetings to move to consensus on contents of the final Assessment reports and draft referral package occurred through to April 28, 2026.</p> <p>TCG engaged with Tahltan membership on the contents and findings of the Tahltan Risk Assessment through community meetings in March, 2026, and through release of a summary TRA on April 22, 2026. Tahltan member feedback was incorporated into the final TRA, submitted to the TCG Board April 29, 2026.</p>	
Part 8	Decision Making	Consent decision making week for the TCG Board is scheduled for May 4 – 8, 2026. Outcomes of the decision making process will be shared with the BCEAO as per the Declaration Act Agreement.	TCG Notice of Decision expected.

## 8 Results of Engagement with the Proponent

### 8.1 SUMMARY OF ENGAGEMENT WITH THE PROPONENT

Engagement between TCG and NRCML on the topic of converting the Red Chris Mine to Block Cave operations began well before initiation of the EA process, with the 2019 Amended and Restated IBCA explicitly contemplating the conversion to Block Cave. Engagement continued through early permitting processes, allowing construction of the Nagha Portal and the Exploration Decline, and the 2021 Pre-Feasibility Study. The EA process was initiated with submission of a Project Description to the EAO and TCG in February 2023 with an amended Project Description submitted in December 2023.

Since submission of the amended Project Description, technical engagement on the Block Cave Amendment has been continuous and comprehensive and has generally included:

- Weekly TCG/THREAT-NRCML meetings
- Bi-weekly tri-lateral meetings with TCG/THREAT, NRCML, and the BC EAO. BC permitting representatives joined when required
- Review by TCG/THREAT of materials referencing Traditional Knowledge as per the Knowledge Sharing Protocol before submission to the EAO (focused on Amendment Application submission and as required for any other official submissions)
- Targeted engagement with TCG/THREAT and other Tahltan representatives and Tahltan members to inform and complete the Social Baseline Study, appended to the Amendment Application, and the Human Health Risk Assessment (HHRA) and detailed Health Impact Assessment

- Continued engagement across all existing IBCA structures
- Continued operational engagements, including site visits, where matters relating to Block Cave were regularly discussed
- Sharing and commenting on technical materials as per the EAO's assessment process, including sharing of draft conditions as they were developed and finalized, and sharing of draft and final versions of this TRA Report (initial draft TRA shared with Newmont Feb. 20, 2026, draft conclusions shared April 22, 2026, final TRA shared April 28, 2026).

These engagements occurred alongside regular engagement with TCG and Band Leadership as per the IBCA and as needed to maintain relationships and address key issues, regular activities by NRCML staff including mine management and community relations teams, and the Tahltan-member engagements listed in Section 5.1.

## 8.2 HOW ENGAGEMENT WITH THE PROPONENT INFORMS THIS REPORT

Early and continuous engagement between TCG, THREAT, and NRCML, was essential and integral throughout all stages of the Tahltan Risk Assessment and development of this report. Intensive technical engagement was required for TCG and THREAT to fully understand the proposed Block Cave Amendment and for NRCML to fully understand Tahltan's assessment needs and requirements. Engagement further supported the technical reviews and was required to address outstanding THREAT and Tahltan member questions and concerns. Intensive bi-lateral engagement on the IBCA Addendum allowed for issues to be addressed outside the BC regulatory process, where appropriate, while tri-lateral engagements including BC representatives throughout the EA and permitting formed the backbone of the assessment and supported consensus seeking on recommended terms and conditions.

NRCML-Tahltan engagement has been positive, respectful, and collaborative throughout. NRCML has been open and responsive to Tahltan concerns, and supportive of timing and capacity constraints when they occurred. Following TCG's decision making in relation to the Block Cave Amendment, considerable future collaboration is expected and required no matter the development path of the Red Chris Mine and will only be stronger based on the relationships established through the EA and Tahltan Risk Assessment processes.

# 9 Risk Assessment

Section 9 encompasses the six steps taken to assess effects of the proposed Block Cave Amendment, as detailed in Section 3.9 and depicted in Figure 4. The methodology is designed to holistically assess effects of the Block Cave Amendment on Tahltan and to conclude on the overall significance of effects, after considering all mitigation measures and recommended terms and conditions.

The Tahltan Risk Assessment Methodology is comprised of six steps:

1. Step 1 of the Tahltan Risk Assessment process considers the condition and context of Tahltan Areas of Interest (AOIs) across the Tahltan Continuum *without* the proposed Block Cave Amendment to establish an understanding of the baseline conditions across time.
2. Step 2 identifies expected positive and negative effects from the proposed Block Cave Amendment based on information provided in the Amendment Application, supplemental materials, and engagement with Tahltan members.
3. Step 3 assesses the severity of negative effects on Tahltan Values identified in Step 2, taking into account NRCML's proposed mitigation measures. For a more holistic analysis, the severity of effects is also assessed by considering the condition of Tahltan Core Priorities per AOI and across the Tahltan Continuum as was done in Step 1, but this time considering the impacts of the proposed Block Cave Amendment.
4. In Step 4, preliminary significance of effects is determined by considering the Block Cave Amendment and its potential effects as identified in Steps 2 and 3 against the Tahltan Risk Assessment Factors, the Tahltan Sustainability Requirements, and the views of Tahltan members.
5. Once the preliminary significance of effects from the Block Cave Amendment is determined, recommended terms and conditions are identified in Step 5 for addressing significant effects.
6. Step 6 contains final conclusions on the significance of effects, considering proposed mitigation measures and recommended terms and conditions.

To support navigation through the steps of the assessment, the steps are summarized in the process diagram below. This diagram is included at the beginning of each step of the assessment to track progress through the methodology.



**9.1 STEP 1: WHAT IS THE CONDITION OF TAHLTAN LANDS, CULTURE, AND COMMUNITIES?**

Section 9.1 describes the Tahltan AOIs across multiple scales of assessment to ensure a holistic assessment of the proposed Block Cave Amendment that aligns with geographic scales important to Tahltan. It further describes the context of the AOIs across the Tahltan Continuum, without considering potential effects from the Block Cave Amendment and alignment with the Tahltan Stewardship Plan.

Step 1 describes the conditions and context of AOIs over the Tahltan Continuum, in order to benchmark and assess specific effects from the proposed Block Cave Amendment in the subsequent stages in the Tahltan Risk Assessment. A number of Tahltan AOIs and Tahltan Values have already been impacted by cumulative stressors over time, including from the existing Red Chris mine. The evaluation of existing conditions identifies the vulnerability and additional effects from the proposed Amendment to the AOIs. The specific effects of the Block Cave Amendment are considered in subsequent steps by assessing the Amendment effects as additive to the context established in Section 9.1.



**9.1.1 Scales of Assessment**

As determined in Tahltan’s Impact Assessment Policy approved by the TCG Board on November 30, 2022, the assessment of a project across different spatial scales is necessary to understand the interconnectedness of potential impacts to Tahltan, including the inextricable relationship among Tahltan people, Tahltan’s way of life, Tahltan Territory, lands, waters, and all resources and creatures within Tahltan Territory. For this Block Cave Amendment assessment, design of the AOIs captured different scales of assessment by considering regional, landscape, and mine-site specific AOIs. Analyzing effects across multiple scales captures important Tahltan considerations and connections.

Tahltan Knowledge spatial information is not just a site, a line, or traditional use area. In discussions with Tahltan hunters and elders, they explain that a hunting site such as a camp represents a day or two’s distance or area of influence where Tahltan hunt and return or travel to the next camp.

A cabin represents a larger area of connection and use, and a village site is even larger than a cabin, given the multitude of individuals, trade, social, cultural, community, and sharing. Cabin and village sites can represent seasonal importance, a higher density and magnitude of importance.

A hunting or trapping use area relates to interconnection to the living and spiritual beings in the area, their use in and about the area, and the seasonal importance to both Tahltan and the beings can be larger in influence than the use area on a map or in a report.

Application of Tahltan Knowledge requires being grounded in the fundamental value of oneness or interconnectedness of all things, requiring a holistic perspective. One must understand Tahltan Knowledge cumulatively and at site specific, landscape, regional, and territorial scales across time. Recognition of ahī means that long-term future consequences have to be taken into account. Interpretation of Tahltan Knowledge to inform the Tahltan Risk Assessment was undertaken by TCG. This can result, for example, a site-specific impact has the potential to reverberate across some or all scales of assessment. Disrupting the relationship between these interdependent parts can upset the balance and magnify an effect that may initially seem limited. (not sure this last sentence is needed since it is the next section).

### 9.1.2 Areas of Interest (AOIs)

The TCG Lands Department identified seven AOIs to examine effects of the Block Cave Amendment. The AOI assessment boundaries were defined and designated by the TCG Lands Department through examining Tahltan Knowledge and records of Tahltan use and values across the Tahltan Continuum and capturing Tahltan concerns related to potential effects from the Block Cave Amendment. The AOIs define areas within which effects to Tahltan Values can be holistically and cumulatively examined to assess effects to Tahltan Values and Core Priorities, and to consider the Block Cave Amendment in relation to the Tahltan Risk Assessment Factors and Tahltan Sustainability Requirements. The AOIs Table 8 below.

### 9.1.3 Tahltan Values

To support assessment of effects of the proposed Block Cave Amendment, Tahltan examined effects on specific Tahltan Values. The choice of Tahltan Values was informed by community input and Tahltan perspectives, but also developed to be able to use the western, scientific knowledge from the Amendment Application to support the Tahltan Risk Assessment. Different values were assessed in each AOI, corresponding with the focus and purpose of the AOI as described in Table 8. Within each AOI, interactions between values were considered to support a holistic perspective. The comprehensive list of Tahltan Values include: Groundwater; Surface Water; Terrain and Soils; Fish, Fish Habitat and Aquatic Resources; Vegetation and Ecosystem Services; Wildlife and Wildlife Habitat; Human Health; Heritage Resources; Use of the Land and Resources for the exercise of Tahltan Rights and Title; Social and Cultural Relationship to the Land and Each Other; Peaceful Enjoyment of Land; Infrastructure and Services; and, Employment and Economy.

**Table 8: List of Tahltan Areas of Interest and Purpose of each AOI**

Spatial Scales	Area of Interest	Primary Purpose
Regional scales	Regional Cumulative Effects AOI (Section 9.1.4.1)	Provide a comprehensive regional overview and consider impacts of the Block Cave Amendment in combination with other projects in Tahltan Territory, including several other potential major mine developments.
	Consent Area Cumulative Effects AOI (9.1.4.2)	Assess impacts in alignment with the spatial boundaries set out in the Declaration Act Agreement and focus on the cumulative impacts and interactions with past, present, and future projects at a smaller scale.
Landscape and Community scales	Communities AOI (9.1.4.3)	Assess effects felt at the community level and focus on the existing and potential effects to the communities as well as the social and cultural impacts for families and individuals living in the communities.
	Highways AOI (9.1.4.4)	Assess the potential effects of increases in traffic and highway use as a result of the Block Cave Amendment.
	Klappan River AOI (9.1.4.5)	Assess potential effects on an area of high Tahltan use and cultural importance, as well as ensure potential effects on the Klappan River are explicitly explored.
	Saddle and Klappan Range AOI (9.1.4.6)	Assess potential effects on an area of high Tahltan use and cultural importance that includes important and sensitive water bodies and high-altitude ecosystems.
Site specific scales	Red Chris Mine Site AOI (9.1.4.7)	Assess the effects of the Block Cave Amendment on the immediate and surrounding areas to the Red Chris Mine, including nearby waterbodies that have the potential to be affected.

### 9.1.4 Tahltan Stewardship Plan Direction for AOIs

The Tahltan Stewardship Plan (TSP) captures current community land use directions based on the ancient and historic ties to the land with current and future desired outcomes. Under the TSP, the AOIs for the Red Chris Mine TRA overlap a number of land management units. The following are the TSP management units and broad management directions for AOIs used in this TRA (Table 9).

**Table 9. Tahltan Stewardship Plan management directions for AOIs used in the Tahltan Risk Assessment**

<b>Tahltan Stewardship Plan Management Directions</b>	
Middle Iskut and Ningunsaw River	<ul style="list-style-type: none"> <li>• Maintain intact landscape from along Iskut River Large River Corridor from Iskut Lakes to Lower Iskut River</li> <li>• Recovery and restoring surface and groundwater, riparian habitats, valleys and industrial roads</li> <li>• Maintain healthy aquatic ecosystems and waterways</li> <li>• Maintain connection to high elevations from low valley bottoms</li> <li>• Support wildlife and fish habitat reclamation and enhancement</li> <li>• Protect Tahltan trails and archaeological sites and cultural areas</li> <li>• Protect Tahltans right to quiet enjoyment of the land and waters in these areas from industrial development</li> </ul>
Edoxtotene Management Area	<ul style="list-style-type: none"> <li>• Maintain healthy rivers, lakes and waterways</li> <li>• Manage the pace and scale of development and ensure all Tahltan values are protected</li> <li>• Protect Tahltan archaeological sites and cultural resources</li> <li>• Maintain healthy and intact wildlife habitat ranges</li> <li>• Ensure pristine and clean groundwater and surface water sources</li> <li>• Require Tahltan consent before any industrial development activities to move forward</li> <li>• Implement Tahltan Standards, conditions and objectives for any potential industrial activities proposed</li> <li>• Tahltan access and cultural activities on the land</li> <li>• Ensure Tahltan quiet enjoyment of the land and waters</li> <li>• Ensure that mining or energy-related project activities achieve the highest standards and conditions and provide economic and social benefit to Tahltans.</li> <li>• Implement flight path restrictions around Tahltan harvesting and cultural activities on the land.</li> </ul>
Klappan Range and Burrage Management Area	<ul style="list-style-type: none"> <li>• Maintain intactness of forests and watersheds by limiting new road development</li> <li>• Community desire to create a buffer management area around the Klappan Sacred Headwaters</li> <li>• Community food security and traditional gathering activities should be protected</li> <li>• Implement measures to protect Tahltan quiet enjoyment of the land and waters</li> <li>• Maintain healthy wildlife ecosystems and ranges</li> <li>• Focus on cultural practices and Tahltan harvesting and land use</li> <li>• Protect groundwater and surface water sources</li> </ul>

**Tahltan Stewardship Plan Management Directions**

	<ul style="list-style-type: none"> <li>• Limit industrial development activities managing pace and scale in this area</li> </ul>
<p>Lower Stikine and Iskut River Large River Corridor</p>	<ul style="list-style-type: none"> <li>• Maintain healthy salmon ecosystems and all ground and surface water sources that drain into the Lower Stikine and Iskut Rivers</li> <li>• Maintain intact and undisturbed rivers and coastal old growth rainforests</li> <li>• Maintain river corridor valleys and connections to high elevation areas</li> <li>• Ensure Tahltan trails and cultural heritage is protected for any disturbance</li> <li>• Reclaim and disturbance from roads or industry impacts on the Lower Stikine and Iskut River</li> <li>• Maintain and protect Tahltan fish camps and enforce Tahltan quiet enjoyment of the land and seasonality of cultural activities (e.g. helicopter flights paths during fish camps)</li> <li>• Restrict aerial flight paths and create exclusion and avoidance areas around Tahltan communities, cultural sites and fish camps</li> <li>• Track fishing going into tributaries and rivers off Lower Stikine and Iskut Rivers e.g. Scud, Chutine, Porcupine</li> <li>• Increase Tahltan education and youth and elder trips along the rivers and storytelling about Tahltan culture</li> <li>• Protect all groundwater and surface water sources and ensure clean pristine water for all living beings and communities</li> <li>• No road building or development along the Lower Stikine and Iskut Rivers</li> <li>• Increase fishery database and studies to go beyond Salmon stocks</li> <li>• Implement fire protection measures around cultural areas, fish camps and Tlĕgōhĭn - Telegraph Creek and Glenora</li> </ul>
<p>Łuwechōn Deferral Area</p>	<ul style="list-style-type: none"> <li>• Protect medicinal and traditional plants of importance (e.g. blueberries).</li> <li>• Maintain a 25–50 km protection buffer around community of Iskut; inside this area no new industrial development projects are permitted.</li> <li>• Establish community gun ranges and archery in Iskut area. Clear out traditional trails and keep them open for Tahltan use.</li> <li>• Restrict float planes on Kluachon Lake; plane traffic is a major disturbance for the community of Łuwechōn – Iskut.</li> <li>• Focus on resource and food security for current and future generations. Explore Tahltan-led recreation and tourism.</li> <li>• Protect culture camps, burial sites and traplines.</li> <li>• Support and protect ceremonial grounds for elders and places to practice medicine. Protect water sources and Łuwechōn – Iskut community watersheds.</li> </ul>

Tahltan Stewardship Plan Management Directions	
	<ul style="list-style-type: none"> <li>• Ensure quiet enjoyment of land and protect against overcrowding.</li> </ul>
Klappan Sacred Headwaters Protected and Conserved Area	<ul style="list-style-type: none"> <li>• Establish a long-term Tahltan (Indigenous) protected and conserved area (IPCA) for future generations.</li> <li>• No industrial development is supported in this area.</li> <li>• Protect this area at all costs.</li> <li>• Focus on creating opportunities for healing on the land for Tahltan members.</li> <li>• Support classroom and education programs for Tahltan youth.</li> <li>• Focus on culture camps and cabin building for Tahltan occupancy.</li> <li>• Manage aerial traffic in this area.</li> <li>• Look for opportunities to enhance traditional harvesting and gathering.</li> <li>• Re-establish healthy wildlife populations.</li> <li>• Restore and rehabilitate Klappan Rail Grade and past industrial impacts.</li> <li>• Explore developing a Tahltan lodge run by Tahltan people.</li> <li>• Protect all groundwater and surface water and ensure healthy watersheds, rivers and lakes.</li> <li>• Restrict aerial flight paths and create exclusion and avoidance areas around Tahltan communities, cultural sites and fish camps.</li> </ul>
Gnat Pass Wildlife Recovery and Food Security Area	<ul style="list-style-type: none"> <li>• Focus on building more cabins to enable Tahltan families to get back out on the land.</li> <li>• More protection is required in Kutcho, Wolverine and Turnagain areas.</li> <li>• Support predator control as necessary for thriving ungulate populations.</li> <li>• Employ controlled burning for habitat enhancement.</li> <li>• More support is needed for Tahltan trapping activities.</li> <li>• Lidar programs are necessary to ensure industry does not impact burial sites and archaeological sites.</li> <li>• Water source protection is required for communities, Tahltan use and all beings with no voice.</li> </ul>
Tat'ah Management Area	<ul style="list-style-type: none"> <li>• No jade mineral and placer mining activities are supported in the Tat'ah management area.</li> <li>• Focus on restoration and regeneration of legacy sites and impacts to lands and waters.</li> <li>• Protection of water sources is needed, both surface and groundwater.</li> <li>• Large scale mining is not supported in this area, specifically open-pit mining; underground mining should be allowed, but large tailings ponds remain a concern.</li> </ul>

Tahltan Stewardship Plan Management Directions	
	<ul style="list-style-type: none"> <li>• Focus on healthy and happy communities.</li> <li>• New community infrastructure and services are a requirement.</li> <li>• Prioritize gardening, gathering, harvesting and agriculture opportunities.</li> <li>• Focus on building more cabins to enable Tahltan families to get back out on the land.</li> <li>• Community watershed areas require protection.</li> <li>• Promote local wood production opportunities to support cultural cabin and camps.</li> </ul>
Tat'l'ah Large River Corridor	<ul style="list-style-type: none"> <li>• Focus on maintaining Tanzilla and Dease River corridors intact.</li> <li>• Recover and restore river valleys from placer mining impacts.</li> <li>• Protect Tahltan use, camps and enjoyment on the land.</li> <li>• Ensure the preservation of adequate harvesting and gathering areas and limit disturbance from industry.</li> <li>• Manage predators to protect moose.</li> <li>• Focus on invasive species management programs.</li> <li>• Ensure protections are in place for medicinal plants and country foods.</li> </ul>

### 9.1.5 Conditions of the AOIs Across the Tahltan Continuum

This section provides the context and conditions of each AOI across the Tahltan Continuum, without considering the potential effects of the Block Cave Amendment. For each AOI, an overall description and map is followed by a list of relevant Tahltan Values assessed for the AOI, narratives to describe the ancient and historic conditions of the AOI, and a description of the current and future projected conditions. Given the spatial overlap of AOIs and to avoid repetition, overarching information can largely be found in the description of the Regional Cumulative Effects AOI (9.1.5.1) and additional AOI-specific information is provided in each individual AOI section.

Information across AOIs was sourced mainly from the following documents:

- A Report on Tahltan Land Use and Occupancy in the Vicinity of the Red Chris Mine Project, Jones et. al. 2021 (on Behalf of the Tahltan Central Government), May 2021;
- Amendment Application; Chapter 4.0 Tahltan Risk Assessment Information Requirements, Newcrest Red Chris Mining Ltd, Revision 1 (May 23, 2025);
- Detailed Health Impact Assessment: Red Chris Mine, Newmont Red Chris Mining Ltd. (June 26, 2025);
- Tahltan members feedback and directions (see Section 5);
- Tahltan Ancestral Study database;
- Elders Council and community engagements;

#### 9.1.5.1 Regional Cumulative Effects (CE) AOI

Netce'nsta or Earth-Mother

*The Earth-Mother lives under the earth, and holds it up. The earth is like a crust or blanket spread out flat, and she is like a post that holds it up. Sometimes she gets tired and shifts her position; or sometimes the earth sags in some place where the weight is on it, and then she moves her arm to put it up. Then we have an earthquake. Earth-Mother is becoming older and weaker all the time, and by and by she will not be able to hold up the earth any longer.*

*Then it will fall into the water which is below the earth, and disappear. Once Earth-Mother told the people, "When you feel an earthquake, you must not be alarmed. It is only because I am a little tired, and am shifting my position. It is no sign that I am going to fall down, and that the earth will come to an end." Therefore people are not afraid of earthquakes.*

Our ancestors respected the land and passed it down to their children in much the same condition as they had found it. We must continue to protect and conserve the interconnected whole that is Keyeh. This means caring for the land as a whole and all of its interdependent parts, respecting the relationships that exist between different features of the land and the animals, plants, and spirits that inhabit it (ecosystems), including ourselves. It is thinking of the land in terms of cycles, shorter seasonal cycles and longer ecological cycles, and Tahltan have always understood that we need to live within those cycles by making our activities align with them as much as possible. On the other hand, we accept that we will never fully understand the land—the larger community of which Tahltan are only a small part. This means that we need to be humble and careful and never forget that there is always more to learn. This can happen, for instance, by focusing too much on one part of the land, forgetting that we need to view the land as a whole of interdependent parts that are in dynamic and constantly shifting relationships with one another. By disrupting the relationships between parts, in ways that we do not understand, we can upset the land's balance and bring about unanticipated consequences.

Climate change adds another dimension to existing cycles with reduced winter snowpack will lower water levels in our salmon-bearing rivers while raising water temperatures, with impacts on fish populations. Changes in precipitation patterns, along with warmer winters, mean that our forests are now subject to multiple stressors, including drought, pests, disease and wildfires, all of which reduce forest resilience. The gradual loss of glaciers will also mean less available water in summer months. It is unclear exactly how these changes will fully effect fish and wildlife populations, but climate change is included when considering the health of the land and Tahltan Values in a cumulative and holistic manner.

The importance of this part of the Territory has, in part, to do with the resources provided by the rivers, mountain, plateaus, and forests: debēhe (sheep), hodzih (caribou), kedā (moose), nust'ihe (marten), tsa' (beaver), tehjishe (mink), naghā (wolverine), sas and khoh (bear), isbā (mountain goat), ch'iyōne (wolf), tse'deḡ (fisher), tṣabā'e (trout) and dēk'āne (salmon). It was also the trade route that travelled up the rivers and trails (coast-interior trade network which stretched from the Pacific coast to the boreal forests east of the Rocky Mountains).

Tahltan land uses and practices includes villages, obsidian mining, trapping, gathering, harvesting, fishing, travel, placenames, and trails throughout the region. Tahltan infrastructure includes bridges, stream and river trails, villages, cabins, campsites, and hunting/fishing/trapping/gathering camp sites.

Tahltan frequently travelled back and forth between their villages on the Iskut and upper Nass and the tribal headquarters at the confluence of the Tūdeḡe chō (Stikine) and Tāhtān (Tahltan) rivers, using ancient trails that followed the course of rivers, including Treaty Creek, Ningunsaw River, Unuk River, Stikine, and the Iskut. Many elders with knowledge of this region were born in the villages of Caribou Hide and Metsantan where they first travelled these trails as children, going to Telegraph Creek in the summer to trade furs. Their accounts indicate that many important sites were located along the routes of the main trails. There are also a number of important travel corridors through the area. The "Old Tahltan" trail started on the Stikine River at Tahltan Village, followed the Klastline River to Kluachon Lake, then climbed to Summit Lake before descending to the Klappan River. From the Klappan River, it followed McEwan Creek eastwards to Cold Fish Lake, the Spatsizi Plateau and Metsantan Lake at the headwaters of the Stikine. Another important trail skirted the northeast flank of Mount Edziza and crossed the Klastline Plateau southwards until it descended to Kinaskan Lake.

Tahltan use and occupation in and around the AOI include Tahltan sacred areas, place names, trails, hunting areas, trapping areas, fishing locations, camps, villages, trading sites and knowledge of river courses. Existing archaeological sites in the region reveal a preponderance of obsidian. Obsidian from Edizā'e (Mount Edziza) has been mined by Tahltan since ancient times. The volcanic glass was critical in the manufacturing of sharp tools and weapons and was traded widely throughout the north.

Tahltan use and occupancy of the Edizā'e (Mount Edziza), Klastline Plateau, Todagin Plateau, and Tahltan community areas (Tlēgōhīn, Tat'ah, Łuwechōn, Tāhtān) going back to ancient times is well-documented and continues today. There are year-round village sites in the region, outside of the community areas that continued to be occupied in the early twentieth century. There are records with dozens of villages, traditional cabins, and campsites in the valleys and alongside creeks, and Tahltan trails crisscrossing the entire region. Most of the rivers, creeks, lakes and mountains in the area have Tahltan names. Archaeological sites recorded in the course of investigations carried out over the years confirm the ancient use and occupancy of this area by Tahltan.

Evidence of the importance of the area across the Tahltan Continuum, is the density, distribution, and sensitivities of the following Tahltan sites, trails, and use areas:

- 683 archaeological sites, which does not include the over 30 sites destroyed in the Black Lake area by the construction of the Red Chris Mine;
- Over 1,100 Tahltan sites;
- Over 28,000 km of trails; and
- Over 1,000 Tahltan use areas, including hundreds of village sites, cabins, camps, and burial places

There are sacred areas in the AOI with Edīzā'e (Mount Edziza), Klappan Sacred Headwaters, and Tenh Dzetle being some of the larger areas in the public domain, with a number of others used in this assessment but not available for public documents.

All of these represent the linkages to ancient and historic times, and support the importance for today and future generations.

The Regional CE AOI is the largest AOI and is essential in understanding the context of Tahltan's way of life. This AOI is roughly 3,034,724 ha and includes the communities of Tat'ah- Dease Lake, Tlégōhīn-Telegraph Creek, and Łuwechōn-Iskut, and covers roughly one third of Tahltan Territory, including the sacred headwaters of the Stikine, Nass, and Skeena rivers. The Regional CE AOI represents an area that best captures the distribution, density, and abundance of Tahltan Values to be considered for this risk assessment for regional and cumulative effects impacts. This AOI also includes many other major mine proposals and existing hydroelectric, forestry, and infrastructure developments in Tahltan Territory that impact Tahltan community and individual wellbeing. The Regional Cumulative Effects AOI is shown in Figure 7.

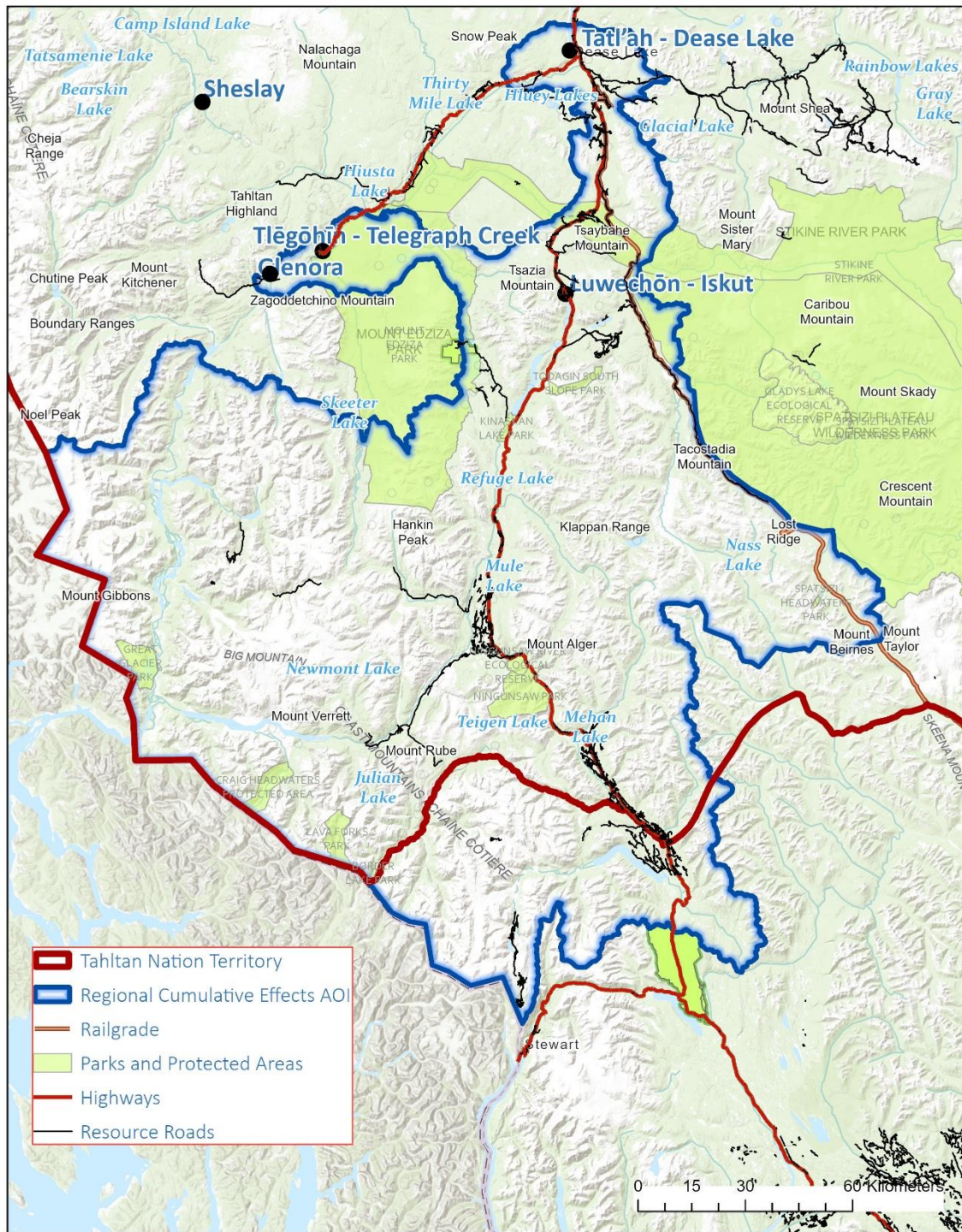


Figure 7: Map of the Regional Cumulative Effects AOI

The Regional CE AOI includes all Tahltan Values assessed to establish an understanding of the regional context and potential effects of the Block Cave Amendment broadly. The following Tahltan Values are included within the Regional CE AOI:

Groundwater;	Heritage Resources;
Surface Water;	Use of the Land and Resources for the exercise of Tahltan rights;
Terrain and Soils;	Social and Cultural Relationship to the Land and Each Other;
Fish, Fish Habitat, and Aquatic Resources;	Peaceful Enjoyment of Land;
Vegetation and Ecosystem Services;	Infrastructure and Services; and,
Wildlife and Wildlife Habitat;	Employment and Economy.
Human Health;	

The above values are considered in a holistic manner against the Tahltan Core Priorities and the TSP Management Directions to aid in the assessment of the current conditions in this section, and the severity of effects to the AOI in 9.3.

#### Ancient and Historic Conditions – Regional CE AOI

The Tahltan people have occupied and stewarded the lands and waters in Tahltan Territory since time immemorial. Tahltan continues to recognize that everything has a spirit, and there is no separation between Tahltan and the land. Tahltan ancestors have a continuous history over thousands of years of respecting the land to ensure, in turn, the land provides for Tahltan people.

Prior to European settlement in Tahltan Territory, the Tahltan managed a seasonal round that involved moves between fall, winter, and spring camps to best manage the required use of resources that sustained the Tahltan and maintained the landscape for continued use. The seasonal round had the Tahltan coming together at major fishing sites along the Stikine or major tributaries and lake outlets during the summer. Fall had extended family groups dispersing into the valleys between the alpine meadows and subalpine forest to hunt and gather. During the winter, the Tahltan would gather as family groups at larger winter hunting camps to hunt large ungulates and trap. In spring the Tahltan would disperse into smaller groups and gather at smaller lake sites and streams to fish, trap small game, and gather edible plants.

Specific systems for resource ownership controlled Tahltan access through clan and kinship protocols. In 1824, historic evidence from Hudson's Bay traders noted that the Tahltan were trading and thus stewarding and caring for the lands in the eastern portions of their territory, including the Todagin Plateau and the current Red Chris Mine area. The Todagin Upland Plateau, part of what is considered, "Groundhog Country" has traditionally been used for the hunting of Stone Sheep and mountain goat in the fall. Modern Tahltan also reported the Red Chris Mine area being excellent moose habitat and accessed this area for moose hunting. Major access, trade, and travel routes also traversed the Todagin Plateau—connecting key watersheds and supporting a connected Tahltan cultural ecosystem and trade economy across and beyond the Regional CE AOI.

The Tahltan people also sustainably mined the surrounding area adjacent to the Regional CE AOI for obsidian from Mount Edziza, laying the foundation of extensive trade relationships throughout the coast and across the Rocky Mountains. Mount Edziza obsidian is one of the most widely distributed obsidian in North America with traded obsidian from this area found in Alaska, the Yukon, Alberta, and south coastal BC. Trade routes criss-cross Tahltan Territory and the Regional CE AOI.

Since the 1830s, European colonization has brought in physical, administrative, and cultural barriers to Tahltan's occupation, use and stewardship of Tahltan Territory. Starting around the 1830s, the Tahltan people were devastated by diseases such as smallpox introduced by European fur traders. In combination with various additional epidemics, the Tahltan population was estimated to have been reduced by as much as two-thirds. Physical barriers were also erected, including the infrastructure of roads and railways which fragmented the landscape, changed the accessibility for both Tahltan and non-Tahltan, and changed the sensory experience of the landscape.

The Tahltan experience of colonization has been shaped by industrial-scale mining. In the 1860s, the Stikine gold rush brought colonial land tenure, colonial infrastructure development, and European diseases. As a result of Tahltan population decline and the mass arrival of settlers, Tahltan's way of life and exercise of rights and control over the large territory was greatly impacted. The Stikine gold rush was followed in 1874 with the Cassier

Gold Rush, and in 1898 the Klondike Gold Rush. These events all brought additional settlers, additional administration, and additional disturbance to the Tahltan way of life and Tahltan's Rights and Title.

Industrial scale logging has also had cumulative effects on the landscape and impacts to Tahltan's Rights and Title. Though the Tahltan had practiced hand logging for thousands of years, the industrialization and development of an export industry cleared large swaths of Tahltan Territory. Many sawmills were constructed between the late 1800s and early 1900s with most of them along the western border of the Regional CE AOI (NRCML 2025c). Though forestry was a major driver in industrial landscape development, both European mining and agricultural production required the clearing of the forested landscape, impacting the ability of the Tahltan to practice their traditional seasonal rounds and exercise their Rights and Title.

Mine exploration and general development in Tahltan Territory increased in the early-mid 1900s. In 1901, the telegraph line to Dawson City, crossing Tahltan Territory, was completed. The packtrail from Telegraph Creek to Dease Lake was upgraded to a road in 1928, and Highway 37 (the Stewart-Cassiar highway), which began in the late 1950s was completed in 1972. Access to remote areas greatly increased with the use of fixed-wing aircraft and helicopters in the 1950s. The Cassiar Asbestos Mine began production in 1952 and continued until 1992. Mining and road development came with powerline and rail corridors, increased forestry and hydroelectric developments. These developments also increased Tahltan involvement in the wage economy, diminishing traditional livelihoods and having cascading socio-economic, cultural, and community wellbeing effects. Cumulative impacts on the health of lands and waters and Tahltan way of life only continued to build throughout the 1900s. Despite Tahltan's 1910 Declaration, Tahltan had no authority nor decision making power as to how their lands and resources were developed, greatly diminishing Tahltan's exercise of their Rights and Title. A number of these historical developments, including the Cassiar Asbestos Mine, the rail grade, and countless mining exploration properties, were never properly reclaimed and continue to have effects on Tahltan Core Priorities to the present day.

#### Current and Future Conditions without the proposed Block Cave Amendment – Regional CE AOI

Historic resource extraction and associated roads, powerlines, rail lines, and associated disturbances and social impacts continue to be experienced by Tahltan through to the present day. In addition, a number of current anthropogenic influences and development are impacting the Regional CE AOI. Within the Regional CE AOI, key major project influences include<sup>5</sup>:

McLymont Creek Hydroelectric Project;	Various forestry tenures and cutting permits;
Forrest Kerr Hydroelectric Project;	Guide outfitting and licenced hunting opportunities;
Northwest Transmission Line (NTL);	Agricultural tenures;
Brucejack Mine;	Existing roadways and new road permits;
Eskay Creek Mine	5,857 mineral tenures that cover 1,403,810 ha or 46% of the Regional CE AOI; and
Several proposed mining projects, including Kerr-Sulphurets-Mitchell (KSM), Galore Creek, and Schaft Creek;	Hundreds of <i>Water Sustainability Act</i> authorizations.

Additional barriers to Tahltan way of life in recent times include:

#### Access

Highway 37 primarily and thousands of kilometers of other access roads have created significant effects in the Tahltan Nation and the region. Highway 37 initially began from the Alaska Highway where the road was constructed south (1959) to support the Cassiar Asbestos Mine. Over time the highway was constructed to Tat'ah - Dease Lake where it connected to the Telegraph Creek Road (Highway 51) by the early 1970's.

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<sup>5</sup> See Table 4-72: Regional Cumulative Effects Area of Interest Summary in Newmont's Chapter 4 of an Application for an Amendment to Environmental Assessment Certificate #M05-02 (May 2025) for a full list of current influences per AOI.

In total, there are 3,774 km of roads in the Regional CE AOI, with the following breakdown:

- 317 km Highway 37 or 51
- 87 km local or recreation
- 1,691 km resource related roads and trails (includes roads within cutblocks and right of ways)
- 803 km of unclassified or non-status roads (industrial)

### *NTL*

The Northwest Transmission Line is situated in the AOI and includes the transmission line extension to Luwechōn – Iskut and Red Chris Mine. The transmission line has a Right of Way (ROW; ranging from 25 m to 40 m wide) with associated access roads and clearings adjacent to the ROW that will remain in permanent early seral stage. The total disturbance is approximately 311 km and 388 ha.

### *Forestry*

At this time, there are 1,146 blocks, situated in Skeena Stikine Natural Resource District with the district operated from the Smithers office and the Coast Mountains Natural Resource District (office based in Terrace). Total forestry harvested areas have evolved as follows:

- 157 openings - 1980-1990, 9,673 ha
- 236 openings - 1991-2000, 6,310 ha
- 84 openings – 2001-2010, 1,44 ha
- 332 openings - 2011 – 2020, 4,996 ha
- 337 openings -2021-2024, 36 blocks, 2,365 ha

Given the duration of timber harvesting, the openings are early seral, but silviculture has been occurring on blocks to meet provincial standards and obligations.

Not only do the above projects impact the landscapes within which they operate, they have reverberating way of life, socio-cultural, economic, culture, and health effects (both positive and negative) on the surrounding communities that provide services, on the Tahltan employees, their families and communities, and on the social and cultural fabric of Tahltan.

The above listed projects and their associated effects must also be considered as cumulative to the current operations at the Red Chris Mine. As currently permitted, there are many effects felt by Tahltan members from the Red Chris Mine at the cumulative scale that will be experienced through to the future, including through closure and post-closure. For example, Tahltan community members have noted changes in their relationship with the land, including a lack of trust in the resources that come from the land, and have demonstrated a decreased ability to participate in cultural activities, leading to impacts on important aspects of Tahltan culture and community well-being. In addition, Tahltan communities have identified concerns on the cumulative effects related to mining revenues, benefits, services, infrastructure, housing, and employment have been leaving Tahltan Territory with communities shrinking over time. For a more detailed list of existing impacts being felt by Tahltan members due to the Red Chris Mine as permitted, see Section 9.2.1.4.

In addition, cumulative impacts in the area are expected to increase given the unique landscape and mining potential of the 'golden triangle' in Tahltan Territory, which includes most of the major gold, silver, and copper deposits in the west-central Stikine. With the current and future projects considered, stresses on all of the Tahltan Core Priorities are expected to persist or increase into the future, even without considering the proposed Block Cave Amendment.

### Alignment with Tahltan Stewardship Plan Management Directions

As identified in Table 9, there is a complex of management directions to be met under this Tahltan Risk Assessment to support of the assessment of Core Priorities against the current state of resource development, degraded landscapes, socio-cultural impacts, and effects to Tahltan way of life and quiet enjoyment of the land. In addition, the management directions and this risk assessment have to consider beings with no voices (e.g., trees, wildlife, salmon, fish).

Tahltan cumulative effects assessments are different than western science approaches where resource development (e.g., mining, commercial forestry, oil and gas), access, licenced hunting and other human consumptive and non-consumptive factors are creating cumulative adverse impacts on the land. This means that adverse impacts to the land change the relationships that Tahltan have with the land. Tahltan identity, cultural integrity, community cohesion and individual well-being are connected to the health of the land. Tahltan stewardship means maintaining good relationships to the land (and by “land” we always mean the entirety of land, including all living things, spirits, waters, and mountains, and the relationships between them), across space and through time. It means honouring our ancestors that came before us and caring for the generations still to come.

The scale, intensity, and duration of effects are occurring at finer levels or through non-spatial pathways to Tahltan and the land. This results in adverse impacts may not be evident under the western science approach but are having significant cumulative effects to Tahltan and the land.

The pace and scale of development under the current conditions has been identified by Tahltan as a driver in the Tahltan Stewardship Plan. There are current stressors which are affecting Tahltan Core Priorities in a number of the AOIs but appear to not be violating all of the management directions, only partially. Current impacts to Quiet Enjoyment of the Land, traditional land uses and practices, and effects from development occurring in community food security areas and culturally important areas are realities at this time. Food sovereignty, clean surface and groundwater sources, reducing development pressures in and around community areas, restoring the health of communities, reversing the out migration of benefits, services, and infrastructure are all current Tahltan concerns. This is at a time where Tahltan employment is high, economic benefits are high, and economic opportunities and benefits have been established through existing resource development agreements and arrangements with provincial and federal governments.

Overall, for the Regional CE AOI, there is alignment with the TSP with largely intact landscapes at a regional level, but there are areas in the Middle Iskut and Ningunsaw River, Gnat Pass Wildlife Recovery and Food Security Area, Tat’ah Management Area and all the large river corridors where restoration/reclamation requirements still need attention to align with these directions. In addition, Luwechōn Deferral Area is not well aligned with the current resource development tenures, interests, and development (including the Red Chris Mine) against the directions to protect community, sacred, food security, and quiet enjoyment of the land for several generations. It is not that the community may want increased resource development but not at this time, with the view to allow future generations to determine the outcomes. The lower river corridors areas are at this time meeting their respect management directions; however, if planned access were to occur to the Lower Iskut River, the management directions will be violated. A number of the management directions are violated or have a high probability of being violated against the Tahltan Core Priorities also then being violated when considering the current conditions for this AOI.

**Table 10. Regional CE AOI Condition Across the Tahltan Continuum (without Amendment)**

Summary of Regional CE AOI Condition Across the Tahltan Continuum (without Block Cave Amendment)				
Tahltan Core Priorities	ANCIENT	HISTORIC	CURRENT	FUTURE
Health of Lands and Waters	Healthy	Healthy	At Risk <i>(due to cumulative effects)</i>	Stressed <i>(due to cumulative effects of multiple major projects becoming developed with ongoing resource development)</i>
Tahltan Way of Life	Healthy	Degraded <i>(recognizing the major changes in Tahltan way of life from European contact onwards to shifting lifestyles to today)</i>	Impacted <i>(due to cumulative pressures on Tahltan use of lands and culture)</i>	Impacted <i>(due to increase cumulative pressures on Tahltan use of land and culture)</i>
Tahltan Rights and Title	Healthy	Stressed <i>(due to exertion of Crown authority)</i>	Degraded <i>(due to increasing exertion of Tahltan authority and slow recognition by the Province)</i>	Stressed <i>(due to increasing exertion of Tahltan authority)</i>

Ability to Reclaim and Restore	Healthy	Healthy	Stressed (due to existing impacts of un-reclaimed areas)	Degraded (due to potential cumulative impacts of un-reclaimable areas)
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### 9.1.5.2 Consent Area Cumulative Effects AOI

Atsentmā', meaning "meat mother" or "game mother" (Teit 1919<sup>6</sup>: 231–32).

*...Now the woman made a great blanket, like a huge moose-skin, and stretched it flat over the country. She tied one corner to Level Mountain,1 one corner to Dease Mountain, one corner to TsExtca'z Mountain, and one corner to Atixza' Mountain. She then called all her children, and told them to jump on the blanket one by one and run around. The blanket was springy, and moved up and down. Moose ran only a short distance when he was thrown off. Caribou ran much farther before bouncing off. Only Mountain-Sheep was able to run all round the blanket without being thrown off. Therefore the sheep is now the best runner of all the animals. He never tires and never falls down, and he can go in steep places anywhere. Having learned how each of her children could run, the woman now scattered her children over the country, assigning to each the locality best suited for him as habitat. The sheep and goat, being the surest-footed, were put in the most difficult country...*

The Consent AOI is dominated by the Todagin Mountain Plateau and neighbouring mountains in the AOI, an ancient and historic area for mountain ungulates and an area where Tahltan access the high country to be able to harvest debēhe (sheep), hodzih (caribou), kedā (moose), sas and khoh (bear), isbā (mountain goat), and ch'iyōne (wolf) primarily during the snow free periods. The Todagin Plateau is known as an area where animals go to get fat before the winter comes.

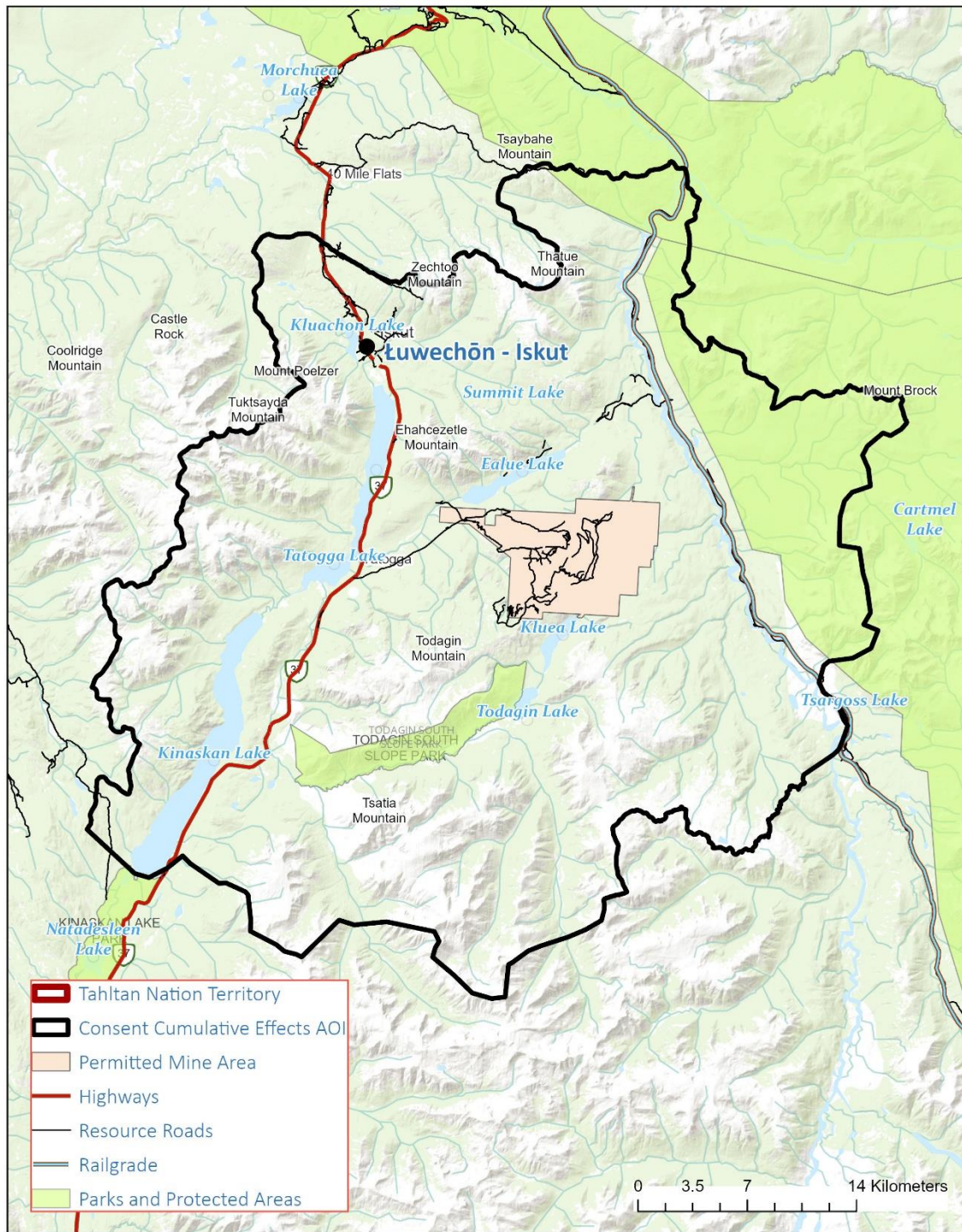
Since the 1900's, non-Tahltan have created barriers in this AOI through licenced hunting, increased access development, forestry, mineral exploration, and major projects. Through the policies, and practices of the federal and provincial government and their harsh treatment of Indigenous peoples, along with the prolonged effects on Tahltan from European settlers, more Tahltan people were forced to settle in communities like Iskut and to concentrate their food gathering needs within the Consent AOI.

The Consent Area Cumulative Effects AOI (Consent AOI) is the spatial area that has been defined in the Declaration Act Agreement. This area is 174,470 ha and covers approximately 6% of the Regional CE AOI. The Consent AOI contains the community of Iskut, important waterbodies – Eddontenajon, Tatogga, Kinaskan Lakes, the Klappan River, Ealue and Kluea-Todagin Lakes - and the watershed of the Stikine River. The Consent AOI also includes much of the high-altitude plateau ecosystem surrounding the Red Chris Mine.

The Consent Area AOI is an area of high density documented Tahltan cultural locations with 96 archaeological sites; 285 Tahltan Knowledge sites with numerous villages and other critical sites; numerous placenames in the area with sacred values such as Saddle Mountain; over 65 km of trails; all or portions of 377 Tahltan Knowledge areas with Łuwechōn – Iskut community in the centre of the AOI.

The Consent AOI also includes 287 mineral tenures primarily owned by Newmont and Skeena Gold and Silver.

The Consent AOI is shown below in Figure 8.



**Figure 8: Map of the Consent Area Cumulative Effects AOI**

Similar to the Regional CE AOI and due to the cumulative nature of the AOI, all Tahltan Values were assessed as part of the Consent AOI:

Groundwater;  
Surface Water;

Terrain and Soils;  
Fish, Fish Habitat, and Aquatic Resources;

Vegetation and Ecosystem Services;  
Wildlife and Wildlife Habitat;  
Human Health;  
Heritage Resources;  
Use of the Land and Resources for the  
exercise of Tahltan rights;

Social and Cultural Relationship to the Land  
and Each Other;  
Peaceful Enjoyment of Land;  
Infrastructure and Services; and  
Employment and Economy.

#### Ancient and Historic Conditions – Consent Area AOI

In ancient and historic times, Tahltan used the area for harvesting, gathering, medicinal and spiritual practices while also trapping with European trading posts and assembly areas, and trading with neighbouring Nations and settlers. Tahltan sites, land uses, and practices includes villages, obsidian mining, trapping, gathering, harvesting, fishing, travel, placenames, and trails throughout the region. Tahltan infrastructure includes bridges, stream and river trails, villages, cabins, campsites, and hunting/fishing/trapping/gathering camp sites.

Trails followed the Iskut upstream, leading to the numerous fish-bearing lakes of the Iskut headwaters, the obsidian quarries around Edizā'e (Mount Edziza), the high plateau hunting grounds across the Klastline, Klappan and Spatsizi. Southwest took one down the Iskut to the trapping grounds on the lower river flats and the summer dēk'āne (salmon) fishery, as well as the trade trails which turned south.

One of the creeks draining Klastline Plateau is named for the plentiful ram droppings to be found there in the winter. These names are generally an indication that the animal in question was hunted in that location. The Klastline Plateau, for instance, provided an excellent hunting range for sheep.

Tahltan continued trapping and harvesting in this area for much of the twentieth century, with hunting, fishing, trapping and berry picking and medicinal plant gathering sites abundant in the AOI. The mountains south of Todagin Creek remain important for Tahltan sheep hunters today, much as they were in the past, as witnessed by different place names. One of the mountains at the headwaters of Tsetia Creek, for instance, is called Chosyan mīkeh, meaning "ram's snare."

The Consent AOI also started to be developed by settlers for fur trading and local services. As noted above in for the Regional CE AOI, the gold rushes and subsequent development of the landscape have impacted Tahltan way of life and Tahltan Rights and Title. The area is also relatively accessible for tourism, licenced hunting, and recreation, with increasing competition between Tahltan, Indigenous hunters harvesting outside of their traditional territory, and from licenced hunters. The health of the lands and waters, way of life, and Tahltan Rights and Title are further impacted by the barriers created from more recent industrial developments in this AOI including, hydroelectric projects and logging.

#### Current and Future Conditions without the proposed Block Cave Amendment – Consent AOI

The AOI is one of the main breadbaskets for Łuwechōn - Iskut, used throughout the year. It is an integral part of the community well being, maintaining way of life and traditional practices of Tahltan community and families. It remains an area heavily accessed and used by Tahltan for cultural use, harvesting, and connecting to the land. Non--Tahltan continue to access the area, including the backcountry, for licenced hunting, fishing, recreation and tourism. Ongoing forestry and other surface land uses of the Consent AOI have impacts and will further create barriers on the health of the lands and waters, Tahltan way of life, and Tahltan Rights and Title into the future. The 287 mineral claims cover 50% of the Consent AOI, with the Red Chris Mine as the only operating mine.

The currently permitted Red Chris Mine will continue to bring benefits and impacts the Consent AOI whether it proceeds as an open pit (as permitted), closes before converting to Block Cave (last ore from open pit expected in 2028), or converts to Block Cave to operate for an additional 12 years. Associated increases in traffic and pressures on local infrastructure and services and the associated barriers, will remain until closure and post closure. Even post-closure and with reclamation, some aspects of the Red Chris Mine will be permanent (e.g. a flooded TIA, flooded pit lake and subsidence zone, and water management infrastructure). Given the size of the deposits in the area, the potential exists for the Red Chris Mine to continue development beyond the current Block Cave proposal, but in order to realize a future expansion, a number of design challenges will need to be addressed (e.g. alternative tailings management solution). With signing of the Declaration Act Agreement, TCG

is able to exercise their rights to consider consenting to future substantial changes proposed to the Red Chris Mine.

Alignment with Tahltan Stewardship Plan Management Directions

As listed in Table 9, the primary Management Units within the Consent AOI are the Łuwechōn Deferral Area, the Klappan Range and Burrage Management Area, and the Klappan Sacred Headwaters Protected and Conserved Area. It is evident the Łuwechōn Deferral Area management directions are being violated at this time with the number and spatial extent of mineral claims in the area, continued interests in projects such as Saddle, and GJ, and continued barriers to Tahltan in the use of the Consent AOI. The other two zones management directions are currently being stressed but current land uses still allow for management directions to be broadly met. If the long-term protection for the Klappan Sacred Headwaters is not achieved then the management directions will become impacted. The Klappan Range and Burrage Management Area could be violated if mineral exploration and resource development increase in the area, if licensed hunting or other non-Tahltan harvesting in the area increases, and if groundwater and surface water were to be further impacted across the Management units.

The community and the Nation have been clear in their concerns on the socio-cultural effects of resource development on shrinking communities and in their opposition to further mineral exploration or advancing mining projects such as the Saddle Project. The Iskut Deferral Area in the TSP is based on Łuwechōn- Iskut's direction, and is based an exclusion zone for the broader community area to support way of life, socio-cultural values, on the land access, and food security needs.

**Table 11. Consent Area CE AOI Condition Across the Tahltan Continuum (without Amendment)**

<b>Summary of Consent Area CE AOI Condition Across the Tahltan Continuum (without Block Cave Amendment)</b>				
<b>Tahltan Core Priorities</b>	<b>ANCIENT</b>	<b>HISTORIC</b>	<b>CURRENT</b>	<b>FUTURE</b>
<b>Health of Lands and Waters</b>	Healthy	Healthy	Degraded <i>(due to presence of mine and its landscape influence)</i>	Stressed <i>(due to presence of mine and its landscape influence)</i>
<b>Tahltan Way of Life</b>	Healthy	Degraded <i>(recognizing the major changes in Tahltan way of life from European contact onwards to shifting lifestyles to today)</i>	Impacted <i>(due to cumulative pressures on Tahltan use of lands and culture)</i>	Impacted <i>(due to increase cumulative pressures on Tahltan use of land and culture)</i>
<b>Tahltan Rights and Title</b>	Healthy	Degraded <i>(due to exertion of Crown authority)</i>	Degraded <i>(due to increasing exertion of Tahltan authority and slow recognition by the Province)</i>	Stressed <i>(due to increasing exertion of Tahltan authority)</i>
<b>Ability to Reclaim and Restore</b>	Healthy	Healthy	Degraded <i>(due to permanent impacts of Red Chris)</i>	Degraded <i>(due to permanent impacts of Red Chris)</i>

**9.1.5.3 Communities AOI**

Until the 1860's the community areas were part of the seasonal movements of Tahltan people, with movements within and across family areas, between villages and seasonal gatherings. Tahltan frequently travelled back and forth between villages and the tribal headquarters at the confluence of the Tūdeṣe chō (Stikine) and Tāltān (Tahltan) rivers, using ancient trails that followed the course of rivers, including Treaty Creek, Ningunsaw River, Unuk River, Stikine, Iskut and other major rivers in the Nation.

European contact began in the 1700's, by Russian explorers along coast of Alaska and trading with coastal nations and inland. By late 1700's European sourced goods were being traded with Tahltan. In the 1830's trading posts were established to varying degrees in the Tat'ah-Dease Lake and Tlĕgōhīn – Telegraph Creek areas with Tahltan applying pressures on explorers and fur traders to limit their presence until the Stikine and Cassiar Gold Rushes occurred in the 1860's and 70's. Then followed by the Klondike Stampede in the 1890's.

The gold rushes brought mass numbers of Europeans into the Nation to stay with fur trading, gold rushes, mining, and trade routes to the interior and further north being permanently established. The immigration of non-Tahltans commenced the colonial pressures on the Nation and further built out the use of the communities.

All of the communities are also under the outcomes of forced settlements, residential schools programs, assimilation policies and legislative effects of the *Indian Act*, federal and provincial policies, and effects of European settlers being on the land.

Łuwechōn-Iskut was formally established in 1962, as it was a gathering point for Tahltan families as they traveled from the interior, such as Metsantan or Caribou Hide to other villages or communities.

There are 9 Tahltan reserves located within the AOI.

The Communities AOI is 359,774.78ha and comprises 12% of the area in the Regional CE AOI. See Figure 8 for a map of the AOI.

Evidence of the importance of the area across the Tahltan Continuum is the density, distribution, and sensitivities of the following Tahltan sites, trails, and use areas:

- 288 archaeological sites;
- Over 780 Tahltan sites;
- High density of trails connecting communities and local uses; and
- Over a 600 Tahltan use areas, including 100's of village sites, cabins, camps, and burial places

There are grave sites, sacred areas, food security, and of course community infrastructure and transportation corridors in the AOI. There are also a number of important travel corridors through the area. Such as the "Old Tahltan" trail starting on the Stikine River at Tahltan Village, following the Klastline River to Kluachon Lake, then climbing to Summit Lake before descending to the Klappan River. These trails are where Tahltan walk today and where our ancestors walked.

All of these represent the linkages to ancient and historic times, and support the importance for today and future generations.

A map of the Communities AOI is Figure 9.



Figure 9: Map of the Communities AOI

The Communities AOI focuses on the wellbeing of Tahltan people and communities, as such, the Tahltan Values of focus in the Communities AOI are:

Human Health;	Peaceful Enjoyment of Land;
Use of the Land and Resources for the exercise of Tahltan rights;	Infrastructure and Services; and,
Social and Cultural Relationship to the Land and Each Other;	Employment and Economy.

#### Ancient and Historical Conditions—Communities AOI

Prior gold rushes and trade routes in the late 1800's, Tahltan maintained a seasonal round where they would move between summer assembly areas (such as Tūdeṣe chō (Stikine) and Tāftān (Tahltan) rivers), gathering, harvesting and family areas and winter gathering and village sites. Summer sites were generally located along the Stikine River or at major creek crossings and lake outlets to take advantage of favourable fishing conditions and gathering areas. In the late summer and fall, extended families would move to the high country to hunt and gather in the alpine and subalpine where gophers, moose, caribou, sheep, goats and bears are more easily found, generally in family groups. In winter, families would gather at large hunting camps in the valleys to hunt and trap. In the spring, families would disperse again in smaller groups to hunt and gather edible plants throughout Tahltan Territory. The assembly/gathering areas and villages were seasonally occupied and interconnected with an extensive trail network across the Tahltan Nation Territory.

The pattern of adapted seasonal round remained strong until the middle of the 20<sup>th</sup> century when a variety of factors, including pressure from the Department of Indian Affairs, forced many Tahltan people into a more permanent settlements in Iskut, Dease Lake, or Telegraph Creek, though some travel to winter camp sites and seasonal movements to key hunting, trapping, and communal gathering locations continued.

Historically, Tahltan communities, housing, and social and health services were organized by clans and families and centred around village life. Collectively, the emphasis of Tahltan life was on communal support and working together for the wellbeing of all members.

#### Current and Future Conditions without the proposed Block Cave Amendment – Communities AOI

Currently, urbanized areas comprise roughly 1,000 ha or 0.3% of the Communities AOI area, including Łuwechōn-Iskut, Tat'ah-Dease Lake, and Tlĕgōhīn – Telegraph Creek . Each community is built around federal reserves with residential areas and community and service infrastructure in each. Łuwechōn-Iskut and Tlĕgōhīn – Telegraph Creek are home to central Band offices, with Tat'ah-Dease Lake acting as the main service centre with a small airport (servicing Red Chris employee transport), health centre, gas station, and multiple lodging options. Tat'ah-Dease Lake and Łuwechōn-Iskut lie along Highway 37, with Tlĕgōhīn – Telegraph Creek only accessible by a gravel road (Highway 51). All three communities are geographically isolated from more major service centres, with a day's drive, often in winter conditions, necessary to reach Whitehorse, Terrace, or Smithers. Limited housing is available in each community, with multiple barriers preventing the erection of meaningful additional housing options.

Though each community has a primary school, Tat'ah-Dease Lake has the only option for secondary education, requiring students from the other communities to commute long distances and for upper-level courses to be accessed through correspondence. Though community-based health supports exist in each village, travel to a more major centre is often needed for specialized medical appointments and to access a pharmacy.

Within Tahltan Territory, members continue to have a deep and abiding connection to their territory. Key cultural gathering areas, including Tahltan and the Klappan, are seasonally visited and act as central locations for cultural gathering learning, exploring the territory, and harvesting. However, the contemporary economic conditions have put pressure on Tahltan members to transition from the traditional ways of being to wage labour within the capitalist system. Economic opportunities within Tahltan Territory exist within the service, guide-outfitter/tourism, and mining sectors. However, for many Tahltan members, transitioning to a more "western" economic model has led to departure from Tahltan Territory to access additional economic opportunities or to take advantage of provided transport to mines for shift work while residing in more major centres. Tahltan members can be found living globally, with many settled in communities of Whitehorse, Terrace, Smithers, Prince George, and Vancouver.

A key message heard through both Tahltan Risk Assessments (Eskay and Red Chris) is the concerns of shrinking Tahltan communities. Members expressed concerns about the socio-cultural effects on revenues,

benefits, services, housing, and infrastructure leaving Tahltan Territory with communities shrinking (out-migration) and negative social-cultural effects increasing (addictions, mental health, housing) in the territory over the past and current time periods. Finally, Tahltan have expressed wanting more ability to direct the pace and scale of resource development so positive legacies can be in place for current and future generations and the territory can move away from boom-and-bust cycles.

Alignment with Tahltan Stewardship Plan Management Objectives

The AOI is primarily situated in the Luwechōn Deferral Area, Lower Stikine and Iskut River Large River Corridor, Gnat Pass Wildlife Recovery and Food Security Area, and Tat’ah Management Area where all these TSP plan units have a focus on maintaining community uses, food security areas, community well-being and Tahltan way of life, maintaining intact landscapes and waterways, restoring and regeneration of habitats, Tahltan community use areas, and protection of both groundwater and surface water sources.

For Luwechōn-Iskut, being in the Luwechōn Deferral Area has management directions being violated at this time with the number and spatial extent of mineral claims in the area, continued interests in projects such as Saddle, and GJ, and continued barriers to Tahltan way of life.

Tlĕgōhĭn – Telegraph Creek is primarily situated in the Lower Stikine and Iskut River Large River Corridor where the focus is on maintaining healthy salmon ecosystems, and all ground and surface water sources that drain into the river systems. Ensuring Tahltan trails, camps, cabins and cultural values including Tahltan fish camps, quiet enjoyment of the land are protected and maintained. Currently for this community the management directions are largely being met with some portions of the AOI of violating management directions.

Tat’ah-Dease Lake is primarily situated in Gnat Pass Wildlife Recovery and Food Security Area and Tat’ah Management Area where large scale mining is not supported in the area, focus on maintaining community uses, food security areas, community well-being and Tahltan way of life, maintaining intact landscapes and waterways, restoring and regeneration of habitats, Tahltan community use areas, and protection of both groundwater and surface water sources. Similar to Tlĕgōhĭn – Telegraph Creek, the management directions are largely being met with some portions of the AOI at risk of violating management directions.

**Table 12. Communities AOI Condition Across the Tahltan Continuum (without Amendment)**

Summary of Communities AOI Condition Across the Tahltan Continuum (without Block Cave Amendment)				
Tahltan Core Priorities	ANCIENT	HISTORIC	CURRENT	FUTURE
Health of Lands and Waters	Healthy	At Risk <i>(due to impacts of colonization e.g. drinking water)</i>	Stressed	Stressed
Tahltan Way of Life	Healthy	Degraded <i>(recognizing the major changes in Tahltan way of life from European contact onwards to shifting lifestyles to today)</i>	Impacted <i>(due to cumulative pressures on Tahltan use of lands and culture)</i>	Impacted <i>(due to increase cumulative pressures on Tahltan use of land and culture)</i>
Tahltan Rights and Title	Healthy	Degraded <i>(due to exertion of Crown authority)</i>	Degraded <i>(due to increasing exertion of Tahltan authority and slow recognition by the Province)</i>	Stressed <i>(due to increasing exertion of Tahltan authority)</i>
Ability to Reclaim and Restore	Healthy	Stressed <i>(due to lasting impact of community settlements)</i>	Stressed <i>(due to lasting impact of community settlements)</i>	Stressed <i>(due to lasting impact of community settlements)</i>

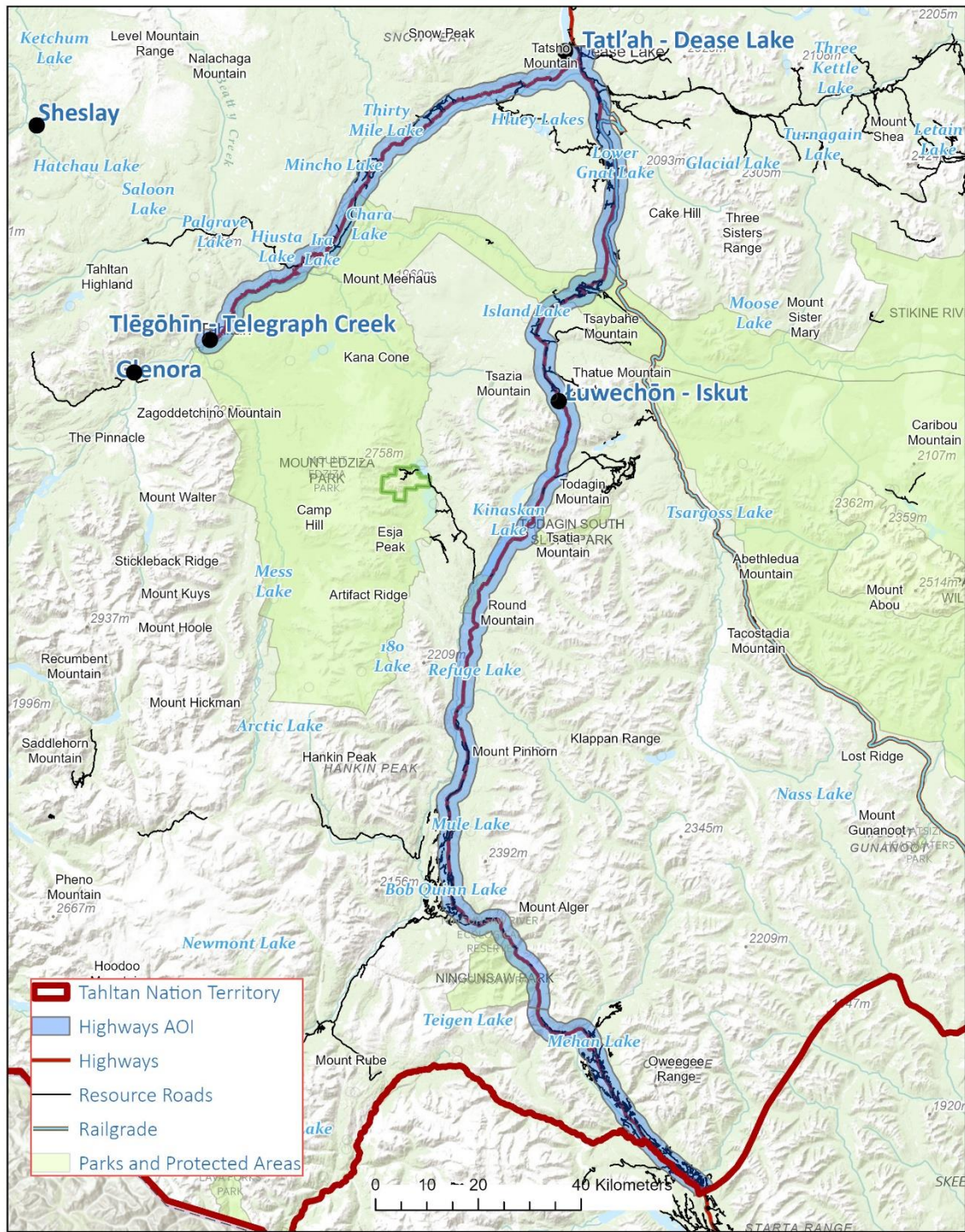
#### **9.1.5.4 Highways AOI**

Tahltan have maintained a dense and diverse interconnected trail and transportation system since time immemorial, and know the highways and roads that exist today in the territory are on Tahltan trails.

Transportation was identified related to the problems with increased road traffic creating higher potential accidents and declining road conditions/maintenance by Tahltan people. In addition, Tahltan have identified wildlife mortalities have been underreported for several decades under the provincial system (Wildlife Accident Reporting System-WARS) where wildlife mortalities tied to access from both licenced harvesting and with motor vehicle events and based on Tahltan monitoring is occurring at 2-4 times higher than what is being reported on provincial systems.

In addition, loss of culturally important gathering areas from infrastructure development such as pine mushroom and Burrage berries communities has been a barrier to Tahltan Core Priorities. The inconsistent and at times restricted access to Tahltan lands and water with resource roads has been a barrier since the 1990's and continues to date.

The Highways AOI encompasses an area of 156,342.40ha, which includes a 2.5 km buffer on either side of the paved sections of the highways. The Highways AOI resides within the Regional CE AOI and partially overlaps with the Consent and Communities AOIs. The purpose of the Highways AOI is to assess the changes in traffic and highway use on specified portions of Highway 37 and Highway 51 between Dease Lake and Telegraph Creek. See Figure 10 below for a map of the Highways AOI.



**Figure 10: Map of the Highways AOI**

To consider the potential effects of increased traffic from the proposed Block Cave Amendment, the following Tahltan Values are included within the Highways AOI:

Fish, Fish Habitat, and Aquatic Resources;  
Wildlife and Wildlife Habitat;

Human Health;  
Heritage Resources;

Use of the Land and Resources for the exercise of Tahltan rights;

Social and Cultural Relationship to the Land and Each Other;

Peaceful Enjoyment of Land; and

Infrastructure and Services.

#### Ancient and Historical Conditions—Highways AOI

As outlined above in the Regional CE AOI, Tahltan members have practiced a seasonal round that was facilitated by a system of trails that connected the Todagin area, where the Red Chris Mine site is located, to the rest of Tahltan Territory. Trails also connected to outside groups, facilitating trade and cultural exchange. The maintenance of these trails was managed by Tahltan members and “were part of an extensive trail system, both intra-territorial and extra-territorial, that connected the Todagin area with the adjacent regions” (Jones et al, 2021). Trails were significant in allowing for the continuation of Tahltan’s social and cultural connections of the land and the ongoing practices of all levels of Tahltan rights.

The trail system was first interrupted by the epidemics in the 1860s, though settlers likely used a number of Tahltan trails to access the territory. The gold rushes intensified use of several routes, in particular those connecting Glenora, Telegraph Creek, and Dease Lake.

Tahltan Territory was connected by road to Teslin, YK after 1950, with additional sections south of Dease Lake to service the Cassiar mining district completed in the 1960s and connecting to Highway 16 by 1975. Also known as the Stewart-Cassier Scenic Route, Highway 37 is the major BC highway that connects Dease Lake and Iskut to other communities to the south and north to the Yukon, with Highway 51 connecting Telegraph Creek to Dease Lake. With the expansion of mining exploration and forestry, Tahltan Territory has also been opened through the establishment (and subsequent insufficient remediation) of resource extraction roads.

Though essential to connection within Tahltan Territory and to outside communities, the highways also have created challenges in the territory: facilitating access of non-Tahltan to many important Tahltan cultural and harvesting sites; creating barriers and increasingly mortality and disturbance to wildlife; and, impacting the possibility of quiet enjoyment of the land for Tahltan.

#### Current and Future Conditions without the proposed Block Cave Amendment—Highways AOI

There are currently 1,305 km of roadways within the Highways AOI. Highway 37 is a two-lane highway with long, remote stretches without services or communications infrastructure. Winter driving conditions can be expected anytime between October and June. Traffic levels are highest in the summer with tourist traffic connecting BC to the Yukon, while industrial traffic is consistent throughout the year. Traffic volumes are generally on an increasing trend though volumes decreased during the COVID 19 pandemic. No public transportation options are available connecting Tahltan Territory to outside communities.

The currently permitted Red Chris Mine contributes to traffic predominantly on Highway 37, with concentrate trucks travelling an average of 276 return trips/month over the past five years to and from the Red Chris Mine, south to the Highways AOI border and beyond to the Port of Stewart. Tahltan members report safety concerns when interacting with large trucks on Highway 37, particularly when trucks travel closely together, leaving limited options for safe passing, or when trucks pass smaller vehicles, particularly in wet and winter conditions. The Red Chris Mine also busses employees from the Dease Lake airport, through Dease Lake, to the Red Chris Mine to connect with regularly scheduled flights. Further, Tahltan Territory-based employees drive personal vehicles, including along Highway 51, to the mine site gates to report for their shifts.

The Tahltan Industry Working Group, a group of Tahltan leadership and major project operators in Tahltan Territory, secured commitments in 2024 from the provincial and federal governments for investing \$195 million in Highway 37 and Highway 51 upgrades to increase accessibility and safety along these corridors. Work to initiate highway improvements has begun and is expected to continue over the next several years.

Looking forward, without the Block Cave Amendment, traffic volumes are expected to continue their generally increasing trend, depending somewhat on major project development. With mine closure, traffic volumes on Highway 37 south of the Red Chris Mine would see a significant drop, though volumes further south, with Eskay Creek and other potential mining developments such as Galore Creek, and existing Brucejack traffic, could continue to increase. Concerns related to safe travel conditions, highway maintenance, and interactions with wildlife will continue, potentially improving with investments in safety from the committed federal and provincial funding.

#### Alignment with Tahltan Stewardship Plan Management Objectives

The AOI traverses all of the TSP plan units in Table 9, except the Klappan Sacred Headwaters plan unit, and with all the negative effects of access to Tahltan Core Priorities and TSP management directions are a significant contributing factor in the violation of the directions.

**Table 13. Highways AOI Condition Across the Tahltan Continuum (without Amendment)**

Summary of Highways AOI Condition Across the Tahltan Continuum (without Block Cave Amendment)				
Tahltan Core Priorities	ANCIENT	HISTORIC	CURRENT	FUTURE
Health of Lands and Waters	Healthy	Stressed	Degraded	Degraded
Tahltan Way of Life	Healthy	Degraded <i>(due to presence of road)</i>	Impacted <i>(due to presence of road and increasing traffic)</i>	Impacted <i>(due to presence of road and increasing traffic)</i>
Tahltan Rights and Title	Healthy	Degraded <i>(due to exertion of Crown authority)</i>	Degraded <i>(due to increasing exertion of Tahltan authority and slow recognition by the Province)</i>	Stressed <i>(due to increasing exertion of Tahltan authority)</i>
Ability to Reclaim and Restore	Healthy	Stressed <i>(due to permanent presence of highways)</i>	Stressed <i>(due to permanent presence of highways and transmission line)</i>	Degraded <i>(due to permanent presence of highways and transmission line and future potential transmission line upgrades)</i>

#### 9.1.5.5 Klappan River AOI

The tall grasslands and sub-alpine meadows of the Klappan Sacred Headwaters are rich in game. For generations we have hunted and fished in this region. There is a good reason why it has been described by others as the “Serengeti of Canada’s north.” Caribou, mountain goats, Stone’s sheep, marmots and gophers can all be found in abundance. Three of the largest salmon-bearing rivers in northern British Columbia begin here—the Stikine, the Skeena and the Nass—their headwaters draining the narrow range of mountains that terminates at its northern end with Mount Klappan. In the past, we maintained a fall hunting headquarters between the headwaters of the Klappan and the Spatsizi which we called Tla’bane (Klappan), meaning “open, grassy land,” where we dried our meat for the winter months. In the southeastern portion of this region, we maintained two salmon fishing villages in the upper Skeena watershed, called Łuweyāze (which means “young fish”, spelled Kluayaz in maps today) and Łuwetandan (or Kluatantan, which means, “fish come up”). Today we have a number of hunting camps situated on the north flank of Mount Klappan and the headwaters of the Klappan River (Tahltan Central Government, 2025).

This has always been a region that we have had to defend from outsiders. Many of our stories speak of battles with neighbouring people and ambushes from raiding parties in this area. We have defended this country with our blood. As a Tahltan elder said of his great-great-grandfather “He take care of Klappan Mountain, ....”

The AOI is a sacred area to Tahltan and has been an area of wars, conflicts, and blockades in historic, and current times, where opposition to land use conflicts with Railgrade construction, licenced hunting, coalbed methane development, and coal mining interests have occurred since the 1970’s. The Railgrade is a legacy of unregulated and politically pressured development with historic environmental and socio-cultural impacts to Tahltan.

The Klappan River AOI encompasses the extent of the Klappan River Valley, flowing from the Sacred Headwaters area south of the Red Chris Mine and flowing south and east on its way to its confluence with the Stikine River. The Klappan River AOI is an area of 268,400.37 ha and overlaps with the eastern portion of the Regional CE AOI and portions of the Communities and Consent AOIs. The Klappan River Valley holds significant

cultural and spiritual importance to Tahltan and has been fiercely protected as an intact ecosystem and a culturally and ecologically sacred landscape. This includes a high density, distribution and sensitivity of Tahltan Knowledge sites including over:

- 75 archaeological sites with many being villages, burial sites, and sensitive features;
- 157 Tahltan sites with most being villages, burial sites, and way of life sites;
- 200 trails and 65 km of trail networks connecting towards Metsantan village, Upper Bell Irving River and Oweege area, Burrage Creek, and Stikine River as examples; and
- 300 village, placenames, important mountain passes, plateau harvesting areas, and fishing, trapping and gathering areas.

The AOI has been identified by Tahltan as a Tahltan Indigenous Protected and Conserved Area and Tahltan are pursuing protection under provincial government legislation, along with Tahltan laws.

The Klappan River AOI is shown in Figure 11.

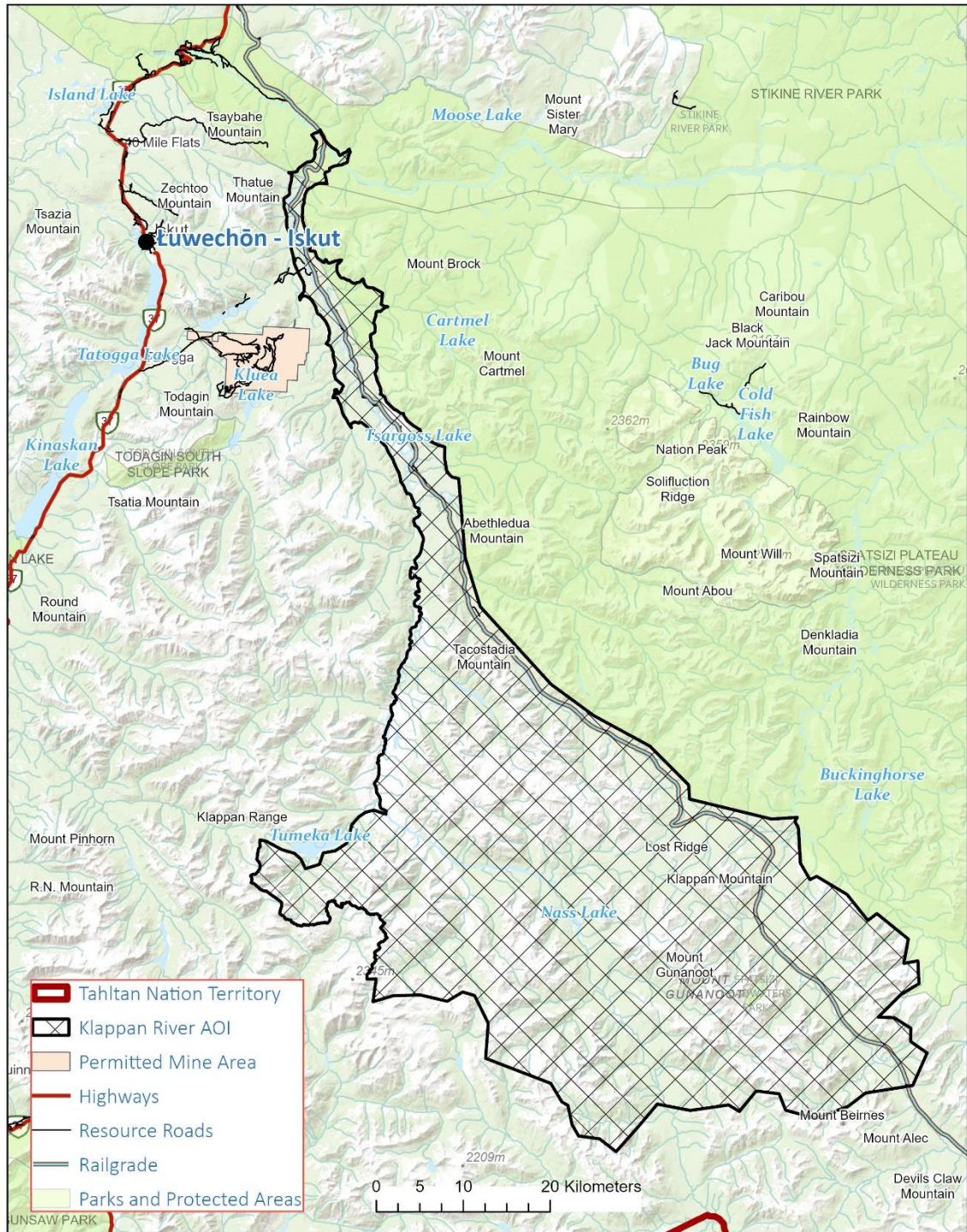


Figure 11: Map of the Klappan River AOI

Due to the significance of the Klappan River to Tahltan for its ecosystem values as well as cultural and spiritual value, the following Tahltan Values are included within the Klappan River AOI:

Groundwater;	Use of the Land and Resources for the exercise of Tahltan rights;
Surface Water;	Social and Cultural Relationship to the Land and Each Other; and
Fish, Fish Habitat, and Aquatic Resources;	Peaceful Enjoyment of Land.
Vegetation and Ecosystem Services;	
Wildlife and Wildlife Habitat;	
Heritage Resources;	

#### Ancient and Historic Conditions – Klappan AOI

The AOI has been home to Tahltan, located on a great flat called Klabba, beyond the Tahltan river (Emmons 1911: 18).

The name “Tlepanoten” means “people of the open, grassy country.” It is derived from “t’abane,” which means “open grass flats”—the Tahltan name for the Little Klappan River (McIlwraith 2012: 120), and the origin, obviously, of the “Klappan” found on today’s maps—and “tenne,” meaning “people.” According to a Tahltan elder (1983), the term specifically designates the country at the headwaters of the Little Klappan River, where the valley widens out before crossing the divide to Didene Creek and the headwaters of the Spatsizi River. As Dennis explains, looking west from the high ground of Tsegasetsedi or “Spruce Island,” located right at the divide, “there’s nothing but grass.” However, the term also designates more generally the grassy plateau region that encompasses the headwaters of the Klappan, Stikine, Skeena and Nass Rivers, often referred to as “Groundhog country” by neighbouring Indigenous groups (Jones et al. 2021).

Like the Todagin Mountain Plateau, the Klappan River and Klappan River valley were historically, and continue to be fundamentally important to Tahltan. The area within the Klappan River AOI has served as part of the Tahltan’s seasonal round, being used as a resource gathering area, which is connected to Tahltan’s Rights and Title and centers Tahltan cultural and spiritual beliefs and values. Archaeological and oral historical records show a number of village sites, trails, and campsites in the area and along the waterways from the Sacred Headwaters along the length of the rivers.

A village at Todagin Lake is described as both a summer and winter village, excellent for hunting sheep and fishing. Hunting and fishing camps are also identified at Kluea Lake and Black Lake. There was an important village site at Łuwechōn Menh (“big fish lake”) long before the establishment of the modern village of Iskut. Another important settlement area was at Klappan River Crossing on the main trail leading from Kluachon Lake to the Groundhog country of the upper Stikine. It would seem there were a number of village sites and campsites in this AOI though it is difficult to tell how many.

In addition, saltlicks have traditionally been used in association with hunting camps and are often situated in the vicinity of these areas of vital importance to game. Summer village sites were located at major river crossings and lake outlets with productive fishing conditions. In the fall, when households dispersed throughout the country, smaller timberline hunting camps provided access to gopher, sheep, goat, bear, caribou and ptarmigan. During the winter, families gathered at large camps in the forested valley bottoms to hunt ungulates. In the spring, households again dispersed to upland lakes and streams where fish and small game were available (Albright 1984).

The history of the Klappan River AOI follows a similar trajectory of the Regional CE AOI, with historic impacts beginning with the gold rushes in the 1860s, the subsequent loss of population, and the slow but steady development of settler and colonial infrastructure through the region impacting Tahltan’s way of life and their Rights and Title to the lands. Construction of the now-abandoned railgrade in the 1970s, which runs on the eastern portion of the boundary of the Klappan River AOI, greatly increased access, including motorized access to the area and was used by Tahltan and non-Tahltan alike.

#### Current and Future Conditions without the proposed Block Cave Amendment—Klappan River AOI

The Klappan River area has historically and continues to contribute to Tahltan culture and community cohesion, including nurturing knowledge transfer and social connection and being on the land. In particular, several families have culture camps established along the Klappan River, immediately downstream of the Red Chris Mine.

Increased population and potential development in the area have the potential to disrupt Tahltan culture with increased access, traffic, and disruptions to quiet enjoyment. Existence of the current mine upstream of important cultural locations along the Klappan River already limits Tahltan ability to access the area more broadly while harvesting from the camp and brings with it a chronic level of stress and concern for Tahltan members regarding the potential for serious accidents at the Red Chris Mine that could forever impact their sacred areas. Further, camp users report that under certain atmospheric conditions, dust, light, and blasting noise from the Red Chris Mine are all perceptible at the camps.

In the early 2000s, Tahltan strongly opposed Coal Bed Methane tenures near the headwaters of the Klappan, held at the time by Shell Canada. This opposition eventually led to the voluntary buy-back of the tenures by the province of BC in 2012, establishment of the Klappan Strategic Initiative, and development of the Klappan Plan. The Klappan Plan is a high-level collaborative land use plan between TCG and BC to guide protection, and limited future development, of the Klappan watershed and surrounding lands. During development of the Klappan Plan, the Red Chris Mine development proceeded. The Klappan Plan was signed in 2017.

With the Red Chris Mine upstream from the lower reaches of the Klappan River, and the North Valley of the TIA hydraulically connected to the Klappan through Quarry Creek and eventually the Northeast Arm, Tahltan is already concerned that seepage from the TIA has the potential to reach the Klappan River via shallow aquifer discharge to Quarry Creek or deep aquifer discharge to lower Quarry Creek. Though monitoring data has not yet been collected to determine if the TIA North plume has reached the Klappan River, and current modelling suggest it has not, it is confirmed that plumes in the shallow and deep alluvial aquifers are beyond existing monitoring wells, and the shallow and deep aquifer plumes continue to advance. New mitigations, such as the North Valley Shallow Aquifer Seepage Interception System, may reduce the rate of plume advancement; however, concern remains that with increasing TIA volumes, increasing TIA head pressure, seepage along the valley side-walls, high pumping rates from the deep aquifer, and the eventual requirement for continuous pumping for seepage interception in perpetuity, mitigation measures will not be sufficient in the long term to avoid TIA contamination in reaching the Klappan River. Though contamination impacts may be minimal due to the high volume of the Klappan River, the potential for mine contamination of the Klappan is entirely unacceptable to Tahltan.

Alignment with Tahltan Stewardship Plan Management Objectives

The Klappan Sacred Headwaters Protected and Conserved Area management directions are for protection and no industrial development. Direction includes focusing on creating opportunities for healing on the land for Tahltan members, restoring wildlife populations and enhancing opportunities for Tahltan harvesting. Tahltan want to see culture camps and cabin building to add to Tahltan occupancy of the area.

Currently, the AOI is At Risk or Stressed if a protection status is not achieved, and existing mineral, access, and resource development conditions stay in place.

**Table 14. Klappan River AOI Condition Across the Tahltan Continuum (without Amendment)**

Summary of Klappan River AOI Condition Across the Tahltan Continuum (without Block Cave Amendment)				
Tahltan Core Priorities	ANCIENT	HISTORIC	CURRENT	FUTURE
Health of Lands and Waters	Healthy	At Risk <i>(due to establishment of the Klappan railgrade)</i>	At Risk <i>(due to impacts of railgrade)</i>	Stressed <i>(due to potential for water impacts and Provincial Protection not confirmed)</i>
Tahltan Way of Life	Healthy	At Risk <i>(due to increased use by non-Tahltans)</i>	Stressed <i>(due to loss of easy access for Tahltan use of area)</i>	Degraded <i>(due to loss of easy access for Tahltan use of area, uncertainty and costs for remediation)</i>
Tahltan Rights and Title	Healthy	Degraded <i>(due to exertion of Crown authority)</i>	Degraded <i>(due to increasing exertion of Tahltan authority and slow recognition by the Province)</i>	Stressed <i>(due to increasing exertion of Tahltan authority)</i>

Ability to Reclaim and Restore	Healthy	Healthy	At Risk	Stressed <i>(due to potential long-term impact on water quality and rail grade)</i>
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#### 9.1.5.6 Saddle and Klappan Range AOI

The Saddle and Klappan Range AOI contain many important Tahltan travel corridors. This includes the “Old Tahltan” trail started on the Stikine River at Tahltan Village, followed the Klastline River to Kluachon Lake, then climbed to Summit Lake before descending to the Klappan River. From the Klappan River, it followed McEwan Creek eastwards to Cold Fish Lake, the Spatsizi Plateau and Metsantan Lake at the headwaters of the Stikine. Another important trail skirted the northeast flank of Mount Edziza and crossed the Klastline Plateau southwards until it descended to Kinaskan Lake. Tahltan using this trail had to cross the lake on a raft in the warm months (Kinaskan means “raft crossing”). On the east shore of Kinaskan Lake, the trail ascended Todagin Creek. At the outlet of Todagin Lake it forked. One branch continued along the valley and joined up with the Old Tahltan trail at Klappan River Crossing. Another branch climbed into the mountains south of Todagin valley, and eventually crossed the Klappan River much further upstream. This trail followed the Little Klappan River (in Tahltan called the Tl'abane) to its headwaters, where an important village was located on the divide between the Klappan and Spatsizi Rivers, at an area called Tsegasetsedi (“spruce island”) by the Tahltan (Dennis 1983).

The area contains many sacred and important sites related to Tahltan histories, placenames, village and burial sites, and important harvesting, gathering, and medicinal areas used since ancient times but still important to Luwechōn-Iskut people today for way of life, food security, and community well being.

The Saddle and Klappan Range AOI has over:

- 280 Tahltan sites of saltlicks, camps, villages, sacred areas, placenames, burial sites, and others;
- 140 km of trail networks;
- 274 village, placenames, important mountain passes, plateau harvesting areas, and fishing, trapping and gathering areas; and
- 46 archaeological sites with many being villages, burial sites, and sensitive features.

The Saddle and Klappan Range AOI encompasses 238,575.41 ha in a crescent shape that starts north of Iskut and loops west to the Kinaskan Lake towards the mountainous region south of the Red Chris Mine and makes up ~8% of the Regional CE AOI. Although the current Red Chris Mine and proposed Block Cave Amendment are not within this AOI, this area was selected due to the high use and cultural importance of this area to Tahltan, including density of archaeological sites, and the potential indirect effects of the proposed Block Cave Amendment on this area. The area is also a continuation of the high-alpine plateau ecosystem, extending from the Todagin Plateau, that supports critical populations of Stone Sheep and Mountain goat.

The AOI is identified in Figure 12.

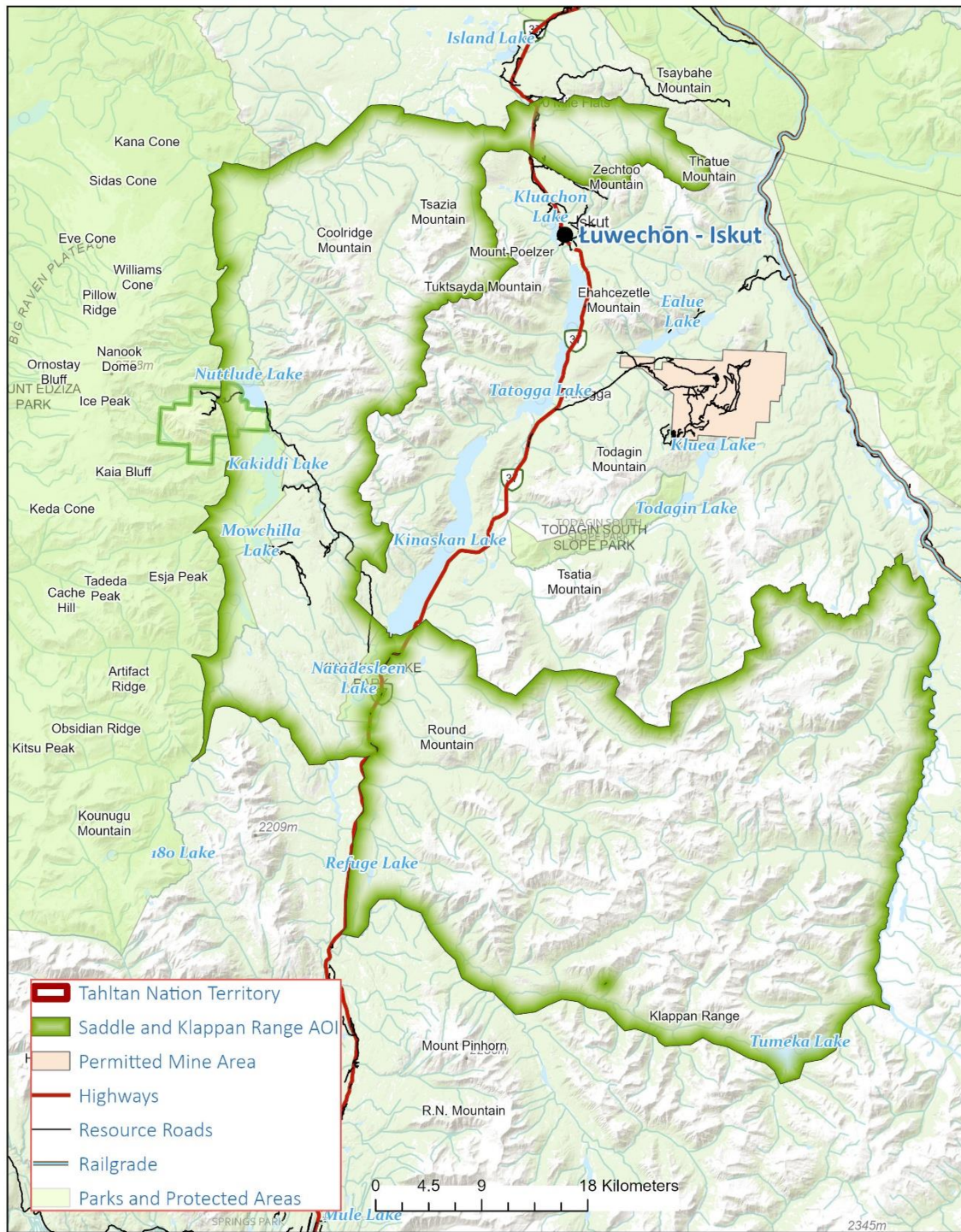


Figure 12: Map of Saddle and Klappan Range AOI

The following Tahltan Values are included within the Saddle and Klappan Range AOI:

Groundwater;	Heritage Resources;
Surface Water;	Use of the Land and Resources for the exercise of Tahltan rights;
Fish, Fish Habitat, and Aquatic Resources;	Social and Cultural Relationship to the Land and Each Other; and
Vegetation and Ecosystem Services;	Peaceful Enjoyment of Land.
Wildlife and Wildlife Habitat;	
Human Health;	

#### Ancient and Historical Conditions—Saddle and Klappan Range AOI

The Saddle and Klappan Range AOI is plateau country important to Tahltan as evidenced by the trail corridors connecting to the tribal headquarters at the confluence of the Tūdeḡe chō (Stikine) and Tāltān (Tahltan) rivers, to the eastern and southern interior family areas, and to the western travel, fishing, and trading areas. It is an ancient and historic area for mountain ungulates and an area where Tahltan access the high country to be able to harvest debēhe (sheep), hodzih (caribou), kedā (moose), sas and khoh (bear), iṣbā (mountain goat), and ch'iyōne (wolf) primarily during the snow free periods.

The seasonal patterns of the importance of lowland in the winter and spring, summer fishing, followed by harvesting and gathering in the plateaus are identified in other sections in this report.

One of the creeks draining Klastline Plateau is named for the plentiful ram droppings to be found there in the winter. These names are generally an indication that the animal in question was hunted in that location. The Klastline Plateau, for instance, provided an excellent hunting range for sheep.

Tahltan continued trapping and harvesting in this area for much of the twentieth century, with hunting, fishing, trapping and berry picking and medicinal plant gathering sites abundant in the AOI. The mountains south of Todagin Creek remain important for Tahltan sheep hunters today, much as they were in the past, as witnessed by different place names. One of the mountains at the headwaters of Tsetia Creek, for instance, is called Chosyan mīkeh, meaning “ram’s snare.”

#### Current and Future Conditions without the proposed Block Cave Amendment—Saddle and Klappan Range AOI

The AOI is an area of community use, a component of the community food security areas, critical mountain ungulates ranges, part of the high country interconnected to Tahltan land uses and harvesting practices, and an area of important placenames and sacred areas. Currently there are over 214 mineral tenures, and existing forestry access and openings in the AOI. While forestry is not actively harvesting in the AOI, it has a history and is within existing forestry tenures and at some risk of being harvested in the future. This is an incremental impact on Tahltan way of life and the exercise of Tahltan Rights and Title.

There is high industrial interest in the Saddle and Klappan Range AOI, evidenced by a high density of exploration and forestry permits, including the Saddle North tenures, held by Newmont Corporation. The area is used by Tahltan peoples for sustenance and spiritual purposes, it contains Tahltan guide outfitters concessions, and is accessed for recreation purposes by non-Tahltan users.

The Red Chris Mine is not within the Saddle and Klappan Range AOI and is minimally influenced by the mine as currently permitted. However, as a notable future influence, there is a cumulative pressure of increased mining exploration and potential for built mines in this AOI in the future as 30% of the AOI is covered with mineral tenures. Such expansion and even perceived risk of expansion will have impacts on Tahltan way of life into the future, including sensory and spiritual impacts leading to a reduction in knowledge transmission, a disruption to Tahltan way of life and exercise of Tahltan Rights and Title, and the ability to reclaim and restore the lands.

#### Alignment with Tahltan Stewardship Plan Management Objectives

The AOI is primarily situated in the Łuwechōn Deferral Area, Klappan Range and Burrage Management Area, and Klappan Sacred Headwaters Protected and Conserved Area. The management directions for the Łuwechōn Deferral Area are being violated at this time with the number and spatial extent of mineral claims in the area, continued interests in projects such as Saddle, and GJ, and continued barriers to Tahltan.

The other two zones management directions are currently being stressed but current land uses still allow for management directions to be broadly met. If the long term protection for the Klappan Sacred Headwaters is not

achieved then the management directions will become impacted. The Klappan Range and Burrage Management Area could be violated if mineral exploration and resource development increase in the area, if licensed hunting or other non-Tahltan harvesting in the area increases, and if groundwater and surface water were to be further impacted across the Management units. Currently both are At Risk to Stressed under the current conditions.

The Łuwechōn community and the Nation have been clear in their concerns on the socio-cultural effects of resource development on shrinking communities and in their opposition to further mineral exploration or advancing mining projects such as the Saddle Project.

**Table 15. Saddle and Klappan Range AOI Condition Across the Tahltan Continuum (without Amendment)**

Summary of Saddle and Klappan Range AOI Condition Across the Tahltan Continuum (without Block Cave Amendment)				
Tahltan Core Priorities	ANCIENT	HISTORIC	CURRENT	FUTURE
Health of Lands and Waters	Healthy	Healthy	At Risk	Stressed <i>(due to future natural resource development projects)</i>
Tahltan Way of Life	Healthy	At Risk <i>(due to increased use by non-Tahltans)</i>	Stressed <i>(reduction in Tahltan use of area due to cumulative factors)</i>	Stressed <i>(reduction in Tahltan use of area due to cumulative factors and future potential projects)</i>
Tahltan Rights and Title	Healthy	Stressed <i>(due to exertion of Crown authority)</i>	Stressed <i>(due to increasing exertion of Tahltan authority and slow recognition by the Province)</i>	Stressed <i>(due to increasing exertion of Tahltan authority)</i>
Ability to Reclaim and Restore	Healthy	Healthy	At Risk	Stressed

**9.1.5.7 Red Chris Mine AOI**

Tahltan use and occupancy of the Todagin Plateau and surrounding area, going back thousands of years, is well-documented, and there is no room to doubt our title to this land. Tahltan continued traditional practices of hunting, gathering and fishing in the area until the Red Chris mine began operations in 2015.

Year-round village sites that continued to be occupied in the early twentieth century are recorded within and immediately adjacent to the Red Chris leases and tenures. There are dozens of traditional campsites in the valleys and alongside creeks, and Tahltan trails crisscross the entire region. Most of the rivers, creeks, lakes and mountains in the area have Tahltan names. Archaeological sites (some of them now inundated by the tailings impoundment area), recorded in the course of investigations carried out during and after the initial assessment process for the mine, confirm the centuries-long use and occupancy of this area by Tahltan people.

The Todagin Plateau, is part of the food security area or one of the “breadbaskets” for Łuwechōn- Iskut. Of the three Tahltan communities, Łuwechōn is the most effected by the Red Chris mine.

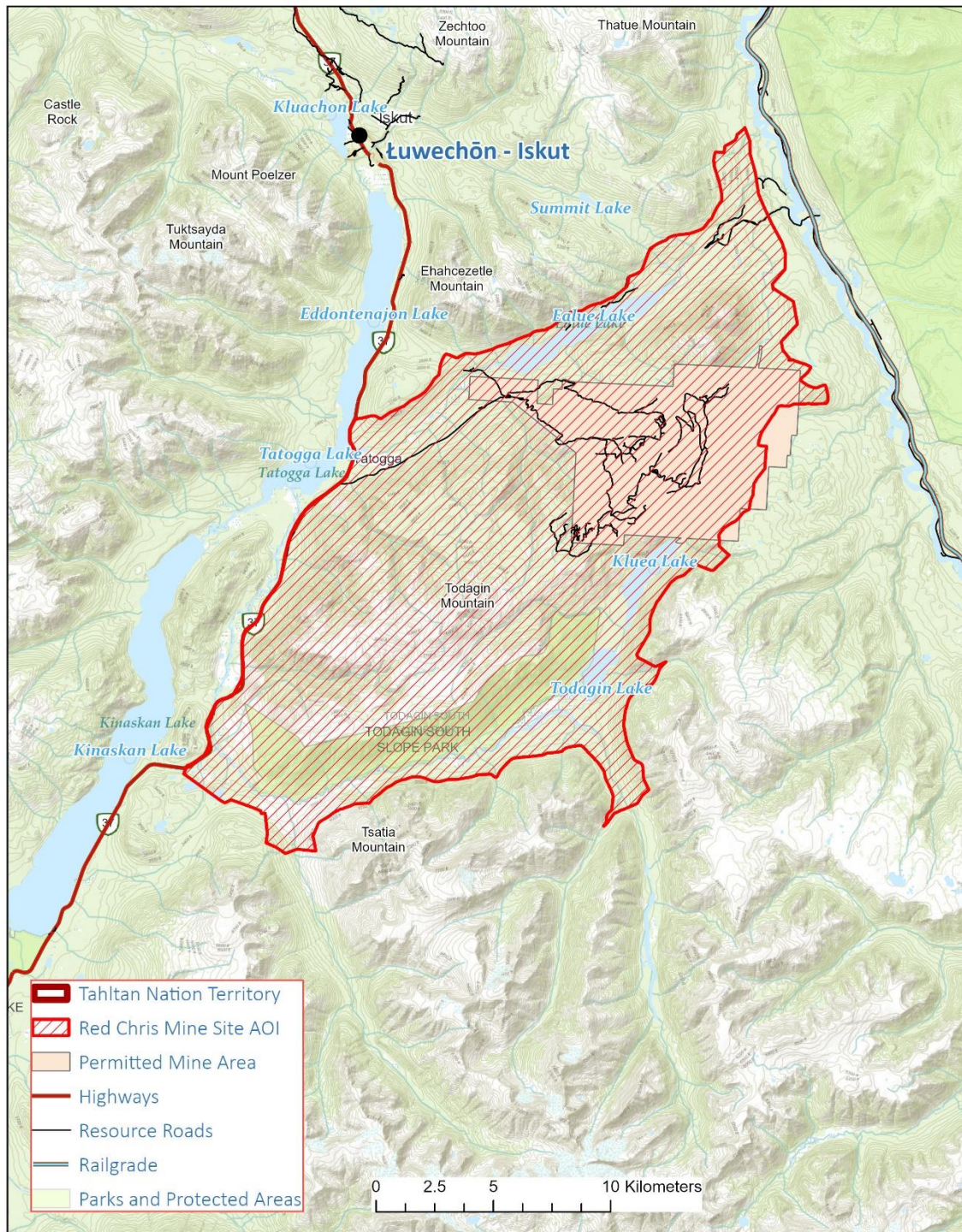
The plateau has a history (both Tahltan and western science) of supporting a high density population of Stone’s Sheep. The last 40 years of scientific monitoring has recorded at least 200 sheep in the area, with some exceptions due to extreme freeze thaw events on lamb survival. This is again showing how western science is showing some consistency with Tahltan Knowledge for the lands and waters in the territory.

The AOI is situated within the Consent AOI and the Łuwechōn Deferral Area, areas covered by mineral tenures, a permitted mine area, and of course the mine site. This relationship of high mountain ungulates values, Tahltan interconnection to the plateau, community values, and mineral interests is why the Todagin Wildlife Management Area was designated out of the Cassiar Iskut Stikine Land and Resource Management Plan. This includes the western area of the plateau, and is a designation where outside of the permitted mine area, requires decisions to be made by the Minister of WLRS or a designate as the shared - decision maker with Tahltan.

The Red Chris Mine AOI has over:

- 70 Tahltan sites of saltlicks, camps, villages, sacred areas, placenames, burial sites, and others;
- 35 km of trail networks;
- 115 village, placenames, important mountain passes, plateau harvesting areas, and fishing, trapping and gathering areas; and
- 54 archaeological sites with many being villages, burial sites, and sensitive features.

The Red Chris Mine AOI is an area of 37,525ha centered around the Red Chris Mine site. This AOI accounts for 1.2% of the Regional CE AOI. The assessment area is the Red Chris Mine itself and the nearby waterbodies that it has the potential to affect, including Ealue and Kluea Lakes. The existing disturbances of the Red Chris Mine are 1,453 ha within this AOI. The AOI is shown in Figure 13.



**Figure 13: Map of the Red Chris Mine AOI**

Given the acute impacts of the Red Chris Mine, all Tahltan Values are assessed for the Red Chris Mine AOI, including:

Groundwater;	Human Health;
Surface Water;	Heritage Resources;
Terrain and Soils;	Use of the Land and Resources for the exercise of Tahltan rights;
Fish, Fish Habitat, and Aquatic Resources;	Social and Cultural Relationship to the Land and Each Other; and
Vegetation and Ecosystem Services;	Peaceful Enjoyment of Land.
Wildlife and Wildlife Habitat;	

#### Ancient and Historical Conditions—Red Chris Mine AOI

Netce'nsta or Earth-Mother

*The Earth-Mother lives under the earth, and holds it up. The earth is like a crust or blanket spread out flat, and she is like a post that holds it up. Sometimes she gets tired and shifts her position; or sometimes the earth sags in some place where the weight is on it, and then she moves her arm to put it up. Then we have an earthquake. Earth-Mother is becoming older and weaker all the time, and by and by she will not be able to hold up the earth any longer.*

*Then it will fall into the water which is below the earth, and disappear. Once Earth-Mother told the people, "When you feel an earthquake, you must not be alarmed. It is only because I am a little tired, and am shifting my position. It is no sign that I am going to fall down, and that the earth will come to an end." Therefore people are not afraid of earthquakes.*

Our ancestors respected the land and passed it down to their children in much the same condition as they had found it. We must continue to protect and conserve the interconnected whole that is Keyeh. This means caring for the land as a whole and all of its interdependent parts, respecting the relationships that exist between different features of the land and the animals, plants, and spirits that inhabit it (ecosystems), including ourselves. It is thinking of the land in terms of cycles, shorter seasonal cycles and longer ecological cycles, and Tahltan have always understood that we need to live within those cycles by making our activities align with them as much as possible. On the other hand, we accept that we will never fully understand the land—the larger community of which Tahltan are only a small part. This means that we need to be humble and careful and never forget that there is always more to learn. This can happen, for instance, by focusing too much on one part of the land, forgetting that we need to view the land as a whole of interdependent parts that are in dynamic and constantly shifting relationships with one another. By disrupting the relationships between parts, in ways that we do not understand, we can upset the land's balance and bring about unanticipated consequences.

The Todagin Mountain Plateau and neighbouring mountains in the AOI, an ancient and historic area for mountain ungulates and an area where Tahltan access the high country to be able to harvest debēhe (sheep), hodzih (caribou), kedā (moose), sas and khoh (bear), isbā (mountain goat), and ch'iyōne (wolf) primarily during the snow free periods. The Todagin Plateau is known as an area where animals go to get fat before the winter comes.

The ancient and historic conditions of the Regional CE and Consent AOIs identified above are also applicable to the Red Chris Mine AOI, particularly the importance of the Todagin Plateau. It is repeated here to reinforce the importance of the plateau across the Tahltan Continuum. The area is particularly notable given the high density of historic trails, camps, and archaeological sites in the AOI. The Red Chris Mine AOI is considered part of the food security areas for the community of Łuwechōn- Iskut.

#### Current and Future Conditions without the proposed Block Cave Amendment

The Red Chris Mine is the primary driver of impacts in this AOI. Tahltan Rights and Title were generally discounted and disregarded during the approval of the Red Chris Mine as permitted by the EAO in 2005 and Canada in 2006 (upheld by the Supreme Court in 2010) and permitted by BC in 2012. Since construction and operations in 2015, the mine has irrevocably impacted current and future generations of Tahltan's relationship to the area while also providing local, economic development to Tahltan members, families, and communities.

In 2017, the community of Iskut, frustrated from the development of the Red Chris Mine and associated impacts, issued a declaration which stated that no further industrial development should occur within 20km of the community. Along with community impacts, the community expressed concerns about impacts on Stone Sheep herds, including their lambing habitat, along with caribou, moose, mountain goats and marmots. The area is

used by Iskut community members for subsistence hunting, fishing, gathering including medicinal plants, culture camps, and for recreation, along with commercial guide outfitting. Tahltan recognize this area also overlaps with very rich mineral deposits and potential.

The existing Red Chris Mine has impacted Tahltan way of life, including cultural continuity, socio-economic context, and place-based practices. Tahltan exercise of rights has been greatly reduced in the area, including the ability of hunters and guide outfitters to carry out activities due to both restriction in access to the area as well as avoidance of the area by game since the mine was constructed. Tahltan members have generally avoided the area surrounding the Todagin Upland Plateau for fishing, hunting, and other resource harvesting since the Red Chris Mine was established due to access restrictions, desire for quiet enjoyment, or real and perceived impacts to resources and personal safety (see Section 9.2.1.4 for a more in-depth discussion of current mine impacts).

Looking forward, the Red Chris Mine will have a permanent impact through closure and post closure. Though aspects of the mine can be reclaimed at closure, other features will be permanent, including the dams, TIA, flooded open pit, and water management infrastructure. As per the current closure plan, the RSA will remain a permanent, though reclaimed landform, and perpetual water pumping and treatment will be required to maintain water quality downstream of the mine. Water treatment and pumping may not achieve the long term goals of maintaining all downstream water quality below BC Water Quality Objectives. See further discussion on closure and associated effects in Section 9.4.1.1.5.

#### Alignment with Tahltan Stewardship Plan Management Objectives

The Red Chris Mine AOI falls within the Łuwechōn Deferral Area in the TSP. The Łuwechōn Deferral area was established in the TSP to acknowledge that future generations may wish to develop the mineral potential in the area, but the current generation is deferring this decision to future generations.

Management direction in the TSP prohibits mineral exploration and mining, but recognizes the continuation of the current operations at the Red Chris Mine. Additional commercial industry is not supported in the TSP, though potential development of low-impact industry such as electrical infrastructure, guide outfitting, Tahltan-led tourism, fishing, carbon storage, range and grazing, and recreational vehicle use can be permitted under specific circumstances.

The management directions for the Łuwechōn Deferral Area are being violated at this time with the number and spatial extent of mineral claims in the area, and continued barriers to Tahltan. The AOI under current conditions is designated as Impacted.

**Table 16: Red Chris Mine AOI Condition Across the Tahltan Continuum (without Amendment)**

Summary of Red Chris Mine AOI Condition Across the Tahltan Continuum (without Block Cave Amendment)				
Tahltan Core Priorities	ANCIENT	HISTORIC	CURRENT	FUTURE
Health of Lands and Waters	Healthy	Healthy	Impacted (due to acute disturbance of mine)	Impacted (due to continued disturbance of mine)
Tahltan Way of Life	Healthy	At Risk (due to increased use by non-Tahltans)	Impacted (due to removal of access and low Tahltan use of area with presence of the mine)	Impacted (due to removal of access and low Tahltan use of area with presence of the mine)
Tahltan Rights and Title	Healthy	Degraded (due to exertion of Crown authority and exploration activities at Red Chris impact lands)	Impacted (due to increasing exertion of Tahltan authority and slow recognition by the Province)	Impacted (due to increasing exertion of Tahltan authority and slow recognition by the Province)
Ability to Reclaim and Restore	Healthy	Healthy	Impacted (due to permanent impacts of Red Chris)	Impacted (due to permanent impacted of Red Chris)

**9.1.6 Summary of Conditions of Tahltan Lands, Culture, and Communities Across AOIs**

**9.1.6.1 Summary of Tahltan Core Priorities**

Table 17 summarizes the condition of AOIs across the Tahltan Continuum holistically and as described in preceding narratives. The evaluation of AOI conditions (e.g. Healthy, Stressed, Impacted, etc.) across the Tahltan Continuum was completed as a subjective exercise, using inputs from historical documents, Tahltan member accounts, the TAS, TLUOS, Tahltan Knowledge, and engagement and in consideration of the Amendment Application. The summary of AOI conditions across the Tahltan Continuum is an attempt to examine conditions holistically, including across time and space, using the Tahltan perspective as the main contributor to the ratings. Given that impacts across Core Priorities interact, definitions for each Core Priority were referenced to ensure a consistent approach to rating. The definitions of each Core Priority are provided in 3.9.2.4. Table 17 illustrates the condition of the AOIs, projected into the future, *without the Block Cave Amendment*, setting the baseline by which the effect of the Block Cave Amendment, per AOI, can be characterized holistically in Section 9.3.2. Where an AOI is not “healthy”, the key, but not the *only* driver for the impact is noted along with the rating.

**Table 17: Summary of AOI Condition Considering Tahltan Core Priorities and Tahltan Stewardship Plan Management Directions (without the Amendment)**

<b>Summary of AOI Condition Considering Tahltan Core Priorities and Tahltan Stewardship Plan (TSP) Management Directions (without the Amendment)</b>				
<b>Healthy</b> Tahltan Core Priorities and TSP Management Directions are being met.				
<b>At Risk</b> Tahltan Core Priorities and TSP Management Directions are being met but can be violated with additional resource development or direct effects are greater than estimated.				
<b>Stressed</b> Tahltan Core Priorities and TSP Management Directions are being stressed but can be restored/maintained through mitigations, conditions, and increased application of TSP management directions for restoring/reclaiming the land.				
<b>Degraded</b> Tahltan Core Priorities and TSP Management Directions are being degraded for one or more Tahltan Value but may be restored/maintained through mitigations, conditions, and increased application of TSP management directions for restoring/reclaiming the land				
<b>Impacted</b> Tahltan Core Priorities and TSP Management Directions for one or more Tahltan Value are violated and the ability to restore the AOI is either 3 or more generations or irreversible.				
<b>AREA OF INTEREST</b>	<b>ANCIENT</b>	<b>HISTORIC</b>	<b>CURRENT</b>	<b>FUTURE</b>
Regional CE AOI	Healthy	At Risk	Stressed (due to cumulative effects)	Stressed (due to cumulative effects)
Consent AOI	Healthy	Healthy	Degraded (due to cumulative effects, effects on rights and title, impacts of Red Chris)	Degraded (due to cumulative effects, effects on rights and title, impacts of Red Chris)

Summary of AOI Condition Considering Tahltan Core Priorities and Tahltan Stewardship Plan (TSP) Management Directions (without the Amendment)				
Communities AOI	Healthy	At Risk (Recognizing major changes in Tahltan way of life post contact)	Stressed (due to cumulative stressors on communities, including both positive and negative community impacts of Red Chris Mine development)	Degraded (due to cumulative stressors on communities, including both positive and negative community impacts of Red Chris Mine development)
Highways AOI	Healthy	At Risk (due to development of highways)	Stressed (due to traffic and safety issues on highways)	Stressed (due to cumulative effects of multiple major projects using highway 37)
Klappan River AOI	Healthy	At Risk	Stressed (due to the cumulative development interests, development of Red Chris, and importance of area to Tahltan)	Stressed (due to the cumulative development interests, development of Red Chris, and importance of area to Tahltan)
Saddle and Klappan Range AOI	Healthy	At Risk	Stressed (due to resource development interest and importance of area to Tahltan)	Stressed (due to resource development interest and importance of area to Tahltan)
Red Chris Mine AOI	Healthy	At Risk	Impacted (Due to presence of Red Chris Mine)	Impacted (Due to presence of Red Chris Mine)

## 9.2 STEP 2: WHAT ARE THE EXPECTED EFFECTS ON TAHLTAN LANDS, CULTURE, AND COMMUNITIES?

Step 2 identifies and summarizes the expected specific and singular effects from the Block Cave Amendment to Tahltan lands, culture, and communities as identified by NRCML and Tahltan. Inputs informing this step include but are not limited to inputs from Tahltan community engagement, Tahltan Knowledge, and input from the THREAT's technical review of NRCML's proposed Amendment Application. Information sources drawn upon, include:

- Amendment Application (various chapters);
- Chapter 4.0 Tahltan Risk Assessment Information Requirements, Revision 1 (May 23, 2025);
- Detailed Health Impact Assessment: Red Chris Mine, Newmont Red Chris Mining Ltd. (October, 2025); and
- Community engagement records (see Section Results of Tahltan Engagement5)

### 9.2.1 Project Effects

This section describes expected positive and negative effects from the Block Cave Amendment and summarizes existing effects from the permitted Red Chris Mine. The effects from the Block Cave Amendment, as described by NRCML in the Amendment Application are included and added to, considering the Tahltan perspective and considering each effect at different spatial scales and AOIs. It is important to note that as there is overlap in the AOIs, the effects may be considered relevant across multiple AOIs. Effects identified may be predicted for any stage of the Block Cave Amendment (e.g. construction, operations, closure, and post-closure).



#### 9.2.1.1 Description of Block Cave Amendment Components and Activities

A full description of the proposed Block Cave Amendment is set out in Section 4.2. The following components of the Block Cave Amendment drive the potential for adverse effects to Tahltan:

General construction activities;

- Disturbance of an additional 57 ha of land beyond the currently permitted mine footprint;
- The development of a permanent subsidence zone under the existing open pit footprint (centered below the east pit);
- Ongoing and permanent tailings and water management and tailings impoundment area operations (currently permitted, but continuing through Block Cave);
- Increase in site workforce during the construction phase and expansion of the camp occupancy by approximately 300 workers;
- Increased road traffic on Highway 37 due to the inflow of equipment and material during construction and increasing transportation of concentrate during operations; and
- Closure and post-closure activities, including decommissioning and removal of infrastructure and long-term maintenance of the on-site infrastructure and perpetual water treatment and management.

#### 9.2.1.2 Adverse Effects

The following is a list of effects from the Block Cave Amendment that are described in the Amendment Application, organized per Tahltan Value. These effects will be further characterized to determine their severity in Section 9.3. The list is inclusive of all AOIs assessed, and a breakdown of effects to be further characterized per AOI is shown in Table 18. Not all effects will be felt in all AOIs, and some effects may be of minimal severity in some AOIs (to be determined in 9.3.).

Effects listed in this section focus on effects of the Block Cave Amendment. As per the Tahltan Impact Assessment Policy, the effects from the proposed Block Cave Amendment are in addition to existing effects of the Red Chris Mine as permitted. The current Red Chris Mine has contributed to ongoing alienation of Tahltan from their land and culture, impacting Tahltan’s ability to maintain a strong relationship with the land and waters. See Section 9.2.1.4 for a more comprehensive list of existing impacts currently being experienced by Tahltan and Tahltan members and see Sections 9.3 - 9.6 for an assessment of Block Cave Amendment potential effects as additive to existing effects.

While effects are listed per Tahltan Value, the TCG Lands Department recognizes that many effects reach beyond the categorization or Tahltan Value assigned. Assigning effects per value is a tool to support one portion of the assessment methodology, namely the “characterization” of effects per value in Section 9.3, and to support collaboration efforts with NRCML and BC. As per the Tahltan Impact Assessment Policy, best efforts are made throughout the assessment to consider the interconnected nature of effects, and that all effects are cumulative in nature. Assessment of severity of effects per AOI, considering Tahltan Core Priorities and TSP Management Directions, and answering Tahltan Risk Assessment Factors and Tahltan Sustainability Requirements holistically summarize effects to Tahltan.

The following adverse effects have been identified for the proposed Block Cave Amendment, described by Tahltan Value:

**Groundwater** – Groundwater contamination due to seepage from the TIA and RSA are expected to be similar but not identical for the Block Cave Amendment as currently predicted and experienced with the open pit. Some groundwater quality conditions will improve in the long term due to reduction in size of the RSA, and some change in timing of groundwater effects will occur due to changes in production volumes, timing, and closure flooding of the open pit and underground areas. Groundwater impacts are expected to stay within the Local Assessment Area (LAA), roughly similar to the Red Chris Mine AOI, though mine seepage to groundwater will eventually discharge to surface water, either locally or regionally (see surface water value below). No impacts to groundwater wells in Iskut are expected.

Changes in Groundwater Quantity including Flow and Water Table:

- During Block Cave operations, dewatering activities will lower the water table within the Red Chris AOI, and this will last until project closure (roughly 2041), when it is expected to slowly begin to return to predevelopment conditions as the open-pit and block cave floods (60-80 years)

Changes to Groundwater Quality:

- Seepage from TIA and RSA, may be long term through post-closure, but will be contained within catchment basin/ Red Chris Mine AOI.

Interactions with Surface Water:

- Seepage from Tailings Impoundment Area (TIA) and RSA, may be long term through post-closure, and is modeled to be contained within catchment basins within the LAA (roughly similar to the Red Chris Mine AOI).

**Surface Water** – Water is extremely important to Tahltan culture and the exercise of Tahltan's Rights and Title, and extends to activities such as recreation, fishing, and spiritual practices. Impact to groundwater (above) will eventually appear in surface waters and may extend beyond the LAA/Red Chris Mine AOI. Impacts to mental and spiritual health and Tahltan way of life can occur when water is impacted or perceived to be impacted.

Changes in Streamflow:

- Onsite water management regimes such as seepage interception systems and changes in precipitation regimes from climate change are predicted to affect streamflow in several creeks.
- Models also predict a period of extremely high stream flows at closure associated with the cessation of dewatering activities in the Block Cave, beyond natural extent and duration, which, if realized, could have the potential to effect downstream aquatic habitat.

Changes in Surface Water Quality:

- Long-term increases in sulphate, dissolved copper, and total selenium, due to seepage to groundwater, are currently or will eventually impact Quarry Creek, Northeast Arm Creek, Trail Creek, Kluea Lake and Red Rock Canyon Creek with potential exceedances in BC Water Quality Guidelines. These water quality concerns are expected in open pit and Block Cave scenarios, though with different timing of peak concentrations.

**Fish, Fish Habitat, and Aquatic Resources** – Potential for impacts to fish and fish habitat in the Red Chris Mine AOI, and potential interactions with other cumulative stressors on fish in the cumulative AOIs. Real or perceived impacts to fish may lead to reduced harvesting and trust in harvested Tahltan foods. The main fish species of concern are Rainbow Trout and Bull Trout across life stages in Lower Trail Creek, and potentially additional species associated with the Klappan watershed accessing Northeast Arm Creek, especially to access seasonal refuge habitat.

Changes to Fish Health and/or Productivity:

- Potential effects to the fish in Lower Trail Creek and Northeast Arm Creek due to declining water quality.

Changes of Fish Habitat Suitability and Availability:

- Impacts to surface water through contamination (dissolved copper, sulphate, total selenium) may impact fish health and spawning health in the Red Chris Mine AOI. These effects would occur regardless of Block Cave development and have not yet occurred based on monitoring.

**Terrain and Soils** – Most project changes will occur below the land surface in creation of the Block Cave.

Changes to Terrain Stability:

- The Block Cave development will result in a subsidence zone modelled to be largely contained within the existing open pit boundaries, though an estimated 200m exclusion zone will be established to ensure safety.

Changes to Landscape Features:

- A total of 57 hectares will be disturbed additional to the currently permitted footprint as a result of the project within the LAA/Red Chris Mine AOI. The RSA will be smaller than it would be if open pit mining continued, while the flooded pit lake will be deeper.

**Wildlife and Wildlife Habitat** – Small changes to wildlife habitat and health may occur due to changes in other values (e.g. water quality) and increased traffic. Real or perceived impacts to wildlife may lead to reduced harvesting and trust in Tahltan foods.

Increase in wildlife interactions or mortality due to increased traffic:

- Increase in construction traffic and concentrate haul trucks on Highway 37, south of the mine site has the potential to increase wildlife-related traffic incidents.

Changes in wildlife health or productivity:

- Potential effects to wildlife through interactions with surface water and fish, including metal uptake associated with water quality contamination and reduced fish health/productivity.

**Human Health**—Environmental effects may have subsequent effects to human health. The Red Chris Mine has existing impacts on Tahltan wellbeing that may be exacerbated due to an increase in workforce during construction (3 years).

Changes to the Biophysical Determinants of Health due to:

- Changes to surface water quality:
  - Mainly anticipated to be after the end of operations, when treated water will be pumped from the flooded pit to the TIA, impacts mainly limited to the Northeast Arm Creek and Trail Creek.
- Changes to fish health and/or fish productivity, predicted to be limited to the Northeast Arm Creek and Lower Trail Creek.
- Changes to air quality

Changes to human wellbeing due to increase in workforce and associated effects of mine-employment, including effects of the two-week rotation schedule, increased income, family disruption, mental health, and more restricted availability to fulfill cultural roles in the community

**Employment** – The Block Cave amendment will require an increase in site workforce during the construction phase and expansion of the camp occupancy by approximately 300 workers. The Amendment is projected to create a total of 4,036 full time equivalent (FTE) positions in the Regional District of Kitimat Stikine (direct, indirect, induced), with an average of 673 FTEs annually (NRCML 2025c). Operations will require similar employee numbers to current open pit operations. The nature of some jobs on the mine site are expected to change.

Changes to Employment:

- Employment levels will increase during construction and remain similar to current levels during operations. Changes in types of employment will change from those focused on open pit to Block Cave operations.
- Employment will decrease during closure and post-closure, with potential economic impacts for those whose continued employment would be reliant on the proposed Block Cave

Amendment. While some displaced Tahltan workers may find employment with other regional projects at closure, the extent to which future projects will offset job losses remains uncertain, and is dependent on market conditions, permitting timelines, and investment in resource development. This effect further impacts community, family, and individual health.

Changes to Labour Income:

- Tahltan employees at the Red Chris Mine will continue to have relatively higher wages than other Tahltan members, leading to community income disparity. A major decline in income is expected for most Tahltan employees at closure, unless otherwise offset. This effect further impacts community, family, and individual health.

Changes to Regional Economy:

- Increased demand for skilled labour in turn increases pressure on other industry jobs (e.g. construction, forestry) and competing for employees with community essential services (e.g. healthcare, administration, daycare, etc.).

**Infrastructure and Services**—Increased traffic and a temporarily increased construction workforce may have impacts on local and regional infrastructure and services.

Increase in traffic on Highway 37:

- due to increase in construction and concentrate truck traffic, with potential impacts on Tahltan safety, use of land and resources for the exercise of Tahltan Rights and Title, and Peaceful Enjoyment of the Land.

Increase in stress on local health services:

- due to a larger construction workforce and increased probability of offsite medical transfers.

**Use of the Land and Resources for the Exercise of Tahltan Rights** – Changes to the mine site due to Block Cave may result in further restrictions on the exercise of Tahltan’s Title and Rights while Tahltan ability to access and care for the land remains limited.

Further spatial and temporal alienation, including loss of access, in relation to portions of the Red Chris Mine AOI, including Subsidence Zone/Pit Lake

- Multi-generational loss of access to the area of the mine is likely to result in much reduced connection to the area, including lost ability to transfer Tahltan Knowledge about the area, and Tahltan members may not resume use even after closure and post-closure. This effect further impacts the continuation of Tahltan culture, as well as community, family, and individual health across generations.

Changes to the ability to exercise Tahltan governance and to Tahltan’s ability to respect, use, and care for the land and resources over space and time

- A continuation, expansion, and potential for extension of time for loss of access and ability to steward the land in the Red Chris Mine area.

**Social and Cultural Relationship to the Land and Each Other** – Mine conversion to Block Cave may lead to changes of Tahltan relationship to the land and to each other due to real or perceived changes to the mine site and continuation of the alienation of lands being used for the Red Chris Mine.

Disruption to use or avoidance of the mine site and surrounding area due to access restrictions and (real and perceived) risks to Tahltan.

Disruption to community safety due to increased traffic and workforce

- Increased workers on site and in the worker camp increases safety issues, especially for vulnerable populations (women, gender diverse, etc.). This effect further impacts community, family, and individual health.
- A new construction phase and continued operations phase will prolong impacts from increased traffic in the area.

**Peaceful Enjoyment of the Land** – Changes to the Red Chris Mine site will continue to impact Tahltan spiritual and grounded relationship with the land, especially in context of Tahltan Core Priorities that are expected to result in additive negative feelings and experiences for Tahltan people.

- Changes to sensory and spiritual experience of lands and waters due to sensory impacts of the mine and due to knowledge of, concern about, and stress related to a major industrial project and associated risks operating, expanding, and remaining for longer in the Territory. This effect further impacts community, family, and individual health and Tahltan interconnection to values, and relationship with the core priorities.

#### 9.2.1.2.1 Summary of Expected Adverse Effects from the Block Cave Amendment

Effects from the Block Cave Amendment are expected to be felt and experienced differently by Tahltan people, depending on the relationship to Tahltan Values across AOIs and at different spatial and temporal scales. Drawing from Section 9.2.1.2 (Adverse Effects), Table 18 is a summary of adverse effects from the Block Cave Amendment (first two columns), and in which AOIs the expected effect will be further assessed and characterized. Where the Amendment Application predicted a residual adverse effect, these effects are shown with a blue 'X' in Table 18 in the AOIs where they will be carried forward for further characterization. Where the Amendment Application did not predict a residual adverse effect but Tahltan perspectives or technical reviewers justified further characterization, or where Tahltan Values did not align directly with the values assessed in the Amendment Application, these effects are shown with a red 'X' in Table 18.

Where a potential adverse effect is to be further assessed (e.g. where an 'X' of any colour is recorded below), the potential effect is carried forward for severity characterization in Section 9.3.

**Table 18: Summary of Predicted Effects on Tahltan Values per AOI for further Characterization**

Value	Effect	Regional CE AOI	Consent AOI	Communities AOI	Highways AOI	Klappan River AOI	Saddle and Klappan Range AOI	Red Chris Mine AOI
Groundwater	Changes in Groundwater Quantity including Flow and Water Table	X	X			X	X	X
	Changes to Groundwater Quality	X	X			X	X	X
	Interactions with Surface Water	X	X			X	X	X
Surface Water	Changes in Streamflow	X	X			X	X	X
	Changes in Surface Water Quality	X	X			X	X	X
Fish, Fish Habitat, and Aquatic Resources	Changes to fish health and/or productivity	X	X		X	X	X	X
	Changes of Fish Habitat Suitability and Availability	X	X		X	X	X	X
Terrain and Soils	Changes to Terrain Stability	X	X					X
	Change in Landscape Features	X	X					X
Wildlife and Wildlife Habitat	Increase in wildlife interactions or mortality due to increased traffic				X			X
	Potential impacts or cumulative impacts on wildlife and wildlife habitat from changes to water quality and declines in water quality and fish health/productivity							X

Value	Effect	Regional CE AOI	Consent AOI	Communities AOI	Highways AOI	Klappan River AOI	Saddle and Klappan Range AOI	Red Chris Mine AOI
Human Health	Changes to the biophysical determinants of health due to:  Changes to surface water quality;  Changes to fish health and/or fish productivity.  Changes to traditional food quality  Changes to Air Quality	X	X	X				X
	Changes to human wellbeing	X	X	X				X
Employment and Economy	Changes to employment	X	X	X				
	Changes to labour income	X	X	X				
	Changes to regional economy	X	X	X				
Infrastructure and Services	Increase in traffic	X	X	X	X			
	Increased pressure on health services	X	X	X				
Use of the Land and Resources for the Exercise of Tahltan Rights and Title	Alienation, including loss of access, in relation to portions of the subsidence zone and flooded pit lake			X				X
	Changes to the ability to exercise Tahltan governance and Tahltan's ability to use, respect, and care for the land and resources	X	X	X		X	X	X
Social and Cultural Relationship to the Land and Each Other	Disruption to use or avoidance of the mine site and surrounding area due to access restrictions and real and perceived risks	X	X		X			X
	Disruption to real and perceived community safety due to increased traffic and workforce	X	X	X	X			X
Peaceful Enjoyment of the Land	Changes to sensory and spiritual experience of lands and waters	X	X	X	X	X	X	X

### 9.2.1.3 Positive Effects

The proposed Block Cave Amendment also offers potential positive effects. These potential positive effects must be considered alongside the adverse effects. Once adverse effects are characterized in Section 9.3.3, positive effects are considered in Sections 9.4 and beyond.

Key predicted positive effects of the proposed Block Cave Amendment include:

#### Governance

- The requirement for Tahltan consent to any future substantial changes to the Red Chris Mine, as recognized in the Declaration Act Agreement.
- Increased Tahltan governance and involvement with the proposed Block Cave Amendment, as compared to the limited involvement in previous Red Chris Mine approvals.
- Governance and collaborative management role for Tahltan through existing Red Chris Management Agreement (RCMA) with BC (See Section 4.1.3)

- Governance and collaborative management role for Tahltan through the existing IBCA with NRCML (See Section 4.1.3).
- Addendum to the existing IBCA, including provisions for prioritized Tahltan hiring, business opportunities, continuous engagement, and workforce development initiatives (see section 9.5.1.3).

### **Employment and Economy**

- Continued employment benefits from existing the Red Chris Mine
- Increased operations and life of mine timeline certainty, extending employment benefits until 2041. Execution of the Block Cave Amendment and development of 'Macro Block 1' establishes potential for future extensions of the mine via development of additional macro blocks.
- Economic benefits to workers and businesses, particularly during the construction and operations phases

### **Human Health and Environment**

- Overall air quality improvements due to lower expected particulate emissions by relocating operations underground and shifting some operations to electric-powered conveyors. Note air contaminants will be discharging through raised air vents at surface.
- Predicted improved surface water conditions during closure and post-closure Block Cave scenarios as compared to the existing mine closure conditions
- Noise and light emissions for Block Cave Amendment activities will be reduced as the mine moves underground.
- Removal of the Klappan River as an optional water source for the Red Chris Mine, as was approved in original EAC.
- With increased certainty for mine operations with Block Cave (Block Cave operations expected to last 12 years), NRCML has increased time to develop a new closure plan in collaboration with TCG that could better meet Tahltan Sustainability Criteria.
- The size of the open pit mine will be smaller than originally permitted, but will be deeper.
- The size of the Rock Storage Area (RSA) will be smaller than would be with continued open pit operations

#### **9.2.1.4 Existing Adverse Effects of the Red Chris Mine as Permitted**

As described in Section 9.1.4.7, Current and Future Conditions of the Red Chris Mine AOI, existing impacts of the mine are present and will continue to be experienced by Tahltan. Key effects listed below are considered by the TCG Lands Department to be residual from the current operations of the mine and will be considered as additive to the proposed Block Cave Amendment effects in Sections 9.3.3, 9.4, and 9.6 to ensure that a holistic perspective on effects informs the Tahltan Risk Assessment.

Existing Adverse Impacts of the Permitted Red Chris Mine:

- Disruption to use or avoidance of the mine site and surrounding area due to access restrictions and (real and perceived) risks to Tahltan peoples and core priorities;
- Long-term alienation of portions of the mine site given permanent alterations to the landscape including the cascading impacts to connection to Keyeh, Kinship, Kotah, Tahltan Knowledge, and cultural practices connected with the Todagin Plateau and adjacent mountain blocks;
- Alterations to Tahltan's relationship to the land and ecosystem health and function;

- Loss of wildlife habitat and exclusion of wildlife from the mine site, avoidance of habitat surrounding the mine site and access road and highways due to sensory disruption for wildlife;
- Long-term impacts to groundwater and surface water quality;
- (Real and/or perceived) Long-term impacts to fish and wildlife health, including through the uptake of metals;
- (Real and/or perceived) Long-term impacts to human health as a result of contaminated lands, waters, fish, and wildlife;
- Permanent destruction of archaeological sites;
- Changes to Tahltan's ability to take part in socio-cultural practices throughout Keyeh and cascading socio-cultural, individual and family health, and community wellbeing effects driven in part by the worker rotational schedule;
- Changes in food security and ability to harvest from the lands and waters due to (real and/or perceived) risk of contamination of resources and restricted access to previously highly-used harvesting area;
- Disruption to (real and perceived) community safety due to increased traffic and workforce;
- Loss of and alterations to physical and spiritual oneness with Keyeh;
- Changes to sensory and spiritual experience of lands and waters in vicinity of the mine site;
- Long-term stress and associated effects to individuals, families, and community wellbeing associated with knowledge and awareness of a major project and associated risks and accidents and malfunctions, including the potential for major catastrophic events, including dam failure; and
- Income disparity within the Tahltan communities, given relatively high-paying mining employment

#### **9.2.1.5 Existing Positive Effects of the Red Chris Mine as Permitted**

Though the Tahltan Risk Assessment focuses on characterizing adverse effects of the proposed Block Cave Amendment, which are considered as additive to existing adverse effects, potential positive effects of the Block Cave Amendment (listed in Section 9.2.1.3) will also be additive to the existing benefits to Tahltan members, communities, and the region more generally. The existing Red Chris Mine employs approximately 200 Tahltan members, holds contracts with Tahltan businesses including the Tahltan Nation Development Corporation (TNDC), and delivers benefits to Tahltan through terms of the IBCA. NRCML provides other regional benefits through employment, participation in the Industry Working Group, provision of emergency and medivac response, and direct contributions to the Tahltan communities. See Sections 9.4.1.1.3 and 9.4.1.1.4 for further detail.

##### **9.2.1.5.1 Additional Context and Potential Effects to Consider**

Guided by Tahltan Risk Assessment Factors and Tahltan Sustainability Requirements, other potential effects of the Block Cave Amendment should be considered as additive effects to the current context and are described below.

##### **9.2.1.5.1.1 Risks of Accidents and Malfunctions**

The Red Chris Mine maintains a Mine Emergency Response Plan (MERP) as per Section 3.7.1 of the Health, Safety, and Reclamation Code of BC. Further to the code, the Red Chris Mine has an Emergency Preparedness and Response Plan (EPRP) specifically for the TIA. A Maintenance and Emergency Response Plan (MEERP) is further required under their PE-105017 Discharge Permit from the Ministry of Environment, and an Emergency Spill Response Plan is required by their current M240 permit which details responses to unexpected events that pose a risk to human health and safety, property, and/or the environment. As part of their Amendment Application to convert the mine to Block Cave, NRCML assessed the potential for any additional risks associated with Block Cave mining that are not already actively managed by these plans on the mine site, including:

- Uncontrolled ingress of water and/or solids into underground workings;
- Underground instability;

- Surface instability;
- Power failure for underground workings; and
- Fires and explosions within underground workings.

Each credible worst-case scenario associated with the above failure modes were assessed against the potential risk and consequences for environmental, social, health and safety, economic, and cultural values. Management measures to address the potential failure scenarios listed above are included in the Amendment Application and will largely be regulated under the Mines Act M240 permit, including the requirement for a Ground Control Management Plan (GCMP) and Cave Management Plan, along with other supporting emergency response plans such as: Inundation or Inrush Management Plan; Inrush Trigger Action Response Plan; and Expansion Void or Air Blast Management Plan.

Overall, the assessment found that some scenarios could have extreme consequences (e.g. multiple fatalities) with these potential accidents associated with underground air blasts, mudrushes, fires or flooding. These high-consequence failures were rated to be 'unlikely'. Those failures rated as more possible (e.g. power failures, subsidence exceeding predictions) had lower potential consequences and a higher ability to control outcomes with strong management measures, including an estimated 200m exclusion zone to be established surrounding the subsidence zone. To address potential underground risks, NRCML recognized, "new controls in alignment with the HSRC and Newmont global standards are anticipated to be required to avoid or mitigate the risks associated with Project activities anticipated to be performed underground". These new controls are to be developed during the Block Cave permitting phase and include development of a number of management plans to reduce the risk of accidents and malfunctions.

#### 9.2.1.5.1.1.1 Tailings Dams

The proposed conversion to Block Cave mining will not change design of the TIA or tailings dams. However, given the potential catastrophic impacts of a tailings dam breach on Tahltan Territory and members, TCG asked NRCML to include some general information in the Amendment Application to describe the work done at the Red Chris Mine to assess the potential for a tailings dam failure. An excerpt from the Amendment Application describing the general context of the dams is below:

*"A dam breach inundation study was prepared by BGC Engineering (BGC 2014) following the Dam Safety Guidelines by the Canadian Dam Association (CDA 2007) to model the potential consequences of hypothetical dam failures on areas downstream of the TIA. The dam breach and inundation analysis completed for the North, South and Northeast dams was based on hypothetical modes of failure under highly unlikely conditions. The results of the analysis show that the breach of a dam could result in adverse impacts, in some cases significant, along potential flood routes towards the North of the TIA affecting Quarry Creek, NEA Creek, Klappan River and Stikine River; and along potential flood routes towards the South of the TIA affecting Trail Creek, Kluea Lake, Todagin Lake, Tatogga Lake, Eddontenajon Lake, Kinaskan Lake and Iskut River."*

The Amendment Application further details the management systems in place to maintain the TIA dams, which include:

- Retention of a qualified Engineer of Record (EoR) to oversee all key aspects of tailings management (BGC Engineering Inc. [BGC]);
- Establishment of an Independent Tailings Review Board (ITRB) to provide expert technical guidance to all aspects of the design, construction, operation, closure, and post-closure planning for the TIA;
- Management of the TIA in accordance with the HSRC (BC Gov 2022);
- Preparation of a Dam Breach and Inundation Study, which was conducted by BGC (2014) and used to support development the Red Chris Mine Emergency Preparedness and Response Plan (EPRP);
- Submission of Dam Safety Inspection reports annually, which are prepared by the EoR. These reports include the results of annual inspections performed by the EoR and other trained professionals on the various dams and ancillary structures associated with the Red Chris TIA; and

- Development of the Red Chris TIA Operation, Maintenance, and Surveillance (OMS) Manual, which is updated annually. The OMS Manual contains the Red Chris Mine EPRP as Appendix O (RCDC 2014).

Finally, in community-outreach materials prepared by NRCML, they identify the key differences between the Red Chris Mine TIA Dams and the Mount Polley dam that failed in 2014 including:

- “The behavior of the materials in the foundations under the dams of the TIA are well understood; they have been extensively drilled and sampled”;
- “Our water management strategy is to operate the TIA below its design for standing water volumes”; and,
- “We maintain a beach or separation between the tailings and the middle of each dam to ensure water is not directly against the dam (the South dam minimum requirement is 300 metres of beach and the North dam minimum requirement is 100 metres)”.

#### 9.2.1.5.1.1.2 *Fall of Ground Event*

On July 22, 2025, two sequential Fall of Ground (FoG) events occurred at the Red Chris Mine in the already permitted decline tunnel at 200m along the access decline, trapping 3 drillers belowground. The drillers had been directed to the nearest refuge chamber after the first event, following which a larger FoG event occurred, cutting off communications. NRCML enacted emergency response procedures, mobilized all resources and personnel, received support of experts and specialized equipment, and managed to remotely excavate debris and rescue the trapped drillers on July, 24, 2025. The three men had followed emergency procedures and were found in good health. Despite the positive outcomes, the event was a sobering lesson on the potential for unanticipated accidents for NRCML, employees, contractors, and for Tahltan members experiencing the stress of the incident.

Following the FoG rescue, NRCML was required to undertake an internal investigation within 60 days as to the cause of the incident. Further, the Mines Investigation Unit of BC’s Office of the Chief Inspector launched a provincially-led investigation. The provincial investigation is ongoing, and could take up to two years to complete. TCG/THREAT has now reviewed NRCML’s internal investigation report. The report highlights several, compounding issues that led to the event, including:

- The failure itself resulted from deterioration of the rock condition over time (time-dependent deterioration), and installed ground support becoming overloaded; and,
- Standards for ground support management used at the time of construction do not meet Newmont’s standards.

As a result, NRCML continues to work to rehabilitate the decline and re-assess all already-excavated areas to ensure they meet Newmont standards. This work includes:

- Re-assessing installed ground support based on as-built data and installing additional or alternate ground support based on that reassessment;
- Ensuring a site-based geotechnical resource is available at the Block Cave Amendment; and
- Implementing geotechnical hazard maps for the Block Cave Amendment.

NRCML has further committed to actions to improve emergency underground response, including: ensuring secondary means for communications, power, and air, increase contingency measures, and ensuring refuge chambers are fitted with air quality monitors and detection systems.

TCG/THREAT geotechnical and block cave subject matter experts reviewed NRCML’s internal report, and largely agreed with the findings. Several of the procedural issues highlighted, including the need for ongoing mapping of exposed faces during excavation, had been requested by TCG/THREAT and had been implemented since the FoG area was originally excavated. Additional recommendations, including more consistent oversight and review of geotechnical and block cave findings by the TCG/THREAT subject matter experts, have been enacted.

#### 9.2.1.5.1.2 *Closure and Reclamation*

Closure of the Red Chris Mine must be considered as a cumulative, whole-site process involving the existing open pit mine, associated infrastructure, and the proposed Block Cave Amendment. The long-term environmental and cultural risks associated with the Red Chris Mine are determined not only by the operation

of individual mine components but by how all permanent mine features interact during closure and post-closure conditions.

The Red Chris Mine site already contains large-scale engineered landforms and infrastructure associated with the existing open pit operation, including the tailings impoundment area, rock storage areas, the open pit, and associated water management systems. Conversion of the mine to Block Cave mining will introduce additional permanent features, including a subsidence zone and associated changes to groundwater flow pathways and surface landform stability. At closure, these features will exist simultaneously and must therefore be evaluated collectively as a single integrated mine system.

From a closure perspective, the Red Chris Mine will remain a permanent modification to the landscape. While progressive reclamation measures can reduce some environmental effects, several mine components will remain on the landscape indefinitely. These include the flooded tailings impoundment area and dam infrastructure, the pit lake, rock storage areas, engineered landforms, subsidence zones associated with Block Cave mining, and water management infrastructure required to control water levels and maintain water quality.

### 9.3 STEP 3: HOW SEVERE COULD THE EFFECTS FROM THE PROJECT BE?

This section presents the severity of adverse effects from the proposed Block Cave Amendment on Tahltan Values by AOI, considering all phases of the Block Cave Amendment (construction, operations, closure, and post-closure). These severity ratings in Table 19 to Table 25 (Low, Low to Moderate, Moderate, Moderate to High, and High) are determined based on expert technical knowledge of the THREAT team, in consideration of NRCML’s characterizations and proposed mitigation measures as described in the Amendment Application and as per definitions for characterizations of effects in Section 3.9.2.2. Characterizations further considered the scale or AOI being assessed and the key purpose and driver for each AOI as listed in 9.1.2. In Table 26: Summary of Severity of Effects per Tahltan Value, the average of the assessment of effects is taken after reviewing the severity for each AOI and AOIs with highest severity are highlighted.

Severity is further considered holistically in Table 27 by examining potential changes of the Amendment to the Tahltan Core Priorities across the AOIs, considering direction of the Tahltan Stewardship Plan and incorporating Tahltan Knowledge, Tahltan member perspectives, and technical input.



#### 9.3.1 Severity Assessment of Potential Effects

For each AOI, an overall severity rating is presented for each Tahltan Value relating to the proposed Block Cave Amendment effect in Table 19 to Table 25 below.

9.3.1.1 Regional Cumulative Effects AOI

Table 19: Severity of Effects on Tahltan Values in the Regional Cumulative Effects AOI

Tahltan Value	Effect	Proposed Mitigation Measures	Tahltan Significance Factors / Characterizations	Overall Severity of Adverse Effect
Groundwater	Changes in Groundwater Quantity including Flow and Water Table	Groundwater monitoring to observe changes resulting from Project activities and continued adaptive management of site wide water and seepage management systems. Closure and post-closure stage water management systems, including active treatment.	Context: Healthy Magnitude: Low Extent/Scale: Local Duration: Short-term Reversibility: Fully reversible Frequency: Continuous Affected Populations: Disproportionate Confidence in information and contingencies: High Risk and Uncertainty: Low	Low
	Interactions with Surface Water	Tailings Impoundment Area (TIA) and RSA Seepage Interception (current and planned expansions)	Context: Healthy Magnitude: Low to moderate Extent/Scale: Local Duration: Long-term Reversibility: Partially reversible Frequency: Continuous Affected Populations: Disproportionate Confidence in information and contingencies: Moderate Risk and Uncertainty: Moderate	Low
	Changes to Groundwater Quality	Tailings Impoundment Area (TIA) and RSA Seepage Interception (current and planned expansions)  See Table 11.6-16: Summary of Potential Residual Effects on Groundwater – Groundwater Subcomponent in the Proponent's Section 11.06 for existing mitigation measures.	Context: Healthy Magnitude: Low to Moderate Extent/Scale: Local Duration: Long-term Reversibility: Partially reversible Frequency: Continuous Affected Populations: Disproportionate Confidence in information and contingencies: Moderate Risk and Uncertainty: Moderate	Low
Surface Water	Changes in Streamflow	See Table 11.5-29: Summary of Potential Residual Effects on Surface Water – Surface Water Subcomponent in the Proponent's Section 11.05 for existing mitigation measures. Continued implementation of the existing Mine seepage interception and water management system and on-going improvement expansion information through adaptive management to minimize negative effects on surface water. Closure and post-closure stage water management systems, including active treatment.	Context: Healthy Magnitude: Low Extent/Scale: Local Duration: Short-term Reversibility: Fully reversible Frequency: Continuous Affected Populations: Disproportionate Confidence in information and contingencies: Low to moderate Risk and Uncertainty: Low	Low
	Changes in Surface Water Quality	See Table 11.5-29: Summary of Potential Residual Effects on Surface Water – Surface Water Subcomponent in the Proponent's Section 11.05 for existing mitigation measures.	Context: Healthy Magnitude: Low to Moderate Extent/Scale: Regional	Low-Moderate

Tahltan Value	Effect	Proposed Mitigation Measures	Tahltan Significance Factors / Characterizations	Overall Severity of Adverse Effect
			Duration: Long-term Reversibility: Partially reversible Frequency: Continuous Affected Populations: Disproportionate Confidence in information and contingencies: Low to Moderate Risk and Uncertainty: Moderate to High	
<b>Fish, Fish Habitat, and Aquatic Resources</b>	Changes to fish health and/or productivity	See Table 11.7-19: Summary of Potential Residual Effects on Fisheries and Aquatic Resources – Fisheries and Aquatic Resources Subcomponent in the Proponent’s Section 11.07 for existing mitigation measures.	Context: Healthy Magnitude: Low to Moderate Extent/Scale: Local Duration: Long-term Reversibility: Partially reversible Frequency: Continuous Affected Populations: Disproportionate Confidence in information and contingencies: Low to Moderate Risk and Uncertainty: Low	<b>Low to Moderate</b>
	Changes of Fish Habitat Suitability and Availability	See Table 11.7-19: Summary of Potential Residual Effects on Fisheries and Aquatic Resources – Fisheries and Aquatic Resources Subcomponent in the Proponent’s Section 11.07 for existing mitigation measures.	Context: Healthy Magnitude: Low Extent/Scale: Local Duration: Medium-term Reversibility: Partially reversible Frequency: Continuous Affected Populations: Disproportionate Confidence in information and contingencies: Moderate Risk and Uncertainty: Low	<b>Low to Moderate</b>
<b>Terrain and Soils</b>	Changes to Terrain Stability	Expansion of erosion, sediment, stability, and drainage controls within areas of additional or new disturbance.  See Table 11.8-10: Summary of Potential Residual Effects on Soil, Landscape, and Terrain – Soil, Landscape, and Terrain Subcomponent in the Proponent’s Section 11.08 for existing mitigation measures. Use of controlled caving techniques to manage the rate and direction of cave propagation and reduce cave-induced seismicity. Implementation of Safety Management Plan, including hazard assessment protocols and safety monitoring and warning systems.	Context: Healthy Magnitude: Low Extent/Scale: Local Duration: Long-term Reversibility: Irreversible Frequency: Periodic Affected Populations: Disproportionate Confidence in information and contingencies: Low Risk and Uncertainty: High	<b>Low</b>
	Change in Landscape Features	See Table 11.8-10: Summary of Potential Residual Effects on Soil, Landscape, and Terrain – Soil, Landscape, and Terrain Subcomponent in the Proponent’s Section 11.08 for existing mitigation measures.	Context: Healthy Magnitude: Low Extent/Scale: Local Duration: Medium-term Reversibility: Irreversible Frequency: Once Affected Populations: Disproportionate Confidence in information and contingencies: Moderate Risk and Uncertainty: High	<b>Low</b>

Tahltan Value	Effect	Proposed Mitigation Measures	Tahltan Significance Factors / Characterizations	Overall Severity of Adverse Effect
<b>Human Health</b>	Changes to the biophysical determinants of health due to: <ul style="list-style-type: none"> <li>Changes to surface water quality;</li> <li>Changes to fish health and/or fish productivity.</li> <li>Changes to traditional food quality</li> <li>Changes to Air Quality</li> </ul>	<p>Aquatic Effects Monitoring Program</p> <p>Fugitive Dust and Air Quality Monitoring Program</p> <p>Water Treatment, Tailings and RSA Seepage Interception, Trigger Action Response Plan - See Table 11.5-29: Summary of Potential Residual Effects of the Project on Surface Water– Surface Water Subcomponent in the Proponent’s Section 11.5.9 for existing and proposed new mitigation measures.</p> <p>Water Treatment, Tailings and RSA Seepage Interception - See Table 11.7-27: Summary of Potential Residual Effects on Fisheries and Aquatic Resources– Fisheries and Aquatic Resources Subcomponent in the Proponent’s Section 11.7.12.5 for existing and proposed new mitigation measures.</p> <p>The existing mitigation measures identified by the Fish and Wildlife Subcomponents are expected to assist in the protection of human health indirectly through protection of fish and wildlife health that may be consumed as traditional foods.</p>	<p>Context: Healthy</p> <p>Magnitude: Low</p> <p>Extent/Scale: Local</p> <p>Duration: Medium-term</p> <p>Reversibility: Partially reversible</p> <p>Frequency: Continuous</p> <p>Affected Populations: Disproportionate</p> <p>Confidence in information and contingencies: Moderate</p> <p>Risk and Uncertainty: Low</p>	<b>Low</b>
	<ul style="list-style-type: none"> <li>Changes to human wellbeing</li> </ul>	<p>The existing mitigation measures identified by the Community Wellbeing subcomponent are expected to assist in the protection of human wellbeing through the Employee Leave policies, the Impact Benefit Co-management Agreement, Diversity and Inclusion Programs, and Independent Workforce Counselling.</p>	<p>Context: Healthy to Compromised</p> <p>Magnitude: Low</p> <p>Extent/Scale: Regional</p> <p>Duration: Medium-term</p> <p>Reversibility: Partially reversible</p> <p>Frequency: Continuous</p> <p>Affected Populations: Even/Disproportionate</p> <p>Confidence in information and contingencies: Low to Moderate</p> <p>Risk and Uncertainty: Low to Moderate</p>	<b>Low</b>
<b>Employment and Economy</b>	Changes to employment	<p>Workforce Transition Plan</p> <p>See Table 11.11-34: Summary of Potential Residual Effects on Employment and Economy Employment and Economy Subcomponent in the Proponent’s Section 11.11 for existing mitigation measures.</p> <p>IBCA with TCG with preferred hiring, royalties, training, contracting and capacity development commitments</p> <p>Existing employee support programs</p>	<p>Context: Healthy to Compromised</p> <p>Magnitude: Low</p> <p>Extent/Scale: Regional</p> <p>Duration: Short-term</p> <p>Reversibility: Partially reversible</p> <p>Frequency: Continuous</p> <p>Affected Populations: Disproportionate</p> <p>Confidence in information and contingencies: High</p> <p>Risk and Uncertainty: Moderate</p>	<b>Low</b>
	Changes to labour income	<p>See Table 11.11-34: Summary of Potential Residual Effects on Employment and Economy – Employment and Economy Subcomponent in the Proponent’s Section 11.11 for existing mitigation measures.</p>	<p>Context: Healthy to Compromised</p> <p>Magnitude: Low</p> <p>Extent/Scale: Regional</p> <p>Duration: Short-term</p> <p>Reversibility: Partially reversible</p> <p>Frequency: Continuous</p> <p>Affected Populations: Disproportionate</p> <p>Confidence in information and contingencies: High</p> <p>Risk and Uncertainty: Moderate</p>	<b>Low</b>
	Changes to regional economy	<p>Ongoing Communication with LAA Partners and RAA Mining Industry and Economic Development Organizations</p>	<p>Context: Healthy to Compromised</p> <p>Magnitude: Low</p>	<b>Low</b>

Tahltan Value	Effect	Proposed Mitigation Measures	Tahltan Significance Factors / Characterizations	Overall Severity of Adverse Effect
		See Table 11.11-34: Summary of Potential Residual Effects on Employment and Economy – Employment and Economy Subcomponent in the Proponent’s Section 11.11 for existing mitigation measures.	Extent/Scale: Regional Duration: Short-term Reversibility: Fully reversible Frequency: Continuous Affected Populations: Disproportionate Confidence in information and contingencies: High Risk and Uncertainty: Moderate	
<b>Infrastructure and Services</b>	Increase in traffic	Offsite Ground Transportation Management Plan, IBCA, Feedback and Grievance Mechanism- See Section 11.12.9.2 – Potential Effect 3 Increased Traffic along Public Roads – Infrastructure and Services Subcomponent in the Proponents Section 11.12.9 for effects management.	Context: Healthy to Compromised Magnitude: Moderate Extent/Scale: Regional Duration: Medium-term Reversibility: Fully reversible Frequency: Continuous Affected Populations: Even Confidence in information and contingencies: Medium Risk and Uncertainty: Moderate	<b>Moderate</b>
	Increased pressure on health services	Camp accommodation On-site health services.  Drug and Alcohol Policy and Substance Misuse Prevention Programs, Communicable Disease Management Plan, HMSP, EAP - See Section 11.12.9.1 – Potential Effect 2 Changes to Demand on Local Supporting Infrastructure and Community Services – Infrastructure and Services Subcomponent in the Proponents Section 11.12.9 for effects management.	Context: Compromised Magnitude: Low Extent/Scale: Regional Duration: Medium-term Reversibility: Reversible Frequency: Continuous Affected Populations: Disproportionate Confidence in information and contingencies: Low-moderate Risk and Uncertainty: Moderate	<b>Low-Moderate</b>
<b>Use of the Land and Resources for the Exercise of Tahltan Rights and Title</b>	Changes to the ability to exercise Tahltan governance and Tahltan’s ability to use, respect, and care for the land and resources	See Section 11.10.9: Effects Management– Wildlife and Wildlife Habitat Subcomponent in the Proponent’s Section 11.10 for existing mitigation measures.  See Section 11.13.2.9: Existing Mitigation – Human Health Subcomponent in the Proponent’s Section 11.13 for existing mitigation measures.	Context: Compromised Magnitude: Moderate Extent/Scale: Regional Duration: Long-term Reversibility: Partially reversible Frequency: Continuous Affected Populations: Even Confidence in information and contingencies: Moderate Risk and Uncertainty: Moderate	<b>Moderate</b>
<b>Social and Cultural Relationship to the Land and Each Other</b>	Disruption to use or avoidance of the mine site and surrounding area due to access restrictions and real and perceived risks	See Section 11.15.9: Effects Management – Culture Subcomponent in the Proponents Section 11.15.9.1.1 and Section 11.15.9.1.2 for existing mitigation measures.	Context: Compromised Magnitude: Moderate Extent/Scale: Local Duration: Long-term Reversibility: Partially reversible Frequency: Continuous Affected Populations: Disproportionate Confidence in information and contingencies: Moderate Risk and Uncertainty: High	<b>Moderate</b>

Tahltan Value	Effect	Proposed Mitigation Measures	Tahltan Significance Factors / Characterizations	Overall Severity of Adverse Effect
	Disruption to real and perceived community safety due to increased traffic and workforce	<p>Offsite Transportation Management Plan Site Safety Initiatives for the Safety of Women</p> <p>See Section 11.10.9: Effects Management – Wildlife and Wildlife Habitat Subcomponent in the Proponent's Section 11.10 for existing mitigation measures.</p>	<p>Context: Compromised Magnitude: Low to Moderate Extent/Scale: Regional Duration: Long-term Reversibility: Reversible Frequency: Continuous Affected Populations: Disproportionate Confidence in information and contingencies: Low Risk and Uncertainty: Moderate</p>	<b>Low</b>
<b>Peaceful Enjoyment of the Land</b>	Adverse changes to sensory and spiritual experience of lands and waters	<p>Grievance Reporting and Adaptive Management</p> <p>Offsite Transportation Management Plan</p> <p>Tailings Impoundment Area (TIA) Seepage Interception (current and planned expansions)</p> <p>See Table 11.6-16: Summary of Potential Residual Effects on Groundwater – Groundwater Subcomponent in the Proponent's Section 11.06 for existing mitigation measures.</p> <p>See Table 11.5-26: Summary of Potential Residual Effects on Surface Water – Surface Water Subcomponent in the Proponent's Section 11.05 for existing mitigation measures.</p> <p>See Table 11.7-19: Summary of Potential Residual Effects on Fisheries and Aquatic Resources – Fisheries and Aquatic Resources Subcomponent in the Proponent's Section 11.07 for existing mitigation measures.</p> <p>See Section 11.10.9: Effects Management – Wildlife and Wildlife Habitat Subcomponent in the Proponent's Section 11.10 for existing mitigation measures.</p>	<p>Context: Compromised to Impacted Magnitude: Moderate Extent/Scale: Local Duration: Long-term Reversibility: Irreversible Frequency: Continuous Affected Populations: Disproportionate Confidence in information and contingencies: Moderate Risk and Uncertainty: High</p>	<b>Moderate</b>

9.3.1.2 Consent Area Cumulative Effects AOI

Table 20: Severity of Effects on Tahltan Values in the Consent Area AOI

Tahltan Value	Project Effect	Proposed Mitigation Measure(s)	Tahltan Significance Factors / Characterizations	Overall Severity of Adverse Effect
<b>Groundwater</b>	Changes in Groundwater Quantity including Flow and Water Table	Groundwater monitoring to observe changes resulting from Project activities and continued adaptive management of site wide water and seepage management systems. Closure and post-closure stage water management systems, including active treatment.	Context: Healthy Magnitude: Low Extent/Scale: Local Duration: Short-term Reversibility: Fully reversible Frequency: Continuous to Periodic Affected Populations: Disproportionate Confidence in information and contingencies: High Risk and Uncertainty: Low	<b>Low</b>
	Interactions with Surface Water	Tailings Impoundment Area (TIA) and RSA Seepage Interception (current and planned expansions)	Context: Healthy to Compromised Magnitude: Low to Moderate Extent/Scale: Regional Duration: Long-term Reversibility: Partially reversible Frequency: Continuous to Periodic Affected Populations: Disproportionate Confidence in information and contingencies: Low to Moderate Risk and Uncertainty: Moderate to High	<b>Moderate</b>
	Changes to Groundwater Quality	Tailings Impoundment Area (TIA) and RSA Seepage Interception (current and planned expansions)  See Table 11.6-16: Summary of Potential Residual Effects on Groundwater – Groundwater Subcomponent in the Proponent’s Section 11.06 for existing mitigation measures.	Context: Healthy to Compromised Magnitude: Low to Moderate Extent/Scale: Regional Duration: Long-term Reversibility: Partially reversible Frequency: Continuous to Periodic Affected Populations: Disproportionate Confidence in information and contingencies: Low to Moderate Risk and Uncertainty: Moderate to High	<b>Moderate</b>
<b>Surface Water</b>	Changes in Streamflow	See Table 11.5-29: Summary of Potential Residual Effects on Surface Water– Surface Water Subcomponent in the Proponent’s Section 11.05 for existing mitigation measures. Continued implementation of the existing Mine seepage interception and water management system and on-going improvement expansion information through adaptive management to minimize negative effects on surface water. Closure and post-closure stage water management systems, including active treatment.	Context: Healthy Magnitude: Low Extent/Scale: Local Duration: Short-term Reversibility: Fully reversible Frequency: Continuous Affected Populations: Disproportionate Confidence in information and contingencies: High Risk and Uncertainty: Low	<b>Low</b>
	Changes in Surface Water Quality (Changes to Concentrations of	See Table 11.5-29: Summary of Potential Residual Effects on Surface Water– Surface Water Subcomponent in the Proponent’s Section 11.05 for existing mitigation measures.	Context: Healthy to Compromised Magnitude: Low to Moderate Extent/Scale: Regional	<b>Moderate</b>

Tahltan Value	Project Effect	Proposed Mitigation Measure(s)	Tahltan Significance Factors / Characterizations	Overall Severity of Adverse Effect
	Parameters of Concern in Natural Waterbodies)		Duration: Medium- to Long-term Reversibility: Partially reversible Frequency: Continuous Affected Populations: Disproportionate Confidence in information and contingencies: Low to Moderate Risk and Uncertainty: Moderate	
<b>Fish, Fish Habitat, and Aquatic Resources</b>	Changes to fish health and/or productivity	See Table 11.7-19: Summary of Potential Residual Effects on Fisheries and Aquatic Resources – Fisheries and Aquatic Resources Subcomponent in the Proponent's Section 11.07 for existing mitigation measures.	Context: Healthy Magnitude: Low to Moderate Extent/Scale: Local Duration: Long-term Reversibility: Partially reversible Frequency: Continuous Affected Populations: Disproportionate Confidence in information and contingencies: Low to Moderate Risk and Uncertainty: Low to Moderate	<b>Low to Moderate</b>
	Changes of Fish Habitat Suitability and Availability	See Table 11.7-19: Summary of Potential Residual Effects on Fisheries and Aquatic Resources – Fisheries and Aquatic Resources Subcomponent in the Proponent's Section 11.07 for existing mitigation measures.	Context: Healthy Magnitude: Low Extent/Scale: Local Duration: Medium-term Reversibility: Partially reversible Frequency: Continuous Affected Populations: Disproportionate Confidence in information and contingencies: Moderate Risk and Uncertainty: Low to Moderate	<b>Low to Moderate</b>
<b>Terrain and Soils</b>	Changes to Terrain Stability	Expansion of erosion, sediment, stability, and drainage controls within areas of additional or new disturbance. See Table 11.8-10: Summary of Potential Residual Effects on Soil, Landscape, and Terrain – Soil, Landscape, and Terrain Subcomponent in the Proponent's Section 11.08 for existing mitigation measures. Use of controlled caving techniques to manage the rate and direction of cave propagation and reduce cave-induced seismicity. Implementation of Safety Management Plan, including hazard assessment protocols and safety monitoring and warning systems.	Context: Healthy Magnitude: Low Extent/Scale: Local Duration: Long-term Reversibility: Irreversible Frequency: Continuous Affected Populations: Disproportionate Confidence in information and contingencies: Low Risk and Uncertainty: High	<b>Low</b>
	Change in Landscape Features	See Table 11.8-10: Summary of Potential Residual Effects on Soil, Landscape, and Terrain – Soil, Landscape, and Terrain Subcomponent in the Proponent's Section 11.08 for existing mitigation measures.	Context: Healthy to Compromised Magnitude: Low Extent/Scale: Local Duration: Long-term Reversibility: Irreversible Frequency: Continuous Affected Populations: Disproportionate Confidence in information and contingencies: Moderate Risk and Uncertainty: High	<b>Low</b>

Tahltan Value	Project Effect	Proposed Mitigation Measure(s)	Tahltan Significance Factors / Characterizations	Overall Severity of Adverse Effect
<b>Human Health</b>	Changes to the biophysical determinants of health due to: <ul style="list-style-type: none"> <li>Changes to surface water quality;</li> <li>Changes to fish health and/or fish productivity.</li> <li>Changes to traditional food quality</li> <li>Changes to Air Quality</li> </ul>	<p>Aquatic Effects Monitoring Program</p> <p>Fugitive Dust and Air Quality Monitoring Program</p> <p>Water Treatment, Tailings and RSA Seepage Interception, Trigger Action Response Plan - See Table 11.5-29: Summary of Potential Residual Effects of the Project on Surface Water– Surface Water Subcomponent in the Proponent’s Section 11.5.9 for existing and proposed new mitigation measures.</p> <p>Water Treatment, Tailings and RSA Seepage Interception - See Table 11.7-27: Summary of Potential Residual Effects on Fisheries and Aquatic Resources– Fisheries and Aquatic Resources Subcomponent in the Proponent’s Section 11.7.12.5 for existing and proposed new mitigation measures.</p> <p>The existing mitigation measures identified by the Fish and Wildlife Subcomponents are expected to assist in the protection of human health indirectly through protection of fish and wildlife health that may be consumed as traditional foods.</p>	<p>Context: Healthy</p> <p>Magnitude: Low</p> <p>Extent/Scale: Regional</p> <p>Duration: Medium-term</p> <p>Reversibility: Partially reversible</p> <p>Frequency: Continuous</p> <p>Affected Populations: Disproportionate</p> <p>Confidence in information and contingencies: Moderate</p> <p>Risk and Uncertainty: Low</p>	<b>Low</b>
	<ul style="list-style-type: none"> <li>Changes to human wellbeing</li> </ul>	<p>The existing mitigation measures identified by the Community Wellbeing subcomponent are expected to assist in the protection of human wellbeing through the Employee Leave policies, the IBCAt, Diversity and Inclusion Programs, and Independent Workforce Counselling.</p>	<p>Context: Healthy to Compromised</p> <p>Magnitude: Low</p> <p>Extent/Scale: Regional</p> <p>Duration: Medium-term</p> <p>Reversibility: Partially reversible</p> <p>Frequency: Continuous</p> <p>Affected Populations: Even/Disproportionate</p> <p>Confidence in information and contingencies: Low to Moderate</p> <p>Risk and Uncertainty: Low</p>	<b>Low</b>
<b>Employment and Economy</b>	Changes to employment	<p>Workforce Transition Plan</p> <p>See Table 11.11-34: Summary of Potential Residual Effects on Employment and Economy Employment and Economy Subcomponent in the Proponent’s Section 11.11 for existing mitigation measures.</p> <p>IBCA with TCG with preferred hiring, royalties, training, contracting and capacity development commitments</p> <p>Existing employee support programs</p>	<p>Context: Healthy to Compromised</p> <p>Magnitude: Low</p> <p>Extent/Scale: Regional</p> <p>Duration: Short-term</p> <p>Reversibility: Partially reversible</p> <p>Frequency: Continuous</p> <p>Affected Populations: Disproportionate</p> <p>Confidence in information and contingencies: High</p> <p>Risk and Uncertainty: Moderate</p>	<b>Low</b>
	Changes to labour income	<p>See Table 11.11-34: Summary of Potential Residual Effects on Employment and Economy – Employment and Economy Subcomponent in the Proponent’s Section 11.11 for existing mitigation measures.</p>	<p>Context: Healthy to Compromised</p> <p>Magnitude: Low</p> <p>Extent/Scale: Regional</p> <p>Duration: Short-term</p> <p>Reversibility: Partially reversible</p> <p>Frequency: Continuous</p> <p>Affected Populations: Disproportionate</p> <p>Confidence in information and contingencies: High</p> <p>Risk and Uncertainty: Moderate</p>	<b>Low</b>
	Changes to regional economy	<p>Ongoing Communication with LAA Partners and RAA Mining Industry and Economic Development Organizations</p>	<p>Context: Healthy to Compromised</p> <p>Magnitude: Low</p>	<b>Low</b>

Tahltan Value	Project Effect	Proposed Mitigation Measure(s)	Tahltan Significance Factors / Characterizations	Overall Severity of Adverse Effect
		See Table 11.11-34: Summary of Potential Residual Effects on Employment and Economy – Employment and Economy Subcomponent in the Proponent’s Section 11.11 for existing mitigation measures.	Extent/Scale: Regional Duration: Short-term Reversibility: Fully reversible Frequency: Continuous Affected Populations: Disproportionate Confidence in information and contingencies: High Risk and Uncertainty: Moderate	
<b>Infrastructure and Services</b>	Increase in traffic	Offsite Ground Transportation Management Plan, IBCA, Feedback and Grievance Mechanism- See Section 11.12.9.2 – Potential Effect 3 Increased Traffic along Public Roads – Infrastructure and Services Subcomponent in the Proponents Section 11.12.9 for effects management.	Context: Healthy to Compromised Magnitude: Moderate Extent/Scale: Regional Duration: Medium-term Reversibility: Fully reversible Frequency: Continuous Affected Populations: Even Confidence in information and contingencies: Medium Risk and Uncertainty: Moderate	<b>Moderate</b>
	Increased pressure on health services	Camp accommodation On-site health services.  Drug and Alcohol Policy and Substance Misuse Prevention Programs, Communicable Disease Management Plan, HMSP, EAP - See Section 11.12.9.1 – Potential Effect 2 Changes to Demand on Local Supporting Infrastructure and Community Services – Infrastructure and Services Subcomponent in the Proponents Section 11.12.9 for effects management.	Context: Compromised Magnitude: Low Extent/Scale: Regional Duration: Medium-term Reversibility: Reversible Frequency: Continuous Affected Populations: Disproportionate Confidence in information and contingencies: Low-moderate Risk and Uncertainty: Moderate	<b>Low-Moderate</b>
<b>Use of the Land and Resources for the Exercise of Tahltan Rights and Title</b>	Changes to the ability to exercise Tahltan governance and Tahltan’s ability to use, respect, and care for the land and resources	See Section 11.10.9: Effects Management – Wildlife and Wildlife Habitat Subcomponent in the Proponent’s Section 11.10 for existing mitigation measures.  See Section 11.13.2.9: Existing Mitigation – Human Health Subcomponent in the Proponent’s Section 11.13 for existing mitigation measures.	Context: Compromised Magnitude: Low to Moderate Extent/Scale: Regional Duration: Long-term Reversibility: Partially reversible Frequency: Continuous Affected Populations: Even Confidence in information and contingencies: Moderate Risk and Uncertainty: Moderate	<b>Moderate</b>
<b>Social and Cultural Relationship to the Land and Each Other</b>	Disruption to use or avoidance of the mine site and surrounding area due to access restrictions and real and perceived risks	See Section 11.15.9: Effects Management – Culture Subcomponent in the Proponents Section 11.15.9.1.1 and Section 11.15.9.1.2 for existing mitigation measures.	Context: Impacted Magnitude: Moderate Extent/Scale: Local Duration: Long-term Reversibility: Partially reversible Frequency: Continuous Affected Populations: Disproportionate Confidence in information and contingencies: Moderate	<b>Moderate</b>

Tahltan Value	Project Effect	Proposed Mitigation Measure(s)	Tahltan Significance Factors / Characterizations	Overall Severity of Adverse Effect
	<p>Disruption to real and perceived community safety due to increased traffic and workforce</p>	<p>Offsite Transportation Management Plan</p> <p>Site Safety Initiatives for the Safety of Women</p> <p>See Section 11.10.9: Effects Management – Wildlife and Wildlife Habitat Subcomponent in the Proponent's Section 11.10 for existing mitigation measures.</p>	<p>Risk and Uncertainty: High</p> <p>Context: Impacted</p> <p>Magnitude: Low to Moderate</p> <p>Extent/Scale: Regional</p> <p>Duration: Long-term</p> <p>Reversibility: Reversible</p> <p>Frequency: Continuous</p> <p>Affected Populations: Disproportionate</p> <p>Confidence in information and contingencies: Low</p> <p>Risk and Uncertainty: Moderate</p>	<p><b>Low to Moderate</b></p>
<p><b>Peaceful Enjoyment of the Land</b></p>	<p>Changes to sensory and spiritual experience of lands and waters</p>	<p>Grievance Reporting and Adaptive Management</p> <p>Offsite Transportation Management Plan</p> <p>Tailings Impoundment Area (TIA) Seepage Interception (current and planned expansions)</p> <p>See Table 11.6-16: Summary of Potential Residual Effects on Groundwater – Groundwater Subcomponent in the Proponent's Section 11.06 for existing mitigation measures.</p> <p>See Table 11.5-26: Summary of Potential Residual Effects on Surface Water – Surface Water Subcomponent in the Proponent's Section 11.05 for existing mitigation measures.</p> <p>See Table 11.7-19: Summary of Potential Residual Effects on Fisheries and Aquatic Resources – Fisheries and Aquatic Resources Subcomponent in the Proponent's Section 11.07 for existing mitigation measures.</p> <p>See Section 11.10.9: Effects Management – Wildlife and Wildlife Habitat Subcomponent in the Proponent's Section 11.10 for existing mitigation measures.</p>	<p>Context: Compromised to Impacted</p> <p>Magnitude: Moderate</p> <p>Extent/Scale: Local</p> <p>Duration: Long-term</p> <p>Reversibility: Irreversible</p> <p>Frequency: Continuous</p> <p>Affected Populations: Disproportionate</p> <p>Confidence in information and contingencies: Low</p> <p>Risk and Uncertainty: High</p>	<p><b>Moderate</b></p>

9.3.1.3 Communities AOI

Table 21: Severity of Effects on Tahltan Values in the Communities AOI

Tahltan Value	Project Effect	Proposed Mitigation Measures	Tahltan Significance Factors / Characterizations	Overall Severity of Adverse Effect
<b>Human Health</b>	<p>Changes to the biophysical determinants of health due to:</p> <ul style="list-style-type: none"> <li>• Changes to surface water quality;</li> <li>• Changes to fish health and/or fish productivity.</li> <li>• Changes to traditional food quality</li> <li>• Changes to Air Quality</li> </ul>	<p>Aquatic Effects Monitoring Program</p> <p>Fugitive Dust and Air Quality Monitoring Program</p> <p>Water Treatment, Tailings and RSA Seepage Interception, Trigger Action Response Plan - See Table 11.5-29: Summary of Potential Residual Effects of the Project on Surface Water– Surface Water Subcomponent in the Proponent's Section 11.5.9 for existing and proposed new mitigation measures.</p> <p>Water Treatment, Tailings and RSA Seepage Interception - See Table 11.7-27: Summary of Potential Residual Effects on Fisheries and Aquatic Resources – Fisheries and Aquatic Resources Subcomponent in the Proponent's Section 11.7.12.5 for existing and proposed new mitigation measures.</p> <p>The existing mitigation measures identified by the Fish and Wildlife Subcomponents are expected to assist in the protection of human health indirectly through protection of fish and wildlife health that may be consumed as traditional foods.</p>	<p>Context: Healthy to Compromised</p> <p>Magnitude: Low</p> <p>Extent/Scale: Local</p> <p>Duration: Medium-term</p> <p>Reversibility: Partially reversible</p> <p>Frequency: Continuous</p> <p>Affected Populations: Disproportionate</p> <p>Confidence in information and contingencies: Moderate</p> <p>Risk and Uncertainty: Low</p>	<b>Low</b>
	<ul style="list-style-type: none"> <li>• Changes to human wellbeing</li> </ul>	<p>The existing mitigation measures identified by the Community Wellbeing subcomponent are expected to assist in the protection of human wellbeing through the Employee Leave policies, the IBCA, Diversity and Inclusion Programs, and Independent Workforce Counselling.</p>	<p>Context: Healthy to Compromised</p> <p>Magnitude: Moderate</p> <p>Extent/Scale: Local</p> <p>Duration: Medium-term</p> <p>Reversibility: Partially reversible</p> <p>Frequency: Continuous</p> <p>Affected Populations: Disproportionate</p> <p>Confidence in information and contingencies: Moderate</p> <p>Risk and Uncertainty: Moderate</p>	<b>Moderate</b>
<b>Employment and Economy</b>	Changes to employment	<p>Workforce Transition Plan</p> <p>End Land Use and Social Closure Plan</p> <p>See Table 11.11-34: Summary of Potential Residual Effects on Employment and Economy – Employment and Economy Subcomponent in the Proponent's Section 11.11 for existing mitigation measures.</p> <p>Workforce Transition Plan</p> <p>IBCA with TCG with preferred hiring, royalties, training, contracting and capacity development commitments</p> <p>Existing employee support programs</p>	<p>Context: Healthy to Compromised</p> <p>Magnitude: Low</p> <p>Extent/Scale: Regional</p> <p>Duration: Short-term</p> <p>Reversibility: Partially reversible</p> <p>Frequency: Continuous</p> <p>Affected Populations: Disproportionate</p> <p>Confidence in information and contingencies: High</p> <p>Risk and Uncertainty: Moderate</p>	<b>Low to Moderate</b>
	Changes to labour income	<p>See Table 11.11-34: Summary of Potential Residual Effects on Employment and Economy – Employment and Economy Subcomponent in the Proponent's Section 11.11 for existing mitigation measures.</p>	<p>Context: Healthy to Compromised</p> <p>Magnitude: Low</p> <p>Extent/Scale: Regional</p> <p>Duration: Short-term</p> <p>Reversibility: Partially reversible</p> <p>Frequency: Continuous</p> <p>Affected Populations: Disproportionate</p>	<b>Low to Moderate</b>

Tahltan Value	Project Effect	Proposed Mitigation Measures	Tahltan Significance Factors / Characterizations	Overall Severity of Adverse Effect
			Confidence in information and contingencies: High Risk and Uncertainty: Moderate	
	Changes to regional economy	Ongoing Communication with LAA Partners and RAA Mining Industry and Economic Development Organizations  See Table 11.11-34: Summary of Potential Residual Effects on Employment and Economy – Employment and Economy Subcomponent in the Proponent's Section 11.11 for existing mitigation measures.	Context: Healthy to Compromised Magnitude: Low Extent/Scale: Regional Duration: Short-term Reversibility: Fully reversible Frequency: Continuous Affected Populations: Disproportionate Confidence in information and contingencies: High Risk and Uncertainty: Moderate	<b>Low to Moderate</b>
<b>Infrastructure and Services</b>	Increase in traffic	Offsite Ground Transportation Management Plan, IBCA, Feedback and Grievance Mechanism- See Section 11.12.9.2 – Potential Effect 3 Increased Traffic along Public Roads – Infrastructure and Services Subcomponent in the Proponents Section 11.12.9 for effects management.	Context: Healthy to Compromised Magnitude: Moderate Extent/Scale: Regional Duration: Medium-term Reversibility: Fully reversible Frequency: Continuous Affected Populations: Even Confidence in information and contingencies: Medium Risk and Uncertainty: Moderate	<b>Moderate</b>
	Increased pressure on health services	Camp accommodation On-site health services.  Drug and Alcohol Policy and Substance Misuse Prevention Programs, Communicable Disease Management Plan, HMSP, EAP - See Section 11.12.9.1 – Potential Effect 2 Changes to Demand on Local Supporting Infrastructure and Community Services – Infrastructure and Services Subcomponent in the Proponents Section 11.12.9 for effects management.	Context: Compromised Magnitude: Low Extent/Scale: Regional Duration: Medium-term Reversibility: Reversible Frequency: Continuous Affected Populations: Disproportionate Confidence in information and contingencies: Low-moderate Risk and Uncertainty: Moderate	<b>Low-Moderate</b>
<b>Use of the Land and Resources for the Exercise of Tahltan Rights and Title</b>	Changes to the ability to exercise Tahltan governance and Tahltan's ability to use, respect, and care for the land and resources	See Section 11.9.9.1: Existing Mitigation Measures – Vegetation and Ecosystem Services Subcomponent in the Proponent's Section 11.09 for existing mitigation measures.	Context: Impacted Magnitude: High Extent/Scale: Site-specific Duration: Long-term Reversibility: Irreversible Frequency: Continuous Affected Populations: Disproportionate Confidence in information and contingencies: High Risk and Uncertainty: High	<b>High</b>
	Changes to the exercise of Tahltan governance and to Tahltan's ability to use, respect and care for the land and resources	See Section 11.10.9: Effects Management – Wildlife and Wildlife Habitat Subcomponent in the Proponent's Section 11.10 for existing mitigation measures.	Context: Compromised Magnitude: Low to Moderate Extent/Scale: Regional Duration: Long-term Reversibility: Irreversible	<b>Moderate</b>

Tahltan Value	Project Effect	Proposed Mitigation Measures	Tahltan Significance Factors / Characterizations	Overall Severity of Adverse Effect
		<p>See Section 11.9.9.1: Existing Mitigation Measures – Vegetation and Ecosystem Services Subcomponent in the Proponent’s Section 11.09 for existing mitigation measures.</p> <p>See Section 11.13.2.9: Existing Mitigation – Human Health Subcomponent in the Proponent’s Section 11.13 for existing mitigation measures.</p>	<p>Frequency: Continuous  Affected Populations: Even  Confidence in information and contingencies: Low  Risk and Uncertainty: Moderate</p>	
<b>Social and Cultural Relationship to the Land and Each Other</b>	Disruption to real and perceived community safety due to increased traffic and workforce	<p>Offsite Transportation Management Plan</p> <p>Site Safety Initiatives for the Safety of Women</p> <p>See Section 11.10.9: Effects Management – Wildlife and Wildlife Habitat Subcomponent in the Proponent’s Section 11.10 for existing mitigation measures.</p>	<p>Context: Impacted  Magnitude: Moderate to High  Extent/Scale: Regional  Duration: Long-term  Reversibility: Partially reversible  Frequency: Continuous  Affected Populations: Disproportionate  Confidence in information and contingencies: Low  Risk and Uncertainty: Moderate</p>	<b>Moderate</b>
<b>Peaceful Enjoyment of the Land</b>	Changes to sensory and spiritual experience of lands and waters	<p>Grievance Reporting and Adaptive Management</p> <p>Offsite Transportation Management Plan</p> <p>Tailings Impoundment Area (TIA) Seepage Interception (current and planned expansions)</p> <p>See Table 11.6-16: Summary of Potential Residual Effects on Groundwater – Groundwater Subcomponent in the Proponent’s Section 11.06 for existing mitigation measures.</p> <p>See Table 11.5-26: Summary of Potential Residual Effects on Surface Water – Surface Water Subcomponent in the Proponent’s Section 11.05 for existing mitigation measures.</p> <p>See Table 11.7-19: Summary of Potential Residual Effects on Fisheries and Aquatic Resources – Fisheries and Aquatic Resources Subcomponent in the Proponent’s Section 11.07 for existing mitigation measures.</p> <p>See Section 11.10.9: Effects Management – Wildlife and Wildlife Habitat Subcomponent in the Proponent’s Section 11.10 for existing mitigation measures.</p>	<p>Context: Compromised  Magnitude: Moderate  Extent/Scale: Local  Duration: Long-term  Reversibility: Irreversible  Frequency: Continuous  Affected Populations: Disproportionate  Confidence in information and contingencies: Low  Risk and Uncertainty: High</p>	<b>Moderate to High</b>

9.3.1.4 Highways AOI

Table 22: Severity of Effects on Tahltan Values in the Highways AOI

Tahltan Value	Project Effect	Proposed Mitigation Measures	Tahltan Significance Factors / Characterizations	Overall Severity of Adverse Effect
<b>Fish, Fish Habitat, and Aquatic Resources</b>	Changes to fish health and/or productivity	See Table 11.7-19: Summary of Potential Residual Effects on Fisheries and Aquatic Resources– Fisheries and Aquatic Resources Subcomponent in the Proponent’s Section 11.07 for existing mitigation measures.	Context: Healthy Magnitude: Low to Moderate Extent/Scale: Local Duration: Long-term Reversibility: Partially reversible Frequency: Continuous Affected Populations: Disproportionate Confidence in information and contingencies: High Risk and Uncertainty: Low	<b>Low</b>
	Changes of Fish Habitat Suitability and Availability	See Table 11.7-19: Summary of Potential Residual Effects on Fisheries and Aquatic Resources– Fisheries and Aquatic Resources Subcomponent in the Proponent’s Section 11.07 for existing mitigation measures.	Context: Healthy Magnitude: Low Extent/Scale: Local Duration: Medium-term Reversibility: Partially reversible Frequency: Continuous Affected Populations: Disproportionate Confidence in information and contingencies: High Risk and Uncertainty: Low	<b>Low</b>
<b>Wildlife and Wildlife Habitat</b>	Increase in wildlife interactions or mortality due to increased traffic	Offsite Transportation Management Plan  See Section 11.10.9: Effects Management– Wildlife and Wildlife Habitat Subcomponent in the Proponent’s Section 11.10 for existing mitigation measures.	Context: Healthy Magnitude: Moderate Extent/Scale: Regional Duration: Medium-term Reversibility: Reversible Frequency: Continuous Affected Populations: Disproportionate Confidence in information and contingencies: Low Risk and Uncertainty: Moderate	<b>Low to Moderate</b>
<b>Infrastructure and Services</b>	Increase in traffic	Offsite Ground Transportation Management Plan, IBCA, Feedback and Grievance Mechanism- See Section 11.12.9.2 – Potential Effect 3 Increased Traffic along Public Roads – Infrastructure and Services Subcomponent in the Proponents Section 11.12.9 for effects management.	Context: Compromised Magnitude: Moderate Extent/Scale: Regional Duration: Medium-term Reversibility: Reversible Frequency: Continuous Affected Populations: Disproportionate Confidence in information and contingencies: Low-moderate Risk and Uncertainty: Moderate	<b>Moderate</b>
<b>Social and Cultural Relationship to the Land</b>	Disruption to use or avoidance of the mine site and surrounding area due to access	See Section 11.15.9: Effects Management – Culture Subcomponent in the Proponents Section 11.15.9.1.1 and Section 11.15.9.1.2 for existing mitigation measures.	Context: Impacted Magnitude: Low to Moderate Extent/Scale: Local	<b>Low</b>

Tahltan Value	Project Effect	Proposed Mitigation Measures	Tahltan Significance Factors / Characterizations	Overall Severity of Adverse Effect
<b>and Each Other</b>	restrictions and real and perceived risks		Duration: Long-term Reversibility: Reversible Frequency: Continuous Affected Populations: Disproportionate Confidence in information and contingencies: Moderate Risk and Uncertainty: High	
	Disruption to real and perceived community safety due to increased traffic and workforce	Offsite Transportation Management Plan  Site Safety Initiatives for the Safety of Women  See Section 11.10.9: Effects Management – Wildlife and Wildlife Habitat Subcomponent in the Proponent's Section 11.10 for existing mitigation measures.	Context: Impacted Magnitude: High Extent/Scale: Regional Duration: Long-term Reversibility: Partially reversible Frequency: Continuous Affected Populations: Disproportionate Confidence in information and contingencies: Low Risk and Uncertainty: Moderate	<b>High</b>
<b>Peaceful Enjoyment of the Land</b>	Changes to sensory and spiritual experience of lands and waters	Grievance Reporting and Adaptive Management  Tailings Impoundment Area (TIA) Seepage Interception (current and planned expansions) See Table 11.6-16: Summary of Potential Residual Effects on Groundwater – Groundwater Subcomponent in the Proponent's Section 11.06 for existing mitigation measures.  See Table 11.5-26: Summary of Potential Residual Effects on Surface Water – Surface Water Subcomponent in the Proponent's Section 11.05 for existing mitigation measures.  See Table 11.7-19: Summary of Potential Residual Effects on Fisheries and Aquatic Resources – Fisheries and Aquatic Resources Subcomponent in the Proponent's Section 11.07 for existing mitigation measures.  Offsite Transportation Management Plan  See Section 11.10.9: Effects Management – Wildlife and Wildlife Habitat Subcomponent in the Proponent's Section 11.10 for existing mitigation measures.	Context: Compromised Magnitude: Moderate Extent/Scale: Local Duration: Long-term Reversibility: Irreversible Frequency: Continuous Affected Populations: Disproportionate Confidence in information and contingencies: Low Risk and Uncertainty: High	<b>Moderate to High</b>

9.3.1.5 Klappan River AOI

Table 23: Severity of Effects on Tahltan Values in the Klappan River AOI

Tahltan Value	Project Effect	Proposed Mitigation Measures	Tahltan Significance Factors / Characterizations	Overall Severity of Adverse Effect
<b>Groundwater</b>	Changes in Groundwater Quantity including Flow and Water Table	Groundwater monitoring to observe changes resulting from Project activities and continued adaptive management of site wide water and seepage management systems. Closure and post-closure stage water management systems, including active treatment.	Context: Healthy Magnitude: Low to Moderate Extent/Scale: Local Duration: Medium-term Reversibility: Fully reversible Frequency: Continuous to Periodic Affected Populations: Disproportionate Confidence in information and contingencies: High Risk and Uncertainty: Low	<b>Low</b>
	Interactions with Surface Water	Tailings Impoundment Area (TIA) and RSA Seepage Interception (current and planned expansions)	Context: Compromised Magnitude: Low Extent/Scale: Local Duration: Long-term Reversibility: Partially reversible Frequency: Continuous to Periodic Affected Populations: Disproportionate Confidence in information and contingencies: Moderate to High Risk and Uncertainty: Low to Moderate	<b>Low</b>
	Changes to Groundwater Quality	Tailings Impoundment Area (TIA) and RSA Seepage Interception (current and planned expansions)  See Table 11.6-16: Summary of Potential Residual Effects on Groundwater – Groundwater Subcomponent in the Proponent’s Section 11.06 for existing mitigation measures.	Context: Compromised Magnitude: Low Extent/Scale: Local Duration: Medium-term Reversibility: Partially reversible Frequency: Continuous to Periodic Affected Populations: Disproportionate Confidence in information and contingencies: Moderate to High Risk and Uncertainty: Low to Moderate	<b>Low</b>
<b>Surface Water</b>	Changes in Streamflow	See Table 11.5-29: Summary of Potential Residual Effects on Surface Water– Surface Water Subcomponent in the Proponent’s Section 11.05 for existing mitigation measures. Continued implementation of the existing Mine seepage interception and water management system and on-going improvement expansion information through adaptive management to minimize negative effects on surface water. Closure and post-closure stage water management systems, including active treatment.	Context: Healthy Magnitude: Low Extent/Scale: Regional Duration: Long-term Reversibility: Partially reversible Frequency: Continuous Affected Populations: Disproportionate Confidence in information and contingencies: Low to Moderate Risk and Uncertainty: Low	<b>Low</b>
	Changes in Surface Water Quality (Changes to Concentrations of Parameters of Concern in Natural Waterbodies)	See Table 11.5-29: Summary of Potential Residual Effects on Surface Water– Surface Water Subcomponent in the Proponent’s Section 11.05 for existing mitigation measures.	Context: Healthy Magnitude: Low Extent/Scale: Regional Duration: Medium- to Long-term	<b>Low to Moderate</b>

Tahltan Value	Project Effect	Proposed Mitigation Measures	Tahltan Significance Factors / Characterizations	Overall Severity of Adverse Effect
			Reversibility: Partially reversible Frequency: Continuous Affected Populations: Disproportionate Confidence in information and contingencies: Low to Moderate Risk and Uncertainty: Low to Moderate	
<b>Fish, Fish Habitat, and Aquatic Resources</b>	Changes to fish health and/or productivity	See Table 11.7-19: Summary of Potential Residual Effects on Fisheries and Aquatic Resources – Fisheries and Aquatic Resources Subcomponent in the Proponent's Section 11.07 for existing mitigation measures.	Context: Healthy Magnitude: Low to Moderate Extent/Scale: Local Duration: Long-term Reversibility: Partially reversible Frequency: Continuous Affected Populations: Disproportionate Confidence in information and contingencies: Low to Moderate Risk and Uncertainty: Low	<b>Low to Moderate</b>
	Changes of Fish Habitat Suitability and Availability	See Table 11.7-19: Summary of Potential Residual Effects on Fisheries and Aquatic Resources – Fisheries and Aquatic Resources Subcomponent in the Proponent's Section 11.07 for existing mitigation measures.	Context: Healthy Magnitude: Low Extent/Scale: Local Duration: Medium-term Reversibility: Partially reversible Frequency: Continuous Affected Populations: Disproportionate Confidence in information and contingencies: Moderate Risk and Uncertainty: Low	<b>Low to Moderate</b>
<b>Use of the Land and Resources for the Exercise of Tahltan Rights and Title</b>	Changes to the ability to exercise Tahltan governance and Tahltan's ability to use, respect, and care for the land and resources	See Section 11.10.9: Effects Management – Wildlife and Wildlife Habitat Subcomponent in the Proponent's Section 11.10 for existing mitigation measures.  See Section 11.9.9.1: Existing Mitigation Measures – Vegetation and Ecosystem Services Subcomponent in the Proponent's Section 11.09 for existing mitigation measures.	Context: Healthy to Compromised Magnitude: Low to Moderate Extent/Scale: Regional Duration: Long-term Reversibility: Irreversible Frequency: Continuous Affected Populations: Even Confidence in information and contingencies: Low to Moderate Risk and Uncertainty: Moderate	<b>Low to Moderate</b>
<b>Peaceful Enjoyment of the Land</b>	Changes to sensory and spiritual experience of lands and waters	Offsite Transportation Management Plan Tailings Impoundment Area (TIA) Seepage Interception (current and planned expansions)  See Table 11.6-16: Summary of Potential Residual Effects on Groundwater – Groundwater Subcomponent in the Proponent's Section 11.06 for existing mitigation measures.  See Table 11.5-26: Summary of Potential Residual Effects on Surface Water – Surface Water Subcomponent in the Proponent's Section 11.05 for existing mitigation measures.  See Table 11.7-19: Summary of Potential Residual Effects on Fisheries and Aquatic Resources – Fisheries and Aquatic Resources Subcomponent in the Proponent's Section 11.07 for existing mitigation measures.  See Section 11.10.9: Effects Management – Wildlife and Wildlife Habitat Subcomponent in the Proponent's Section 11.10 for existing mitigation measures.	Context: Healthy to Compromised Magnitude: Moderate Extent/Scale: Local Duration: Long-term Reversibility: Irreversible Frequency: Continuous Affected Populations: Disproportionate Confidence in information and contingencies: Low Risk and Uncertainty: High	<b>Low to Moderate</b>

9.3.1.6 Tahltan Saddle and Klappan Range AOI

Table 24: Severity of Effects on Tahltan Values in the Saddle and Klappan Range AOI

Tahltan Value	Project Effect	Proposed Mitigation Measures	Characterizations	Overall Severity of Adverse Effect
Groundwater	Changes in Groundwater Quantity including Flow and Water Table	Groundwater monitoring to observe changes resulting from Project activities and continued adaptive management of site wide water and seepage management systems. Closure and post-closure stage water management systems, including active treatment.	Context: Healthy Magnitude: Low Extent/Scale: Site-specific Duration: Short-term Reversibility: Fully reversible Frequency: Continuous Affected Populations: Disproportionate Confidence in information and contingencies: High Risk and Uncertainty: Low	Low
	Interactions with Surface Water	Tailings Impoundment Area (TIA) and RSA Seepage Interception (current and planned expansions)	Context: Healthy to Compromised Magnitude: Low Extent/Scale: Local Duration: Long-term Reversibility: Partially reversible Frequency: Continuous Affected Populations: Disproportionate Confidence in information and contingencies: Moderate to High Risk and Uncertainty: Low to Moderate	Low
	Changes to Groundwater Quality	Tailings Impoundment Area (TIA) and RSA Seepage Interception (current and planned expansions)  See Table 11.6-16: Summary of Potential Residual Effects on Groundwater – Groundwater Subcomponent in the Proponent’s Section 11.06 for existing mitigation measures.	Context: Healthy to Compromised Magnitude: Low Extent/Scale: Local Duration: Long-term Reversibility: Partially reversible Frequency: Continuous Affected Populations: Disproportionate Confidence in information and contingencies: Moderate to High Risk and Uncertainty: Low to Moderate	Low
Surface Water	Changes in Streamflow	See Table 11.5-26: Summary of Potential Residual Effects on Surface Water – Surface Water Subcomponent in the Proponent’s Section 11.05 for existing mitigation measures. Continued implementation of the existing Mine seepage interception and water management system and on-going improvement expansion information through adaptive management to minimize negative effects on surface water. Closure and post-closure stage water management systems, including active treatment.	Context: Healthy Magnitude: Low Extent/Scale: Local Duration: Long-term Reversibility: Partially reversible Frequency: Continuous Affected Populations: Disproportionate Confidence in information and contingencies: Low to Moderate Risk and Uncertainty: Low	Low

Tahltan Value	Project Effect	Proposed Mitigation Measures	Characterizations	Overall Severity of Adverse Effect
	Changes in Surface Water Quality (Changes to Concentrations of Parameters of Concern in Natural Waterbodies)	See Table 11.5-26: Summary of Potential Residual Effects on Surface Water – Surface Water Subcomponent in the Proponent's Section 11.05 for existing mitigation measures.	Context: Healthy Magnitude: Low Extent/Scale: Local Duration: Medium to Long-term Reversibility: Partially reversible Frequency: Continuous Affected Populations: Disproportionate Confidence in information and contingencies: Low to Moderate Risk and Uncertainty: Low	<b>Low to Moderate</b>
<b>Fish, Fish Habitat, and Aquatic Resources</b>	Changes to fish health and/or productivity	See Table 11.7-19: Summary of Potential Residual Effects on Fisheries and Aquatic Resources – Fisheries and Aquatic Resources Subcomponent in the Proponent's Section 11.07 for existing mitigation measures.	Context: Healthy Magnitude: Low to Moderate Extent/Scale: Local Duration: Long-term Reversibility: Partially reversible Frequency: Continuous Affected Populations: Disproportionate Confidence in information and contingencies: Low to Moderate Risk and Uncertainty: Low	<b>Low to Moderate</b>
	Changes of Fish Habitat Suitability and Availability	See Table 11.7-19: Summary of Potential Residual Effects on Fisheries and Aquatic Resources – Fisheries and Aquatic Resources Subcomponent in the Proponent's Section 11.07 for existing mitigation measures.	Context: Healthy Magnitude: Low Extent/Scale: Local Duration: Medium-term Reversibility: Partially reversible Frequency: Continuous Affected Populations: Disproportionate Confidence in information and contingencies: Moderate Risk and Uncertainty: Low	<b>Low to Moderate</b>
<b>Use of the Land and Resources for the Exercise of Tahltan Rights and Title</b>	Changes to the ability to exercise Tahltan governance and Tahltan's ability to use, respect, and care for the land and resources	See Section 11.10.9: Effects Management – Wildlife and Wildlife Habitat Subcomponent in the Proponent's Section 11.10 for existing mitigation measures.  See Section 11.9.9.1: Existing Mitigation Measures – Vegetation and Ecosystem Services Subcomponent in the Proponent's Section 11.09 for existing mitigation measures.	Context: Healthy to Compromised Magnitude: Low to Moderate Extent/Scale: Regional Duration: Long-term Reversibility: Irreversible Frequency: Continuous Affected Populations: Even Confidence in information and contingencies: Low to Moderate Risk and Uncertainty: Moderate	<b>Low to Moderate</b>
<b>Peaceful Enjoyment of the Land</b>	Changes to sensory and spiritual experience of lands and waters	Grievance Reporting and Adaptive Management Offsite Transportation Management Plan Tailings Impoundment Area (TIA) Seepage Interception (current and planned expansions)  See Table 11.6-16: Summary of Potential Residual Effects on Groundwater – Groundwater Subcomponent in the Proponent's Section 11.06 for existing mitigation measures.	Context: Healthy to Compromised Magnitude: Moderate Extent/Scale: Local Duration: Long-term Reversibility: Irreversible Frequency: Continuous Affected Populations: Disproportionate Confidence in information and contingencies: Low	<b>Low to Moderate</b>

Tahltan Value	Project Effect	Proposed Mitigation Measures	Characterizations	Overall Severity of Adverse Effect
		<p>See Table 11.5-26: Summary of Potential Residual Effects on Surface Water– Surface Water Subcomponent in the Proponent's Section 11.05 for existing mitigation measures.</p> <p>See Table 11.7-19: Summary of Potential Residual Effects on Fisheries and Aquatic Resources– Fisheries and Aquatic Resources Subcomponent in the Proponent's Section 11.07 for existing mitigation measures.</p> <p>See Section 11.10.9: Effects Management– Wildlife and Wildlife Habitat Subcomponent in the Proponent's Section 11.10 for existing mitigation measures.</p>	Risk and Uncertainty: High	

9.3.1.7 Red Chris Mine AOI

Table 25: Severity of Effects on Tahltan Values in the Red Chris Mine AOI

Tahltan Value	Project Effect	Proposed Mitigation Measures	Tahltan Significance Factors / Characterizations	Overall Severity of Adverse Effect
Groundwater	Changes in Groundwater Quantity including Flow and Water Table	Groundwater monitoring to observe changes resulting from Project activities and continued adaptive management of site wide water and seepage management systems. Closure and post-closure stage water management systems, including active treatment.	Context: Compromised Magnitude: Moderate Extent/Scale: Local Duration: Long-term Reversibility: Partially reversible Frequency: Continuous Affected Populations: Disproportionate Confidence in information and contingencies: Moderate Risk and Uncertainty: High	High
	Interactions with Surface Water	Tailings Impoundment Area (TIA) and RSA Seepage Interception (current and planned expansions)	Context: Impacted Magnitude: High Extent/Scale: Local Duration: Long-term Reversibility: Irreversible Frequency: Continuous Affected Populations: Disproportionate Confidence in information and contingencies: Moderate Risk and Uncertainty: High	High
	Changes to Groundwater Quality	Tailings Impoundment Area (TIA) and RSA Seepage Interception (current and planned expansions)  See Table 11.6-16: Summary of Potential Residual Effects on Groundwater – Groundwater Subcomponent in the Proponent’s Section 11.06 for existing mitigation measures.	Context: Impacted Magnitude: High Extent/Scale: Regional Duration: Long-term Reversibility: Irreversible Frequency: Continuous Affected Populations: Disproportionate Confidence in information and contingencies: Moderate Risk and Uncertainty: High	High
Surface Water	Changes in Streamflow	See Table 11.5-26: Summary of Potential Residual Effects on Surface Water– Surface Water Subcomponent in the Proponent’s Section 11.05 for existing mitigation measures. Continued implementation of the existing Mine seepage interception and water management system and on-going improvement expansion information through adaptive management to minimize negative effects on surface water. Closure and post-closure stage water management systems, including active treatment.	Context: Compromised Magnitude: Moderate Extent/Scale: Local Duration: Long-term Reversibility: Partially reversible Frequency: Continuous Affected Populations: Disproportionate Confidence in information and contingencies: Low to Moderate Risk and Uncertainty: High	Moderate
	Changes in Surface Water Quality (Changes	See Table 11.5-26: Summary of Potential Residual Effects on Surface Water– Surface Water Subcomponent in the Proponent’s Section 11.05 for existing mitigation measures.	Context: Impacted Magnitude: Low	High

Tahltan Value	Project Effect	Proposed Mitigation Measures	Tahltan Significance Factors / Characterizations	Overall Severity of Adverse Effect
	to Concentrations of Parameters of Concern in Natural Waterbodies)		Extent/Scale: Local Duration: Long-term Reversibility: Partially reversible Frequency: Continuous Affected Populations: Disproportionate Confidence in information and contingencies: Moderate Risk and Uncertainty: High	
<b>Fish, Fish Habitat, and Aquatic Resources</b>	Changes to fish health and/or productivity	See Table 11.7-19: Summary of Potential Residual Effects on Fisheries and Aquatic Resources– Fisheries and Aquatic Resources Subcomponent in the Proponent’s Section 11.07 for existing mitigation measures.	Context: Healthy to Compromised Magnitude: Low to Moderate Extent/Scale: Local Duration: Long-term Reversibility: Partially reversible Frequency: Continuous Affected Populations: Disproportionate Confidence in information and contingencies: Low to Moderate Risk and Uncertainty: Low to Moderate	<b>Moderate</b>
	Changes of Fish Habitat Suitability and Availability	See Table 11.7-19: Summary of Potential Residual Effects on Fisheries and Aquatic Resources– Fisheries and Aquatic Resources Subcomponent in the Proponent’s Section 11.07 for existing mitigation measures.	Context: Compromised Magnitude: Low Extent/Scale: Local Duration: Medium-term Reversibility: Partially reversible Frequency: Continuous Affected Populations: Disproportionate Confidence in information and contingencies: Moderate Risk and Uncertainty: Low to Moderate	<b>Moderate</b>
<b>Terrain and Soils</b>	Changes to Terrain Stability	Expansion of erosion, sediment, stability, and drainage controls within areas of additional or new disturbance.  See Table 11.8-10: Summary of Potential Residual Effects on Soil, Landscape, and Terrain – Soil, Landscape, and Terrain Subcomponent in the Proponent’s Section 11.08 for existing mitigation measures. Use of controlled caving techniques to manage the rate and direction of cave propagation and reduce cave-induced seismicity. Implementation of Safety Management Plan, including hazard assessment protocols and safety monitoring and warning systems.	Context: Compromised Magnitude: Moderate Extent/Scale: Local Duration: Long-term Reversibility: Irreversible Frequency: Periodic Affected Populations: Disproportionate Confidence in information and contingencies: Low Risk and Uncertainty: Moderate to High	<b>Moderate</b>
	Change in Landscape Features	See Table 11.8-10: Summary of Potential Residual Effects on Soil, Landscape, and Terrain – Soil, Landscape, and Terrain Subcomponent in the Proponent’s Section 11.08 for existing mitigation measures.	Context: Impacted Magnitude: High Extent/Scale: Local Duration: Long-term Reversibility: Irreversible Frequency: Once Affected Populations: Disproportionate	<b>High</b>

Tahltan Value	Project Effect	Proposed Mitigation Measures	Tahltan Significance Factors / Characterizations	Overall Severity of Adverse Effect
			Confidence in information and contingencies: Moderate Risk and Uncertainty: High	
<b>Wildlife and Wildlife Habitat</b>	Increase in wildlife interactions or mortality due to increased traffic	Offsite Transportation Management Plan  See Section 11.10.9: Effects Management – Wildlife and Wildlife Habitat Subcomponent in the Proponent's Section 11.10 for existing mitigation measures.	Context: Healthy to Compromised Magnitude: Low Extent/Scale: Regional Duration: Medium-term Reversibility: Reversible Frequency: Continuous Affected Populations: Disproportionate Confidence in information and contingencies: Low Risk and Uncertainty: Moderate	<b>Low</b>
	Changes in wildlife health or productivity	See Section 11.10.9: Effects Management – Wildlife and Wildlife Habitat Subcomponent in the Proponent's Section 11.10 for existing mitigation measures.	Context: Healthy to Compromised Magnitude: Moderate Extent/Scale: Regional Duration: Medium-long term Reversibility: Partially Reversible Frequency: Continuous Affected Populations: Disproportionate Confidence in information and contingencies: Low Risk and Uncertainty: High	<b>Moderate</b>
<b>Human Health</b>	Changes to the biophysical determinants of health due to: <ul style="list-style-type: none"> <li>• Changes to surface water quality;</li> <li>• Changes to fish health and/or fish productivity.</li> <li>• Changes to traditional food quality</li> <li>• Changes to Air Quality</li> </ul>	Aquatic Effects Monitoring Program Fugitive Dust and Air Quality Monitoring Program Water Treatment, Tailings and RSA Seepage Interception, Trigger Action Response Plan - See Table 11.5-29: Summary of Potential Residual Effects of the Project on Surface Water – Surface Water Subcomponent in the Proponent's Section 11.5.9 for existing and proposed new mitigation measures. Water Treatment, Tailings and RSA Seepage Interception - See Table 11.7-27: Summary of Potential Residual Effects on Fisheries and Aquatic Resources – Fisheries and Aquatic Resources Subcomponent in the Proponent's Section 11.7.12.5 for existing and proposed new mitigation measures.  The existing mitigation measures identified by the Fish and Wildlife Subcomponents are expected to assist in the protection of human health indirectly through protection of fish and wildlife health that may be consumed as traditional foods.	Context: Compromised Magnitude: Low to Moderate Extent/Scale: Local Duration: Long-term Reversibility: Partially reversible Frequency: Continuous Affected Populations: Disproportionate Confidence in information and contingencies: Moderate Risk and Uncertainty: Moderate	<b>Moderate</b>
	<ul style="list-style-type: none"> <li>• Changes to human wellbeing</li> </ul>	The existing mitigation measures identified by the Community Wellbeing subcomponent are expected to assist in the protection of human wellbeing through the Employee Leave policies, the IBCA, Diversity and Inclusion Programs, and Independent Workforce Counselling.	Context: Compromised to Impacted Magnitude: Low to Moderate Extent/Scale: Regional Duration: Medium-term Reversibility: Partially reversible Frequency: Continuous Affected Populations: Disproportionate Confidence in information and contingencies: Moderate Risk and Uncertainty: Moderate	<b>Moderate</b>

Tahltan Value	Project Effect	Proposed Mitigation Measures	Tahltan Significance Factors / Characterizations	Overall Severity of Adverse Effect
Use of the Land and Resources for the Exercise of Tahltan Rights and Title	Permanent alienation, including loss of access, in relation to portions of the subsidence zone and flooded pit lake	See Section 11.9.9.1: Existing Mitigation Measures – Vegetation and Ecosystem Services Subcomponent in the Proponent’s Section 11.09 for existing mitigation measures.	Context: Impacted Magnitude: High Extent/Scale: Site-specific Duration: Long-term Reversibility: Irreversible Frequency: Continuous Affected Populations: Disproportionate Confidence in information and contingencies: High Risk and Uncertainty: High	<b>High</b>
	Changes to the ability to exercise Tahltan governance and Tahltan’s ability to use, respect, and care for the land and resources	See Section 11.10.9: Effects Management – Wildlife and Wildlife Habitat Subcomponent in the Proponent’s Section 11.10 for existing mitigation measures.  See Section 11.9.9.1: Existing Mitigation Measures – Vegetation and Ecosystem Services Subcomponent in the Proponent’s Section 11.09 for existing mitigation measures.	Context: Impacted Magnitude: High Extent/Scale: Regional Duration: Long-term Reversibility: Irreversible Frequency: Continuous Affected Populations: Even Confidence in information and contingencies: High Risk and Uncertainty: Moderate	<b>High</b>
Social and Cultural Relationship to the Land and Each Other	Disruption to use or avoidance of the mine site and surrounding area due to access restrictions and real and perceived risks	See Section 11.15.9: Effects Management – Culture Subcomponent in the Proponents Section 11.15.9.1.1 and Section 11.15.9.1.2 for existing mitigation measures.	Context: Impacted Magnitude: Moderate Extent/Scale: Local Duration: Long-term Reversibility: Partially reversible Frequency: Continuous Affected Populations: Disproportionate Confidence in information and contingencies: Moderate Risk and Uncertainty: High	<b>Moderate - High</b>
	Disruption to real and perceived community safety due to increased traffic and workforce	Offsite Transportation Management Plan  Site Safety Initiatives for the Safety of Women  See Section 11.10.9: Effects Management – Wildlife and Wildlife Habitat Subcomponent in the Proponent’s Section 11.10 for existing mitigation measures.	Context: Impacted Magnitude: Low to Moderate Extent/Scale: Regional Duration: Long-term Reversibility: Partially reversible Frequency: Continuous Affected Populations: Disproportionate Confidence in information and contingencies: Low Risk and Uncertainty: Moderate	<b>Moderate</b>
Peaceful Enjoyment of the Land	Changes to sensory and spiritual experience of lands and waters	Grievance Reporting and Adaptive Management  Offsite Transportation Management Plan  Tailings Impoundment Area (TIA) Seepage Interception (current and planned expansions)	Context: Impacted Magnitude: High Extent/Scale: Local Duration: Long-term Reversibility: Irreversible Frequency: Continuous	<b>High</b>

Tahltan Value	Project Effect	Proposed Mitigation Measures	Tahltan Significance Factors / Characterizations	Overall Severity of Adverse Effect
		<p>See Table 11.6-16: Summary of Potential Residual Effects on Groundwater – Groundwater Subcomponent in the Proponent’s Section 11.06 for existing mitigation measures.</p> <p>See Table 11.5-26: Summary of Potential Residual Effects on Surface Water– Surface Water Subcomponent in the Proponent’s Section 11.05 for existing mitigation measures.</p> <p>See Table 11.7-19: Summary of Potential Residual Effects on Fisheries and Aquatic Resources– Fisheries and Aquatic Resources Subcomponent in the Proponent’s Section 11.07 for existing mitigation measures.</p> <p>See Section 11.10.9: Effects Management– Wildlife and Wildlife Habitat Subcomponent in the Proponent’s Section 11.10 for existing mitigation measures.</p>	<p>Affected Populations: Disproportionate</p> <p>Confidence in information and contingencies: High</p> <p>Risk and Uncertainty: High</p>	

### 9.3.2 Summary of Severity of Effects of the Block Cave Amendment

The following sections summarize the outcomes of the characterization of effects on both Tahltan Values (Table 26) and Tahltan Core Priorities per AOI (Table 27).

#### 9.3.2.1 Summary of Severity of Effects of the Block Cave Amendment on Tahltan Values

Table 26 summarizes the characterization ratings for each Tahltan Value across AOIs. The summary demonstrates that effects from the Block Cave Amendment are highest within the Red Chris Mine AOI, and generally diminish as the geographic scale increases. Exceptions to this pattern occur when considering effects on the Highways AOI, where safety to humans and to wildlife will be experienced on a larger scale due to increased traffic, and when considering socio-economic and cultural effects where effects of the Block Cave Amendment may be felt more acutely at the community scale rather than on the mine-site itself.

**Table 26: Summary of Severity of Effects per Tahltan Value**

Tahltan Value	Predicted Effect(s)	Summary of Severity of Effects per AOI
<b>Groundwater</b>	<ul style="list-style-type: none"> <li>Changes in Groundwater Quantity including Flow and Water Table;</li> <li>Interactions with Surface Water; and</li> <li>Changes to Groundwater Quality.</li> </ul>	<p>Highest AOI severity: <b>High</b> (from Red Chris Mine AOI)</p> <p>Most common Across AOIs: <b>Low to Moderate</b></p>
<b>Surface Water</b>	<ul style="list-style-type: none"> <li>Changes in Streamflow; and</li> <li>Changes in Surface Water Quality (Changes to Concentrations of Parameters of Concern in Natural Waterbodies).</li> </ul>	<p>Highest AOI severity: <b>High</b> (from Red Chris Mine AOI)</p> <p>Most common Across AOIs: <b>Moderate</b></p>
<b>Fish, Fish Habitat, and Aquatic Resources</b>	<ul style="list-style-type: none"> <li>Changes to Fish Health and/or Productivity; and</li> <li>Changes of Fish Habitat Suitability and Availability.</li> </ul>	<p>Highest AOI severity: <b>Low to Moderate</b> (all except Highways AOI)</p> <p>Most common Across AOIs: <b>Low to Moderate</b></p>
<b>Terrain and Soils</b>	<ul style="list-style-type: none"> <li>Changes to Terrain Stability; and</li> <li>Change in Landscape Features.</li> </ul>	<p>Highest AOI severity: <b>High</b> (from Red Chris Mine AOI)</p> <p>Most common Across AOIs: <b>Low to Moderate</b></p>
<b>Wildlife and Wildlife Habitat</b>	<ul style="list-style-type: none"> <li>Increase in Wildlife Interactions or Mortality due to Increased Traffic.</li> </ul>	<p>Highest AOI severity: <b>Low to Moderate</b> (from Highways and Red Chris Mine AOI)</p> <p>Most common Across AOIs: <b>Low to Moderate</b></p>

	<ul style="list-style-type: none"> <li>Potential impacts or cumulative impacts on wildlife and wildlife habitat from changes to water quality and declines in water quality and fish health/productivity</li> </ul>	
<b>Human Health</b>	<ul style="list-style-type: none"> <li>Changes to biophysical determinants of health</li> <li>Changes to human wellbeing</li> </ul>	Highest AOI severity: <b>Moderate</b> (from Red Chris Mine AOI) Most common Across AOIs: <b>Low</b>
<b>Employment and Economy</b>	<ul style="list-style-type: none"> <li>Changes to Employment;</li> <li>Changes to Labour Income; and</li> <li>Changes to Regional Economy.</li> </ul>	Highest AOI severity: <b>Low to Moderate</b> (from Communities AOI) Most common Across AOIs: <b>Low</b>
<b>Infrastructure and Services</b>	<ul style="list-style-type: none"> <li>Increase in traffic</li> <li>Increased pressure on health services</li> </ul>	Highest AOI severity: Moderate (from Highways and Regional AOIs) Most common Across AOIs: <b>Moderate</b>
<b>Use of the Land and Resources for the Exercise of Tahltan Rights and Title</b>	<ul style="list-style-type: none"> <li>Alienation, including loss of access, in relation to portions of the subsidence zone and flooded pit lake; and</li> <li>Changes to the exercise of Tahltan governance and to Tahltan's ability to use, respect and care for, the land and resources.</li> </ul>	Highest AOI severity: <b>High</b> (from Communities AOI and Red Chris Mine AOI) Most common Across AOIs: <b>Moderate</b>
<b>Social and Cultural Relationship to the Land and Each Other</b>	<ul style="list-style-type: none"> <li>Disruption to use or avoidance of the mine site and surrounding area due to access restrictions and real and perceived risks; and</li> <li>Disruption to real and perceived community safety due to increased traffic and workforce.</li> </ul>	Highest AOI severity: <b>High</b> (from Red Chris Mine AOI) Most common Across AOIs: <b>Moderate</b>
<b>Peaceful Enjoyment of the Land</b>	<ul style="list-style-type: none"> <li>Changes to sensory and spiritual experience of lands and waters.</li> </ul>	Highest AOI severity: <b>High</b> (from Red Chris Mine AOI) Most common Across AOIs: <b>Moderate</b>

### 9.3.2.2 Summary of Conditions of Tahltan Lands, Culture, and Communities Across AOIs

As discussed throughout this report, the potential adverse effects from the Block Cave Amendment are additive to the existing effects from the Red Chris Mine as permitted. In order to consider the potential effects holistically, in the context of change over time along the Tahltan Continuum, and in consideration of Tahltan Knowledge, Tahltan perspective and experience, and input and directions gathered from the Tahltan communities, Table 27 below summarizes the severity of potential effects from the Block Cave Amendment. The ratings from “Ancient” through to “Future without the proposed Block Cave Amendment” were determined in Step 1 of the methodology and pulled forward from Section 9.1.6.1. The AOI conditions for the “Future with the proposed Block Cave Amendment”, listed in the final column, were determined through an understanding of the severity of impacts as characterized in Section 9.3.2 (including consideration of Newmont’s committed mitigations), but in consideration of the key drivers of change for Tahltan Core Priorities. Where a rating (and colour) changes across the final two columns of Table 27, an effect of the Block Cave Amendment is driven by effects to one or more of the Tahltan Core Priorities within that AOI.

Key changes to the condition of Core Priorities expected from the Amendment are summarized below. These changes influence the conditions of the AOIs in the “Future with the proposed Block Cave Amendment in Table 27.

**Health of Lands and Waters:** Effects are focused mainly at the Red Chris Mine AOI and along Highway Corridors. Some positive environmental effects of the Amendment are recognized, but existing effects along with new effects of the Block Cave Amendment will continue to compromise the Health of Lands and Waters and drive change in condition at the Highways and Red Chris Mine AOI scales.

**Tahltan Way of Life:** The Block Cave Amendment will impact Tahltan Way of Life at the Red Chris Mine, Highways, Communities, and Consent AOI scales. Tahltan Way of Life is already impacted across all AOIs by multiple sources and across history. Benefits may temper some of the negative effects, especially in the Communities AOI, but Tahltan Way of Life will continue to be compromised across AOIs.

**Rights and Title:** The impacts of the Block Cave Amendment are mixed on Tahltan’s Rights and Title, with increased recognition of Tahltan governance and role in collaborative management, but also continued cumulative impacts to Rights and Title in the area, long term exclusion from important cultural lands and resources and inability to carry-out and pass on rights-based practices. At the Red Chris and Consent Area AOIs, the effects of the Amendment on Tahltan Rights and Title are one driver for a decrease in condition ratings with the Amendment.

**Ability to Reclaim and Restore:** Though the Block Cave Amendment does not drastically alter the existing reality of long-term impacts from the Red Chris Mine, it introduces changes to the Red Chris Mine infrastructure and perpetuates the generational impact of the mine on Tahltan communities. The continued operation of Red Chris Mine through the Block Cave Amendment will allow additional time to improve closure plans. However, the permanent effects of Red Chris in the Red Chris AOI and on communities, coupled with uncertainty regarding the potential for a sustainable closure plan drives some of the change of conditions at the Red Chris Mine AOI.

**Table 27: Summary of AOI Condition Considering Tahltan Core Priorities and Tahltan Stewardship Plan Management Directions (without conditions)**

<b>Summary of AOI Condition Considering Tahltan Core Priorities and Tahltan Stewardship Plan (TSP) Management Directions (without conditions)</b>
<p><b>Healthy</b></p> <p>Tahltan Core Priorities and TSP Management Directions are being met.</p>
<p><b>At Risk</b></p> <p>Tahltan Core Priorities and TSP Management Directions are being met but can be violated with additional resource development or direct effects are greater than estimated.</p>
<p><b>Stressed</b></p> <p>Tahltan Core Priorities and TSP Management Directions are being stressed but can be restored/maintained through mitigations, conditions, and increased application of TSP management directions for restoring/reclaiming the land.</p>
<p><b>Degraded</b></p> <p>Tahltan Core Priorities and TSP Management Directions are being degraded for one or more associated Tahltan Values but may be restored/maintained through mitigations, conditions, and increased application of TSP management directions for restoring/reclaiming the land</p>
<p><b>Impacted</b></p> <p>Tahltan Core Priorities and TSP Management Directions for one or more associated Tahltan Values are violated and the ability to restore the AOI is either 3 or more generations or irreversible.</p>
<p><b>Impacted +</b></p> <p>For the AOI, Tahltan Core Priorities will experience an additional impact from the proposed Amendment (used only if the characterization without the Amendment is “Impacted” and a substantive additional change is predicted).</p>

**Summary of AOI Condition Considering Tahltan Core Priorities and Tahltan Stewardship Plan (TSP) Management Directions (without conditions)**

AREA OF INTEREST	Ancient	Historic	Current	Future	Future <i>With the proposed Block Cave Amendment</i>
Regional CE AOI	Healthy	At Risk	Stressed (due to cumulative effects)	Stressed (due to cumulative effects)	Stressed  (no change due to scale of AOI and expected continued cumulative effects)
Consent AOI	Healthy	Healthy	Degraded (due to cumulative effects, effects on rights and title, impacts of Red Chris)	Degraded (due to cumulative effects, effects on rights and title, impacts of Red Chris)	Impacted  (due to mounting cumulative effects but recognizing increased Tahltan Decision making authority)
Communities AOI	Healthy	At Risk (Recognizing major changes in Tahltan way of life post contact)	Stressed (due to cumulative stressors on communities, including both positive and negative community impacts of Red Chris Mine development)	Degraded (due to cumulative stressors on communities, including both positive and negative community impacts of Red Chris Mine development)	Degraded  (No change due to benefits and effects expected to communities as a result of the proposed Amendment, considering conditions)
Highways AOI	Healthy	At Risk (due to development of highways)	Stressed (due to traffic and safety issues on highways)	Stressed (due to cumulative effects of multiple major projects using highway 37)	Degraded  (due to cumulative effects of multiple major projects using highway 37)

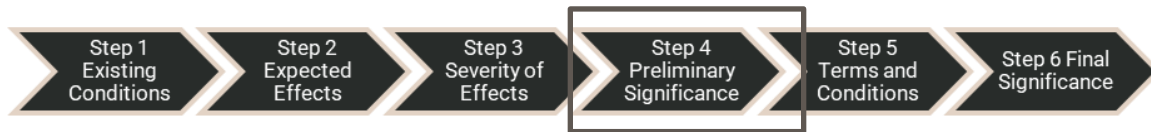
**Summary of AOI Condition Considering Tahltan Core Priorities and Tahltan Stewardship Plan (TSP) Management Directions (without conditions)**

Klappan River AOI	Healthy	At Risk	Stressed (due to the cumulative development interests, development of Red Chris, and importance of area to Tahltan)	Stressed (due to the cumulative development interests, development of Red Chris, and importance of area to Tahltan)	Stressed (no change – proximity of Red Chris to Klappan and uncertainty related to water management on site maintains rating)
Saddle and Klappan Range AOI	Healthy	At Risk	Stressed (due to resource development interest and importance of area to Tahltan)	Stressed (due to resource development interest and importance of area to Tahltan)	Stressed (no change—block cave effects not predicted to influence Saddle/Klappan range)
Red Chris Mine AOI	Healthy	At Risk	Impacted (Due to presence of Red Chris Mine)	Impacted (Due to presence of Red Chris Mine)	Impacted + (Due to prolonged impacts of Red Chris mine, but in recognition of conditions applied to address block cave effects)

#### 9.4 STEP 4: WHAT ARE THE OVERALL EFFECTS TO TAHLTAN LANDS, CULTURE AND COMMUNITIES?

Step 4 presents the significance of potential effects across all phases of the Block Cave Amendment on Tahltan by considering the Tahltan Risk Assessment Factors and Tahltan Sustainability Requirements, by taking into account the findings of the effects assessment carried out in Sections 9.1-9.3, Tahltan community directions and engagement, and considering inputs as listed in the Declaration Act Agreement (section 7.38), including but not limited to:

- (a) the information in the Amendment Application;
- (b) information from the Technical Advisory Committee;
- (c) the EAO's assessment of the Block Cave Amendment including the draft Assessment Report and any proposed terms and conditions to be included in the order that amends the EA Certificate (Amendment Order);
- (d) input from the public comment period; and,
- (e) the results of consensus-seeking efforts between TCG and the EAO on effects from the Block Cave Amendment.



##### 9.4.1 Tahltan Risk Assessment Factors

Table 28 summarizes how alignment of the Amendment with each Tahltan Risk Assessment Factor has been assessed and identifies key areas of concern where the Amendment does not align with Risk Assessment Factors. Key areas of non-alignment with Tahltan Risk Assessment Factors are described in detail in Section 9.4.1.1. Areas of non-alignment are flagged in Table 28 as having the potential for significant effects, either from the Amendment alone, or as additive to an existing effect. Again, where the potential for significant effects is identified, the topic is further explored in 9.4.1.1. Table 28 also identifies if a condition is being recommended in relation to the Tahltan Risk Assessment Factor and the potential for significant effects. Further detail on conditions is included in 9.4.1.1 and full text of conditions is in 9.5.

Responses to the Tahltan Risk Assessment Factors inform responses to the Tahltan Sustainability Criteria in Section 9.4.2.

Findings of potential significance, prior to applying conditions, for the proposed Block Cave Amendment were based on:

- A moderate or higher severity rating of an effect on a Tahltan Value (Section 9.3.1)
- An increase in severity of effect to a Tahltan Core Priority or AOI when comparing the future with the Block Cave Amendment to the future without the Block Cave Amendment (Section 9.3.3)
- If a Tahltan Risk Assessment Factor or Tahltan Sustainability Criteria is not met

Final conclusions on significance, considering the mitigating effects of the recommended conditions, are found in Section 9.6.

**Table 28: Evaluation of Tahltan Risk Assessment Factors**

Tahltan Risk Assessment Factor	Where is This Assessed?	Potential Significant Effect of the Amendment (prior to applying conditions)?	Existing Effect of Concern?	Recommended Condition? (See all conditions listed in 9.5)
<p>1. How will the project affect the following:</p> <p>a) Tahltan’s Title and Rights and the exercise of Title and Rights;</p> <p>b) high sensitivity areas or environmentally sensitive areas within Tahltan Territory;</p> <p>c) the quality or quantity of ground water or surface water, or ground and surface water connectivity with aquifers, lakes, rivers and streams;</p> <p>d) sacred areas;</p> <p>e) important habitat areas, including birthing, breeding and wintering areas for fish and wildlife, or wildlife migration corridors;</p> <p>f) ecosystems or species of importance to Tahltan;</p> <p>g) Tahltan harvesting areas, traditional use areas or other Tahltan land use areas;</p> <p>h) archaeological sites, burial sites, historical village sites or other site-specific features within Tahltan Territory;</p> <p>i) Tahltan management initiatives for lands, waters and resources within Tahltan Territory, including fish and wildlife; and</p> <p>j) infrastructure and community services within Tahltan Territory?</p>	<p>TRA: TRA was designed to consider all factors listed: “a” is considered through assessment of Tahltan Core Priorities; “b”, “c”, “e”, “f”, “j” were all considered through assessment on Tahltan Values; “d”, “g”, “h” were considered through the TLUOS which informed the Amendment Application and the TRA; “i” was considered through alignment with the Tahltan Stewardship Plan (TSP).</p> <p>Amendment Application: NRCML was required to consider all the factors listed within the values assessed, including environmental and biophysical values, as well as Archaeology, Culture, Human Health, and Infrastructure and Services.</p> <p>EAO Assessment Report: The EAO concluded on impacts to all values in the Amendment Application. With application of conditions, EAO found no significant residual adverse effects to all values assessed and state, <i>“With the implementation of proposed conditions, the effects to Tahltan rights would be adequately avoided, mitigated or otherwise accommodated within the scope of the environmental assessment, and that the provincial Crown has fulfilled its legal obligations to consult and accommodate Tahltan Nation related to the issuance of the Amendment”</i></p>	<p>Yes, to:</p> <p>a) Tahltan Rights and Title</p> <p>- (see narrative 9.4.1.1.1 below for further description.</p> <p>c) quality or quantity of groundwater or surface water</p> <p>- (see 9.4.1.1.2 for further discussion)</p> <p>j) infrastructure and community services within Tahltan Territory</p> <p>- (See 9.4.1.1.3 for further discussion)</p>	<p>Yes, development of the original Red Chris Mine led to impacts on all aspects listed in Tahltan Risk Assessment Factors 1, a – j. Where an effect of the Block Cave Amendment is expected to exacerbate effects of the existing mine, summaries following this table provide additional information.</p>	<p>Yes, see recommended EAC conditions:</p> <ul style="list-style-type: none"> <li>- Conditions 1-11</li> <li>- Conditions 15, 16, 17</li> <li>- Conditions 21, 24, 25, 26</li> </ul> <p>Bi-lateral commitments:</p> <ul style="list-style-type: none"> <li>- Reference Lake Report</li> <li>- New Environmental Effects</li> <li>- Adaptive Management and Sustainability Framework</li> </ul>
<p>2. What are the cumulative effects on the items listed in section 1 above?</p>	<p>TRA Sections 9.1.4 and 9.3.3 (Conditions of the AOIs Across the Tahltan Continuum with and without the Block Cave Amendment) explore cumulative effects across space and time for each AOI.</p> <p>TRA Sections 9.2.1.4 establishes the existing impacts of the permitted Red Chris Mine. These existing impacts are</p>	<p>Yes, see same summaries as referenced above that each speak to cumulative effects as well.</p> <p>See summaries: 9.4.1.1.1; 9.4.1.1.2; 9.4.1.1.3)</p>	<p>Yes, see same summaries as referenced above that each speak to cumulative effects as well.</p> <p>See summaries: 9.4.1.1.1; 9.4.1.1.2; 9.4.1.1.3)</p>	<p>Yes, see recommended EAC conditions 25 and 26.</p> <p>Bi-lateral commitments:</p> <ul style="list-style-type: none"> <li>- Adaptive Management and Sustainability Framework</li> </ul>

Tahltan Risk Assessment Factor	Where is This Assessed?	Potential Significant Effect of the Amendment (prior to applying conditions)?	Existing Effect of Concern?	Recommended Condition? (See all conditions listed in 9.5)
	<p>considered as “context” when characterizing effects on Tahltan Values in Section 9.3.1, and inform assessment of impacts on Tahltan Core Priorities (as above).</p> <p>Amendment Application: NRCML was required to consider cumulative effects on all potential residual adverse effects as identified per value in their application, and was required to consider effects cumulatively across time and space when assessing impacts per value, per AOI in Chapter 4.</p> <p>EAO Assessment Report: The EAO considered the cumulative effects of the proposed Block Cave Amendment in combination with other current or reasonably foreseeable future projects where a residual effect was predicted for a value.</p>			
<p>3. What is the proximity and associated effects of the project to Tahltan communities?</p>	<p>TRA: Effects to Tahltan Communities are considered in the Communities AOI and through assessment of values: Human Health; Infrastructure and Services; Employment and Economy; Use of the Land and Resources for the Exercise of Tahltan Rights; Social and Cultural Relationship to the Land and Each Other; Peaceful Enjoyment of the Land</p> <p>Amendment Application: NRCML considered effects on communities through assessment of values: Employment and Economy; Infrastructure and Services; Human Health, culture; Summary of Human and Health and Community Wellbeing, and assessment of Tahltan values listed above across Tahltan AOIs. Further information of community effects were considered in the HHRA and HIA.</p>	<p>Yes</p> <ul style="list-style-type: none"> <li>- See narrative 9.4.1.1.4</li> </ul>	<p>Yes</p> <p>See narrative 9.4.1.1.4</p>	<p>Yes, see recommended EAC conditions 23, 24, 26</p> <p>Bi-lateral commitments:</p> <ul style="list-style-type: none"> <li>- Socio-Cultural Health and Wellness Initiatives and Measures</li> <li>- Community, Culture, and Wellbeing Team</li> <li>- Community Wellbeing Fund</li> </ul>

Tahltan Risk Assessment Factor	Where is This Assessed?	Potential Significant Effect of the Amendment (prior to applying conditions)?	Existing Effect of Concern?	Recommended Condition? (See all conditions listed in 9.5)
	EAO Assessment Report considered impact to Tahltan communities through assessment of values: Employment and Economy; Human Health; Culture; Infrastructure and Services; Summary of Human Health and Community Wellbeing; Summary of Effects to Current and Future Generations.			
4. Will the project cause irreparable harm to Tahltan Territory?	<p>TRA: Impacts to Tahltan Values essential to Tahltan Territory were considered throughout all phases of the Block Cave Amendment (construction- post closure). The assessment of impact on Tahltan Core Priorities included assessment on the future (including 7 generations to the future).</p> <p>Amendment Application: NRCML assessed impacts on values through all phases of the Block Cave Amendment through to post-closure. In Chapter 4.2.1.2, NRCML provided TCG additional information specifically about their alternative closure study to support future improvements to their closure plans to address Tahltan interests.</p> <p>EAO Assessment Report: Considered impacts on values through all phases of the Block Cave Amendment through to Post Closure.</p>	No. Conversion to Block Cave does not substantially alter the long term effects on Tahltan Territory.	Yes. See 9.4.1.1.5 for further discussion of closure, reclamation, and permanent effects.	Yes, see recommended EAC conditions 11, 18, 19
5. What are the potential environmental, social, cultural, and economic impacts and benefits of the project on Tahltan and Tahltan communities (including in relation to health and vulnerability, risk and stress, cultural continuity, community wellbeing, social disruptions, employment, infrastructure capacity and services)?	<p>TRA: Assessed through 9.1-9.3 by assessing values that span Tahltan environmental, social, cultural, and economic interests. Section 9.2.1.2 lists specific adverse effects considered throughout the assessment; Section 9.2.1.3 lists potential positive effects.</p> <p>Amendment Application: NRCML assessed effects across on environmental, social, cultural, and economic values, including for Tahltan in</p>	Yes See summaries 9.4.1.1.1 - 9.4.1.1.8	Yes See summaries 9.4.1.1.1 - 9.4.1.1.8	Yes, the list of recommended EAC conditions and bi-lateral commitments were developed to address concerns resulting from the range of issues identified through the TRA, including those listed in this Tahltan Risk Assessment Factor. See all conditions, 1-27.

Tahltan Risk Assessment Factor	Where is This Assessed?	Potential Significant Effect of the Amendment (prior to applying conditions)?	Existing Effect of Concern?	Recommended Condition? (See all conditions listed in 9.5)
	<p>Chapter 4 across AOIs. Completion of the HHRA and HIA expanded understanding of effects on human health and wellbeing.</p> <p>EAO Assessment Report: assessed effects across on environmental, social, cultural, and economic values.</p>			
<p>6. Does the proposed project design, baseline information, mitigations, monitoring and closure protect the ground and surface water in the area, Tahltan areas of interest and in downstream land and water areas?</p>	<p>TRA: Assessed through 9.1-9.3 Ground and Surface Water values (quality and quantity) across AOIs and Tahltan Continuum. Considered in assessing impacts on "Health of Lands and Waters" AOI.</p> <p>Amendment Application: NRCML assessed effects to ground and surface water values, including for Tahltan in Chapter 4 across AOIs.</p> <p>EAO Assessment Report: Assessed effects to ground and surface water values.</p>	<p>Yes.</p> <p>See 9.4.1.1.2</p>	<p>Yes.</p> <p>See 9.4.1.1.2</p>	<p>Yes, see recommended EAC conditions 15, 16, and 17.</p> <p>Bi-lateral commitments:</p> <ul style="list-style-type: none"> <li>- Reference Lake Report</li> <li>- Geotechnical Review of Underground Works</li> <li>- Tailings Storage Facility</li> <li>- New Environmental Effects</li> <li>- Adaptive Management and Sustainability Framework</li> </ul>
<p>7. Has a Tahltan land use and occupancy study been completed and used in the design of the project and incorporated into the proponent's environmental assessment application?</p>	<p>A Traditional Land Use and Occupancy Study (TLUOS) was compiled in 2021 by Benjamin Jones and Duncan McLaren. This TLUOS was shared under confidentiality agreements with NRCML and select NRCML contractors and referenced throughout the Amendment Application, and relied upon to support the drafting of this TRA, particularly to support descriptions of ancient, historical, and current conditions for each AOI in Section 9.1.4.1 to 9.1.4.7.</p>	<p>No.</p> <p>Long term effects of land use and occupancy are addressed in summaries 9.4.1.1.1 and 9.4.1.1.5</p>	<p>No.</p> <p>Long term effects of land use and occupancy are addressed in summaries 9.4.1.1.1 and 9.4.1.1.5</p>	<p>No.</p> <p>Rights and Title and Closure Related conditions help address land use and occupancy concerns: Conditions 1-11, 18, 19.</p> <p>Bi-lateral commitments:</p> <ul style="list-style-type: none"> <li>- Tahltan Way of Life Plan</li> </ul>
<p>8. Does baseline information meet the confidences of Tahltan that it accurately and precisely captures the current knowledge for the project area, study areas and Tahltan areas of interest? If</p>	<p>The Tahltan review, supported by THREAT and including feedback from Tahltan community engagements, considered the adequacy of baseline information. Baselines used by NRCML were considered by Tahltan through reviews of</p>	<p>Yes</p> <p>See 9.4.1.1.6</p>	<p>Yes</p> <p>See 9.4.1.1.6</p>	<p>Yes, a number of recommended EAC conditions are designed to ensure monitoring occurs to address areas of low confidence. See recommended conditions 11, 14, 15, 16, 17, 20, 21, 22, 23, 24.</p>

Tahltan Risk Assessment Factor	Where is This Assessed?	Potential Significant Effect of the Amendment (prior to applying conditions)?	Existing Effect of Concern?	Recommended Condition? (See all conditions listed in 9.5)
not, do the contingencies meet the confidences of Tahltan?	the Amendment Application, including Chapter 4, and captured in the ITTs for Application Review and in THREAT comments on the EAO Assessment Report. Tahltan's confidence in baseline were captured in characterization (Tahltan Significance Factor) criteria applied in severity ratings in 9.3 of this report.			Bi-lateral commitments:  - New Environmental Effects  - Adaptive Management and Sustainability Framework
9. Do the proposed mitigation measures sufficiently address the potential negative impacts of the project on the environment, social, health, cultural, economic, community infrastructure and Tahltan's Rights and Title? Do the mitigations meet the confidence and expectations of Tahltan?	The Tahltan review, supported by THREAT and including feedback from community engagements, considered the adequacy of mitigations. Mitigations proposed by NRCML were questioned through reviews of the Amendment Application, including Chapter 4, and captured in the ITTs for Application Review and in THREAT comments on the EAO Assessment Report. Tahltan's confidence in mitigations were captured as part of the application of the Tahltan Significance Factors in 9.3 of this report.	Yes.  See summaries 9.4.1.1.1 - 9.4.1.1.8 that explain where existing and proposed mitigations are insufficient, contributing to significance before conditions are applied.	Yes.  See summaries 9.4.1.1.1 - 9.4.1.1.8 that explain where existing and proposed mitigations are insufficient, contributing to significance before conditions are applied.	Yes, see recommended EAC conditions 14-27 and bi-lateral commitments.
10. Have the concerns of Tahltan community members about the project impacts been adequately addressed?	Tahltan community input guided the methodology, the effects assessed, and influenced findings of this Tahltan Risk Assessment. See Sections 2.2.4 and 5 for details.	No, a significant effect related to Tahltan member feedback is not predicted. See Section 5 for a record of Tahltan engagement.	No, a significant effect related to Tahltan member feedback is not predicted. See Section 5 for a record of Tahltan engagement.	Yes, a number of recommended EAC conditions were designed, at least in part, to address Tahltan community concerns. See recommended conditions 11, 14, 15, 17, 18, 20, 21, 22, 23, 26.  Bi-lateral commitments:  - Socio-Cultural Health and Wellness Initiatives and Measures  - Community, Culture, and Wellbeing Team
11. Does the project align with Tahltan direction on the use of the project area, including in land use plans?	Assessed in 9.1.4.8 and 9.3.3 to consider alignment of the Block Cave Amendment with the Tahltan Stewardship Plan.	No.  Tahltan management direction for the Łuwechōn Deferral Area recognizes the presence of the Red	No.  Tahltan management direction for the Łuwechōn Deferral Area recognizes the presence of the	Yes, see recommended EAC condition 11.

Tahltan Risk Assessment Factor	Where is This Assessed?	Potential Significant Effect of the Amendment (prior to applying conditions)?	Existing Effect of Concern?	Recommended Condition? (See all conditions listed in 9.5)
		Chris Mine and management directions seek to limit mining near the community of Iskut. The TSP defers decision-making on future permissible land uses to future Tahltan generations.	Red Chris Mine and management directions seek to limit mining near the community of Iskut. The TSP defers decision-making on future permissible land uses to future Tahltan generations.	
12. Does the proposed project in the current design, as a stand alone project, and as part of a cumulative review, meet the Tahltan Sustainability Requirements?	Analysis of the Block Cave Amendment specifically against Tahltan Sustainability Requirements is set out in Section 9.4.2.	Yes. See Sustainability Requirement responses in Section 9.4.2.	Yes. See Sustainability Requirement responses in Section 9.4.2.	Yes, see recommended EAC condition 11. A number of recommended conditions 13-29 include requirements to improved alignment with Tahltan Sustainability Requirements.
13. What education, employment and training opportunities will the project provide?	TRA: Training and employment opportunities are described in Section 9.2.1.3 and 9.2.1.4.1.2.  Amendment Application: NRCML described training and employment associated with the conversion to Block Cave in Sections 11.11: and Chapter 4.2.1.3.5.  EAO Assessment Report: Assessed effects to Employment and Economy.	Yes See narrative 9.4.1.1.9	Yes.  Existing concerns related to employment at the Red Chris Mine and impact on community capacity, services, and cultural impacts, and lack of advancement opportunity for Tahltan employees.  See narrative 9.4.1.1.9	Yes, Bi-lateral commitments:  - Tahltan Worker Transition Plan  - Business Opportunities and Transition  - Business, Procurement and Contracting Team  - Education, Training and Employment Team
14. What economic opportunities will the project provide for Tahltan and Tahltan businesses?	TRA: Economic opportunities related to the Block Cave Amendment are described in Section 9.2.1.3  Amendment Application: NRCML describes economic opportunities associated with the conversion to Block Cave in Section 11.11 and Chapter 4.2.1.3.5.  EAO Assessment Report: Assessed effects to Employment and Economy.	No See narrative 9.4.1.1.9	No See narrative 9.4.1.1.9	Yes, Bi-lateral commitments:  - Tahltan Worker Transition Plan  - Business Opportunities and Transition  - Business, Procurement and Contracting Team  - Education, Training and Employment Team
15. Does the proponent have the financial resources to implement mitigations, including Tahltan mitigations and	Amendment Application: NRCML describes their financial position to	No	Yes—see closure narrative 9.4.1.1.5	Yes, see recommended EAC conditions 18, 19.

Tahltan Risk Assessment Factor	Where is This Assessed?	Potential Significant Effect of the Amendment (prior to applying conditions)?	Existing Effect of Concern?	Recommended Condition? (See all conditions listed in 9.5)
conditions, carry the proposed project to final closure, and contribute to, support, or assist in creating the legacies required by Tahltan as per the Tahltan Sustainability Requirements?	support the Block Cave Amendment through closure in Chapter 4.2.1.3.6.			
16. Can the land and water in the project area and Tahltan Areas of Interest be returned to the existing or desired health as directed by Tahltan laws, principles, policies and knowledge?	<p>TRA: Land and water values were assessed across the Tahltan Continuum for potential impacts. Assessment of the Block Cave Amendment on Tahltan Core Priority of "Ability to Reclaim and Restore" completed in Section 9.3.3.</p> <p>Amendment Application: NRCML assessed impacts on values through all phases of the Block Cave Amendment through to post-closure. In Chapter 4.2.1.2, NRCML provided TCG with additional information specifically about their alternative closure study to support future improvements to their closure plans to address Tahltan interests.</p> <p>EAO Assessment Report: Considered impacts on values through all phases of the project through to Post Closure.</p>	Yes, see 9.4.1.1.5	Yes, see 9.4.1.1.5	Yes, see recommended EAC conditions 11, 16, 17, 18, 19
17. How will the project affect Tahltan's relationship with the proponent?	<p>TRA: See Section 4.1.3.1 describing the Tahltan-NRCML relationship.</p> <p>Amendment Application: NRCML provided their perspective on the Tahltan-NRCML relationship in Chapter 4.2.1.3.7.</p>	Yes, see narrative 9.4.1.1.5. Non-approval of the proposed amendment would likely lead to near-term closure, changing Tahltan Relationship to NRCML.	Yes, see narrative 9.4.1.1.5. Non-approval of the proposed amendment would likely lead to near-term closure, changing Tahltan Relationship to NRCML.	Yes, see existing IBCA and bi-lateral commitments in 9.5.1.3.
18. What is the compliance, regulatory, and operational history of the project (if existing) and status of the working relationship of the proponent with Tahltan and other Indigenous nations?	<p>TRA: See Section 4.1.2 for an overview of compliance history for the Red Chris Mine. Compliance is also tracked reported annually through the Red Chris, "Roll-up Report" under the RCMA with BC.</p> <p>Amendment Application: NRCML provided an overview of the compliance history in Chapter 4.2.1.3.8.</p>	No.	No.	Yes, see recommended EAC conditions 8, 9, and definitions for "Collaborate", "Work With" and "Tahltan Satisfaction".
19. Is there independent Tahltan monitoring being funded as part of the project	TRA: See Section 4.1.3 for a description of Tahltan's role in monitoring of the Red	No.	No.	Yes, Bi-lateral commitments:

Tahltan Risk Assessment Factor	Where is This Assessed?	Potential Significant Effect of the Amendment (prior to applying conditions)?	Existing Effect of Concern?	Recommended Condition? (See all conditions listed in 9.5)
design for the lifetime of the project inclusive of closure and post-closure?	Chris Mine as a part of existing regulatory structures and commitments, and bi-lateral arrangements.  Amendment Application: Tahltan's role in monitoring is described in 4.2.1.3.1, 4.2.1.3.2 and 4.2.1.3.3.			- Tailings Storage Facility
20. Has the proponent appropriately addressed plans for monitoring and adaptive management to address any unforeseen environmental, social, health, or cultural impacts that may arise during the project's construction, operation, closure and post-closure phases?	TRA: NRCML's commitment to monitoring and adaptive management were considered when characterizing effects across Tahltan Values and AOIs in Section 9.3.1.  Amendment Application: NRCML described their existing and Block Cave Amendment-related commitments to monitoring and adaptive management in each value-based assessment.  EAO Assessment: The EAO considered NRCML's commitment to monitoring and adaptive management in their assessment of the significance of effects for each value.	No. Monitoring as proposed by NRCML for some programs is insufficient. See summaries 9.4.1.1.1 - 9.4.1.1.8 that explain where existing and proposed mitigations are insufficient, contributing to significance before conditions are applied.  Those conditions which require further monitoring reflect areas Tahltan believes current or promised monitoring will be insufficient.	No. Though NRCML conducts a number of monitoring programs, several gaps remain. See Conditions to address gaps.	Yes, see recommended EAC conditions that incorporate the need for monitoring and adaptive approaches should monitoring results differ from those predicted: 11, 14, 15, 16, 17, 20, 21, 23.  Bi-lateral commitments: <ul style="list-style-type: none"><li>- New Environmental Effects</li><li>- Adaptive Management and Sustainability Framework</li></ul>
21. Have the proponent and/or regulatory agencies applied the Tahltan Sustainability Requirements and the above risk criteria? Are they following the consent and decision-making requirements for Tahltan? Are they taking actions in relation to any Tahltan risk and sustainability concerns to require changes to the proposed project and project mitigation and conditions?	NRCML: NRCML has worked collaboratively with TCG and THREAT to assess impacts to Tahltan as required under the Declaration Act Agreement, Tahltan Risk Assessment Factors and Tahltan Sustainability Requirements, and as directed through Section 4 of the AAIR, authored by Tahltan. NRCML produced Chapter 4 of the Amendment Application to assess effects to Tahltan specifically, in addition to the remainder of the Amendment Application required by the EAO.  EAO and BC Regulatory Agencies: As directed by the Declaration Act Agreement, the EAO, (along with permitting agencies) have worked with Tahltan collaboratively to implement	No. No significant effect predicted here, though not all Sustainability Requirements can be met at this time. See narrative 9.4.1.1.5 and Section 10, conclusions of Risk Assessment, for more details.	No. No significant effect predicted here, though not all Sustainability Requirements can be met at this time. See narrative 9.4.1.1.5 and Section 10, conclusions of Risk Assessment, for more details.	Yes, see recommended EAC condition 11.

Tahltan Risk Assessment Factor	Where is This Assessed?	Potential Significant Effect of the Amendment (prior to applying conditions)?	Existing Effect of Concern?	Recommended Condition? (See all conditions listed in 9.5)
	commitments of the Declaration Act Agreement and come to consensus on final conclusions, terms and conditions for consideration in any final certificate.			
22. Has the proponent committed through binding obligations to meet the Tahltan Sustainability Requirements and Tahltan mitigations and conditions?	<p>TRA: Assessment in the TRA has led to recommendation for conditions listed in Section 9.5. If the Block Cave Amendment is granted, NRCML will be legally required to implement the conditions described in 9.5.</p> <p>Amendment Application: Chapter 4.2.1.3.9 describes NRCML's perspective on meeting Tahltan Sustainability Requirements.</p>	<p>Yes—though NRCML has committed to a number of measures to meet Tahltan Sustainability Requirements, NRCML has expressed they cannot commit to meet all requirements.</p> <p>Additional conditions are recommended to encourage NRCML to work towards meeting Tahltan Sustainability Requirements wherever possible.</p>	<p>Yes—though NRCML has committed to a number of measures to meet Tahltan Sustainability Requirements, NRCML has expressed they cannot commit to meet all requirements. Additional conditions are recommended.</p>	<p>Yes, see recommended EAC conditions 11, 18.</p>

#### 9.4.1.1 Summaries Supporting Risk Assessment Factor Analysis

##### 9.4.1.1.1 Impacts to Tahltan Rights and Title

We assessed impacts to Tahltan Rights and Title from the Block Cave Amendment through analysis of the condition of the Tahltan Core Priority of Rights and Title over the Tahltan Continuum, and with connection to the other Tahltan Core Priorities (e.g. way of life and health of lands and waters). We further assessed effects to Tahltan Values across AOIs to inform conclusions on impacts to Rights and Title.

Overall, we find:

- Tahltan Rights and Title are already impacted including high levels of existing cumulative impacts across the Tahltan Continuum to present day across AOIs due to multiple effects of colonization, resource extraction, and ongoing inability to fully exercise Tahltan Rights and Title, including the ability for Tahltan to fully exercise our Aboriginal title and to govern our own lands and resources.
- Tahltan Rights and Title were further impacted by the original approval of the Red Chris Mine, evidenced by the Crown's exertion of authority to issue the original approvals despite opposition from Tahltan and the removal of access for Tahltan people to the permitted mine area for the exercise of Rights and Title. Use of surrounding areas by Tahltan members for the exercise of Rights and Title is greatly reduced in large part due to the presence of the Red Chris Mine. Aboriginal title includes the right to use and benefit from the lands and resources and, by way of an example of how Tahltan's use and benefit in the area of the Red Chris Mine is being impacted nearby Tahltan outfitters report major impacts on their business due to the mine. Through the existing IBCA, Tahltan has been able to partially exercise our right to economically benefit from Tahltan's lands and resources that are being used in relation to the mine's operations. Impacts, including cumulative impacts, of the permitted Red Chris Mine on Tahltan's Rights and Title will continue regardless of the development scenario of the Red Chris Mine (open pit, early closure, or conversion to Block Cave). Early closure of the mine would more quickly return portions of the Permitted Mine area to Tahltan use and benefit.
- Conversion from open pit to Block Cave will increase impacts on Rights and Title at the Consent AOI scale due to permanent, regional impacts from continued alienation of the Red Chris Mine site; at the Highways AOI due to real and perceived traffic and safety risks; and at the Red Chris Mine AOI due to a small increase in permanently disturbed lands and creation of a permanent subsidence zone and pit lake and flooded underground infrastructure.
- Increased recognition of Tahltan authority for decision-making relating to the Red Chris Mine through the Declaration Act Agreement, including for other future substantial change to the Red Chris Mine, allow for increased exercise of Tahltan Rights and Title at the mine site.
- When considering cumulative impacts on Rights and Title at the scale of the Regional, Saddle and Klappan Range, Klappan River, or Consent AOIs, Tahltan Rights and Title have been continually infringed by land and resource authorizations and developments for more than a century. As with the Declaration Act Agreement and ongoing land use planning, recognition of Tahltan's authority over land and resource decisions is increasing but is limited and not complete. It will continue to require steadfast efforts by our people and Leaders, for increased recognition as the Territory faces unprecedented interest in critical-mineral related major project developments.
- Existing commitments for collaborative management of the site through the RCMA and the IBCA with NRCML will be in place for the life of the Red Chris Mine, unless otherwise agreed by Tahltan. See bi-lateral commitments in section 9.5.1.3 and additional commitments of the province in section 10.

Given the above, the analysis throughout this TRA, and considering that the Declaration Act Agreement for the Block Cave Amendment recognizes Tahltan Rights and Title and decision-making authority, we find that the potential impacts of the Block Cave Amendment specifically to Tahltan's Rights and Title are not significant. However, when assessed in the context of the existing cumulative impacts to Tahltan Rights and Title, including:

- from the existing effects on Tahltan Core Priorities;
- loss of access and establishment of past, current and future barriers to Tahltan from the Red Chris Mine and other resource development across the AOIs; and
- the changes to the ability to exercise Tahltan Aboriginal title and governance;

Tahltan's ability to use, respect and care for our land and resources remain impacted.

Overall, we find that the Block Cave Amendment, before applying conditions, will result in significant residual adverse cumulative impacts to Tahltan's Rights and Title.

### **Recommended Conditions for Rights and Title (See Section 9.5.2 for full text of conditions)**

- Conditions 1 – 11 were developed to ensure an avenue, post-Declaration Act Agreement, to strengthen Tahltan's role in reviewing and addressing any plans, documents, and measures to ensure Tahltan can express satisfaction or lack of satisfaction with the implementation of conditions as they are mandated for submission to the EAO. At this time, the EAO retains final decision-making authority on condition implementation; However, the TCG Lands Department has negotiated a strong role for oversight of conditions, allowing for a continued exercise of Tahltan's governance rights and protection of Rights and Title via the oversight of implementation of conditions. It is possible through future agreements on compliance and enforcement that Tahltan's role in overseeing condition implementation may be augmented.
- Conditions 12-27 address technical outcomes of the Tahltan Risk Assessment. These conditions include requirements for collaboration and for documents and implementation of programs to meet Tahltan Satisfaction. The conditions are designed to support environmental and community health during all construction, operations, closure and post-closure of the Block Cave Amendment to ensure Tahltan can continue, to the extent possible, to exercise our Rights and Title within the Red Chris Mine AOI and across the territory.
- Specific conditions of note relating to continued exertion of Tahltan Rights and Title in post-certificate governance of the Block Cave Amendment include:
  - 8. Tahltan Satisfaction
  - 9. "Work With" Condition
  - 10. Tahltan Sources and Types of Knowledge
  - 11. Tahltan Sustainability Reporting
  - Definitions for "Collaborate/Collaboration"; "Work With"; "Tahltan Satisfaction" and "Tahltan Aboriginal Rights"
- Additional commitments to be appended to the existing IBCA that support Tahltan Rights and Title include:
  - Tahltan Satisfaction
  - Tahltan Way of Life
  - Tahltan Food Sovereignty
  - Tailings Storage Facility
  - Archaeology and Heritage Commitments

### **After Applying Conditions for Rights and Title (See Section 9.6 for final conclusions)**

Once applying the conditions recommended above, we find that:

- The potential impacts of the Block Cave Amendment specifically to Tahltan's Rights and Title are not significant.
- Residual adverse cumulative effects to Tahltan's Rights and Title are significant.

#### **9.4.1.1.2 Quality and quantity of ground water or surface water, or groundwater and surface water connectivity with aquifers, wetlands, lakes, rivers and streams;**

We assessed impacts to the Tahltan Values of groundwater and surface water across Tahltan AOIs. We also, considered the impact to water in analysis of the Tahltan Core Priority of 'Health of Lands and Waters' primarily, along with the analysis of all Core Priorities. We also note that THREAT has regular and continuous involvement and insight into ground and surface water management at the Red Chris Mine through the existing collaborative management arrangements.

Overall, we find:

- The groundwater and surface water at the scale of the Red Chris Mine AOI is already impacted by mine seepage leading to water quality degradation. There are several plumes of impacted groundwater (the extent of which remain undetermined) and indications of gradually increasing concentrations in several surface water bodies.
- Seepage from the existing TIA and RSA continues with the potential for very long-term impacts due to the slow velocity and low amount of dilution of groundwater. The observed impacts are greater than the impacts that were predicted when the mine was originally approved. Though NRCML is working to address seepage through monitoring, interception systems, and process improvements, we have yet to witness improvements in groundwater quality on the mine site as a result of the interventions.
- The Block Cave Amendment does not change the size or permitted limits of the TIA.
- The Block Cave Amendment will reduce the ultimate size of the RSA compared to the full execution of the open pit mine as permitted, reducing one source of potential seepage and contributing to some expectations of water quality improvements in the Block Cave scenario as compared to continuing open pit mining.
- The Block Cave Amendment will see an increase in production during operations, though additional mitigating tools will also be in place. At minimum, a change in timing of seepage will occur, with uncertainty around estimates of groundwater and surface water quality into the future. As a result of the impacts to groundwater, current water quality models suggest there may be exceedances of provincial surface water quality guidelines in Trail Creek, Quarry Creek and Northeast Arm Creek, Red Rock Canyon Creek and potentially Coyote Creek in the future, but the magnitude, timing, and extent are uncertain.
- Ground and Surface Water concerns will remain through all phases of the Block Cave Amendment: construction, operations, closure and post-closure. To note, water quality issues exist for all potential mine development scenarios, including continuing open pit, closing the current mine, or converting to Block Cave. No matter the scenario, significant effort is required by NRCML to address current and future water quality impacts. See section 9.4.1.1.5 for further discussion of closure management.
- Uncertainty and risk drive heightened concerns around water quality impacts in the Red Chris Mine AOI. Specifically, uncertainty remains related to:
  - Seepage pathways and how seepage is travelling from the sources to the receiving environments, including through various groundwater aquifers, complicating interception planning.
- Potential hydraulic connectivity and seepage pathways between the proposed Block Cave infrastructure and Kluea/Todagin Lakes, especially in the upper 200m of fractured bedrock and at closure when the subsidence zone will be flooded.
  - Effectiveness of recently implemented seepage interception systems (e.g. North and South Valley shallow aquifer, RSA SW flowpath) and additional seepage mitigations measures under development (North and South Valley deep aquifer, RSA).
  - Effectiveness of the addition of a tailings thickener at the site and the assumed positive effect of it helping reduce lateral seepage through its role in allowing centralization of the tailings pond.
  - Full extent of seepage plumes and their rates of advancement.
  - Characteristics of the North East Arm aquifers and the potential seepage pathways in the Northeast Valley to the Klappan River.
  - Streamflow levels at closure and post-closure: models currently predict increases in streamflow for multiple creeks emanating from the mine site including Red Rock Canyon, Lost, Northeast Arm, and Trail Creeks when cave dewatering ends at closure. These high streamflows are not permanent but are predicted to be longer in duration than would occur during natural flood occurrences and could impact downstream habitat. NRCML expects refined modelling will show lesser magnitude streamflow changes, but model refinements will occur at a later date.
- When considering effects to water in relation to other major project development, the acute effects on water quality are predicted to remain limited to the Red Chris Mine AOI. Should contamination plumes reach major waterways such as the Klappan or Iskut rivers, effects on overall quality will be

negligible due to the volumes of water transmitted in these watersheds. No other major projects are currently predicted to share the same watersheds as the Red Chris Mine. However, the potential remains for the Red Chris Mine to further expand past the proposed Block Cave Amendment given that ore remains to be extracted from the current delineated ore bodies and exploration in the vicinity of the Red Chris Mine continues. Given that long term water quality concerns remain for the current Red Chris Mine, expansion will have to be considered carefully at the time of proposal. From a territorial perspective, though interaction of effects between the Red Chris Mine and other major project-affected water is limited, contamination of waters in Tahltan Territory is considered unacceptable. Both real and perceived impacts to water sources in Tahltan Territory can create anxiety, despair, distrust, and reduction in use of resources by Tahltan members, which in turn can have negative effects on Tahltan health, culture, social wellbeing and Tahltan way of life.

### **Regulatory Measures**

A number of current regulatory requirements and associated mitigations to address seepage would be required to be continued during the Block Cave Amendment.

- Recent amendments to the major permits for the Red Chris Mine have strengthened requirements for:
  - A conceptual and detailed design for the Rock Storage Area seepage interception system, and initiating construction of the system by January, 2027.
  - A Seepage Prevention Plan for the Northeast Arm, prior to inundation beyond 1144masl and full inundation of the Northeast Arm.
  - Requirements for monitoring of deep aquifer pumping in the north and south valleys to confirm and avoid pumping impacts on deep aquifer contamination.
- An increase in the closure bond to be held by the province to recognize the need for water treatment at closure and for the next 100 years. The bond was increased by \$112,285,000 to account for water treatment, (the bond will be further increased to account for Block Cave closure costs should the Block Cave Amendment be approved; See Section 9.4.1.1.5).

Given the above context and the findings of this assessment, and before applying conditions, we find that the Block Cave Amendment, specifically, is not predicted to have significant adverse effects on the Tahltan Values of water quality and quantity, substantially different from the impacts being witnessed and predicted from the current development scenario and mine closure. However, given the existing water quality concerns and uncertainty in effectiveness of current and future mitigation measures, existing effects on water quality persist and are of very high concern to Tahltan. Therefore, we find that the Block Cave Amendment will result in significant residual adverse cumulative effects on groundwater and surface water interconnected to Tahltan Core Priorities. Given the complexity of water management at the Red Chris Mine and Tahltan's stewardship responsibilities, water quality at the Red Chris Mine must be addressed, regardless of development scenario. As such, we recommend the below conditions be included in any Tahltan Notice of Decision providing consent to the Block Cave Amendment.

### **Recommended Conditions for Groundwater and Surface Water (See Section 9.5.2 for full text of conditions)**

We recommend the following conditions are appended to a Block Cave Amendment EAC to directly address water quality concerns:

- 15. Seepage Mitigation Report
- 16. Closure Streamflow Report
- 17. Kluea Lake Watershed Hydraulic Connectivity Monitoring Plan
- 22. Wildlife Management Plan Updates

We further recommend the following conditions, that include measures that also address water quality and quantity concerns:

- 18. Tahltan Future Generations Plan
- 19. Closure Study Report
- 20. Ground Stability Reports

- 23. Tahltan Human Health Monitoring and Management Plan
- 27. Community Environmental Reporting Plan

For specific and technical water-quality management measures, the major permits governing the Red Chris Mine, are better suited tools than the EAC to prescribe conditions. The major Environmental Management Act and Mine Act permits currently regulate water management on site. Should the Block Cave Amendment be approved by TCG and BC, major permits regulating the mine will be amended. Key measures currently included or expected in permits that address water quality include:

- Water Management Plans
- Surface and Groundwater monitoring networks and required reporting
- Trigger Action Response Plan and Seepage Effects Mitigation Plan to address concerning water quality trends in receiving environments
- Requirement for a Northeast Arm Prevention Plan
- Requirements for RSA Seepage Management System
- Requirements for TCG collaboration and satisfaction for key seepage-related deliverables
- Requirements for water treatment planning
- Stronger reclamation planning and assessments
- Requirements for key geotechnical management documents before block caving advances
- Increase in reclamation and closure bond (see 9.4.1.1.5)

Additional commitments to be appended to the existing IBCA that address water quality and quantity include:

- Geotechnical oversight: Ensuring underground development does not adversely affect water, including through block caving, subsidence, or effects on the Kluea Lake Landslide complex.
- Reference Lake Report
- Tailings Storage Facility

**After Applying Conditions for Groundwater and Surface Water** (See Section 9.6 for final conclusions)

Once applying the conditions recommended above, we find that:

- The potential impacts of the Block Cave Amendment specifically to Groundwater and Surface Water are not significant.
- Residual adverse cumulative impacts to Groundwater and Surface Water are not significant.

**9.4.1.1.3 Infrastructure and Community Services**

Impacts to community infrastructure and services were described in part through the Amendment Application and were further explored in the detailed Health Impact Assessment completed in parallel to the EA process. Assessments focused on issues such as housing and accommodation, community services and infrastructure, including access to healthcare services, and transportation infrastructure and traffic. Through the TRA, we considered effects to services and infrastructure through assessment of the Tahltan Value of Infrastructure and Services, but also through the values of Human Health including Human Wellbeing, Social Connection to the Land and Each Other, and through the Core Priority of Tahltan way of life.

Our assessment starts with the recognition that Tahltan communities already struggle with housing supply, limited community services including limited healthcare and pharmaceutical options, and challenging

transportation conditions. The existing Red Chris Mine contributes in part to these circumstances through several avenues, including: use of Highway 37 from Dease Lake to the mine site (for worker transportation) and from the mine site south on Highway 37 (for concentrate trucks and mine-support vehicles); employment and retention of skilled workers who no longer can contribute to community-based service provision and have limited ability to fulfill cultural roles; accessing local health services when mine-based services are insufficient for the need; and, potentially contributing to out-migration of the community due to provision of transportation for all mine employees.

We must also recognize that NRCML and the existing Red Chris Mine also positively contribute to the infrastructure and services in Tahltan Territory, including:

- Supporting the Dease Lake Regional Airport;
- Being a member of the Industry Working Group, supporting the recent announcements of investment in highways improvements;
- Providing emergency response capacity, particularly through their ability to contribute trained, mine-rescue personnel and helicopter medivac capacity to remote emergencies. The community cites this contribution as especially crucial and impactful;
- Providing financial contributions to community-led infrastructure development, such as 10-year anniversary, \$8 million contribution to Tahltan;
- Contributions to the Tahltan Heritage Trust and annual community investments;
- Providing transportation for medical professionals to Dease Lake and Iskut Health Centres;
- Supporting Tahltan business ventures, including the recent purchase of Stewart Bulk Terminals

For clarity, the contributions listed above are from the existing Red Chris Mine, and are not related to or contingent on the Block Cave Amendment proceeding.

Our review and assessment find that the key drivers for additional impacts to Community Infrastructure and Services due to the development of the Block Cave Amendment include:

- Increase in employment of approximately 300 workers during construction, and subsequent effects on labour and volunteer capacity in Tahltan communities which are relied on for a number of social and health services, as well as cultural wellbeing.
- Cumulative effects on the labour market, if project construction overlaps with other major project development in Tahltan Territory. Potential overlap with Eskay Creek development is likely. This overlap is important not only because of total job numbers, but because multiple projects may draw on the same finite Tahltan labour pool, including skilled workers, trainees, contractors, supervisors, and community leaders. In practice, this can intensify labour competition, reduce availability for family responsibilities, and place added pressure on local service capacity, governance participation, and cultural continuity in Tahltan communities. This all adds to the decline in Tahltan Core Priorities and Tahltan well being.
- Increase in traffic, particularly the increase in concentrate haul trucks on Highway 37 to the Port of Stewart. The Red Chris Mine already contributes measurable traffic to regional transportation systems used by Tahltan members. Current traffic from the Red Chris Mine includes approximately 42 return bus trips per month for worker transportation between Dease Lake and site, and approximately 6 to 10 return concentrate-haul truck trips per day on Highways 37 and 37A. The Red Chris Mine also currently transports a workforce of approximately 700–800 personnel on a two-week Fly-in, Fly-out rotation, with approximately 85% of workers flying in via Dease Lake before being transported to site by bus (NRCML 2024a).
- Forecasted increases in traffic are largely driven by increases in light vehicle traffic during construction, and increases in concentrate haul trucks during operations, with an estimated peak of 42 concentrate truck trips/per day travelling Highway 37 south of the mine site to the Port of Stewart (forecasted for year 6 from initiation of project construction) (NRCML 2024a).
- Traffic impacts on Highway 37 will combine with other existing and forecasted traffic. Red Chris traffic in total is expected to contribute 10% or less to total traffic volume on Highway 37 with development of the Block Cave Amendment. With expected development of the Eskay Creek Revitalization Project, Red Chris and Eskay traffic will combine with an expected 10 additional concentrate trucks per year from Eskay. The effect is therefore the additive burden of industrial traffic on regional corridors,

including safety risks, reduced travel comfort, barriers to access, wildlife collision risk, and heightened concern regarding winter travel and the safety of Tahltan members using these routes.

- NRCML references their commitment for a Ground Transportation Management Plan to address all effects associated with increasing traffic. However, uncertainty remains high as to the effectiveness of this mitigation without having seen the contents of the Plan. Tahltan members are clear in their concern for the safety of Tahltan members travelling these routes with increasing traffic particularly during winter driving conditions and particularly for women, girls, and other vulnerable Tahltan members.
- Through assessment of effects through all phases of the Block Cave Amendment, we must also consider the effects of the withdrawal of supports and services related to the existing Red Chris Mine, and reduction of employment at closure and post closure. The effects are different from those associated with Block Cave development, but nevertheless must be considered and planned for given the many interactions between NRCML and local and regional activities such as health care access and supports, contribution to employment in the region, and socio-economic contributions.

Given the above, and before applying conditions, we find that the Block Cave Amendment specifically, and only as it relates to predicted traffic effects, is predicted to have significant residual adverse effects. The Block Cave Amendment, when considered in addition to the existing mine and cumulatively with other current and predicted major projects in the region and when considering the current condition of infrastructure and services in Tahltan Territory, will contribute to significant residual adverse cumulative effects.

#### **Recommended Conditions for Infrastructure and Services (See Section 9.5.2 for full text of conditions)**

We recommend the following conditions are appended to a Block Cave Amendment EAC to directly address infrastructure and services concerns:

- 21. Offsite Ground Transportation Management Plan
- 24. Social and Healthcare Services Closure Report
- 25. Regional Cumulative Effects Initiatives
- 26. Tahltan Regional Initiatives

Additional commitments to be appended to the existing IBCA that support Infrastructure and Community Services include:

- Tahltan Emergency Response Plan
- Tahltan Socio-Cultural and Wellbeing Initiatives
- Tahltan Way of Life Plan.
- Tahltan Community Wellbeing Fund

#### **After Applying Conditions for Infrastructure and Community Services (See Section 9.6 for final conclusions)**

Once applying the conditions recommended above, we find that:

- The potential impacts of the Block Cave Amendment specifically to Infrastructure and Community Services are not significant.
- Residual adverse cumulative impacts to Infrastructure and Community Services are not significant.

#### 9.4.1.1.4 Proximity and Impacts to Tahltan communities

The Red Chris Mine is located approximately 18 km, 105 km, and 215 km by road southeast from Iskut, Dease Lake, and Telegraph Creek, respectively. The Red Chris Mine employs community members from all three

Tahltan communities. Through the IBCA, NRCML has committed to provide transportation to the mine site for Tahltan employees.

- For a fulsome description of impacts of the existing Red Chris Mine and the proposed Block Cave Amendment, see 9.4.1.1.3 (Infrastructure and Services) and 9.4.1.1.8 (Health and Wellbeing). These impacts are generally applicable to all three Tahltan communities.
- In addition to impacts to all three Tahltan communities, residents of Iskut have clearly articulated the presence of the Red Chris Mine in their territory disproportionately affects members of the Iskut community. We understand that the mechanisms for these impacts are largely due to the location of the mine on the Todagin Plateau—an area previously accessed heavily for Tahltan use and harvesting and rich in Tahltan culture and resources. Community members, remarking on the presence of the Red Chris Mine and deterioration of access to the Klappan from other factors have expressed they have, “nowhere to go”, to access their resources. Of further concern is the presence of the Red Chris Mine upstream of culture camps on the Klappan River and the potential impacts of the mine’s noise, light, and air quality, along with concerns about upstream water quality and the risk of catastrophic dam failure and downstream effects. Some residents of Iskut are also concerned that air and water quality impacts extend all the way to Iskut Village, though current air and water quality monitoring and hydrogeological understanding do not support this scenario. Harvesters further express concern of potential contamination of key waterways adjacent to the mine, including Kluea, Todagin, and Ealue Lakes and the Klappan River, concerned for both the potential effects on themselves as harvesters as well as for the health of fish and wildlife in the area. When combined with the health and socio-cultural effects on individuals, families, and communities associated with employment (see 9.4.1.1.3 and 9.4.1.1.8) for many in Iskut, who opposed the original approvals of the mine, further expansion of the Red Chris Mine is undesirable.
- Specific effects of the Block Cave Amendment for Iskut to consider include: increase of employment during construction and associated positive and negative effects on individual, family, and community wellbeing; reduction of noise from blasting in the open pit; and, reduction of particulate air emissions due to operations occurring underground. However, existing impacts of the Red Chris Mine will remain unchanged, and adverse effects to communities, including to Iskut, will persist. As the mine transitions to closure and post-closure, some of these effects will be reversed, with reclamation of the mine site and increased access for Tahltan members.
- Real and perceived negative effects of the Red Chris Mine must also be considered alongside the positive effects of the mine, including those to infrastructure and services listed in 9.4.1.1.3 and those related to employment detailed in 9.4.1.1.9. If the Block Cave Amendment does not proceed, then the most likely scenario is that the Red Chris Mine will move to closure (see more details in 9.4.1.1.5) which will greatly diminish positive effects of the mine.

Considering the above, and prior to applying conditions, we find that the effects of the Block Cave Mine specifically, will not have significant adverse effects. The Block Cave Amendment, when considered in addition to the existing mine and cumulatively with other current and predicted major projects in the region and when considering the current condition of communities in Tahltan Territory, will contribute to significant residual adverse cumulative effects.

**Recommended Conditions for Proximity and Impacts to Tahltan Communities (See Section 9.5.2 for full text of conditions)**

- 14. Air Quality
- 18. Tahltan Future Generations Plan
- 21. Offsite Ground Transportation Management Plan
- 23. Tahltan Human Health Monitoring and Management Plan
- 24. Social and Healthcare Services Closure Report
- 25. Regional Cumulative Effects Initiatives
- 26. Tahltan Regional Initiatives

- 27. Community Environmental Reporting Plan

Additional commitments to be appended to the existing IBCA that support communities include:

- Tahltan Way of Life Plan
- Tahltan Food Sovereignty Monitoring Plan
- Tahltan Socio-Cultural and Wellbeing Initiatives
- Tahltan Community Wellbeing Fund

**After Applying Conditions for Proximity and Impacts to Tahltan Communities** (See Section 9.6 for final conclusions)

Once applying the conditions recommended above, we find that:

- The potential impacts of the Block Cave Amendment specifically to Proximity and Impacts to Tahltan Communities are not significant.
- Residual adverse cumulative impacts to Proximity and Impacts to Tahltan Communities are not significant.

#### 9.4.1.1.5 Closure/Ability to Reclaim and Restore/Permanent Effects

Though all effects in the provincial and Tahltan assessments are considered across phases of the Block Cave Amendment, through to closure and post-closure, Tahltan asked for specific consideration of NRCML's closure plans in relation to Tahltan's Risk Assessment Factors #15 and #16 and Tahltan Sustainability Requirement #8.

Closure issues are complex and block cave closure is closely entwined with closure of the open pit and existing site. Issues are summarized as follows:

##### **The Existing Closure Plan**

- As per their *Mines Act* M240 Permit, NRCML must maintain and renew every five years a plan to develop and then close the Red Chris Mine. This is the current Red Chris Closure Plan.
- Existing regulatory requirements dictate how closure must occur, including requirements of the existing Environmental Assessment Certificate.
- Closure of a mine the size and complexity of the Red Chris Mine will require multi-decade planning, implementation, and post-closure management. While physical reclamation activities may occur over an estimated 6 years, long-term management of water, landform stability, and ecological recovery will extend far beyond the active closure period
- As per the current Red Chris Closure Plan that adheres to regulatory requirements, much of the lands within the Permitted Mine Area will be reclaimed and replanted to promote regeneration of natural ecosystems
- Despite progressive reclamation and closure efforts, several large-scale mine features will remain permanently on the landscape and must be managed as long-term closure liabilities, including: a flooded TIA and dam infrastructure; a covered RSA; a flooded pit; water management infrastructure, including pumping, treatment systems, and associated conveyance infrastructure required to manage water levels and maintain water quality potentially on a long-term or perpetual basis; and, necessary site maintenance infrastructure.

### **The Existing Closure Plan as Amended for Block Cave**

- While many closure elements (e.g., tailings and water management, long-term monitoring, and maintenance) may remain broadly similar for the Block Cave Amendment compared to the existing closure plan, transition to Block Caving introduces closure and reclamation challenges that are distinct. Most notably, Block Cave will lead to creation of a permanent subsidence zone, altered landform stability, potential for time-dependent deterioration of ground conditions and support, and potential changes to groundwater and surface-water flow paths and connectivity that can affect long-term water quality management. These Block Cave-specific risks are particularly relevant to long-term closure land stability, water management, and reclamation opportunities.
- Though the size and shape of the subsidence zone is predicted to remain largely in the confines of the current open pit, exact dimensions, and extent of an eventual 'exclusion zone' for safety around the subsidence zone requires further confirmation. As discussed in 9.4.1.1.2, potential connections for water between a flooded subsidence zone and the Kluea Lake Watershed, and any potential influence on the Kluea Lake Landslide complex, must be further monitored and confirmed.
- Closing a mine requires significant financial investment. Newmont provided information in the Amendment Application (Section 4.2.1.3.6) on their financial capacities to support comprehensive closure and said, in part, *"the Newmont's comprehensive global Closure Strategy integrates closure planning throughout each operation's lifespan. This strategy is supported by a robust governance framework, including a Closure and Reclamation Management Standard that establishes requirements for planning and managing closure activities. Additionally, Newmont's strong financial performance in 2023 along with direct economic contributions to closure totalling \$11.1 billion, indicates a reliable financial foundation and commitment to the responsible long-term management of mining legacy."*
- The Red Chris Closure Plan for both the existing open pit mine and the proposed Block Cave does not meet the Tahltan Sustainability Requirements, primarily due to the expectation of perpetual water treatment and long-term engineered management of mine infrastructure.

### **Active Measures to Improve the Red Chris Closure Plan**

- Newmont, when gaining ownership of NRCML and completing internal reviews, recognized that the current closure plan does not meet their internal standards nor Tahltan expectations.
- Two avenues are currently advancing to address outstanding concerns:
  1. Tahltan Future Generations Plan  
In 2025, as required by the M240 permit, Tahltan and NRCML engaged to develop collaborative objectives to guide site closure, titled the Red Chris End Land Use and Social Closure Plan (ELUSC Plan). Finalization of the ELUSC Plan continues, with an expected first edition produced in 2026. The ELUSC Plan will require adaptive management and regular updates to reflect realities of a changing mine site. When complete, this ELUSC Plan is expected to contain overarching closure objectives that align with Tahltan Stewardship Plan objectives.
  2. A Closure Alternatives Study  
To assess whether and how technical changes can be made to the current Red Chris Closure Plan, NRCML has entered into a Closure Alternatives Study. THREAT members are participating as technical representatives of TCG in all aspects of the Closure Alternatives Study. The Closure Alternatives Study is expected to continue until 2028 and will result in "preferred alternatives" for RSA and TIA closure that are expected to differ from the current Red Chris Closure Plan
- Once the Closure Alternatives Study is complete, NRCML has multiple steps of further work to confirm a new closure pathway, develop designs, and internally approve a new closure approach. At earliest, NRCML has signalled that components of an updated Red Chris Closure Plan may be presented in their required 2031 update to their Mine Plan and Reclamation and Closure update required by their Mines Act permit.

### **Potential Future Scenarios**

- NRCML has confirmed that, if not converted to Block Cave, the Red Chris Mine as an open pit mine will become uneconomical, and will be moved to close. Closure of the open pit would enact the current

Red Chris Closure Plan, which does not meet the Tahltan Sustainability Requirements or NRCML standards.

- The current bond held by BC government for mine closure has been substantially increased over recent years, including in the most recent Mines Act amendment to address outstanding concerns related to water management at closure. The current bond held by the Province for the Red Chris Mine is \$246,910,000.
- With the conversion to Block Cave the bond is expected to increase to account for closure of Block Cave components to \$337,650,500.00, subject to conclusion of review of the Mines Act permit.
- NRCML has submitted an application to have the Exploration Incentive Security applied against the reclamation security for the Red Chris Mine. The amount identified by NRCML as being eligible for the Block Cave Amendment under the next available opportunity in the M-240 permit was listed at \$84,037,654.

Given the context established above, before applying conditions, and considering that the Red Chris Closure Plan does not meet Tahltan Sustainability Requirements, we find that the Block Cave Amendment, using the current Red Chris Closure Plan, is predicted to have significant adverse effects, including cumulative residual adverse effects.

**Recommended Conditions for Closure (See Section 9.5.2 for full text of conditions)**

- 11. Tahltan Sustainability Reporting
- 16. Closure Streamflow Report
- 18. Tahltan Future Generations Plan
- 19. Closure Study Report
- 20. Ground Stability Reports
- 24. Social and Healthcare Services Closure Report

Given the findings of significance and the importance of generational wellbeing for Tahltan, the majority of conditions related to closure are embedded in the EAC certificate. Additionally, most recommended EAC conditions apply to all phases of the Amendment (construction, operations, closure, post-closure). However, bilateral commitments in the IBCA Addendum overlap and support these conditions, including:

- Tahltan Way of Life Plan
- Red Chris Advisory Committee approval of ELUSC objectives

**After Applying Conditions for Closure/Ability to Reclaim and Restore (See Section 9.6 for final conclusions)**

Once applying the conditions recommended above, we find that:

- The potential impacts of the Block Cave Amendment specifically to Closure/Ability to Reclaim and Restore are not significant.
- Residual adverse cumulative impacts to Closure/Ability to Reclaim and Restore are significant.

**9.4.1.1.6 Quality of Baseline Information**

Given that the Red Chris Mine is an existing, operating mine, a range of monitoring is required at the site by existing regulatory permits. Key environmental monitoring programs are ongoing at the mine and are reviewed regularly by THREAT, and at minimum by BC, TCG, and NRCML as part of annual Red Chris Management Committee (RCMC) meetings (See section 4.1.3.2 for more information). THREAT continues to actively advocate for additional monitoring of key parameters at priority areas that require improvement as new data is available and site understanding (particularly of hydrogeology) improves. Annual review and adjustment to

monitoring as part of an adaptive management cycle is required for all key environmental parameters and management plans used at site.

Regardless of the above, the Red Chris Mine applied for and received their original Environmental Assessment Certificate on 2005 at which time requirements for baseline data gathering were much less stringent. As such, our review of the amendment was hampered by an absence of pre-mine data for some values or pre-mine data that is limited in time and geographic coverage. For example, we have limited baseline data for water quality measurements at key locations that are now proving to be potentially affected by seepage, including for key lakes and waterways important to Tahltan including, Kluea Lake, Todagin Lake, and Ealue Lake. Additionally, pre-mine data to inform human-health measurements and monitoring were also lacking or inconsistent with monitoring nodes, including for soil quality, air quality, and metal uptake in vegetation.

Due to the progressive development of the Red Chris Mine, we are also lacking definitive data informing our understanding of the hydrogeology underlying the Northeast Arm (NEA) of the TIA. Though flooding of the NEA is already permitted as part of the original TIA design, the TIA has not yet reached an elevation to flood the NEA. We have learned from observing flooding of the north and south valleys of the TIA, that a much more detailed understanding of the underlying geology and hydrogeology of the entire TIA is needed to accurately predict and manage seepage.

During review of the Amendment Application, THREAT also identified an interest in gaining more baseline hydrogeological data between the planned Block Cave and Kluea Lake watershed. The Amendment Application asserts that the Block Cave and eventual subsidence zone will act as a water sink, with all water flow directed to the cave, including through closure and post-closure. THREAT reviewers requested additional data to support this assertion and to confirm whether there was any potential for hydraulic connectivity between the Block Cave and the Kluea Lake watershed via groundwater pathways at depths less than 200m. THREAT is particularly concerned that lack of understanding of connectivity could lead to potential water quality impacts at closure when the subsidence zone is flooded. As an additional complication, the area between the Block Cave and Kluea Lake Watershed is influenced by the Kluea Lake Landslide Complex. THREAT would like to see more data from the landslide complex to understand the potential for connectivity, and to confirm the potential for ground stability issues to affect connectivity, particularly during closure and post-closure.

Finally, THREAT has flagged an increasing concern that baseline data for health of lakes, (i.e. NRCML's 'reference lakes' to inform their Aquatics Effects Monitoring Program), are at risk of water quality impacts from the mine, thus diminishing their reliability to act as true references and allow for identification of mine effects. THREAT continues to advocate for the need to add reference lakes to NRCML's Aquatics Effects Monitoring Program.

Though the data concerns listed above hampered aspects of the TCG Lands Department's review of the Amendment Application, we also recognize that we never have a perfect understanding of a mine site, and as such, must ensure we plan for uncertainties, set the stage for strong monitoring, and expect regular, adaptive management to address areas of concern.

Given the above, we do not find that there are significant effects related to availability and confidence of baseline data specific to this amendment, but there remain concerns in the confidence of the baseline information and existing uncertainties requiring to be met as part of the recommended conditions. As noted, there are concerns with the uncertainties and confidence with the baseline data for at Red Chris and thus have included considerations for addressing baseline data gaps in a number of recommended conditions (see below).

#### **Recommended Conditions for Baseline Information (See Section 6.5.1.1 for full text of conditions)**

We believe aspects of data collection and data quality assurance need to be strengthened, uncertainties addressed, and confidence increased, and have included requirements in a number of technical conditions to address baseline data gaps and uncertainty. We have further included requirements for verification of predictions and verification of models in technical conditions including those for water, closure, ground stability, and human health. Finally, we have included in a number of conditions requirements to re-assess impacts to Tahltan should, following monitoring, effects of the Block Cave Amendment prove different than those considered and assessed in the Amendment Application.

Additional commitments to be appended to the existing IBCA that support Baseline Information and must meet Tahltan Satisfaction, include:

- New Environmental Effects, (including New Environmental effect funding, investigation, and mitigation)

- Adaptive Management and Sustainability Framework

**After Applying Conditions for Quality of Baseline Information** (See Section 9.6 for final conclusions)

Once applying the conditions recommended above, we find that:

- There are not significant residual adverse effects associated with quality of baseline information.
- Residual adverse cumulative impacts for quality of baseline data are not significant.

**9.4.1.1.7 Alignment with Tahltan Stewardship Plan**

As identified in Table 9, there is a complex of management directions to be met under this Tahltan Risk Assessment interconnected to the assessment of Core Priorities against the current and future state of resource development, degraded landscapes, socio-cultural impacts, and effects to Tahltan way of life and quiet enjoyment of the land. The Łuwechōn Deferral Area is not well aligned with the current resource development tenures, interests, and development (including the Red Chris Mine) against the directions to protect community, sacred, food security, and quiet enjoyment of the land for several generations. Given the existence of the Red Chris Mine and the rich mineral deposits in the area, additional development decisions beyond Red Chris Mine are deferred to future generations.

The proposed Block Cave Amendment does not change the alignment of the Red Chris AOI with direction of the Łuwechōn Deferral Area, and the AOI remains “Impacted” regardless of the outcomes of the Consent decision. However, based on the information shared for this TRA, approval of the Block Cave Amendment will prolong the presence of an operating Red Chris Mine within the TRA with a projected life span of twelve years of Block Cave operations. Developing Block Cave may also allow for additional block cave development beyond Macro Block 1, and additional decades of Red Chris operations, should future ‘Substantial Changes’ be approved by Tahltan under the Declaration Act Agreement.

Given the above, and before applying conditions, we find that the potential impacts of the Block Cave Amendment specifically to Alignment with Tahltan Stewardship Plan are contributing current and future singular and cumulative effects to the overall set of management directions, but singular potential effects from the amendment are not significant at broader scales of the TSP. However, given the existing misalignment of management directions for the Łuwechōn Deferral Area and the existing and projected “impacted” nature of the Red Chris AOI, we find the Block Cave Amendment will result in significant residual adverse cumulative impacts for alignment with the Tahltan Stewardship Plan, prior to applying conditions.

**Recommended Conditions for Alignment with Tahltan Stewardship Plan** (See Section 9.5.2 for full text of conditions)

- 11. Tahltan Sustainability Reporting
- 18. Tahltan Future Generations Plan

Additional commitments to be appended to the existing IBCA that support alignment with the TSP include:

- Tahltan Way of Life Plan
- Tahltan Food Sovereignty Monitoring Plan
- Archaeology and Heritage Commitments

**After Applying Conditions for Alignment with Tahltan Stewardship Plan** (See Section 9.6 for final conclusions)

Once applying the conditions recommended above, we find that:

- The potential impacts of the Block Cave Amendment specifically to Alignment with Tahltan Stewardship Plan are not significant.

- Residual adverse cumulative impacts to Alignment with the Tahltan Stewardship Plan are not significant

#### 9.4.1.1.8 Tahltan Health and Wellbeing

The topic of health is scoped widely for the Tahltan Risk Assessment. This means that to understand effects on health as a result of the Block Cave Amendment, we considered effects to a number of different Tahltan values holistically, including the Tahltan Values of: Human Health; Employment and Economy; Infrastructure and Services; Use of Lands and Resources for the Exercise of Tahltan Rights; Social and Cultural Relationship to the Land and Each Other; Peaceful Enjoyment of the Land. We also considered health effects when assessing impacts to Tahltan Core Priorities, including Tahltan way of life and ability to reclaim and restore.

To understand effects on health, we had to consider effects of the current the Red Chris Mine as well as potential health effects of the proposed Block Cave Amendment. We considered a number of inputs in assessing impacts to health, including: Tahltan Socio-Economic Baseline Report (2024) which considered results of surveys of Tahltan members in 2020 and 2021; results of NRCML's rapid Health Impact Assessment (rHIA) as detailed in the Amendment Application; and, results of a Site Wide Human Health Risk Assessment (HHRA) and detailed Human Health Risk Assessment (dHIA), submitted in November 2025 which considered effects of the Red Chris Mine across various development scenarios, including the Block Cave Amendment. We also considered what has and continues to be discussed through the Social Cultural Committee (SCC) under the IBCA, and what we heard from Tahltan members and employees during engagement on the Block Cave Amendment. To note, health of employees while on shift at the Red Chris Mine was not scoped into this assessment; workplace health and safety is governed by processes separate from the environmental assessment review. Nevertheless, employee health when not on shift (including off shift but at the worker camp) and at home in Tahltan communities was assessed, and employee health is an area recommended for future focus and recommended conditions.

Health of Tahltan members is also under pressure from multiple different sources, only one of which is the Red Chris Mine. To carry out a fair and reasonable assessment, we needed to confirm the effects of the Red Chris Mine, consider whether there will be additional, predicted overlapping impacts from other current or proposed major projects, and consider that major projects play a role in, but only partially contribute to, Tahltan health and wellbeing.

Key outcomes of the various assessments listed above include:

##### **Human Biophysical Health**

- Assessment of various pathways of effects from the Red Chris Mine (regardless of open pit or Block Cave) to human exposure (inhalation, consumption of water, vegetation, fish, game, waterfowl, etc.), or dermal contact (e.g. swimming, touching, etc.) revealed an increase in health risk from several avenues, but none of the health risks are expected to cause negative impacts to human health of Tahltan members due to the low magnitude of the increased risks.

##### **Community Health and Wellbeing**

- Through analysis of 22 pathways/determinants of health analyzed in the dHIA, a number of effects of the current mine are recognized. These effects are tied to many factors, including:
  - Impacts of the 2-week rotation on employee mental health, family wellbeing, community and cultural wellbeing, and availability to participate in cultural and on-the-land activities
  - Changes in Tahltan relationship to the land, stewardship and governance due to isolation from traditional lands (which could improve at closure)
  - Impact on safety of women related to residency in the worker camp and road traffic safety
  - Impacts of increased salaries on employees leading to positive as well as negative effects on individual and family wellbeing, cultural wellbeing, and addictions and mental health
  - Combined impact of the mine with social impacts of external factors such as the COVID pandemic and feelings of social isolation, cultural disconnection, and general decline in mental health and resilience
  - Acute impacts predicted at closure with large scale loss of employment for Tahltan members

##### **Specific predicted impacts of the Block Cave Amendment**

- The projected risks to individual-level biophysical human health (from the HHRA) are generally the same for the open pit mining, Block Cave mining, closure and post closure mine phases indicating that the Block Cave mining phase is not expected to materially increase or change risks from existing conditions (open pit mine phase).
- Some air quality parameters (e.g. particulate emissions including 'dust') are predicted to improve with a transition to Block Cave mining, though some smaller particulate matter fractions have predicted increases at locations along the east side of the mine permit boundary. These exceedances are generally associated with the use of back-up generator power at the site, and are thus only expected during upset conditions (e.g. when the mine loses power and must use back-up generator power).
- Effects of the existing Red Chris Mine to human wellbeing will persist with the conversion to Block Cave, and:
  - With increased construction workforce (approximate increase of 300 positions) during the three-year construction window, there will be a potential increased risk for the safety of women at the worker camp without additional mitigations
  - Wellbeing will decline at mine closure if Red Chris employees do not find alternative and comparable employment

**Specific recommendations from the HHRA and dHIA included:**

1. Exercise the existing IBCA and any amendments to minimize negative social impacts and maximize economic opportunities
2. Human health engagement with Tahltan
3. Continued environmental quality monitoring
4. Country Foods Program to analyse potential metal uptake in Tahltan harvested foods
5. Human health and well-being survey/monitoring
6. Air quality concerns reporting program as a component of the Air Quality and Fugitive Dust Management Plan
7. Continued grievance reporting and adaptive management
8. Participation in health care system capacity audit
9. Site safety initiatives for the safety of women
10. Elder and youth inclusion in community-based engagement and planning activities
11. Further consideration of the health of mine workers, as requested by Tahltan, as it was outside the scope of the dHIA

Given the above, and prior to applying conditions, we find that the Block Cave Amendment specifically is not predicted to have significant adverse effects. The Block Cave Amendment, when considered in addition to the existing mine and cumulatively with other current and predicted major projects in the region and when considering the current condition of community wellbeing in Tahltan Territory, will contribute to significant residual adverse cumulative effects, continuing to impact Tahltan way of life with the potential for multi-generational effects.

**Recommended Conditions for Community Wellbeing (See Section 9.5.2 for full text of conditions)**

Given that Tahltan human wellbeing remains under stress from a multitude of factors, with the mine as one contributor, we recommend a series of conditions to facilitate support by NRCML to monitor and contribute to improving Tahltan individual, family, and community health. These recommendations are in part to address previous gaps in health monitoring that are generally expected of major project operators but weren't originally prescribed with the Red Chris Mine' previous authorizations, and in part for NRCML to play a role in the collective mission to work with TCG and Tahltan communities to improve overall Tahltan health and wellbeing.

Conditions to support Community Wellbeing:

- 23. Tahltan Human Health Monitoring and Management Plan
- 24. Social and Healthcare Services Closure Report

- 25. Regional Cumulative Effects Initiatives
- 26. Tahltan Regional Initiatives
- 27. Community Environmental Reporting Plan

Additional commitments to be appended to the existing IBCA that support Health and Wellbeing, include:

- Tahltan Way of Life Plan
- Tahltan Food Sovereignty Monitoring Plan
- Socio-Cultural Health and Wellness Initiatives
- Implementing recommendations from the detailed Health Impact Assessment
- Tahltan Community Wellbeing Fund

**After Applying Conditions for Tahltan Health and Wellbeing** (See Section 9.6 for final conclusions)

Once applying the conditions recommended above, we find that:

- The potential impacts of the Block Cave Amendment specifically to Tahltan Health and Wellbeing are not significant.
- Residual adverse cumulative impacts to Tahltan Health and Wellbeing are not significant

9.4.1.1.9 Economic Impact, Employment, and Training

Overall, we find that the Block Cave Amendment will generally have positive effects on Economics, Employment and Training, with some caveats. Key messages include:

- NRCML states in their Amendment Application that conversion to Block Cave will have a number of positive effects to Tahltan (see Section 9.2.1.3), including enhanced economic opportunities associated with:
  - Extending the operating mine life beyond 2040, maintaining jobs, contracting opportunities, royalty revenues, and existing benefits described in the IBCA including prioritized Tahltan hiring, business opportunities, continuous engagement, and workforce development initiatives.
  - Increased economic opportunities through the construction phase of the Block Cave Amendment, estimated to be worth over \$2 Billion, especially for Tahltan businesses involved in, “earthworks, steel structure erection, safety flagging and traffic controls, concrete and aggregate, equipment rentals, and other key services.” (NRCML 2025c).
- The Red Chris Mine currently employs approximately 120 Tahltan members who reside both in Tahltan Territory and elsewhere. When considering TNDC contracts, NRCML estimates the existing Red Chris Mine supports 220 Tahltan members. Newmont has contributed meaningfully to Tahltan Territory in relation to the existing open pit.
- Transportation of workers to site and required 2-week residency are expected to remain through construction and operation of the Block Cave Amendment. Tahltan members have reported that transportation commitments of NRCML have inadvertently caused out-migration of Tahltan members from Tahltan Territory and communities, given that they can maintain high-paying jobs at the mine, but relocate to larger centres in BC and Canada. NRCML employee tracking does not show that outmigration is a pattern among its Tahltan employees. For Iskut residents, the required 2-week residency is particularly frustrating, when their primary residence and family members are within a 25km commute.
- After the construction phase, when site will have the capacity to house 1500 workers, NRCML expects operations employment numbers to be relatively similar to current levels. The characteristics of some jobs on site will change substantially, especially when considering the change from open pit heavy

equipment operator job requirements to highly technical, engineering-specific underground operations support positions. Underground works are further expected to be highly automated, and for those manual jobs, converting to underground work may be challenging or undesirable for some Tahltan employees.

- NRCML has committed to developing a Workforce Transition Plan to support the transition from open pit to Block Cave mining. The Amendment Application states that the Workforce Transition Plan will include: the development of change management processes; identification of transition roles; development of skill gap analyses and matrices; and delivery of underground- specific training. NRCML has further committed that a “Tahltan-specific training component will be developed in partnership with the TCG and TNDC to develop portable skills and support long-term employment opportunities across various sectors.”
- When considering employment from a cumulative perspective, we must also consider the likely reality that the Block Cave Amendment construction and operations phases will likely overlap with other major project development in the Territory, starting with the construction of the Eskay Creek Revitalization Project. Eskay Creek Project Overview estimates a peak construction workforce of up to 949 workers and an operations workforce of up to 771 workers. Competition for skilled and experienced employees is already being witnessed in the region, which is only projected to increase. Higher-paying mining sector jobs draw many skilled workers from essential community-based service jobs such as in administration, healthcare and childcare, and reduce the number of in-community cultural knowledge holders to uphold cultural duties.
- Workforce requirements are forecast to decline steeply for closure and post-closure phases of mine life. Closure will require some continued employment for specific sectors, but intensive on-site closure activity is estimated to last for six years. Post-closure will only require maintenance and monitoring positions, which could be well suited to in-Territory Tahltan employees. The current closure plan, requiring perpetual water pumping and treatment, may further require skilled operators, but employment requirements will remain limited. Economic effects of closure are expected to affect individual Tahltan employees, but will also impact Tahltan families, communities, Tahltan businesses, the local and regional community services and the Tahltan Nation as a whole. Should closure of Red Chris Mine overlap with closure of other large-scale employers of Tahltan members, the effects on Tahltan members and communities will compound.

Overall, and prior to applying conditions, we find that the effect of the Block Cave Amendment on employment and training will not be significant. However, continued efforts to work with NRCML to ensure employment and training benefits flow to Tahltan members and communities must continue and be enhanced to ensure the maximum benefits possible are delivered to Tahltan through the Block Cave Amendment, and adverse effects associated with employment, including from the 2-week residency/Fly-In, Fly-out requirements are further mitigated.

**Recommended Conditions for Economic Impact, Employment, and Training (See Section 9.5.2 for full text of conditions)**

18. Tahltan Future Generations Plan
24. Social and Healthcare Services Closure Report

Additional commitments to be appended to the existing IBCA that support Employment and Training include:

- Tahltan Worker Transition Plan
- Business Opportunities and Transition
- Socio-Cultural Health and Wellness Initiatives and Measures
- Community, Culture, and Wellbeing Team
- Business, Procurement and Contracting Team
- Education, Training and Employment Team

**After Applying Conditions for Alignment with Economic Impact, Employment, and Training** (See Section 9.6 for final conclusions)

Once applying the conditions recommended above, we find that:

- The potential impacts of the Block Cave Amendment specifically to Economic Impact, Employment, and Training are not significant.
- Residual adverse cumulative impacts to Economic Impact, Employment, and Training are not significant.

#### **9.4.2 Tahltan Sustainability Requirements**

The in-depth analysis of Tahltan Risk Assessment Factors, above, informs the more general responses to the Tahltan Sustainability Requirements which are set out below.

1. Meets the requirements of the 1910 Declaration of the Tahltan Tribe regarding governance, sovereignty, jurisdiction and authorities.

Overall, we find that the Block Cave Amendment and the processes used to assess and decide whether it can proceed largely meet the expectations of the 1910 Declaration based on the fact that the TCG retain legal decision making authority on this amendment, as per the Declaration Act Agreement. We recognize:

- With the requirement for a TCG *Notice of Decision*, Tahltan's ability to decide whether to consent to the Block Cave Amendment and any terms and conditions that must be included in the Amendment Order has been recognized.
- The existing Red Chris Management Agreement dictates Tahltan and the Province of BC must work collaboratively to oversee mine operations and monitoring results, allowing Tahltan and the Province to guide ongoing adaptive management at the Red Chris Mine.
- The existing IBCA has commitments to collaboratively manage mine operations with Tahltan. The proposed amendment to the IBCA will strengthen several aspects of environmental management that have been lacking to date.
- The draft permits that will be amended to guide Block Cave development are being developed collaboratively and are expected to address more detailed aspects of Tahltan concerns emerging from review of the Block Cave Amendment, and further build on recommended EAC conditions.
- Tahltan and the Province are advancing reconciliation negotiations.

The following recommended conditions further strengthen alignment with this Sustainability Criteria:

8. Tahltan Satisfaction
9. Work With Condition
11. Tahltan Sustainability Reporting
18. Tahltan Future Generations Plan
19. Closure Study Report

2. Meets the principles of the Tahltan Resource Development Policy

Throughout this assessment, we have analyzed the 8 expectations of the Tahltan Resource Development Policy, though some aspects of the Policy fall more squarely within the confidential details of the existing IBCA. Please see below references to where we have considered the Tahltan Resource Development Policy in different sections of this Tahltan Risk Assessment, and whether the Block Cave Amendment meets the requirements of the policy. Overall, most principles of the Tahltan Resource Development Policy are met.

Resource Development Policy Requirement	Met/Not Met	Location of Details in this Report
1. assurance that the development will not pose a threat of irreparable environmental damage;	Mixed	See Risk Assessment Criteria Narrative 9.4.1.1.5 regarding closure. See Section 9.3.3 for alignment with Tahltan Core Priority of "Ability to Reclaim and Restore". With conditions, the Block Cave Amendment aligns with this requirement. However, after consideration of conditions, concern remains that the permanent impacts of the existing Red Chris Mine, including conversion to Block Cave, does not allow this requirement to be met (see Tahltan Sustainability Criteria 8 for more detail).
2. assurance that the development will not jeopardize, prejudice or otherwise compromise the outstanding Tahltan aboriginal rights claim;	Met	Recognition of Tahltan Rights and Title continues to be strong and increasingly implemented through commitments such as the Declaration Act Agreement, ongoing negotiations with the federal and provincial governments to implement and advance the Tahltan Stewardship Plan, and the Foundation Agreement negotiations.
3. assurance that the project will provide more positive than negative social impacts on Tahltan people;	Mixed	The Red Chris Mine provides a range of positive impacts to Tahltan, largely guided by the existing IBCA (see Section 9.2.1.3 and Section 4.1.3.1). The Block Cave Amendment is expected to extend and increase positive impacts. Nevertheless, negative impacts remain. A direct comparison of positive versus negative impacts of the Amendment may vary largely depending on Tahltan perspectives and experiences.
4. provision for the widest possible opportunity for education and direct employment-related training for Tahltan people in connection with the project	Met	NRCML and Tahltan have existing commitments for education and training as outlined in the existing IBCA. Conversion to Block Cave changes education and training needs. To support the change in needs, NRCML has committed to: <ul style="list-style-type: none"> <li>- Workforce Transition Plan</li> <li>- Workforce Development Strategy</li> </ul>
5. provision for the widest possible opportunity for employment opportunities for Tahltan people with respect to all phases of the development	Met	NRCML and Tahltan have existing commitments for employment opportunities as outlined in the existing IBCA. Conversion to Block Cave changes employment needs. To support these needs, NRCML has committed to: <ul style="list-style-type: none"> <li>- Workforce Transition Plan</li> <li>- Workforce Development Strategy</li> </ul>
6. provision for substantial equity participation by Tahltans in the total project;	Not met	Tahltan does not have an equity stake in the proposed Block Cave Amendment, though does receive economic benefits through the provisions of the existing IBCA. The Amendment is not expected to change equity status.
7. provision for the widest possible development of Tahltan business opportunities over which the developer may have control or influence	Met	NRCML and Tahltan have existing commitments for contracting opportunities as outlined in the existing IBCA. Conversion to Block Cave expands contracting needs.
8. provision of the developer to assist the Tahltans to accomplish the objectives stated above by providing financial and managerial assistance and advice where deemed necessary.	Met	NRCML and Tahltan have existing commitments for general financial and managerial assistance as outlined in the existing IBCA. Conversion to Block Cave does not change this commitment.

3. Is consistent with applicable Tahltan lands governance policies

The methodology for this assessment was developed to align with Tahltan Law and Stewardship Principles, described in Section 3.2. The Declaration Act Agreement recognizes and affirms Tahltan decision making authority as expressed in the Tahltan 1910 Declaration.

4. Is consistent with fundamental Tahltan land and resource principles

This assessment compared the proposed Block Cave Amendment to the Tahltan Stewardship Plan with the Tahltan Core Priorities, largely comparing TSP Management direction to the current and future of the Red Chris Mine with and without the proposed Block Cave Amendment. We found that the existing Red Chris Mine and the Block Cave Amendment do not align with the management direction in the Łuwechōn Deferral Area, and are inconsistent with other plan management directions, but given the existing presence of the Red Chris Mine, the decision as to whether mining continues in this area is deferred to future generations.

We further assessed the Block Cave Amendment compared to Tahltan Core Priorities. The existing Red Chris and the Block Cave Amendment, before applying conditions, do not meet all Tahltan Core Priorities, summarized as follows:

**Health of Lands and Waters:** Effects are focused mainly at the Red Chris Mine AOI and along Highway Corridors. Some positive environmental effects of the Amendment are recognized, but existing effects along with new effects of the Block Cave Amendment will continue to compromise the Health of Lands and Waters and drive change in condition at the Highways and Red Chris Mine AOI scales.

**Tahltan Way of Life:** The Block Cave Amendment will impact Tahltan Way of Life at the Red Chris Mine, Highways, Communities, and Consent AOI scales. Tahltan Way of Life is already impacted across all AOIs by multiple sources and across history. Benefits may temper some of the negative effects, especially in the Communities AOI, but Tahltan Way of Life will continue to be compromised across AOIs.

**Rights and Title:** The impacts of the Block Cave Amendment are mixed on Tahltan's Rights and Title, with increased recognition of Tahltan governance and role in collaborative management, but also continued cumulative impacts to Rights and Title in the area, long term exclusion from important cultural lands and resources and inability to carry-out and pass on rights-based practices. At the Red Chris and Consent Area AOIs, the effects of the Amendment on Tahltan Rights and Title are one driver for a decrease in condition ratings with the Amendment.

**Ability to Reclaim and Restore:** Though the Block Cave Amendment does not drastically alter the existing reality of long-term impacts from the Red Chris Mine, it introduces changes to the Red Chris Mine infrastructure and perpetuates the generational impact of the mine on Tahltan communities. The continued operation of Red Chris Mine through the Block Cave Amendment will allow additional time to improve closure plans. However, the permanent effects of Red Chris in the Red Chris AOI and on communities, coupled with uncertainty regarding the potential for a sustainable closure plan drives some of the change of conditions at the Red Chris Mine AOI.

Application of conditions improves alignment with core priorities across all AOIs, though the Red Chris AOI remains, "Impacted" and the Consent Area AOI remains, "Degraded" when considering effects across all AOIs after applying conditions (see Table 29).

5. Would have impacts to fish or wildlife that cannot be addressed through existing fish and wildlife management strategies in Tahltan Territory.

Though the existing Red Chris Mine has effects on fish and wildlife that are continuously monitored and managed through collaborative efforts of NRCML, BC, and TCG (see Section 4.1.3 describing existing regulatory regime). The proposed Block Cave Amendment is not predicted to have severe effects on wildlife or fish, as per the assessment carried out on Tahltan Values in Section 9.3 and assessment of Tahltan Core Priority, "Health of Lands and Waters" in Section 9.3.3. Tahltan is closely monitoring water quality impacts of the existing Red Chris Mine for any potential impacts on fish that could be connected to water quantity or quality impacts, described in the Risk Assessment Factor narrative 9.4.1.1.2. To fill a gap identified in the Tahltan Risk Assessment, we further recommend a condition to ensure metal uptake monitoring is done for wildlife, including birds, in addition to fish:

- 22. Wildlife Management Plan Updates

Additional bi-lateral commitments related to fish and wildlife include:

- Reference Lake Report

After applying conditions, the proposed Amendment aligns with this Sustainability Criteria.

6. Would have impacts to land, water, fish or wildlife that would impact the ability of Tahltan current and future generations to maintain the Tahltan way of life.

The existing Red Chris Mine has effects on land, water, fish and wildlife. Existing impacts of the Red Chris Mine on land and waters remain a concern. Effects to land and water were assessed through assessment of effects on Tahltan Values in Section 9.3 and assessment of impact on Tahltan Core Priority, Tahltan way of life in Section 9.3.3. Further description of impacts on water quantity and quality are described in Risk Assessment narrative 9.4.1.1.2.

The following recommended conditions are designed to address effects to Tahltan Land, water, fish, or wildlife:

- 14. Air Quality
- 15. Seepage Mitigation Report
- 16. Closure Streamflow Report
- 17. Kluea Lake Watershed Hydraulic Connectivity Monitoring Plan
- 18. Tahltan Future Generations Plan
- 19. Closure Study Report
- 20. Ground Stability Reports
- 21. Offsite Ground Transportation Management Plan
- 22. Wildlife Management Plan Updates
- 23. Tahltan Human Health Monitoring and Management Plan
- 27. Community Environmental Reporting Plan

Additional bi-lateral commitments to support Tahltan Way of Life include:

- Tahltan Way of Life Plan
- Tahltan Food Sovereignty Plan
- Tahltan Emergency Response Plan

After applying conditions, the proposed Amendment aligns with this Sustainability Criteria.

7. Allows the land and water to be returned to a level of environmental health to support Tahltan's Rights and Title and land uses across the Tahltan Continuum, with a focus on future land use by Tahltan.

This assessment considered the Tahltan Core Priority of, "Ability to Reclaim and Restore". Though much of the mine area can be reclaimed and restored, there will also be permanent alterations to the area. The proposed Block Cave Amendment does not markedly change the ability to reclaim and restore the Red Chris Mine site, but conversion to Block Cave does avoid near-term implementation of the current Red Chris Closure Plan and allow for the continued development of an improved closure plan. See Tahltan Risk Assessment closure assessment for further detail (Section 9.4.1.1.5).

Conditions related to the ability to reclaim and restore include:

- 16. Closure Streamflow Report
- 17. Kluea Lake Watershed Hydraulic Connectivity Monitoring Plan
- 18. Tahltan Future Generations Plan

- 19. Closure Study Report

8. Does not require mitigations, treatment, or monitoring beyond closure (i.e. will not require treatment of the land and water in perpetuity to maintain them at near normal levels).

Based on the current Red Chris Closure Plan, the Red Chris Mine will require mitigations and treatment beyond closure (See Risk Assessment Narrative 9.4.1.1.5). The proposed Block Cave Amendment will not change this reality. However, advancing the Block Cave Amendment will provide the additional time needed to develop a new closure plan that will, be more aligned with this Tahltan Sustainability Requirement. NRCML has expressed that complete alignment (e.g. no treatment or mitigations at closure) will be unlikely. However, the collaboratively developed End Land Use and Social Closure Plan includes objectives of to work to align site closure with Tahltan Stewardship Plan objectives, confirming all parties' support for moving the site to a closure state that requires minimal active management.

The conditions recommended below will further require closure planning to better align with Tahltan Sustainability Criteria:

- 11. Tahltan Sustainability Reporting
- 18. Tahltan Future Generations Plan
- 19. Closure Study Report

Though the conditions bring additional confidence to Tahltan that future closure planning will improve alignment with this Sustainability Requirement, the requirement remains unmet.

9. Does not restrict Tahltan from meeting food security needs or conducting social, cultural, spiritual, and environmental practices.

This assessment considered the influence of the Block Cave Amendment on Tahltan's food security and social, spiritual, and environmental practice through examination of the Tahltan Core Priorities of Rights and Title, Health of Lands and Water, and Tahltan Way of Life. The existing Red Chris Mine effects Tahltan members' ability to access the Red Chris Mine area and exercise their rights, including traditional harvesting to support food security and way of life needs. Tahltan members' perception of access restrictions and quality of food near the Red Chris Mine may also reduce Tahltan's ability to meet their food and cultural needs. Impacts of the two-week rotational schedule have mixed effects on an individual, their family, and community to meet food security needs and to conduct cultural practices, with increase income supporting some families, trading off with decreased availability for cultural practices to support themselves, their family, and their community. The proposed Block Cave Amendment is not expected to appreciatively alter Tahltan access to the mine area, the rotational schedule, income disparity, or other socio-cultural effects associated with the mining industry. The construction workforce is expected to add approximately 300 jobs for several years at the Red Chris Mine, potentially exacerbating socio-cultural impacts.

Conditions recommended to address concerns noted above:

- 23. Tahltan Human Health Monitoring and Management Plan

Additional bi-lateral commitments to support Tahltan Food Security include:

- Tahltan Way of Life Plan
- Tahltan Food Sovereignty Monitoring Plan

After applying conditions, the proposed Amendment aligns satisfactorily with this Sustainability Criteria.

10. Minimizes and accommodates adverse impacts to Tahltan Values and has Tahltan social, cultural, environmental, community infrastructure and health compensation and adaptive management plans with binding commitments in place to support this requirement.

The existing Red Chris Amendment has a number of known and continuously experienced adverse effects on Tahltan lands and communities, along with benefits for Tahltan members and communities. The Block Cave Amendment will bring some additional effects as discussed in Risk Assessment Summaries 9.4.1.1.1 to

9.4.1.1.9, and will also enhance positive benefits. To try to reduce negative impacts, increase positive impacts, and address, where possible, some existing impacts, we have used the following tools:

- EAC Conditions—these will be legally binding, enforceable under the BC *Environmental Assessment Act*, and initially enforced by EAO. There is future potential under the BC *Environmental Act* for Tahltan to collaboratively administer compliance and enforcement requirements and the province has confirmed to engage in negotiations to this end.
- Existing Permit Conditions (also legally enforceable). During the course of the Environmental Assessment process, TCG and worked with the Ministry of Energy and Mine and Ministry of Environment to proactively update both of their permits to address existing concerns on site. Proactive changes that have been made to address Tahltan concerns that are independent of the Block Cave Amendment include:
  - Strengthened language to require control of contamination at the source (i.e. ‘Source Control’) rather than downstream
  - Strengthened language, requirements, and timelines to address RSA and TIA seepage
  - Requirement for a seepage prevention plan before full inundation of the Northeast Arm of the TIA
  - Increasing the reclamation and closure bond held by the BC Government to account for water treatment requirements at closure.

The above points are added to the existing permits that require environmental monitoring and reporting, as described in Section 4.1.2, and will be overseen collaboratively with BC as directed under the Red Chris Management Agreement.

- Block Cave Permit Conditions (legally enforceable)—Following the potential issuance of an EA Certificate, the major permits regulating the Red Chris Mine will be amended to guide Block Cave development, operations, and closure planning. Though not confirmed until provincial statutory decisions are complete, Tahltan is working to ensure technical concerns not captured in recommended EAC conditions are to be included in subsequent permits.
- Not all issues that need to be addressed with the Red Chris Amendment can be or are desired to be contained in regulatory instruments. The existing IBCA addresses a number of issues of accommodation for impacts, and findings of the Tahltan Risk Assessment have resulted in additional bi-lateral commitments with NRCML that are binding under contract law and include:
  - Tahltan Geotechnical Review of Underground Works
  - Reference Lake Report
  - Tahltan Worker Transition Plan
  - Tailings Storage Facility
  - Tahltan Way of Life Plan
  - Socio-Cultural, Health and Wellness Initiatives and Measures
  - Tahltan Emergency Response Plan

After applying conditions, the proposed Amendment aligns with this Sustainability Criteria.

11. Does not significantly impact Tahltan Values through residual or cumulative effects.

As described in Table 28, the proposed Block Cave Amendment has the potential to have significance residual or cumulative effects. Effects are exacerbated when adding them to the sizeable effects of the existing open pit Red Chris Mine. Risk Assessment summaries in sections 9.4.1.1.1 to 9.4.1.1.9 explain the key areas of concerning residual effects. For any Risk Assessment Factor that may have a significant effect, we developed a corresponding binding obligation to address the effect (see answers to Sustainability Questions 10).

As per Risk Assessment summaries in sections 9.4.1.1.1 and 9.4.1.1.5, significant residual adverse cumulative effects remain for Tahltan Rights and Title and Tahltan Ability to Reclaim and Restore and there is not full alignment with this Sustainability Criteria.

12. Does not significantly impact Tahltan Rights and Title and the exercise of Rights and Title for Tahltan.

We considered effects on Tahltan Rights and Title through analysis of the Block Cave Amendment's contribution to meeting Tahltan Core Priorities across the Tahltan Continuum. We find that the potential negative impacts of the Block Cave Amendment specifically to Tahltan's Rights and Title are not significant. However, when assessed in the context of the existing cumulative impacts to Tahltan Rights and Title, including from the loss of access, the changes to the ability to exercise Tahltan Aboriginal title and governance, and the changes to Tahltan's ability to use, respect and care for the land and resources remain, we find that the Block Cave Amendment will result in significant residual adverse cumulative impacts to Tahltan's Rights and Title. (see 9.4.1.1.1). Positive impacts from the Block Cave Amendment to Tahltan Rights and Title include the increased recognition of Tahltan authority for decision making through the Declaration Act Agreement, ability to participate in the review and oversight of NRCML's implementation of potential future conditions, and the commitment to have consent for any future substantial changes to the Red Chris Mine.

Key conditions developed to address Rights and Title include:

- 8. Tahltan Satisfaction
- 9. "Work With" Condition
- 10. Tahltan Sources and Types of Knowledge
- 11. Tahltan Sustainability Reporting
- Definitions for "Collaborate/Collaboration"; "Work With"; "Tahltan Satisfaction" and "Tahltan Aboriginal Rights"

As per Risk Assessment summaries in sections 9.4.1.1.1, significant residual adverse cumulative effects remain for Tahltan Rights and Title and there is not full alignment with this Sustainability Criteria.

13. Contributes, supports, or assists in creating sustainable social, cultural, environmental, community and economic legacies for Tahltan.

The Block Cave Amendment has a number of potential positive impacts and legacies for Tahltan, described in Section 9.2.1.3. These positive impacts are in addition to those experienced from the current Red Chris Mine, committed in the existing IBCA, and included in the Addendum to the IBCA to address findings of this Tahltan Risk Assessment. Challenges remain for NRCML and Tahltan to tackle the abrupt loss of some of the positive impacts of the Red Chris Mine that will be experienced at closure. Several conditions have been developed to address Red Chris Closure concerns, including:

- 18. Tahltan Future Generations Plan
- 19. Closure Study Report

Tahltan Future Generations Plan includes objectives and success criteria requiring continued engagement and collaboration with communities to plan for and mitigate impacts of closure to social infrastructure and services

Additional bi-lateral commitments to support legacies for Tahltan include:

- Commitments of the existing IBCA
- Tahltan Worker Transition Plan
- Business Opportunities and Transition
- Socio-Cultural Health and Wellness Initiatives and Measures
- Business, Procurement and Contracting Team
- Education, Training and Employment Team

. After applying conditions, the proposed Amendment aligns with this Sustainability Criteria.

## **9.5 STEP 5: ARE FURTHER MITIGATION MEASURES OR TERMS AND CONDITIONS NEEDED FOR THE PROJECT TO ADDRESS OUTSTANDING EFFECTS?**

Responses to Tahltan Risk Assessment Factors and Tahltan Sustainability Criteria, as supported by analyses in sections 9.1-9.3, identify predicted significant effects of the proposed Block Cave Amendment, many of which are most concerning when considering effects as additive to existing effects of the Red Chris Mine. TCG,

NRCML, and BC have worked to address significant predicted effects of the proposed Block Cave Amendment, along with additional effects of concern related to existing operations or as identified by Tahltan members. The following three tools are being recommended to be utilized to address the effects:

- (1) **EAC Amendment Conditions:** The Declaration Act Agreement is clear that if TCG consents to the Block Cave Amendment, this consent may be contingent on certain terms and conditions being included in the Amendment Order. As a primary tool to address these findings of significance, recommended conditions have been developed with the BC EAO. These conditions are listed below in 9.5.1.
- (2) **Recommended Permit Amendments:** Some key issues that are focused on the technicalities of mine infrastructure and management are better addressed through amendments to the Mines Act M240 or Environmental Management Act PE-1051017 permits. Though permits must be issued after any Tahltan consent decision and EAC issuance, Section 9.5.3 describes key changes to permits that are in development to support addressing outcomes of this assessment.
- (3) **Bi-lateral TCG-NRCML Commitments:** Finally, where some key issues are best addressed through bi-lateral commitments between TCG and NRCML, with no involvement from provincial regulators, bi-lateral commitments, to be appended to the existing TCG-NRCML IBCA, have been negotiated and are described in Section 9.5.4.



### 9.5.1 Recommended Mitigation Measures and Conditions Required to Minimize Impacts to Tahltan and Align with Tahltan Core Priorities

As determined in Steps 3 and 4, additional mitigation measures and conditions are necessary to ensure potentially severe impacts are minimized, significant impacts are addressed, the Amendment becomes more aligned with Tahltan Core Priorities, Tahltan Risk Assessment Factors, Tahltan Sustainability Requirements and reduces impacts to Tahltan.

#### 9.5.1.1 List of Recommended EAC Conditions

TCG Lands and EAO reached consensus on recommended conditions on April 17, 2026. The full text of all conditions recommended to be attached to an Environmental Assessment Certificate, should a Certificate be issued, is below.

## Recommended EAC Conditions

### 1. Compliance Verification and Reporting

- 1.1 The Holder must provide to the EAO and TCG any document, data or information requested by the EAO for the purposes of compliance inspection and verification. The Holder must provide any document, data or information requested within the timeframe and in the manner specified by the EAO.
- 1.2 The Holder must submit a report to the attention of the EAO and TCG on the status of compliance with this Amendment at the following times, unless authorized by the EAO:
  - a) At least 30 days prior to the start of Construction;
  - b) On or before April 30 in each year during Construction;
  - c) At least 30 days prior to the start of Operations;
  - d) On or before April 30 in each year of Operations;
  - e) At least 30 days prior to the start of Closure; and
  - f) On or before April 30 in each year after the start of Closure until the end of Closure.

1.3 The reports in subsection 1.2 must be in a form satisfactory to the EAO. The EAO may adjust or extend this reporting requirement by providing written notice to the Holder.

## 2. **Amendment Status Notification**

2.1 The Holder must notify the Compliance and Enforcement Branch of the EAO, and TCG, in writing that the Block Cave Project is in Construction, Operations, Closure and Post-Closure. The notification must be received by the Compliance and Enforcement Branch of the EAO, and TCG, at least 30 days prior to the commencement of Construction, Operations, Closure and Post-Closure.

2.2 The Holder must notify the EAO in writing, within 30 days after the issuance of this Amendment, of the primary contact for the Project and provide the physical address, email address and phone number(s) of the primary contact.

2.3 Should the primary contact for the Project change, the Holder must notify the EAO in writing within 30 days of the change and provide the physical address, e-mail address and phone number(s) of the new primary contact.

## 3. **Compliance Notification**

3.1 The Holder must notify the Compliance and Enforcement Branch of the EAO, and TCG, as soon as practicable, and in any event no more than 72 hours, after the Holder determines that the Holder has, or likely has, failed to comply with this Amendment.

## 4. **Document Review**

4.1 The requirements within subsections 4.2 and 4.3 apply to plans, programs or other documents, and any updates to those plans, programs or other documents, required by Condition 12 in this Amendment.

4.2 The EAO may, within 45 days, or another period if a condition in this Amendment provides otherwise, of receiving a document required by a condition identified in subsection 4.1, Notify the Holder that:

- a) The Holder may implement the actions in the document; and/or
- b) A revised document must be provided in accordance with the EAO's instructions, including any additional consultation required by the EAO.

4.3 If the EAO does not Notify the Holder within the period referred to in subsection 4.2, the Holder may implement the actions in the document, unless the applicable condition identified in subsection 4.1 provides otherwise.

4.4 The requirements within subsections 4.5, 4.6, 4.7, 4.8 and 4.9 apply to plans, programs or other documents, and any updates to those plans, programs or other documents, required by Conditions 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, and 27 in this Amendment.

4.5 The EAO may, within 45 days, or another period if a condition in this Amendment provides otherwise, of receiving a document required by a condition identified in subsection 4.4, Notify the Holder that a revised document must be provided in accordance with the EAO's instructions, including any additional consultation required by the EAO.

4.6 The TCG may, within 45 days, or another period if a condition in this Amendment provides otherwise, of receiving a document required by a condition identified in subsection 4.4:

- a) Review the Holder's document to consider whether:
  - i. The requirements of the relevant condition have been fulfilled;
  - ii. The Holder has made efforts to align the Block Cave Project with applicable Tahltan Sustainability Criteria and Tahltan Core Priorities; and
  - iii. Collaboration with TCG has occurred, where required by a condition;
- b) Consider the Notice provided by the Holder under Condition 8; and
- c) Notify the EAO and the Holder that:
  - i. The document meets Tahltan Satisfaction, or
  - ii. The document does not yet meet Tahltan Satisfaction.

4.7 If the TCG Notifies the EAO and the Holder under subparagraph 4.6(c)(ii):

- a) TCG may engage with the Holder on the document to identify further revisions to the document that could meet Tahltan Satisfaction;
  - b) The EAO will Collaborate with TCG on instructions for further revisions to the document that could meet Tahltan Satisfaction; and
  - c) If the EAO determines that further revisions are required, the EAO will provide instructions to the Holder for further revisions.
- 4.8 If, following completion of the process set out in subsection 4.7, the EAO and TCG disagree about requiring other revisions to the document:
- a) TCG may, within 45 days of Notifying the Holder under subparagraph 4.6(c)(ii), Notify the EAO and the Holder of any outstanding concerns with the document; and
  - b) The EAO and TCG will engage about any outstanding concerns provided under paragraph 4.8(a) and the EAO will, within 45 days of TCG's Notice under paragraph 4.8(a), Notify the Holder that:
    - i. the Holder may implement the actions in the document, with or without required revisions to the document; or
    - ii. the Holder may not implement the actions in the document and the Holder must revise the document in accordance with instructions provided by the EAO.
- 4.9 If the TCG does not Notify the EAO and the Holder within the period referred to in subsection 4.6 or 4.8, or TCG Notifies the EAO and the Holder under subparagraph 4.6(c)(i), the Holder may implement the actions in the document, unless:
- a) The applicable condition identified in subsection 4.4 provides otherwise, or
  - b) Under the requirements within subsections 4.5 and 4.7(c), the Holder may not proceed with implementing the actions in the document.

## 5. Document Implementation

- 5.1 The requirements within subsections 5.2, 5.3 and 5.4 apply to all plans, programs, or other documents required by Condition 12 in this Amendment.
- 5.2 The EAO may require the Holder to make revisions to any document required by a condition identified in subsection 5.1 if the EAO determines that the implementation of the document is not:
- a) meeting one or more objectives set out in the relevant condition of this Amendment or the purpose and objectives set out in the document, as required by paragraph 6.2(a);
  - b) having the effects, set out in the document, that are contemplated or intended; or
  - c) consistent with changes in industry best practices or technology.
- 5.3 The EAO may, within 45 days, or another period if a condition in this Amendment provides otherwise, of receiving a revised document required by a condition identified in subsection 5.1, including a revised document based on subsection 5.2 or paragraph 6.2(h), Notify the Holder that:
- a) The Holder may implement the actions in the revised document; or
  - b) A revised document must be provided in accordance with the EAO's instructions, including any additional consultation required by the EAO.
- 5.4 If the EAO does not Notify the Holder within the period referred to in subsection 5.3, the Holder may implement the actions in the revised document, unless the applicable condition identified in subsection 5.1 provides otherwise.
- 5.5 The requirements within subsections 5.6, 5.7, 5.8, 5.9 and 5.10 apply to all plans, programs, or other documents required by Conditions 14, 17, 18, 21, 22, 23, 24, and 27 in this Amendment.
- 5.6 The EAO may require the Holder to make revisions to any document required by a condition identified in subsection 5.5 if the EAO determines that the implementation of the document is not:
- a) meeting one or more objectives set out in the relevant condition of this Amendment or the purpose and objectives set out in the document, as required by paragraph 6.2(a);
  - b) having the effects, set out in the document, that are contemplated or intended; or
  - c) consistent with changes in industry best practices or technology.

- 5.7 The EAO may, within 45 days, or another period if a condition in this Amendment provides otherwise, of receiving a revised document required by a condition identified in subsection 5.5, including a revised document based on subsection 5.6 or paragraph 6.2(h), Notify the Holder that a revised document must be provided in accordance with the EAO's instructions, including any additional consultation required by the EAO.
- 5.8 The TCG may, in relation to the Holder's implementation of a document required by a condition identified in subsection 5.5, Notify the EAO and the Holder that the Holder's implementation of the document does not yet meet Tahltan Satisfaction.
- 5.9 If the TCG Notifies the EAO and the Holder under subsection 5.8:
- a) TCG may engage with the Holder on the Holder's implementation of the document to identify steps in relation to the Holder's implementation of the condition, or revisions to the document, that could meet Tahltan Satisfaction;
  - b) The EAO will Collaborate with TCG on any steps that may be required in relation to the Holder's implementation of the condition, and any revisions to the document, that could meet Tahltan Satisfaction; and
  - c) The EAO may require the Holder to take steps in relation to the Holder's implementation of the condition, or to make revisions to any document, if the EAO determines that the implementation of the document is not:
    - i. Meeting one of more objectives set out in the relevant condition of this Amendment or the purpose and objectives set out in the document, as required by paragraph 6.2(a);
    - ii. Having the effects, set out in the document, that are contemplated or intended;
    - iii. Mitigating the predicted or estimated effects to Tahltan Core Priorities or Tahltan Sustainability Requirements;
    - iv. Meeting Tahltan Satisfaction, considering any applicable Notice provided under Condition 8; or
    - v. Consistent with changes in industry best practices or technology.
- 5.10 If, following completion of the process set out in subsection 5.9, the EAO and TCG disagree about requiring other revisions to the document or requiring any steps in relation to the Holder's implementation of the condition:
- a) TCG may, within 45 days of providing a Notice under subsection 5.8, Notify the EAO and the Holder of any outstanding concerns with the document; and
  - b) The EAO and TCG will engage about any outstanding concerns provided under paragraph 5.10(a) and the EAO will, within 45 days of TCG's Notice under paragraph 5.10(a), Notify the Holder that:
    - i. The Holder may implement the actions in the document, with or without further required revisions to the document or required steps in relation to the Holder's implementation of the condition; or
    - ii. The Holder may not implement the actions in the document and the Holder must revise the document in accordance with instructions provided by the EAO.

## 6. Document Development

- 6.1 The requirements within this condition apply to all plans or programs, and any updates to those plans or programs, required in this Amendment.
- 6.2 The Holder must ensure that each document includes the following information:
- a) Purpose and objectives of the document;
  - b) Roles and responsibilities of the Holder, Project personnel and any contractors employed for the purposes of implementing the document;
  - c) Names and, if applicable, professional certifications and professional stamps, of those responsible for the preparation of the document;
  - d) Schedule for implementing the actions in the document throughout the relevant project phases;
  - e) How the effectiveness of any mitigation measures will be evaluated including the schedule for evaluating effectiveness;
  - f) How the Holder will implement adaptive management to address effects of the Project if the monitoring conducted under subsection 6.3 shows that those effects:

- i. Are not being mitigated to the extent contemplated in the Application; or
  - ii. Are different than those predicted in the Application;
- g) Schedules and methods for the submission of reporting required under the applicable condition, and the form and content of those reports;
- h) Process and timing for updating the document, including any consultation with parties listed in the condition that would occur in connection with such updates; and
- i) Process and timing for updating the document, including a description of any Collaboration undertaken with TCG.

6.3 The Holder must ensure that if a document includes monitoring requirements, the document includes:

- a) A description of baseline information that will be used to support monitoring of the effectiveness of mitigation;
- b) The methods, location, frequency, timing, duration and, where required, the calibration and/or auditing requirements of monitoring; and
- c) The scope, content and frequency of reporting of the monitoring results.

6.4 If a party is succeeded by another entity or if the responsibilities of a government agency change, the Holder must consult with the new entity or new responsible government agency.

## 7. Consultation

7.1 Where a condition of this Amendment requires the Holder to consult a party or parties regarding the content of a document, the Holder must, to the satisfaction of the EAO:

- a) provide written notice to each such party that:
  - i. includes a draft of the document;
  - ii. invites the party to provide its views on the content of the document; and
  - iii. indicates:
    - A) if a timeframe for providing views to the Holder is specified in the relevant condition of this Amendment, that timeframe; or
    - B) if a timeframe for providing views to the Holder is not specified in the relevant condition of this Amendment, a reasonable period during which the party may submit views to the Holder;
- b) undertake a full and impartial consideration of the views and other information provided by a party;
- c) provide a written explanation to each such party that provided views as to:
  - i. how the views and information provided by the party have been considered and addressed in a revised version of the document; or
  - ii. why the views and information have not been addressed in a revised version of the document;
- d) maintain a record of consultation with each party regarding the document; and
- e) provide a copy of the consultation record to the EAO at the same time the associated document is submitted to the EAO.

## 8. Tahltan Satisfaction

8.1 Where the development of, or an update to, a plan, program, report or other document must meet Tahltan Satisfaction, the Holder must complete the processes set out in subsection 8.3.

8.2 Where the Holder's implementation of a plan, program or other document must meet Tahltan Satisfaction, and the TCG provides a Notice to the EAO and the Holder under subsection 5.6, the Holder must complete the processes set out in subsection 8.4.

8.3 At the time that the Holder is required to complete the development of, or an update to, a plan, report or other document that must meet Tahltan Satisfaction, the Holder must provide a notice to TCG and EAO that:

- a) Describes how the plan, report or document has met or is meeting specific requirements of the relevant condition and will meet Tahltan Satisfaction;
- b) Describes how the plan, report or document contributes to the Holder's efforts to align the Block Cave Project with applicable Tahltan Sustainability Criteria and Tahltan Core Priorities;

- c) If Collaboration with TCG is required by a condition, summarizes outcomes of Collaboration with TCG; and
  - d) Describes how any changes to the plan, report or document requested by TCG were incorporated and provide an explanation for any changes that were not incorporated.
- 8.4 If the TCG provides a Notice to the EAO and the Holder under subsection 5.6, then, within 45 days of receiving that Notice, the Holder must provide a Notice to TCG and EAO that:
- a) Describes how the Holder's implementation is meeting or will meet Tahltan Satisfaction;
  - b) Describes how the Holder's implementation contributes to the Holder's efforts to align the Block Cave Project with applicable Tahltan Sustainability Criteria and Tahltan Core Priorities;
  - c) If Collaboration with TCG is required by a condition, summarizes outcomes of Collaboration with TCG; and
  - d) Describes how any changes to the Holder's implementation requested by TCG will be incorporated and provide an explanation for any changes that will not be incorporated.

## 9. **“Work With” Condition**

- 9.1 Where a Condition identifies the Holder must Work With TCG, the Holder must comply with Condition 9 as initial steps and throughout the development, implementation, and updating of plans, programs, and other documents, and the specific requirements for the Condition prior to seeking Tahltan Satisfaction throughout Construction, Operations, Closure and Post-Closure.
- 9.2 The Holder must consider being a signatory of a Tahltan Knowledge Protocol or other information governance agreements with TCG that are inclusive of the work required to protect Tahltan knowledge, confidential information, and sensitive information.
- 9.3 Where a Condition identifies the Holder must Work With TCG, the Holder will Work With TCG through the Tahltan principle of Kotah (Visiting) to holistically and respectfully seek information and guidance through efficient and respectful processes.

## 10. **Tahltan Sources and Types of Knowledge**

- 10.1 Where the Holder is required to develop, update or implement a plan, report or other document to Tahltan Satisfaction, the sources and types of information that the Holder must consider include:
- a) Tahltan Knowledge, as defined in the Declaration Act Agreement, and Tahltan Core Priorities, as defined in the Tahltan Risk Assessment Report;
  - b) The Tahltan Risk Assessment Report, the Tahltan Risk Assessment Factors, as defined in the Declaration Act Agreement, the Tahltan Sustainability Requirements as defined in the Declaration Act Agreement, and the Tahltan Impact Assessment Policy;
  - c) Tahltan technical knowledge and best management practices; and
  - d) Other Tahltan sources of relevant information that are publicly available or made available to the Holder through programs required by this Certificate, permits or other authorizations for the Project, or other programs implemented by the Holder, TCG, and other governments or other third parties.

## 11. **Tahltan Sustainability Reporting**

- 11.1 The Holder must produce a report describing the Block Cave Project's progress towards alignment with Tahltan's Sustainability Requirements and Tahltan Core Priorities.
- 11.2 The Holder must submit the report to TCG every 3 years from issuance of this Amendment throughout all Project phases.
- a) Upon submission of each report to TCG, the Holder must provide a Notice to the EAO that details:
    - i. Date of submission to TCG; and
    - ii. Any commitments to additional engagement with TCG as per subsection 11.4.
- 11.3 Each report must include at least the following:
- a) Summary of the Block Cave Project's effects as compared to those predicted in the Application;
  - b) Summary of the effectiveness of mitigations as described in the Application or prescribed in Conditions;

- c) An assessment of how the Block Cave Project's plans, programs and any other measures are advancing alignment of the Block Cave Project with each of the Tahltan Sustainability Requirements and Tahltan Core Priorities, or for a specific subset of Tahltan Sustainability Requirements and Tahltan Core Priorities as identified by TCG as per subsection 11.5; and
  - d) Additional recommendations, if any, from applicable Qualified Professionals or Qualified Persons for actions to increase the Block Cave Project's alignment with Tahltan Sustainability Requirements and Core Priorities, and any associated commitments by the Holder for implementation of recommendations.
- 11.4 If the report identifies that the Block Cave Project is not aligned with one or more of the Tahltan Sustainability Requirements and the Tahltan Core Priorities, then the Holder must Collaborate with TCG regarding:
- a) Additional or modified mitigations to mitigate effects; and
  - b) Engagement of a Qualified Professional or Qualified Person by the Holder to reassess and recommend additional or modified measures to improve alignment.
- 11.5 Where the Tahltan Sustainability Requirements and Tahltan Core Priorities are not met, TCG may issue guidance to the Holder regarding TCG expectations for the subsequent report.

## 12. Care and Maintenance Plan

- 12.1 The Holder must retain a Qualified Person with a minimum of 5 years of experience in drafting care and maintenance plans for mining projects in Canada/North America, unless otherwise authorized by the EAO, to develop a Care and Maintenance Plan. The Care and Maintenance Plan must be developed in consultation with TCG and ENV.
- 12.2 The Holder must provide a framework for the Care and Maintenance Plan, developed in consultation with TCG and ENV, to the EAO for review within 90 days of the commencement of Construction, unless otherwise authorized by the EAO.
- 12.3 The Holder must ensure that the framework for the Care and Maintenance Plan includes, at a minimum, the means by which the following will be addressed:
- a) Building maintenance;
  - b) Access management;
  - c) Spill prevention and response for hydrocarbon storage and leaks or other accidental emissions from machinery or equipment;
  - d) Workforce management response, including maintaining Tahltan and regional work force where possible; and
  - e) Maintaining communication with TCG, Tahltan communities, and regional communities and service providers.
- 12.4 The Holder must ensure that the framework for the Care and Maintenance Plan includes identification of which conditions in this Amendment and in the Table of Proponent's Commitments would apply in full, apply in part, or cease to apply during Care and Maintenance, and a description of how the Holder will Collaborate with TCG on the development of the Care and Maintenance Plan.
- 12.5 The Holder must notify the EAO in writing of the date on which the Project enters Care and Maintenance. The notification must be received by the EAO no later than 30 days after Construction or Operations ceased.
- 12.6 The Holder must provide the Care and Maintenance Plan to the EAO for review no later than 90 days after the Project enters a period of Care and Maintenance. The Holder must ensure that the Care and Maintenance Plan includes the means by which the topics listed in subsection 12.3 will be addressed and a description of how each condition in this Amendment and in the Table of Proponent's Commitments will apply in full, apply in part, or cease to apply during Care and Maintenance, and provide a rationale for any conditions proposed to apply in part or cease to apply.
- 12.7 The Holder must implement the plan, and any updates made pursuant to subsection 5.3 or paragraph 6.2(h), throughout Care and Maintenance, under the direction of a Qualified Person retained by the Holder, and to the satisfaction of the EAO.

12.8 To the extent there is a conflict between the Care and Maintenance Plan, as reviewed by the EAO, and the conditions in this Amendment and in the Certificate, the Care and Maintenance Plan applies.

### 13. Public Information

13.1 The Holder must establish a dedicated Project website or an alternative online medium that provides the same or better access to the Project information as a traditional website. The Holder must make the information required in subsection 13.2 available to the public without tracking of users' personal identity or the need for registration, credentials, or payment.

13.2 The Holder must include the following information on the website or alternative online medium:

- a) Copy of the Certificate and all amendments thereto;
- b) A description of the Project and the current Project status;
- c) The date of the last update of the website or alternative online medium;
- d) Contact information for the Holder;
- e) A description of how to submit questions or concerns about the Project to the Holder;
- f) The means by which the Holder will respond to any questions or concerns submitted about the Project;
- g) Current versions of all plans required to be provided to the EAO by the Certificate and all amendments, unless otherwise authorized by the EAO; and
- h) Information on upcoming public engagement activities related to the Project.

13.3 The Holder must establish the website or alternative online medium at least 60 days prior to the planned commencement of Construction. The website or alternative online medium must be maintained throughout Construction, Operations, and Closure and reviewed at least biannually for any necessary updates, unless otherwise authorized by the EAO.

### 14. Air Quality

14.1 The Holder must retain a Qualified Professional with experience monitoring air quality to develop a plan to monitor and manage NO<sub>2</sub>, PM<sub>2.5</sub>, and PM<sub>10</sub> concentrations at the Worker Camp. The plan must be developed in Collaboration with TCG and in consultation with ENV and Northern Health.

14.2 The Holder must provide the plan to the EAO and TCG for review a minimum of 60 days prior to the commencement of Construction, unless otherwise authorized by the EAO.

14.3 The Holder must include at least the following in the plan:

- a) Limitation of the number of emergency generators to be tested concurrently to no more than two generators in a 24 hour period;
- b) A description of how the Holder will monitor PM<sub>2.5</sub> and PM<sub>10</sub> concentrations and passively monitor NO<sub>2</sub> concentrations at the Worker camp;
- c) A description of how results of monitoring conducted for NO<sub>2</sub>, PM<sub>2.5</sub> and PM<sub>10</sub> will be compared to concentrations predicted in the Application; and
- d) A description of the approach to annual comparison of monitoring results against relevant air quality and health objective values, including an assessment of whether additional mitigation measures are required and a recommendation of additional mitigation measures; and
- e) A description of how and when the Holder will implement recommended additional mitigation measures identified under 14.3(d).

14.4 The Holder must implement the plan, and any updates made pursuant to subsection 5.3 or paragraph 6.2.(h), throughout Construction and Operations, unless the EAO and TCG are satisfied with a change to implementation pursuant to subsection 14.5, under the direction of a Qualified Professional retained by the Holder, and to the satisfaction of the EAO and TCG.

14.5 After three consecutive years of monitoring NO<sub>2</sub>, PM<sub>2.5</sub> and PM<sub>10</sub>, the Holder may, in writing, submit a request to the EAO and TCG to reduce air quality monitoring at the Worker camp, subject to the EAO and TCG's satisfaction.

14.6 The Holder must consider Construction phase activities in the implementation of the Air Quality Management Plan, as required under any permits issued under the *Environmental Management Act*.

## 15. Seepage Mitigation Report

- 15.1 The Holder must retain a Qualified Professional to develop a report to evaluate the effectiveness of seepage source control and mitigation measures. The report must be developed in Collaboration with TCG. The report must be provided to the EAO, TCG, MCM and ENV for review a minimum of 6 months prior to placement of Block Cave tailings into the Tailings Impoundment Area.
- 15.2 The Holder must Collaborate with TCG to develop a Terms of Reference to confirm approach to modelling and assessment methods that will inform the report. The Holder must provide the Terms of Reference to the EAO and TCG for review a minimum of 6 months prior to the planned commencement of Operations.
- 15.3 The Holder must ensure that the report includes at least the following:
- a) A description of seepage locations and pathways based on physical and chemical field data;
  - b) A description of how the Holder will verify seepage predictions against those described in the Application;
  - c) Updated seepage predictions for Operations from those in the Application, if applicable, and their predicted uncertainty ranges; and
  - d) An assessment of the effectiveness of current and planned seepage source control and seepage management measures on site.
- 15.4 If the report concludes that:
- a) Updated seepage predictions in Operations are worse than predicted in the Application; and/or
  - b) Seepage monitoring has demonstrated that seepage is worse than predicted in the Application,
- Then the Holder must Work With TCG to ensure the Report also includes:
- c) An updated assessment of the potential effects of seepage on Tahltan Aboriginal Rights; and
  - d) Additional mitigation measures to manage seepage.
- 15.5 Where additional mitigation measures are identified under subparagraph 15.4(d), the Holder must, within 6 months of the report submission, or as otherwise authorized by the EAO, recommend which mitigation measures should be incorporated into plans required under the *Mines Act* or *Environmental Management Act*.
- 15.6 The report must be to the EAO and TCG's satisfaction.

## 16. Closure Streamflow Report

- 16.1 The Holder must retain a Qualified Professional to develop a report based on updated water modelling to evaluate the potential for high streamflow during Closure and Post-Closure, identify potential adverse impacts on fish and aquatic habitat, describe management of any predicted adverse effects to fish and aquatic habitat, and describe management of resulting adverse effects. This report is intended to inform the final Closure Plan that is submitted and implemented pursuant to *Mines Act* permit requirements. The report must be developed in Collaboration with TCG.
- 16.2 The Holder must provide the report to TCG, MCM and EAO at least 5 years prior to the planned commencement of Closure, unless otherwise authorized by the EAO.
- 16.3 The Holder must ensure that the report includes at least the following:
- a) Summary of updates to Closure streamflow predictions, and comparison to the predictions from the Application;
  - b) If the updated Closure streamflow predictions indicate adverse impacts to fish and aquatic habitats, then the Holder must describe additional mitigation measures recommended to be implemented, to address:
    - i. Changes to stream bed morphology;
    - ii. Impacts to fish and aquatic habitat; and
    - iii. Impacts to Tahltan Aboriginal Rights.
  - c) How findings in the report inform Closure and Post-Closure mitigations and monitoring.
- 16.4 The report must be to the satisfaction of the EAO and TCG.

## 17. Kluea Lake Watershed Hydraulic Connectivity Monitoring Plan

- 17.1 The Holder must retain a Qualified Professional to develop a plan to undertake hydrogeologic field investigations and groundwater monitoring between the Underground Mine Area and the Kluea Lake watershed (including Trail Creek and tributaries and the south valley alluvial aquifer system). This plan is intended to inform any water management plans required by any *Mines Act* and/or *Environmental Management Act* permit requirements. The plan must be developed in Collaboration with TCG.
- 17.2 Prior to the development of the plan, the Holder must Collaborate with TCG on study designs for verifying predictions in the Application related to hydraulic connectivity between the Underground Mine Area and Kluea Lake, including methods and timelines, for:
- Groundwater-surface water interaction studies conducted along the western and northern shore of Kluea Lake to identify locations where groundwater is discharging into Kluea Lake;
  - Investigations into the structural geology of the area between the Underground Mine Area and Kluea Lake, focusing on the upper 200 m depth;
  - Updates to the numerical groundwater model, including calibration and independent verification, to predict how the groundwater system and its connection to Kluea Lake will respond during Closure and Post-Closure;
  - An approach to determine the placement of groundwater monitoring wells to confirm water levels and water quality between the Underground Mine Area and Kluea Lake Watershed; and
  - An approach to collaboratively interpreting and verifying model and monitoring results.
- 17.3 Following the process outlined in subsection 17.2, the Holder must provide the plan to TCG and EAO one year prior to the commencement of Operations, unless otherwise authorized by the EAO.
- 17.4 The plan must include studies required as outlined in subsection 17.2 and at least the following:
- A description of how the following will be incorporated into the plan:
    - Results from reports submitted under Condition 20 Ground Stability Reports;
    - Results from surface water and groundwater water quality monitoring in the Kluea Lake Watershed as required by *Environmental Management Act* permits;
    - Results from underground groundwater inflow monitoring; and
    - Results from a surface water and groundwater monitoring system to verify connectivity predictions throughout Operations, Closure and Post-Closure.
  - A description of proposed timelines for implementing the plan, including identification of key milestones to be reported on.
- 17.5 Should, at any time during plan implementation, monitoring results indicate hydraulic connectivity with a risk for potential current or future adverse impacts to the Kluea Lake watershed, then the Holder will Work With TCG to identify the need for additional investigation, monitoring, and mitigation measures to be implemented to avoid impacts, which may include:
- Recommendations for continued or expanded monitoring and updating of predictive models;
  - A re-assessment of predicted impacts to Tahltan Aboriginal Rights;
  - Recommended measures to avoid long-term groundwater and surface water quantity and quality impacts to the Kluea Lake Watershed, to inform future water management plans and related mitigation measures required under any *Mines Act* and/or *Environmental Management Act* permits; and
  - An action plan with committed timelines for the design, implementation, and testing of additional measures to avoid effects due to hydraulic connectivity between the Underground Mine Area and Kluea Lake Watershed.
- 17.6 The Holder must implement the plan and any updates pursuant to subsection 5.3 or paragraph 6.2(h) throughout Operations, Closure and Post-Closure, under the direction of a Qualified Professional retained by the Holder, and to the satisfaction of the EAO and TCG.

## 18. Tahltan Future Generations

- 18.1 The Holder must develop an End Land Use and Social Closure/Tahltan Future Generations Plan to direct and inform reclamation and closure management in the Consent, Communities and Red Chris AOs. This

plan is intended to inform any reclamation and closure plans required by any *Mines Act* or *Environmental Management Act* permit requirements. The plan must be developed in Collaboration with TCG and include collaboratively developed Tahltan vision, management, monitoring and reporting objectives throughout Construction, Operations, Closure and Post-Closure.

18.2 The plan must be provided to TCG and the EAO within one year of the issuance of this Amendment.

18.3 The plan must include at least:

- a) Intent to work towards Tahltan Sustainability Requirements and Tahltan Core Priorities, including strategies to improve alignment;
- b) End land use and social closure objectives to guide on-site, community, and regional closure activities;
- c) Identify strategies, actions, success criteria and timelines to guide implementation and reach objectives;
- d) Describe how the Holder will enable safe access for Tahltan to the Red Chris Mine AOI in Post-Closure; and
- e) Establish a collaborative governance and oversight structure for long term oversight of plan implementation and modification, including but not limited to the following:
  - i. Establishing approaches to Work with TCG through the collaborative governance and oversight structure;
  - ii. Ensuring the plan is reviewed, updated regularly and revised as needed; and
  - iii. Ensuring the plan informs technical planning processes, as required by any permits under the *Mines Act* and/or *Environmental Management Act*.

18.4 The Holder must implement the plan and any updates made pursuant to subsection 5.3 or paragraph 6.2(h) throughout Construction, Operations, and Closure, and to the satisfaction of the EAO and TCG.

## 19. Closure Study Report

19.1 The Holder must develop a report following the completion of the NRCML Closure Alternative Study (Closure Study), as described in Chapter 4 of the Application. The report must be developed in Collaboration with TCG.

19.2 The Holder must provide the report to TCG, MCM, ENV and EAO by December 31, 2028, unless otherwise authorized by the EAO.

19.3 The Holder must Work With TCG to ensure that the report includes at least the following:

- a) Identification of those components and costs of the alternatives identified in the Closure Study that will be incorporated into the next version of any reclamation and closure plans and reclamation liability cost estimate required under the *Mines Act*;
- b) An assessment of how the preferred Closure alternative identified in the Closure Study aligns with each of the Tahltan Sustainability Requirements and Tahltan Core Priorities and end land use and social closure objectives; and
- c) Any preliminary recommendations (e.g., additional information or studies) for mitigation measures to increase alignment with Tahltan Sustainability Requirements and Tahltan Core Priorities and end land use and social closure objectives.

19.4 If the assessment in subsection 19.3(b) indicates that one or more Tahltan Sustainability Requirements and Tahltan Core Priorities and End Land Use and Social Closure Objectives is not met or the reclamation liability cost estimate is insufficient to cover preferred alternative components, then the Holder must:

- a) Initiate additional engagement and additional collaboration studies or reports with TCG to identify additional mitigation measures (e.g., additional information and/or studies), that may improve alignment with the Tahltan Sustainability Requirements, Tahltan Core Priorities, and End Land Use and Social Closure Objectives, to inform future reclamation and closure plans and related mitigation measures under a *Mines Act* or *Environmental Management Act* permit.

19.5 The report must be to the satisfaction of the EAO and TCG.

## 20. Ground Stability Reports

- 20.1 The Holder must retain a Qualified Professional to develop reports on surface ground stability monitoring results and predictions and surface and seismic monitoring of the Block Cave and Kluea Lake Landslide Complex. These reports are intended to complement any ground stability and subsidence monitoring and modelling that is required by any *Mines Act* permit requirements.
- 20.2 The Holder must ensure that each report includes at least the following:
- a) Summary of results of:
    - i. Surface and seismic monitoring of the block cave and subsidence zone; and
    - ii. Surface monitoring of the Kluea Lake Landslide Complex;
  - b) Verification of subsidence assumptions used in the Application against monitoring data;
  - c) Summary of any updates to surface ground stability predictions; and
  - d) If the updated surface ground stability predictions (including signs of landslide acceleration) are greater in magnitude or extent from those predicted in the Application, then the Holder must describe whether additional mitigation measures are warranted to manage adverse effects and how they will be implemented, developed in Collaboration with TCG.
- 20.3 The Holder must provide the reports to TCG, MCM and EAO annually during Operations and every 3 years during Closure and Post-Closure, until a Qualified Professional determines that subsidence has reached the maximum extent and magnitude, unless otherwise authorized by the EAO.
- 20.4 The reports must be to the satisfaction of the EAO and TCG.

## 21. **Offsite Ground Transportation Management Plan**

- 21.1 The Holder must retain a Qualified Person(s) with a minimum of 5 years of experience in managing transportation effects resulting from industrial projects, unless otherwise authorized by the EAO, to develop a plan for managing risks and potential impacts from ground transportation along Highway 37/37A. The plan must be developed in Collaboration with TCG and in consultation with MOTT, NLG, Gitanyow, and TSKLH.
- 21.2 Following development of the plan, the Holder must provide the plan to the EAO and TCG for review by the planned commencement of Construction, unless otherwise authorized by the EAO.
- 21.3 The Holder must ensure that the plan includes at least the following:
- a) How the Holder will monitor Project-related traffic volumes travelling to or from the mine site, and concentrate trucks to the Port of Stewart;
  - b) How the Holder will monitor incidences involving Project-related traffic within the Transportation Corridor;
  - c) Traffic management measures that reduce effects of increased road traffic resulting from the Project;
  - d) How the Holder will support timely and coordinated response to Project-related accidents or incidents, including those resulting in highway closure;
  - e) Measures to increase the Holder's response capacity for Project-related highway emergencies and environmental incidents in preparation for potential increase in vehicle accidents or incidents;
  - f) Use of secured truck covers when transporting concentrate from the mine site to the Port of Stewart;
  - g) How the Holder will record and work to reduce the risk of Project-related vehicle-wildlife interactions;
  - h) How the Holder will engage Tahltan regarding Project-related accident/incident reporting during Construction, Operations, and Closure;
  - i) Threshold values including collision/near-miss rates, wildlife strike rates, and traffic volumes that will trigger additional mitigation measures;
  - j) Commitments to participate in regional and collaborative highway improvement initiatives, including those that are targeted at improving highway safety for all, including vulnerable populations; and
  - k) Mechanisms to report complaints related to Project traffic and incidents.
- 21.4 The Holder must implement the plan and any updates made pursuant to subsection 5.3 or paragraph 6.2(h), throughout Construction and Operations under the direction of a Qualified Person retained by the Holder, and to the satisfaction of the EAO and TCG.

## 22. **Wildlife Management Plan Updates**

- 22.1 The Holder must retain a Qualified Professional to update the existing Wildlife Management Plan required under Commitment C1 in the Certificate. The Holder must Work With TCG on these updates and develop these updates in consultation with the Wildlife Management Advisory Committee. The updates must be to the satisfaction of the EAO and TCG.
- 22.2 The Holder must ensure that the plan is updated to include at least the following:
- a) A metal-uptake monitoring program focused on wildlife health (including, but not limited to waterfowl), with program design and regular reporting, implemented during all phases of the Block Cave Project.
- 22.3 The Holder must notify the EAO, TCG and MCM when these updates are completed and provide a copy of the updates to the plan for review to the EAO, TCG and MCM. The updates to the plan must be implemented throughout all Block Cave Project phases, under the direction of a Qualified Professional retained by the Holder, and to the satisfaction of the EAO and TCG.

### **23. Tahltan Human Health Monitoring and Management Plan**

- 23.1 The Holder must retain a Qualified Person with a minimum of 5 years of experience in managing and monitoring effects to human health from industrial projects, unless otherwise authorized by the EAO, to develop a plan to mitigate and monitor potential effects to Tahltan human health. The plan must be developed in Collaboration with TCG.
- 23.2 Following development of the plan, the Holder must provide the plan to the EAO and TCG for review within one year of the issuance of this Amendment, unless otherwise authorized by the EAO.
- 23.3 The Holder must Work With Tahltan to ensure that the plan includes at least the following:
- a) How the Holder will gather soil, sediment, air, water, and Tahltan foods monitoring data to verify modelled and predicted health effects for the open pit, block cave, and Closure/Post-Closure scenarios in the Site-Wide Human Health Risk Assessment;
  - b) A description of how the Holder will address data gaps, including but not limited to the absence of biophysical baseline information, as identified in the Detailed Health Impact Assessment and the Site-Wide Human Health Risk Assessment;
  - c) Frequency of data sampling and reporting to ensure alignment with environmental media sampling programs;
  - d) Triggers for additional mitigation measures;
  - e) How agreed-upon biophysical health-related recommendations from the Detailed Health Impact Assessment will be implemented;
  - f) A culturally appropriate Tahltan foods monitoring program, to test and verify contaminant levels in harvested country foods potentially influenced by the Project. The monitoring program must include:
    - i. Monitoring of metal parameters of concern concentrations in soil and indicator plant/berry species;
    - ii. A program to test tissues of subsistence food animals (large mammals, small mammals, fish, or birds that are consumed by people) that were killed incidentally or hunted and fished in the Consent Area AOI; and
    - iii. Analysis of results to assess potential impacts on Tahltan member health.
  - g) How the Holder will report out on key outcomes of the plan to Tahltan community members, including frequency and accessibility of reporting.
- 23.4 The Holder must implement the plan and any updates pursuant to subsection 5.3 or paragraph 6.2(h), throughout all Project phases, under the direction of a Qualified Person retained by the Holder, and to the satisfaction of the EAO and TCG.

### **24. Social and Healthcare Services Closure Report**

- 24.1 The Holder must retain a Qualified Person with a minimum of 5 years' relevant experience in the identification and management of the social and/or healthcare service effects associated with the closure of industrial projects, unless otherwise authorized by the EAO, to develop a report on how Closure will result in socioeconomic effects to Tahltan communities and major regional service centres. The report

must be developed in Collaboration with TCG and in consultation with Northern Health and other relevant local services and government organizations.

24.2 The Holder must provide the report to the EAO, TCG, and Northern Health for review no later than 5 years prior to the planned commencement of Closure, unless otherwise authorized by the EAO.

24.3 The Report must include at least the following:

- a) A description of the social and health services the Holder accesses and provides in the region, including but not limited to the following:
  - i. Onsite and offsite medical services and medical support;
  - ii. Emergency services;
  - iii. Social programs and contributions; and
  - iv. Regional transportation contributions (road and airport use and maintenance).

24.4 The Holder must engage in collaborative discussions with TCG, Northern Health and other relevant local services and government organizations regarding opportunities to minimize effects to Tahltan communities and major regional service centres.

24.5 The report must be to the satisfaction of the EAO and TCG.

## 25. **Regional Cumulative Effects Initiatives**

25.1 The Holder must participate in any TCG, provincial, federal, and/or Nisga'a Lisims Government (in respect of the Nass Wildlife Area and Nass Area) cumulative effects initiative, in which industry is invited to participate, related to health or transportation including activities along the Transportation Corridor, unless otherwise authorized by the EAO.

25.2 The Holder must participate in any relevant federal, provincial or Nisga'a Lisims Government initiative, in which industry is invited to participate, related to the regional effects of the use of port facilities in the District of Stewart, including the loading of marine vessels, unless otherwise authorized by the EAO.

## 26. **Tahltan Regional Initiatives**

26.1 The Holder must Work With TCG on any regional cumulative effects assessment or management activities that include the Regional Cumulative Effects AOI, that would be based on both Tahltan cumulative effects and provincial cumulative effects programs, knowledge, and criteria to inform outcomes, and that would be carried out by TCG or jointly by TCG and the Province.

26.2 The Holder must Work With TCG on any regional socio-cultural effects initiatives that are undertaken within the Cumulative Effects AOI by TCG or jointly by TCG and the Province of British Columbia.

## 27. **Community Environmental Reporting Plan**

27.1 The Holder must develop a plan to provide results of environmental monitoring to Tahltan community members. The plan must be developed in Collaboration with TCG.

27.2 Following development of the plan, the Holder must provide the plan to the EAO and TCG for review within twelve months of the issuance of this Amendment, unless otherwise authorized by the EAO.

27.3 The Holder must ensure that the plan includes at least the following:

- a) A reporting schedule that includes, at minimum, bi-annual reporting to Tahltan community members living in Tahltan Territory;
- b) A structure for reporting that communicates:
  - i. Major changes in site operations or development;
  - ii. Results of applicable monitoring programs at the Project including at minimum: air, soil, vegetation, water, fish, and wildlife monitoring, and dam stability; and
  - iii. Any significant environmental incidents, non-compliances, exceedances of relevant guidelines or permit limits, and associated corrective and adaptive management actions;
- c) Description of methods for reporting that are accessible and applicable to Tahltan members (including, as appropriate, community meetings, online platforms, printed materials, and visual

- summaries), and contextualizes scientific data to support comprehension of monitoring results in plain language; and
- d) A schedule for reporting Post-Closure, to be confirmed a minimum of one year prior to Post-Closure.
- 27.4 The Holder must review and update the plan in Collaboration with TCG at minimum every 5 years and update as required.
- 27.5 The Holder must implement the plan and any updates made pursuant to subsection 5.3 or paragraph 6.2(h) throughout Construction, Operations, and Closure, to the satisfaction of the EAO and TCG.

#### **9.5.1.2 Summary of Relevant Permit Conditions**

Recent amendments to the major permits for the Red Chris Mine have strengthened requirements for:

- A conceptual and detailed design for the Rock Storage Area seepage interception system, and initiating construction of the system by January, 2027.
- A Seepage Prevention Plan for the Northeast Arm, prior to inundation beyond 1144masl and full inundation of the Northeast Arm.
- Requirements for monitoring of deep aquifer pumping in the north and south valleys to confirm and avoid pumping impacts on deep aquifer water quality.
- Water Management Plans
- Surface and Groundwater monitoring networks and required reporting
- Trigger Action Response Plan and Seepage Effects Mitigation Plan to address concerning water quality trends in receiving environments

Permit amendments continue to be developed to guide Block Cave activities on site, but are generally expected to address some of the following important topics as identified by TCG/THREAT during permit application review and review of draft permit amendment language:

- For both major permits, requirements for Tahltan Satisfaction and other related oversight commitments
- Requirements for TCG collaboration and satisfaction for key environmental and seepage-related deliverables
- Requirements for water treatment planning
- Stronger requirements for reclamation planning and assessments
- Requirements for key geotechnical management documents before block caving advances
- Increase in reclamation and closure bond to address block cave components

#### **9.5.1.3 Summary of TCG-NRCML Bi-Lateral Commitments**

The TCG-NRCML bi-lateral commitments include additions to the articles within an Addendum to the IBCA and a "Schedule A, Project Commitments".

Proposed commitments in the articles of the Addendum include:

- Updated and expanded collaborative committees, including: a new Education, Training, and Employment Team; a new Business, Procurement and Contracting Team; a strengthened Community, Culture and Wellbeing Team; and renamed Red Chris Advisory Committee; Environmental and Heritage Protection Team; and Tailings and Water Management Task Force.
- Expanded socio-cultural and wellbeing measures and initiatives, including: community wellbeing monitoring; implementation of recommendations of the Health Impact Assessment; expanded employee wellbeing supports; increased support for Tahltan cultural initiatives; and a dedicated Community Wellbeing Fund.
- Environmental commitments to: identify and address new or unexpected environmental effects from the Block Cave Amendment; develop and implement an Adaptive Management and Sustainability Framework; and ensure strong archaeological protections.
- Commitments to develop key documents to Tahltan Satisfaction.

- Commitments to support Tahltan employees and businesses through the transition from open pit to Block Cave operations

Key environmental commitments that were developed to address findings of the TRA are included in Schedule A. The full text of bi-lateral commitments as contained in Schedule A are below.

**IBCA Addendum**  
**SCHEDULE A**  
**PROJECT COMMITMENTS**

1.1 Any capitalized term not defined in this Schedule A or elsewhere in this Agreement has the meaning given to it in the EA Certificate, as amended from time to time.

1.2 Tahltan Geotechnical Review of Underground Works

1.2.1 Newmont must report annually on the geotechnical performance of the Project during all Project Phases.

1.2.2 Newmont and the TCG will establish a bi-lateral Geotechnical Performance Team to receive and review reports prepared by Newmont under Section 1.2.1 with the objectives of (i) providing transparency that underground mine planning, development and active caving is being conducted in a manner that protects worker safety and practicably limits the zone of surface subsidence; and (ii) enabling Tahltan geotechnical input and considerations into key underground mine planning and operational decisions.

1.2.3 Newmont shall develop and provide to the TCG a Terms of Reference (“ToR”) for the Geotechnical Performance Team no later than eight (8) months after the Effective Date, which shall be approved to Tahltan Satisfaction and implemented in accordance with the ToR.

1.2.4 In developing the ToR, Newmont and the TCG will consider the non-exhaustive list of matters that follows:

- (a) the objectives identified above;
- (b) identification of each Party’s technical representatives with expertise in:
  - (i) mine stability design and monitoring programs;
  - (ii) rock mass characterization and structural geology;
  - (iii) geotechnical instrumentation and monitoring;
  - (iv) ground control management and instrumentation programs; and
  - (v) geotechnical risk assessment in mining operations; and
- (c) scheduling of an annual meeting as part of the Annual Red Chris Monitoring Committee Workshop, with additional meetings in consideration of special circumstances, including:
  - (i) significant changes the mine plan;
  - (ii) significant geotechnical incidents or failures;
  - (iii) other significant or material instances/topics as collectively agreed-to by Team members; and
  - (iv) reasonable requests of the TCG Lands Department Representative or Newmont Representative to address material and urgent matters.

1.2.5 The Geotechnical Performance Team will review and discuss comments and recommendations from the TCG’s technical representatives on the collection of technical data, analytical results and geotechnical design, plans and performance provided by Newmont and its consultants on topics that may include:

- (a) mine stability designs and monitoring programs;

- (b) geotechnical baseline data;
  - (c) underground stability;
  - (d) ground control management plans and procedures;
  - (e) caving management plans and procedures; and
  - (f) progression of surface subsidence.
- 1.2.6 The Geotechnical Performance Team will not have any approval or decision-making authority with respect to the development of the Mine and the ToR shall not contain any approval or consent requirements or otherwise fetter Newmont's decision-making authority as operator of the Mine. All geotechnical decisions relating to the design and development of the Mine shall remain with Newmont, as operator of the Mine.
- 1.2.7 The initial meeting of the Geotechnical Performance Team shall occur no later than twelve (12) months after the Effective Date.

### 1.3 Reference Lake Report

- 1.3.1 Newmont must retain a Qualified Professional to develop a report identifying additional reference lakes without mine influences for potential inclusion in Newmont's water quality and aquatic effects monitoring programs for the Project. The report must be developed in Collaboration with the TCG.
- 1.3.2 Newmont must provide the report to TCG, as part of, or ahead of the next AEMP report Newmont under the effluent discharge permit for the Project, following the issuance of the Notice of Decision.
- 1.3.3 Newmont must ensure that the report includes at least the following:
- (a) consideration of the latest existing analyses of potential Project influences and pathways of effect on current reference lakes (Todagin Lake, and Ealue Lake);
  - (b) identification and evaluation of additional lakes without mine influences, located in a comparable area with similar geological and geochemical characteristics to the Project, that could be used as reference lakes; and
  - (c) process for adding additional reference lakes to existing environmental monitoring and reporting programs on site.
- 1.3.4 The report and any additions of reference lakes to the Project's AEMP must meet Tahltan Satisfaction.

### 1.4 Tailings Storage Facility

- 1.4.1 Newmont will Collaborate with the TCG on the development, adoption, or updating of the Terms of Reference for the Independent Tailings Review Board for the Project. Any updates or revisions to the Terms of Reference must include Collaboration by Newmont with the TCG.
- 1.4.2 The Parties agree that the TCG shall be entitled to have one (1) technical representative nominee serve on the Independent Tailings Review Board for the Project, provided that Newmont must first endorse such nominee before such nominee may serve on such board, such endorsement not to be unreasonable withheld.
- 1.4.3 Newmont will ensure that up to two representatives of the TCG Lands Department may attend and participate in the sessions of the Independent Tailings Review Board; such representatives must be a direct employee or THREAT representative of the TCG.
- 1.4.4 Newmont will explore opportunities with the TCG to establish mentorship or learning opportunities for Tahltan Members in connection with the Independent Tailings Review Board.
- 1.4.5 Newmont will ensure that the final versions of all reports, findings, recommendations, and related materials prepared by the Independent Tailings Review Board and provided to Newmont are provided to the TCG Lands Department in their entirety, in the same form they

are provided to Newmont, within fifteen (15) business days following receipt of such materials. Materials prepared for the ITRB may be provided on as-requested basis.

#### 1.5 Tahltan Emergency Response Plan

- 1.5.1 Newmont will, in Collaboration with TCG, and to Tahltan Satisfaction, develop a Tahltan Emergency Response Plan for the Project. Implementation of the plan will be accordance with the Tahltan Emergency Response Plan. The Tahltan Emergency Response Plan will be maintained in an up-to-date condition and followed in the event of an emergency.
- 1.5.2 The Tahltan Emergency Response Plan must be completed within eighteen (18) months of the Effective Date.
- 1.5.3 Newmont will work with the TCG to ensure that the Tahltan Emergency Response Plan will be complementary and coordinated with any Mine Emergency Response Plan required under provincial or federal law to ensure consistency and avoid conflict during implementation.
- 1.5.4 The Tahltan Emergency Response Plan may be appended to or integrated within any provincial or federal Mine Emergency Response Plan to enable seamless implementation and to prevent the creation of duplicative or conflicting documents, should Newmont and the TCG agree.
- 1.5.5 In developing the Tahltan Emergency Response Plan, Newmont will, in Collaboration with the TCG, ensure it includes the following:
  - (a) procedures for the effective and timely management of emergency situations at the Mine with the potential to, or have had realized, impacts to the physical safety of off-site Tahltan Members, including communication, coordination, and command protocols;
  - (b) alignment with any applicable emergency planning frameworks and requirements, including but not limited to:
    - (i) the Provincial Mine Emergency Response Plan;
    - (ii) any Dam Breach Contingency Plans; and
    - (iii) any Regional Emergency Management BC Protocols;
  - (c) inclusion of the emergency preparedness and response components required under the Health, Safety and Reclamation Code for Mines in British Columbia under the Mines Act, including requirements applicable to tailings storage facilities;
  - (d) defined communication requirements and notifications methods between Newmont, the Tahltan Parties, Tahltan Nation and any relevant Governmental Authority, including contact points and reporting timelines; and
  - (e) actions and procedures for advancing recovery and restoration following an incident, including post-incident reporting, community wellness assessment, heritage site assessment, and environmental remediation and reclamation.
- 1.5.6 Newmont will provide reporting to the TCG in combination with and at the same frequency as any reporting requirements under the Mine Emergency Response Plan pursuant to the Health, Safety and Reclamation Code for Mines in British Columbia under the Mines Act or other applicable provincial requirements.

#### 1.6 Tahltan Way of Life Plan

- 1.6.1 Newmont will, in Collaboration with TCG, and to Tahltan Satisfaction, develop a Tahltan Way of Life Plan for the management of effects to Tahltan Way of Life which includes Tahltan traditional uses for current and future generations, and quiet enjoyment of, and access to, the land, on the Consent Area and Red Chris AOI for the Project. Implementation will be in accordance with the Tahltan Way of Life Plan.
- 1.6.2 Newmont must provide the plan to TCG no later than 24 months after the Notice of Decision.
- 1.6.3 Newmont must Work With TCG to develop and implement the plan.
- 1.6.4 In developing the Tahltan Way of Life Plan, Newmont will in Collaboration with TCG, ensure it includes, at a minimum, the following:
  - (a) Shared vision, management, monitoring and reporting objectives;

- (b) Establishment of simple, safe, and consistent access measures and communication mechanisms for Tahltan Members within the Red Chris and Consent Area AOIs;
  - (c) Community grievance and feedback mechanism;
  - (d) Feasible and appropriate mitigation measures to avoid or reduce effects reasonably expected to be caused by the Project to Tahltan Members' quiet enjoyment of the lands and waters, and exercise of rights to maintain way of life and traditional practices, including timing, extent, and location of those mitigation measures;
  - (e) How the effectiveness of mitigation and access measures will be reported as deemed necessary by Newmont and TCG.
- 1.6.5 Newmont must consider outcomes from the development and implementation of the Tahltan Food Sovereignty Plan Condition, into the development and implementation of, and updates to, this plan, in collaboration with TCG.
- 1.6.6 Newmont's development of, and any updates or revisions to, the plan must meet Tahltan Satisfaction.

1.7 Tahltan Food Sovereignty Monitoring Plan

- 1.7.1 Newmont will, in Collaboration with TCG, and to Tahltan Satisfaction, develop a Tahltan Food Sovereignty Monitoring Plan to direct and inform food sovereignty measures for the management of effects to Tahltan way of life which includes Tahltan harvesting for current and future generations, on the Consent Area and Red Chris AOI for the Project. Implementation will be in accordance with the Tahltan Food Sovereignty Monitoring Plan
- 1.7.2 Newmont must provide the plan to the TCG no later than 18 months after the Notice of Decision.
- 1.7.3 Newmont must Work With TCG to develop and implement the plan.
- 1.7.4 In developing the Tahltan Food Sovereignty Monitoring Plan, Newmont will Collaborate with TCG, ensure it includes, at a minimum, the following:
- (a) A shared vision, management, monitoring and reporting objectives throughout all phases of the Project.
  - (b) Engagement with Tahltan Members who are key knowledge holders, facilitated by TCG, to identify and understand within the Consent Area AOI and Red Chris Mine AOI:
    - (i) Identify the factors that influence Tahltan Members' access to the land including avoidance;
    - (ii) Identify harvesting access, success, consumption, and confidence including changes in use patterns over time;
    - (iii) Consider relevant outcomes and findings from the Tahltan Human Health Monitoring and Management plan and the Wildlife Management Plan established under the EAC Certificate;
  - (c) Based on the results of the engagement conducted under paragraph (a), a process to identify feasible and appropriate mitigation measures, to address Project effects.
- 1.7.5 If mitigation measures are identified under paragraph (b), timelines for developing and implementing those measures and/or updates to the plan.
- 1.7.6 A monitoring program for reporting on key outcomes of the plan to TCG, Tahltan members, including frequency and accessibility of reporting.
- 1.7.7 Newmont's development of, and any updates or revisions to, the plan must meet Tahltan Satisfaction.

## 9.6 STEP 6: CONCLUSIONS OF RISK ASSESSMENT

Section 9.6 reviews findings from Sections 9.1 to 9.5 to conclude whether, when the terms and conditions recommended in Section 9.5 are applied, significant effects are predicted to result from the proposed Block Cave Amendment and whether the proposed Block Cave Amendment aligns with Tahltan Core Priorities.



### 9.6.1 Tahltan Core Priorities Across AOIs

Conditions were developed, in part, to improve conditions of Tahltan Core Priorities across AOIs. Once conditions are applied, the conditions of Tahltan Core Priorities improve, though the Red Chris Mine AOI remains “impacted” and the Consent AOI is “degraded” (See Table 29).

**Table 29: Summary of AOI Condition Considering Tahltan Core Priorities and Tahltan Stewardship Plan Management Direction (with conditions)**

Summary of AOI Condition Considering Tahltan Core Priorities and Tahltan Stewardship Plan (TSP) Management Directions (with conditions)					
<b>Healthy</b> Tahltan Core Priorities and TSP Management Directions are being met.					
<b>At Risk</b> Tahltan Core Priorities and TSP Management Directions are being met but can be violated with additional resource development or direct effects are greater than estimated.					
<b>Stressed</b> Tahltan Core Priorities and TSP Management Directions are being stressed but can be restored/maintained through mitigations, conditions, and increased application of TSP management directions for restoring/reclaiming the land.					
<b>Degraded</b> Tahltan Core Priorities and TSP Management Directions are being degraded for one or more associated Tahltan Values but may be restored/maintained through mitigations, conditions, and increased application of TSP management directions for restoring/reclaiming the land					
<b>Impacted</b> Tahltan Core Priorities and TSP Management Directions for one or more associated Tahltan Values are violated and the ability to restore the AOI is either 3 or more generations or irreversible.					
<b>Impacted +</b> For the AOI, Tahltan Core Priorities will experience an additional impact from the proposed Amendment (used only if the characterization without the Amendment is “Impacted” and a substantive additional change is predicted).					
AREA OF INTEREST	Ancient	Historic	Current	Future	Future <i>With the proposed Block Cave Amendment</i>
Regional CE AOI	Healthy	At Risk (due to cumulative effects)	Stressed (due to cumulative effects)	Stressed (due to cumulative effects)	Stressed (no change due to scale of AOI and expected continued cumulative effects)
Consent AOI	Healthy	Healthy	Degraded	Degraded	Degraded

Summary of AOI Condition Considering Tahltan Core Priorities and Tahltan Stewardship Plan (TSP) Management Directions (with conditions)					
			(due to cumulative effects, effects on rights and title, impacts of Red Chris)	(due to cumulative effects, effects on rights and title, impacts of Red Chris)	(No change due to mounting cumulative effects but recognizing increased Tahltan Decision making authority)
Communities AOI	Healthy	At Risk (Recognizing major changes in Tahltan way of life post contact)	Stressed (due to cumulative stressors on communities, including both positive and negative community impacts of Red Chris Mine development)	Degraded (due to cumulative stressors on communities, including both positive and negative community impacts of Red Chris Mine development)	Stressed (No change due to benefits and effects expected to communities as a result of the proposed Amendment, considering conditions)
Highways AOI	Healthy	At Risk (due to development of highways)	Stressed (due to traffic and safety issues on highways)	Stressed (due to cumulative effects of multiple major projects using highway 37)	Stressed (due to cumulative effects of multiple major projects using highway 37)
Klappan River AOI	Healthy	At Risk	Stressed (due to the cumulative development interests, development of Red Chris, and importance of area to Tahltan)	Stressed (due to the cumulative development interests, development of Red Chris, and importance of area to Tahltan)	Stressed (no change – proximity of Red Chris to Klappan and uncertainty related to water management on site maintains rating)
Saddle and Klappan Range AOI	Healthy	At Risk	Stressed (due to resource development interest and importance of area to Tahltan)	Stressed (due to resource development interest and importance of area to Tahltan)	Stressed (due to resource development interest and importance of area to Tahltan)
Red Chris Mine AOI	Healthy	At Risk	Impacted (Due to presence of Red Chris Mine)	Impacted (Due to presence of Red Chris Mine)	Impacted (Due to prolonged impacts of Red Chris mine, but in recognition of conditions applied to address block cave effects)

### 9.6.2 Alignment with Tahltan Risk Assessment Factors and Sustainability Requirements

As directed by the Declaration Act Agreement and the Tahltan Impact Assessment Policy, TRA methodology was designed to ensure potential impacts of the proposed Block Cave Amendment were assessed in isolation and also considered cumulatively across space (e.g. in and across AOIs) and across time (e.g. across the

Tahltan Continuum). Section 9.4. considered assessments carried out from 9.1 to 9.3 to answer Tahltan Risk Assessment Factors and Tahltan Sustainability Requirements, prior to applying recommended conditions. Findings from answering the Tahltan Risk Assessment Factors and Tahltan Sustainability Criteria, prior to applying conditions, are summarized as follows:

- Residual Adverse Effects of the Block Cave Amendment specifically are predicted for: Infrastructure and Services as it relates to traffic impacts; and Closure/Ability to Reclaim and Restore.
- Residual Adverse Cumulative Effects from the Block Cave Amendment are predicted for: Tahltan Rights and Title; Quality and Quantity of Ground and Surface Water; Infrastructure and Services; Proximity and Impacts to Tahltan communities; Closure/Ability to Reclaim and Restore; Alignment with Tahltan Stewardship Plan; and Health and Wellbeing.

Section 9.4 recommended a number of conditions to attach to any Tahltan Notice of Decision providing consent for the Block Cave Amendment. These recommended conditions are documented in Section 9.5. Recommended conditions directly address effects emerging from the TRA in some cases, while in other cases, required monitoring, plan development and implementation, or verification of effects must occur before the TCG Lands Department can be confident that the effects predicted are fully mitigated. Requirements for Tahltan collaboration and Satisfaction have been included in a number of recommended conditions to ensure that Tahltan is directly involved in review and approval of future deliverables meant to confirm predicted effects. After careful consideration of predicted effects of the Block Cave Amendment after application of recommended conditions listed in Section 9.5, and in consideration of uncertainty, we find that:

- Significant residual adverse cumulative effects remain for Tahltan Rights and Title and Tahltan Ability to Reclaim and Restore.

## 10 Risk Assessment Conclusions

### Overview of TRA

This Tahltan Risk Assessment for the proposed Red Chris Block Cave Amendment has assessed the potential effects of NRCML's proposed Block Cave Amendment in accordance with the processes described in the Declaration Act Agreement and TCG's policies and guiding documents. TCG's assessment has been carried out using the methodology described in Section 3.9 of this TRA. Potential effects of the proposed Block Cave Amendment were considered as compared to continuation of the already-operating and already-permitted Red Chris Mine (as described in Section 4).

The potential effects of the Block Cave Amendment on Tahltan Values were assessed holistically across space (Tahltan Areas of Interest) and time (the Tahltan Continuum), in consideration of existing effects of the Red Chris Mine and cumulatively with other potential interacting projects across Tahltan Nation Territory. Considering the Tahltan Risk Assessment Factors and Tahltan Sustainability Requirements, areas of non-alignment between Tahltan Values and the Block Cave Amendment were identified, leading to recommendations for potential conditions for the TCG Board's consideration when deciding whether to consent to the Block Cave Amendment proceeding.

The Red Chris Mine is an existing, operating mine that has a wide range of positive and negative effects on Tahltan members, families, communities, lands, waters, resources and Tahltan Rights and Title. With the holistic approach required by the Tahltan Impact Assessment Policy, the potential effects of the proposed Block Cave Amendment were considered throughout the TRA specifically and as additive to existing effects from the Red Chris Mine and other interacting projects within Tahltan Territory. Assessment of the effects to AOs and Core Priorities, alignment with the Tahltan Stewardship Plan, Tahltan Risk Assessment Factors and Tahltan Sustainability Requirements were all completed considering Block Cave Amendment effects, as additional to those already experienced by Tahltan from the existing Red Chris Mine and other projects in the Territory, as required under the Tahltan Impact Assessment Policy. Subsequently, potential conditions were identified and recommended to the TCG Board for consideration, to help address the potential positive and negative effects of the proposed Block Cave Amendment itself, as well as existing and predicted effects of the existing Red Chris Mine that would combine with the positive and negative effects of the proposed Block Cave Amendment.

The existing condition of Tahltan AOs, considering the operating Red Chris Mine and multiple other influences on Tahltan Core Priorities, are reported for each AOI in Section 9.1. Potential effects of the Block Cave Amendment are summarized in Section 9.2.1. Characterization of the Block Cave Amendment's predicted effects for each Tahltan Value across AOs, including negative and positive effects and taking into

account NRCML's proposed mitigations are reported in Section 9.3.2. The characterizations carried out per Tahltan Value were then holistically considered to inform the effects on each Core Priority and summarized for each AOI in Section 9.3.2. Section 9.4 contains TCG's consideration of the Tahltan Risk Assessment Requirements and Tahltan Sustainability Criteria, developed based on analysis carried out in Sections 9.1 – 9.3.

Where non-alignment was found with Tahltan Risk Assessment Factors and Tahltan Sustainability Criteria, potential conditions were developed for inclusion in any EAC and related permits issued for the Block Cave Amendment, and additional bilateral commitments were identified for development between TCG and NRCML, as listed in Section 9.5. Applying the measures and conditions described in Section 9.5 increases alignment with most, but not all Tahltan Sustainability Requirements, as reported in Section 9.6 and below.

As required under section 7.49 of the Declaration Act Agreement, TCG has worked with the EAO to achieve consensus on the assessments contained in this TRA and in the EAO's Assessment Report.

### **Summary of Findings**

The Tahltan Risk Assessment has identified the AOIs where potential effects from the Block Cave Amendment may occur. For each AOI, the potential severity of negative effects and positive effects were also considered in relation to Tahltan Core Priorities. Effects of the Block Cave Amendment to Tahltan Core Priorities, prior to applying conditions, were primarily identified within the Red Chris, Communities, Highways, and Consent Area AOIs (see Section 9.3.2).

Table 29 summarizes the predicted conditions of AOIs after the application of all mitigations and recommended conditions. Outside of the Red Chris Mine AOI and Consent AOI, the AOIs were assessed as Stressed or At Risk considering potential effects from the Amendment combined with resource development currently and into the future where Tahltan Core Priorities and TSP Management Directions are being stressed, but are expected to be restored/maintained through mitigations, conditions, and increased application of TSP management directions for restoring and reclaiming the land. The assessment status for the Red Chris and Consent AOIs, without any conditions being applied, are Impacted or Impacted+ from the potential effects of the Block Cave Amendment for current and future conditions when considering the impact of the Block Cave Amendment (Table 27).

The effects of the proposed Block Cave Amendment as assessed in Sections 9.1-9.3 were combined to consider alignment with the Tahltan Risk Assessment Factors and Tahltan Sustainability Requirements. Whether due to the specific effects of the Block Cave Amendment, or when considering the effects of the Block Cave Amendment as additive to the existing conditions in the AOIs, the outstanding issues of concern that emerged from consideration of the Block Cave Amendment's alignment with the Tahltan Risk Assessment Factors were:

- Impacts to Tahltan Rights and Title
- Quality and quantity of ground water and surface water
- Infrastructure and Community Services
- Proximity and Impacts to Tahltan Communities
- Closure/Ability to Reclaim and Restore/Permanent Effects
- Quality and confidence of Baseline Information
- Alignment with the Tahltan Stewardship Plan
- Tahltan Health and Wellbeing
- Economic Impact, Employment, and Training

The Block Cave Amendment is also aligned with many Tahltan Risk Assessment Factors. Positive alignment is driven largely by the ongoing collaborative management of the Red Chris Mine with Tahltan as per the existing IBCA, the employment, training, and economic benefits of the Red Chris Mine, the continued community and regional contributions made by NRCML, and the continued commitment to environmental management, adaptive management, monitoring, and research at the Red Chris Mine alongside TCG and THREAT.

After applying recommended EAC conditions, predicted conditions of AOIs improve, but the Red Chris Mine AOI and Consent AOIs continue to be assessed as Degraded and Impacted, respectively, now and into the

future. When assessing alignment with Tahltan Sustainability Criteria, *before applying* the measures and conditions identified in Section 9.5, many criteria were partially, but not fully aligned (See Section 9.4.2). Full alignment with Criteria 1 has been achieved due to the recognition of Tahltan decision making authority relating to the Red Chris Mine through the Declaration Act Agreement, including for future “Substantial Changes” proposed for the mine. Alignment with Criteria 13 is also strong due to the economic, employment, and training benefits of the Red Chris Mine, and the expected expansion of benefits accompanying the proposed Block Cave Amendment. Prior to applying the measures and conditions identified in Section 9.5, misalignment was found for Sustainability Criteria 6, 7, 8, and 12 due to the existing and predicted effects to Tahltan lands, waters, and Rights and Title from the existing Red Chris Mine and proposed Block Cave Amendment, as well as the perpetual water treatment requirements and inability to reclaim and restore the site.

Alignment with the Tahltan Risk Assessment Factors and Tahltan Sustainability Requirements improves when applying recommended EAC Conditions listed in section 9.5.1.1 and bi-lateral commitments (see section 9.5.1.3). Key EAC Conditions and bi-lateral commitments that improve alignment include: requiring ongoing monitoring and verification of effects and mitigations if effects are worse than predicted; enhanced engagement and mitigations with TCG and Tahltan communities to address adverse socio-economic, socio-cultural, and wellbeing impacts; actions to continually improve alignment with Tahltan Sustainability Requirements and Core Priorities; and mechanisms for Tahltan collaboration and satisfaction. Applying the conditions recommended in section 9.5.1.1 will not immediately resolve all effects of concern, particularly those related to water quality and seepage on site. In addition, EAC conditions will take time to improve alignment with Tahltan Risk Assessment Factors and Tahltan Sustainability Requirements through implementation. Recommended EAC conditions were developed to ensure that regular measurement of effectiveness and reporting must occur, and if measures are not effective, additional mitigations must be developed in collaboration with Tahltan. Recommended condition #11 requires that alignment of the Red Chris Mine with Tahltan Sustainability Requirements and Core Priorities must be assessed and reported to TCG every three years to ensure alignment continues to improve over time. All key recommended EAC conditions to address effects of concern to Tahltan also incorporate the need for documents to be developed and conditions to be implemented to Tahltan’s satisfaction. This supports ongoing Tahltan oversight of operations at the Red Chris Mine and implementation of EAC conditions and NRCML bi-lateral commitments to ensure alignment with Tahltan Sustainability Criteria continues to improve.

When considering the application of recommended EAC conditions, NRCML mitigations, the NRCML bi-lateral commitments and the overall benefits and effects of the proposed Block Cave Amendment, as concluded in Section 9.6, two outstanding issues with Tahltan Sustainability Requirements remain:

1. A number of Tahltan Risk Assessment Factors and Tahltan Sustainability Requirements address potential impacts on Tahltan Rights and Title. Tahltan Sustainability Requirement 12 requires TCG to consider whether the Amendment, “Does not significantly impact Tahltan Title and Rights and the exercise of Title and Rights for Tahltan.” As summarized in Section 9.2.1.4, the original Red Chris Mine approvals had a significant impact on Tahltan Rights and Title. The consequences of the original Red Chris approval continue to affect Tahltan’s ability to exercise their Rights and Title and the environmental effects from the existing mine continue to worsen. Though the proposed Block Cave Amendment is contemplated to operate for an expected 12 years, many of the effects of the Red Chris Mine, including with the Block Cave Amendment, will be permanent. Existing accommodations to Tahltan for impacts from the Red Chris Mine are not sufficient to address the realized impacts of the existing mine, and not sufficient to address the predicted future impacts of block cave development.
2. The existing closure plan for the Red Chris Mine requires water management in perpetuity, and even then, water quality objectives are predicted to be exceeded. Though EAC conditions were developed and are recommended to ensure current studies to improve the closure plan are advanced in collaboration with Tahltan, uncertainty remains high in terms of how the site can be closed and whether Tahltan Sustainability Criteria #8 (which requires TCG to consider whether water treatment in perpetuity will be required) can ever be met. The long-term risk and uncertainty for Tahltan as to the eventual closure of the Red Chris Mine, and its environmental and legacy of impacts to Tahltan Territory and communities, remain an unmitigated impact to Tahltan.

Based on the findings set out in this Tahltan Risk Assessment and summarized in Section 9.6, TCG Lands Department has concluded that, after the application of proposed EAC commitments and NRCML bi-lateral measures identified in Section 9.5, and the overall benefits and effects of the proposed Amendment, significant

residual adverse cumulative effects from the Block Cave Amendment to Tahltan Rights and Title and Tahltan Ability to Reclaim and Restore remain. These predicted effects trigger the Crown's duty to accommodate and, if the Amendment is approved, must be addressed by the relevant Crown governments through appropriate accommodation measures.

In addition to the recommended measures and conditions listed in Section 9.5, the Lands Director has identified the following additional measures he considers necessary to address the remaining potential adverse effects of the Amendment:

- The RCMA requires updating to both enhance existing processes and establish new, shared, coordinated management structures for:
  - compliance and enforcement of project conditions and any additional Tahltan conditions identified in the TCG Notice of Decision;
  - regulatory oversight and where required, the improved performance, of key project components such as the Tailings Management Storage Facility and Mine Rock Storage Area under a range of provincial authorizations;
  - adaptive management, environmental performance and effective verification monitoring with clear reporting requirements for the Red Chris Monitoring Committee (RCMC) to TCG and the Province for the life of mine and post-closure;
  - improvements in relation to joint compliance and enforcement mechanisms; and
  - future Tahltan decision making in relation to the Red Chris Mine, including regulatory authorizations.
- Reaching consensus with the Major Mines Office on the conditions to be included in the Major Mine Permit for the Amendment;
- A secured reclamation liability amount (bond) for the Amendment that reflects a long-term, multi-generational approach grounded in Tahltan values and priorities, and aligns with the Province's risk-based Major Mines Reclamation Security Policy;
- Ensuring the EAO Compliance and Enforcement Branch is committed to working with Tahltan to set out protocols for the enforcement of any Tahltan conditions included in the Environmental Assessment Certificate for the Block Cave Amendment.

To date, the Province has committed to (see Appendix A):

- Advance reconciliation negotiations as described in the letter to TCG from Acting Assistant Deputy Minister Danielle Smyth (EAO) and Assistant Deputy Minister Tania Demchuk (MCM) dated April 27, 2026;
- Reinvigorate and update the RCMA as described in the letter to TCG from Acting Assistant Deputy Minister Danielle Smyth (EAO) and Assistant Deputy Minister Tania Demchuk (MCM) dated April 27, 2026;
- Work with Tahltan to discuss the application of the Reclamation Security Policy to the Red Chris Mine, as described in the letter to TCG from Acting Assistant Deputy Minister Danielle Smyth (EAO) and Assistant Deputy Minister Tania Demchuk (MCM) dated April 27, 2026;
- Work with TCG towards a Compliance and Enforcement Agreement under the EA Act as set out in the letter from the Executive Director, Compliance and Enforcement to the TCG Lands and Regulatory Affairs Director on April 24, 2026;
- Recommend specific conditions in the draft Permit M-240 for the Amendment, as set out in a letter from the Director (Technical Operations) of the Major Mines Office to the TCG Lands and Regulatory Affairs Director on April 27, 2026.

As of the date of this TRA, TCG Lands Department and the Province are actively negotiating several government-to-government agreements including a Foundation Agreement, which includes a fiscal element, and a Land Use Planning process agreement. Completion of these agreements will be important to help address the residual adverse cumulative effects identified in this TRA.

The additional measures identified above are not included as conditions in the draft EA Certificate. Although the EAO and TCG reached consensus on these measures being out of scope of the Province's assessment of the Block Cave Amendment, both the conditions contained in the draft EA Certificate and the additional conditions identified by the Lands Director are considered necessary by the TCG Lands Department to address the potential residual adverse cumulative effects from the Block Cave Amendment on Tahltan's Rights and Title and Tahltan Ability to Reclaim and Restore.

TCG has concluded that, if the Amendment is subject to the potential mitigation measures, conditions, and accommodation measures identified in this TRA, including any additional measures considered necessary by the TCG Board such as those listed above, the potential adverse effects of the Amendment could be adequately addressed.

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## **APPENDIX A: Letters to TCG Leadership**



File: 30200-25/ RCPORP 05 06

Reference: 420453

April 24, 2026

**SENT VIA EMAIL**

Connor Pritty  
Lands Director  
Tahltan Central Government  
Box 69  
Tat'ah (Dease Lake), BC V0C 1L0  
[LandsDirector@tahltan.org](mailto:LandsDirector@tahltan.org)

Dear Connor Pritty:

I am writing regarding recent discussions between the Environmental Assessment Office (EAO) and Tahltan Central Government (TCG) regarding exploring collaborative approaches to post-decision Compliance and Enforcement (C&E) activities for the Red Chris Porphyry Copper-Gold Mine (Red Chris) Block Cave Amendment, should TCG consent to the Block Cave Amendment and an Amendment Order be issued.

The *Environmental Assessment Act* and the [Declaration Act Decision-Making Agreement for Red Chris Porphyry Copper-Gold Mine Project](#) allow for both the EAO and TCG to propose certain terms and conditions to be included in the draft Amendment Order to inform our respective decision makers. I have been advised by the EAO Project Leads that your TCG team and the EAO are currently working through the final stages of condition development in preparation for referral to the decision makers.

I wish to affirm that, where proposed conditions require both the TCG and the EAO to be satisfied with how conditions are implemented, the C&E Branch of the EAO is committed to the development of a government-to-government agreement to inform C&E, and will prioritize this work following the decision(s) on the Environmental Assessment Certificate with a shared goal of having the agreement within 18 months of the TCG Notice of Decision being provided to the EAO. More specifically, the C&E Branch is committed to working with you to resolve circumstances where the parties are not aligned on satisfaction.

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Moreover, draft TCG conditions that contemplate the TCG notifying the EAO of potential Holder non-compliance or other related matters could be articulated in an agreement to ensure our mutual understanding of administrative or process steps. The agreement could also include identifying TCG interests regarding participation in C&E activities and opportunities for the collaborative enforcement of certificate conditions. The C&E Branch is committed to engaging with the TCG should the situation arise where TCG provides a notice of non-satisfaction to the EAO prior to entering into a potential agreement, with this purpose of this engagement being the identification of C&E activities to address TCG's notice of non-satisfaction.

I also acknowledge that the Province and TCG are parties to the Red Chris Management Agreement (RCMA), which guides TCG and the Province's shared processes for permitting and post-authorization oversight. The EAO Compliance & Enforcement Branch is committed to engaging with TCG on how the RCMA may be reinvigorated to reflect our ongoing and evolving relationship. It is my understanding that TCG and the EAO are also working closely with the Major Mines Office with respect to permitting for the Block Cave Amendment. The EAO is committed to ensure that a C&E agreement between the Compliance and Enforcement Branch of the EAO and TCG is informed by the roles and responsibilities of other relevant provincial permitting agencies' C&E departments to ensure that EAO and TCG-specific post-decision C&E activities and responsibilities are clearly understood by both parties.

We look forward to initiating discussions on a C&E agreement post provincial and TCG decisions, should an Amendment be issued for the Block Cave Amendment.

Sincerely,



Ben York  
Executive Director, Compliance and Enforcement

cc: Tracy James, Executive Project Director  
Environmental Assessment Office  
[Tracy.James@gov.bc.ca](mailto:Tracy.James@gov.bc.ca)

David Grace, Project Assessment Director  
Environmental Assessment Office  
[David.Grace@gov.bc.ca](mailto:David.Grace@gov.bc.ca)

Jessica Warner, Project Assessment Director  
Environmental Assessment Office  
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Brady Nelles, Executive Director, Compliance and Environmental Enforcement  
Environmental Protection Division  
[Brady.Nelles@gov.bc.ca](mailto:Brady.Nelles@gov.bc.ca)

Allie Glavina, Executive Director, Regulatory Management and Enforcement  
Mines Health Safety and Enforcement Division  
[Alexandra.Glavina@gov.bc.ca](mailto:Alexandra.Glavina@gov.bc.ca)



April 27, 2026

Permit No.: M-240

Ref: 150521

Connor Pritty, Director, Lands and Regulatory Affairs  
Tahltan Central Government  
landsdirector@tahltan.org

Dear Connor:

**Re: Permit Drafting for Block Cave Project, RED CHRIS MINE (M-240)**

---

The Red Chris Block Cave Project is currently advancing through two parallel regulatory processes: Environmental Assessment (EA) and permitting. As the parallel processes advance, staff from the Ministry of Mining and Critical Minerals (MCM) Major Mines Office (MMO) and the Tahltan Heritage Resources Environmental Assessment Team (THREAT) have worked collaboratively to identify and address key technical issues.

To affirm our shared understanding that key technical risks and core priorities will be addressed by MMO through permitting, I am writing to convey my intent to recommend to the Statutory Decision Maker (SDM) draft *Mines Act* permit conditions for the following issues, uncertainties, and risks:

**Alignment with Tahltan Satisfaction**

The draft permit includes conditions that would require the development and implementation of key plans to the satisfaction of the Tahltan Central Government (TCG) including the Surface Water and Groundwater Management Plan, Northeast Valley Tailings Storage Facility (TSF) Seepage Prevention Plan, Metal Uptake Monitoring, Wildlife Management Plan, and Reclamation and Closure Plan. Where Tahltan Satisfaction is not achieved, the draft permit includes requirements for the Permittee to provide documentation of engagement, incorporation of requested changes, and a clear pathway to resolve outstanding issues.

**Block Cave Mine Operations**

The draft M-240 permit will include conditions that would limit block cave operations until the following documents are submitted and approved by the Chief Permitting Officer:

- updated cave and subsidence model report;

- updated Cave Management Plan; and
- updated Ground Control Management Plan.

When the plans are submitted, MMO is committed to working with TCG following the permitting and compliance (Sections 5 and 6) commitments under the Red Chris Management Agreement (RCMA) as well as using the Joint Agreement Implementation Team regular meetings for discussion. Through implementation of a consultative process that aligns with the RCMA, TCG will have the opportunity to share information and feedback with MMO and Newmont. The outcomes of the review process, including any revisions to the plans made by Newmont and their QPs and TCG's views and assessment of impacts, if any, will be used to inform the approval decision-making by the Chief Permitting Officer.

#### Seepage Management

The draft M-240 permit will include seepage prevention and mitigation measures consistent with Environmental Assessment draft Conditions 15 and 17, including:

- limitation on the placement of tailings in the Northeast Valley until a Northeast Valley TSF Seepage Prevention Plan is approved by the Chief Permitting Officer; and
- monitoring of water inflow into the underground block cave to inform the assessment of hydraulic connectivity to Kluea Lake.

#### Tahltan Future Generations

The draft M-240 permit will include reclamation conditions consistent with Environmental Assessment draft Conditions 18 and 19, including:

- alignment of the End Land Use Plan with the End Land Use and Social Closure/Tahltan Future Generations Plan required in the draft #M05-02 conditions;
- requirement for consideration of the preferred alternatives from the Closure Alternative Study in the next reclamation and closure plan update;
- reclamation research and monitoring programs developed collaboratively with TCG; and
- an updated Reclamation and Closure Plan developed collaboratively with TCG.

#### Reclamation Security

The draft M-240 permit will include a recommended reclamation security, including payment schedule, that ensures bonding remains ahead of estimated reclamation liability, consistent with our shared expectations. The draft M-240 permit will include the Exploration Incentive Security (EIS) as a form of security in consideration of Newmont's eligibility under the *Major Mines Reclamation*

*Security Policy (Interim)*. MMO is committed to scheduling a meeting with the SDM for you to share Tahltan's views on the EIS.

Closing

By including these conditions in the draft Permit M-240, the recommendations to the SDM aim to reduce regulatory duplication, uphold Tahltan priorities, and provide confidence that environmental and cultural values will be protected throughout the life of the Red Chris Block Cave Project. MMO appreciates THREAT's efforts towards collaborative permit drafting over the last two months and looks forward to our continued collaboration.

Sincerely,



Kelsey Norlund, Ph.D., P.Ge.  
Director, Technical Operations  
Major Mines Office

cc: Magda Kingsley, Project Director, MMO  
Anna Osborne, THREAT  
Sean Shaw, Executive Director, MMO  
Neil Bailey, Section Head, ENV  
Jeanien Carmody-Fellows, Director, ENV  
Jessica Warner, Project Assessment Director, EAO  
David Grace, Project Assessment Director, EAO  
Tracy James, Executive Project Director, EAO



File: ENVA-30200-20/RCPORP-04-02

Reference: 420438

April 27, 2026

**SENT VIA EMAIL**

Connor Pritty  
Lands and Regulatory Affairs Director  
Tahltan Central Government  
Box 69  
Tat'l'ah (Dease Lake) BC V0C 1L0  
[Landsdirector@Tahltan.org](mailto:Landsdirector@Tahltan.org)

**Re: Advancing Our Shared Commitments in relation to the Red Chris Block Cave Project**

Dear Connor Pritty:

As we proceed through the final phase of the Environmental Assessment (EA) process to decide whether the Block Cave Project amendment (Amendment) to the Red Chris Mine Environmental Assessment Certificate (EAC) should be approved, we are writing in response to your April 7, 2026 letter to confirm the Province's strong commitment to collaborative approaches with Tahltan Central Government (TCG) on regulatory oversight, should the Block Cave Project proceed.

We appreciate you communicating the topics arising from the Tahltan Risk Assessment that may require further discussion with the Province. We recognize that these topics are important considerations in TCG's consent decision process for the Red Chris Block Cave Project, and this letter affirms the Province's ongoing commitments to advancing these matters together with TCG.

Consensus Conditions for the Proposed Amendment

We understand that the EAO and TCG reached consensus on the proposed EAC conditions for the Red Chris Block Cave Project and these conditions are being recommended to our respective decision makers to inform the TCG Board's and the Province's decisions.

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We appreciate the substantial work by our respective technical teams to collaboratively draft the EAC conditions, to provide mitigation measures for effects of the mine on environmental, social, cultural, economic, health and Tahltan's interests and values.

Should the Province consider any changes to the consensus conditions as proposed, Provincial leadership would discuss their considerations with TCG leadership prior to making their decision on whether to issue the Amendment.

### Reconciliation Negotiations

The Province views reconciliation agreements as an important tool for advancing shared priorities, and we remain committed to government-to-government negotiations with Tahltan. Our teams are working on an expedited timeline and negotiations are intended to explore opportunities to advance a broad reconciliation and recognition pathway and a long-term partnership for sustainable development including mining in Tahltan Territory. Our ongoing Foundation Agreement negotiations include approaches to recognition, modernized government-to-government decision making and stewardship, Tahltan social and cultural prosperity (Ka'a jani asit'in).

### Government-to-Government Compliance Oversight and Co-Management of Red Chris

The Province and TCG are parties to the Tahltan – BC Government-to-Government Red Chris Mine Management Agreement (RCMA) that has guided our shared processes for permitting and post-authorization oversight for nearly a decade. In consideration of how our relationship has evolved, including work undertaken pursuant to the Declaration Act Agreement, we are also supportive of your request that we reinvigorate and update the RCMA.

The Province commits to entering into negotiations that would seek to enhance existing processes, and to establish, where needed, new, shared, coordinated management structures for:

- Compliance and enforcement of EAC conditions and Tahltan consent conditions that includes the commitments set out in the letter from the Executive Director, Compliance and Enforcement to the TCG Lands and Regulatory Affairs Director on April 24, 2026 (Appendix B: EAO Compliance and Enforcement Letter);
- Compliance and enforcement oversight of key project components such as the Tailings Management Storage Facility and Mine Rock Storage Area;
- Adaptive management, environmental performance and effective verification monitoring for the life of mine and post-closure, and the reporting requirements for the Red Chris Monitoring Committee; and,

- Efficient regulatory review processes designed to increase the likelihood of consensus recommendations to decision-makers.

We note that, in the RCMA, the Parties agree that Tahltan will have an ongoing active and central role in EA certificate and permit compliance monitoring of the Mine. The Province proposes that, as part of the above-noted topics for the RCMA update, we discuss TCG interests regarding what a compliance and enforcement agreement under the *Environmental Assessment Act* could offer in relation to the Red Chris Mine.

The Province wishes to be transparent that the scoping phase of the negotiations will determine whether further mandates are required to negotiate aspects of the updates to the RCMA. Additionally, the Province acknowledges the significant potential interactions and overlaps of RCMA revitalization with other in-progress negotiations such as the Foundation Agreement and the anticipated Eskay Creek co-management agreement. This important work needs to advance with consideration of our governments' capacity. We believe that it is in our mutual interest to find efficiencies in both the negotiation and the implementation of any agreements, including opportunities to avoid duplication across agreements and to streamline our approach, and we request to explore this in the early stages of negotiation scoping.

#### Reclamation Liability and Reclamation Security

The Province acknowledges Tahltan's goal of a secured reclamation liability amount (Bond) that reflects a long-term, multi-generational approach that is informed by Tahltan values and priorities as well as the risk-based framework of the Province's Major Mines Reclamation Security Policy (Security Policy). The Province's intent is to apply the Security Policy in a fair and consistent manner to all major mines in the province, and to rely on the policy to assure First Nations and the public that the Province holds adequate funds to address reclamation liabilities before those liabilities are created.

While Newmont has applied for the Exploration Incentive Security, which enables eligible permittees to apply for a deferred security payment schedule, the amount and timing of reclamation security required on any specific mine is a decision made by a statutory decision maker under the *Mines Act*. For Red Chris, this decision will be informed by the Security Policy and Tahltan's values which have been raised throughout the permitting process.

We note that the reclamation liabilities for Red Chris will be reviewed regularly throughout the life of the mine and reviews will be conducted with input from TCG. As an outcome of those reviews, it is common that the Chief Permitting Officer (CPO) amends security amounts as needed to reflect changing conditions which may include cost uncertainty over time, updates to provincial policy and legislation, and,

with respect to mines in Tahltan territory, consideration of Tahltan values. The matter of financial security will be a live topic throughout the entire life of the mine, and there will be ample opportunity to continue discussions on this topic on a regular and ongoing basis.

The provincial representative for all matters in relation to reclamation liability and reclamation security is Lowell Constable, Chief Permitting Officer, Ministry of Mining and Critical Minerals (MCM), [Lowell.Constable@gov.bc.ca](mailto:Lowell.Constable@gov.bc.ca), and he is happy to meet and discuss the path forward on this topic at your convenience.

### Permitting

We appreciate the substantial work by our respective technical teams throughout the application review process to develop a shared understanding of the key technical risks arising from the proposed Block Cave project. We understand that our teams have also worked collaboratively through the co-drafting process to find consensus on the conditions required to mitigate those risks in the draft *Mines Act* and *Environmental Management Act* permits. The drafting process is still underway and our teams have committed to discussing and seeking to address any remaining areas of non-consensus ahead of referral to the statutory decision makers (SDMs).

The letter dated April 27, 2026, sets out commitments from the Ministry of Mining and Critical Minerals (MCM) regarding the draft M-240 Major Mines Permit under the *Mines Act* for Red Chris. The Provincial SDMs will be available to discuss any concerns that TCG leadership may have with the referred permits prior to making their decisions.

### Closing

The Province understands that, as TCG Lands and Regulatory Affairs Director, you are scheduled to refer referred materials to the TCG Board on April 27, 2026, and that this letter will be provided to the Board for their consideration in their decision-making process. Following the TCG Notice of Decision, the Environmental Assessment Office intends to refer its materials to the Minister of Environment and Parks on May 19, 2026. As per our shared regulatory schedule, the related amendments to the ENV and MA permits will also be referred to the relevant statutory decision makers on May 19, 2026. The Province is committed to timely decision making for the EAC and major mines permits.

Should the Block Cave Project receive Tahltan consent and be issued an EAC by Ministers and receive positive decisions on the corresponding permits, the Province will seek to prioritize the commitments outlined above and work in good faith to advance discussions and negotiations according to the timelines noted.

We look forward to working together to progress the above matters collaboratively and as a priority over the coming months. Should you have any questions about this letter, we would be pleased to discuss those.

Sincerely,



Danielle Smyth  
A/Assistant Deputy Minister  
Environmental Assessment Office



Tania Demchuk  
Assistant Deputy Minister  
Ministry of Mining and Critical Minerals

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