



August 4, 2022

BC Environmental Assessment Office
Breanna Merrigan – Project Assessment Director

Re: Sukunka Mine EAC Application – Caribou Impact Assessment

Glencore plc. (Glencore) has applied for an Environmental Assessment Certificate (EAC) for the proposed Sukunka Coal Mine Project (the Project) via the BC Environmental Assessment Office (EAO). Since 2018, the EAO and Glencore have been engaged with the Project Caribou Sub-Working group in an attempt to quantify the potential effects of the Project to the Quintette caribou herd. The Provincial Caribou Recovery Program (CRP) has participated in the Sub-Working group since its inception, initially as a part of the Ministry of Forests, Lands, Natural Resource Operations and Rural Development, and now as a part of the Ministry of Land, Water, and Resource Stewardship. Stantec Consulting Ltd. (Stantec) was retained on behalf of Glencore to update the information provided in the original 2015 EAC application based on the best available information, as well as feedback provided by members of the working group. As engagement with the Sub-Working group is ending, the EAO has requested working group members review the updated materials and submit their views on the Project's potential impact to caribou and caribou habitat, and the adequacy of proposed mitigation and offset measures.

Previous Submissions

On behalf of the CRP, a review memorandum was submitted on August 6th, 2021 (August 2021 memo) providing comment of the Caribou Mitigation and Monitoring materials which included the Synopsis of the Project Effects Assessment and Proposed Offsets for Caribou document (Caribou Synopsis), the following comments were provided (summarized for brevity):

“...the current suite of mitigations and proposed offset measures are not likely to result in a net-neutral or positive effect on caribou and caribou habitat... . This determination is driven primarily by the considerable risk of caribou displacement from their preferred habitat surrounding the Project throughout the life of the mine. While this Project alone would not threaten the persistence of the Quintette caribou herd, it is expected that it would significantly hinder the recovery of the herd and increase the timeline to meet recovery objectives.”

Ongoing Working Group Engagement

Following the submission of the above-noted comments, an additional suspension was agreed to in early 2022 in an attempt for the caribou working group to better quantify potential project effects ahead of the decision process. At the outset of this additional suspension the First Nation Independent Technical Review (FNITR) team identified several avenues of additional analysis

that would be pursued to better quantify project impacts to caribou and caribou habitat. As the results of this analyses have not been shared with the CRP at the time of writing, they are not being considered in this memo.

In addition to the additional FNITR analysis, expert workshops (led by ESSA Technologies Ltd.) were arranged to investigate the potential mitigative factors of the proposed Adaptive Management Framework contained within the Caribou Synopsis. The intention of those workshops was not to finalize the framework, which remains in draft form, but rather to scope the range of mitigations that would be achievable within the final framework should the Project proceed. The workshops, while informative, have not altered the view from the August 2021 memo that the final framework is unlikely to significantly reduce the risk to caribou as a result of the Project. This is due primarily to the most significant risk factors (namely critical habitat loss and range displacement) being irreversible and/or difficult to monitor within a meaningful timeframe.

Conclusion

The Caribou Recovery Program's position on the Project remains consistent with the August 2021 memo. The Project is likely to have significant adverse effects to caribou and caribou habitat within a highly important habitat complex. These effects would significantly hinder the ability of the province to meet its stated recovery goals for the Quintette herd.

The Quintette caribou herd has been in a long-term state of decline due to cumulative impacts to caribou habitat driven by development across multiple industrial sectors. These impacts have caused abandonment of portions of the range, further intensifying the importance of the Bullmoose-Chamberlain complex where the Project is being proposed. Considering the high levels of existing disturbance, the Project is likely to have significant adverse cumulative effects that would increase the risk of extirpation for this already threatened caribou herd.

Closing

The assessment presented above is based on the information available at the time of writing from Glencore, the EAO, and other relevant sources available to me as a member of the Provincial Caribou Recovery Program. This assessment represents my views as a Registered Professional Biologist I have attempted to explain the relevant submissions upon which it was presented, recognizing that the final determination could become invalidated should that information change.

Sincerely,

Scott Schilds

Scott Schilds, R.P.Bio.
Wildlife Ecologist
LWRS – LUPPE Division