

<b>Project Name</b>	Brucejack Mine	<b>Inspection Status</b>	Final
<b>EA Certificate #</b>	M15-01	<b>Inspection No.</b>	IR2022-030
<b>Project Status</b>	Certified	<b>Inspection Start</b>	2022-06-07
<b>Sector</b>	Mines	<b>UTM</b>	9U 428206 N 6258662 N
<b>Trigger</b>	Planned Inspection	<b>Inspection Type</b>	Field and Administrative
<b>Project Description</b>	The Brucejack Mine (Project) is an underground gold and silver mine.		
<b>Location Description</b>	The Project is located approximately 65 kilometres northwest of Stewart, within the Regional District of Kitimat-Stikine.		
<b>Inspection Summary</b>	<p>On June 7, 2022, Environmental Assessment Office (EAO) Senior Compliance and Enforcement Officer Christie Lombardi (Officer Lombardi) inspected the Project against the requirements of Environmental Assessment Certificate (EAC) # M15-01 (Appendix 1).</p> <p>The Project was in Operations at the time of inspection.</p> <p>Project areas inspected include the access road, Wildfire Camp, Bowser West laydown, Knipple Camp and Transfer Area, and the mine site. The inspection included a debrief of observations with Project staff, Tahltan Central Government and Nisga’a Lisims Government representatives at the end of the inspection day.</p> <p>After review of observations and information obtained during the inspection, the following final compliance determinations have been made:</p> <ol style="list-style-type: none"> <li>1. COMPLIANT with Amendment 2 and the June 27, 2019 Enforcement Order with respect to electric fencing at Wildfire Camp and Knipple Camp.</li> <li>2. COMPLIANT with Condition 1 with respect to acceptable burn pit materials specified in the Air Quality Management Plan.</li> <li>3. NOT COMPLIANT with Condition 1 with respect to outdoor storage requirements for compressed gases in the Chemicals and Materials Storage and Handling Plan.</li> <li>4. NOT COMPLIANT with Condition 1 with respect to secondary containment for waste oil required by the Waste Management Plan.</li> <li>5. COMPLIANT with Condition 8 with respect to restricting public use of the access road.</li> <li>6. COMPLIANT with Condition 10 with respect to the Economic and Social Effects Mitigation Plan annual reporting and updating.</li> <li>7. COMPLIANT with Condition 13 with respect to annual glacier ablation monitoring and reporting.</li> <li>8. NOT COMPLIANT with Condition 14 and the December 9, 2016 Enforcement Order with respect to storing recyclable wastes in wildlife-proof containers.</li> <li>9. COMPLIANT with Condition 14 with respect to excluding wildlife from incinerator facilities.</li> <li>10. COMPLIANT with Condition 14 with respect to wildlife logs.</li> </ol> <p>On December 5, 2022, Officer Lombardi provided the preliminary inspection record to the Certificate Holder. On December 9, 2022, the Certificate Holder provided comments pertaining to the preliminary inspection record. These comments were reviewed by EAO</p>		

	<p>Compliance and Enforcement Branch (EAO CEB) and no errors of fact or omission were identified.</p> <p>Additional detail regarding these findings may be found in the sections below.</p> <p>The compliance determinations in this report reflect the findings from the inspection dates noted above. These determinations can change at any time upon information gathered through future inspections or if new information is obtained by EAO CEB.</p>
<b>In Attendance</b>	<p>Environmental Coordinator, Pretium Resources          Environmental Scientist, Pretium Resources          Lower Access Road Superintendent, Pretium Resources          Wildfire Camp Lead Hand, Pretium Resources          Knipple Camp General Foreman, Pretium Resources          Engagement Coordinator, Tahltan Central Government          Lands Officer, Nisga'a Lisims Government</p>
<b>Certificate Holder</b>	Pretium Resources Inc.
<b>Mailing Address</b>	2965 Tatlow Road, Smithers BC V0J 2N5
<b>Contact</b>	Torence Sandhals, Principal, Environment
<b>Phone No.</b>	778-724-4186
<b>Email</b>	TSandhals@pretivm.com

**INSPECTION DETAILS**

<p><b>Requirement 1:</b></p> <p><b>EAC# M15-01 Amendment 2</b> (Appendix 1)</p> <p>The Holder must install electrical fencing around the kitchen and living quarters at the Wildfire Camp to minimize the potential for human-bear conflict. The bear exclusion fencing must be designed, operated and maintained in accordance with the specifications for electric fences in the British Columbia Agricultural Fencing Handbook. The fence must be designed, operated and maintained to allow the fence to maintain a minimum voltage of 6000 volts through all electrified strands when it is operational. The fence must be operational during the times of the year when bears are likely to be present.</p> <p><b>Enforcement Order issued under Section 34(1) of the <i>Environmental Assessment Act (2002)</i></b> (Appendix 2)</p> <p>Pursuant to Section 34(1) of the Act, I order that the Certificate Holder, prior to August 1, 2019, install electric fencing around all camp facilities associated with the Project except for the camp facility located within the boundary of Mines Act Permit M-243 at the location of the underground mine and plant site.</p> <p>The electric fencing must be designed, operated, and maintained in accordance with the specifications for electric fences in the British Columbia Agricultural Fencing Handbook. The fences must maintain a minimum of 6000 volts through all electrified strands when they are operational and they must be operational between April 1st and November 15th each year for as long as the camp facilities contain wildlife attractants.</p> <p><b>Findings:</b></p> <p>On August 12, 2016, the EAO amended EAC# 15-01 to include a requirement to install electrical fencing at the Wildfire Camp (Appendix 1). On June 27, 2019, EAO CEB issued an Enforcement Order under Section 34(1) of the <i>Environmental Assessment Act (2002)</i> for failure to install electric fencing around camp facilities in the event of</p>
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wildlife conflict occurring at Project facilities (Appendix 2). This Enforcement Order rescinded and replaced a January 9, 2019 Enforcement Order requiring the Certificate Holder to install electric fencing around all camp facilities associated with the Project.

During the field inspection on June 7, 2022, Officer Lombardi observed an electrified perimeter fence around the Wildfire Camp (Photo 1). The fence controller indicated an operational voltage of 15,500 volts.



Photo 1. Electric fencing at Wildfire Camp.

Officer Lombardi also observed an electric perimeter fence around Knipple Camp with an operational voltage of 18,000 volts (Photo 2).



Photo 2. Electric fencing at Knipple Camp.

These observations provide evidence of compliance with Amendment 2 and the June 27, 2019 Enforcement Order with respect to electric fencing at Wildfire Camp and Knipple Camp.

**Compliance Determination:** In

**Requirement 2: Condition 1 of EAC# M15-01 Schedule B (Appendix 1)**

The Holder must prepare and submit an Environmental Management Plan (EMP), to the satisfaction of EAO, which applies to all Project Phases.

The EMP, at minimum, must include the Component Plans listed in Appendix A.

The EMP, at minimum, must include the mitigations identified in Chapters 29 and 30 of the Holder’s Application.

The Holder must implement the EMP according to timelines set by EAO. This can be no later than the commencement of Construction.

**Appendix A – Component Plans**

Air Quality Management Plan

**Air Quality Management Plan (Appendix 3)**

**Section 5.1.3 – Mitigation Measures and Best Management Practices, Burn Pits**

Acceptable materials for open burning include only dry, unpainted, untreated demolition and construction wood wastes, broken lumber and pallets, slabs, log ends and branches, brush and miscellaneous, non-recyclable cardboard and paper products. Excluded open burning materials include nuisance-causing combustibles such as painted and treated wood, sawdust, mulch, wood chips, stumps, rubber, plastics, tars, insulation, etc.

**Findings:**

The Air Quality Management Plan is included in the Project’s Environmental Management Plan as Appendix B. On June 1, 2022, the Certificate Holder provided documentation that confirmed that the current version of the Air Quality Management Plan is dated January 2022 (Appendix 4).

During the field inspection, Officer Lombardi inspected the burn pit at the Mine Site. Consistent with the signage present, the yet unburned materials in the pit were observed to be pallets and untreated wood (Photo 3).



Photo 3. Burn pit at Mine Site.

These observations provide evidence of compliance with Condition 1 with respect to acceptable burn pit materials specified in the Air Quality Management Plan.

**Compliance Determination:** In

**Requirement 3: Condition 1 of EAC# M15-01 Schedule B (Appendix 1)**

**Appendix A – Component Plans**

Chemicals and Materials Storage and Handling Plan

**Chemicals and Materials Storage and Handling Plan (Appendix 5)**

**Section 7.1.2 - Outdoor Storage of Compressed Gasses**

Supported on a raised concrete or other non-combustible platform and located in a fenced enclosure.

**Findings:**

The Chemicals and Materials Storage and Handling Plan is included in the Project’s Environmental Management Plan as Appendix F. On June 1, 2022, the Certificate Holder provided documentation that confirmed that the current version of the Chemicals and Materials Storage and Handling Plan is dated March 2021 (Appendix 4).

Officer Lombardi observed a propane tank storage area at the Wildfire Camp. The tanks were stored in a fenced enclosure on a gravel surface that was level with the adjacent area (Photo 4).



Photo 4. Propane tank storage at Wildfire Camp.

These observations provide evidence of non-compliance with Condition 1 with respect to outdoor storage requirements for compressed gases in the Chemicals and Materials Storage and Handling Plan.

**Compliance Determination:** Out - Notice of Non-Compliance

**Requirement 4: Condition 1 of EAC# M15-01 Schedule B (Appendix 1)**

**Appendix A – Component Plans**

Waste Management Plan

**Waste Management Plan (Appendix 6)**

**Section 5.2.2 – Mitigation Measures and Best Management Practices, Reuse and Recycling**

Used/waste oil generated during each Mine phase is collected and stored within specialized “Lube Pro” containers equipped with secondary containment. These units can be transferred safely to the incinerator or mechanic shop where an oil burner is located, for appropriate disposal.

**Findings:**

The Waste Management Plan is included in the Project’s Environmental Management Plan as Appendix S. On June 1, 2022, the Certificate Holder provided documentation that confirmed that the current version of the Waste Management Plan is dated December 2021 (Appendix 4).

At the Mine Site Waste Transfer Area, Officer Lombardi observed 14 barrels of waste oil stored outside on pallets without secondary containment (Photo 5). The Certificate Holder representative present identified that the drums had been stored there for a few days awaiting transfer to Knipple Camp.



Date & Time: Tue, Jun 07, 2022, 14:30:15 PDT  
 Position: 9 N 427350 6258616 (±3.5m)  
 Altitude: 1376m (±3.0m)  
 Datum: WGS-84  
 Azimuth/Bearing: 281° N79W 4996mils True (±12°)  
 Elevation Angle: -16.1°  
 Horizon Angle: +03.5°  
 Zoom: 0.5X  
 mine waste facility

Photo 5. Waste oil stored at Mine Site Waste Transfer Area without secondary containment.

These observations provide evidence of non-compliance with Condition 1 with respect to secondary containment for waste oil required by the Waste Management Plan.

**Compliance Determination:** Out - Warning - Refer to Enforcement Summary

**Requirement 5: Condition 8 of EAC# M15-01 Schedule B (Appendix 1)**

The Holder must construct and operate a barrier on the access road that will restrict public access across the bridge to the west side of the Bell-Irving River prior to commencement of access road upgrades or construction. Any such gate or barrier must be in place at any time that the access road is usable by a passenger or all-terrain vehicle, including snowmobiles, and must be staffed by personnel with the authority to grant or deny access based on provisions set out in the TAMP.

**Findings:**

Officer Lombardi observed a manned security gate across the Brucejack Access Road at the junction of the Brucejack Access Road and Highway 37, where security staff were controlling access to the Project site.

These observations provide evidence of compliance with Condition 8 with respect to restricting public use of the access road.

**Compliance Determination:** In

**Requirement 6: Condition 10 of EAC# M15-01 Schedule B (Appendix 1)**

The Holder must prepare and submit an Economic and Social Effect Mitigation Plan (ESEMP) to EAO.

The Holder must prepare and submit an ESEMP Report to EAO, Aboriginal Groups and LSA communities no later than January 31 each year during the construction and operation Project phases.

The Holder must update the ESEMP no later than April 1 each year during construction and operations Project phases.

*Refer to Appendix 1 for the full text of Condition 26.*

**Findings:**

On January 28, 2022, the EAO received a copy of the 2021 Economic and Social Effects Mitigation Plan Annual Report from the Certificate Holder (Appendix 7). The Certificate Holder indicated in the transmittal email that the report had also been submitted to Nisga’a Lisims Government, Nisga’a village representatives, Tahltan, Gitanyow, Tsetsaut Skii Km Lax Ha, various communities of the Gitksan and the communities of Terrace, Stewart, Smithers and the Hazeltons (Appendix 8).

On March 31, 2022, the EAO received the 2022 Economic and Social Effects Mitigation Plan from the Certificate Holder (Appendix 9). The plan and transmittal email note that changes to the plan from the previous year were minor.

These findings provide evidence of compliance with Condition 10 with respect to the Economic and Social Effects Mitigation Plan annual reporting and updating.

**Compliance Determination:** In

**Requirement 7: Condition 13 of EAC# M15-01 Schedule B (Appendix 1)**

The Holder must continue annual glacier ablation monitoring and reporting according to its current practice. The Holder must provide results to EAO, FLNR, MEM, MOE and Aboriginal groups no later than March 31 of each year during the construction, operations and closure Project Phases.

**Findings:**

On March 25, 2022, the EAO received a copy of the 2021 Annual Knipple Glacier Ablation Monitoring Report for the Project from the Certificate Holder (Appendix 10). The cover page of the report notes that it was submitted to the EAO; the BC Ministry of Forests Lands, Natural Resource Operations & Rural Development; the BC Ministry of Environment & Climate Change Strategy; the BC Ministry of Energy, Mines and Low Carbon Innovation; Nisga’a Lisims Government; Tsetsaut/Skii km Lax Ha; and Tahltan Central Government. The report presents 2021 data for glacier ablation and snowpack monitoring.

These findings provide evidence of compliance with Condition 13 with respect to annual glacier ablation monitoring and reporting.

**Compliance Determination:** In

**Requirement 8: Condition 14 of EAC# M15-01 Schedule B (Appendix 1)**

The Holder must prepare a Wildlife Management Plan (WMP) that applies to the Mine Site and Ancillary Infrastructure in consultation with, and to the satisfaction of, FLNR and MEM. The WMP must meet the Component Plan requirements set out in Condition 2. The WMP must include a WCP. The Holder must implement the WCP.

**Environmental Management Plan (Appendix 11)**

**Appendix U – Wildlife Management Plan**

**Section 5.5 - Building and Waste Management**

Mitigation and monitoring to minimize attractants will include the following measures:

- Store recyclable wastes and chemicals in wildlife-proof containers / facilities.

**Enforcement Order issued under Section 34(1) of the *Environmental Assessment Act* (2002) (Appendix 12)**

Pursuant to Section 34(1) of the Act, I order that the Certificate Holder, as of the date of this Order, and hereafter for the life of the Project, secure, dispose of, remove, or otherwise manage all wildlife attractants in a manner that prevents the attraction of wildlife and/or access to attractants by wildlife.

**Findings:**

On December 9, 2016, EAO CEB issued an Enforcement Order under Section 34(1) of the *Environmental Assessment Act* (2002) for failure to implement mitigation measures to prevent or reduce the potential for bear-human conflict on the Project (Appendix 12).

On June 1<sup>st</sup>, 2022, the Certificate Holder provided documentation that confirmed that the current version of the Wildlife Management Plan is dated December 2018, which is Appendix U of the Project's Environmental Management Plan (Appendix 4).

Over the course of the field inspection, Officer Lombardi inspected multiple project areas and found waste to be generally stored in suitable receptacles to prevent access by wildlife. At Wildfire Camp, however, a plastic recycle bin containing juice boxes was observed to be secured with a rock placed on top of the lid (Photo 6).



Photo 6. Unsecured recycling bin at Wildfire Camp containing animal attractants.

These observations provide evidence of non-compliance with Condition 14 and the December 9, 2016 Enforcement Order with respect to storing recyclable wastes in wildlife-proof containers.

**Compliance Determination:** Out - Notice of Non-Compliance

**Requirement 9: Condition 14 of EAC# M15-01 Schedule B (Appendix 1)**

**Environmental Management Plan (Appendix 11)**

**Appendix U – Wildlife Management Plan**

**Section 5.5 - Building and Waste Management**

Mitigation and monitoring to minimize attractants will include the following measures:

- Prevent wildlife from entering incinerators and sewage treatment facilities, where possible, using appropriate wildlife exclusion techniques.

**Findings:**

Officer Lombardi inspected Project incinerators at Knipple Camp and the Mine Site. The incinerator at Knipple Camp was in the waste yard, which was surrounded by an approximately nine-foot fence with three strands of barbed wire on top, with an electric fence around approximately three quarters of the yard (Photo 7). The incinerator at the Mine Site was inside the mine waste facility building (Photo 8).

Date & Time: Tue, Jun 07, 2022, 12:53:31 PDT  
Position: 9 N 438076 6251173 (±4.6m)  
Altitude: 476m (±3.6m)  
Datum: WGS-84  
Azimuth/Bearing: 004° N04E 0071mils True (±12°)  
Elevation Angle: +09.9°  
Horizon Angle: -01.2°  
Zoom: 0.5X  
knipple camp waste facility



Photo 7. Incinerator at Knipple Camp.

Date & Time: Tue, Jun 07, 2022, 14:54:53 PDT  
Position: 9 N 426424 6258967 (±4.3m)  
Altitude: 1378m (±4.1m)  
Datum: WGS-84  
Azimuth/Bearing: 309° N51W 5493mils True (±12°)  
Elevation Angle: -03.3°  
Horizon Angle: +00.6°  
Zoom: 0.5X  
mine incinerator




Photo 8. Incinerator at Mine Site.

These findings provide evidence of compliance with Condition 14 with respect to excluding wildlife from incinerator facilities.

**Compliance Determination:** In

<p><b>Requirement 10: Condition 14 of EAC# M15-01 Schedule B</b> (Appendix 1)</p> <p><b>Environmental Management Plan</b> (Appendix 11)  <b>Appendix U – Wildlife Management Plan</b>  <b>Section 6.1.6 Incidental Wildlife and Wildlife Incident Monitoring</b></p> <p>Wildlife observations made by environment staff and other mine personnel will be recorded in a general wildlife log.</p>
<p><b>Findings:</b></p> <p>Upon request, the Certificate Holder provided Officer Lombardi with the wildlife sighting logs for June 1 to 15, 2022 (Appendix 13). The provided logs include mountain goat, bear, porcupine, grouse, wolf, marmot, fox and wolf sightings. For each wildlife observation, the log included the date, season, time, location and an assessment if the animal was a potential threat.</p> <p>These findings provide evidence of compliance with Condition 14 with respect to wildlife observation logs.</p>
<p><b>Compliance Determination:</b> In</p>

<b>Actions Required by Certificate Holder &amp; Additional Comments</b>	
None at this time.	
<b>Enforcement Summary</b>	
<p><b>PRETIUM RESOURCES INC. IS NOTIFIED THAT THE PROJECT IS NOT COMPLIANT WITH CONDITION 1 WITH RESPECT TO OUTDOOR STORAGE OF COMPRESSED GASES AND RECYCLABLE WASTES (REQUIREMENTS 3 AND 8 ABOVE).</b></p> <p><b>SEE APPENDIX 14 FOR WARNING LETTER ISSUED ON DECEMBER 12, 2022 FOR NON-COMPLIANCE WITH CONDITION 1 WITH RESPECT TO SECONDARY CONTAINMENT FOR WASTE OIL (REQUIREMENT 4 ABOVE).</b></p> <p><b>EAO CEB MAY INSPECT TO DETERMINE IF THE BRUCEJACK MINE PROJECT HAS BEEN BROUGHT BACK INTO COMPLIANCE WITH THESE REQUIREMENTS. CONTINUED NON-COMPLIANCE WITH THESE REQUIREMENTS MAY RESULT IN ADDITIONAL ENFORCEMENT UNDER THE ENVIRONMENTAL ASSESSMENT ACT.</b></p>	
<b>Regulatory Considerations</b>	
None at this time.	
<b>Inspection Conducted by</b>	
 Christie Lombardi Senior Compliance & Enforcement Officer	<p><b>Date Preliminary Record Sent to Certificate Holder</b></p> <p><b>2022-12-05</b></p>
	<p><b>Date Finalized</b></p> <p><b>2022-12-12</b></p>
<b>Appendices</b>	
<p>Appendix 1: Environmental Assessment Certificate # M15-01 with Schedules A and B and Amendments 1-7</p> <p>Appendix 2: Brucejack Section 34 Order - Bear Fencing 2019-06-27</p> <p>Appendix 3: Air Quality Management Plan January 2022</p> <p>Appendix 4: Management Plan Index from 2021 Annual Reclamation Report</p>	

- Appendix 5: Chemicals and Materials Storage and Handling Plan July 2021
- Appendix 6: Waste Management Plan December 2021
- Appendix 7: 2021 Economic and Social Effects Mitigation Plan Annual Report
- Appendix 8: 2021 Economic and Social Effects Mitigation Plan Annual Report Transmittal 2022-01-28
- Appendix 9: 2021 Economic and Social Effects Mitigation Plan 2022-03-31
- Appendix 10: 2021 Annual Knipple Glacier Ablation Monitoring Report 2022-03-25
- Appendix 11: Brucejack Environmental Management Plan December 2018
- Appendix 12: Brucejack Section 34 Order - Wildlife Attractants 2016-12-09
- Appendix 13: Wildlife Sightings June 1-15 2022
- Appendix 14: Brucejack Mine 2022-12-12 Warning Letter EN2022-032

**Environmental Assessment Office - Compliance & Enforcement Branch**

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