



## Memo

Date: January 20, 2021

To: BC Environmental Assessment Office

From: Telkwa Coal Ltd. (TCL)

**Re: Use of Valued Components versus Intermediate Components for the Tenas Project**

In response to comments received during the review of the Application Information Requirements (AIR) for the Application for an Environmental Certificate from your Office, Telkwa Coal Limited (TCL) has reviewed its proposed use of Valued Components and Intermediate Components. As requested through consultation and engagement, the AIR has been revised to use only Valued Components. This change has been made to clearly reflect the importance of all components considered in the AIR to the Indigenous, Working Group, and public participants.

TCL followed the BC EAO guidance<sup>1</sup> on selecting Valued Components (VC) and Intermediate Components (IC) through issues scoping and the role of the component as a **receptor** (VC), or **pathway** to a receptor (IC), in an effects pathway. **Every component identified**, whether termed “Valued” or “Intermediate”, was considered **valuable**. The terms “Valued” and “Intermediate” did not imply relative importance based on environmental or social values. The technical rationale to this approach is described in the memo dated August 19, 2020 “Water Quality as an IC for the Tenas Project EA” (Hemmera Envirochem Inc., File 989388-01), found on the BC EAO ePIC site [here](#).

We recognize that some participants interpreted an Intermediate Components as being less valuable than a Valued Component. We restate that every component that was identified as “Valued” or “Intermediate” is valuable and key to developing a fulsome assessment, hence our inclusion of the component for study and assessment in the AIR. However, we have simplified the approach, and will handle all components, whether a receptor or pathway component, as Valued Components.

An individual assessment and significance determination will be conducted for residual effects for all VCs, including former ICs, as described in the AIR. Each VC will still be considered either a pathway or receptor component, and linkages to other VCs will be identified for each VC. Changes in one VC that may affect another VC will be considered within the receptor VC assessment (e.g., the linkage between the Water Quality VC and Fish and Fish Habitat VC will be considered in the Fish and Fish Habitat VC since it is the receptor of changes that may occur in Water Quality). VC Linkages for the Tenas Project are identified in Table 3 of the dAIR.

We reiterate that every component selected for assessment is valuable and important. However, we trust that this simplification will provide a greater understanding of the effects assessment process and confidence in the outcomes.

Kind regards,

Angela Waterman, Director – Environment and Government Relations, Telkwa Coal Limited

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<sup>1</sup> BC Environmental Assessment Office (2013). Guideline for the Selection of Valued Components and Assessment of Potential Effects. Accessed on January 15, 2021 at: <https://www2.gov.bc.ca/assets/gov/environment/natural-resource-stewardship/environmental-assessments/guidance-documents/eao-guidance-selection-of-valued-components.pdf>