



Cariboo Gold Project

NOTICE REGARDING APPLICATION REVIEW

JANUARY 24, 2022



EAO

Environmental
Assessment Office

SUMMARY

Osisko Development Corp. (ODV) proposes to develop the Cariboo Gold project (Cariboo Gold), an underground gold mine with a production capacity of 4,750 tonnes per day and an operational life of 16 years, located in the District of Wells and Cariboo Regional District, British Columbia (B.C.).

On December 18, 2020, the Environmental Assessment Office (EAO) issued a *Notice of the Readiness Decision* for Cariboo Gold to proceed to an environmental assessment (EA) under Section 18 of the *Environmental Assessment Act* (2018) (the Act). The Readiness Decision then initiated the legislated 120-day Process Planning phase of the EA for Cariboo Gold.

On April 16, 2021, the EAO issued the *Process Order* (including the Project scope, Assessment Plan and Application Information Requirements) and Regulatory Coordination Plan under Section 19(2) of the Act. The Process Order and Regulatory Coordination Plan provided the procedures and methods for the EA, and detailed the scope of the project, what information must be provided, how the information must be gathered and analyzed, who must be involved, how they must be engaged, and the timing of each of the subsequent phases of the EA.

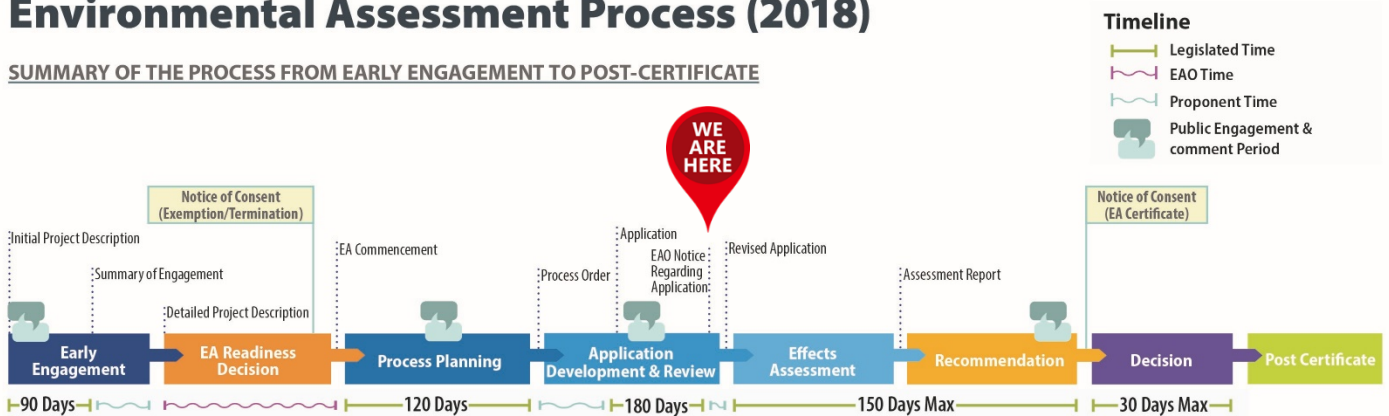
Cariboo Gold proceeded to the Application Development and Review phase of the EA. During this phase, ODV developed its *Application for an Environmental Assessment Certificate* (Application) and engaged participating Indigenous nations and Technical Advisory Committee members in accordance with the requirements of the Process Order. During this phase, there is a stage where the Application is developed by the proponent, and then a stage where the Application is reviewed by the EAO, participating Indigenous nations, Technical Advisory Committee, Community Advisory Committee, and the public.

On July 28, 2021, ODV submitted its Application to the EAO for review under Section 27(1) of the Act. The EA process then moved into the 180-day Application Review stage wherein the EAO sought review and comment on the Application from participating Indigenous nations, the Technical Advisory Committee, Community Advisory Committee, and also from the public through a 30-day public comment period. Proponent-led consultation activities with the Indigenous nations, TAC, and the public were carried out during the Application Development and Review Phase as well.

Application review resulted in information requests generated by Technical Advisory Committee members, the EAO, and participating Indigenous nations, which are being responded to by ODV through the EA process. The public provided feedback on the characterization of potential effects and the proposed mitigation measures, identified outstanding concerns, and shared experiences with public engagement so far. ODV was directed to review and respond to comments from participating Indigenous nations, Technical Advisory Committee members and the public.

Environmental Assessment Process (2018)

SUMMARY OF THE PROCESS FROM EARLY ENGAGEMENT TO POST-CERTIFICATE



PURPOSE OF THIS DOCUMENT

As outlined by Section 27(2)(b) of the Act, the EAO is required to provide notice to ODV with the results of the public comment period, advice received by the Technical Advisory Committee and Community Advisory Committee regarding the Application, and any other matters that the Chief Executive Assessment Officer considers relevant, within 180 days of receiving the Application.

This Notice contains information about the Application review stage for Cariboo Gold including:

- An overview of the feedback the EAO received from the public during the public comment period;
- An overview of the feedback the EAO received from participating Indigenous nations, the Technical Advisory Committee, and the Community Advisory Committee; and
- The EAO's direction to ODV respecting the next steps in the EA process.

The EAO notes that the concerns were initially responded to through Application review by ODV, and this resulted in additional technical meetings, technical memos, and commitments from ODV. ODV will continue to work to resolve all comments raised during Application review prior to the submission of the Revised Application. These key concerns will also be brought forward and discussed further in the EAO's Assessment Report, which is the final report at the conclusion of the Effects Assessment phase. The Assessment Report is intended to provide a full summary and balanced review of the entire EA process, while characterizing the potential adverse and positive effects of Cariboo Gold, mitigation measures committed to by ODV, and any requirements the EAO will impose on ODV, should an Environmental Assessment Certificate be issued.

For more information about the Environmental Assessment process, please see the EAO's [User Guide](#).

PUBLIC COMMENT PERIOD OVERVIEW

Public participation in the EA process helps ensure that community values and public goals are considered in project planning and decision-making. Public comments also help the EAO ensure that all potential adverse effects of a project are captured and appropriately assessed.

During Application review, the EAO held a public comment period from September 7 to October 7, 2021 seeking feedback from the public on ODV's Application. This was the third public comment period held for Cariboo Gold, with the first public comment period occurring during the Early Engagement phase and the second occurring during the Process Planning phase. During the third public comment period, the EAO received a total of 118 comments through the EAO's Project Information Centre (EPIC) website. The comments received came primarily from individuals living near the location of Cariboo Gold including Wells, Quesnel, Prince George, Williams Lake and Barkerville. Other comments came from individuals who indicated that they often travel to the region where Cariboo Gold is being proposed and from contractors that self-identified that they have worked for ODV's existing operations.

During the Application review public comment period, the EAO held two virtual open houses, which were held online due to the COVID-19 pandemic and associated safety measures. The first open house, on September 22, 2021 from 5:00 to 7:00 pm, was attended by 33 participants while the second open house, on September 23, 2021, from 11:00 am to 1:00 pm, was attended by 50 participants. The open houses included:

- A presentation by the EAO on the Application Review stage of the EA process;
- A presentation by ODV on the proposed project; and
- An opportunity to ask questions online to the EAO and ODV.

SUMMARY OF COMMENTS FROM THE PUBLIC COMMENT PERIOD

A total of 118 comments were received during the public comment period on the Application. The key concerns included:

- Potential increases in acoustic (noise and vibration) and light from the Mine Site;
- Potential effects to the tourism industry in the area (i.e., visitor experience, challenges to tourism operators, and availability of accommodation);
- Alternative means of carrying out the project (specifically in relation to the concentrator location, Island Mountain portal, and transmission line route);
- Concerns regarding potential effects to visual resources and visual quality of both the transmission line and the mine site/concentrator building and the need to consider seasonal variations and weather condition;
- Socio-economic changes and potential effects to the community including on strained community infrastructure;
- Clarity around ODV's plans for infrastructure upon mine closure, site remediation, and potential community benefits (relating to the transmission line and the work camp at the mine site);
- Effectiveness of proposed mitigation measures; and
- Connection between Cariboo Gold and existing and planned mining operations near Wells, including exploration.

The EAO received multiple comments that came from members of the public indicating an interest in Cariboo Gold and a desire for it to proceed. Some of these comments were from contractors and employees involved in ODV's existing operations. Other comments were submitted that indicated an interest in the economic growth and employment opportunities that Cariboo Gold could potentially bring to the surrounding area.

ODV developed and submitted a Public Engagement and Consultation Report within 30 days of the close of the public comment period, which included ODV's responses to the public comments received.

The next public comment and engagement period, including additional open houses, will offer the public an opportunity to review the EAO's draft Assessment Report. This is anticipated to take place in July 2022.

COMMUNITY ADVISORY COMMITTEE

Following the Process Planning phase, 25 individuals had indicated an interest in joining the Community Advisory Committee and in response the EAO formed the Community Advisory Committee. Community Advisory Committee members provided comments during all three public comment periods. During the public comment period held in the Application Development and Review phase, fourteen submissions were made by members of the Community Advisory Committee and are summarized above in the list under 'Summary of Comments from the Public Comment Period.' The EAO also held four meetings with the Community Advisory Committee throughout the Application Development and Review phase to discuss the status of the EA process and provide an opportunity to ask any questions.

The EAO asked the Community Advisory Committee members to provide any feedback in addition to that provided during the public comment period. The following feedback was collectively developed by the Community Advisory Committee:

The Community Advisory Committee is a group of 25 individuals that live in the communities located near and adjacent to the proposed mine site. Although the Community Advisory Committee has appreciated the additional engagement that this committee has provided an opportunity for, many committee members have felt an inability to affect project design and felt that they did not receive meaningful and timely responses to their concerns from Osisko, creating a strong sense of frustration and disappointment. Many of the Community Advisory Committee members feel that the proposed mine site, located within the town of Wells, will negatively affect their mental and physical health, ability to peacefully enjoy their town, and livelihoods. Although the Application speaks to these components in the assessment, many members of the Community Advisory Committee would like to see the potential effects to Wells studied in more detail in further Application review and in the Revised Application, as

reflected in their comments. Most of the members of the Community Advisory Committee do not support the project as currently designed, specifically the location of the proposed mine site located within the town of Wells.

ODV developed and submitted a [Public Engagement and Consultation Report](#) which provided responses to all comments provided by Community Advisory Committee members in the required timeline during the public comment period. The EAO will continue to engage with the Community Advisory Committee throughout the EA process.

PARTICIPATING INDIGENOUS NATIONS

In keeping with its commitments to reconciliation in the Act, the EAO engaged deeply with the three participating Indigenous nations (Lhtako Dené Nation, Xatśúll First Nation, and Williams Lake First Nation) on the draft Notice respecting the Application. The EAO shared the Application as well as a draft of this Notice with each participating Indigenous nation for input. Additionally, the EAO held monthly meetings with each participating Indigenous nation throughout the Application Development and Review phase. All three participating Indigenous nations provided comments on the Application for response from ODV. ODV's responses and proposed updates were shared with the participating Indigenous nations for their final review and comment.

Participating Indigenous nations are also members on the Technical Advisory Committee. Involvement of participating Indigenous nations in the Technical Advisory Committee is in addition to the EAO's engagement with each participating Indigenous nation individually.

The comments from the participating Indigenous nations and ODV's responses were tracked through the Application Review [Issues Tracking Table](#).

The EAO highlights the following key concerns received from the participating Indigenous nations:

- a) Health of fish, wildlife, vegetation and ecosystems:
 - Potential effects on water quality, aquatic resources, fish, fish habitat, and riparian habitat in nearby surface water bodies from effluent discharge and drawdown of the existing tailings storage facility at QR Mill, dust, historical contamination (e.g., mercury and selenium), and waste rock storage seepage;
 - Adequacy of the water quality, aquatic health, and fish baseline data sets and whether they will be robust enough to enable detection of effects of Cariboo Gold on these values during Aquatic Effects Monitoring Programs that will be conducted after Cariboo Gold commences;
 - Contribution of ODV to improvements, recovery, and conservation of fish habitat in waterbodies potentially impacted by Cariboo Gold;
 - Contribution to cumulative adverse effects on southern mountain caribou, including from increased linear developments, and conservation and recovery of the Barkerville caribou herd;
 - Potential effects to and loss of wetlands and wetland functions;
 - Potential effects on wildlife habitat from clearing during construction, and the need for additional surveys pre-construction while allowing flexibility in project design and process based on the results of these additional surveys;

- b) Indigenous health:
 - Potential for underestimation of dust deposition contribution to country foods, requesting monitoring to confirm predictions;
 - Increased concentrations and potential bioaccumulation of metals in soils and terrestrial plants that are consumed by Indigenous people and could affect Indigenous health;
 - Potential effects on groundwater, including from historical mine workings and surface water-groundwater interactions;

- c) Land stewardship:
 - o Potential effects leading to direct mortality of ungulates and large carnivores, which lead to residual effects on land stewardship;
 - o Potential effects on seasonal timing of harvesting activities by Indigenous nations;

- d) Project Infrastructure:
 - o Potential influence of climate change on design of proposed water management system;
 - o Water treatment capacity at the mine and mill site and plans for temporary closures (such as care and maintenance);
 - o Seepage and potentially failure of the geomembrane lining proposed for the filtered stack tailings storage facility at QR Mill;
 - o Effectiveness and duration needed of the proposed water treatment system; and
 - o Legacy issues of building on an existing contaminated site.

To review ODV's responses to each comment from the participating Indigenous nations, please review the [Issues Tracking Table](#).

TECHNICAL ADVISORY COMMITTEE

The EAO engaged with, and sought advice from, the Technical Advisory Committee on the Application as well as a draft of this Notice. Additionally, the EAO held monthly meetings with the Technical Advisory Committee throughout the Application Development and Review phase as well as additional issue-specific meetings. The EAO received comments from the following members of the Technical Advisory Committee on the Application:

- e) Cariboo Regional District;
- f) District of Wells;
- g) Ministry of Agriculture, Food and Fisheries;
- h) Ministry of Energy, Mines and Low Carbon Innovation;
- i) Ministry of Environment and Climate Change Strategy;
- j) Ministry of Forests, Lands, Natural Resource Operations and Rural Development;
- k) Ministry of Jobs, Economic Recovery, and Innovation;
- l) Ministry of Municipal Affairs;
- m) Ministry of Tourism, Arts, Culture and Sport;
- n) An external consultant retained by the EAO for the noise and light assessments;
- o) Interior Health Authority; and
- p) Northern Health Authority.

ODV was required to respond to comments submitted by members of the Technical Advisory Committee. The comments and status of each comment from the Technical Advisory Committee and ODV's responses were tracked through an [Issues Tracking Table](#). There were three rounds of comments in Application review, and following each response round from ODV, the members of the Technical Advisory Committee determined if the comment was resolved or still unresolved. This resulted in 58 percent of comments being resolved. Engagement with the Technical Advisory Committee will continue and ODV will need to show how outstanding comments were addressed and associated updates that were made in response. Responses to unresolved comments will be factored into the decision on whether or not to accept the Revised Application.

Although all issues raised by the Technical Advisory Committee are detailed in the [Issues Tracking Table](#), the EAO highlights the following key concerns received from the Technical Advisory Committee grouped into six key areas:

- a) Wildlife, vegetation, and ecosystems:
 - o Dust deposition on provincially and federally listed plant and lichen species from gravel-surfaced roads and other sources of fugitive dust;
 - o Additional assessments for potential effects to and effective mitigation for fish, bats, moose, mule deer, grizzly bear, caribou, marten, fisher, western toad, snake, and moose habitat be conducted;
 - o Contributions of Cariboo Gold, particularly from the transmission line, to the cumulative effects on the declining population of southern mountain caribou;
 - o Effects on caribou migration corridors and an increase in linear features in caribou habitat, leading to increased habitat fragmentation;

- b) Human health risk assessment:
 - o The need to include mine camp workers in more sections of the multi-media human health risk assessment;
 - o Missing from the human health risk assessment: effects on groundwater users, regional existing context, considerations of implication of small increases of contaminants when levels are elevated at baseline, description of conservativeness of the assessment include screening criteria, effectiveness of proposed mitigation measures, and cumulative effects assessment;
 - o Proximity of proposed mine site to residences in Wells other vulnerable receptors such as daycares or schools;

- c) Air quality:
 - o Predicted exceedances of air quality objectives for some criteria air contaminants in both the construction and operations phases within the community of Wells. Some air contaminants are considered non-threshold but have the potential to cause health effects below objective levels. Predicted increases of some air contaminants, which are below objective levels, are an additional potential concern;
 - o The air quality effects assessment was based on baseline ambient air quality data from the community of Quesnel, and the relationship between this data and the Project location increases uncertainty of the potential effects predicted in the District of Wells;

- d) Water treatment and water quality:
 - o Conservativeness and appropriateness of source terms and inputs to the water quality models (both at the Mine Site and QR Mill Site) remain uncertain;
 - o Uncertainty of the ability of the water treatment plant to effectively mitigate water quality effects at the Mine Site and QR Mill;
 - o Uncertainty in effects on water quality based on outstanding concerns related to mine waste management and mitigation plans;
 - o Uncertainty in ability to assess cumulative effects to surface water quality, including the uncertainty in the ability to differentiate between historical and future mining impacts;
 - o Potential for water quality guideline exceedances in Rudy Creek following drawdown of water at the QR Mill tailings storage facility;
 - o Clarification on causes for selenium tissue guideline exceedances and potential for bioaccumulation;
 - o Conservativeness of climate scenarios used in water balance modelling to develop a robust water management infrastructure;

- Cumulative effects to receiving environment water quality from Cariboo Gold, as well as current and historical mining in the area;
- e) Socio-economic:
- Employment, business, and training opportunities and economic benefits that will be available for local and regional residents;
 - Contribution of Cariboo Gold to increased housing demands in Wells and potential effects to vulnerable groups;
 - The need for a socio-economic monitoring plan, in particularly how to conduct community-based monitoring for potential effects to vulnerable groups;
 - Limited understanding of potential effects to distinct human populations (such as by age, gender, family characteristics, etc.);
 - Potential effects of noise, traffic, light, visual quality, and traffic on particularly the residents, but also the visitors and tourists, in Wells;
 - Potential effects to emergency response services and health care services in Wells;
- f) Project infrastructure:
- Duration of the proposed water treatment activities and transmission line infrastructure;
 - Concerns related to the historical contamination and how this will factor into reclamation plans for Cariboo Gold; and
 - Uncertainty in assessing long term monitoring and maintenance plans of the geomembrane/lining system.

NEXT STEPS

ODV may submit a Revised Application under Section 27(3) of the Act, which updates the Application in accordance with:

- The information required by the [Cariboo Gold Process Order](#);
- The [Issues Tracking Table](#), including any updates to the table that occur for issues that are open currently at the time of this Notice.

According to Section 27(4) of the Act, the Chief Executive Assessment Officer may accept a Revised Application for review only if the Chief Executive Assessment Officer is satisfied that the Revised Application contains the information required by the Process Order and that the Revised Application responds to the updates directed in this Notice.

If a Revised Application is accepted, Cariboo Gold would proceed to the Effects Assessment phase, during which the EAO will have 150 days to develop a draft Assessment Report and a draft Environmental Assessment Certificate, with certificate conditions and project description. For more information about the Effects Assessment phase, please see the EAO's [Effects Assessment Policy](#).

For information on the deliverables and timelines, as well as the roles and responsibilities of the EAO, ODV, participating Indigenous nations, Technical Advisory Committee, Community Advisory Committee and the public for each of the subsequent EA phases, please see the Cariboo Gold [Assessment Plan](#).