

**SCHEDULE B**  
**TABLE OF CONDITIONS**  
**FOR THE**  
**CARIBOO GOLD PROJECT**  
**(PROJECT)**  
**ENVIRONMENTAL ASSESSMENT CERTIFICATE**  
**#M23-01**

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## DEFINITIONS

Application	Revised Application from Osisko Development Corp. dated October 14, 2022, to the Environmental Assessment Office applying for an Environmental Assessment Certificate, pursuant to Section 27 of the <i>Environmental Assessment Act</i> , accepted for review on November 30, 2022. The Application includes any supplementary information filed by the Holder for the purposes of completing the assessment.
Care and Maintenance	A period when Construction or Operations cease for more than 90 days continuously or upon receipt of notification from the Holder under condition 11.6.
Closure	The phase of the Project where all development and production ceases. Mining facilities and infrastructure, with the exception of the mine access road, camp access road, the A Road, water treatment plants and associated discharge infrastructure, access to the Quesnel River Mill, transmission line, and infrastructure required for ongoing monitoring and maintenance, are decommissioned and/or removed from the Project Site. Reclamation activities continue to be conducted and completed. Closure ends when all activities cease, including reclamation activities.
Construction	The phase of the Project during which physical alteration of land, vegetation or any other aspect of the natural environment occurs, including upgrading, repairing, replacing, or removing, any existing work or infrastructure. Construction does not include any activities conducted solely for investigative purposes under a valid permit or authorization.
Contaminant of Potential Concern	A contaminant of potential concern as defined in “Defining Parameters of Concern for Mine Effluent Discharge Authorization Applications” (ENV 2019, or as updated or replaced from time to time).
Criteria Air Contaminant	Criteria air contaminants are those pollutants for which ambient air quality standards have been published and established by government and include sulphur oxides, carbon monoxide, nitrogen oxides, volatile organic compounds, particulate matter, and ammonia.
Dwelling	Any actively occupied residence with the exception of an Employee residence, dormitory, or construction camp located within an industrial plant boundary or a residence that is owned by the industrial operator. Trailer parks and campgrounds may qualify as a dwelling if it can be demonstrated that they are in regular and consistent use during the applicable season.
Employee	Individuals employed by the Project including contractors, or those employed by the Holder on business related to the Project (collectively, Employees).

Holder	The person to whom this Certificate has been issued, or, if this Certificate has been transferred in accordance with Section 33 of the Act, the person to whom this Certificate has been transferred.
Mitigations Table	Appendix 20.1-1 (Summary of Proposed Mitigation Measures for the Cariboo Gold Project) – Revision 2, dated July 2023.
Operations	The phase of the Project beginning with the commercial operation date of the Project, which is the date on which commercial mill production is achieved using ore from this Project and ending when commercial mill production of ore from this Project permanently ceases and the Closure phase begins.
Participating Indigenous Nations	Lhtako Dené Nation, Xat'sülil First Nation, and Williams Lake First Nation
Qualified Person	A person who has the training, experience, and expertise in a discipline relevant to the field of practice set out in the condition.
Qualified Professional	A person who has the training, experience, and expertise in a discipline relevant to the field of practice set out in the condition, and who is registered with the appropriate professional organization in British Columbia, is acting under that organization's code of ethics and is subject to disciplinary action by that organization.

## ACRONYMS

ATV	All-terrain vehicle
Certificate	Environmental Assessment Certificate
dBA	A-weighted decibel
EAO	Environmental Assessment Office
EMLI	Ministry of Energy, Mines and Low Carbon Innovation
ENV	Ministry of Environment and Climate Change Strategy
GHG	greenhouse gas
IEM	Independent Environmental Monitor
WLRS	Ministry of Water, Land and Resource Stewardship
MOF	Ministry of Forests
NHA	Northern Health Authority
QR Mill	Quesnel River Mill
µm	micrometre or micron

# CONDITIONS

## 1. Document Review

- 1.1 The requirements within this condition apply to all plans, programs or other documents required under this Certificate except for the terms of engagement required under condition 9.
- 1.2 The EAO may, within 45 days, or another period if a condition in this Certificate provides otherwise, of receiving a document required by a condition notify the Holder that:
  - a) The Holder may implement the actions in the document; or
  - b) A revised document must be provided for approval of the EAO.
- 1.3 If a notification provided by the EAO under subsection 1.2 to the Holder sets out revisions that are required to the document, the Holder must change the document in accordance with the notification.
- 1.4 If the EAO does not provide a notification to the Holder within the period referred to in subsection 1.1, the Holder may implement the actions in the document, unless a condition in this Certificate provides otherwise.

## 2. Document Updates

- 2.1 The requirements within this condition apply to the plans and reports required under conditions 10, 11, 13, 14, 15, 16, 17, 18, 19, 20, 21, and 22 in this Certificate.
- 2.2 The Holder may, or the EAO may require the Holder to, make changes to any document 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 Certificate, or the purpose and objectives set out in the document, as required by paragraph 3.1(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.
- 2.3 The Holder must provide the EAO with the updated version of the document if changes are made to any document under subsection 2.2.

## 3. Document Development

- 3.1 The requirements within this condition apply to the plans and reports required under conditions 10, 11, 13, 14, 15, 16, 17, 18, 19, 20, 21, and 22 in this Certificate.
- 3.2 At a minimum, documents must include the following information:
  - a) Purpose and objectives of document;
  - b) Plain language summary of the document;
  - c) Roles and responsibilities of the Holder, Project personnel and any contractors employed for the purposes of implementing the document;
  - d) Names and, if applicable, professional certifications and professional stamps, of those responsible for the preparation of the document;
  - e) Schedule for implementing the actions in the document throughout the relevant Project phases;

- f) How the effectiveness of any mitigation measures will be evaluated including the schedule for evaluating effectiveness;
- g) Schedules and methods for the submission of reporting required under the applicable condition, and the form and content of those reports; and
- h) Process and timing for updating the document, including any consultation with agencies and Participating Indigenous Nations that would occur in connection with such updates.

3.3 Where a document includes monitoring requirements, the document must include:

- a) A description of baseline information that will be used to support monitoring of the effectiveness of mitigation;
- b) Methods, objective, location, frequency, timing, and duration of monitoring; and
- c) Scope, content, and frequency of reporting of the monitoring results.

## 4. Trigger Response

4.1 Where the following conditions of this Certificate requires the Holder to develop a plan, program or other document that includes monitoring, including monitoring of mitigation measures or monitoring to determine the effectiveness of the mitigation measures, the Holder must, subject to 4.4, include trigger-response actions in that plan.

4.2 The objective of trigger-response planning is to identify the circumstances that will require the Holder to implement alternate or additional mitigation measures, monitoring, or other adjustments through adaptive management to address effects of the Project if the monitoring shows that those effects:

- a) Are not being mitigated to the extent contemplated in the Application;
- b) Are different than those predicted in the Application; or
- c) Have exceeded the triggers identified in paragraph 4.3a of this condition.

4.3 The trigger-response in the plan must include at least the following:

- a) The identification of qualitative and quantitative triggers (a trigger is a type or level of change using ENV's Development and Use of Trigger Response Plans Technical Guidance (March 2022, or as updated or replaced from time to time), which, when observed through monitoring and/or stakeholder/community/service provider feedback, will require the Holder to alter existing, or develop new, mitigation measures to avoid, reduce, and/or remediate effects);
- b) The methods that will be applied to detect when a qualitative or quantitative trigger, or type or level of change referred to in 4.3a has occurred;
- c) A description of the process and timing to alter any existing mitigation measures or develop new mitigation measures to reduce or avoid effects;
- d) The means by which the identification of the new and/or altered mitigation measures will be applied when any of the changes identified in paragraphs 4.2 occur, or the process by which those will be established and updated over the relevant timeframe for the specific condition;
- e) The monitoring program that will be used to determine if the altered or new mitigation measures and/or remediation activities are effectively mitigating or remediating the effects and or avoiding potential effects; and

- f) The scope, content, and frequency of reporting on the implementation of altered or new mitigation measures.
- 4.4 If there are any requirements or mitigation measures required in the plan, program or other document for which trigger-response, or elements of trigger-response listed in 4.3, is assessed to be not appropriate or applicable, the plan must include identification of those requirements and measures, and the rationale for that assessment.

## **5. Consultation**

- 5.1 Where a condition of this Certificate 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 Certificate, that timeframe; or
      - B) If a timeframe for providing views to the Holder is not specified in the relevant condition of this Certificate, 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, including explanations in (c); and
  - e) Provide a copy of the consultation record to the EAO at the same time the associated document is submitted to the EAO.

## **6. Compliance Verification and Reporting**

- 6.1 The Holder must provide to the EAO any document, data or information requested by the EAO for the purposes of compliance inspection and verification. The Holder must provide the document, data or information requested within the timeframe and in the manner specified by the EAO.
- 6.2 The Holder must submit a report to the EAO on the status of compliance with this Certificate at the following times, unless otherwise authorized by the EAO:
- a) At least 30 days prior to the start of Construction;
  - b) On or before March 31 in each year after the start of Construction;
  - c) At least 30 days prior to the start of Operations;
  - d) On or before March 31 in each year after the start of Operations;
  - e) At least 30 days prior to the start of Closure; and

- f) On or before March 31 in each year after the start of Closure until the end of Closure.
- 6.3 The reports referred to in subsection 6.2 must be in a form satisfactory to the EAO. The EAO may adjust or extend the reporting requirement in subsection 6.2 by providing written notice to the Holder.

## **7. Project Status Notification**

- 7.1 The Holder must notify the EAO in writing that the Project is in Construction, Operations, and Closure. The notification must be received by the EAO within 30 days of the commencement of Construction, Operations, and Closure.
- 7.2 The Holder must notify the EAO in writing, within 30 days after the issuance of this Certificate, of the primary contact for the Project and provide the physical address, email address and phone number(s) of the primary contact.
- 7.3 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 name, physical address, e-mail address and phone number(s) of the new primary contact.

## **8. Compliance Notification**

- 8.1 The Holder must notify the EAO Compliance and Enforcement as soon as practicable, and in any event no more than 72 hours, after the Holder determines that the Holder has not, or may not have, fully complied with this Certificate.

## **9. Independent Environmental Monitor**

- 9.1 The Holder must retain an Independent Environmental Monitor (IEM). The IEM role may be fulfilled by one or more individuals. The IEM must be a Qualified Professional with a minimum of five years' experience in monitoring construction, unless otherwise approved by the EAO.
- 9.2 Subject to any exceptions set out in the terms of engagement for the IEM, when providing information or reports to the EAO, the IEM must not provide such information or reports to the Holder in advance of providing such information or reports to the EAO.
- 9.3 The Holder must retain the IEM from the start of Construction until the end of the second year of Operations at the Mine Site Complex.
- 9.4 The Holder must develop the terms of engagement for the IEM in consultation with Participating Indigenous Nations, EMLI, and ENV.
- 9.5 No later than 60 days prior to the planned commencement of Construction, the Holder must:
  - a) Provide to the EAO, for approval, the name, organization and qualifications of the proposed IEM and the IEM terms of engagement; and
  - b) Provide notice to Participating Indigenous Nations of the name, organization and qualifications of the proposed IEM and the IEM terms of engagement.
- 9.6 Prior to a change in the IEM, the Holder must provide the name, organization, and qualifications of the proposed new IEM to:



- a) The EAO for approval; and
  - b) Participating Indigenous Nations for information.
- 9.7 The Holder must not start Construction until the selection of the IEM and the terms of engagement have been approved by the EAO.
- 9.8 The terms of engagement must include, at a minimum, the following:
- a) A requirement for the IEM to undertake the following actions as directed by the EAO:
    - i. Observe, record for, and report to the EAO with respect to the Holder's compliance with this Certificate; and
    - ii. Provide information on compliance to the EAO, Participating Indigenous Nations, ENV, and EMLI.
  - b) The role, responsibilities, and qualifications of the IEM;
  - c) The nature and frequency of monitoring;
  - d) The process whereby the IEM will make recommendations to the Holder to take mitigative or corrective actions to address any non-compliance or potential non-compliance with this Certificate and how the recommendations will be communicated to the EAO;
  - e) Information to be provided to Participating Indigenous Nations;
  - f) The situations in which the IEM has authority from the Holder or under other provincial or federal authorizations to stop work on part or all of the Project if the IEM determines that:
    - i. The Holder has not, or may have not, complied fully with the requirements of this Certificate; and
    - ii. Stopping work is necessary to prevent or reduce Project-related adverse effects as determined by the IEM.
  - g) The process and timing for updating the terms of engagement, including any consultation with agencies and Participating Indigenous Nations that would occur in connection with such updates.
- 9.9 On completion of the phases listed in subsection 9.3, the IEM must submit a Project phase completion report to the EAO. The report(s) must be written by the IEM and must include:
- a) A record of all non-compliances with this Certificate;
  - b) A record of the recommendations made by the IEM to the Holder to prevent or address any non-compliance with this Certificate;
  - c) A record of whether any recommendations from the IEM were implemented and the corresponding outcome of implementation;
  - d) A record of all instances where the IEM required work be stopped for the reasons referred to in paragraph 9.8f;
  - e) Assessment of the effectiveness of the mitigation measures required by the conditions of this Certificate for the phases listed in 9.3; and
  - f) If applicable, recommendations on how to achieve and maintain compliance with the conditions of this Certificate for the next Project phase.

## 10. Construction Environmental Management Plan

- 10.1 The Holder must retain one or more Qualified Professionals to develop a Construction Environmental Management Plan. The plan must be developed in consultation with Participating Indigenous Nations, EMLI, ENV, NHA and MOF.
- 10.2 Following development of the plan, the Holder must provide the plan to the EAO for review a minimum of 60 days prior to the planned commencement of Construction.
- 10.3 The Construction Environmental Management Plan must include at least the following:
- a) How the mitigation measures applicable to Construction in Tables 20.1-2, 20.1-3, 20.1-5, 20.1-7, 20.1-8, 20.1-13, 20.1-14, and 20.1-17 in the Mitigations Table will be implemented.
- 10.4 The Construction Environmental Management Plan must include, at a minimum, how the following will be addressed:
- a) Access management;
  - b) Acid rock drainage and metal leaching management;
  - c) Blasting management;
  - d) Chance finds procedure, including protocols for notifying Participating Indigenous Nations;
  - e) Emergency response;
  - f) Erosion and sediment control;
  - g) Fire suppression;
  - h) Geological and terrain hazards;
  - i) Human-wildlife conflict;
  - j) Invasive plants management;
  - k) Noise management;
  - l) Traffic management;
  - m) Wildlife protection;
  - n) Exposure of Employees to contaminated area;
  - o) Management and any remediation of contaminated soils in Project Footprint, including through water seepage and infiltration;
  - p) Site restoration;
  - q) How biodegradable oils will be used for equipment within 30 metres of a waterbody;
  - r) Vegetation management;
  - s) Surface water and groundwater protection;
  - t) Waste management, including hazardous waste; and
  - u) Spill prevention and response related to hydrocarbon storage and leaks or other accidental emissions from machinery or equipment.
- 10.5 The plan, and any updates made pursuant to subsection 2.2 or paragraph 3.2(h), must be implemented throughout Construction under the direction of a Qualified Professional retained by the Holder and to the satisfaction of the EAO.

## **11. Care and Maintenance Plan**

- 11.1 The Holder must retain a Qualified Professional to develop a plan for Care and Maintenance. The plan must be developed in consultation with Participating Indigenous Nations, EMLI, ENV, NHA, and MOF.
- 11.2 Following development of the plan, the Holder must provide the plan to the EAO for review a minimum of 60 days prior to the planned commencement of Construction, unless otherwise authorized by the EAO.
- 11.3 The plan must include, at a minimum, the means by which the following will be addressed:
- a) Sediment and erosion control;
  - b) Management of ore, water treatment sludge, excess accumulation of water, tailings, and waste rock;
  - c) Building maintenance;
  - d) Measures and modelling needed to return to operations following any period of care and maintenance that is longer than one year;
  - e) Measures to monitor and mitigate adverse effects to human health, wildlife, fish, aquatic resources, water quality, and air quality;
  - f) Access management; and
  - g) Spill prevention and response for hydrocarbon storage and leaks or other accidental emissions from machinery or equipment
- 11.4 The plan must include a description of how each condition in this Certificate would 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.
- 11.5 The plan has no effect until approved by the EAO.
- 11.6 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 90 days after Construction or Operations ceased.
- 11.7 The plan, and any updates made pursuant to subsection 2.2 or paragraph 3.2(h), must be implemented during Care and Maintenance under the direction of a Qualified Professional retained by the Holder and to the satisfaction of the EAO.
- 11.8 To the extent there is a conflict between the plan, as approved by the EAO, and the conditions in this Certificate, the plan applies.

## **12. Public Information**

- 12.1 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 12.2 available to the public without tracking of users' personal identity or the need for registration, credentials, or payment.
- 12.2 The Holder must include the following information on the website or alternative online medium:
- a) A copy of the current version of this Certificate and any 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) Reporting annually on the status of monitoring programs and the results of monitoring activities required by conditions of this Certificate, including a plain language summary and a map showing monitoring locations, unless otherwise authorized by the EAO;
- f) A description of how to submit questions or concerns about the Project to the Holder, including options for anonymous submissions and self-identification as Indigenous, and a description of how personally-identifying information for any person submitting a comment will be kept confidential;
- g) Information on how to report concerns to appropriate regulatory authorities, including at least EAO Compliance and Enforcement, potential health hazards under the *Public Health Act* to NHA, and the Report All Poachers and Polluters program;
- h) The means by which, including estimated response time and options for preferred response method, the Holder will respond to any questions or concerns submitted about the Project, and if applicable, including the Holder's rationale if not addressing concerns;
- i) The number and summary of written comments and issues submitted through the community feedback process in (f) or other engagement activities of the Holder;
- j) Current versions of all plans required to be provided to the EAO through this Certificate, unless otherwise authorized by the EAO;
- k) Notice of any community meetings or other public engagement opportunities for the public or land users in addition to other forms of advertising (newspaper, radio, or social media) for the public engagement opportunities;
- l) Health-related and safety information related to the Project for the public and Employees;
- m) A description of how the Holder has engaged and notified property owners and non-tenured land users within the local assessment area for land and resources use, as described in Table 7.11-14 of the Application, about location and timing of Project activities; and
- n) Description of planned activities related to each Project phase including, as applicable, the anticipated timing, duration, and type of disturbance.

12.3 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 updated at least quarterly, unless otherwise authorized by the EAO.

### **13. Environmental Effects Management Plan**

13.1 The Holder must retain one or more Qualified Professionals to develop a plan for the management of adverse Project effects to the environment, including non-caribou wildlife and vegetation. **Where monitoring is required, trigger-response actions (Condition 4) must be included.** The plan must be developed in consultation with Participating Indigenous Nations, EMLI, ENV, WLRS, and MOF.

13.2 Following development of the plan, the Holder must provide the plan to the EAO for review a minimum of 90 days prior to the planned commencement of Construction, unless otherwise authorized by the EAO.

13.3 The plan must include at least the following:

- a) How the mitigation measures in Tables 20.1-6 (vegetation) and 20.1-7 (non-caribou wildlife) in the Mitigations Table will be implemented;
- b) Results of pre-construction surveys for wildlife habitat features and the associated avoidance, mitigation, or offsetting measures to be undertaken where wildlife habitat features are found in the Project Surface Footprint, including for at least: snake hibernacula, mineral licks for ungulates, bird nests, bat hibernacula and bat roosting habitat;
- c) Results of pre-construction surveys for whitebark pine and the associated avoidance or mitigation measures to be undertaken if whitebark pine is found in the Project Surface Footprint;
- d) How human-wildlife conflict and wildlife-vehicle collisions will be monitored, recorded, and reported annually, including any additional mitigation measures proposed based on the monitoring results;
- e) How seasonal emergence counts for bats and sound and vibration monitoring at bat hibernacula in and within 400 metres of the Project Surface Footprint will be conducted;
- f) If the human-made structures used by bats as hibernacula become unstable, how a longevity prognosis will be developed in consultation with MOF or WLRS;
- g) How any decommissioning of buildings/structures will be assessed for use as habitat by bats prior to disturbance, and that this disturbance must occur outside of hibernation and roosting timing windows for bats, and a habitat compensation strategy for any removal of bat hibernacula;
- h) How tree clearing will occur outside of roosting timing window for bats and the nesting window for birds or, if this is not always possible, the additional mitigation measures that will occur;
- i) How light and noise disturbance from the Project at the Island Mountain portal will be reduced to address disturbance to bats;
- j) How bats will be discouraged from entering in and roosting in newly constructed portals and the Cow Portal;
- k) How any artificial winter bat hibernacula, if created, will be monitored;
- l) Mitigation measures for reducing attractants for scavengers in the Project Area;
- m) Mitigation measures to reduce harm to wildlife from coming into contact with holding ponds, sumps, or other waterbodies created by the Project, including but not limited to, the risk to wildlife from uptake of contaminants, and methods to prevent wildlife access to these areas to prevent entrapment in Project infrastructure;
- n) How monitoring of any artificial fisher denning structures used will occur;
- o) How vegetation cover for fisher along the transmission line corridor will be maintained;
- p) Where an active fisher den or resting tree is identified, the Holder must implement mitigation measures including establishing a no-work zone 3 hectares in size encompassing the identified habitat feature, not carry out forestry activities within 500 metres of a den during the critical breeding season of March 1 to June 15,

implement an access management plan, and reduce attractants to reduce mortality to predators such as fisher;

- q) A list of valued plant species identified by the Participating Indigenous Nations in the Project local assessment area and any mitigation measures required as determined by a Qualified Professional related to the identified plant species;
- r) Mitigation measures for protection of berry picking areas if identified by Lhtako Dené Nation to the Holder along 500 Nyland Forest Service Road;
- s) The Holder's issue resolution protocol for addressing potential dust-related impacts, including additional mitigation measures in consultation with Lhtako Dené Nation, for any berry harvesting areas identified;
- t) A collection and transplantation plan, as appropriate as determined by a Qualified Professional, for provincially red- or blue- listed plant species of concern identified during pre-construction surveys, if removal cannot be avoided;
- u) A determination of the need for wetland functional assessments and, if these are required as determined by a Qualified Professional, the results of the wetland functional assessments;
- v) A habitat compensation strategy, if required as determined by a Qualified Professional, for western toad based on the removal of western toad breeding wetland habitat for the Project;
- w) How monitoring and consideration of design for amphibians where erosion fencing is used will be implemented; and
- x) Follow up programs that will be implemented to assess the effectiveness of any fencing and culvert crossing structures.

13.4 Reporting of results of all monitoring listed in this plan must occur at least annually and be provided to the EAO, EMLI, WLRS, and Participating Indigenous Nations.

13.5 The plan, and any updates made pursuant to subsection 2.2 or paragraph 3.2(h), must be implemented throughout Construction, Operations, and Closure under the direction of a Qualified Professional retained by the Holder and to the satisfaction of the EAO.

## **14. Caribou Mitigation and Monitoring Plan**

14.1 The Holder must retain a Qualified Professional to develop a plan for the management of adverse Project effects to woodland caribou. The plan must be developed in consultation with Participating Indigenous Nations, EMLI, MOF, and WLRS.

14.2 Following development of the plan, the Holder must provide the plan to the EAO, for review a minimum of 90 days prior to the planned commencement of Construction, unless otherwise authorized by the EAO.

14.3 The plan must include at least the following:

- a) How the mitigation measures in Table 20.1-7 (caribou) in the Mitigations Table will be implemented;
- b) How the Operational Restoration Framework – Woodland Caribou Habitat Restoration in British Columbia (2021, or as updated or replaced from time to time) was considered in the development of this plan;
- c) How this plan is consistent with Woodland Caribou Plans for the Barkerville and Wells Gray North Subpopulations (Provincial Caribou Recovery Program herd

plan, or as updated or replaced from time to time) and supports the recovery of this species;

- d) Commitments to the following mitigation measures:
  - i. The transmission line must be decommissioned and removed at the end of Closure, to limit the duration of the impact to caribou;
  - ii. The Holder must not conduct aerial wildlife surveys within the Barkerville caribou herd boundary for the purposes of monitoring related to the Project; and
  - iii. The Holder must not use grass seeding in the transmission line corridor within the Barkerville caribou herd boundary unless required for erosion protection.
- e) Additional mitigation measures required within the Barkerville Caribou Herd boundary during the caribou calving period;
- f) The total area of removal and disturbance of caribou habitat within the Barkerville Caribou Herd boundary and a habitat compensation strategy for caribou based on this total area;
- g) Mitigation measures to discourage access and reduce sight lines and movement for predators and recreational users along the transmission line corridor within the Barkerville Caribou Herd boundary;
- h) How access will be managed for any areas in the transmission line corridor that fall into the existing snowmobile closures;
- i) Results of pre-construction surveys for mineral licks and other habitat features used by caribou and the associated avoidance, mitigation, or offsetting measures to be undertaken for each mineral lick and habitat feature identified; and
- j) How timing of clearing and maintenance of the transmission line corridor will account for caribou life cycles and movements.

14.4 The plan, and any updates made pursuant to subsection 2.2 or paragraph 3.2(h), must be implemented throughout Construction, Operations, and Closure under the direction of a Qualified Professional retained by the Holder and to the satisfaction of the EAO.

## **15. Air Quality**

15.1 The Holder must implement the mitigation measures related to air quality in Table 20.1-1 in the Mitigations Table.

15.2 The following mitigation measures must be implemented, or an acceptable rationale for where and when these mitigation measures will not be used must be developed in consultation with ENV, Participating Indigenous Nations, the District of Wells, and then provided to the EAO:

- a) Use of equipment which limits emissions of nitrogen oxides;
- b) Use of electrified vehicles and equipment on site;
- c) Reduction or restriction of use of sources of nitrogen dioxide and fine particulate matter such as gas fired heaters and other combustion sources following completion of the transmission line; and
- d) Conducting surface blasting when meteorological conditions support good contaminant dispersion.

15.3 The Holder must conduct continuous air quality and meteorological monitoring for particulate matter (both 2.5 and 10 µm), carbon monoxide, sulphur dioxide, and nitrogen

dioxide in the District of Wells for one full, valid year prior to Operations and prior to Construction at the Mine Site Complex and during Construction, Operations, and Closure. This monitoring must use methods defined in the B.C. Field Sampling Manual (2020, or as updated or replaced from time to time) and use locations and types of equipment developed in consultation with ENV, Participating Indigenous Nations, and the District of Wells.

15.4 The Holder must report on the monitoring in 15.3 at least twice annually for the first two years of Operations at the Mine Site Complex and at least annually following, unless otherwise authorized by the EAO, including a plain language summary, and provide publicly through condition 12 (Public Information). These reports must also include the monitoring results interpreted and compared against the current B.C. Air Quality Objectives and/or Canadian Ambient Air Quality Standards, where applicable.

15.5 All mitigation measures, monitoring, rationale, and reporting in this condition must be implemented throughout Construction, Operations, and Closure under the direction of a Qualified Professional retained by the Holder and to the satisfaction of the EAO.

## **16. Community Effects Management Plan**

16.1 The Holder must retain one or more Qualified Persons with a minimum of five years of relevant experience in the identification and management of socioeconomic effects associated with industrial projects in rural or remote communities, unless otherwise authorized by the EAO, to develop a plan to adaptively monitor and mitigate socioeconomic effects of the Project. The plan must be developed in consultation with Participating Indigenous Nations, NHA, Interior Health, EMLI, and the District of Wells.

16.2 Following development of the plan, the Holder must provide the plan to the EAO for review a minimum of 60 days prior to the planned commencement of Construction, unless otherwise authorized by the EAO.

16.3 The plan must include at least the following:

- a) How the mitigation measures in Tables 20.1-2, 20.1-9, 20.1-10, 20.1-11, 20.1-12 (Section 7.14), 20.1-16, 20.1-18, 20.1-19, and 20.1-20 in the Mitigations Table will be implemented;

### *Employees*

- b) A description of policies and training to be implemented pertaining to workplace code of conduct/ethics, cultural sensitivity, drug and alcohol use, respectful workplace, and workplace violence (including gender-based violence), including the opportunity for the public to provide input to the policies and training;
- c) How Employees will be moved to site, including by shuttle bus, personal vehicle, or other method;
- d) Commitment to the following:
  - i. The corporate code of conduct and relevant Employee accommodation policies described in (b) must apply to all Employees while on shift, including off duty; and
  - ii. Training for onboarding new Employees must be informed by engagement with Participating Indigenous Nations and NHA.



- e) Annual employment reporting during Construction and the first five years of Operations, reported annually in quarterly intervals and including projections. These reports will include non-confidential information pertaining to the labour force, specifically:
  - i. The number of people working (direct and contracted) and the type of position they hold;
  - ii. Voluntarily provided identity factors, such as gender and ethnicity;
  - iii. The home location (town or city) of Employees; and
  - iv. Accommodation type of each Employee (if non-local).
- f) How the Holder will implement a policy aimed to prevent non-local Employees from engaging in recreational hunting and fishing and ATV and snowmobile use during their rotation shift, including off-duty;
- g) How the Holder will implement its objectives to hire at least 75 percent of the Project workforce from the Cariboo Regional District and Fraser Fort George Regional District, if people are qualified and available;
- h) Description of gender equity and diversity employment measures and practices to be implemented;
- i) An Employee accommodation strategy, which will include at least the following:
  - i. Estimates on the number of Employees and families that are expected to immigrate into Wells and Quesnel, their expected demographics, and how Employee accommodations will be managed and overseen. These estimates must be specific to Wells and Quesnel and broken down by local, new-to-area-temporary, and new-to-area-permanent;
  - ii. Descriptions of Construction and Operations work camp and Employee accommodation policies, camp and Employee accommodation design and capacity, monthly camp and Employee accommodation utilization, Employee transportation, Employee eligibility criteria of residing at work camp or other accommodation, Employee schedules, personal and commercial vehicle parking, and camp and Employee accommodation amenities;
  - iii. The estimates in (i) must be reviewed, and if required, updated at 1 year, 6 months and 3 months prior to Construction, or unless otherwise authorized by the EAO;
  - iv. How actual numbers for the estimates in (i) will be reported to the EAO and NHA bi-annually throughout Construction and annually throughout Operations or when an influx of Employees is anticipated;
  - v. Local accommodation for Employees during Construction of the Mine Site work camp must be offered to Employees by the Holder within existing work camps or other temporary accommodations owned by the Holder and does not include rental of local accommodation;
  - vi. Measures to minimize rental of local housing by direct Employees of the Holder during Construction and Operations;
  - vii. How this strategy considers and manages impacts of the pressure to local housing and rental markets;
  - viii. How this strategy considers and mitigates impacts to diverse groups and those that may be affected disproportionately;

- ix. How this strategy will be monitored and evaluated for its effectiveness on an ongoing basis to verify that it aligns with the predictions provided in the Application;
  - x. How this strategy was developed and implemented with the consultation of local community, service providers and diverse groups; and
  - xi. How this information will be reported out to affected stakeholders, service providers and community representatives.
- j) Employment, training, and recruitment mechanisms that aim to address barriers to employment, including childcare, and support transferable skills development;
  - k) Mitigation measures including but not limited to training to support re-employment during temporary and permanent Project closures;

*Traffic*

- l) A plan for traffic control during Operations;
- m) A commitment to a maximum of 25 haul truck round-trips on Highway 26 per day;

*Public*

- n) How the Holder will establish and chair at least quarterly (or as otherwise authorized by the EAO) community meetings for the first year of Construction and first year of Operations, then at least bi-annually (or as otherwise authorized by the EAO) throughout the remainder of Construction and Operations for the purpose of discussion on effects from the Project in the local area, mitigation measures to address social and economic effects, future project development plans, and the Community Effects Management Plan and its implementation;
- o) How the Holder will engage with the public, Participating Indigenous Nations, local governments, and infrastructure and service providers regarding Project activities and actions related to the implementation of mitigation measures;
- p) How monitoring for effects on and the effectiveness of mitigation measures for diverse groups will be conducted;
- q) The process, including response times, for which concerns from the public, including those raised through condition 12.2f, regarding the Project will be responded to, communicated at the community meetings in (n) and reported on the public website;
- r) The terms of the Holder's financial contributions towards:
  - i. A community liaison position in the community during Construction and Operations with the objective of reviewing documentation, reflecting the community's concerns, and participating in the community meetings in (n), or as otherwise authorized by the EAO;
  - ii. A mental health support worker position in the District of Wells and the City of Quesnel during Construction and Operations with the objective of helping to address Project impacts, including to mental health, or as otherwise authorized by the EAO; and
  - iii. The Quesnel Women Resource Centre with the objective of helping to address any Project contributions to domestic violence, sexual exploitation, and abuse issues as well as consideration for Project impacts that may be limiting individuals from all groups, including diverse

- groups, from participating in Project employment opportunities, or as otherwise authorized by the EAO;
- s) Description of communication and engagement processes with Participating Indigenous Nations, NHA, and District of Wells during all Project phases regarding Project activities and updates, as well as Project-related social and economic issues or concerns, including noise;
  - t) A Community Emergency Response Plan related to the Project, including:
    - i. The roles, responsibilities and capacity of different emergency response parties and infrastructure during emergencies related to the Project, including how the Holder will work with these different parties to develop joint response strategies to respond to incidents in the area;
    - ii. The stakeholders, contact information and communications protocols, including timing and early notification to Health Emergency Management BC regarding emergency preparedness and response, informed by NHA Emergency Roles & Responsibilities (2022, or as updated or replaced from time to time);
    - iii. A hazard assessment that identifies industry and Project-specific hazards that may require specialized equipment, services, expertise, or capacities among service providers;
    - iv. Worst-case event casualty and injury, including type and estimates;
    - v. An evaluation of the limitations of emergency services in the District of Wells and the effects of the events in (ii) on those services;
    - vi. An evaluation of evacuation procedures for the community and the Project's workforce and procedures for notifications; and
    - vii. Identification of the scenarios in which the Holder would undertake or fund additional health impact assessment studies (or human health risk assessments) for Project-related incidents to inform appropriate health and social service response if requested by NHA or Interior Health.
  - u) Mitigation measures that would mitigate impacts to emergency response to/from the District of Wells and Barkerville Historic Site and evacuation procedures.

#### *Noise*

- v) A plan for limiting noise impacts, developed by a Qualified Professional, including at least:
  - i. The Holder must measure ambient baseline noise, which is not influenced by the Holders' exploration or Project activities, prior to Construction;
  - ii. A maximum equivalent sound level of 40 dBA of Project noise contribution at the nearest Dwelling and downwind sound locations to the Mine Site for average noise over a one-hour period, or as otherwise authorized by the EAO;
  - iii. The methods by which the Project noise contribution will be continuously monitored at multiple monitoring locations, including downwind within residential areas, during Construction and Operations;
  - iv. Mitigation measures for noise at the work camp, including a process for receiving and responding to complaints from Employees in the camp and the public; and

- v. Any blasting during Construction or Operations must be conducted between 0600 and 1800 hours.

#### *Visual Impacts*

- w) How the Mine Site Complex building and transmission line poles will be screened from specific viewpoints with vegetation or rationale provided for where this is not possible;
- x) How light pollution from Project infrastructure will be measured, monitored, and mitigated in the District of Wells; and
- y) How emission of light towards the sky from lighting at the Mine Site Complex will be reduced by using lighting that produce a low and uniform lighting that would meet operational lighting needs and will not exceed angles above 90 degrees.

16.4 The plan, and any updates made pursuant to subsection 2.2 or paragraph 3.2(h), must be implemented throughout Construction, Operations, and Closure under the direction of a Qualified Person retained by the Holder and to the satisfaction of the EAO.

## **17. Health and Medical Services Plan**

17.1 The Holder must retain a Qualified Person with a minimum of five years' experience in the planning and delivery of health care services in rural or remote communities, unless otherwise authorized by the EAO, to develop a plan for the development and delivery of health and medical services to Employees (both residing locally and in camp) and their families (if staying locally temporarily while Employee is on shift). The plan must be developed in consultation with NHA, the B.C. Ambulance Service, and Participating Indigenous Nations.

17.2 Following development of the plan, the Holder must provide the plan to the EAO for review a minimum of 90 days prior to the planned commencement of Construction, unless otherwise authorized by the EAO.

17.3 The plan must include at least the following:

- a) Identification of how the guidance from "Health and Medical Services Plan Best Management Guide for Industrial Camps" (NHA, March 2015, or as updated or replaced from time to time), "Communicable Disease Management guide: Best Practices for Industrial Work Settings" (NHA, 2023, or as updated and replaced from time to time), and "Health and Safety During the Opioid Overdose Emergency: Northern Health's Recommendations for Industrial Camps" (NHA, 2018, or as updated and replaced from time to time) has been incorporated into the plan and a rationale for any guidance from these documents not incorporated;
- b) Identification of how guidance and relevant reports from B.C. Indigenous Nations' health departments has been incorporated into the plan and a rationale for any guidance from these documents not incorporated;
- c) The means by which the Holder will minimize impacts to local non-urgent care services including by encouraging Employees to seek medical care in their home communities or through Holder-provided medical services;
- d) A description of:
  - i. On-site health and medical services to be implemented by the Holder to meet the workforce's urgent and non-urgent health care needs, including

a clear and demonstrably effective system whereby health service provision is scaled relative to the fluctuation of the workforce, informed by the Employee accommodation strategy in 16.3i and local health service capacities, including at least:

- A) Primary care services;
  - B) Public health services, inclusive of disease and infection prevention and outbreak protocols; and
  - C) Health promotion and Employee wellness programs (including but not limited to physical infrastructure, amenities, services, and activities that support physical and mental well-being).
- e) A communication strategy between the Holder and health service providers including NHA and BC Ambulance Services on matters including, but not limited to, patient care and transfer, data collection and reporting;
- f) Health reporting quarterly during Construction and annually for the first five years of Operations, including information pertaining to the following for Project personnel:
- i. Observational information, where provided from NHA, on the management of health and medical services pressures;
  - ii. Number of Employee presentations to site-based or camp-based clinic or aid stations or virtual clinics provided by the Holder;
  - iii. Project referrals and transfers, including type and number, to non-Project health care practitioners or services; and
  - iv. Other indicators of use of health services by Employees during Construction and Operations, if requested by NHA and approved by the EAO.
- g) A description of how this plan relates to the Community Effects Management Plan (condition 16).

17.4 The plan, and any updates made pursuant to subsection 2.2 or paragraph 3.2(h), must be implemented throughout Construction, Operations, and Closure under the direction of a Qualified Person retained by the Holder and to the satisfaction of the EAO.

## **18. Drinking Water and Water Treatment Plan**

18.1 The Holder must retain one or more Qualified Professionals with a minimum of five years' experience (or as otherwise authorized by the EAO) in drinking water quality and hydrogeology to develop a plan to manage effects of the Project to drinking water in Wells. The plan must be developed in consultation with Participating Indigenous Nations, NHA, ENV, EMLI, MOF's Crown Contaminated Sites Program, and the District of Wells.

18.2 Following development of the plan, the Holder must provide the plan to the EAO for review a minimum of 60 days prior to the planned commencement of Operations at the Mine Site Complex, unless otherwise authorized by the EAO.

18.3 The plan must include at least the following:

- a) How the mitigation measures in Table 20.1-4 in the Mitigations Table will be implemented;

- b) Identify the approach for identification and development of a new drinking water supply source (groundwater or surface water) for the District of Wells prior to Closure;
- c) If a new drinking water supply source in (b) is found, a description of the feasibility and source water assessment that will be undertaken for the new drinking water source (including location, quantity, quality, and any recommended treatment needed), including any potential increased risks of existing lead levels in pipes;
- d) If substantial investigative work is unable to identify a new drinking water supply source in (b), the Holder must:
  - i. Report the results of the investigative work and rationale to the District of Wells, EAO, and NHA;
  - ii. Develop a treatment plan, if required, or provide an alternative mitigative plan, to address Project effects on groundwater quality at the District of Wells water supply well throughout Operations, Closure, and post Closure; and
  - iii. Update the human health risk assessment in the Application based on this addition of the groundwater pathway in this assessment.
- e) How the Holder will determine the type of water treatment technology and duration needed for water treatment post Closure;
- f) The process for identification of a drinking water source for the Mine Site Complex and Mine Site work camp prior to Operations at the Mine Site Complex, including a description of the feasibility and source water assessment that will be undertaken for the new drinking water source;
- g) How a hydrogeological assessment (field work and/or modelling) will be completed to identify if and to what extent any of the new drinking water sources will result in changes in groundwater flow and groundwater quality, including any potential to alter groundwater flow regimes and/or contaminant mobilization related to the existing contaminated area and change any predictions, assumptions or conclusions made in the Application, and how any changes found will be monitored and mitigated;
- h) How the Holder will provide information to the District of Wells regarding the water quality of drinking water generally in the District of Wells, including use of wells not connected to the municipal water supply, related to the influence of Project activities with historical and current contamination;
- i) How the Holder will share any groundwater quality information collected with the District of Wells, ENV, NHA, Participating Indigenous Nations, and the public; and
- j) How recommendations will be provided to the District of Wells regarding signage for potability of surface water sources.

18.4 The plan, and any updates made pursuant to subsection 2.2 or paragraph 3.2(h), must be implemented throughout Operations, and Closure, and post Closure under the direction of a Qualified Professional retained by the Holder and to the satisfaction of the EAO.

## **19. Human Health Monitoring and Management Plan**

19.1 The Holder must retain one or more Qualified Persons with experience in the appropriate specialties to develop a plan to monitor environmental contaminants with

the potential to impact human health (including for work camp residents, residents of Wells, and local land users) and establish triggers that would initiate additional mitigation measures, notifications and/or additional actions. The plan must be developed in consultation with EMLI, ENV, NHA, and Participating Indigenous Nations.

19.2 Following development of the plan, the Holder must provide the plan to the EAO for review a minimum of 60 days prior to the planned commencement of Construction, unless otherwise authorized by the EAO.

19.3 The plan must include at least the following:

- a) Baseline health risk conditions and hazard quotients for contaminants listed in b) (i);
- b) Identification of a sampling and monitoring plan for the Project that must include at least:
  - i. The following substances, media, and additional sampling parameters, as well as any other Criteria Air Contaminant, Contaminant of Potential Concern, media, or parameter identified by the Qualified Person as necessary to determine the human health effects of the Project, in consultation with EMLI, ENV, NHA, and Participating Indigenous Nations:
    - A) Continuous monitoring for particulate matter (both 2.5 and 10 µm), sulphur dioxide, and nitrogen dioxide in air;
    - B) Time-integrated sampling for polycyclic aromatic hydrocarbons in air and grab samples of soil and water;
    - C) Continuous monitoring for meteorological parameters (including wind speed, wind direction, relative humidity, and temperature);
    - D) Time-integrated sampling for metals (including but not limited to antimony, aluminum, arsenic, cadmium, chromium, cobalt, copper, iron, lead, manganese, mercury, nickel, and selenium) in air (bound to particulate matter) and grab samples of soil, vegetation (including in natural environments and within the town of Wells), fish, surface water, and the community water supply or groundwater; and
    - E) Grab samples for cyanide in water, sediment, and soil;
  - ii. Sampling locations for the parameters identified in (i) including reference sites that are not impacted by the Project and co-location, as applicable, of:
    - A) Soil samples with vegetation samples; and
    - B) Fish samples with water quality samples;
  - iii. Detection limits that are sufficient to compare to human health thresholds and triggers outlined in subsection 19.3(c); and
  - iv. Sampling methods following the B.C Field Sampling Manual (2020, or as updated or replaced from time to time) including quality assurance and quality control measures and sampling frequency and the rationale for this chosen frequency.
- c) Establishment of triggers for the substances in the environmental media listed in (b) that, when exceeded, would trigger notification to NHA and/or Interior Health, additional risk characterization, monitoring or mitigation, adaptive management, public risk communication including the provision of consumption advice and the

means and timing by which risk communication and/or consumption advice would be provided, unless otherwise authorized by the EAO. These triggers must be informed by assumptions, uncertainty, and conclusions in the Application's final human health risk assessment, including the site-specific hazard quotients/risk thresholds, available health-based guidelines or standards, health-based environmental quality guidelines, and/or best available epidemiological information;

- d) The means by which the Holder will, in consultation with Participating Indigenous Nations, incorporate specific measures to ensure that the sampling plan is culturally appropriate and identify sampling locations and species of country foods for each substance in (a) that is representative of Participating Indigenous Nations' use and consumption;
- e) The means by which the Holder will share information and consult with MOF's Crown Contaminated Sites Program, Participating Indigenous Nations, the District of Wells, EMLI, ENV, and NHA, including the interpretation of measured concentrations into health risks; and
- f) A description of how this plan relates to the Drinking Water and Water Treatment Plan (condition 18), Air Quality (condition 15), and Community Effects Management Plan (condition 16) required by this Certificate and the regulatory requirements of the Project.

19.4 The information collected must be provided annually, reported in quarterly intervals where available, during Construction, Operations and Closure, where available, in a report to the EAO, EMLI, ENV, NHA, and Participating Indigenous Nations. The report must include at a minimum:

- a) Interpretation of the collected data (including data quality and completeness) as it relates to human health, including a discussion of whether the data indicates that any triggers identified in subsection 19.3c are exceeded;
- b) A comparison of results between the human health risk assessment in the Application and the results in the report; and
- c) All additional mitigation or adaptive management measures undertaken by the Holder in response to information obtained through the implementation of the plan or proposed to be undertaken, including when the measures will be implemented.

19.5 The plan, and any updates made pursuant to subsection 2.2 or paragraph 3.2(h), must be implemented throughout Construction, Operations, and Closure under the direction of a Qualified Person retained by the Holder and to the satisfaction of the EAO.

## **20. End Land Use Plan**

20.1 The Holder must retain a Qualified Professional to develop an End Land Use Plan, consistent with Section 10 of the Health, Safety and Reclamation Code for Mines in British Columbia (2021, or as updated or replaced from time to time) at a minimum, for all disturbance areas within the Project Surface Footprint. The plan must be developed in consultation with Participating Indigenous Nations, EMLI, ENV, NHA, and MOF. This plan is intended to complement and inform any reclamation plans that are submitted and implemented pursuant to the *Mines Act* requirements.



20.2 Following development of the plan, the Holder must provide the plan to the EAO for review a minimum of 60 days prior to the planned commencement of Construction, unless otherwise authorized by the EAO.

20.3 The plan must include at least the following:

- a) A definition and description of the pre-mining land capability and land use conditions, using maps and tabular inventories, with respect to ecosystems and habitats and other uses in the area of the Project Surface Footprint, including the condition of the contaminated area within the Surface Footprint and excavation area prior to Construction;
- b) A definition and description of the predicted post Closure land capability and land use conditions based on changes that are expected to occur to topography and soil conditions due to Project development, using maps and tabular inventories, with respect to ecosystems and habitats, and other uses for the Project Surface Footprint;
- c) Modelling, or other planning exercises, to reconcile or minimize negative differences or enhance positive benefits between the pre-Project conditions (as per paragraph a) and post-Project projections (as per paragraph b) accounting for, but not limited to, Project design, terrain profiling and contouring, and optimization of soil conditions, including of the contaminated area within the Project Surface Footprint and excavation area;
- d) Documentation of the forecasted net changes in land capability between pre- and post-mining conditions;
- e) Incorporation of mitigation targets related to valued components examined in the Application, including but not limited to wildlife and wildlife habitat, human health, vegetation, and ecosystems;
- f) How the plan will incorporate the caribou mitigation in condition 14 (Caribou Mitigation and Monitoring Plan), the wildlife mitigation in condition 13 (Environmental Effects Management Plan) and the wetland functional assessments in condition 13; and
- g) How the Holder will contribute towards remediation of the contaminated area within the Project Surface Footprint and excavation area, including by implementing any agreements with EMLI, MOF, ENV, NHA, or any other party involved in the regulation of the contaminated area within the Project Surface Footprint and excavation area.

20.4 The plan, and any updates made pursuant to subsection 2.2 or paragraph 3.2(h), must be implemented throughout all Project phases under the direction of a Qualified Professional retained by the Holder and to the satisfaction of the EAO.

## **21. Greenhouse Gas Reduction Plan**

21.1 The Holder must retain a Qualified Person to develop a plan to manage greenhouse gas (GHG) emissions from the Project during Operations and Closure. The emissions include direct Project emissions as well as indirect (reasonably attributable to the Project) emissions within B.C. The plan must be prepared in consultation with the Climate Action Secretariat, Participating Indigenous Nations, and EMLI.

21.2 Following development of the plan, the Holder must provide the plan to the EAO for review a minimum of 60 days prior to the planned commencement of Operations, unless

otherwise authorized by the EAO. The Holder must provide no less than 30 days for parties to provide views on the plan.

21.3 The plan must include at least the following:

- a) How the mitigation measures in Section 8.0 of the Mitigations Table will be implemented;
- b) Consideration of recent climate change data and depiction of the Project's impacts on climate change;
- c) An estimation of the projected annual direct and indirect GHG emissions, total direct and indirect GHG emissions for Operations and direct and indirect GHG emissions over the Project's lifetime. The estimated direct and indirect Project GHG emissions must be equal to or lower than the estimates provided in Table 8.2-1 of the Application;
- d) An analysis of best available technologies and processes to minimize GHG emissions, including the technical and economic feasibility of GHG reductions;
- e) An explanation for the technologies and measures that the Holder intends to implement and by when, as well as technologies and measures not implemented with rationale;
- f) Consideration of emission reduction targets and schedules as set out in relevant Provincial statutes and supporting policies; and
- g) A summary of how the Holder will achieve emission reduction targets and schedules in (f) by 2050 if the Project is operational in 2050 and beyond.

21.4 The plan must be updated in consultation with Participating Indigenous Nations, Climate Action Secretariat, and EMLI at least once every five years from the planned commencement of Operations, unless otherwise authorized by the EAO.

21.5 The plan, and any updates made pursuant to subsection 2.2 or paragraph 3.2(h), must be implemented throughout Operations, and Closure under the direction of a Qualified Person retained by the Holder and to the satisfaction of the EAO.

## **22. Aquatic Effects Monitoring Plan**

22.1 The Holder must retain one or more Qualified Professionals to develop a plan for the management of adverse Project effects to the aquatic environment at each of the Mine Site, Bonanza Ledge Site, and the QR Mill. The plan must be developed in consultation with Participating Indigenous Nations, ENV, WLRS, and MOF.

22.2 Following development of the plan, the Holder must provide the plan to the EAO for review a minimum of 90 days prior to the planned commencement of Construction, unless otherwise authorized by the EAO.

22.3 The plan must include at least the following:

- a) A conceptual site model to visually represent (e.g., using a box and line diagram) the potential interactions between the proposed Project activities and the biophysical components of and relating to the aquatic environment;
- b) A summary of the mitigation measures proposed in any aquatic-related management plans and permit requirements that aim to ensure the Project does not cause receiving environment water quality changes that result in negative

- impacts on the overall health of the aquatic ecosystem, including fish health, fish reproduction, and benthic invertebrate communities based on sampling in (c); and
- c) A description of the locations, sample sizes, methods, and timing and frequency of sampling for each measurement endpoint and metric including, but not limited to:
- i. Surface water chemistry and toxicity;
  - ii. Sediment chemistry and toxicity;
  - iii. Tissue chemistry (at minimum for benthic invertebrates and fish as applicable);
  - iv. Periphyton or phytoplankton, as applicable;
  - v. Aquatic invertebrate (including benthic invertebrates or zooplankton, as applicable) communities;
  - vi. Fish communities; and
  - vii. Fish health metrics and observations.

22.4 Reporting of results of all monitoring in this plan must occur at least annually or at the same frequency as an aquatic effects management plan required by an *Environmental Management Act* permit for the Project and be provided to the EAO, ENV, WLRS, MOF, and Participating Indigenous Nations.

22.5 The plan, and any updates made pursuant to subsection 2.2 or paragraph 3.2(h), must be implemented throughout Construction and Operations or for the same duration as an aquatic effects management plan required by an *Environmental Management Act* permit for the Project under the direction of a Qualified Professional retained by the Holder and to the satisfaction of the EAO.