

Assessment of an Application for Certificate Amendment Amendment #5 - Work Camp Expansion 2

RED CHRIS PORPHYRY COPPER-GOLD MINE

REQUESTED BY:

NEWCREST RED CHRIS MINING LIMITED

NOVEMBER 7, 2023

Pursuant to Section 32 of the Environmental Assessment Act, S.B.C. 2018, c.51



EAO

Environmental
Assessment Office

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ACRONYMS AND ABBREVIATIONS

Act	<i>Environmental Assessment Act</i> , S.B.C. 2018, c. 51
Amendment	The proposed fifth amendment to Environmental Assessment Certificate #M05-02, which proposes to increase maximum on-site camp accommodation to 1,200 people
Amendment Application	The application submitted by Newcrest to amend the Environmental Assessment Certificate #M05-02 to increase total camp accommodation to up to 1,200 people
Block Cave Amendment	A proposed, forthcoming amendment to transition the Red Chris Mine from open pit to underground mining
Certificate	Environmental Assessment Certificate
EAO	Environmental Assessment Office
EMLI	Ministry of Energy, Mines and Low Carbon Innovation
ENV	Ministry of Environment and Climate Change Strategy
FIFO	Fly-in, fly-out
Newcrest	Newcrest Red Chris Mining Limited
Participating Indigenous Nation	An Indigenous nation that is potentially affected by the Amendment and is afforded specific procedural rights during the Amendment Assessment; in this case, Tahltan Nation
Red Chris Mine	Red Chris Porphyry Copper-Gold Mine
TAC	Technical Advisory Committee
Valued Component	Components of the biophysical and human environment that are considered by the public, Indigenous nations, the proponent, government agencies, or scientists and other technical specialists involved in the environmental assessment process to have scientific, ecological, economic, social, cultural, archeological, historical, or other importance.

1.0 OVERVIEW OF PROPOSED AMENDMENT

1.1. Background

The Red Chris Porphyry Copper-Gold Mine (Red Chris Mine) is an existing open pit copper-gold mine and mill located in northwest British Columbia, approximately 18 kilometres southeast of the Village of Iskut and 80 kilometres south of Dease Lake. The Red Chris Mine is situated in the territory of the Tahltan Nation. The Tahltan Central Government is the administrative governing body of the Tahltan Nation, representing the Iskut Band and the Tahltan Band.

On August 24, 2005, the Minister of the Environment and the Minister of Energy, Mines and Petroleum Resources issued Environmental Assessment Certificate #M05-02 (Certificate) under the *Environmental Assessment Act*, 2002 for the Red Chris Mine to the Red Chris Development Company Ltd.

The Environmental Assessment Office (EAO) has granted four amendments to the Certificate since it was issued:

- Amendment #1 (February 24, 2012): to add a requirement for compliance reporting and revise Condition 1 to reflect updated standard Certificate language for proposed changes to the Red Chris Mine;
- Amendment #2 (August 19, 2016): to allow design changes around the Tailings Impoundment Area and to the South Dam related to water management;
- Amendment #3 (August 15, 2019): to transfer all legal interests and certain beneficial interests in the Red Chris Mine from the Red Chris Development Company to Newcrest Red Chris Mining Limited (Newcrest); and
- Amendment #4 (May 3, 2021): to upgrade the existing work camp and construct a temporary work camp to increase the maximum accommodation to up to 800 people.

In addition, the Certificate was deemed amended on December 16, 2022 to increase the maximum accommodation of the existing work camp to up to 920 people, under the provisions available under Condition 1.1 that occurred once Newcrest received an amendment to their *Mines Act* permit¹.

1.2. Overview of Amendment Application

On November 28, 2022, Newcrest submitted an application to amend the Environmental Assessment Certificate (Amendment Application) for the Red Chris Mine under [Section 32](#) of the *Environmental Assessment Act*, S.B.C. 2018, c.51 (the Act).

Newcrest's proposed changes that necessitate this Amendment are:

- Upgrades to the existing work camp facility and construct a new work camp facility to provide total accommodation for up to 1,200 people. The expansion of the facilities would add 510 beds, a kitchen, boot room, dining facilities, offices, recreation centre, an incinerator, a potable water treatment plant, expansion of the sewage treatment plant, backup power, ancillary facilities, and related infrastructure (see **Figure 1**);
- Removal of commitments O1, O2, O3, O4; and
- Revision to commitment M20.

Newcrest's Amendment Application stated that the primary purpose of the changes proposed in the Amendment is to support pre-production activities related to the proposed Block Cave Amendment, a forthcoming application to transition Red Chris Mine from an open pit mining operation to an underground mining operation. At the time of writing this Report, the Block Cave Amendment is in the early stages of the EAO's amendment review process.

¹ [The EAO's letter to Newcrest regarding the deemed amendment and pre-production phase](#)

As noted in its Amendment Application, Newcrest stated that permitting and operational changes in the past several years have rendered commitments O1, O2, O3 and O4 of the Certificate redundant or outdated and requested that these commitments be removed. Newcrest also requested to revise commitment M20 to reflect best practices for disposal of used tires.

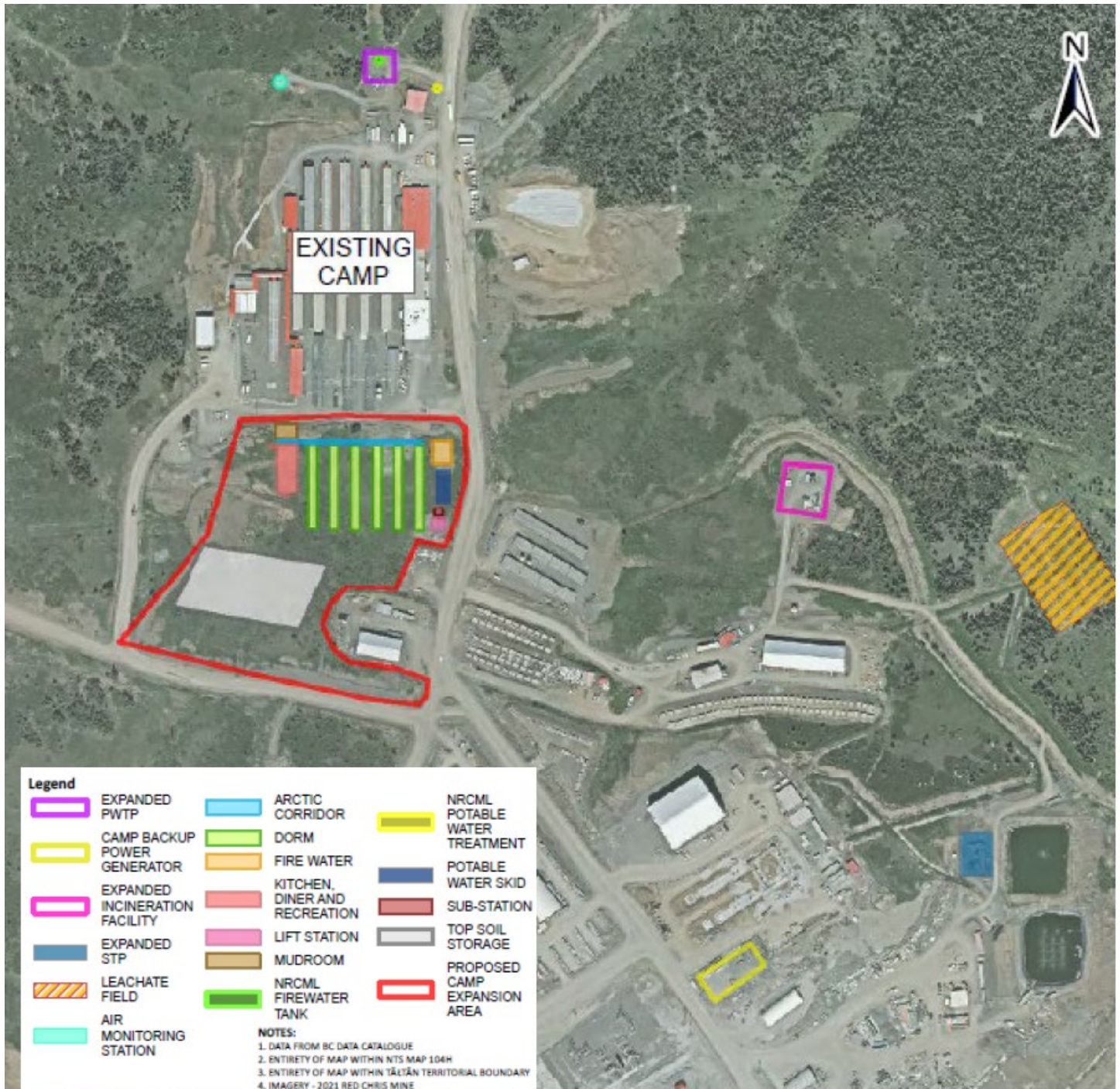


Figure 1: Proposed camp expansion area and locations for existing facilities and infrastructure along with planned upgrades, as shown in the Amendment Application (PWTP = Potable Water Treatment Plant, STP = Sewage Treatment Plant, NRCML = Newcrest Red Chris Mining Limited)

2.0 AMENDMENT REVIEW PROCESS

In accordance with the EAO's [Environmental Assessment Certificate and Exemption Policy](#), the EAO established the procedures and information requirements for reviewing the Amendment Application. The EAO considered the nature of the proposed changes to the Red Chris Mine, the potential for these changes to cause new effects to Valued Components,² Indigenous interests, and matters prescribed under [Section 25\(2\)](#) of the Act. Based on the analysis of these factors, the EAO determined that this would be a 'typical' amendment, as defined in the EAO's [Environmental Assessment Certificate and Exemption Policy](#).

The EAO concluded that Tahltan Nation would be the only First Nation potentially affected by the Amendment. Tahltan Nation, as represented by the Tahltan Central Government, notified the EAO of its intent to engage in the Amendment Assessment as a Participating Indigenous Nation.

Newcrest engaged the Tahltan Central Government on the Amendment prior to formally submitting the Amendment Application to the EAO. The EAO worked collaboratively with the Tahltan Central Government to discuss project-specific issues and potential adverse effects of the proposed changes on asserted or determined Indigenous interests and to seek consensus on the Amendment. The Amendment Assessment was carried out consistent with the Red Chris Management Agreement, a government-to-government agreement signed in 2017 between Tahltan Nation (as represented by the Tahltan Central Government) and the Province of British Columbia. Issues raised by the Tahltan Central Government are discussed in [Section 4: First Nation Engagement](#) of this report.

The EAO's assessment procedures included the establishment of a Technical Advisory Committee (TAC), comprising parties with technical and/or traditional experience in the project area, to assist with the EAO's review of Newcrest's Amendment Application and to provide comment on drafts of the EAO's Amendment Assessment Report, Amendment Order, and proposed conditions. The following groups participated as TAC members:

- Tahltan Central Government;
- Ministry of Environment and Climate Change Strategy;
- Ministry of Transportation and Infrastructure;
- Ministry of Energy, Mines and Low Carbon Innovation;
- Ministry of Forests; and
- Northern Health.

The issues raised by the TAC and the outcomes or resolutions of those issues are provided in [Section 3.3: Key Issues Raised by the TAC and Newcrest's Responses](#) of this Report.

After discussions between Newcrest, the EAO and the Tahltan Central Government, Newcrest also requested the removal of Condition 1.1 and Condition 1.2 of the Certificate. In reviewing the Amendment Application, the EAO determined that updates were required to the Certificate to reflect the EAO's best practices, and to improve mitigations related to human-wildlife conflict. An overview of the changes is provided in [Section 3.4: Proposed Changes to Conditions & the EAO's Assessment](#).

The EAO determined that there was low potential for public interest in the Amendment due to the limited scope of the proposed changes, the remote location of the Red Chris Mine and lack of interaction with the general public or other land users, and the low number of comments received during the Red Chris Mine environmental assessment and subsequent amendment processes. As a result, the EAO did not conduct a public engagement and comment period for this Amendment, and the CEO did not establish a Community Advisory Committee.

² Valued Components are components of the biophysical and human environment that are considered by the public, Indigenous nations, the proponent, government agencies, or scientists and other technical specialists involved in the environmental assessment process to have scientific, ecological, economic, social, cultural, archeological, historical, or other importance.

3.0 SUMMARY OF KEY ISSUES AND EFFECTS

3.1. Amendment Components & Activities

The Amendment would entail the construction of a new work camp facility with 510 beds, kitchen, dining facilities, offices, boot room, and a small recreation area. The new work camp facility would be constructed adjacent to the existing work camp (immediately to the South as depicted in **Figure 1**), in an area that has been previously isolated by Red Chris Mine activities and is within the current permitted mine area under the *Mines Act*. The footprint for the expanded facility is approximately 3.7 hectares, which includes the accommodations and the area required for topsoil storage. The existing work camp facility would be updated: two dorm wings would be removed and replaced with a single new recreation centre and two other wings would be upgraded to multi-story dorms with ensuite bathrooms. Newcrest would decommission the existing temporary camp after completion of the new work camp facility construction and upgrades.

In addition to the work camp facilities, existing ancillary services would be upgraded or expanded to accommodate the increase in occupancy. Upgrades include the sewage treatment plant, potable water supply and treatment system, additional firewater capacity, a second incinerator, and an expansion of the backup power distribution. All ancillary services that would be modified as part of the expansion are located within the existing disturbance footprint and permitted mine area.

Construction of the new work camp facility and upgrades to ancillary infrastructure is anticipated to take approximately four to six months. The new work camp facility and ancillary services would be in use for the remainder of the life of mine.

Newcrest stated that the increase in work camp capacity is motivated by increasing demand for space to satisfy both operational needs and requirements related to the engineering studies and permitted underground development activities for the proposed upcoming Block Cave Amendment. Newcrest anticipates that work camp capacity may need to be further increased to accommodate requirements associated with the Block Cave Amendment.

3.2. Effects Assessed by Newcrest

Prior to making a formal request for this fifth amendment to the EAO, Newcrest conducted an analysis of the potential for the proposed project changes to impact each Valued Component considered during the original Red Chris Mine environmental assessment. As the EAO's Valued Component guidelines and expectations have changed since the Certificate was initially issued, the Red Chris Valued Components were updated to align with the [EAO Effects Assessment Policy](#), while also maintaining as much consistency with previous assessments as reasonably possible. Newcrest presented a draft of the updated Valued Components to Tahltan Central Government representatives in July 2022 for feedback.

Newcrest identified that the following Valued Components had the potential to be impacted by the Amendment and would require mitigation to reduce adverse effects. Newcrest's description of the potential effects, pre-mitigation, of the Amendment on the identified Valued Components is described in Table 1 below.

- Air Quality
- Acoustics
- Landscape and Terrain
- Water Quantity
- Vegetation and Terrestrial Ecosystems
- Wildlife and Wildlife Habitat
- Local Community Health and Wellbeing
- Social Services and Infrastructure
- Local Economy
- Archaeology
- Tahltan Culture

Table 1: Newcrest's assessment of potential effects to Valued Components from the Amendment (before mitigations are applied)

Valued Component	Newcrest's Assessment of Potential Effects (pre-mitigation)
Air Quality	Air quality may be impacted by construction activities and the increase in camp occupancy. Dust on site may be generated during construction and by increased traffic. Emissions may be increased due to increased camp waste being produced and incinerated, increased traffic, construction activities, and propane use for heating and cooling systems.
Acoustics	Noise would be generated by construction machinery during the construction of the new facilities. General noise may be increased during operations because of the increased occupancy of the work camp. The increased personnel would require an additional travel day which would result in increased vehicle noise along the travel route from Red Chris Mine to the Dease Lake airport.
Landscape and Terrain	Landscape and terrain may be impacted from the stripping of soil for the expanded facilities, approximately 3.7 hectares. Landscape and terrain would also be impacted in the small areas where groundwater well heads would be installed.
Water Quantity	Water quantity may be impacted due to changes in surface water and groundwater. During construction, seasonal run-off would be diverted around the area proposed for development. The operational phase would see the continued diversion of surface water around the development area, for release downstream. During the construction phase, it is anticipated that the greatest potential effects to groundwater quantity would be due to periodic groundwater dewatering activities. This would be temporary in nature and would not have extended impact on groundwater levels in the local assessment area. The operational phase would see an increased withdrawal of groundwater for use as potable water to support the additional personnel. Additional groundwater wells may be developed to supply the Potable Water Treatment Plant.
Vegetation and Terrestrial Ecosystems	Vegetation and terrestrial ecosystems may be impacted by the potential introduction of invasive and non-native species from the transportation of materials to the site, erosion from the stripping of topsoil and the removal of vegetation from the 3.7 hectares development area.
Wildlife and Wildlife Habitat	Wildlife and wildlife habitat may be impacted by the Amendment. Traditional use species and other at-risk species may be affected by the reduction in habitat. The 3.7 hectares development area would reduce available habitat and there may be increased human-wildlife interactions due to the increase in personnel and increased waste production. Traffic-related wildlife fatalities may occur from the transport of materials and personnel.
Local Community Health and Wellbeing	Local community health and wellbeing may be impacted through impacts to health services and infrastructure, family cohesion, mental well-being, and emergency services. The expanded camp facilities would include additional recreation and physical exercise space. Fly-in, Fly-out (FIFO) rotational work schedules could interact with substance use and/or mental wellbeing and could therefore place additional strain on the capacity of the local community services and infrastructure. FIFO rotational work may also affect the ability to participate in some social/family events and cultural activities, which may affect intergenerational connection(s) and family dynamics over time. Higher incomes associated with FIFO rotational work schedules may improve financial security and greater financial security may ameliorate participation in land-based activities, recreational opportunities, and social/family events. Mental well-being may be impacted by these issues as well as the increase in personnel and resulting potential for an increased bullying rate. An increased workforce may result

Valued Component	Newcrest's Assessment of Potential Effects (pre-mitigation)
	in more individuals requiring emergency services which may affect the capacity of facilities such as Mills Memorial Hospital in Terrace.
Social Services and Infrastructure	Social services and infrastructure may be impacted by the Amendment. An increase in personnel in the region may increase competition for local labour in the social services sector, including education, daycare, and recreational services. The transport of additional personnel to and from Red Chris Mine would impact road traffic, particularly along Highway 37, as well as air traffic, particularly through Dease Lake Airport. The increase in traffic may generate the need for additional highway, road, and airport maintenance. The increase of personnel could result in some Tahltan community members relocating back to the Tahltan territory. Returning Tahltan community members may place additional pressure on housing availability. Alternatively, FIFO work schedules may result in Tahltan community members choosing to leave Tahltan territory to live in larger centres.
Local Economy	The local economy may be impacted by the Amendment, including potential impacts to employment, business, income and education and training. The Amendment would require an estimated 560 new jobs, 110 of which would be estimated to be Tahltan community members who are located within or outside the territory. There may also be an increase in employment and business opportunities for Tahltan contractors. The increased employment in the region may also increase the competition for labour. Increase labour income, wages and salaries may be experienced by Tahltan employees which in turn may provide incremental benefits to the local community through increased spending. There may be increased opportunities for new personnel to receive on the job training, apprenticeships, and site educational opportunities through employment.
Archaeology	Archaeological sites of importance may be impacted during the construction of the new facilities. Activities associated with excavation and disturbance of soil have the highest potential for interactions between the camp expansion and archaeological and heritage resources. A previously undisturbed area of 3.7 hectares would be impacted adjacent to the existing camp. An archaeological impact assessment was undertaken in July 2021, the assessment identified the proposed area as having a low potential for impact and did not recommend further archaeological work.
Tahltan Culture	Tahltan culture may be impacted by the Amendment, including impacts to hunting, gathering, and ceremonial practices and cultural cohesion. A potential increase in traffic may result in vehicular and animal interactions which could reduce wildlife availability for hunting. Increased road and air traffic may have noise and auditory impacts affecting wildlife and hunters. Increased road and air traffic may have noise impacts to plant gatherers, road traffic may also produce dust deposition on target plant species located near roads. An anticipated 110 new jobs for Tahltan community members may work a FIFO schedule at Red Chris Mine, a FIFO schedule can enable extended periods off to participate in hunting, gathering and other cultural activities. However, rotation work also has the potential to impede Tahltan employees if the schedule does not align with hunting, gathering, or other cultural activities.

Newcrest assessed the potential effects to each of these Valued Components, evaluated the mitigation measures that could avoid or minimize these effects, and provided these assessments in their Amendment Application.

Newcrest concluded the anticipated adverse effects to Valued Components would be similar to those already subject to

monitoring and management as part of the existing mine operations. Newcrest stated that potential adverse effects could be effectively managed through a combination of mitigation measures contained within management plans that are already required by the Certificate, and proposed updates to management plans, and the mitigation measures described in the Amendment Application. Newcrest committed to updating the following existing management plans related to potential effects of the Amendment: Surface Water Management Plan, Air Quality Management Plan, Wildlife Management Plan, Erosion and Sediment Control Plan, Cultural Heritage Management Plan, Construction Management Plan, and Traffic Management Plan.

After mitigations had been applied, Newcrest's analysis concluded that none of the adverse residual effects identified for the Valued Components would be significant.

3.3. Key Issues Raised by the Technical Advisory Committee and Newcrest's Responses

Comments on the Amendment Application were received from the Tahltan Central Government, Northern Health, Ministry of Environment and Climate Change Strategy (ENV), Ministry of Energy, Mines and Low Carbon Innovation (EMLI) and Ministry of Forests. A summary of key issues raised on the Amendment Application, Newcrest's responses, and information about the resolution of these issues are outlined below in Table 2. All comments from technical reviewers and Newcrest responses are available in the Issues Tracking Table on the EAO's EPIC website.³

³ The [Issues Tracking Table](https://projects.eao.gov.bc.ca/p/588510c4aaecd9001b8155e3/project-details) and other decision materials are available on the Red Chris Project page on EPIC: <https://projects.eao.gov.bc.ca/p/588510c4aaecd9001b8155e3/project-details>.

Table 2: Summary of Key Issues Raised by the TAC and Resolution

Indigenous Nation or Agency	Key Issue or Concern	Description	Resolution
Tahltan Central Government, ENV, EMLI	Sewage and Water Quality	The Tahltan Central Government requested additional information about existing sewage treatment and septic field facilities and their capacity for increased use, performance, and efficacy of proposed changes. ENV asked Newcrest to indicate if information about the camp expansion amendment will be provided to ENV in the current Municipal Wastewater Regulation application. ENV requested an assessment of impacts to water quality from adding treated sewage effluent to the tailings impoundment area. EMLI asked Newcrest to confirm that the Engineer of Record for the tailings impoundment area has reviewed and approved the proposed discharge of sewage effluent to the tailings impoundment area.	Newcrest responded with additional information about the sewage treatment plant and flow capacity. Industry guidelines use a standardized value of discharge per day per person for workcamps, and that sewage will be treated and then piped to the process plant and subsequently to the tailings impoundment area. Use of the existing leachate field would be limited to when emergency repairs and maintenance activities occur. Newcrest confirmed they will engage ENV for the wastewater plant capacity increase and final discharge to the tailings impoundment area. Newcrest responded to ENV and EMLI comments that the volumes to be introduced via the Sewage Treatment Plant treated effluent account for approximately <0.4 percent of the daily discharge to the tailings impoundment area. This volume was deemed insignificant and does not impact the water balance. Reviewers confirmed that their comments were resolved and the EAO is satisfied with Newcrest's responses.
Tahltan Central Government and Northern Health	Water Quantity	Tahltan Central Government inquired about the necessity for the proposed additional wells when existing capacity would meet current and future water demands. Northern Health asked if dewatering from construction activities would affect the groundwater quantity to meet water demands.	Newcrest responded that the additional water demands are averaged over a day; however, the availability of water must satisfy peak water demands generally experienced prior to and following each shift. The available water must satisfy both the potential peak volumes and provide additional capacity for emergencies. To satisfy these needs, a factor of two or greater is generally used. A water storage system to meet peak demand, emergencies, and fire will be part of the upgraded system. Newcrest, in response to Northern Health's question, confirmed

Indigenous Nation or Agency	Key Issue or Concern	Description	Resolution
			that construction dewatering would have no impact to the potable water wells as they are located up-gradient with no known connectivity. Reviewers confirmed that their comments were resolved and the EAO is satisfied with Newcrest's response.
Tahltan Central Government	Groundwater	Tahltan Central Government expressed concern about the additional pumping of the camp bedrock wellfield, which may gradually over time pull in groundwater from the overburden aquifers into the bedrock aquifer. Tahltan Central Government added that the key question is whether the camp wells will affect the tailings impoundment area water balance or the groundwater baseflow to local streams. The bedrock and overburden groundwater systems are not independent or isolated from each other but are highly connected. Tahltan Central Government added they expect that Newcrest will be undertaking the following related work prior to the Block Cave Amendment: • Additional wells will be drilled to support camp expansion. • Camp wells will be pump-tested. • Results of pump tests will be incorporated into the groundwater numerical model. • The resulting updated numerical model with camp well pump test results included will be shared with Tahltan Central Government.	Newcrest responded that they believe they have addressed the groundwater concerns to sufficient detail and that the matter is being assessed through the <i>Water Sustainability Act</i> application currently in process. Newcrest added that they acknowledge Tahltan Central Government's request for related work to be undertaken before the Block Cave Amendment and either have completed or are currently undertaking this work. Tahltan Central Government confirmed that with Newcrest's commitment to undertaking the related work before the Block Cave Amendment their comments were resolved. The EAO is satisfied with Newcrest's response.
Tahltan Central Government, Northern Health,	Air Quality	Tahltan Central Government asked if air quality monitoring was occurring in the Iskut community.	Newcrest confirmed the air quality monitoring network included locations within Iskut; however, monitoring in Iskut was suspended during the COVID-19 pandemic. Newcrest indicated

Indigenous Nation or Agency	Key Issue or Concern	Description	Resolution
ENV		Northern Health expressed concerns about the assessment of air quality residual effects as negligible and if work camp residents were considered as receptors. Northern Health enquired about rationale for the location of the incinerators in relation to predominate wind direction. Northern Health had several additional concerns about air quality, including general air quality trends, particulate and dust monitoring, assessment areas, and the Air Quality Management Plan. ENV requested Newcrest ensure the Air Quality Management Plan has been appropriately reviewed and updated. ENV ensured Newcrest was aware that an amendment to the appropriate permit would be required prior to installation of the new incinerator.	there are plans to reinstate the monitoring in Iskut in October 2023. Newcrest responded to Northern Health's air quality concerns in a screening-level Human Health Risk Assessment, which evaluates the contaminate exposure pathways for the camp residents. Newcrest also provided a summary of existing air quality data and existing mitigation measures. Newcrest acknowledged ENV's requests. Reviewers confirmed that their comments were resolved and the EAO is satisfied with Newcrest's responses.
Tahltan Central Government	Traffic	Tahltan Central Government expressed concern about the impact of increased Highway 37 traffic on Tahltan residents and traffic-wildlife incidents. Tahltan Central Government requested a traffic impact assessment for the Block Cave Amendment.	Newcrest noted that they are a member of the Highway 37 Working Group and they are entering into a Memorandum of Understanding to provide emergency response capabilities to support the associated sections of Highway 37. Newcrest committed to conduct a traffic impact assessment for the Block Cave Amendment. Tahltan Central Government indicated, with the commitment to a traffic impact assessment for the Block Cave Amendment, their concerns had been resolved and the EAO is satisfied with Newcrest's responses.
Tahltan Central Government	Tahltan Culture and Tahltan's	Tahltan Central Government expressed concern about impacts to Tahltan culture from an increased workforce. Tahltan Central Government emphasized the importance	Newcrest acknowledged Tahltan Central Government's concerns and identified addressing these concerns were a significant priority. Newcrest committed to working with the Social Cultural

Indigenous Nation or Agency	Key Issue or Concern	Description	Resolution
	Social Cultural Committee	of recognizing Tahltan Indigenous Knowledge in the assessment. Tahltan Central Government identified several areas where impacts to Tahltan culture could be improved, including holistic health services, traditional food options, childcare support, and alternatives to the current FIFO schedule. An assessment of cumulative effects to culture was recommended. Tahltan Central Government added that the Tahltan's Social Cultural Committee, listed in the application as a mitigative measure, is not part of the regulatory process but advises, reviews, and monitors implementation of initiatives that may result from the environmental assessment. Tahltan Central Government stated that further mitigations to address this issue will need to be generated and shared during the Block Cave Amendment.	Committee to ensure such matters are addressed and communicated to the Project Advisory Committee in an appropriate and timely manner. Regular engagement with the Tahltan Central Government and Bands regarding realized effects to Tāltān Culture and potential avenues to address these concerns is ongoing. Newcrest agreed to a broader assessment, along with additional mitigation measures, as part of the Block Cave Amendment Application. Tahltan Central Government indicated, with the commitment to a broader cultural assessment for the Block Cave Amendment, their concerns had been resolved and the EAO is satisfied with Newcrest's responses.
Northern Health	Human Health Risk Assessment	Northern Health requested Newcrest produce a Human Health Risk Assessment to assess the potential human health risks from exposure to environmental contaminants related to the project and the inclusion of worker-residents as one of the human receptors.	Newcrest provided a screening-level Human Health Risk Assessment which satisfied Northern Health's request and committed to providing a broader Human Health Risk Assessment for the Block Cave Amendment. The EAO is satisfied with Newcrest's response.
Northern Health	Health and Medical Services Plan	Northern Health requested a condition to require a Health and Medical Services Plan which incorporates the Health and Medical Services Plan Best Management Guide for Industrial Camps.	The EAO proposes a condition requiring the development of a Health and Medical Services Plan (Condition 8), to be developed in consultation with Northern Health and the Tahltan Central Government.

Indigenous Nation or Agency	Key Issue or Concern	Description	Resolution
Northern Health	Health Clinic Capacity	Northern Health expressed concerns that the larger workforce would increase pressures on Red Chris onsite medical services and on local health and emergency services.	Newcrest responded that it has an extensive medical response plan with a network of physicians supporting the onsite team providing broad capabilities and capacity. Onsite treatment is prioritized where possible, with appropriate triage applied if higher level care is required. This is a consultative process such that the imposition on regional medical services is minimal. Newcrest projected that the total number of cases sent off site will, on average, increase by less than 1 per month. The EAO is satisfied with Newcrest's responses following the submission of Newcrest's screening-level Human Health Risk Assessment and EAO's proposed condition requiring the development of a Health and Medical Services Plan (Condition 8).

3.4 Proposed Changes to Conditions & the EAO's Assessment

Proposed Changes to Conditions

Newcrest noted in its Amendment Application that permitting and operational changes in the past several years have rendered commitment O1, O2, O3 and O4 of the Certificate redundant with permitting requirements. Following an analysis of the commitments and discussions with EMLI and ENV, the EAO agreed with Newcrest's assessment and recommends the removal of commitments O1, O2, O3 and O4 from the Certificate in the draft Amendment Order.

In its Amendment Application, Newcrest also requested that commitment M20 be updated to reflect best practices for disposal of used tires. Following an analysis of commitment M20, the EAO agreed that the commitment should be updated and proposed new wording in the draft Amendment Order.

In response to concerns raised during the Amendment Assessment, the EAO has proposed additional changes to the Certificate. Condition 8, a requirement to develop a Health and Medical Services Plan, is proposed in response to concerns regarding the impacts of a larger workforce.

Currently, Conditions 1.1 and 1.2 of the Certificate allow for deemed amendments, whereby Newcrest can modify the design, location, operation, or decommissioning of Red Chris without a formal amendment process provided that specific criteria are met. With the support of the Tahltan Central Government, Newcrest requested the removal of Condition 1.1 and 1.2 of the Certificate during the Amendment Assessment. The EAO agreed with Newcrest's request and has recommended this change in the draft Amendment Order.

During the Amendment Assessment, the EAO's Compliance and Enforcement division identified an ongoing issue related to ambiguous language used in Commitment C11 regarding the operation of a bear fence and requested that the commitment be updated. Following discussions between Newcrest and the EAO, the EAO proposed Condition 9: Human-Wildlife Conflict Mitigation to incorporate best practices to mitigate human-wildlife conflict at the camp facilities. The condition proposes requirements for a bear safety training program, wildlife resistant storage for wildlife attractants, and clearer language related to energized bear fencing.

In reviewing the Amendment Application, the EAO also determined that additional conditions were required to reflect the EAO's best practices for: document reviews; the development of, and updates to, management plans; consultation; and compliance notifications, inspection, and verification. The EAO thus proposed Conditions 1 through 7 to bring additional clarity to Newcrest's Certificate requirements and consistency with other certificates.

The EAO's Assessment

In its Amendment Assessment, the EAO carefully considered the matters prescribed under [Section 25\(2\)](#) of the Act. The EAO considered Newcrest's description of the potential effects of the Amendment, as well as Newcrest's commitments to updating the Surface Water Management Plan, Air Quality Management Plan, Wildlife Management Plan, Erosion and Sediment Control Plan, Cultural Heritage Management Plan, Construction Management Plan, and Traffic Management Plan in relation to the proposed expansion of the camp.

The EAO proposed changes to the Certificate (including nine conditions in the draft Amendment Order) to address issues raised during the Amendment Assessment and to improve the clarity of the Certificate. The EAO notes that, with Newcrest's commitments and the proposed changes to the Certificate as included in the draft Amendment Order, the issues raised by technical reviewers were resolved to their satisfaction and to the EAO's.

In consideration of the information provided by Newcrest, the views of technical reviewers, and the EAO's proposed draft Amendment Order (including the nine new conditions), the EAO is of the view that the Amendment would not have significant adverse residual effects.

4.0 FIRST NATION ENGAGEMENT

4.1. Newcrest-Led Engagement

In the Amendment Application, Newcrest reported that it engaged the Tahltan Central Government about the Amendment prior to submitting the Amendment Application to the EAO. During the Amendment Assessment, Newcrest participated in regular bi-weekly meetings with Tahltan Central Government representatives to provide updates and address issues.

Newcrest further reported that the Amendment was discussed with the Tahltan Central Government under two forums established under the Newcrest – Tahltan Central Government Impact Benefit Co-Management Agreement: the Socio-Cultural Committee and the Environmental Oversight Committee. The proposed camp expansion and its potential impacts were discussed at a Socio-Cultural Committee meeting on May 10, 2022, and feedback was incorporated into the project's design. Updates regarding the progress of the Amendment review were discussed at regular Environmental Oversight Committee meetings.

4.2. EAO-Led Engagement

The Tahltan Central Government and the Province of British Columbia have a history of shared decision-making commitments, including those established under the 2017 Red Chris Mine Management Agreement. The EAO worked with Tahltan Central Government, as a Participating Indigenous Nation, to tailor engagement to the potential impact of the amendment on Tahltan's Indigenous rights and title, Tahltan's technical interests, and the protocols of the Red Chris Mine Management Agreement. Throughout the amendment process, the EAO sought, and was able to achieve, consensus with Tahltan Central Government on the findings and conclusions of this report, pursuant to [Section 32\(7\)](#) of the Act.

The EAO conducted early engagement regarding this amendment with the Tahltan Central Government when Newcrest provided draft documents that described its intention to amend the Certificate. The EAO met regularly with the Tahltan Central Government to discuss the amendment request and to ensure the amendment process met Tahltan Central Government expectations. The EAO invited comments from the Tahltan Central Government on the Amendment Application and draft referral materials, asking the Tahltan Central Government to identify any comments or concerns that the Tahltan Central Government may have with the Amendment.

Comments made by the Tahltan Central Government regarding the Amendment Application and the outcomes or resolutions of those comments are described above in [Section 3.2: Key Issues Raised by the Technical Advisory Committee and Newcrest's Responses](#). The Tahltan Central Government reviewed this Amendment Report and the draft Amendment Order, along with Newcrest's responses to the Tahltan Central Government's comments.

4.3. Tahltan Central Government Perspectives on Engagement⁴

The Tahltan Central Government confirmed its interest in being a Participating Indigenous Nation at the outset of the Amendment. As a Participating Indigenous Nation, Tahltan Central Government reviewed and commented on the Amendment Application and on several rounds of Newcrest's responses to concerns raised by the Tahltan Central Government in the Issues Tracking Table. The Tahltan Central Government engaged regularly with the EAO and Newcrest throughout the Amendment Assessment.

Though several Tahltan Central Government technical questions were resolved through engagement, concerns remain related to the socio-cultural, community-based, and cumulative impacts of the Red Chris Mine. The Tahltan Central Government is aware that the forthcoming Block Cave Amendment, currently in early stages of the Environmental

⁴ The Tahltan Central Government provided the views for inclusion in this section of the report.

Assessment process, will also include further expansion to the camp. The Block Cave Amendment is considered a substantial change to the Red Chris Mine and is subject to the consent-based decision-making agreement under Section 7 of the *Declaration on the Rights of Indigenous Peoples Act*, which was signed on November 1, 2023. As per the requirements of this agreement, the Block Cave Amendment will undergo a Tahltan Risk Assessment and will require Tahltan consent to proceed. Given the scale of the upcoming Block Cave Amendment process and the requirement for Tahltan consent, the Tahltan Central Government is of the view that the Block Cave Amendment is a more suitable venue for addressing the remaining concerns. The Tahltan Central Government has agreed to defer outstanding comments identified in the Issues Tracking Table to be further explored and fully addressed during the review of the Block Cave Amendment.

Given Newcrest's commitments in the Issues Tracking Table, including deferral of several of the Tahltan Central Government's concerns to the review of the Block Cave Amendment, and the draft conditions proposed by the EAO in the Amendment Order, all concerns raised by the Tahltan Central Government related to the Amendment were addressed by Newcrest to the EAO's and the Tahltan Central Government's satisfaction. Consensus was achieved between the EAO and Tahltan Central Government on this Report, the draft Amendment Order, and the recommendations whether to issue the Amendment.

5.0 CONCLUSIONS

Based on:

- The information contained in Newcrest's Amendment Application and supplemental information provided by Newcrest during the review of the Amendment Application;
- Newcrest's consultation and engagement with the Tahltan Central Government;
- The EAO's engagement with members of the TAC, which included representation by the Tahltan Central Government;
- Comments on the Amendment Application from the TAC and the Tahltan Central Government, and Newcrest's responses to those comments;
- The addition of nine conditions, including requirements for a Health Medical Services Plan and additional mitigation for human-wildlife contact, as well as updates to the Certificate commitments; and
- Newcrest's requirements under the Certificate to mitigate and monitor the effects of the Red Chris Mine.

The EAO is satisfied that:

- The Amendment Application adequately identified and assessed the potential positive and negative adverse changes to the environmental, economic, social, cultural and health effects of the Red Chris Mine resulting from the Amendment;
- The effects of the amendment on the Tahltan Central Government as described in [Section 25\(1\)](#) of the Act have been appropriately assessed and have been addressed to the satisfaction of the EAO and the Tahltan Central Government;
- The matters described in [Section 25\(2\)](#) of the Act have been considered and there would be negligible negative changes in the effects on these matters as a result of the Amendment;
- Consultation with the Tahltan Central Government about the Amendment has been adequately carried out by the Certificate Holder and the EAO;
- Consensus with the Tahltan Central Government was achieved with respect to the Amendment Application, this Amendment Report and its conclusions, and the draft Amendment Order, with consideration given to the deferral of key Tahltan Central Government concerns to the Block Cave Amendment;
- The provincial Crown has fulfilled its statutory and constitutional obligations owed to First Nations relating to the issuance of an amendment to the Certificate for the changes proposed in the Amendment Application; and

- The Certificate should be amended to reflect the design changes outlined in the Amendment Application.

The EAO recommends that the Deputy Chief Executive Assessment Officer of the EAO, upon consideration of the conclusions in the Amendment Report (this report) and the other relevant factors, issue an Amended Certificate under [Section 32](#) of the Act to allow the requested Amendment of the Certificate for the Red Chris Mine.