



BC EAO EAC Application – Tenas Project

Section 13.0 Management Plans

Chapter 16 Socio-economic Management Plan

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Tenas Project

Section 13.0 Management Plans

Chapter 16 Socio-economic Management Plan

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ABBREVIATIONS AND ACRONYMS

Abbreviation or Acronym	Long Form of Abbreviation or Acronym
AQMP	Air Quality Management Plan (S13.0-C2)
BC	British Columbia
BC MECC	British Columbia Minister of Environment and Climate Change Strategy
BC MEMLI	British Columbia Minister of Energy, Mines and Low Carbon Innovation
C	Chapter
CEMP	Construction Environmental Management Plan (S13.0-C4)
CMSTHP	Chemicals and Materials, Storage, Transfer, and Handling Plan (S13.0-C3)
Code	Health, Safety and Reclamation Code in British Columbia (British Columbia Ministry of Energy, Mines and Low Carbon Innovation [BC MEMLI] 2021)
CPP	Coal Processing Plant
EA	environmental assessment
EAC	Environmental Assessment Certificate
EMS	Environmental Management System (S13.0-C1)
ERT	Emergency Response Team
FMSCP	Fuel Management and Spill Control Plan (S13.0-C7)
FTE	full-time equivalents
GDP	Gross Domestic Product
HRMP	Heritage Resources Management Plan (S13.0-C8)
JAIR	Joint Application Information Requirements for <i>Mines Act</i> and <i>Environmental Management Act</i> Permits (British Columbia Ministry of Energy, Mines and Petroleum Resources [BC MEMPR] and British Columbia Ministry of Environment and Climate Change Strategy [BC MECCS] 2019).
LSA	Local Study Area
MA/EMA	<i>Environmental Management Act</i> , SBC 2003, c 53 and <i>Mines Act</i> , RSBC 1996, c 293
MERP	Mine Emergency Response Plan (S13.0-C9)
MTCP	Minesite Traffic Control Plan (S13.0-C10)
NDIT	Northern Development Initiative Trust
OHSP	Occupational Health and Safety Program (S13.0-C13)
OW	Office of the Wet'suwet'en
PAMP	Public Access Management Plan (S13.0-C14)
Project	Tenas Project
RCP	Reclamation and Closure Plan (S13.0-C15)
RDBN	Regional District of Bulkley-Nechako
RFP	Request for Proposal

Abbreviation or Acronym	Long Form of Abbreviation or Acronym
RRSP	Registered Retirement Savings Plan
RSA	Regional Study Area
RV	recreational vehicle
S	Section
SEMP	Socio-economic Management Plan (S13.0-C17)
TAC	Tenas Access Corridor
TCL	Telkwa Coal Limited
UNDRIP	United Nations Declaration on the Rights of Indigenous Peoples
VC	Valued Component
VMP	Vegetation Management Plan (S13.0-C18)

UNITS OF MEASURE

Abbreviation or Acronym	Long Form of Abbreviation or Acronym
%	percent
km	kilometre
km ²	square kilometre

EXECUTIVE SUMMARY

This Socio-economic Management Plan (SEMP) provides information about the Tenas Project (Project) and the surrounding context of the SEMP. In addition, a framework for the development of Project-specific strategies to manage socio-economic matters is also provided. It is based on the mitigation measures identified in other sections of the Environmental Assessment Certificate (EAC) Application. Proposed SEMP community engagement programs, annual reporting, monitoring and adaptive management are also discussed, as are roles and responsibilities.

The SEMP will be used by Telkwa Coal Limited (TCL) to mitigate potential effects on the socio-economic conditions of all employees and residents of the Regional Study Area (RSA). In doing so, TCL believes that the strategies summarised in the SEMP will provide more than a “do no harm approach” and will be an approach that focuses on leaving behind positive socio-economic legacies in the region.

1. INTRODUCTION

The Tenas Project (Project) has a projected mine life of approximately 25 years, including the Construction, Operation, Decommissioning and Reclamation, and Post-closure phases. The Project will provide employment and economic opportunities to Indigenous groups and residents of the Bulkley Valley, and the surrounding region including the province of British Columbia (BC) and Canada as whole. The Project will provide tax revenues for local, provincial, and federal governments.

Telkwa Coal Limited (TCL) is committed to developing the Project in a sustainable manner that respects natural, heritage, social and environmental values, while providing economic benefits for the local, regional, provincial, and federal governments.

The Project, and the majority of the Bulkley River drainage, is within the Wet'suwet'en territory. Specifically, the Project Minesite is within the traditional territory of the *Cas'Yex* (Grizzly House) of the *Gitumden* clan of the Wet'suwet'en. TCL also recognizes that the Project Rail Loadout is located within *Laksilyu* clan territory of the Wet'suwet'en.

This Socio-economic Management Plan (SEMP) addresses the development and implementation of programs that enhance the social and economic opportunities for those in the Project Area and surrounding communities.

2. PURPOSE AND OBJECTIVES

The Project has been designed to minimize, mitigate, manage, or remove potential adverse effects on communities while systematically seeking to enhance the beneficial effects of the Project.

The SEMP will be fully developed prior to the start of the Construction Phase, in accordance with any relevant conditions of the Environmental Assessment Certificate (EAC), other regulatory requirements, and TCL internal company standards and policies. The SEMP reflects TCL's intention to implement and carry out the necessary measures to mitigate potential adverse effects of the Project, support and enhance Project benefits, and to monitor and report upon the actual economic and social effects of the Project once it is underway. This SEMP will provide more than a "do no harm approach" and will be an approach that focuses on leaving behind positive socio-economic legacies in the region.

3. SCOPE AND SCALE

The scope of this SEMP is defined within the Project Area and includes all activities, as well as any operation and/or construction activities that are directly associated with the operations and exist outside of the Project Area. Specifically, the scope of the SEMP encompasses the Socio-economic Local Study Area (LSA) and Regional Study Area (RSA). The SEMP is in effect during the Construction, Operation, Decommissioning and Reclamation, and Post-closure phases and ceases to be in force at the final closure of the Project as approved by regulatory authorities.

Based on the predicted socio-economic effects of the Project and corresponding mitigation measures¹, as identified in the EAC Application, the SEMP will:

- ▶ summarize TCL's commitments to mitigation and management measures;
- ▶ present TCL's strategy to address these measures through a series of Project-specific programs;
- ▶ describe how effects will be monitored and how the effectiveness of management practices will be evaluated; and
- ▶ provide a plan for annual reporting of SEMP performance based on monitoring efforts.

In the long-term, the annual SEMP review will seek to:

1. verify the accuracy of the residual effects predictions, and the value of proposed mitigation measures;
2. assess the efficacy of proposed mitigation measures and the need for modifications to those measures to further reduce adverse effects and/or enhance beneficial effects and leave behind positive socio-economic legacies;
3. identify unexpected socio-economic issues or challenges;
4. implement additional mitigation measures as per follow-up strategies and management plans, and
5. ensure annual monitoring and reporting is effectively representing socio-economic conditions.

3.1 Communities and Indigenous Groups

Communities relevant to this SEMP include Town of Smithers, Village of Telkwa, District of Houston, and Witsset First Nation (**Figure 3.1-1**). These communities are referred to as the LSA. The RSA includes the Regional District of Bulkley-Nechako (RDBN) and the community of Witsset. The LSA communities and the RSA were selected because the Project is expected to provide training, employment and contracting opportunities to workers and businesses from those communities and/or region and can thus impact socio-economic conditions of those communities.

¹ This includes the consideration of all socio-economic effects as detailed in **Section 5** and **Section 6** of the **EAC Application** and summarized in this SEMP.

3.1.1 Smithers

The Town of Smithers is located within Electoral Area A of RDBN, approximately halfway between Prince Rupert and Prince George and approximately 25 kilometres (km) north of the Project (**Figure 3.1-1**). Smithers is the regional service centre for the Bulkley Valley, and it provides a range of commercial, business, administrative, recreational, and cultural services. In 2016, according to Statistics Canada (2016a), Smithers' population was 5,351, virtually unchanged from the 2011 census.

3.1.2 Telkwa

The Village of Telkwa is located within Electoral Area A of RDBN, approximately 11 km southeast of Smithers and approximately 7 km northeast of the Project. The community is dependent on the resource-based economy, including mining, agriculture, and forestry (**Figure 3.1-1**). Telkwa also functions as a satellite community, housing workers who commute to Smithers, Houston or other surrounding areas. In 2016, (Statistics Canada 2016b), Telkwa's population was 1,327, a small decrease of 1.7 percent (%) from the 2011 census.

3.1.3 Houston

The District Municipality of Houston is located within Electoral Area G of RDBN, approximately 65 km southeast of Smithers and approximately 41 km from the Project (**Figure 3.1-1**). The community was founded on farming and remains economically dependent on agriculture, mining and forestry. In 2016, Houston's population was 2,993, a 4.9% decrease from the 2011 census.

3.1.4 Wet'suwet'en and Other Indigenous Groups

TCL acknowledges the unceded rights of the Wet'suwet'en and their 22,000 square kilometres (km²) of traditional territory within which the Project is located. The Wet'suwet'en territory includes much of the Bulkley River drainage. TCL has and will continue to engage with the Office of the Wet'suwet'en (OW) in respect to all Project activities. The OW is the central office for Wet'suwet'en hereditary governance, which focuses on the management of their lands and resources, fisheries and wildlife, human and social services, and treaty negotiations. The OW is governed by the Wet'suwet'en Hereditary Chiefs residing throughout their traditional territories.

The Project Minesite is within the traditional territory of the Cass Yex (Grizzly House) of the Gitdumden Clan of the Wet'suwet'en. The Project Rail Infrastructure area is located within Kwen Beegh Yex (House Beside the Fire) territory of the Laksilyu Clan of the Wet'suwet'en.

Witset First Nation (formerly Moricetown) is governed by a Chief and 12 councillors elected under the *Indian Act*, RSC 1985, c I-5. The primary reserve community of Moricetown 1 is located approximately 30 km north of Smithers. The band has a total population of 2,041 people, 657 of whom live on their own reserve. Data for Witset is based on Census data for the following Indian Reserves: Moricetown 1, Coryatsaqua (Moricetown) 2, Bulkley River 19, and Babine 17.

Wet'suwet'en First Nation (formerly known as Broman Lake Band) is also located in the RSA. Wet'suwet'en First Nation is governed by a Chief and two (2) Councillors elected under a custom electoral system. In addition to membership in the OW, Wet'suwet'en First Nation is a member of the Carrier-Sekani Tribal Council.

4. COMPLIANCE OBLIGATIONS

This subsection summarizes the relevant compliance approvals and requirements that the SEMP will address.

4.1 Regulatory Requirements

Several legislative requirements are applicable to socio-economics. A short list of these requirements and their major applicable components are provided in **Table 4.1-1** below.

Table 4.1-1: Legislation and Guidelines Relevant to the Socio-economic Management Plan (SEMP)

Legislation, Regulations and Guidelines	Applicable Information
Health, Safety and Reclamation Code for British Columbia (British Columbia Ministry of Energy, Mines and Low Carbon Innovation [BC MEMLI]) (Code)	Regulates permitting of mines under Part 10, including meeting United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP)
<i>Declaration on the Rights of Indigenous Peoples Act</i> , SBC 2019, c 44 (Government of British Columbia [GovBC] 2019)	With respect to the UNDRIP, the Act respects the human rights of Indigenous peoples while introducing better transparency and predictability
Standard Working Group Comments and Recommendations for Provincial Environmental Assessments in Northern British Columbia (Northern Health 2015)	Northern Health guidelines for environmental assessment (EA) comments involving recommendations on socio-economics

Under Part 3, Section 8 of the Reviewable Projects Regulation, BC Reg 243/2019 for the *Environmental Assessment Act*, SBC 2018, c 51, the proposed Project will trigger an environmental assessment (EA), as its proposed production rate is above the 250,000 tonnes per year threshold.

TCL will be applying for a joint *Mines Act*, RSBC 1996, c 293 and *Environmental Management Act*, SBC 2003, c 53 (MA/EMA) permit. There are no references to a SEMP in the Joint Application Information Requirements for *Mines Act* and *Environmental Management Act* Permits (British Columbia Ministry of Energy, Mines and Petroleum Resources [BC MEMPR] and British Columbia Ministry of Environment and Climate Change Strategy [BC MECCS] 2019) (JAIR); however, section 1.5 of the JAIR document describes Indigenous engagement.

Permits can be developed during the EA process and made after an EAC is issued by the Ministers of the British Columbia Ministry of Energy, Mines and Low Carbon Innovation (BC MEMLI), and the BC MECCS.

4.2 Standard Practices and Procedures (SPP)

All TCL SPPs will conform to the Health, Safety and Reclamation Code for Mines in British Columbia (BC MEMLI 2021) (Code).

In addition to regulatory requirements, the Project will implement SPPs that meet or exceed the required laws and regulations.

4.3 Corporate Policies and Programs

The SEMP reflects TCL's core values as described below:

- ▶ **Health and Safety:** Safety is a core value of our company. We believe that all activities can be completed with zero harm to personnel and the public and that all incidents and injuries are preventable. We will provide resources to manage health and safety and expect all employees and contractors to share in the responsibility;
- ▶ **Indigenous People:** We acknowledge and respect the unceded rights, title, interests, culture, and aspirations of the Wet'suwet'en to 22,000 km² of traditional territory. In April 2017, TCL signed a Community and Engagement Agreement as an initial, formal step in our commitment to the Wet'suwet'en;
- ▶ **Environment:** Through the TCL Environmental, Social, and Governance Policy and the **Environmental Management System (Section [S] 13.0-Chapter [C] 1) (EMS)**, we will ensure that Project activities are responsible and protective of the environment. Our design and operational activities will adhere to the mitigation hierarchy to avoid and minimize impacts, restore onsite and offset, where necessary; and
- ▶ **Community:** Integrity is fundamental to how we operate. We will engage with the community and stakeholders with the aim of understanding and addressing their socio-economic priorities and goals.

5. RELATIONSHIP TO OTHER MANAGEMENT PLANS

The Project is governed by an **EMS**, an overarching management plan strategy comprising a set of processes and practices which enable TCL to manage its environmental and safety performance in a holistic way, within an integrated framework. While the management plans are part of the **EMS**, the **EMS** is not just a collection of management plans.

In addition to the overall guidance of the EMS, this SEMP has a relationship with other management plans that also present mitigation measures. Those management plans and their relationship to this SEMP are listed in **Table 5-1**.

Table 5-1: Management Plans with Relationship to the Socio-economic Management Plan (SEMP)

Management Plans	Nature of Relationship
Air Quality Management Plan (S13.0-C2) (AQMP)	One of the concerns of the community is dust and noise emissions.
Chemicals and Materials, Storage, Transfer, and Handling Plan (S13.0-C3) (CMSTHP)	There is a local procurement opportunity with the use of chemicals for the Tenas Project (Project).
Construction Environmental Management Plan (S13.0-C4) (CEMP)	Procurement and services provide opportunities.
Fuel Management and Spill Control Plan (S13.0-C7) (FMSCP)	One of the concerns of the community is spills.
Heritage Resources Management Plan (S13.0-C8) (HRMP)	One of the concerns of the community is the protection of heritage resources.
Mine Emergency Response Plan (S13.0-C9) (MERP)	This plan will interact with local emergency response procedures.
Minesite Traffic Control Plan (S13.0-C10) (MTCP)	This plan assists with enforcing safe limits on driving.
Occupational Health and Safety Program (S13.0-C13) (OHSP)	The OHSP addresses the health and wellness of employees working in the Project Area as part of the overall health and wellness of the community under the SEMP.
Public Access Management Plan (S13.0-C14) (PAMP)	Employee and public safety involves escorts through the Minesite in some circumstances.
Reclamation and Closure Plan (S13.0-C15) (RCP)	Activities provide opportunity for socio-economic procurement.
Vegetation Management Plan (S13.0-C18) (VMP)	Activities provide opportunity for socio-economic procurement.

6. DETAILS OF THE SOCIO-ECONOMIC MANAGEMENT PROGRAM (SEMP)

6.1 Socio-economic Management Program (SEMP) Potential Effects

TCL is committed to managing the social and economic effects of the Project in such a way as to maximize potential positive and beneficial outcomes and reduce, or where possible eliminate, negative or adverse effects.

Through Project employment and procurement, the Project will provide significant economic benefits to the communities, the region, and the provincial economy. These benefits will include provision of employment, training opportunities, procurement from businesses, increased government tax revenue and increased Gross Domestic Product (GDP).

6.1.1 Construction Phase

The Project Construction Phase would provide a total of 118.3 full-time equivalent (FTE) of contractor employment with labour cost of \$12.4 million, and 9.6 FTEs for TCL employees with labour cost of \$1.2 million. Construction activity would peak at 186 jobs in June of the second year of the Construction Phase. TCL predicts that an estimated 58% of all direct jobs/FTEs during the Construction Phase would be fulfilled by existing residents of the LSA communities.

During the Construction Phase, the Project would spend an estimated \$123.5 million on labour, equipment, and supplies. By category, the largest spending will include the purchase of heavy equipment and Coal Processing Plant (CPP) construction. Of the total \$107.3 million to be spent on equipment and supplies, an estimated \$34.2 million will be spent in the RDBN and \$26.7 million will be spent in the rest of BC.

6.1.2 Operation Phase

During the Operation Phase, the Project would provide up to 133 direct FTEs for TCL employees, with an estimated 60 people working onsite at any given time due to shift rotations for all workers. As estimated 119 of those FTEs would be filled by workers from the LSA. There would be also on average 17 FTE jobs for contractors.

Over the Operation Phase, the Project will spend an estimated \$1.18 billion on labour, equipment, and supplies. By category, the largest spending will include the purchase of heavy equipment and CPP construction. Of the total, \$558.1 million will be spent on equipment, parts, and consumables. Based on the sourcing of equipment, parts and consumables, of the total \$838.3 million, \$675.5 million will be spent in the RDBN, and \$135.7 million will be spent in the rest of BC. The average annual spend on employees and contractors is respectively \$13.7 and \$1.7 million per year, with the average spend on consumables of \$25.4 million, and \$12.7 million for equipment and parts.

6.1.3 Decommissioning and Reclamation Phase

During Decommissioning (Year 22), the Project would provide 20.6 FTEs for TCL employees with an estimated total income effect (including burden) of \$2.4 million, and 10 FTEs for contractors with an estimated total income effect (including burden) of \$1.1 million. During Reclamation (Year 23-25), the Project would provide 18.2 FTEs (for a total of 54.6 person-years of employment over that phase), with an estimated total income impact (including burden) of \$5.9 million.

The total cost of Decommissioning of the Minesite, to be completed over one (1) year, is estimated at \$5.6 million, including \$3.4 million in labour cost (TCL employees and contractors). The total cost of Reclamation of the Minesite, to be completed over three (3) years, is estimated at \$25.5 million, including \$5.9 million in labour cost (TCL employees only).

6.1.4 Post-closure Phase

The Project would provide one (1) job during the Active Post-closure Phase (for a total of 10 person-years of employment over that phase and an estimated total income of \$0.7 million for the phase) and one (1) part-time job during the Passive Post-closure Phase (for a total of 7.5 person-years of employment over that phase, and an estimated total income of \$0.6 million for the phase).

The total cost of Active Post-closure of the Minesite, with a duration of 10 years, is estimated at \$1.5 million, plus \$74,000 each year in labour cost (TCL employees), for a total of about \$2.2 million in expenditures. The total cost of Passive Post-closure of the Minesite, to occur over a 15 year period, is estimated at \$1.5 million, plus \$37,000 in labour cost each year during the phase (TCL employees only), for a total of about \$2.0 million in expenditures.

6.1.5 Indirect and Induced Benefits

Additional economic benefits (employment, procurement, government tax revenue, and GDP) in the LSA, RSA, and the province would be realized in supplier industries and through workers spending their income. These benefits are detailed in **S5.0 Economic Effects Assessment** of the **EAC Application**.

6.2 Education, Training, and Employment Program

6.2.1 Purpose

The purpose of the Education, Training, and Employment Program will be to detail TCL's support and effort to increase the capacity of the local labour force to qualify and obtain jobs at Project Construction and Operation, minimizing the risk of the potential in-migration to LSA communities, reducing competition for skilled labour, and removing barriers to employment for Indigenous workers and other underrepresented members of the workforce.

6.2.2 Mitigation Measures

The following mitigation measures will be addressed through the Education, Training, and Employment Program:

- ▶ Education and training support:
 - ▶ Provide training, targeting entry-level positions and on-the-job training where previous experience is not necessary;
 - ▶ Develop and implement a professional training plan to support training needs for the Project that can include specialized skilled training, such as apprenticeship programs for trades positions;
 - ▶ Support efforts on the part of employees to upgrade their education as a means towards job advancement;
 - ▶ Cooperate with local educational authorities and institutions, and the industry in general to develop and implement high school and college training with mining sector content;

- ▶ Cooperate with financial institutions to support financial resource needs required for training;
- ▶ Support the training of Indigenous people and cooperate with programs such as Indigenous Skills and Employment Training Program (ISET) to improve access to funding for Indigenous individuals and support skill building of the Indigenous workforce in the RSA;
- ▶ Cooperate with financial institutions to support financial resource needs required for training (e.g., a clear indication of workforce needs and intention to employ workers at the Project), given specific education can increase the likelihood of receiving a student loan;
- ▶ Indigenous Cultural Awareness Induction:
 - ▶ Work with the OW to develop and implement an Indigenous Cultural Awareness Induction Program to educate employees and contractors on how to work effectively with colleagues from different backgrounds, to strengthen relationships, and improve retention of Indigenous workers, and workers from other minorities or underrepresented groups;
 - ▶ design cultural awareness induction before the Construction Phase of the Project and provide it to Project employees, and contractors during the four (4) phases of the Project, continuously working to improve cultural awareness and acceptance.
- ▶ Communication measures:
 - ▶ Establish temporary Project recruitment offices in Smithers, Houston, Witset, and Telkwa prior to commencement of the Construction Phase;
 - ▶ Communicate Project schedules and the type and number of jobs to be required by phase, including required skills, education, responsibilities, and compensation;
 - ▶ Advertise employment opportunities for potential employees within the RDBN and contractors well in advance to provide job seekers with improved opportunity to obtain skills to qualify for employment and contracts at the Project;
 - ▶ Set and communicate local employment objectives to maximize local employment and income benefits, including employment for Indigenous workers and other underrepresented groups;
 - ▶ Host Employment Information Sessions in LSA/RSA communities during the Construction Phase of the Project to provide information about the opportunities associated with Project employment;
- ▶ Child Care Program:
 - ▶ TCL will share information about its projected workforce needs with child care service providers in the LSA so that they can anticipate and plan for the increased demand for services.
 - ▶ TCL will fund at least one (1) full-time position at a government approved child care facility in the RDBN that will be selected by TCL via an application process, with the provision that additional matching full-time positions are funded by government sources, and that preference is given to children of TCL employees for additional capacity created; and
 - ▶ TCL will also fund at least one (1) full-time position with Indigenous groups at an approved child care facility operated by an Indigenous group in the region that will be selected by TCL via an application process, with the provision that an additional matching full-time position is funded by Indigenous and/or government sources, and that preference is given to children of TCL Indigenous employees first, and then TCL non-Indigenous employees for additional capacity created.

6.2.3 Roles and Responsibilities

6.2.3.1 Health, Safety, and Human Resource Superintendent

The Health, Safety, and Human Resources Superintendent role is:

- ▶ to engage with prospective applicants and provide information about employment opportunities, qualifications, and the nature of working at the Project as well as liaise with the Indigenous workers at the Project to help address challenges at the workplace as they arise;
- ▶ to support the workers at the Project in health and well-being;
- ▶ to develop and support an Employee and Family Assistance Program to be available to employees and their families;
- ▶ to address specific health and well-being needs of the workers at the Project, as they arise;
- ▶ to develop (and review annually) health and well-being policies and procedures to suit the needs of the Project and the workers; and
- ▶ to provide workers with information and access to the resources this program provides and encourage their use. Evaluation and Reporting

6.2.4 Evaluation and Reporting

The following will be monitored and reported on to assist with evaluating the success or deficiency of this program:

- ▶ training program for each employee;
- ▶ skills matrix for each employee;
- ▶ training completed versus planned for the overall workforce;
- ▶ number and value of scholarships provided to employees and families to pursue additional educational or skill qualifications;
- ▶ providing overlapping positions that require employees to become knowledgeable in a broader sense;
- ▶ vacation relief opportunities for employees and students over the age of 18;
- ▶ employment ads will be provided at least 6 months ahead of planned positions if possible;
- ▶ a rating system developed to rank local potential employees higher than non-local employees; and
- ▶ pay and benefits for positions based within the RSA will be higher versus the same position if it exists outside of the RSA.

6.3 Procurement Program

6.3.1 Purpose

The purpose of the Procurement Program will be to support procurement from local and regional businesses, and to reduce the barriers to entry for contracting opportunities for local and regional businesses, to maximize economic benefits to those businesses. The Procurement Program will assist local and regional businesses in taking advantage of the opportunities to supply the Project directly and indirectly, and it will improve the understanding of procurement requirements and expectations.

6.3.2 Mitigation Measures

The following mitigation measures will be addressed through the Procurement Program:

- ▶ Advertise contracting opportunities well in advance of the goods or services being required to allow local suppliers to increase capacity, meet qualifying requirements, and prepare a competitive bid. TCL internal policy is to obtain at least three (3) received quotes for each good or service request for quote (RFQ);
- ▶ Provide smaller contracts to allow businesses with limited capacity to participate in the bidding process, and/or implement a multi-supplier procurement by allowing the breakdown of some larger contracts; and
- ▶ Improve the participation of Indigenous-owned businesses in the procurement process.

6.3.3 Roles and Responsibilities

The Buyer will be responsible for:

- ▶ developing local opportunities;
- ▶ improving understanding of the local/regional market;
- ▶ assisting interested local and regional businesses to understand Project needs; and
- ▶ assessing the availability of goods and services that could be sourced locally on a regular basis.

6.3.4 Evaluation and Reporting

The following will be monitored and reported on to assist with evaluating the success or deficiency of this program:

- ▶ value of contracts and services procured annually including origin and companies;
- ▶ number of Request for Proposal (RFP) provided and response from local region;
- ▶ development of requirements and qualifications 12 months prior to the Construction Phase to give local companies time to obtain these;
- ▶ an open website location where local companies can fill in details about their company so that they can be included in subsequent RFPs; and
- ▶ open houses to be held annually to describe opportunities coming available in the next 12 months.

6.4 Health and Wellness Program

6.4.1 Purpose

The purpose of TCL's Health and Wellness Program is outline TCL's commitments to the well-being of all workers including physical and mental health, safety, and wellness, and will focus on early identification, prevention and management of health and safety issues, 'fit for work' policies, and other measures. TCL will develop a Health and Wellness Program as part of the Project's **Occupational Health and Safety Program (S13.0-C13) (OHSP)**, including a corporate policy statement expressing the company's commitment to the health and well-being of all employees and contractors including physical and mental health, safety, and wellness.

6.4.2 Mitigation Measures

The following mitigation measures will be addressed/developed through the Health and Wellness Program:

- ▶ health and well-being messaging in the context of health and safety induction such as physical activity, healthy eating, tobacco reduction, vaping reduction, cannabis consumption, alcohol and prescription medication consumption, stress prevention, family planning, and sexual health;
- ▶ indicators to monitor the well-being of workers and LSA/RSA community members that favour early identification and management of issues;
- ▶ an annual evaluation of actions and programs implemented for worker health and wellness, as well as new or adaptive management strategies, as required;
- ▶ access to counselling, financial planning, and other resources (as part of an Employee and Family Assistance Program);
- ▶ “fit for work” policies and procedures, such as no drugs, alcohol, smoking, or vaping within the Project Area;
- ▶ policies and procedures on treatment for substance abuse or other issues, including leave time and re-hiring considerations and employee work modification programs; and
- ▶ onsite/online access to readings or other resources on community well-being, mental health and self-care.

In addition to worker health and LSA/RSA community members, the OHSP may also relate to community health and well-being. This SEMP has been discussed with LSA/RSA communities and Indigenous groups regarding those aspects considered relevant.

6.4.3 Roles and Responsibilities

The Health, Safety, and Human Resources Superintendent role is to:

- ▶ support the workers at the Project in health and well-being;
- ▶ develop and support an Employee and Family Assistance Program to be available to all employees and their families;
- ▶ address specific health and well-being needs of the workers at the Project, as they arise;
- ▶ develop (and review annually) health and well-being policies and procedures to suit the needs of the Project and the workers; and
- ▶ provide workers with information and access to the resources this program provides and encourage their use.

6.4.4 Evaluation and Reporting

The following will be monitored and reported on to assist with evaluating the success or deficiency of this program:

- ▶ number of lost time incidents, medical aids, high potential risks and fatalities;
- ▶ results of Minesite emergency practice drills or actual deployments;
- ▶ number of employees making use of the health and wellness accounts and funds used;

- ▶ overall trends of performance indicators for employee health and wellness, based on annual medical monitoring program; and
- ▶ number and value of sponsorship and donations provided to the region and groups selected for these funds.

6.5 Community Engagement Programs

6.5.1 Purpose

The purpose of Community Engagement Programs is to deliver an appropriate community engagement process to allow for efficient and timely delivery of information on Project activities, schedule, employment, and procurement opportunities. The program will have a feedback mechanism to efficiently collect, track and manage feedback and concerns received from stakeholder and TCL's responses to those communications.

Public consultation is integral to creating and maintaining relationships and open communication with the local community and interested parties, and as such, will occur over the lifetime of the Project. Project engagement with the local community and interested parties was initiated in early 2017. **S12.0 Public Consultation** in the **EAC Application** highlights the characteristics of the consultation held and planned during all Project phases including: Early Engagement; Pre-application; Application Review; and Ongoing Engagement.

To foster positive interactions with local community and stakeholders, TCL has been developing and implementing a Public Consultation Plan designed to achieve the following objectives:

- ▶ engage in early, frequent, open, and candid communication to build strong relationships with interested parties, particularly those who may be potentially affected by the Project;
- ▶ communicate information in a timely, consistent manner to local community members, regulators, and stakeholders throughout the Project to build awareness of the Project, including potential effects and proposed mitigation measures;
- ▶ identify and understand Project issues and concerns, as well as ensuring responsive engagement regarding stakeholder interests;
- ▶ create and facilitate opportunities for the community and stakeholders to provide meaningful input and feedback on the Project;
- ▶ respond to comments received on the Project and documents related to the EAC Application process using tracking tables and other documentation methods;
- ▶ foster strong, collaborative, and long-term partnerships with regulators, community groups, and other stakeholders; and
- ▶ gather input and feedback on the Project from the local community and stakeholders and ensure it is considered during Project planning.

The Community Engagement Programs will also involve regular and ongoing engagement with stakeholder groups most likely to be concerned and affected by the Project, including:

- ▶ Indigenous groups, including the OW, Wet'suwet'en First Nation, and Witset;
- ▶ local and regional authorities and representatives such as the Village of Telkwa, the Town of Smithers and the RDBN;

- ▶ local community such as Tenas Mine Neighbours and other Bulkley Valley residents;
- ▶ local recreation groups including Back Country Horsemen of BC, Bulkley Valley Bowmen, Smithers Snowmobile Association, Upper Skeena Angling Guides Association and other guide outfitters;
- ▶ local community groups such as Bulkley Valley Community Resource Board, Skeena Watershed Conservation Coalition, Smithers Chamber of Commerce, Smithers Exploration Group, Trout Creek Fish Hatchery;
- ▶ other local non-governmental organizations; and
- ▶ members of the local and regional workforce potentially interested in work at the Project.

Community consultation provides an opportunity for stakeholders to express their concerns, ask questions, and get a clearer understanding of Project effects and associated mitigation measures. Sustained stakeholder engagement activities is expected to contribute to positive interactions between the Project and community members from the LSA and the RSA and are likely to foster a climate of collaboration and trust. Through the implementation of Community Engagement Programs, the Project's goal is to operate as a good neighbour to the residents of the LSA, well-integrated in the social fabric of the Bulkley Valley where mining was accepted activity in the past.

6.5.2 Mitigations

Building on the Public Consultation Plan (**S12.0 Public Consultation** of the **EAC Application**), TCL's Community Engagement Programs (for Construction, and Operation phases of the Project) will include the following to allow a successful Public Consultation Plan:

- ▶ open-door policy;
- ▶ general engagement meetings and presentations;
- ▶ company website;
- ▶ social media;
- ▶ Project tours;
- ▶ participation at community and industry events; and
- ▶ neighbours' group(s),
- ▶ Project Access Committee,
- ▶ Project Advisory Committee, and
- ▶ sponsorship.

6.5.3 Roles and Responsibilities

The Mine Manager is responsible to:

- ▶ develop and support a Community Engagement Committee that engages local community stakeholders, representatives of government departments, and TCL staff to discuss environmental management, Minesite development and performance, and community partnerships;
- ▶ oversee the Minesite sponsorship program; and
- ▶ develop policies and procedures for general community communication, Minesite tours, sponsorship support, and participation in community and industry events.

The Environmental Coordinator is responsible to:

- ▶ collect relevant monitoring data for of the Project; and
- ▶ support the distribution of monitoring data in an accurate and timely manner.

6.5.4 Evaluation and Reporting

The following will be monitored and reported on to assist with evaluating the success or deficiency of this program:

- ▶ number of engagement meetings;
- ▶ actions, status and results of all commitments made to stakeholder and Indigenous groups;
- ▶ minutes and agenda of meeting provided in the **SEMP** report;
- ▶ use of complaints hotline and actions completed in response; and
- ▶ monitoring data for the Project provided via website.

6.6 Housing and Accommodation Program

6.6.1 Purpose

The purpose of the Housing and Accommodation Program is to assist employees of TCL to own permanent housing in the region around the proposed Project, and to manage the accommodation of the temporary construction workforce effect on the surrounding region.

6.6.2 Mitigation Measures

To understand the mitigations that might be required for housing and accommodation related to the Construction Phase workforce, TCL's Community Liaison Officer conducted surveys and interviews with residents and local accommodation facilities, bed and breakfasts, and Airbnb's regarding possible use for temporary construction crews between January and March 2021.

The Construction Phase of the Project will be an intensive process. Construction will be the period that most people will be involved with the Project on a temporary basis, as well as the time that most non-local people will be working at the Project. The construction of the Minesite will likely overlap with some production related work as well. TCL has always expressed intentions of using as much of the local workforce as possible, but during the Construction Phase there will be some need for non-local experienced workers.

These workers could use a number of different options for accommodations such as hotels/motels, bed and breakfasts, Airbnb style accommodations, or recreational vehicle (RV) parks. To better understand the availability of short-term accommodations, hotels in the RSA were also surveyed on the potential of renting their rooms for periods of time up to 6 months.

The sequence of activities is such that the maximum workforce is not required on the first day of the Construction Phase but is slowly built up over a period of several years. The Operation Phase will have a similar progression regarding the maximum workforce required to be in residence near the Project. Due to the phased progress of activities, TCL will also have a phased approach to hiring personnel for the Minesite.

This will give time for the housing market to respond with increased construction of temporary and permanent accommodations in the area.

Table 6.6-1 below provides a summary of the room availability in the RSA in total percentage which the owners indicate could be made available without causing conflict with regular clients. This is based on establishments being given six (6) months advance notice to plan, and TCL has made a commitment of renting the rooms for a minimum six (6)-month period during the Construction Phase. Several of the hotels consider work crews their primary clients and can make large numbers of their rooms available to TCL.

Table 6.6-1: Summary of Temporary Accommodation Providers

Hotel Name	Location	Rooms without Kitchens	Rooms with Kitchens	Suites *	Total Rooms	Rooms Available to TCL (%)	Rooms Available to TCL **
Florence Motel	Smithers	8	13	2	23	75	17
Houston Motor Inn	Houston	44	9	2	55	40	22
Mountain View Motel	Smithers	3	30	6	39	40	16
Pleasant Valley Motel	Houston	48	4	0	52	30	16
Prestige Hudson Bay Lodge	Smithers	79	20	2	101	25	25
Sandman Inn	Smithers	30	0	5	35	25	9
Stork Nest Inn	Smithers	18	3	0	21	50	11
Sunshine Inn Smithers	Smithers	36	6	4	46	20	9
Sunshine Inn Houston	Houston	26	8	2	36	20	7
Twin Valley Inn	Smithers	12	0	0	12	60	7
Aspen Inn	Smithers	50	10	4	64	20	13
Fireweed Motel	Smithers	13	7	1	21	65	14
Capri Motor Inn	Smithers	59	2	2	63	50	32
SUBTOTALS	Smithers	308	91	26	425	36	152
	Telkwa	0	0	0	0	0	0
	Witset	0	0	0	0	0	0
	Houston	118	21	4	143	31	45
TOTAL		426	112	30	568	35	197

Source: Motel staff 2021

Notes: * small apartment with at least one bedroom separate from the rest of the living area; ** based on six (6) to 12 month notice and booking for minimum 6 month stay with cancellation fees; %=percent

Neither Witset nor Telkwa have accommodation options that would be considered hotels, although they do have other options like recreational vehicle (RV) parks, and bed and breakfasts that workers may be interested in; notwithstanding, the summary of options in **Table 6.6-1** would more than allow for full accommodation.

With respect to longer term accommodations for full-time TCL employees, fortunately most communities have recently completed housing studies. This was made possible by grants through Northern Development Initiative Trust (NDIT) whereby the communities of Telkwa, Smithers, Houston, and the RDBN have recent data on housing in the region (RDBN 2020).

There are two (2) significant residential areas in the region that are being developed, and these are Ambleside Park in Smithers, and Blissful Grove in Telkwa.

Ambleside is a residential development in Smithers that borders on existing industrial land. The developer has 105 building lots on 44 acres, with the intention of adding another 20+ lots to an additional seven (7) acres recently purchased. The development has completed Phases 1 through 4, with most of the properties already having been developed (Dobinson 2021).

Blissful Grove is a newer proposed development of 60 building lots in Telkwa. The development is to happen over the next 15 years (Interior News 2021). Blissful Grove may expand to have as many as 65 lots being developed in six (6) phases. Phase 1 is expected to start in 2021.

Based on this research, TCL has developed mitigations specific to the temporary workforce associated with the Construction Phase, and the permanent workforce associated with the Operation Phase.

6.6.2.1 Construction Workforce Accommodation

TCL will fund the accommodation of non-local experienced personnel that the company requires during the Construction Phase. The following mitigations were developed for this group:

- ▶ A Request for Proposal (RFP) will be provided to accommodation providers at least six (6) months prior to use by the Project construction workforce, and the RFP will be for a set number rooms for a guaranteed duration of time;
- ▶ Reservations will be made at various campgrounds and RV parks to allow the Project construction workforce to use some of these facilities;
- ▶ Discussions with groups in Telkwa, Smithers and Houston for the temporary rental of rooms for the construction workforce will be secured at least six (6) months prior to use; and
- ▶ TCL will endeavour to use local companies to complete most of the construction activities for the Project to reduce the requirement for temporary accommodation.

6.6.2.2 Permanent Workforce Accommodation

The following mitigations were developed for accommodating the permanent workforce for the Operation Phase:

- ▶ Grants to be used for the purchase or upgrade of permanent local housing will be provided to employees who reach designated milestones with the company;
- ▶ TCL will work with local developers to provide guaranteed rental rates and duration to incentivize the construction of accommodation for permanent employees and communities at large; and
- ▶ TCL will provide transportation from both Houston and Witset if at least six (6) employees reside in these locations to promote alternatives for employees to reside and still be within a reasonable driving distance (less than 90 minutes) from the Project.

6.6.3 Roles and Responsibilities

The Mine Manager's role is to:

- ▶ provide adequate resources and personnel support to facilitate this program; and
- ▶ work with communities and developers to support employees with housing needs.

The Health, Safety, and Human Resources Superintendent's role is to:

- ▶ set up and maintain a transportation service to limit traffic increases and allow a safe reliable system for travel to and from the Minesite;
- ▶ preferentially hire local workers, and support relocation of hired workers to the local communities; and
- ▶ develop relationships with local short-term accommodations providers to ensure that no one location is overloaded.

6.6.4 Evaluation and Reporting

The following will be monitored and reported on to assist with evaluating the success of this program:

- ▶ number of rooms acquired and used;
- ▶ number of construction employees, origin of location and company;
- ▶ amount of funds used by employees for securing permanent accommodation;
- ▶ number of housing units developed through TCL's assistance; and
- ▶ number and origin of location for employees.

6.7 Decommissioning and Reclamation, and Post-closure Program

6.7.1 Purpose

The closure of the Project is an event expected to occur once mineable resources for the Project are exhausted, and the Decommissioning and Reclamation phase is completed. The purpose of the Decommissioning and Reclamation, and Post-closure Program is to lay out the plan to help employees identify and secure new employment. The program will be developed in the early stages of the Operation Phase (by the end of Year 5) to solicit feedback from stakeholders and will be refined halfway through when the actual completion of mining is better understood and defined.

6.7.2 Mitigation Measures

The mitigations that will be put in place as part of this program are:

- ▶ identification of all employees who are expected to be under the age of 55 at the expected closure of the Project, and developing a training program for each employee to increase the number of transferrable skills and qualifications to allow for an easier job transition;
- ▶ providing a matching Registered Retirement Savings Plan (RRSP) program to promote employee's saving and getting prepared for retirement;

- ▶ providing financial education programs for employees so that they understand retirement planning and saving;
- ▶ working with other industries in the region, to gain an understanding of what skills and qualifications are lacking and provide opportunities for TCL employees to attain these skills and qualifications to facilitate employee transition to other industries after their employment ends with TCL;
- ▶ provision of a Legacy Fund to continue to provide donations, and sponsorship opportunities for educational programs to former employees, employee spouses and dependents; and
- ▶ work with Indigenous groups to determine if a community forest model is possible for reclamation to provide a lasting employment and funding source to the community.

6.7.3 Roles and Responsibilities

The Mine Manager will:

- ▶ provide adequate resources and personnel to carry out this program;
- ▶ support cross training and professional development during Minesite operations; and
- ▶ attend engagement activities with community and Indigenous groups.

The Environmental Coordinator will:

- ▶ lead the collection of data related to the SEMP metrics for performance;
- ▶ conduct an annual review of the **Reclamation and Closure Plan (S13.0-C15) (RCP)**, considering community and Indigenous land use suggestions; and
- ▶ attend engagement activities with community and Indigenous groups.

The Health, Safety, and Human Resources Superintendent will:

- ▶ assist the Environmental Coordinator to collect information required by the SEMP for offsite metrics;
- ▶ attend engagement activities with community and Indigenous groups;
- ▶ develop a training program for employees; and
- ▶ develop a program for RRSP and financial training.

6.7.4 Evaluation and Reporting

The following will be monitored and reported on to assist with evaluating the success of this program:

- ▶ value of the Legacy Fund and amount of money distributed through the fund;
- ▶ number of employees accessing the RRSP and total value;
- ▶ number of training programs completed;
- ▶ percentage of employees completing transitioning program; and
- ▶ percentage of employees with transferrable skills and top skills completed.

7. MONITORING

In addition to monitoring discussed in the programs listed in 6., in support of the SEMP, an inspection and monitoring program will be developed for the overall SEMP and the results reported in the annual SEMP report.

7.1 Performance Objectives

In addition to extensive inspections and monitoring to ensure the objectives of the SEMP are met, performance objectives and targets are set to guide the proper implementation of the SEMP. They are shown in **Table 7.1-1**:

Table 7.1-1: Performance Objectives

Objective	Target
Project workforce numbers, demographics, and ethnicity reflects local demographics	- To achieve at least 80 percent (%) of the workforce to be a resident of the Regional District of Bulkley-Nechako (RDBN). - To have a workforce that reflects the demographics for the RDBN.
Value of contracts and services including origin and details on provider	To achieve at least 50% of contracts and services from the RDBN.
Value of Housing and Accommodation Program grants to employees	To achieve at least 25% of employees taking advantage of this program in the first two years after construction.
Donations, and sponsorship amounts and groups that received them are local	100% of all donations and sponsorship amounts directed to groups and residents of RDBN.
Value of Legacy Fund	To be determined two (2) years after construction is finished based on consultation with Indigenous groups and other stakeholders.
Workforce participation in Childcare Program based on number and value of positions created is achieved	To achieve at least one (1) full time equivalent person is regional daycares within 5 years after construction is completed. Have 100% of employees who require childcare to have employment at the operation. Trial a flexible work shift for employees who require it to assist with childcare.
Skill matrix for employee workforce is completed	- To have a skill matrix for all employees provided every two (2) years after employee is hired. - To complete a training program for every employee for subsequent positions at the mine and alternative industries. - To complete a transition plan for every employee who will be less than 55 years old when the mine is planned to close.
Results of community and Indigenous engagement activities are obtained and reviewed	To have an annual discussion with Indigenous groups and stakeholders to solicit input and feedback on activities to date and provide an update on future development. The actions will be posted on the Telkwa Coal Limited (TCL) website.

Objective	Target
Community Services and Infrastructure is supported	▪ To have at least two employees participate in the Telkwa or Smithers volunteer fire departments or search and rescue. ▪ To fund a portion of an ambulance capable of advanced life support for Smithers. ▪ To establish mutual aid agreements with Smithers, Telkwa, Houston and Witset within 2 years after construction is completed. ▪ To establish mutual aid agreements with key large industries such as Red Chris, Brucejack and PIR.
Community cohesion is maximized	▪ To have a donations and sponsorship program to support local community events and organizations. ▪ To have two annual events for employees and the community, with one event in winter family day and one for the welcome to summer barbeque in June. ▪ To have monthly tours of the mine for visitors in the summer months in coordination with the Telkwa and Smithers Visitor center. ▪ To participate in an annual food drive in December of every year after construction is complete. ▪ To participate in annual clean up the streets program in Telkwa on annual basis after construction is complete. ▪ To participate in annual presentations at local high schools on opportunities.

8. REPORTING

8.1 General Reporting

Reporting completed by TCL will confirm consistent implementation of the SEMP. Summary reports of evaluation activities and results will be compiled and reviewed annually. Other details about reporting relative to the specific programs in this SEMP are further described in **6.2.4, 6.3.4, 6.4.4, 6.5.4, 6.6.4, 6.7.4.**

8.2 Compliance Reporting

Compliance reporting will be subject to the EAC and *MA/EMA* permit conditions where applicable. The information gathered during monitoring practices will be summarized with information from other management plans into an Annual Environmental Management Summary Report, and upon permitting completion, the Annual Environmental Reports as required by *MA/EMA* permits.

Community engagement activities will be an aspect of the SEMP. The SEMP will have requirements related to reporting on community engagement programs.

An annual SEMP report is a likely requirement of the conditions of the EAC. As described in **3.0 Scope and Scale**, the annual SEMP will help to verify the accuracy of predicted socio-economic effects and the effectiveness of implemented mitigation measures and help to identify unexpected socio-economic issues or challenges and/or implement additional mitigation measures if required.

Furthermore, other regulatory reporting responsibilities will be fulfilled as required.

8.3 Internal Reporting

TCL will prepare an annual SEMP report detailing the Project's performance against the plans and strategies listed in this SEMP, including annual disclosure of information about the Project workforce, suppliers and contractors, and community engagement. The SEMP report will also provide an update on the effectiveness of mitigation measures for identified socio-economic effects, and any adaptive management changes in response to new or evolving issues.

TCL's approach to annual monitoring and reporting, and specific monitoring objectives, content and reporting will be outlined in the fully developed SEMP Annual Report prior to the start of the Construction Phase.

9. ROLES AND RESPONSIBILITIES

Primary responsibilities are assigned to the roles or groups as described below. Furthermore, roles and responsibilities specific to the programs presented in this SEMP are included in **6.2.3, 6.3.3, 6.4.3, 6.5.3, 6.6.3, 6.7.3**.

9.1 Mine Manager

The Mine Manager bears overall responsibility for all phases of the Project, and responsibility for onsite environmental monitoring and compliance relating to Construction, Operation, Decommissioning and Reclamation, and Post-Closure phase activities. The Mine Manager reports to the executive steering committee for TCL and will coordinate with this group to ensure that Project objectives are being met.

Specifically, the Mine Manager will:

- ▶ provide adequate resources and personnel to carry out the SEMP;
- ▶ assist in the annual review of SEMP activities; and
- ▶ attend engagement activities with community and Indigenous groups.

9.2 Environmental Coordinator

The Environmental Coordinator will:

- ▶ assist with the set up system to collect information required by the SEMP for offsite metrics;
- ▶ assist in the annual review of SEMP activities; and
- ▶ attend engagement activities with community and Indigenous groups.

9.3 Health, Safety, and Human Resources Superintendent

The Health, Safety, and Human Resources Superintendent will:

- ▶ set up a system to collect information required by the SEMP for site employees;
- ▶ assist the Environmental Coordinator with setting up a system to collect information required by the SEMP for offsite metrics;
- ▶ attend engagement activities with community and Indigenous groups;
- ▶ develop a training program for employees; and
- ▶ develop program for RRSP and financial training.

9.4 Buyer

The Buyer will:

- ▶ purchase locally where practical and economic;

- ▶ work with local suppliers and vendors to identify opportunities to increase the amount of material and supplies sourced locally; and
- ▶ track local and regional sourcing, and report to the Mine Manager on the amount of material and supplies that were sourced locally.

10. COMMUNICATION

Communication of the SEMP at TCL will be based on internal requirements and will primarily take place through this SEMP and relevant SPPs. Any significant change to the SEMP will be communicated to the Project's employees and contractors through a site-wide email, announcements over all radio channels by Minesite supervision and bulletins posted around the Project's Minesite. When effective to do so, maps will be marked with changes.

10.1 Training and Awareness

All employees will receive training in the SEMP in order to increase their awareness of socio-economic issues related to the Project. Training will be provided at a level appropriate to the employee's role.

10.2 Employee Training

Employees are required to review all relevant management plans and/or SPP and their associated training modules at the start of employment and on annual basis. Employee training is tracked by the Health, Safety, and Human Resources Department using an industry standard software application.

10.3 Contractor and Visitor Training

Contractors will review the relevant management plans and/or SPP at the start of their contract and on an annual basis if contracts are longer than 13 months in duration to ensure their compliance with these requirements. Visitors will receive an overview of the relevant SPPs during their visitor induction session prior to accessing the Minesite or from their Contract Manager. Visitors are generally restricted to being under the direction of TCL employees.

11. EVALUATION AND ADAPTIVE MANAGEMENT

11.1 Evaluation

A review of the SEMP will be completed by the Environmental Coordinator and Mine Manager on an annual basis to ensure that the mitigations put in place are meeting the requirements set out in the EAC. This process will include a review of the management plan deliverables and input received from Indigenous groups and community members through Community Engagement Programs which are a part of the SEMP.

Other details about evaluation relative to the specific programs in this SEMP are further described in **Sections 6.2.4, 6.3.4, 6.5.4, 6.6.4, 6.7.4.**

11.2 Adaptive Management

A philosophy of adaptive management will be adopted to make sure that management plans and mitigation measures are consistently meeting or exceeding performance targets. This will be achieved through periodic reviews of the SEMP and the results of monitoring programs.

11.3 Continual Improvement

TCL will work towards continual improvement at the Project. The Mine Manager or their delegate will investigate improvements in any trend and assess whether the practices responsible for the improvements can be applied to other areas of the Project. Deteriorating trends will be studied to determine the root cause. When the cause is identified, the Mine Manager or their delegate will implement a suitable corrective action. Examples of corrective actions could include:

- ▶ finding alternate or additional mitigation measures to further minimize air emissions;
- ▶ additional training of employees and contractors on procedures;
- ▶ enhancement of maintenance or monitoring measures; and/or
- ▶ additional supervisory oversight.

TCL will amend the SEMP as required based on annual evaluations, monitoring, and feedback from stakeholders and Indigenous groups.

12. CHANGE MANAGEMENT

Changing any part of the SEMP requires the use of a formalized process. If significant changes are being planned to objectives, management plan structure, operational milestones, communication and/or information management, it is required that the Management of Change Procedure in the **EMS** be followed. Minor edits and/or updates to this SEMP will be controlled through version control and content approval functions.

13. CONCLUSION

The SEMP will be utilized by TCL to mitigate potential effects on the socio-economic conditions of all employees and residents of the RSA. In doing so, TCL believes that the strategies summarised in the SEMP will provide more than a “do no harm approach” and will be an approach that focuses on leaving behind positive socio-economic legacies in the region.

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