



BC EAO EAC Application – Tenas Project

Section 14.0 Follow-up Strategy

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ABBREVIATIONS AND ACRONYMS

Abbreviation or Acronym	Long Form of Abbreviation or Acronym
3D	three-dimensional
ALR	Agricultural Land Reserve
AQMP	Air Quality Management Plan (S13.0-C2)
ARD	acid rock drainage
BC	British Columbia
BC EAO	British Columbia Environmental Assessment Office
BC MECCS	British Columbia Ministry of Environment and Climate Change Strategy
BC MEMLI	British Columbia Ministry of Energy, Mines and Low Carbon Innovation
BC MFLNRORD	British Columbia Ministry of Forests, Lands, Natural Resource Operations and Rural Development
BMPs	best management practices
C	Chapter
CAC	criteria air contaminants
CCME	Canadian Council of Ministers of the Environment
CEA	cumulative effects assessment
CEMP	Construction Environmental Management Plan (S13.0-C4)
CEPA	Canadian Environmental Protection Act, 1999, SC 1999, c 33
CMSTHP	Chemicals and Materials, Storage, Transfer, and Handling Plan (S13.0-C3)
CMT	culturally modified tree
DMP	Discharge Management Plan (S13.0-C5)
EAC	Environmental Assessment Certificate
ECCC	Environment and Climate Change Canada
EMS	Environmental Management System (S13.0-C1)
EMP	Explosives Management Plan (S13.0-C6)
FIFO	Fly-In-Fly-Out
FMSPCP	Fuel Management and Spill Control Plan (S13.0-C7)
GHG	greenhouse gas
GovCan	Government of Canada
HADDs	harmful alteration, destruction, or disruption of fish habitats
HHMP	human health monitoring program
HRMP	Heritage Resources Management Plan (S13.0-C8)
IDZ	Initial Dilution Zone
IEM	Independent Environmental Monitor
LSA	Local Study Area

Abbreviation or Acronym	Long Form of Abbreviation or Acronym
MA/EMA	<i>Mines Act</i> , RSBC 1996, c 293, and <i>Environmental Management Act</i> , SBC 2003, c 53
MERP	Mine Emergency Response Plan (S13.0-C9)
MIC	Mine Infrastructure Complex
ML/ARDMP	Metal Leaching (ML)/Acid Rock Drainage (ARD) Management Plan (S13.0-C12)
MPI	Major Projects Inventory
ML/ARD	metal leaching/acid rock drainage
MOC	Management of Change
MWMP	Minesite Water Management Plan (S13.0-C11)
MTCP	Minesite Traffic Control Plan (S13.0-C10)
NPRI	National Pollutant Release Inventory
OW	Office of the Wet'suwet'en
PAMP	Public Access Management Plan (S13.0-C14)
POC/COC	Parameters of Concern/Contaminants of Concern
POPC/COPC	Parameters of Potential Concern/Contaminants of Potential Concern
PM	particulate matter
PPR	Private Property Receptor
Project	Tenas Project
PSP	Permanent Sample Plots
RCP	Reclamation and Closure Plan (S13.0-C15)
RCPLALR	13.15-A Reclamation and Closure Plan for Lands within the Agricultural Land Reserve (ALR)
QA/QC	Quality Assurance/Quality Control
QP	Qualified Professional
ROM	run-of-mine
RSA	Regional Study Area
S	Section
SBEB	scientifically-based environmental benchmark
SEMP	Socio-economic Management Plan (S13.0-C16)
SEPSCP	Surface Erosion Protection and Sediment Control Plan (S13.0-C17)
SMP	Soil Management Plan
SSWQO	site-specific water quality objective
TAC	Tenas Access Corridor
TARP	Trigger Action Response Plan
TCL	Telkwa Coal Limited
TK	Traditional Knowledge
VC	Valued Component

Abbreviation or Acronym	Long Form of Abbreviation or Acronym
VMP	Vegetation Management Plan (S13.0-C18)
VRMP	Visual Resources Management Plan (S13.0-C19)
WMP	Wildlife Management Plan (S13.0-C21)
WMPRE	Waste Management Plan for Refuse and Emissions (S13.0-C20)

UNITS OF MEASURE

Abbreviation or Acronym	Long Form of Abbreviation or Acronym
µm	micrometre
%	percent
PM _{2.5}	particulate matter with diameter equal to or less than 2.5 micrometres (µm)
PM ₁₀	particulate matter with diameter equal to or less than 10 micrometres (µm)

EXECUTIVE SUMMARY

This Follow-up Strategies section provides:

- ▶ a description of the monitoring and follow-up programs TCL will implement, including activities, objectives, and reporting; and
- ▶ reporting structure as identified within the management plans and monitoring plans.

A summary of the effects assessment for the Valued Component (VC) sections (Section [S] 4.0 to S8.0) was conducted by qualified professionals (QP) and the predicted residual and cumulative effects rating for each VC is provided.

In **2. Reporting Structure** the primary operations, environmental, and safety roles within the organization and a general Project organizational structure are presented.

1. FOLLOW-UP STRATEGIES FOR EACH VALUED COMPONENT (VC)

Each Valued Component (VC) chapter in the Tenas Project (Project) Environmental Assessment Certificate (EAC) Application contains a summary of the effects assessment that was conducted by Qualified Professionals (QP), along with the proposed follow-up strategies, including monitoring and follow-up programs to assess the effectiveness of the measures implemented to minimize the predicted effects on the VC, if applicable.

To verify the efficacy of the follow-up strategies, including monitoring and follow-up programs identified for the Project VCs, and to assess the measures implemented to minimize the predicted effects on these VCs, management plans have been developed to provide mitigation measures and BMPs. The plans are presented in **Section (S) 13-Chapter (C) 1 to S13.0-C21** of this **EAC Application** and are described below, if relevant to each VC.

To manage the successful implementation of these management plans, performance objectives are established for each plan, and on an annual basis, the management plans and related performance objectives will be reviewed by designated employees in the reporting structure (see **2. Reporting Structure**), and as necessary, updated using the Management of Change (MOC) process in the **EMS**.

1.1 Atmospheric Environment Valued Component (VC) (S4.0-C1)

The Project has the potential to result in the following potential effects to the Atmospheric Environment VC subcomponents:

- ▶ Air Quality: increase in ambient critical air contaminants (CAC) concentrations;
- ▶ Greenhouse Gas (GHG) Emissions: increase in GHG emissions; and
- ▶ Noise: increase in ambient noise levels.

Changes in air quality and noise were predicted to remain below relevant guidelines and thresholds at sensitive receptors. Changes in GHG emissions were predicted to be small relative to provincial and federal totals, and within the industry profile. Therefore, potential residual effects on the Atmospheric Environment VC were rated as **Not Significant**. Cumulative effects on the Atmospheric Environment VC were rated as **Not Significant**.

To verify the accuracy of anticipated residual effects and the efficacy of mitigation measures, the baseline air quality monitoring station located at Private Property Receptor (PPR) 2 will be maintained to collect continuous measurements of particulate matter (PM) with diameter equal to or less than 10 micrometre (μm) (PM_{10}) and $\text{PM}_{2.5}$ concentrations associated with the Project. Air quality monitoring will be supported by a meteorological weather station that will be installed at the Mine Infrastructure Complex (MIC) or Explosive Facility to measure temperature, precipitation, snow amounts, wind speed, and direction. The meteorological station will consist of an instrument such as a RM Young 05305 wind sensor, installed at a height of 10 m above the ground, and programmed to automatically log data at hourly intervals. This will be supported by obtaining data from government weather stations in Smithers and Telkwa.

If ambient concentrations more than 40 percent (%) above the predicted concentrations from dispersion modelling are observed, an investigation will be conducted to determine the need for additional mitigation. As described in the **Air Quality Management Plan (S13.0-C2) (AQMP)**, a philosophy of adaptive management will be adopted to meet or exceed ambient air quality criteria and verify that proposed

mitigation measures are effective. Reporting completed by TCL will confirm consistent implementation of the **AQMP**.

Summary reports of monitoring activities and results will be compiled and reviewed annually, including the **AQMP** performance objectives. Compliance reporting will be subject to the EAC and *MA/EMA* permit conditions. As mandated by the *Canadian Environmental Protection Act*, 1999, SC 1999, c 33 (Government of Canada [GovCan] 1999) (*CEPA*), TCL will also report CACs, GHGs, and other required emissions data annually to the National Pollutant Release Inventory (NPRI) (Environment and Climate Change Canada [ECCC] 2020).

1.2 Terrain and Soils Valued Component (VC) (S4.0-C2)

The Project will be developed to design-specifications so that a safe and stable landscape exists during all Project phases. Project activities will be planned and sequenced to account for terrain stability, soil erosion and soil conservation to the extent practical. Mitigation measures were designed and implemented to monitor and maintain Terrain Stability and Soil Quality (the Terrain and Soils subcomponents) during all Project phases. The mitigation being proposed is based on industry BMPs, procedures, and proven/accepted mitigation used on other similar projects. After mitigation, Project residual effects for both Terrain Stability and Soil Quality should mostly be within the limits of the natural range of variability or, otherwise, at the limits of the natural range of variability. Upon further characterisation and determination of Likelihood and Significance, the residual effects for the Terrain and Soils VC are expected to be **Not Significant**. The Level of Confidence for this prediction is High.

As described in management plans specific to Terrain Stability, including the **Surface Erosion Protection and Sediment Control Plan (S13.0-C17) (SEPSCP)**, the **Vegetation Management Plan (S13.0-C18) (VMP)**, and the **Reclamation and Closure Plan (S13.0-C15) (RCP)** and its appendices **13.15-A Reclamation and Closure Plan for Lands within the Agricultural Land Reserve (ALR) (RCPLALR)** and **13.15-B Soil Management Plan (SMP)**, TCL is committed to:

1. provide a safe and stable landscape during all Project phases; and
2. reinstate Terrain and Soils to an equivalent land capability in a manner that aligns with the desired end-land use(s) and regulatory requirements at the completion of the mining tenure.

Project design and mitigation have been proposed to eliminate or reduce Project effects pertaining to the Terrain and Soils VC. Geotechnical monitoring will be implemented in accordance with other mitigation and management plans specific to Terrain Stability, including the **SEPSCP**, **VMP**, and **RCP**. Monitoring of soil salvage activities will be implemented in accordance with these management plans. Soil salvage will be conducted under the guidance and supervision of a QP.

The **VMP** and **RCP** also requires the monitoring of Parameters of Potential Concern/Contaminants of Potential Concern (POPC/COPC) and Parameters of Concern/Contaminants of Concern (POC/COC) identified for aquatic life, wildlife, terrestrial vegetation, human health, and land uses will be conducted for soils, vegetation, sediment, and surface and groundwater.

Reclamation of the Project Area and reinstatement of Terrain and Soils to an equivalent land capability on Agricultural Land Reserve (ALR) and non-ALR land is contingent (in part) on effectively salvaging soil and then maintaining soil quantity and quality as a viable growth substrate until implementation of the Reclamation and Closure Phase.

1.3 Surface Water Valued Component (VC) (S4.0-C3)

The Project-related residual effects on the Surface Water VC subcomponents were predicted to be **Not Significant**. All Project-related residual effects were carried forward into the cumulative effects assessment (CEA) and were assessed in relation to their overlap in time and space with the comparable residual effects of other projects and activities within the Surface Water Regional Study Area (RSA). Future forest, mining or agricultural activities are expected to have the greatest contribution to cumulative effects on the Surface Water VC, however, this is expected to be mitigated with the implementation of regulatory guidance and requirements in their permit conditions. Considering this, the cumulative effects are not expected to alter the integrity of the Surface Water VC within the Surface Water RSA beyond an acceptable level. As such, the cumulative effects on the Surface Water VC are predicted to be **Not Significant**.

TCL has developed mitigation measures that have been incorporated in the Project's design and/or operational procedures. These Project mitigation measures are outlined in **S1.0 Overview of Project Proponent Description** of the **EAC Application** and include Project design aspects such as site selection, selection of best available technologies to-date for Project infrastructure and mining equipment, and a commitment to progressive reclamation.

Moreover, as described in **S4.0-C3-5.3 Mitigation Measures**, TCL has developed management plans that will be used to manage environmental issues, including effects to surface water. The **Discharge Management Plan (S13.0-C5) (DMP)** and the **Metal Leaching (ML)/Acid Rock Drainage (ARD) Management Plan (S13.0-C12) (ML/ARDMP)** provides details pertaining to the operational plans for managing potentially acid generating (PAG) rock in management ponds and discharges to surface water for the Project. Additional follow-up strategies for dealing with selenium, including water treatment, are identified in **Appendix 13.5-I Selenium Management Plan** of the **DMP**. The plans contain information on expected discharge water quality limits, surface water discharge rates, discharge locations, emergency procedures for discharge system upsets, and contingency plans.

Along with the **DMP**, a comprehensive **Minesite Water Monitoring Program**, found in **Appendix 13.11-E** of the **Minesite Water Management Plan (S13.0-C5) (MWMP)**, will be used to gauge the performance of the Project's water management system and mitigation measures against model results and regulatory commitments during all Project phases.

Water quality monitoring will focus on identified parameters of POPCs from the Initial Dilution Zone (IDZ) mixing model (**Appendix 13.5-A IDZ Assessment Memo** of the **DMP**), which include dissolved and total aluminum, total antimony, total arsenic, dissolved cadmium, total chromium, total copper, total iron, total manganese, nitrate, nitrite, total selenium, total strontium, sulphate, total thallium, total uranium, and total zinc.

Monitoring of Parameters of POPC/COPC and POC/COC identified for aquatic life, wildlife, terrestrial vegetation, human health, and land uses will be conducted for soils, vegetation, sediment, and surface and groundwater. Monitoring of the specified POPC concentrations downstream of the Project discharge in Goathorn, Tenas, and Four creeks and in the Telkwa and Bulkley rivers, will assess that the creeks meet benchmarks. When changes are observed, solutions will be developed using adaptive management to determine the appropriate response.

Results of monitoring programs will be used to refine model predictions. The water and load balance model results will be used to evaluate if additional follow-up programs or interventions are required. Based on modelling results presented in **Appendix 1.0-E SRK, Tenas Project Water and Load Balance Modeling Report**, no follow-up programs are expected at this time.

1.4 Groundwater Valued Component (VC) (S4.0-C4)

The analyses of the Project's residual effects on groundwater quantity and quality were performed using a three-dimensional (3D) groundwater flow model. Based on the model results the potential change of groundwater levels in areas of private well users resulting from Project activities is considered **Not Significant** because the predicted Magnitude of level changes is Negligible; the change in groundwater discharge rates to creeks and rivers due to Project activities are considered **Not Significant** because the predicted changes are expected to be Low Magnitude; the changes to groundwater quality at private wells due to Project activities are considered **Not Significant** because the predicted changes are expected to be Low in Magnitude, and the change to the quality of groundwater discharging to creeks and rivers due to the Project activities are considered **Not Significant** because the effect Magnitude is predicted to be Negligible and Local in Extent.

The analyses are based on the site-specific and public data available about the Project, therefore the Level of Confidence on the model predictions is rated as Moderate. As no project or activity was identified as having a potential interaction with the predicted Project residual effects, the characterisation and Significance of the cumulative effects remain identical to those for the Project's residual effects.

TCL has developed management plans that will be used to manage environmental issues, including that in groundwater. The **DMP** and the **ML/ARDMP** provides details pertaining to the operational plans for managing PAG rock in management ponds and discharges to surface and groundwater at the Project. TCL has identified a follow-up strategy to evaluate the accuracy of effects predictions and effectiveness of proposed mitigation measures regarding groundwater. The strategy focuses on implementation of a water management plan and appended monitoring program, which involves implementation of widely recognized BMPs and the development of procedural mitigation measures to minimize anticipated effects. The **MWMP** provides these BMPs for the Project, and the proposed **Minesite Water Monitoring Program** outlined in **Appendix 13.11-E** of the **MWMP** will be implemented to monitor groundwater at the Project, evaluate the effectiveness of implemented mitigations, promote continuous improvement, and detect unanticipated effects where adaptive management protocols will be triggered.

Monitoring of POPC/COPC and POC/COC identified for aquatic life, wildlife, terrestrial vegetation, human health, and land uses will be conducted for soils, vegetation, sediment, and surface and groundwater.

The monitored parameters will include groundwater levels (automated and manual), and groundwater quality, including a focus on identified POPC. The results of the monitoring program will be reviewed on a frequency to be stipulated by future permit conditions; statistical analyses will be performed to evaluate the trends in monitoring indicators; and TCL will submit detailed reports as required by the operational permits. If original predictions of effects and mitigation effectiveness are not as expected, adaptive management principles and strategies will be implemented.

1.5 Aquatic Resources Valued Component (VC) (S4.0-C5)

Potential Project effects on the Aquatic Resources VC include:

- ▶ changes in water quality due to release of sediments, mine contact water, blast residues, and flow alterations;
- ▶ changes in sediment quality due to releases of sediments, mine contact water, blast residues, and flow alterations; and
- ▶ change in the abundance and community structure of periphyton and benthic invertebrates.

The Project will be developed to design-specifications to avoid, minimize, and offset potential effects on the Aquatic Resources VC during all Project phases. Project activities have been planned and sequenced to avoid watercourses and sensitive aquatic habitats to the extent practical, and the Project footprint has been minimized to the extent feasible. Mitigation measures based on industry BMPs, procedures and proven/accepted mitigation used on other similar projects have been designed and implemented to monitor and maintain the integrity of Aquatic Resources VCs during all Project phases. After mitigations, the only predicted residual effect are predicted changes in water quality. Project residual effects on Aquatic Resources are expected to be **Not Significant**. Considering this, the Project effects are not expected to alter the productivity and viability of the Aquatic Resources VC nor their ability to support healthy aquatic ecosystems within the RSA.

Project-related residual-effects were assessed in terms of their cumulative effect within the RSA based on available information and understanding of other reasonably foreseeable projects and activities. Upon review of projects and activities within the RSA (past, present, and reasonably foreseeable future), it was determined while there is potential for present and reasonably foreseeable future projects (specifically forestry activities), cumulative effects on Aquatic Resources are rated as **Not Significant**. The Level of Confidence for these predictions is High.

Adaptive management is a structured decision-making approach to reduce uncertainty over time via system monitoring. In the present context, the purpose of monitoring and adaptive management is to further quantify and qualify Project effects (if/where necessary), assess the effectiveness of mitigation measures, provide a mechanism for modification and/or adaptation, identify new problems (should they arise), and implement additional mitigation (if/where applicable), including triggers, corrective actions, and regulatory implications.

Comprehensive descriptions of management and monitoring for the Aquatic Resources VC are provided the following management plans developed for the Project: **Chemicals and Materials, Storage, Transfer, and Handling Plan (S13.0-C3) (CMSTHP)**, **Construction Environmental Management Plan (S13.0-C4) (CEMP)**, **DMP, Explosives Management Plan (S13.0-C6) (EMP)**, **Fuel Management and Spill Control Plan (S13.0-C7) (FMSPCP)**, **Mine Emergency Response Plan (S13.0-C9) (MERP)**, **MWMP, RCP, SEPSCP, Waste Management Plan for Refuse and Emissions (S13.0-C20) (WMPRE)**.

Contents of management plans relevant to this VC, including the BMPs, monitoring requirements and methods, will be updated with input from the British Columbia Ministry of Energy, Mines and Low Carbon Innovation (BC MEMLI), British Columbia Ministry of Environment and Climate Change Strategy (BC MECCS), British Columbia Ministry of Forests, Lands, Natural Resource Operations and Rural Development (BC MFLNRORD) and the Office of the Wet'suwet'en (OW).

Through these management plans, monitoring of POPC/COPC and POC/COC identified for aquatic life, wildlife, terrestrial vegetation, human health, and land uses will be conducted for soils, vegetation, sediment, and surface and groundwater will be conducted.

Where mitigation measures are not deemed to be successful, adaptive management techniques will be employed. Findings during monitoring, as well as revised BMPs, improved scientific methods, and regulatory changes will be incorporated into the management plans to reduce effects during the lifetime of the Project. For parameters that do not meet Canadian Council of Ministers of the Environment (CCME) guidelines, site-specific water quality objective (SSWQO) or a scientifically-based environmental benchmark (SBEB) will be used, per BC MECCS guidance.

1.6 Fish and Fish Habitat Valued Component (VC) (S4.0-C6)

Potential effects on the Fish and Fish Habitat VC and associated subcomponents include:

- ▶ a change in Fish Habitat: change in the aerial extent of available fish habitat due to the destruction or alteration of fish habitat, changes in baseflows, degradation of water quality, or creation of barriers to fish passage; and
- ▶ a change in Fish Health: change in the health, abundance, or the condition of fish due to direct impacts, stranding, or degradation of water quality.

The Project residual effects on the Fish and Fish Habitat VC are expected to be **Not Significant**. Considering this, the Project effects are not expected to alter the productivity and viability of the Fish and Fish Habitat VC within the Fish and Fish Habitat RSA. With implementation of fish habitat offsetting for harmful alteration, destruction, or disruption of fish habitats (HADDs), a net gain of fish habitat productivity is predicted. Project-related residual-effects were also assessed in terms of their cumulative effect within the RSA based on available information and understanding of other reasonably foreseeable projects and activities. Upon review of projects and activities within the RSA (past, present, and reasonably foreseeable future), and after determining that no additional mitigation measures are expected to be necessary, it was predicted that there is no potential for Project residual effects to interact cumulatively within the RSA. The Level of Confidence for these predictions is High.

The Project will be developed to design-specifications to avoid, minimize, and offset potential effects on the Fish and Fish Habitat VC and subcomponents during all Project phases. Project activities have been planned and sequenced to avoid watercourses and sensitive aquatic habitats to the extent practical, and the Project footprint has been minimized to the extent feasible. Mitigation measures based on industry BMP, procedures and proven/accepted mitigation used on other similar projects have been designed and implemented to monitor and maintain the integrity of Fish and Fish Habitat during Project phases.

Targeted monitoring and inspection within management plans such as the **DMP** and **MWMP**, respectively, will be implemented to verify the accuracy of residual effects and the efficacy of mitigation measures. Monitoring of POPC/COPC and POC/COC identified for aquatic life, wildlife, terrestrial vegetation, human health, and land uses will be conducted for soils, vegetation, sediment, and surface and groundwater.

Where mitigation measures are not deemed to be successful, adaptive management techniques will be employed. Findings during monitoring, as well as revised BMPs, improved scientific methods, and regulatory changes will be incorporated into the management plans to reduce effects during the lifetime of the Project. Key stakeholders, Indigenous groups, and government agencies will be involved in developing mitigation and adaptive management measures where applicable.

1.7 Vegetation Valued Component (VC) (S4.0-C7)

The alteration of vegetation is defined as reduced ecosystem function, plant vigour, and/or changes to population extent. The alteration of vegetation may occur due to introduction and/or proliferation of invasive plants, changes in water quality and quantity, edge effects, dust deposition, and soil erosion, deposition, and sedimentation.

Project residual effects on Old Growth Forest, Wetlands, Listed Ecological Communities, Culturally Important Species, and Rare Plants and Lichens are expected to be **Not Significant**. Considering this, the Project effects are not expected to alter the integrity of the Vegetation VC within the Vegetation RSA beyond

an acceptable level (i.e., it remains sustainable and is available to contribute to ecological function); and are expected to be **Not Significant**.

Future forestry activities are expected to have the greatest contribution to cumulative effects on the Vegetation VC; however, this is expected to be mitigated with the implementation of existing provincial and regional biodiversity and Old Growth Forest management objectives. As such, the cumulative effect on Vegetation VC is expected to be **Not Significant**.

Targeted monitoring and inspection will be undertaken during all phases to verify that mitigation measures to reduce effects to vegetation have been appropriately applied, maintained, adapted, and removed, where necessary. TCL will verify compliance and evaluate the success of mitigation measures, management plans, and applicable approval conditions.

Project monitoring and adaptive management plans specific to the Vegetation VC include: Vegetation and invasive plants will be routinely monitored in accordance with the **VMP**; soil monitoring during salvaging and stockpiling activities will be undertaken as described in the **Construction Environmental Management Plan (S13.0-C2) (CEMP)**; progressive reclamation and revegetation of disturbed areas will be monitored in accordance with the **RCP** and, metals monitoring will be employed to understand metals uptake in plants in accordance with the **VMP**. Monitoring of POPC/COPC and POC/COC identified for aquatic life, wildlife, terrestrial vegetation, human health, and land uses will be conducted for soils, vegetation, sediment, and surface and groundwater.

Where mitigation measures are not deemed to be successful, adaptive management techniques will be employed.

1.8 Wildlife Valued Component (VC) (S4.0-C8)

Habitat alteration and habitat loss are defined as indirect and direct changes to habitat (i.e., indirect includes habitat fragmentation, edge effects, and sensory disturbance) where suitable habitat for Wildlife is rendered less suitable or not suitable for Wildlife use.

The Project-related residual effects on Furbearers, Caribou, Grizzly Bear, Moose, Bats, and Western Toad were predicted to be **Not Significant**. Considering this, the Project effects are not expected to alter the population viability, persistence, or integrity of the Wildlife VC beyond an acceptable level (i.e., remains sustainable and is available to contribute to ecological function).

Project-related residual effects were assessed in terms of their cumulative effect within the Wildlife RSAs based on available information and understanding of other reasonably foreseeable projects and activities. Following a review of projects and activities (including past, present, and reasonably foreseeable) within the Wildlife RSAs it was determined that cumulative effects are expected to occur but are not expected to alter wildlife population viability or persistence of the Wildlife VC and are predicted to be **Not Significant**. The Level of Confidence for these predictions is Moderate. No additional mitigation is deemed necessary. Follow-up programs (i.e., to verify the accuracy of the Project-related residual effects and cumulative effects predictions) specific to the Wildlife VC are not warranted at this time.

Mitigation measures developed by TCL that have been incorporated in the Project's design and/or operational management plans, plus additional mitigation measures specific to Wildlife are based on proven and accepted mitigation used on other similar approved projects in British Columbia (BC) (e.g., Red Mountain Underground Gold, Blackwater Gold) that had similar potential adverse effects on Wildlife, as well as standard industry guidelines and BMPs. The mitigation measures implemented during all Project phases are expected to avoid and minimize the potential adverse effects of the Project on Wildlife. Monitoring of

POPC/COPC and POC/COC identified for aquatic life, wildlife, terrestrial vegetation, human health, and land uses will be conducted for soils, vegetation, sediment, and surface and groundwater.

Management plans, including the **Wildlife Management Plan (S13.0-C21) (WMP)**, will be considered living documents and updated when warranted to include input from consultations, monitoring results, regulatory or legislative changes, and any updated, improved, or revised BMPs and scientific methods. Project monitoring and adaptive management plans specific to Wildlife are that wildlife will be routinely monitored throughout the life of the Project in accordance with the **WMP**; and progressive reclamation and revegetation of disturbed areas (i.e., transitioning into wildlife habitat) will be monitored in accordance with the **RCP**.

1.9 Avian Valued Component (VC) (S4.0-C9)

The Avian VC section indicates that Project-related residual effects on Migratory Breeding Birds, Listed Bird Species, and Raptor subcomponents were predicted to be **Not Significant**. Considering this, the Project is not expected to result in a change to the Avian Species VC and is not expected to alter avian population viability or persistence within the Avian Species RSA beyond an acceptable level (i.e., the composition and population of the Avian Species VC are expected to remain sustainable and available to contribute to biodiversity and ecosystem function) and the Project-related residual effects on the Avian Species VC are predicted to be **Not Significant**. Cumulative effects on the Avian Species VC are predicted to be **Not Significant**. The Level of Confidence for these predictions is Moderate. No additional mitigation is deemed necessary.

Mitigation measures to address the potential adverse effects of the Project on Avian Species were developed by TCL that have been incorporated in the Project's design and/or operational procedures and additional mitigation measures specific to the Avian Species in TCL management plans, such as the **CEMP** and **WMP**. These mitigation measures are based on proven and accepted mitigation used on other similar approved projects in BC (e.g., Red Mountain Underground Gold, Blackwater Gold) that had similar potential adverse effects on avian species, as well as standard industry guidelines and BMPs. Monitoring of POPC/COPC and POC/COC identified for aquatic life, wildlife, terrestrial vegetation, human health, and land uses will be conducted for soils, vegetation, sediment, and surface and groundwater.

The mitigation measures implemented during all Project phases are expected to avoid, minimize, or limit the potential adverse effects of the Project on the Avian Species VC.

1.10 Labour Market Valued Component (VC) (S5.0-C1)

The Labour Market VC assessment identified three (3) potential adverse effects on Labour Market with respect to the Project. After the implementation of mitigation measures, residual effects were predicted for Labour Market that included:

- ▶ an increase in competition for skilled local and regional workforce;
- ▶ increase in labour cost; and
- ▶ barriers to Indigenous employment and participation in Project-related economic benefits.

After characterisation, all adverse residual effects of the Project were predicted to be **Not Significant**, and therefore, adverse residual effects of the Project on the Labour Market VC are predicted to be **Not Significant**. The adverse residual effects were carried forward for CEA. The CEA considered past, present, and reasonably foreseeable future projects and activities that could interact with the Project. The assessment determined that while there is potential for present and reasonably foreseeable future projects

and activities to cumulatively interact with the Project, there is uncertainty surrounding the number of potential future projects that will be realized, with additional uncertainty around scope and timing of those projects. While all three (3) cumulative effects are predicted, they are rated as **Not Significant**, and therefore, cumulative effects on the Labour Market VC are predicted to be **Not Significant**.

A **Socio-economic Management Plan (S13.0-C16) (SEMP)** was developed to reduce, manage, and mitigate Project-related economic and social effects, while strategically supporting community benefits and engagement. The **SEMP** will provide guidance regarding community engagement and communications for the purpose of sharing information and maximizing the potential for local and regional workforce to benefit from the Project, while demonstrating the Project's contribution to community development.

In the long-term, the **SEMP** will verify the accuracy of the residual effects and cumulative effects predictions, and the value of proposed mitigation measures; assess the efficacy of proposed mitigation measures and the need for modifications to those measures to allow effects predictions to remain valid; identify unexpected socio-economic issues or challenges, and as per the management plan, implement additional mitigation measures, if necessary.

1.11 Economic Development Valued Component (VC) (S5.0-C2)

The Economic Development VC and the Local Business and Industry subcomponent affects were assessed and after the implementation of identified mitigation measures, four (4) residual effects were predicted for Economic Development that included:

1. a decrease in economic diversity;
2. a change in the capacity of local or regional businesses to supply goods or services;
3. a decrease in local or regional tourism; and
4. a decrease in economic activity during the Decommissioning and Reclamation Phase.

After characterisation, all adverse residual effects of the Project were predicted to be **Not Significant**, and therefore, the residual effects of the Project on Economic Development were predicted to be **Not Significant**. The adverse residual effects were carried forward for CEA. The CEA considered past, present, and reasonably foreseeable future projects and activities that could interact with the Project. The assessment determined that while there is potential for present and reasonably foreseeable future projects and activities to cumulatively interact with the Project going forward, there is uncertainty surrounding the number of reasonably foreseeable future projects that could take place, with additional uncertainty around scope and timing of those projects. Thus, while all four (4) cumulative effects are predicted, they are rated as **Not Significant**, and therefore, the cumulative effects of the Project on Economic Development were predicted to be **Not Significant**.

Follow-up strategies were provided in the **SEMP** to reduce, manage, and mitigate Project-related economic and social effects, while strategically supporting community benefits and engagement.

1.12 Demographics Valued Component (VC) (S6.0-C1)

Considering the Project design elements and mitigations for the Demographics VC, the small size of the Project's workforce during all phases, and population projections for the region, the Project's effect on a change in population and related demographic factors are assessed as **Not Significant**. The contribution of the Project's residual effects to a cumulative effect of a change in population and related demographic factors is also assessed to be **Not Significant**, since the small population changes are predicted to be

consistent with and not to exceed current population projections for the RSA, as contributed to by projects in the Major Projects Inventory (MPI) and community resiliency is rated as High.

To mitigate the potential for adverse changes in population and related demographic factors during the Construction, and Operation phases, the Project has committed to develop and implement an employment strategy that aims to maximize employment of an existing resident workforce within the Local Study Area (LSA). This strategy intends to include provisions to encourage development of a diverse workforce, and on-the-job training programs aimed at bringing local residents into the workforce that otherwise may not have the required qualifications. During the Construction Phase, as a VC-specific mitigation the Project intends to utilize a modular design for Mine Infrastructure to reduce the required onsite workforce. This Project design optimization minimizes short-term temporary workforce fluctuations in population and avoids implementation of a workcamp or Fly-In-Fly-Out (FIFO) arrangements.

No specific monitoring or follow-up strategies are recommended; however, the Project will continue to engage with local residents to address a range of interests, issues and concerns related to changes in population.

Accordingly, follow-up strategies for other socio-economic VCs will contribute to monitoring of any demographics-related adverse effects. More information is also provided in the **SEMP**. The **SEMP** will provide guidance regarding community engagement and communications for the purpose of sharing information and maximizing the potential for local and regional workforce to benefit from the Project, while demonstrating the Project's contribution to community development. In the long-term, the **SEMP** will address the same items as in other Socio-economic sections.

1.13 Visual Resources Valued Component (VC) (S6.0-C2)

Visual Resources was assessed under one (1) subcomponent, Visual Quality. To assess the effects of the Project on the Visual Quality subcomponent, 19 viewpoints were identified from which the assessment would be carried out and each viewpoint was subject to a set of ratings called a Hassell Matrix, which rated specific variables regarding the sensitivity of the viewpoint to changes in Visual Quality, the visual condition of the landscape, and several geographic and visual characteristics of the design of the Project. The assessment determined that the effect on Visual Quality for the Minesite during the Active Phases would be **Significant**, the effect for the Minesite during the Post-closure Phase would be **Not Significant**, and the effect for the Rail Infrastructure during the Active Phases would be **Not Significant**. All residual effects were carried forward into the Visual Quality CEA. A comparison of two (2) scenarios resulted in a rating of **Not Significant**. In the Post-closure Phase, much of the visual disturbance would be removed or reclaimed, and only small, isolated disturbances would remain, resulting in a 0.4% increase in the total amount of visual disturbance in the RSA. This effect was also determined to be **Not Significant**. The concern of unintentional light effects will be managed using BMPs and engineering design.

With respect to follow-up strategies, as the Project is situated in a location valued for its scenic qualities and in proximity to a variety of land uses that place value on those views, the visual disturbance created by the Project will be monitored at the same viewpoints that were assessed in the effects assessment, to verify the predictions outlined in this assessment, assess the performance of the proposed mitigation strategies, and identify any unexpected visual disturbances. Mitigations are also proposed to reduce ambient light in the local area, and this will be assessed using remote sensing data over time. The monitoring program is described in the **Visual Resources Management Plan (S13.0-C21) (VRMP)**.

1.14 Infrastructure and Services Valued Component (VC) (S6.0-C3)

After the implementation of mitigation measures, three (3) residual effects were predicted for the Infrastructure and Services VC subcomponents:

1. Housing and Accommodation subcomponent: increase in cost or decreased availability of housing and accommodations during the Operation Phase;
2. Community Infrastructure and Services subcomponent: increased demand for child care services; and
3. Transportation subcomponent: change in use of roads and related increases in traffic during the Construction Phase and Decommissioning and Reclamation phases.

Upon characterisation and determination of Likelihood and Significance, the Project residual effects for the Infrastructure and Services VC subcomponents are **Not Significant**. The Level of Confidence for these predictions is Moderate to Low.

Project-related residual effects were assessed in terms of their cumulative effect within the RSA based on available information and understanding of other reasonably foreseeable projects and activities. Upon review of projects and activities within the RSA (past, present, and reasonably foreseeable future), and after determining that no additional mitigation measures are expected to be necessary, it was predicted cumulative effects are expected to occur but are **Not Significant** for an increase in cost or decrease in availability of housing and accommodations, increased demand for child care services and change in use of roads and related increases in traffic. The overall effect of the Project on Infrastructure and Services VC is **Not Significant**.

As discussed in **S6.0-C3-5.3 Mitigation Measures**, TCL will implement a Housing and Accommodation Program, an Employment, Education and Employment Program, and a Procurement Program focussed on obtaining goods and services from the local and regional businesses and will work with groups to ensure that barriers to entry for contracting opportunities are reduced for local and regional businesses (**SEMP**).

No specific monitoring or adaptive management programs are recommended; however, it can be reasonably anticipated that the Project, through the Community Engagement Programs in the **SEMP**, will continue to engage with local residents and Indigenous groups to address a range of interests, issues and concerns related to the Infrastructure and Services VC, including: availability of housing and accommodations; community infrastructure and services; and traffic and transportation.

To manage traffic effects, a Bypass Road will be built for coal transport to access the Rail Infrastructure for the duration of all Project phases to minimize traffic on existing, residential roads. A **Minesite Traffic Control Plan (S13.0-C10) (MTCP)** will be implemented, which describes the traffic management processes and procedures in place for the Project, including use of the Tenas Access Corridor (TAC) which provides access to the Minesite, and its associated haul and service roads within the Minesite.

1.15 Land and Resource Use Valued Component (VC) (S6.0-C4)

After the implementation of mitigation measures, three (3) potential residual effects were predicted for the Land and Resource Use VC: They are:

1. change in access;
2. change in sensory disturbance; and

3. change in quantity and quality of resources.

After characterisation, residual effects of the Project were predicted to be **Not Significant**; and the residual effects were carried forward for the CEA. The CEA considered past, present, and reasonably foreseeable future projects and activities that could interact with the Project. The assessment determined that while there is potential future projects and activities to cumulatively interact with the Project, there is uncertainty surrounding the number of future projects that will be realized, with additional uncertainty around scope and timing of those projects. While all three (3) cumulative effects are predicted, they are rated as **Not Significant**.

No specific monitoring or adaptive management programs were recommended; however, it is anticipated that the Project, through the Community Engagement Program (see **SEMP**), will continue to engage with local residents to address a range of interests, issues and concerns related to the Land and Resource Use VC, including:

- ▶ public health and safety restrictions on access and related issues;
- ▶ escorted access and maintenance of the Goathorn Creek Bridge;
- ▶ controlled crossing of the Bypass Road by local agricultural land users;
- ▶ maintenance of public roads and trails;
- ▶ monitoring of noise and emissions; and
- ▶ public participation in reclamation and closure planning.

1.16 Community Well-being Valued Component (VC) (S6.0-C5)

After the implementation of mitigation measures, four (4) residual effects were predicted for the Community Well-being VC, and they are:

1. a change in food security, in relation to a change in the quantity and quality of land and resources used during the harvesting of subsistence foods during the Construction, Operation, and Decommissioning and Reclamation phases;
2. a change in cost of living, associated with a change in cost or availability of housing and accommodations during the Construction, and Operation phases;
3. a change in community cohesion associated with local Project employment opportunities and higher wages likely to affect the social fabric of the community during the Construction, Operation, and Decommissioning and Reclamation phases; and
4. a change in mental health due to a change in levels of stress and anxiety among Project workers, their families and the communities during the Construction, Operation, and Decommissioning and Reclamation phases.

Upon characterisation and determination of Likelihood and Significance the Project residual effects on the Community Well-being VC are **Not Significant**. The Level of Confidence for these predictions is Moderate to Low.

The CEA considered past, present, and reasonably foreseeable future projects and activities that could interact with the Project. The assessment determined that while there is potential for present and reasonably foreseeable future projects and activities to cumulatively interact with the Project going forward, there is uncertainty surrounding the number of potential future projects that could take place, with additional

uncertainty around scope and timing of those projects. While cumulative effects on the Community Well-being VC are predicted, they are predicted to be **Not Significant**.

Follow-up strategies for the Community Well-being VC include a Subsistence Food Management Plan that will be developed as part of the **RCP**, and in consultation with the Wet'suwet'en and relevant authorities. The plan will address potential effects of the Project on the change in access to land and the availability of subsistence foods. Details of the plan and associated monitoring to assess the actual effects and effectiveness of mitigation measures will be developed prior to reclamation (i.e., prior to Year 22).

No additional specific monitoring or follow-up strategies are recommended; however the **SEMP** describes the initial components and contents of the Education, Training and Employment Program, Health and Wellness Program and Community Engagement Programs. A final **SEMP** will be developed in compliance with issued EAC Conditions and prior to the start of the Construction Phase. The **SEMP** will describe the predicted effects of the Project and corresponding mitigation measures, detail planned monitoring to assess the actual effects and effectiveness of the monitoring measures on the socio-economic environment, as well as to describe reporting requirements and schedule.

In addition, the **PAMP** will mitigate potential safety issues related to public access to the Project Area. A monitoring program will be developed to ensure that use of the Project Area by the public is compliant with both relevant legislation and the **PAMP**. Monitoring will include regular inspections of public access trails to ensure structures are in good shape. TCL will also conduct regular monitoring to ensure that the **PAMP** is being followed, and to gather input from users.

1.17 Heritage Resources Valued Component (VC) (S7.0-C1)

Through the Heritage Resources VC assessment, it was determined that there will be Negligible effects from the Project on both the Archaeological Resources, and Historic and Cultural Sites subcomponents, including palaeontological sites, of the Heritage Resources VC following the implementation of mitigation measures. There are no known Archaeological Resources with the LSA and known Historic and Cultural sites within the LSA include the early mine sites, three (3) post-1846 culturally modified tress (CMTs), the Hubert town site, and four (4) fossil sites.

Mitigation measures include the implementation of a Heritage Chance Find Procedure for the identification of as-yet unknown Heritage Resources that may exist within the LSA, avoidance through Project design and redesign, additional archaeological impact assessments (if required), and consultation with the local Indigenous and non-Indigenous communities prior to impacts to Heritage Resources. Therefore, it has been determined that there are no residual or cumulative effects for Heritage Resources.

With respect to Follow-up Strategies, even the most thorough assessment may not identify all Heritage Resources; therefore, a **Heritage Resources Management Plan (S13.0-C8) (HRMP)**, including Heritage and Palaeontological Chance Find Procedures will be used to identify and protect as-yet unknown Heritage Resources or fossils. Compliance with avoidance of Heritage and Palaeontological Resources will be monitored. If additional Heritage Resources are identified through future studies or additional Traditional Knowledge (TK) information, appropriate mitigations will be applied and if negative trends are identified, a root cause analysis will be conducted to identify gaps and areas for improvement. When these are identified, the Environmental Coordinator and the Consultant Archaeologist will develop and implement a suitable corrective action.

1.18 Human Health Valued Component (VC) (S8.0-C1)

In the Human Health VC, the following residual effects were identified and characterised:

- ▶ changes in Human Health due to Project-related changes in air quality from criteria air contaminants;
- ▶ changes in Human Health due to Project-related changes in metal concentrations in environmental media of non-carcinogenic metals (all exposure pathways) and carcinogenic metals (ingestion pathway only); and
- ▶ changes in Human Health due to Project-related increases in ambient noise levels

The Project's residual effects on the Human Health VC were predicted to be **Not Significant**. Considering this, the Project effects were not expected to alter the integrity of the Human Health VC within the local study area beyond an acceptable level.

All residual effects were carried forward into the CEA for reasonably foreseeable future projects in the area that may have overlapping effects on the Human Health VC. Cumulative effects on the Human Health VC identified in the CEA were the same as the Project residual effects. The Significance of the cumulative effects were determined to be **Not Significant**, consistent with the conclusions of the Significance characterisation for Project residual effects.

Monitoring and adaptive management measures were recommended to address uncertainties in the predictions and in the assessment. Environmental plans that include Human Health-related monitoring and adaptive management include:

- ▶ The **AQMP** will include the monitoring of PM₁₀ and PM_{2.5} and dustfall, as well as noise levels. The **AQMP** will include a Trigger Action Response Plan (TARP) for Air Quality and for Noise. If ambient CAC concentrations, or noise levels, more than 40% above the predicted concentrations from dispersion modelling are observed, an investigation will be conducted to determine the cause of the exceedance, revisit administrative and operational controls to resolve the exceedance, and update mitigation and monitoring measures as needed to confirm effect of changes and the need for additional mitigation;
- ▶ The **Minesite Water Monitoring Program (Appendix 13.11-E)** of the **MWMP** will include monitoring of water quality in surface water at existing receiving environment locations and in groundwater at existing and proposed monitoring wells. A TARP for water quality in discharging facilities prior to discharge will be developed and implemented so that end of pipe water quality limits or threshold discharge rates are not exceeded. Monitoring results will be compared against water and load balance model results to verify conceptual models developed for water quality;
- ▶ The **RCP** includes monitoring programs at Permanent Sample Plots (PSP) in background and reclaimed sites to discern any potential contaminant issues through monitoring of soil and plant-tissue chemistry. Plant species potentially consumed by humans and/or other animals will be tested for element concentrations;
- ▶ The **VMP** will include measuring trace metal concentrations in vegetation and soil over time. Metals monitoring in vegetation will identify if plants are being affected by the Project and accumulating metals in their tissue (BC MEMLI 2021). Monitoring will be used to guide Project dust management and reclamation and will include measuring trace metal concentrations in vegetation and soil over time. Trace metals uptake will be monitored periodically (e.g., one [1] to five [5] years) during the Construction, and Operation phases; and

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- ▶ In the management plans above, monitoring of POPC/COPC and POC/COC identified for aquatic life, wildlife, terrestrial vegetation, human health, and land uses will be conducted for soils, vegetation, sediment, and surface and groundwater.

Any monitoring not included in the above plans that is recommended for Human Health (e.g., monitoring of COPC concentrations in fish tissue) is expected to be included under a Human Health Monitoring Program (HHMP) that may be required by EAC conditions, as this has been a requirement of recently granted EACs for mining projects in BC.

2. REPORTING STRUCTURE

The reporting structure in TCLs management plans is governed by the organizational structure presented in the **Environmental Management System (S13.0-C1) (EMS)**, which is 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. See **Figure 2-1 Tenas Project Organizational Structure**.

Positions specific to each management plan are found in **9. Roles and Responsibilities** of each plan **S13.0-C2** through **S13.0-C21**, the monitoring programs presented in each plan. Roles, responsibilities, and reporting structure will be updated as required to address *MA/EMA* permit and EAC conditions when such information is available.

Primary roles at the Project will include:

- ▶ **Mine Manager** bears overall responsibility for all phases of the Project, and responsibility for onsite environmental monitoring and compliance. 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;
- ▶ **Mine Superintendent** reports to the Mine Manager and is responsible to provide adequate resources to implement and adhere to all management plans and monitoring programs. The Mine Superintendent also supports the Environment Department, including the Environmental Coordinator, and QPs;
- ▶ **Health, Safety, and Human Resources Superintendent** reports directly to the Mine Manager. During all Project phases, the Health, Safety, and Human Resources Superintendent will oversee the Health and Safety-related management plans and programs and assist the Environmental Coordinator with corrective actions as needed;
- ▶ **Environmental Coordinator** reports to the Mine Superintendent and is responsible for following the management plans, including their specific performance objectives, monitors compliance with TCL's environmental programs and permits, and will ensure adherence to these by all Project staff and contractors. The Environmental Coordinator supervises the Environment Department's environmental monitoring programs, inspection systems, and reporting to government agencies and Indigenous groups;
- ▶ **Environmental Technician** reports to the Environmental Coordinator and conducts the environmental monitoring and inspection programs, monitoring data compilation, data quality assurance/control, assists with monitoring compliance with TCL permits, and assists the Environmental Coordinator with reporting to government agencies and Indigenous groups;
- ▶ **Quality Assurance/Quality Control (QA/QC) Technician** reports to the Environmental Coordinator and assists with all water, sediment, surface soil, overburden, dust samples and ML/ARD samples of mine rock, processed rock, run-of-mine (ROM) coal and open pit surfaces, using standard industry BMPs and QA/QC methodologies, completes inspections of water management infrastructure, and assists the Environmental Coordinator with reporting to government agencies and Indigenous groups;
- ▶ **Qualified Professionals (QPs)** will be retained as necessary to assist in supporting TCL's activities to follow any management plans that require these professionals;
- ▶ **Independent Environmental Monitor (IEM)** will be retained by TCL as necessary. This is a likely requirement of the EAC conditions. The IEM reports independently to BC EAO and provides

information or reporting to agencies or Indigenous groups as directed by BC EAO. The IEM will have direct communication with the BC EAO and TCL's Environmental Coordinator, Environmental Technician, Mine Superintendent, Mine Manager, and Contractors to facilitate site inspection access, data requests, reporting and compliance communications during the Construction Phase. BC EAO will outline the circumstances in which the IEM will have the authority to stop work on the Project or a portion of the Project to the extent that the IEM determines is necessary to prevent or reduce adverse effects caused by a non-compliance with the EAC conditions; and

- ▶ **Employees and Contractors** will complete a site-specific induction and training appropriate to their role, understand and implement the management plans as appropriate to their role, comply with permit and EAC Conditions and all other regulatory requirements, and report all environmental and safety incidents to their supervisor.

Additional positions in the TCL organization are shown below in **Figure 2-1**. All personnel in the organizational structure are required to complete training in the **EMS**, and the management plans as appropriate to their roles and responsibilities. The collaboration of all employees with the primary personnel identified above will assist to successfully implement follow-up strategies identified in VC sections **S4.0** through **S8.0**, and the management plans in **S13.0**.

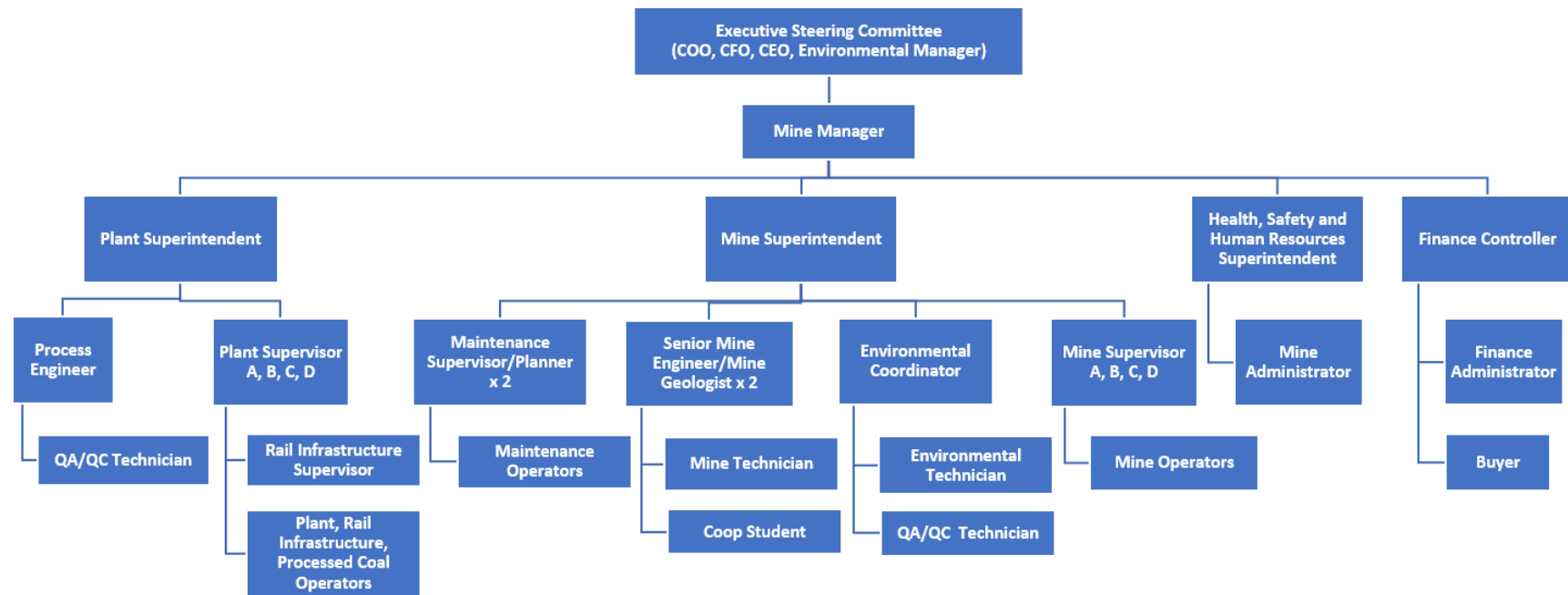


Figure 2-1: Tenas Project Organizational Structure

3. REFERENCES

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