

Appendix 12.0-A Tenas Project Public Consultation Plan



Tenas Project

Public Consultation Plan

September 12, 2019

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List of Acronyms	
Acid rock drainage	ARD
Allegiance Coal Limited	ACL
Application Information Requirements	AIR
Australian securities exchange	ASX
British Columbia	BC
British Columbia <i>Environmental Assessment Act</i>	BCEAA
British Columbia Environmental Assessment Office	EAO
Bulkley Valley Bowmen	BVB
Bulkley Valley Community Resources Board	CRB
Bulkley Valley Research and Monitoring Centre	BVRC
Canadian Environmental Assessment Agency	CEA
Environment & Climate Change Canada	ECCC
Environmental Assessment	EA
Environmental Assessment Application	EAA
Environmental Assessment Certificate	EAC
Environmental Assessment Report	AR
<i>Environmental Management Act</i> Permit Application	EMA PA
Industrial Use Permit	IUP
Major Mines Permitting Office	MMPO
Member of the Legislative Assembly	MLA
Member of Parliament	MP
Ministry of Energy, Mines, and Petroleum Resources	EMPR
Ministry of Environment and Climate Strategy	ENV
Ministry of Energy, Mines & Petroleum Resources	EMPR
Ministry of Forests, Lands, Natural Resource Operations and Rural Development	FLNRORD
Northwest BC Resource Benefits Alliance	NBA
Regional District of Bulkley-Nechako	RDBN
Skeena Watershed Conservation Coalition	SW
Telkwa Coal Limited	TCL
Tenas Project	The Project

1. INTRODUCTION

1.1 Project Overview

Telkwa Coal Limited (TCL) is proposing to develop the Tenas Project (the Project), a surface coal mine designed to produce approximately 15.0 million tonnes of washed metallurgical coal product, at about 775,000 to 825,000 saleable tonnes per year, to be used in the manufacture of steel. The mine life of the Project will be around 25 years, including the construction, operation and reclamation phases.

TCL's proposed Project is about 25 kilometres south of Smithers and 7 kilometres southwest of the village of Telkwa in northwestern British Columbia (BC) (**Figure 1**) (**Figure 2**). The Project is located on provincial Crown Land, three freehold land parcels owned by TCL, and nine coal licences held by TCL and Bulkley Valley Coal Ltd. (who have agreed to allow TCL to access their licenses for mine infrastructure and the recovery of coal).

Under Part 3, Section 8 of the Reviewable Projects Regulation for the *BC Environmental Assessment Act* (2002) (BCEAA), the proposed Project will trigger an environmental assessment (EA), as its approximate production is above the 250,000 tonnes per year threshold. However, the Project's average daily production rate of 2,200 tonnes per day is below the threshold for a new coal mine under the *Canadian Environmental Assessment Act*, 2012, which is 3,000 tonnes per day. The Canadian Environmental (CEA) Agency has determined that the Project does not trigger a federal EA review.

TCL is applying for concurrent review of permits under the *BC Mines Act* and *Environmental Management Act* pursuant to the *BC Environmental Assessment Act* Concurrent Approvals Regulation (BC Reg. 371/2002). Under this Regulation, permits will be reviewed at the same time as TCL's Application for an EA Certificate. No decisions on permits can be made until an EA Certificate is issued by the Minister of Energy, Mines and Petroleum Resources and the Minister of Environment and Climate Change Strategy.

1.2 Proponent Information

TCL is a subsidiary of Australian-based Allegiance Coal Limited (ACL), a publicly-listed company on the Australian securities exchange (ASX: AHQ) with headquarters in Sydney, Australia. In addition to the Project, ACL owns two other projects located in central Queensland, Australia: the Kilmain and Back Creek projects. The Tenas Project is the company's flagship project. ACL does not own or operate any other projects in BC. TCL has offices in Telkwa and Vancouver, BC. The company was registered in BC on September 10, 2014 (BC1013154). The TCL website is: <http://www.allegiancecoal.com.au>.

The environmental assessment and permitting contact for the Project is:

Angela Waterman, Director for Environment & Government Relations

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Figure 1 Project Layout

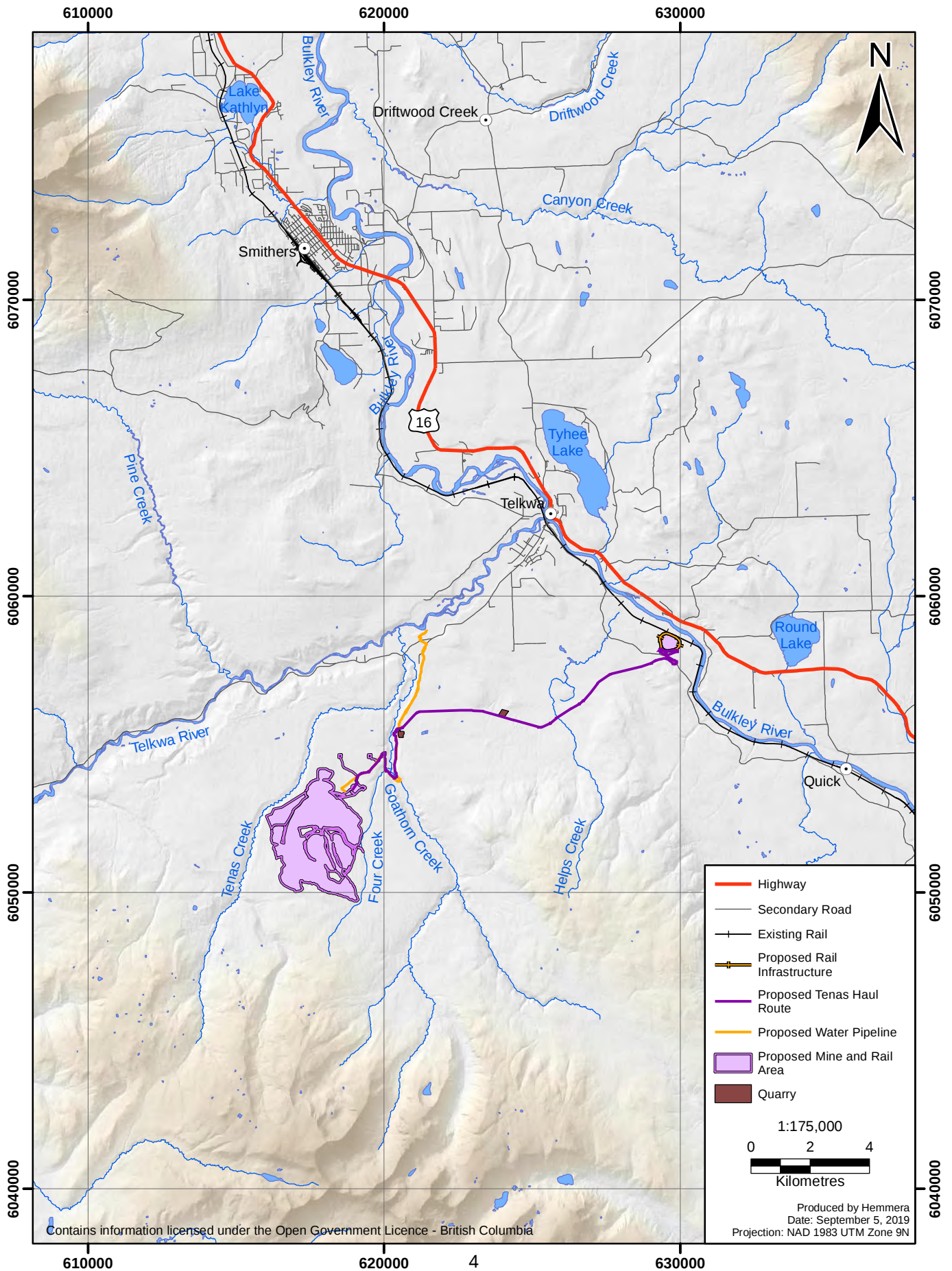
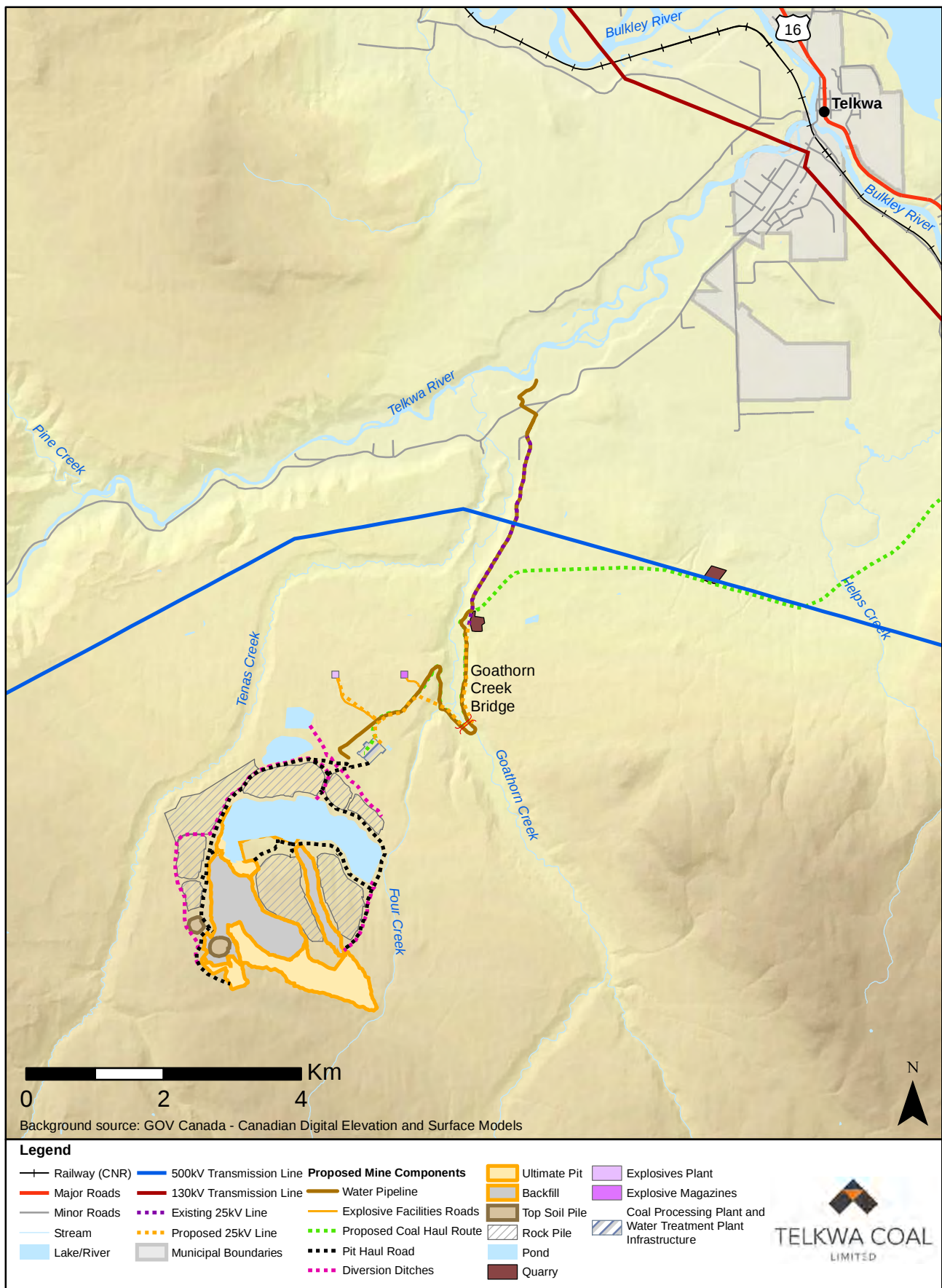


Figure 2 Project Components



2. PURPOSE

2.1 Purpose of Public Consultation

TCL's primary objective is to effectively communicate information about the proposed Project and involve those who may be affected by or have an interest in the Project. In this spirit, TCL is committed to addressing issues and concerns of the local community and stakeholders. TCL is committed to creating and maintaining opportunities for constructive dialogue and relationships with local and regional stakeholders to develop the Project responsibly. As part of the Project's consultation, TCL is focused on engaging with the community throughout the Project, including Project development, to ensure feedback from the public is considered when planning the Project.

The Public Consultation Plan is designed to achieve the following:

- 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 EA process using tracking tables and other documentation methods
- Foster strong, collaborative and long-term partnerships with regulators, community groups, and other stakeholders
- Gather input and feedback on the Project from the local community and stakeholders and ensure it is considered during Project planning

2.2 Purpose of Public Consultation Plan

The Public Consultation Plan developed for the Project is designed to meet the requirements outlined in the Province of BC Public Consultation Policy Regulation (BC Reg. 373/2002) and the consultation provisions described in the BC Environmental Assessment Office (EAO) environmental assessment review procedures ordered under Section 11 of the *BC Environmental Assessment Act*.

The Public Consultation Plan is a living document that will be updated over time as key Project milestones are achieved. As per Section 16 of the Section 11 order, the Public Consultation Plan will inform the Public Consultation Report, which will be submitted 60 days after the Public Comment Period ends.

The intent of the Public Consultation Plan is to capture past and future engagement activities between TCL and the local community and stakeholders. As per the Section 11 order, TCL will also create an Indigenous Consultation Plan to describe past and future engagement activities. For clarification, TCL will report on engagement activities with Indigenous groups separately, however, there is potential overlap between community and Indigenous engagement (i.e., there may be Indigenous attendance at open houses and other community and industry events TCL hosts or participates in).

3. PUBLIC CONSULTATION

3.1 Public Consultation Area

The Project is located about 25 kilometres south of Smithers and 7 kilometres southwest of the village of Telkwa in northwestern BC. The Project is located on provincial Crown Land, four private parcels, three freehold land parcels owned by TCL, and nine coal licences held by TCL and Bulkley Valley Collieries Ltd. (who have agreed to allow TCL to access their licenses for mine infrastructure). The Project's rail infrastructure will be located on private land owned by TCL subject to Project approval.

The proposed consultation area includes local municipalities and the regional district (e.g., Village of Telkwa, Town of Smithers, and Regional District of Bulkley Nechako Electoral Area A), and residents and community interest groups of the Bulkley Valley.

3.2 Identifying Interested Parties

Since February 2017, TCL has engaged with community members and interested parties that are interested or potentially affected by the Project, either directly or indirectly (**Table 1**). These interested parties were identified based on the following criteria:

- Input from local Project consultants, local and regional government officials, community interest groups, and individual residents of the Bulkley Nechako.
- Interested parties previously consulted on similar Projects in the area
- Information gathered from local meetings, open houses, and information sessions.

TCL's public interested parties list includes individuals or groups that are potentially affected by the Project and/or have an interest in the Project: local and regional government; residents (e.g., residents of local communities); recreation groups (e.g., hikers, campers, hunters, and fishing guides); community interest groups; and those with commercial interests (e.g., forestry, trappers, and outfitters). **Table 2** outlines key Project interests from interested parties that have been engaged with during early engagement and pre-application stages.

The public interested parties list is not intended to be an exhaustive record of all potential interested parties but is intended to provide an initial understanding of the groups that are in close proximity to the proposed Project, may have an interest in the Project and may have been previously consulted on similar projects in the area.

As the Project progresses, additional interested parties may be identified. In addition, TCL will ensure that the general public is aware of the Project through regular consultation activities and opportunities for feedback (e.g., social media and advertisements in local newspapers). **Section 4** provides information on consultation activities and how the local community and interested parties will be engaged over the course of the Project.

Table 1 Interested Parties

Interested Parties
Regional and Provincial Government
BC Environmental Assessment Office
BC Ministry of Agriculture
BC Ministry of Energy, Mines and Petroleum Resources
BC Ministry of Environment
BC Ministry of Forests, Lands, Natural Resource Operations and Rural Development
BC Ministries of Jobs, Trade and Technology
BC Ministry of Municipal Affairs and Housing
BC Ministry of Transportation and Infrastructure
BC Agriculture Land Commission
Northern Health
Provincial Member of Legislative Assembly for Stikine
Federal Government
Canadian Environmental Assessment Agency
Environment and Climate Change Canada
Federal Member of Parliament for Skeena-Bulkley
Natural Resources Canada
Transport Canada
Local Governments
Village of Telkwa
Town of Smithers
Regional District of Bulkley-Nechako
District of Houston
Other Government Entities
BC Hydro
Northwest BC Resource Benefits Alliance
Work BC
Local and Regional Community
Tenas Mine Neighbours Group
Bulkley Valley Residents (includes residents of the Village of Telkwa, Town of Smithers, and Regional District of Bulkley Nechako Electoral Area A).
Recreation Groups
Bulkley Valley Backpackers
Bulkley Valley Bowmen
Back Country Horsemen of BC – Northwest Chapter
Bulkley Valley Quad Riders
Bulkley Valley Rod and Gun Club
Smithers Snowmobile Club
Fishing guides (commercial)
Guide outfitters (commercial)
Local Trapline Holders (commercial)
Community Interest Groups
Bulkley Valley Community Resources Board
Bulkley Valley Lakes District Airshed Management Society
Bulkley Valley Museum
Bulkley Valley Research Centre
Education Providers (Coast Mountain College, Bulkley Valley Learning Centre, School District 54 Bulkley Valley, Smithers Secondary School, Telkwa Elementary School, Muheim Elementary School)
Local Businesses
Skeena Watershed Conservation Coalition
Smithers Chamber of Commerce

Smithers Exploration Group
Telkwa Museum
What Matters in our Valley
Industry
Canadian National Railway
West Fraser Timber Company (Pacific Inland Resources)
Pacific Northern Gas Ltd
Ridley Terminals Inc.

Table 2 Key Project Interests from Interested Parties

Type of Audience	Interested Parties	Interest in the proposed Project
<i>Local and Regional Government</i>	Village of Telkwa	Potential water, dust, noise, traffic and economic impacts.
	Town of Smithers	Potential water, noise, traffic, fish and economic impacts.
	Regional District of Bulkley-Nechako	Potential water, noise, and traffic impacts.
	MLA Doug Donaldson	Suggested TCL go through EAO instead of just Major Mines Permitting Office (MMPO).
<i>Local Community</i>	Tenas Mine Neighbours	Potential water, dust, noise, traffic, economic, wildlife, acid rock drainage (ARD), visual and recreation impacts.
	Bulkley Valley Residents	Potential water, dust, noise, traffic, economic, wildlife, ARD, visual and recreation impacts.
<i>Local Recreation Groups</i>	Back Country Horsemen	Potential wildlife and recreational impacts.
	Bulkley Valley Bowmen	Potential recreational impacts.
	Smithers Snowmobile Association	Potential recreational impacts.
	Fishing Guides	Potential commercial recreation impacts.
	Guide Outfitters	Potential commercial recreation impacts.
<i>Local Community Groups</i>	Bulkley Valley Community Resource Board	Potential water, dust, noise, traffic, economic, wildlife, ARD, visual and recreational impacts.
	Skeena Watershed Conservation Coalition	Potential water and fish impacts.
	Smithers Chamber of Commerce	Potential economic impacts.
	Smithers Exploration Group	Potential water, noise and visual impacts.
	Trout Creek Fish Hatchery	Potential water and fish impacts.
<i>Local Business</i>	Local Business	Potential water, fish and economic impacts.
<i>Education</i>	Education	Potential economic and educational impacts.

4. PHASES OF CONSULTATION

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. Consultation will occur over four phases: Early Engagement; Pre-Application; Application Review; and Ongoing engagement during operations, reclamation and closure. The phases are described in the Sections below.

4.1 Early Engagement Phase

Early and initial engagement included activities undertaken up to the issuance of a Section 10 Order of the *BC Environmental Assessment Act* on November 6, 2018. A Section 10 order is a legally binding order that is issued once a project is deemed “reviewable”, and therefore requires the project to undergo an environmental assessment.

Project engagement with the local community and interested parties was initiated in early 2017. Since 2017 and up to the issuance of the Section 10 Order, early engagement has included in-person meetings, site visits, phone-calls, and emails with interested parties listed in **Table 1**. This includes Local, Regional, Provincial, and Federal Governments, local and regional community members, recreation groups, and community interest groups.

The primary activities that occurred in the Early Engagement phase are:

- Early General Engagement Activities
- Early Engagement Meetings
- Open House
- Tenas Mine Neighbours Group
- Information Program

As the Project progresses, TCL will continue to employ engagement strategies that promote effective communication and relationship-building. The following sections describe the early engagement efforts on behalf of the Project thus far.

4.1.1 Early General Engagement Activities

TCL undertook several general engagement activities during the early engagement phase to communicate with the local community and interested parties and allow for open dialogue during this phase of the Project. The general engagement activities are in addition to the open house, neighbours meeting, and Information Program that occurred during the early engagement phase. General engagement activities include:

- **Open-Door Policy** – TCL has an open-door policy at our local Telkwa office. Community members are encouraged to stop by the office to speak with team members (including the CEO), as well as view open house poster boards that are on display and other information materials.
- **General engagement Meetings and Presentations** – TCL is committed to continuous engagement with interested parties via in-person meetings, telephone calls, and emails to share Project information and ask Project-related questions. Much of this early engagement is detailed in **Section 4.1.2** of this Plan.
- **Company Website** – Project updates and communication materials relevant to engagement have been posted on the company website.
- **Social Media** – TCL posts weekly to our Facebook and Twitter accounts. Content includes project information and updates, community events, communication and information materials.
- **Site Tours** – TCL held site tours during the early engagement phase for interested parties.

- **Participation at Community and Industry Events** – TCL participated in several local community and industry events, including the Telkwa BBQ and the Bulkley Valley Exhibition in September 2018, and Minerals North in Houston in April 2018.

4.1.2 Early Engagement Meetings

The sections below detail engagement activities between TCL and four major groups of interested parties, starting in 2017 to November 6, 2018 when the Section 10 order was issued by the BC EAO. The sections below are not intended to be an exhaustive record of TCL's comprehensive early engagement activities, but a capture of high-level discussion points.

4.1.2.1 Local and Regional Government

TCL met with the following local and regional governments to provide information on the Project during the early engagement phase:

- ▶ Village of Telkwa;
- ▶ Town of Smithers;
- ▶ Regional District of Bulkley-Nechako (RDBN);
- ▶ Member of the Legislative Assembly (MLA) Doug Donaldson – Stikine

TCL has engaged with the Village of Telkwa since the Spring 2017, the Town of Smithers since the Spring 2018, the RDBN since the Fall 2017, and MLA Donaldson since the Spring 2018. As detailed in **Table 3**, TCL met with these groups 14 times collectively throughout the early engagement phase. Outside of these meetings, TCL had the following number of interactions via email, phone, or letters with the Village of Telkwa (48), the Town of Smithers (13), the RDBN (46), and MLA Donaldson's office (5). Representatives from the Village of Telkwa, Town of Smithers, and Regional District of Bulkley Nechako Electoral Area A are also a part of the EAO-led Advisory Working Group for the Project, where they represent the interests of their constituents.

Attendance of specific personnel in meetings varied. The Village of Telkwa was represented by one or more of mayor, deputy mayor, chief administrative officer, and councillor(s). The Town of Smithers was represented by the mayor and/or councillors, the RDBN was represented by either the Area A Director (Smithers / Telkwa Rural), the Director of Planning, and/or the RDBN Planner, and MLA Donaldson represented himself.

Table 3 outlines a list of meetings between TCL and local government during the early engagement phase and includes discussion topics.

Table 3 Local and Regional Government Meetings

Meeting Date	No.	Discussion Topics
<i>Village of Telkwa</i>		
2017	5	• Project overview
April 11		• Proposed rail infrastructure
September 27-29		• Tenas Bypass Road (alternative haul route to Telkwa Coalmine Road)
November 8		• Logging road (routes, number of trucks)
		• Utilizing local community businesses
		• Upcoming community open house structure

Meeting Date	No.	Discussion Topics
<i>Village of Telkwa</i>		
2018 June 18, 21	2	• Coal license application (onsite infrastructure) • The need for early community consultation (wider community engagement) • Community open house debrief • Selenium baseline studies • Ongoing dust and noise data collection • Water (quality, use) • Project overview • TCL to participate in EA process
Total	7	
<i>Town of Smithers</i>		
2018 May 22 June 11	2	• Project overview • Formal Presentation with Mayor and council and reviewing meeting details • Tenas Bypass Road (alternative haul route to Telkwa Coalmine Road, truck traffic) • Blasting frequency • Salmon populations • Explanation of regulatory process • Community engagement • Water (use, quality) • Employment opportunities • Coal market (overview, product quality) • Caribou concerns
Total	2	
<i>Regional District of Bulkley-Nechako</i>		
2017 September 28 December 7	2	• Project overview • Rail infrastructure • Tenas Bypass Road (alternative haul route to Telkwa Coalmine Road) • Logging road (routes, number of trucks) • Indigenous consultation
2018 February 1 June 11	2	• Industrial Use Permit (IUP) application (rail infrastructure) • Coal license application (geotechnical work along mine infrastructure alignment) • Importance of community consultation • Scope of project.
Total	4	
<i>MLA Doug Donaldson – Stikine</i>		
2018 May 1	1	• Project overview • Tenas Bypass Road (alternative hauling route to Telkwa Coalmine Road) • Community engagement • EA process
Total	1	

Outside of local and regional governments, TCL engaged with two government entities, Northwest BC Resource Benefits Alliance (RBA) and Work BC, and Member of Parliament (MP) for Skeena-Bulkley Valley, Nathan Cullen. TCL engaged with RBA via email, phone and letters 15 times in the early engagement phase to present a Project overview and for RBA to provide an organizational overview. TCL wrote a letter in support of RBA's efforts with the province to obtain a greater share of provincial revenue. TCL emailed Work BC once on May 28, 2018 regarding future employment opportunities. TCL emailed and phoned MP Cullen three times to coordinate a meeting.

4.1.2.2 Local Community Meetings

TCL has organized the local community into two groups: the Tenas Mine Neighbours, and Bulkley Valley Residents. The Tenas Mine Neighbours consist of the fifteen families with property and/or tenure in closest proximity to the Project. TCL felt it was important to create a neighbours' group to provide a dedicated forum for those with property and/or tenure in closest proximity to the Project, to receive Project information and ask questions, beyond the community open houses. Bulkley Valley Residents include those living in Village of Telkwa, Town of Smithers, and RDBN Electoral Area A (**Figure 3**).

TCL initiated engagement with the local community in Fall 2017. Conversations have taken multiple forms, including informal discussions and meetings, phone calls, letters and emails. In addition to this engagement, TCL also hosted a community open house and a Tenas Mine Neighbours meeting within the early engagement phase. These will be as discussed in **Section 4.1.3** and **Section 4.1.4**.

Within the Early Engagement phase, TCL met with the local community collectively 54 times, not including the neighbours meeting and community open house. Outside of these informal meetings, TCL has had the following number of interactions via email, phone, or letters with the Tenas Mine Neighbours (95), and Bulkley Valley residents (62).

Table 4 provides a list of meetings between TCL and the local community in the Early Engagement phase and includes discussion topics.

Figure 3 Project Location and Municipal Boundaries

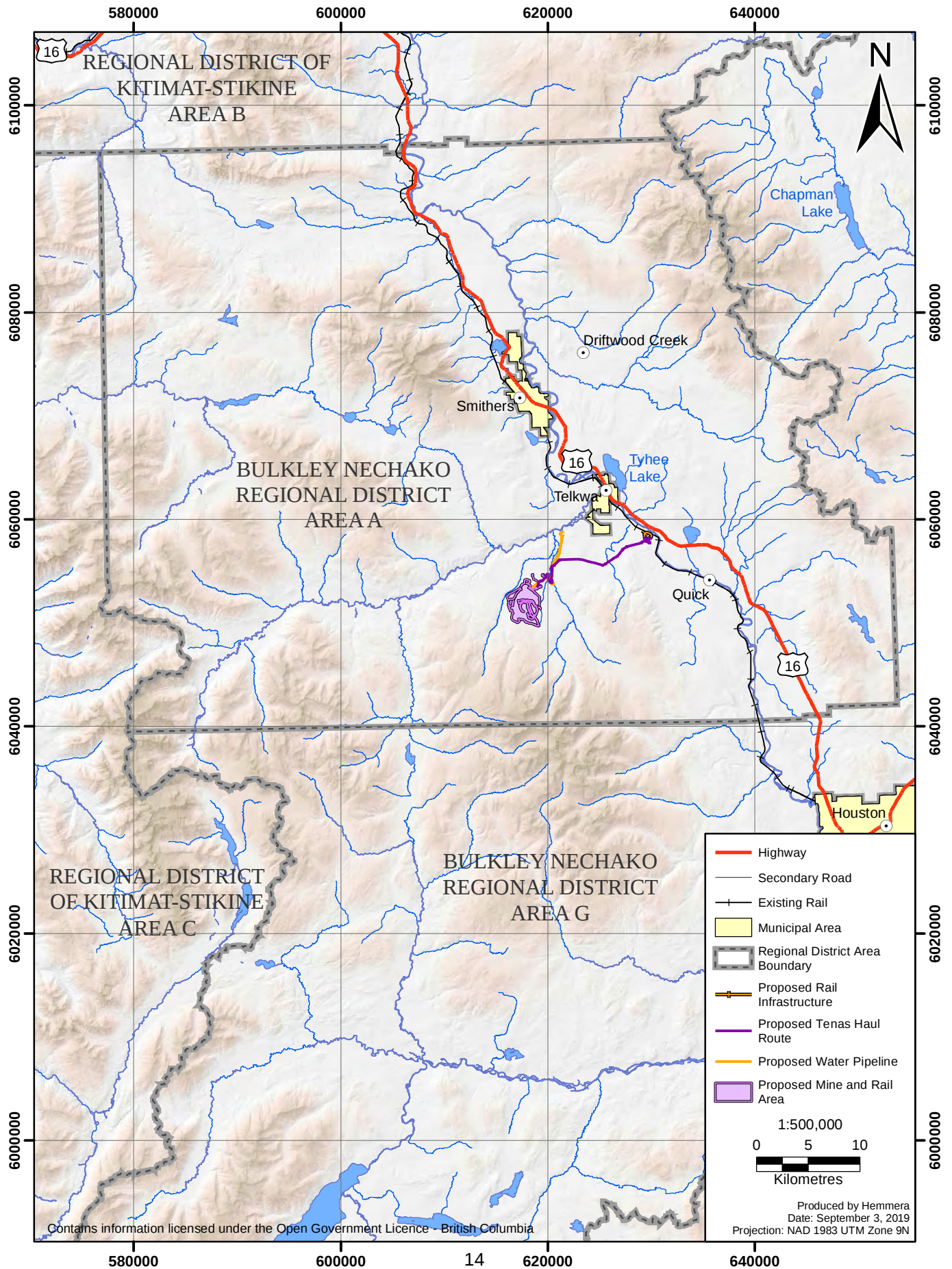


Table 4 Local Community Meetings

Meeting Date	No.	Discussion Topics
<i>Tenas Mine Neighbours</i>		
2017 November 8	1	• Creation of Neighbours group • Project overview • Tenas Bypass Road (increase in traffic, employee use of road, dust, noise) • Potential road use agreement • Recreation (continued access)
2018 February 6 March 13 April 1 July 25 August 8 September 10, 19, 20, 28 October 9-12, 19, 29-30	34	• Potential changes to quality of life • Tenas Bypass Road (location, access, increase in traffic, noise and dust due to hauling trucks, land tenure) • General project updates • Partisol station (installation) • Rail infrastructure (location, updates) • Grazing of cattle (licenses, leases) • Water (quality, available data, use) • Employment opportunities • Tenas Mine Neighbours group meeting • Exploration program (notification of upcoming drilling program) • Recreation (continued access)
Total	35	
<i>Bulkley Valley Residents</i>		
2018 May 9, 10, 14, 22, 24-25 June 4, 7, 11-12, 15, 18, 26 August 17 October 18	19	• Project overview and updates • Water (use, quality) • Regulatory process explanation • Visual quality (impacts) • Upcoming community open house • Future meetings (planning) • Exploration program (property use) • Rail infrastructure (location)
Total	19	

4.1.2.3 Local Recreation Groups

TCL has met with the following local commercial and non-commercial recreation groups to provide information on the Project during the Early Engagement phase:

- ▶ Back Country Horsemen;
- ▶ Bulkley Valley Bowmen
- ▶ Smithers Snowmobile Association
- ▶ Fishing Guides (commercial)
- ▶ Guide Outfitters (commercial)

TCL began engaging with local recreation groups in Spring 2017 and continued throughout the early engagement phase. As detailed in **Table 5**, TCL met with these groups 11 times collectively throughout the early engagement phase. Outside of these meetings, TCL has had the following number of interactions via

email, phone, or letters with the Back Country Horsemen (11), fishing guides (8), and the Smithers Snowmobile Association (1). On May 23, 2018 TCL and the Back Country Horsemen signed a Communication and Engagement Agreement that detailed the communication and engagement methods of their partnership.

Table 5 provides a list of meetings between TCL and the local recreation groups during the early engagement phase and includes discussion topics.

Table 5 Local Recreation Group Engagements

Meeting Date	No.	Discussion Topics
<i>Back Country Horsemen</i>		
2017 September 27	1	Project location and overview, BCH described organizational structure and mission, recreation sites and trails.
2018 March 12 April 27 September 27 November 6	4	Enhancing Project minesite, partnership agreement, site use agreement, Project trails.
Total	5	
<i>Bulkley Valley Bowmen</i>		
2018 October 9	1	Bulkley Valley Bowmen's (BVB) use of their property, BVB described organizational structure and mission.
<i>Fishing Guides</i>		
2018 July 24 September 27	3	Project overview, plans for future communication and potential fishing tour, community engagement strategy.
<i>Guide Outfitters</i>		
2018 September 27	1	Project overview, hunting and grazing rights, site access.
<i>Smithers Snowmobile Association</i>		
2018 October 25	1	Map of project and existing public trails, recreation use in Telkwa area.
Total	11	

TCL has also engaged with several recreation groups via email, phone, or letters, including local trapline holders, the Bulkley Valley Quad Riders, and the Bulkley Valley Rod and Gun Club. On June 21, 2018, TCL had a phone call with a local trapline holder to discuss historical trapping in the areas, as well as a Project overview. Further engagement with local trapline holders will be discussed in **Section 4.2.4.1**. TCL had a phone call on October 4, 2018 with the Bulkley Valley Quad Riders to discuss the Regional Access Management Plan and limited motorized access areas. TCL also had a phone call with Bulkley Valley Rod and Gun Club on October 4, 2018 to schedule an upcoming meeting.

4.1.2.4 Local Community Interest Groups

TCL met with the following local community interest groups to provide information on the Project during the Early Engagement phase: The Bulkley Valley Community Resources Board, Skeena Watershed Conservation Coalition, Smithers Chamber of Commerce, Smithers Exploration Group, and Trout Creek Fish Hatchery. TCL began engaging with local community interest groups in Summer 2017 and continued throughout the early engagement phase. As detailed in **Table 6**, TCL has met with these groups 28 times collectively throughout the early engagement phase. Outside of these meetings, TCL has had the following number of interactions via email, phone, or letters:

- ▶ Bulkley Valley Community Resources Board (CRB) (18);
- ▶ Bulkley Valley Research and Monitoring Centre (BVRC) (15)
- ▶ Skeena Watershed Conservation Coalition (10)
- ▶ Smithers Chamber of Commerce (18)
- ▶ Smithers Exploration Group (25)
- ▶ Trout Fish Hatchery
- ▶ 19 Locally owned and operated businesses
- ▶ Education providers (9)
 - o Bulkley Valley Learning Centre
 - o Bulkley Valley Museum
 - o Coast Mountain College – Smithers Campus
 - o Smithers Secondary School

Table 6 provides a list of meetings between TCL and the local community interest groups during the Early Engagement phase and includes discussion topics.

Table 6 Local Community Interest Group Engagements

Meeting Date	No.	Discussion Topics
<i>Bulkley Valley Community Resource Board</i>		
2018 June 18	1	Project overview, EA regulatory process description, water use and quality, ARD mitigation measures, dust mitigation measures, air quality standards, noise levels at the mine site and blasting frequency, increase in truck traffic, direct economic benefits to the community, recreation access, visual quality, wildlife population concerns surrounding moose, caribou, aquatic life.
<i>Skeena Watershed Conservation Coalition</i>		
2018 April 26 August 9	2	Project overview, Skeena Watershed Conservation Coalition (SW) provides organizational overview, successful community relations strategies.
<i>Smithers Chamber of Commerce</i>		
2018 May 8 May 9	2	Project overview, economic benefits to local community.

Meeting Date	No.	Discussion Topics
<i>Smithers Exploration Group</i>		
2017 April 11 September 27	1	Project overview, TCL undertaking two feasibility studies, Indigenous engagement, Rock Talks, noise concerns, water quality and visual quality impacts.
<i>Trout Creek Fish Hatchery</i>		
2018 July 27	1	Lifecycle of salmon, operations of the hatchery, local waterways.
Total	7	
Local Business		
2018 July 24 September 4-5, 7, 10, 24 October 9-10, 18, 24-25 November 6	16	Project overview and timeline, employment opportunities, community perspectives on the project, regulatory process, habitat for local fish and aquatic life, water quality, stresses to local housing market.
Total	16	
Education		
2018 May 4 September 21, 25 October 10	5	Project overview, future opportunities for collaboration, upcoming TCL presentation to students, ways to increase student interest in mining, opportunities for Indigenous training.
Total	5	

4.1.3 Community Open Houses

As evidence of TCL's commitment to early community engagement, TCL held its first community open house on May 23, 2018 in Telkwa, with roughly 120 attendees (105 people signed in). The open house was the first in a series of five TCL plans to hold to share information, answer questions, track Project concerns, and form meaningful relationships with community members. Of the five open houses, the EAO will host two; one on the draft Application Information Requirements (AIR) and one on the Environmental Assessment Application (EAA). Through the initial open house, community members and interested parties identified concerns relating to:

- ▶ haul road:
 - ▶ traffic,
 - ▶ noise,
 - ▶ dust,
 - ▶ safety, and
 - ▶ maintenance;
- ▶ wildlife:
 - ▶ caribou and habitat, and
 - ▶ salmon and aquatic habitat;
- ▶ water:

- ▶ water use, and
- ▶ water quality;
- ▶ regulatory process and type of permit;
- ▶ mining practices;
- ▶ hunting access;
- ▶ impacts to property value;
- ▶ recreation; and
- ▶ ARD.

TCL developed 17 poster boards for the open house during the early engagement phase that covered several subjects, including general Project information and baseline studies to date. The open house was advertised via the following:

- Smithers Interior News
- The Moose FM
- CFNR Radio

4.1.4 Tenas Mine Neighbours Group

In addition to holding open houses for the community, TCL felt it was important to engage with the neighbours nearest the mine site. On November 8, 2017, TCL held a Tenas Mine Neighbours meeting at the Cointe River Inn for the Cottonwood subdivision, the closest neighborhood to the project area, comprising a dozen families. Many more community members attended the event than intended, including several dozen community members living outside the Cottonwood subdivision. At this neighbourhood meeting, TCL provided its conceptual project plan.

Topics discussed at the meeting included:

- ▶ project scope;
- ▶ coal haul route;
 - ▶ truck traffic,
 - ▶ noise,
 - ▶ safety, and
 - ▶ dust;
- ▶ the regulatory process;
- ▶ fish;
- ▶ water quality and use;
- ▶ caribou;
- ▶ forestry;
- ▶ recreational use of the area; and
- ▶ the coal market, including product quality.

TCL plans to hold neighbours' meetings twice a year for the fifteen families with property and/or tenure in close proximity to the Project as an opportunity to receive Project information and ask questions in an

intimate setting. Future neighbours' meetings are planned for the pre-application phase and application Review phase and will be discussed in **Section 4.2.3 and 4.3.3**.

4.1.5 Information Program

TCL's Information Program is a three-phase approach to share information with interested parties on various topics related to the Project, described below:

1. Phase 1 – Project and General Coal Bulletins
2. Phase 2 – Project-specific Infographics and Technical Briefs
3. Phase 3 – Potential Seminar Speaker Series on Phase 2 topics

Each phase is intended to build on the previous phase, with the goal of furthering community members understanding of mining and Project-related topics. The informational bulletins and technical briefs described in Phase two will be distributed electronically to interested parties and hard copies will be found at the Telkwa Office, Smithers Exploration Group Office, Coast Mountain College, and Smithers Library. The potential speaker series described in Phase three is intended to occur at a venue in either Telkwa or Smithers and will depend on the level of interest from the community.

The first phase of the Information Program was executed in early 2018 during the Early Engagement phase and involved sharing Project and general coal bulletins which included:

- "Tenas Project Brochure April 2018" (source: TCL)
- "Steel Making Coal"; (source: Coal Alliance)
- "Coal: How we use it" (source: Coal Alliance)
- "Coal: Health Facts" (source: Coal Alliance)
- "Coal: Local Economies" (source: Coal Alliance)
- "Basic Coal Facts" (source: World Coal Association)

Additional titles will be released to cover further topics of interest.

The second phase of the Information Program will be shared during the pre-application stage (**Section 4.2.4**). The third phase of the Information Program is intended to occur during the Application Review Stage (**Section 4.3.4**).

4.1.6 Early Community Engagement Outcomes

Through 12 months of early discussions, two key community concerns emerged. The first related to the Project's use of the Telkwa Coalmine Road for coal haul. Community members and interested parties expressed their preference for construction of a new road to bypass the community rather than using the existing road for coal haul, citing their concerns about:

- ▶ the potential safety risks to people walking or children playing on or near the existing road, as there are no sidewalks;
- ▶ the potential degradation of the gravel road due to weight of truck and frequency of truck traffic;
- ▶ the potential for dust generation and impairment of air quality to human health, as well as impacts to vegetable and fruit gardens; and
- ▶ the potential for noise.

The second key concern related to the regulatory process for the Project. While some community members did not have a preference for either the EAO or the EMPR to administer a project review, most of the community preferred the EAO administer the project review. Community members and interested parties overwhelmingly preferred TCL to be assessed under the BCEAA, primarily based on their level of

understanding of the EA process compared to EMPR and Environment & Climate Change Canada (ECCC) Strategy's Environmental permitting process.

Based on community feedback gathered in the early engagement phase regarding the Project's use of Telkwa Coalmine Road, TCL decided to build a dedicated haul road at the outset of the Project, instead of during operations which was originally planned. Advancing the construction of the dedicated haul road required an increase in planned mine production. The added production capacity brought the Project within the requirements of the BCEAA

4.2 Pre-Application Phase

Pre-Application phase consultation occurs following issuance of the Section 10 Order by the EAO and includes engagement undertaken up to the submission of the Environmental Assessment Certificate (EAC) Application. For the purposes of this Plan, engagement prior to the issuance of the Section 10 is referred to as early engagement. The Section 10 Order for the Project was issued by the EAO November 6, 2018.

During the pre-application phase, TCL intends to undertake a variety of activities to fulfil public consultation requirements of the Section 11 Procedural Order. The requirements for the pre-application phase include one public comment period and one community open house led by the EAO on the draft AIR. TCL will exceed requirements by hosting two open houses (in addition to the open house TCL hosted in the early engagement phase). Also, TCL will host two Tenas Mine Neighbours meetings (in addition to the meeting held in the early engagement phase), although this is not a regulatory requirement. These activities provide further opportunity to share information and build relationships between TCL and the community.

An important document that will be made available for public review during the pre-application phase will be the draft AIR document. The draft AIR identifies the information that will be provided by a proponent in an Application for an EAC. Community input and engagement is a key step in the development of the AIR document.

The primary activities to occur in the pre-application phase are:

- Ongoing General Engagement Activities
- Open Houses
- Tenas Mine Neighbours Group Meetings
- Information Program
- Public Comment Period on the draft AIR
 - o Document Availability
 - o Response to Comments
 - o Public Consultation Reports

As the Project progresses, TCL will continue to employ engagement strategies that promote effective communication and relationship-building. The following sections describe the pre-application phase efforts thus far, as well as future planned activities.

4.2.1 Pre-Application Phase General Engagement Activities

It is important to note that the pre-application phase of public consultation is a part of the overall continuum of community engagement with interested parties that began in early 2017 and will be ongoing throughout Project planning, construction, operations, and closure.

In addition to the public comment period, two open houses, two neighbours meetings, and Information Program, TCL will also have a variety of general engagement activities during the pre-application phase to communicate with interested parties and allow for open dialogue during this phase of the Project. General activities that have been ongoing since the early engagement phase, include but are not limited to:

- **Open-Door Policy** – TCL has an open-door policy at our local Telkwa office. Community members are encouraged to stop by the office to speak with team members (including the CEO), as well as view open house poster boards that are on display and other information materials.
- **General engagement Meetings and Presentations** – TCL is committed to continuous engagement with interested parties via in-person meetings, telephone calls, and emails to share Project information and ask Project-related questions.
- **Company Website** – Project updates and communication materials relevant to engagement will be posted on a company website.
- **Social Media** – TCL posts weekly to our Facebook and Twitter accounts. Content includes project information and updates, community events, communication and information materials.
- **Site Tours** – TCL may hold additional site tours during the pre-application phase for interested parties who wish to view key areas of where site development will occur.
- **Participation at Community and Industry Events** – TCL participated in several local community and industry events, including the Telkwa BBQ and the Bulkley Valley Exhibition in September 2018, and Minerals North in Houston in April 2018.

4.2.2 Community Open Houses

A total of three community open houses will be held during the pre-application stage; two will be led by TCL and one by EAO (these are in addition to the first open house held by TCL in May 2018 during early engagement). The first was held on November 28, 2018 at the Telkwa Elementary School Gym to allow the community and interested parties an opportunity to review Project poster boards and discuss the Project with the TCL team and subject matter experts, including wildlife, fish and vegetation biologists, and anthropologists. The second TCL led open house is tentatively planned for November 2019. An additional EAO led open house is expected to be held in Spring 2019 to facilitate review of the draft AIR document by interested parties. It is intended by the EAO that the 30-day public comment period will overlap with the draft AIR document open house.

TCL will develop poster boards and/or other materials for the open houses during the pre-application phase that will cover several subjects, including general Project information, baseline studies, Valued Components, and the draft AIR. Open houses will be advertised via the following:

- Smithers Interior News
- The Moose FM
- CFNR Radio

4.2.3 Tenas Mine Neighbours Group

TCL held its second neighbours meeting on November 7, 2018 at the Old Church in Smithers. As previously noted, at the initial neighbours meeting on November 8, 2017 at the Cointe River Inn, many more community members joined than was intended. As a result, several Tenas Mine Neighbours expressed their preference of having a more intimate meeting comprised of just those neighbours living within closest proximity to the Project. Therefore, when TCL held its second neighbours meeting, the fifteen families with property and/or tenure in close proximity to the Project were invited. At the second neighbours meeting, TCL gave a Project overview and update presentation.

Topics discussed at the meeting included:

- ▶ project overview;
- ▶ project updates;
- ▶ the regulatory process;

- ▶ coal mine road and proposed haul road;
 - ▶ truck traffic,
 - ▶ noise,
 - ▶ dust;
- ▶ water quality and use;
- ▶ access for recreation use

TCL held a third neighbours meeting with the fifteen families with property and/or tenure in close proximity to the Project on April 10, 2019 at the Ark Playday Centre in Telkwa to provide a project schedule and present the Tenas Project's baseline program.

4.2.4 Information Program

TCL's Information Program is a three-phased approach to share information with interested parties on various topics related to the Project. As previously noted, the Information Program phases are as follows:

1. Phase 1 – Project and General Coal Bulletins
2. Phase 2 – Project-specific Infographics and Technical Briefs
3. Phase 3 – Potential Seminar Speaker Series on Phase 2 topics

Phase one was initiated during the early engagement phase. The second phase of the Information Program consists of Project-specific Infographics to be accompanied by 1-2-page technical briefs.

Infographics and Technical brief topics include:

- Selenium
- BC Water Quality Guidelines
- Caribou Biology
- Mine Reclamation
- Fish and Aquatic Resources
 - o Bioaccumulation and Biomagnification;
 - o Environmental and Aquatic Effects Monitoring Programs; and
 - o Chemicals in the Aquatic Environment

The third phase of the Information Program will commence during the Application Review phase.

4.2.4.1 Engagement with Local Trapline Holders

The Project overlaps with one provincially-registered trapline (TR0609T026) and is approximately 6 km northwest of another trapline (TR0608T017).

On December 3, 2018, TCL sent a letter to nine people representing the two traplines within or nearby the Project area, notifying them of the Project and requesting a meeting to enable TCL to provide Project overview and answer questions. Many of the trapline holders use a general delivery service, a mail service that acts a temporary mailing address often used by individuals without a permanent address. Canada Post will hold general delivery service mail for an undisclosed time period before sending it back to the original sender. After TCL sent the nine letters on December 3, 2018, five letters were returned to TCL, prompting TCL to re-send the letters on January 24, 2019. Following this, four letters were sent back a second time, which resulted in TCL re-sending the four letters on February 20, 2019. TCL has been in ongoing communication with one of the trapline holders, having engaged three times during January 2019. TCL hopes to meet with this trapline holder and others that are interested in receiving Project information during the pre-application phase.

4.2.5 Public Comment Period

As per the requirements detailed in the Section 11 Order, the EAO will provide a public comment period of at least 30 days on the draft AIR document. The public comment period for the Project's draft AIR document is expected to be held in Spring 2020. To facilitate responses and feedback from the public and interested parties on the draft AIR document, the document will be made available through a variety of means, including:

- The EAO will make the draft AIR document available in electronic format on the EAO Electronic Project Information Centre (e-PIC) website
- Paper copies of the draft AIR document will be made available at several local locations (See **Section 4.2.5.1** for document availability)
- Paper and electronic copies will be made available at the open house held during the pre-application phase.

The public comment period for the draft AIR document will be advertised via the following:

- Smithers Interior News
- The Moose FM
- CFNR Radio

Advertisements posted in local newspapers will be prepared according to specifications provided by the EAO and will include a brief outline of the proposed Project and the purpose of the draft AIR document. The advertisements also will also provide details on the public comment period, the open house, and contact information for providing comments to the EAO.

4.2.5.1 Document Availability

The draft AIR document will be made accessible to the public and interested parties in a variety of ways to facilitate opportunities for the public and interested parties to review the document and provide feedback. As detailed in **Section 4.2**, TCL will make the draft AIR document available at several public locations. Paper copies of the draft AIR document will be available at the TCL Telkwa Office and other locations as required by the EAO.

4.2.5.2 Response to Comments

As per the Section 11 Order, TCL is required to respond to public comments received on the draft AIR document. Prior to finalization of the AIR document, TCL will respond in writing to all public comments received. The TCL responses to public comment will be provided to the EAO for review prior to finalization and posting to e-PIC. Public comments received by the EAO will be posted by the EAO to e-PIC within seven days of being received. Feedback and comments received on the proposed Project will be considered when finalizing the AIR document.

4.2.5.3 Public Consultation Reports

Over the course of the pre-application phase, TCL will document all consultation and engagement activities outlined in this Public Consultation Plan. Information documented and gathered will be used to adhere to and complete reporting requirements under the Section 11 Order issued for the Project. As per the Section 11 Order, the Public Consultation Report will include the following:

- Description of the results of any consultation activities undertaken during the pre-application phase, as described in this Public Consultation Plan;
- Summary of the following:
 - o Consultation with the local community and interested parties.

- o Copies of advertisements or public communications used during the application review phase.
 - o Information, comments, concerns, and questions received from the public
 - o Information on how the comments, concerns, and questions received from the community will be considered in Project planning.
- Outline steps for on-going and future consultation and engagement activities.

As per the Section 11 Order, Public Consultation Reports will be developed and provided to the EAO within 60 days after the close of a public comment period for the draft AIR document, and at the time the Application is submitted.

4.3 Application Review Phase

The application review phase is initiated upon acceptance of the EA Application for review by the EAO. TCL is committed to continuing consultation and engagement over the course of the Project to communicate details on the proposed Project, the potential effects, proposed mitigation measures, and to seek feedback from the local community and interested parties on the Application submitted for the Project to the EAO.

The primary activities to occur in the application review phase are similar to those to be carried out during the pre-application phase and include:

- General Ongoing Engagement Activities
- Open Houses
- Tenas Mine Neighbours Group Meetings
- Information Program
- Public Comment Periods
 - o Document Availability
 - o Response to Comments
 - o Public Consultation Reports

As the Project progresses, TCL will continue to employ engagement strategies that promote effective communication and relationship-building. The following sections describe future planned activities for the application review phase.

4.3.1 Application Phase General Engagement Activities

It is important to note that the Application Phase of public consultation is a part of the overall continuum of engagement with the community and interested parties that began in early 2017 and will be ongoing throughout Project planning, construction, operations, and closure.

In addition to the public comment period, an open house, a neighbours meeting, and Information Program, TCL will also conduct general engagement activities during the application review phase to communicate with interested parties and allow for open dialogue during this phase of the Project. General engagement activities that have been ongoing since the early engagement phase, include but are not limited to:

- **Open-Door Policy** – TCL has an open-door policy at our local Telkwa office. Community members are encouraged to stop by the office to speak with team members (including the CEO), as well as view open house poster boards that are on display and other information materials.
- **General engagement Meetings and Presentations** – TCL is committed to continuous engagement with the community and interested parties via in-person meetings, telephone calls, and emails to share Project information and ask Project-related questions.
- **Company Website** – Project updates and communication materials relevant to engagement will be posted on a company website.

- **Social Media** – TCL posts weekly to our Facebook and Twitter accounts. Content includes project information and updates, community events, communication and information materials.
- **Site Tours** – TCL may hold additional site tours during the Application phase for interested parties who wish to view key areas of where site development will occur.
- **Participation at Community and Industry Events** – TCL participated in several local community and industry events, including the Telkwa BBQ and the Bulkley Valley Exhibition in September 2018, and Minerals North in Houston in April 2018.

4.3.2 Community Open Houses

It is anticipated that one community open house will be held during the application review phase. The open house will be held by the EAO to provide the local community and interested parties an opportunity to review the EAA. This will allow interested parties to provide comments on the Project design, proposed mitigation measures, and potential Project-related effects. As with the open house during the pre-application review phase, the open house will likely occur during a respective 30-day public comment period. The EAO will also hold a 30-day public comment period for the Assessment Report (AR).

TCL will develop several poster boards for the open houses during the application review phase that will provide an overview of TCL's EAA. The community open houses during the application review phase will be advertised via the following:

- Smithers Interior News
- The Moose FM
- CFNR Radio

4.3.3 Tenas Mine Neighbours Group

TCL plans to hold a fourth neighbours meeting with the fifteen families with property and/or tenure in close proximity to the Project during the application review phase. In this meeting, TCL will present an overview of our EA Application and provide an opportunity for neighbours to comment on the Project design, proposed mitigation measures, and potential Project-related effects.

4.3.4 Information Program

TCL's Information Program is a three-phased approach to share information with the community and interested parties on various topics related to the Project. As previously noted, the Information Program phases are as follows:

1. Phase 1 – Project and General Coal Bulletins
2. Phase 2 – Project-specific Infographics and Technical Briefs
3. Phase 3 – Potential Seminar Speaker Series on selected Phase 2 topics

The third phase of the Information Program will be a potential seminar series where TCL subject matter experts will present on a variety of topics. The seminar series is expected to occur during the application review phase and will be dependent on the level of community interest. The tentative seminar series topics are:

- BC Water Quality Guidelines
- Caribou Biology
- Mine Reclamation
- Fish and Aquatic Resources
 - o Bioaccumulation and Biomagnification;
 - o Environmental and Aquatic Effects Monitoring Programs; and

- o Chemicals in the Aquatic Environment

4.3.5 Public Comment Periods

In accordance with the requirements set out in the Section 11 Order for the Project, the EAO will provide a public comment period of at least 30 days for the Application for an EAC. During the application review phase public comment period, the Application will be made available to the public through the following means:

- The EAO will make the Application available in electronic format on the EAO e-PIC website.
- A paper copy of the Application will be available at an undefined local location (See **Section 4.3.5.1** for potential document availability locations).
- Electronic copies will also be made available at the open house held during the application review phase.

The public comment period for the Application will be advertised via the following:

- Smithers Interior News
- The Moose FM
- CFNR Radio

Advertisements posted in local newspapers will be prepared according to specifications provided by the EAO and will include a brief outline of the proposed Project and the EAA. The advertisements also will provide details on the public comment period, the open house, and contact information for providing comments to the EAO.

The EAO requires a public comment period on the EAO's draft AR and proposed conditions of an EAC. The EAO will be responsible for posting the draft documents and responding to public comments. TCL will participate in this public comment period as directed by EAO.

4.3.5.1 Document Availability

The Application will be made accessible to the public and interested parties in both electronic and paper copies to facilitate opportunities for the local community and interested parties to review the Application and provide feedback. Electronic copies of the Application will be made available by the EAO on the e-PIC site. A paper copy of the Application will be available at the TCL Telkwa Office and other locations as required by the EAO.

4.3.5.2 Response to Comments

TCL is required under the Section 11 Order to respond to public comments received on the Application. TCL's responses to public comments will be provided to the EAO for review prior to finalization and posting to e-PIC. Comments received from the public will be posted to e-PIC by the EAO within seven days of being received. All consultation-related communications will be tracked over the Application phase and TCL will respond to each comment received in writing.

4.3.5.3 Public Consultation Reports

TCL will continue to document and log all consultation and engagement activities during the application review phase of the Project. Public Consultation Reports are also required under the procedural Section 11 Order during the application phase, and similar to the pre-application phase, will include:

- Description of the results of any consultation activities undertaken during the application review phase, as described in this Public Consultation Plan;

- Summary of the following:
 - o Consultation with the local community and interested parties
 - o Copies of advertisements or public communications used during the application review phase
 - o Information, comments, concerns, and questions received from the public
 - o Information on how the comments, concerns, and questions received from the community will be considered in Project planning.
- Outline steps for on-going and future consultation and engagement activities.

As part of the application review phase, Public Consultation Reports will be developed and provided to the EAO at the time the Application is submitted.

4.4 Ongoing Engagement

TCL is committed to creating and maintaining opportunities for constructive dialogue and relationships with the local community and other interested parties over the course of the Project. Should the Project be successful in receiving an EAC, consultation and engagement post-EAC and prior to construction of the Project and during operations will include:

- **Open-Door Policy** – TCL has an open-door policy at our local Telkwa office. Community members are encouraged to stop by the office to speak with team members (including the CEO), as well as view open house poster boards that are on display and other information materials.
- **General engagement Meetings and Presentations** – TCL is committed to continuous engagement with interested parties via in-person meetings, telephone calls, and emails to share Project information and ask Project-related questions.
- **Company Website** – Project updates and communication materials relevant to engagement will be posted on a company website.
- **Social Media** – TCL posts weekly to our Facebook and Twitter accounts. Content includes project information and updates, community events, communication and information materials.
- **Site Tours** – TCL may hold additional site tours for interested parties who wish to view key areas of where site development will occur.
- **Participation at Community and Industry Events** – TCL may participate or host local community or industry events, as appropriate, such as the Telkwa BBQ in September 2018 and the Family Day Skate in February 2019.

5. FEEDBACK, COMMUNICATION, AND ISSUES TRACKING

TCL will maintain a log of all communications with the local community and interested parties over the course of the Project. As per the Section 11 Order, all comments received during the public comment periods will be tracked and responded to in writing by TCL. Information will be provided to the EAO as part of the Public Consultation Reports, or at any time if requested.

A key part of community engagement is identifying and understanding community and interested parties Project concerns. In this spirit, TCL is committed to continuing to create and facilitate opportunities for the local community and interested parties to provide meaningful input and feedback on the Project. TCL will manage and maintain a tracking document for issues brought forward by the public during consultation and engagement activities. This approach allows TCL to gather input and feedback on the Project from the local community and interested parties and ensure it is considered during Project planning. It is TCL's intention that this method of public consultation will foster strong, collaborative and long-term partnerships with regulators, community groups, and other interested parties.